PROGRAM ASSESSMENT GUIDE

July 28, 2014
PROGRAM ASSESSMENT GUIDE

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BACKGROUND

Job Corps is a national residential training and employment program designed to address the multiple barriers to employment faced by at-promise youth throughout the United States. The program was originally established by the Economic Opportunity Act of 1964 and is currently authorized under Title I, Subtitle C, of the Workforce Investment Act of 1998.

Job Corps provides comprehensive career development services to students including academic, career technical, career success and independent living skills, and support services. The unique combination of services provided in the Job Corps program is designed to equip students with the knowledge, skills, abilities, and support needed for long-term success in the workforce.

The U.S. Department of Labor administers the Job Corps program and has responsibility for providing program policy, guidance, and oversight. Job Corps’ services are delivered through a nationwide network of Job Corps centers operated by private companies under contract to the Department of Labor or by other federal agencies under the terms of interagency agreements.

Job Corps’ Policy and Requirements Handbook (PRH) is the primary policy document that specifies the program components, standard requirements, outcome measures, and quality indicators for operation of the program.

Job Corps’ Program Assessment Guide (PAG) is designed as a companion to the PRH. It provides a standardized approach and framework for the review and evaluation of the extent to which contractors/operators deliver services as specified in the PRH.

PURPOSE

Job Corps’ Regional Offices (ROs) are charged with the responsibility of providing federal oversight of the Job Corps program to ensure that it is delivered with compliance, quality, and integrity.

The PAG is designed as a tool for use by ROs for conducting program assessments of Outreach Admissions (OA), center, and Career Transition Services (CTS) operations. Specifically, the PAG outlines a process for evaluating the extent to which a contractor/operator:

- operates in compliance with policy;
- achieves quality indicators; and
- assures the integrity of program operations.

Although contractors/operators have significant latitude in the design of their approaches and techniques for delivering services, the PRH establishes the baseline requirements and expectations for content and quality in program delivery. The PAG mirrors the PRH in structure and in intent, in that it provides strategies for assessing all program aspects,

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while allowing flexibility to accommodate varied program delivery designs and approaches.

The PAG is a dynamic document. Since its baseline for assessment is the PRH, the PAG will change as PRH requirements change. When requirements and quality indicators are added, changed, or deleted from the PRH, the related material in the PAG will also change.

**STRUCTURE**

The PAG is designed to provide the strategies and tools needed to assess compliance, quality, and integrity, as follows:

- **Compliance:** The PAG provides a variety of strategies for use by reviewers in assessing the extent to which the program is operated in compliance with requirements specified for each program component in the PRH.

- **Quality:** For each quality indicator, the PAG provides several options for use by reviewers in determining the extent to which quality indicators are achieved.

- **Integrity:** For those program aspects that require safeguarding of program assets and data, the PAG provides audit guides and checklists to assist reviewers in determining the extent to which the program is operated with integrity.

In addition, the PAG provides a framework and system for assigning a numerical rating to individual program components and to the overall program.

Consistent with the PRH, the PAG is organized into six chapters that reflect the major components of Job Corps’ Career Development Services System (CDSS). The sections of the PAG are as follows:

- **Preamble** provides background and general information regarding the PAG.

- **Chapter 1: Outreach and Admissions** covers the outreach and admission services provided to reach and enroll applicants. Center outreach, employer relationships, and public education requirements are included as well as the initial student contact with CDSS.

- **Chapter 2: Career Preparation Period** covers the range of services and activities provided during the student’s first phase of enrollment.

- **Chapter 3: Career Development Period** covers the full range of career development activities including academic, career technical training, workplace, social, and independent living skills.

- **Chapter 4: Career Transition Period** covers the placement and transitional support services needed for a student to retain full and gainful employment.

- **Chapter 5: Management** covers contractor/operator oversight, performance management, financial, and facilities management responsibilities.
**Chapter 6: Administrative Support** covers the range of administrative activities required to support the program, including records management, student support, health, and child development services.

**Appendix A: Regional Office Quality Assessment Model** provides a model process for conducting a quality assessment of all applicable PRH functions.

**Appendix B: Tools and Tips** provides how-to tools, ethical standards, and interview scripts for use when conducting quality assessments.

**Appendix C: PRH Requirements/Integrity Items** provides guidance for reviewing program components related to procurement and data integrity.

- **Appendix C-1: Procurement Review Guide** is used to determine the extent to which the contractor’s purchasing system demonstrates and ensures compliance with Government policies and contractual terms.

- **Appendix C-2: Data Integrity Audit Guide** is used to ensure the validity and reliability of Job Corps performance management systems. The audits provide a mechanism for RO staff to identify and report on specific instances of improperly reported or anomalous data and management practices that could potentially affect data integrity.

**ASSESSMENT GUIDELINES AND REQUIREMENTS**

*Frequency:* In order to provide adequate program oversight, the RO is expected to conduct periodic program assessments every 12 to 24 months.

*Flexibility:* The PAG provides reviewers with flexibility to design the assessment approach to suit the entity being assessed, taking into consideration specific operator needs or challenges and regional emphases or initiatives. However, as part of each assessment, the region must conduct an audit to ensure data integrity.

The PAG provides a variety of strategies that can be used to assess each requirement and quality indicator delineated in the PRH. Reviewers may select from among those strategies, modify or expand them, or substitute other approaches that have been found to be effective. However, when assessing services, reviewers using the PAG may not change or add requirements or quality indicators that are not in the PRH.

Prior to conducting any program assessment, the RO staff is encouraged to conduct a pre-onsite analysis to determine the priorities and techniques for the assessment that will result in fostering continuous improvement of services.

*Integrity Audit Requirements:* Ensuring the integrity of Job Corps’ performance data and safeguarding program assets are critical aspects of providing effective oversight and ensuring program credibility. Therefore, concurrent with program assessments, ROs must conduct audits of approximately 10% of all performance related student records. The audit size will depend upon the size and complexity of the operation. If excessive reporting problems are present, the extent of misreporting will be brought to the immediate attention of the National Office. ROs will utilize targeted samples developed by a National Office designated and independent third party contractor.

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PROGRAM RATING SYSTEM (PRS)

In addition to the Outcome Measurement System (OMS) that is used to assess quantitative performance outcomes, Job Corps uses a Program Rating System (PRS) as a qualitative measure of performance for center/OA/CTS operations. The RO assessment establishes a baseline PRS score for the operations. As changes in operations warrant, the RO may make changes to the PRS score. The PRS score is reported to the National Office and is used by Regional Contracting Officers for procurement purposes as part of each operator’s past effectiveness rating.

Purpose

The PRS provides a vehicle for assessing the quality of services provided to students and employers by center, OA, and CTS contractors/operators. The PRS evaluates the extent to which the operator:

- delivers the program in compliance with PRH and contractual or interagency requirements; and
- achieves expected results as defined by the quality indicators specified in the PRH.

The PRS is designed to:

- Set and define expectations for program compliance and quality.
- Capture, assess, and provide feedback on compliance and quality aspects that are not measured by statistical outcomes.
- Recognize best practices and commendable aspects of program operation.
- Communicate clearly what needs to be done to improve program delivery.
- Provide a qualitative program rating.
- Provide a clear rationale for the qualitative rating assigned.

The PRS provides reviewers with a consistent approach to assessing the delivery of program services and determining an appropriate qualitative rating.

Consistent with the PRH and the PAG, the PRS is organized into six functional areas that reflect the four major components of CDSS management and administrative support. The functional areas rated in the PRS may or may not reflect the actual organization of the contractor’s operation. Contractors have the flexibility to construct and deliver programs that achieve the best results for students. Many Job Corps operations will have differing organizational structures supporting the assessed functions. Therefore, reviewers will need to be flexible when organizing their data gathering and analysis techniques. Communicating and sharing information is required to adequately assess the functions in the PRS, especially management and administrative support. These functions have a number of cross-cutting requirements and quality indicators.

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Each requirement and quality indicator is scored and reported in only one functional area, even though information contributing to the assessment of that area is gathered from multiple organizational units and staff across program operations. Careful coordination among reviewers assigned to each function and information sharing among all team members, regardless of assignment, is critical for a thorough assessment.

Assessment Team Responsibilities

For each assigned program function, assessment team members are expected to:

- evaluate the extent to which the program is delivered in compliance with policy and contractual requirements;
- determine the degree to which quality indicators are being achieved;
- identify strengths and areas that need improvement;
- validate the integrity of program data;
- assign a PRS score; and
- provide a rationale for the ratings assigned.

PRS Matrix

The PRS matrix, shown below, provides a structure for recording assessment results. It consists of a matrix of cells for recording the compliance and quality ratings for each of the six functional areas, weighted scores of each function, and the overall summary rating.

As team members evaluate activities and services, it is important throughout the assessment to keep in mind which function in the PRS matrix is affected by the data. During the assessment process, team members may wish to annotate their notes to indicate the appropriate function in the PRS matrix to which the data pertain. This facilitates discussing the information with the team during the program assessment, assigning a rating for each function, and making decisions about where and how to place information in the formal report.

To allow ROs the flexibility to identify and focus on particular areas of program emphasis, each RO will assign weights annually for:

- Overall quality and compliance
- Each of the six functional areas

The assigned weights will apply regionwide and will be made known to operators prior to the beginning of the annual assessment cycle.

The average rating (AVG) for each of the functional areas (PRH chapters) will be the sum total of the weighted quality and compliance areas for that chapter. The total rating for each function is determined by multiplying the weight times the average rating for

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each area. The total composite rating will equal the sum total of all of the weighted totals of each functional area.

<table>
<thead>
<tr>
<th>CATEGORY (Weight)</th>
<th>Quality Rating %</th>
<th>Compliance Rating %</th>
<th>Composite Rating</th>
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<tbody>
<tr>
<td>Chapter 1: Outreach &amp; Admissions</td>
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<tr>
<td>Chapter 2: Career Preparation Period</td>
<td>SCORE</td>
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<td>Chapter 3: Career Development Period</td>
<td>SCORE</td>
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<td>Chapter 4: Career Transition Period</td>
<td>SCORE</td>
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<td>Chapter 5: Management</td>
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<tr>
<td>Chapter 6: Administrative Support</td>
<td>SCORE</td>
<td>WEIGHT</td>
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**PRS Ratings Definitions**

The assessment process is designed to determine the extent to which program operations meet the Government’s requirements and expected outcomes. The PRH requirements and quality indicators set benchmarks for the Government’s expectations. Job Corps uses an adjectival rating system to assign ratings to each requirement, quality indicator, and overall program component. The adjectival rating system uses five adjectives, as recommended by the Office of Federal Procurement Policy, to define the degree to which expectations are met. The PRS adjectival rating system is consistent with the adjectival rating systems used by Job Corps for the Contractor Past Effectiveness Rating (CPER) and for evaluation of proposals. Adjectival ratings are defined as follows:

**Exceptional**

Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.

**Very Good**

Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.
**Satisfactory**

Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.

**Marginal**

Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.

**Unsatisfactory**

Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.

**Assigning a PRS Score**

The PRS adjectival ratings definitions are designed to assist evaluators in assigning scores for each requirement, quality indicator, and overall program component by describing what is expected for each adjectival level.

The ratings are made against a 10-point scale, as shown below.

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</tr>
</thead>
<tbody>
<tr>
<td>Unsatisfactory</td>
<td>Marginal</td>
<td>Satisfactory</td>
<td>Very Good</td>
<td>Exceptional</td>
<td></td>
<td></td>
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Once evaluators have determined which definition most closely describes the performance, a numerical rating is assigned based on the level of performance within the adjectival range. The numerical score is entered in the appropriate cell in the program assessment matrix. The functional scores are combined to produce the overall summary score for the center or OA/CTS operation.

**Establishing the Initial PRS Score**

Initial or baseline PRS scores are assigned by ROs based on the following:

- A full program assessment conducted by a RO team of evaluators performed every 12 to 24 months for each OA, center, and/or CTS contract.
- A program assessment conducted over a period of 12 to 24 months using smaller teams, project manager visits, or other methods by assessing one or more functions during a visit.

Completing the full assessment during one visit by a single assessment team is not required. However, every function in the program assessment matrix must be assessed and assigned a PRS score. These functional ratings are then tabulated to determine the
overall rating. Functional ratings and the resulting overall rating provide the initial baseline PRS score for the contractor/operator.

**Adjusting PRS Scores**

Once an initial/baseline PRS score has been assigned, the scores may be changed based on the following activities:

- Subsequent full program assessments conducted by RO evaluation teams.
- Subsequent partial program assessments that may or may not assess all program components. If one or more functions are not assessed during an evaluation, the rating for that function(s) is carried over from the previous RO assessment (or last change to the matrix score if it occurred after the last RO assessment) and used with the newly assessed function ratings to calculate the overall program assessment rating. Any ratings that are carried over should be annotated as to their source.
- Follow-up monitoring visits. Adjustments to the overall program assessment rating may be made by the RO based on significant changes which can be documented. Such changes frequently result from verification of the change by the project manager during monitoring visits. If the RO determines that one or more matrix function ratings warrant change, the new score(s) is recorded in the matrix, replacing the rating for that function(s) from the previous RO program assessment (or last change to the matrix rating if it occurred after the last assessment). The matrix is then recalculated to produce a new overall OA/center/CTS PRS score.

All adjustments to ratings are examined in light of the applicable requirements and quality indicators for the entire functional area to ensure that the program change is of sufficient weight to justify a new function score.

All adjustments to the overall rating must be submitted by the RO to the National Office in a letter requesting the change. The request should include:

- a brief statement of the program change that precipitated the rating change;
- the method of assessment (e.g., monitoring trip, records review);
- the date the change applies; and
- a new quality matrix with the changed rating(s) annotated.

A copy of the request should be provided to the contractor/operator. Adjustments to the overall program assessment rating may be submitted no more than once per month.

**ASSESSMENT REPORT**

Following a RO program assessment, a report is prepared reflecting the results of the assessment. In preparing the report, the assessment results must be presented in a logical manner that identifies:

- the methodology used for the assessment;

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• best practices and areas of improvement since the last assessment; and
• concerns with associated priority for correction/improvement.

The report must include the PRS matrix with final ratings for each function and an overall rating.

The intended audiences for the report are the RO, the contractor/operator, and the Job Corps National Office. The National Office reviews and retains assessment reports to provide responses to oversight groups when requested. ROs and contractors/operators use reports to monitor continuous improvement and provide historical data regarding operations.

The report, signed by the Regional Director or designee, is submitted to the contractor/operator, as well as the National Office of Job Corps, no later than 45 days after the assessment. The contractor/operator prepares a corrective action plan to address areas identified as needing improvement within 30 days following receipt of the report.

The following format will be used by ROs to report program assessment results to the National Office. Each narrative report must include at a minimum:

A. Executive Summary

The executive summary serves as an overall snapshot of the assessment team’s view of the center. It should be short, concise, and able to stand alone as a short summary of the review in order to be provided as a response to an information request. The summary could include information gleaned through the pre-onsite analysis. However, the summary should include at a minimum:

1. Purpose of the assessment: regular or special, by whom, and the outcome of the last assessment
2. History of the center: location, characteristics
3. The assessment team: assignment and composition
4. List of major strengths and weaknesses: general statements outlining identified strengths and weaknesses
5. Executive summary narrative: general narrative outlining the results of each functional area assessed, with an emphasis on the quality indicators
6. Comparative statistical data: Chart that lists the OMS data for the OA, center, or CTS contract in comparison to regional and national averages over the preceding 12-month rolling period of performance
7. Contract year-to-date cost data: applicable contract year-to-date cost data related to current budget, budget status (underrun/overrun amount), student year cost (SYC) or cost per arrival/placement, and other pertinent data
8. Program year-to-date OBS comparison: the program year-to-date OBS and weekly termination rate (WTR) for the center in comparison to regional and national averages

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9. The rating matrix that includes the program assessment rating

B. Assessment Rating

The overall PRS score determined by the regional assessment team, along with a general narrative rationale for the score assigned.

C. Rating Narrative

The rating narrative presents the documentation for the overall rating. This narrative is considered an “internal work paper” and is, therefore, not subject to disclosure under the Freedom of Information Act. Narrative documentation must be provided for all ratings.

The ROs have the discretion, in their full report, to include any other information (safety, health reviews, project manager checklists, staff/student surveys, etc.) and to design their own format for the documentation of the operator’s performance.

The National Office of Job Corps requires the electronic submission of the full report. The RO is expected to maintain a copy of the full report for at least 5 years, in the event that a request is made for additional information.

Integrity audit findings will be incorporated in the narrative section of the report. The findings will be listed in the applicable section of the narrative. ROs shall follow the instructions in Appendix C of the PAG for the conduct of targeted sample audits for data integrity.

REGIONAL OFFICE FOLLOW-UP

Follow-up provided by the contractor and the RO ensures continued improvement. At times, the action taken fails to achieve the expected outcome.

Early discovery and intervention help the contractor focus on resolution. The expected objective of each corrective action should be defined. As the RO prepares for follow-up activities, priority items are selected from the contractor’s response to the RO assessment to examine during the follow-up.
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
<th>Acronym</th>
<th>Definition</th>
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<tbody>
<tr>
<td>AAPP</td>
<td>Annual Advanced Procurement Plan</td>
<td>CCC</td>
<td>Civilian Conservation Centers</td>
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<tr>
<td>AC</td>
<td>Admissions Counselor</td>
<td>CCDP</td>
<td>Center Career Development Plan</td>
</tr>
<tr>
<td>ACAT</td>
<td>Admissions Counselors Assessment Tool</td>
<td>CD</td>
<td>Center Director</td>
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<tr>
<td>ACBM</td>
<td>Asbestos-Containing Building Material</td>
<td>CDC</td>
<td>Centers for Disease Control</td>
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<tr>
<td>ACT</td>
<td>Advanced Career Training</td>
<td>CDC</td>
<td>Child Development Center</td>
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<tr>
<td>ADA</td>
<td>Americans With Disabilities Act</td>
<td>CDL</td>
<td>Commercial Driver’s License</td>
</tr>
<tr>
<td>AFL-CIO</td>
<td>American Federation of Labor and Congress of Industrial Organizations</td>
<td>CDP</td>
<td>Career Development Period/Plan</td>
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<td>AFV</td>
<td>Alternative Fuel Vehicles</td>
<td>CDSS</td>
<td>Career Development Services System</td>
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<tr>
<td>AIDS</td>
<td>Acquired Immunodeficiency Syndrome</td>
<td>CIS</td>
<td>Career Information System</td>
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<tr>
<td>AIMS</td>
<td>Apprenticeship Information Management System</td>
<td>CMHC</td>
<td>Center Mental Health Consultant</td>
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<td>Average Length of Stay</td>
<td>COP</td>
<td>Center Operating Plans</td>
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<tr>
<td>ANSI</td>
<td>American National Standards Institute</td>
<td>COTR</td>
<td>Contracting Officer’s Technical Representative</td>
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<td>AP</td>
<td>Admissions Process</td>
<td>CPAF</td>
<td>Cost Plus Award Fee</td>
</tr>
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<td>ASP</td>
<td>Office of Assistant Secretary for Policy</td>
<td>CPER</td>
<td>Contractor Past Effectiveness Rating</td>
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<td>Advanced Training</td>
<td>CPFF</td>
<td>Cost Plus Fixed Fee</td>
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<td>ATELS</td>
<td>Apprenticeship, Training, Employer, and Labor Services</td>
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<td>Consumer Price Index</td>
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<td>Average Weekly Benefit Amount</td>
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<td>Absent Without Leave</td>
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<td>Average Wage at Placement</td>
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<td>Career Transition Readiness</td>
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<td>Federal Employment Retirement Security Act</td>
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<td>Full-Time Equivalent</td>
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<td>Department of Labor</td>
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<td>Federal Telephone System</td>
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<td>EEO</td>
<td>Equal Employment Opportunity</td>
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<td>EEOC</td>
<td>Equal Employment Opportunity Commission</td>
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<td>Government Accounting Office</td>
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<td>EFL</td>
<td>Educational Functional Level</td>
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<td>ELL</td>
<td>English Language Learner</td>
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<td>General Education Development</td>
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<td>EMLV</td>
<td>Emergency Leave</td>
<td>GFCI</td>
<td>Ground Fault Circuit Interrupter</td>
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<td>EPA</td>
<td>Environmental Protection Agency</td>
<td>GPRA</td>
<td>Government Performance and Results Act</td>
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<td>ePCDP</td>
<td>Electronic Personal Career Development Plan</td>
<td>GSA</td>
<td>General Services Administration</td>
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<td>EPCRTKA</td>
<td>Emergency Planning and Community Right-to-Know Act</td>
<td>HBI</td>
<td>Home Builders Institute</td>
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<td>EPMS</td>
<td>Electronic Property Management System</td>
<td>HEPA</td>
<td>High Efficiency Particulate Air Filter</td>
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<td>ESA</td>
<td>Employment Standards Administration</td>
<td>HIPAA</td>
<td>Health Insurance Portability and Accountability Act</td>
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<td>ESC</td>
<td>Engineering Support Contractor</td>
<td>HIV</td>
<td>Human Immunodeficiency Virus</td>
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<td>ESL</td>
<td>English as a Second Language</td>
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<td>High School Diploma</td>
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<td>ESP</td>
<td>Evaluation of Student Progress</td>
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<td>Industry Council</td>
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<td>Employment &amp; Training Administration</td>
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<td>Individuals With Disabilities Education Act of 2004</td>
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<td>Federal Acquisition Regulation</td>
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<td>Interdisciplinary Team</td>
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<td>FECA</td>
<td>Federal Employees’ Compensation Act</td>
<td>IEP</td>
<td>Individual Education Plan</td>
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## Glossary of Acronyms

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<tr>
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<th>Description</th>
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<tbody>
<tr>
<td>ILAB</td>
<td>Bureau of International Labor Affairs</td>
</tr>
<tr>
<td>INS</td>
<td>Immigration and Naturalization Service</td>
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<tr>
<td>IT</td>
<td>Information Technology</td>
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<td>JATF</td>
<td>Joint Apprenticeship Trust Fund</td>
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<td>JCCDRC</td>
<td>Job Corps Career Development Resource Center</td>
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<td>JCDC</td>
<td>Job Corps Data Center</td>
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<td>JCRL</td>
<td>Job Corps Resource Library</td>
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<tr>
<td>JTM</td>
<td>Job Training Match</td>
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<td>LAN</td>
<td>Local Area Network</td>
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<td>LEA</td>
<td>Local Education Agency</td>
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<td>LETC</td>
<td>Labor Employment and Training Corporation</td>
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<td>LLSIL</td>
<td>Lower Living Standard Income Level</td>
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<td>Labor Market Information</td>
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<td>LOS</td>
<td>Length of Stay</td>
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<td>LPG</td>
<td>Liquefied Petroleum Gas</td>
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<td>M&amp;IE</td>
<td>Meals and Incidental Expenses</td>
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<td>MIS</td>
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<td>MOU</td>
<td>Memorandum of Understanding</td>
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<td>MPO</td>
<td>Management Performance Outcome</td>
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<td>MPR</td>
<td>Minimum Productivity Rule</td>
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<td>MSDS</td>
<td>Materials Safety Data Sheets</td>
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<td>Not Present for Duty</td>
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<td>National Training Contractor</td>
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<td>O&amp;M</td>
<td>Operation and Maintenance</td>
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<td>O*NET</td>
<td>Occupational Information Network</td>
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<td>PAG</td>
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<td>Polychlorinate Biphenyls</td>
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<td>PDOF</td>
<td>Present for Duty Off Center</td>
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<td>PII</td>
<td>Personally Identifiable Information</td>
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<td>Placement Outcome Measurement System</td>
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<td>SOW</td>
<td>Scope of Work</td>
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<td>PPE</td>
<td>Personal Protective Equipment</td>
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<td>SPAMIS</td>
<td>Student Pay, Allotment and Management Information System</td>
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<tr>
<td>PRB</td>
<td>Post Retirement Benefits</td>
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<td>Student Performance Evaluation Record</td>
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<td>PRH</td>
<td>Policy &amp; Requirements Handbook</td>
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<td>SPO</td>
<td>Student Personnel Officer</td>
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<td>PRL</td>
<td>Property Requirements List</td>
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<td>SSS</td>
<td>Student Satisfaction Survey</td>
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<td>PRS</td>
<td>Program Rating System</td>
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<td>SST</td>
<td>Social Skills Training</td>
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<td>Post-Secondary Credit</td>
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<td>STW</td>
<td>School-to-Work</td>
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<td>QI</td>
<td>Quality Indicators</td>
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<td>Student Year</td>
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<td>Tests of Adult Basic Education</td>
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<td>TAR</td>
<td>Training and Achievement Record</td>
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<td>TCU</td>
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<td>Trainee Employee Assistance Program</td>
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<td>Tobacco Use Prevention Program</td>
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<td>Request For Quote</td>
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<td>Uniform Building Code</td>
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<td>UPAL</td>
<td>Unpaid Administrative Leave</td>
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<td>ROAR</td>
<td>Regional Office Assessment Report</td>
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<td>USDA</td>
<td>United States Department of Agriculture</td>
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<td>ROCA</td>
<td>Regional Office Center Assessment</td>
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<td>Wide Area Network</td>
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<td>SAAS</td>
<td>Student Allowance and Allotment System</td>
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<td>WBL</td>
<td>Work-based learning</td>
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<td>SAG</td>
<td>Student Activity Guide</td>
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<td>Work Experience Program</td>
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<td>Student Government Association</td>
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<td>WIA</td>
<td>Workforce Investment Act</td>
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<td>SHIMS</td>
<td>Safety and Health Information Management System</td>
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<td>Weekly Termination Rate</td>
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<td>SIR</td>
<td>Significant Incident Report</td>
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<td>ZT</td>
<td>Zero Tolerance for Violence and Drugs</td>
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<td>SOP</td>
<td>Standard Operating Procedure</td>
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July 28, 2014
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<tr>
<td><strong>Exceptional (8/9)</strong></td>
<td>Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.</td>
</tr>
<tr>
<td><strong>Very Good (6/7)</strong></td>
<td>Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.</td>
</tr>
<tr>
<td><strong>Satisfactory (4/5)</strong></td>
<td>Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.</td>
</tr>
<tr>
<td><strong>Marginal (2/3)</strong></td>
<td>Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.</td>
</tr>
<tr>
<td><strong>Unsatisfactory (0/1)</strong></td>
<td>Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.</td>
</tr>
</tbody>
</table>
1.0 OBJECTIVES

To ensure that the Job Corps program maintains a positive public image, strong community and employer partnerships, a pool of qualified and committed applicants who meet the requirements for enrollment in Job Corps, and full utilization of Job Corps training opportunities.

To make certain that applicants of the program are provided with professional and personalized services throughout the admissions process that maintain the applicants’ rights, and follow applicable laws.
1.1 OUTREACH

PURPOSE

P1. To foster and maintain a positive public image of the program by:
   - Educating the public about the training opportunities that the Job Corps program provides for at-risk youth;
   - Ensuring that Job Corps is an active member/partner in the state and local workforce training community, including American Job Centers, local Workforce Investment Boards, and Youth Councils.

P2. To attract youth who are able to qualify for admission to and successfully complete the program, and ensure universal access to all potentially qualified youth.

P3. To ensure the center is viewed as an asset and partner within the community by:
   - Involving employers with the Job Corps program in local and distant labor markets where students seek employment;
   - Actively involving the community with the center and the students.

P4. To comply with applicable legal requirements.

To qualify for enrollment in Job Corps, potential students must meet specific eligibility requirements set forth in 20 C.F.R. 670.400 and other requirements set forth in 20 C.F.R. 670.410. Except when necessary to distinguish between these factors, the PRH will collectively refer to them as eligibility or admissions requirements, or qualifications, and to students who meet them as eligible, qualified, or admissible.

REQUIREMENTS

R1. Outreach/Public Education Plan

Outreach and Admissions/Career Transition Services (OA/CTS) contractors and centers must develop and implement outreach/public education plans, as part of an overall Career Development Services System (CDSS) Plan. The plan must demonstrate collaboration and consultation between OA/CTS contractors and centers, and must comply with the outreach requirements of the Workforce Investment Act (WIA) nondiscrimination requirements at 29 CFR 37.42. The plan must be submitted to the Regional Office for review and approval, in accordance with PRH Chapter 5, Section 5.1, R3.c, Career Development Services System Plan, and must include, as applicable:

a. Outreach strategies to achieve and maintain overall design capacity;

b. Strategies to ensure coordination of efforts between OA/CTS contractors and center Business and Community Liaisons, including liaisons with community organizations that serve specific targeted groups referred to in c.4 below.
c. A description of the public education and outreach methods, activities, events, and linkages that will be developed to:

1. Foster referrals of eligible youth from various targeted groups referred to in c.4 below.
2. Promote positive public awareness of student and center achievements.
3. Respond to media and public inquiries with consistent and factual information.
4. Reach potential applicants who represent the diversity of the community in which the Job Corps center is located in terms of the following characteristics:
   - Gender
   - Race and ethnicity, including status as Limited English Proficient (LEP) / English Language Learner (ELL)
   - Disability status

5. Publicize the Job Corps program and the center in media that specifically target various populations referred to in Section 1.1, R1.c.4, such as newspapers, television and radio programs, and websites with streaming audio and video. Ensure that the selected outreach tools include media in languages appropriate to the population served by the center.

d. A description of outreach methods and materials to be distributed to, and maintained at, American Job Centers, Youth Councils, schools, social service agencies including those that serve foster care and homeless youth, organizations, communities, youths, general public, youth programs, employers, other employment and training programs, vocational rehabilitation agencies, and other organizations or entities that serve specific targeted populations referred to in Section 1.1, R1.c.4, such as members of both sexes, individuals with disabilities, or various racial or ethnic groups. Such materials must:

1. Include center-specific information including available career technical training, certification, credentialing, and licensure opportunities.
2. Be designed to reach a diverse audience. Selected materials should be translated into languages appropriate to the population served by the center.
3. Be available in alternate formats for persons with disabilities (e.g., large print, audio tape, open captioning, Braille).
4. Include the exact language of the following tag lines, as required by 29 CFR 37.34(a): “Equal opportunity employer/program. Auxiliary aids and services are available upon request to individuals with disabilities.”
5. Provide phone numbers for TTY/TDD or relay service contact for people whose disabilities prevent them from using voice telephones.
6. Be distributed to schools, social service agencies including those that serve foster care and homeless youth, youth programs, other
employment and training programs.

e. Be a direct referral system that provides unions, business/industry organizations, and individual employers a mechanism for referring youth who may be qualified to participate in Job Corps. Applicants recruited through direct referrals must meet all Job Corps eligibility and other requirements for enrollment and fully participate in all career preparation activities. Direct referral applicants do not have priority over those waiting to enter Job Corps, nor do they have priority over those who are on a waiting list for a specific training program.

f. Provide a system to ensure follow-up on all referrals within three business days of receipt.

g. Have a system to document and monitor the effectiveness of outreach efforts, including efforts to collaborate with American Job Centers.

h. Have a LEP/ELL Readiness Plan that outlines the steps that will be taken to meet the needs of LEP/ELL applicants. This plan should comply with the U.S. Department of Labor Policy Guidance entitled “Policy Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons,” 68 Federal Register 32289 (May 29, 2003) (available at http://www.dol.gov/oasam/regs/fedreg/notices/2003013125.htm).

Strategy:

- Review the Outreach Plan. Does it have Regional Office approval? Is it current? Read the plan to ensure that all requirements are met. As you are reviewing specific areas covered by the plan, query staff members to see if they are following plan.

- Review recent morning reports, and the PY cumulative On-Board Strength (OBS).

- Review the LEP/ELL Readiness Plan.

- Have the OA and center collaborated to achieve and maintain overall design capacity?

- Review the approved Geographic Assignment Plan (GAP) against the Outreach and Admissions Student Input System (OASIS) Arrival Reports and Pending Arrival Reports. Is the OA meeting GAP assignment goals for male and female arrivals?
Rationale for Rating:

R2. **Center Information**

Centers must:

a. Provide Admissions Counselors (ACs) and American Job Centers with current information, including a video where possible, about all aspects of center life, including the center’s Career Development Services System (CDSS); the availability of career technical training; on-center certification, credentialing, and licensure opportunities; dorm life; center standards of conduct; recreation; and support services.

b. Provide ACs with copies of current career technical Training Achievement Records (TARs);

c. Offer center tours to prospective applicants, parents, school counselors, employers, etc., whenever possible;

d. Assign staff and students to participate in outreach activities as needed.

Strategy:

- Through observation and review of center/OA staff meeting minutes, check to see how and when center staff interacts with OA staff. Is there a designated liaison? Ask for copies of materials that are provided to the OAs, such as:
  - Updates on center changes;
  - Career technical training offerings; projected openings; on-center certification, credentialing, and licensure opportunities;
  - Advanced training programs, start dates, and enrollment procedures;
  - Information regarding class schedules, dorm life, recreation, center standards of conduct and support services;
  - Pre-admission packets;
  - Driver’s license requirements; and
  - Center tour availability and schedules.

- Determine what outreach activities the center conducts.
R3. Use of Applicant and Student Photos and Moving Images

a. All contractors and centers must ensure that photos and moving images of Job Corps applicants and students are not taken, used on printed materials, or posted on the Internet, except when proper releases have been obtained, as specified in Appendix 601 (Student Rights to Privacy and Disclosure of Information).

b. Job Corps centers will ensure that candidates for public office will neither be permitted to film or take photographic images on center property within 60 days of an election, nor conduct any campaign activities during a center visit.

Strategy:

➢ Ask where releases are kept and in what instances releases are needed. Review examples of how releases are used.

➢ Review Appendix 601 for specific details regarding the use of student photos and moving images.

R4. Notification of Newsworthy Events

OA/CTS contractors and centers must:

a. Notify the Regional Office of newsworthy events, press, or media coverage, to include all visits by elected officials.
b. Immediately notify and consult with the Regional Office for guidance and approval of news releases regarding the release of any adverse or negative information.

Strategy:

➢ Ask for a copy of the relevant Standard Operating Procedure (SOP) related to newsworthy events. Interview responsible person(s) to see if they follow appropriate procedures. How is documentation kept on any relevant occurrences?

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Rationale for Rating:

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**R5. Notification of Discrimination Complaints**

OA/CTS contractors and centers must promptly notify the Regional Office of any administrative actions or lawsuits that are filed against the contractor or center that allege discrimination on the ground of race, color, religion, sex/gender, national origin, age, disability, political affiliation or belief, citizenship, or participation in a program or activity financially assisted under WIA Title I, including those filed by students and applicants. The notification must include:

1. Names of the parties to the action or lawsuit;
2. Forum (court or administrative agency) in which each case was filed; and
3. Relevant case numbers.

The Regional Office will convey the information to the National Office, which is responsible for promptly conveying this information to the U.S. Department of Labor Civil Rights Center (DOL-CRC), as described in 29 CFR 37.38(a).

Strategy:

➢ Ask for a copy of the relevant SOPs related to notification of discrimination complaints. Interview responsible person(s) to see if they follow appropriate procedures. How is documentation kept on any notifications?
R6. Partnerships and Linkages

a. OA/CTS contractors and centers will, as applicable:

1. Work cooperatively with schools, social service agencies including those that serve foster care and homeless youth, American Job Centers, youth councils, youth programs, other employment and training programs, state vocational rehabilitation agencies, associations, and other appropriate organizations, including organizations and other entities that serve the targeted populations referred to in Section 1.1, R1.c.4, to promote referral of applicants who are eligible to participate in the Job Corps program. In this regard, close cooperation between the National Training Contractors (NTCs) and OA/CTS contractors is essential in assisting potential enrollees who have been referred to Job Corps by unions/employers that work with the NTCs.

2. Establish working relationships and partnerships, including membership where appropriate, with One-Stop systems, state and local Workforce Investment Boards, youth councils that operate as part of local boards, and other local employment and training programs for youth.

3. Ensure that Job Corps services are included on the menu of services found on the Internet that are available through the One-Stop system.

4. Develop linkages and relationships that enhance the quality of services to students and the community, such as work-based learning; leisure-time employment; high school, college, and other career technical training programs; on-the-job training; One-Stop services; career services; and job placement.

Strategy:

- Ask for list of relevant cooperating agencies.
- Determine if the center participates in or is represented on the various groups described in Section 1.1., R1, c.4.
Request copies of relevant Memorandum of Understanding (MOU) (e.g., National Training Contractor (NTC), Workforce Investment Board WIB). Review the MOUs to determine if they address critical aspects or responsibilities of the relationship.

Conduct interviews with partners to determine the effectiveness and mutual benefits of the relationship. (See interview guides in Appendix B (3.4 – Employer Interview, 3.5 – City Official Interview, 3.6 – Community Linkage Interview).

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Rationale for Rating:

R7. **Business and Community Liaison Staff**

Centers will have staff designated by the Center Director to carry out the Business and Community Liaison (BCL) functions. Liaisons may represent more than one center, with Regional Office approval, where it is more effective and practical to do so.

Responsibilities of the Liaison function are to:

a. Establish and develop meaningful relationships and networks with local and distant employers, applicable American Job Centers, local WIBs, and other Workforce Investment Act (WIA) partners to promote and provide job opportunities for graduates.

b. Establish and develop meaningful relationships with members of the local community to keep them informed about the projects of the Job Corps center and changes to the rules, procedures, or activities of the center that may affect the community, and planning events of mutual interest to the community and the Job Corps center.

c. Provide support to the Center Industry Council (CIC) and Community Relations Council (CRC).

Strategy:

- Interview the BCL. Does this individual understand his or her function, particularly to establish partnerships with local and distant employers? Request a list of activities and employer partnerships that have been established.
Conduct interviews with employer partners to determine the mutual benefits of the relationship (see Appendix B, 3.4 – Employer Interview).

Review bylaws and meeting minutes of the CRC and CIC.

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Rationale for Rating:

R8. Industry Councils

a. Establish Industry Councils
   1. Each Job Corps center must establish a Center Industry Council. Members of the council will be appointed by the Center Director in consultation with the staff who performs the BCL functions.
   2. Where it can be justified that a single Industry Council can more effectively represent employers for more than one center and/or represent multiple labor markets to which students will return, the Regional Office may approve such an arrangement.

b. Composition
   1. A majority of the council must be local and distant employers who have substantial management, hiring, or policy responsibility, and represent businesses with employment opportunities that reflect the employment opportunities in the communities where students seek employment.
   2. Other members must include representatives of labor organizations (where present) and/or other organizations representing employees, and students and graduates of Job Corps. Efforts should be made to include representatives from local WIBs as well.

c. Responsibilities
   1. The Industry Council will work closely with all applicable local boards to identify and recommend to the Center Director appropriate career technical training for the center, and will meet at least once every 6 months to:
      (a) Review relevant labor market information to identify employment opportunities in communities where graduates will seek
employment, and the skills and education necessary for those employment opportunities.

(b) Reevaluate labor-market information and recommend appropriate changes in center career technical training offerings and/or curricula.

2. Center Directors must:
   (a) Maintain regular contact and share information with council members;
   (b) Provide recommendations made by the council to the Regional Office at least once every 6 months;
   (c) Document attendance and recommendations of the Industry Council.

Strategy:

➢ Ask for a copy of the Industry Council membership and the minutes of the meetings. Is membership reflective of PRH requirements? How often are meetings held? Where? What is the purpose of the meetings? Who runs the meetings?

➢ Determine if council recommendations have been implemented by the center.

➢ Conduct interviews with CIC members to determine the effectiveness of the CIC (see Appendix B, 3.4 – Employer Interview, or 3.6 – Community Linkage Interview).

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Rationale for Rating:

R9. **Community Relations Council**

Centers will establish a Community Relations Council (CRC) to serve as a liaison between the center and the surrounding communities. The CRC will have the following features:

a. Be representative of business, civic, and educational organizations; elected officials; law enforcement agencies; and other service providers, including organizations and entities that serve targeted populations;
b. Include student and staff representatives;

c. Meet at least once per quarter to consider issues of mutual interest to the center and the community;

d. Records of CRC meetings will document attendance and recommendations.

**Strategy:**

- Ask for a copy of the CRC membership and the minutes of the meetings. Is membership reflective of PRH requirements? How often are meetings held? Where? What is the purpose of the meetings? Who runs the meetings?

- Determine if council recommendations have been implemented by the center.

- Conduct interviews with CRC members to determine the effectiveness of the CRC (see Appendix B, 3.6 – Community Linkage Interview).

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**Rationale for Rating:**

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**R10. Community Projects**

Centers will:

a. Participate in projects that benefit the community and provide a positive public image.

b. Provide opportunities for staff and students to participate in community service projects on a regular basis.

c. Ensure that all such projects and opportunities are accessible and available to individuals with disabilities.

**Strategy:**

- Ask for details on community projects conducted during the past year. Who initiated the requests for participation? Who participated? Outcomes? Were the projects mutually beneficial?
If possible, visit community projects or interview recipients of community service to determine the effectiveness and benefits of participation.

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Rationale for Rating:

QUALITY INDICATORS

Q1. Job Corps is viewed as a positive alternative for youth by schools and the employment and training community.

Strategy

➢ Review monthly reports of outreach activities to determine who was contacted (e.g., high schools/guidance counselors).

➢ Interview local youth, industry, One-Stop, and community organizations, including state workforce entities. What is their knowledge of Job Corps?

➢ Do ACs have up-to-date information regarding Job Corps? Have they been on a tour of a Job Corps center?

➢ Interview students. Did they receive accurate information prior to enrollment?

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Rationale for Rating:

Q2. Job Corps is known and recognized as an integral part of state and local workforce systems.
Strategy:

- Interview local workforce development organizations. How do they describe their relationship with the center? Interview center management staff to determine what the center and operator believe their roles to be in the state workforce development system. What have they done to ensure coordination of efforts?

- Interview the Center Director and key management staff. Which key staff are members of WIA boards and local youth councils?

- Review outreach files. Are there files demonstrating periodic contact with a variety of referral sources, organizations, and associations, including American Job Centers, schools, community organizations, and youth organizations? Is there a relationship with these resources? Do the files cite the names of the current liaisons? Do they describe the nature of the various contacts and necessary follow-up?

- Is there documentation about the number of referrals to Job Corps by agency? Is there a regular method of communication with agencies?

- Does the center give feedback to the referring agency about how the students it referred are doing? How do the AC and center staff work with the referring agencies when a student does not arrive as scheduled, or when the student is having difficulty adjusting?

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Rationale for Rating:

Q3. The local community supports and endorses the Job Corps center.

Strategy:

- Review local news coverage; track over an extended period of time.

- Interview the Center Director and key management staff. What specific efforts have been taken by management to strengthen relationships with local employers and community leaders?
Does key center management staff participate in the local chamber of commerce and other business and labor-related community organizations? Describe the level of participation and how it supports CDSS.

Interview OA staff members. Determine whether they feel they get necessary information from centers. Is it timely? If the answer is no, what are OA staff or centers doing to correct the problem? Interview center staff members if the OA contract is part of a center contract. Inquire how they keep ACs informed about changes on center, and other important information.

What is the center’s operating procedure for reporting negative community incidents to the news media? What is the most recent example, and how was it handled? Were media representatives notified? The Regional Office? Do significant incident reports reflect appropriate response to negative publicity concerns?

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Rationale for Rating:

Q4. Employer input is sought and used by the Job Corps center.

Strategy:

Do the CIC minutes reflect a focus on the development of relevant training programs that would support direct career transition to employment with local businesses?

When was the last Career Technical Training change made on center? Look for documentation of support from the Industry Council.

How does the CIC work with local representatives to ensure Job Corps offerings reflect the current needs of the labor market?

Review the membership listing of Industry Council representatives. Do they represent management with hiring or policy authority?

Find out if the center has a plan or systematic approach for involving employers. Determine if the center has a train/hire arrangement with employers.
Interview CTT instructors and career transition specialists to determine whether they are receiving feedback from employers and taking action regarding that feedback.

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Rationale for Rating:

Q5. Media coverage portrays a positive and fair image of the program.

Strategy:

- Does the center maintain a media log? Is it complete? Compare the media log to local news reports about the center.
- Determine how often OA/center operators attempt to supply human interest stories and information to the media. Review recent newspaper/newsletter articles to find out how the media publicize Job Corps.
- Review the public relations plan or strategy. Is the plan being followed? Is it successful? How are strategies in the plan monitored?

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Rationale for Rating:

Q6. The pool of applicants to the Job Corps center reflects the diversity of the community in which the center is located in terms of gender, race, ethnicity, and disability status.

Strategy:
➢ Review center OBS using the Executive Information System (EIS).

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Rationale for Rating:

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PRH 1.1 - Summary Rating

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1.2 OUTREACH AND ADMISSIONS PROVIDER RESPONSIBILITIES IN THE ADMISSIONS PROCESS

PURPOSE

P1. To assess, verify, and document applicant eligibility for the Job Corps program.
P2. To enroll eligible youth who can benefit from the Job Corps program.
P3. To establish procedures for assignment of applicants to centers in accordance with the specifications outlined in the OA contractor’s Statement of Work.
P4. To ensure a regular flow of applicants for assignment to centers that meets or exceeds the contractual goals.
P5. To provide applicants with accurate information about the Job Corps program.
P6. To ensure that assigned applicants are fully prepared for successful enrollment.
P7. To comply with applicable legal requirements.

REQUIREMENTS

R1. Interacting With the Applicant

a. ACs must communicate by telephone, email or mail, with each applicant referred by the National Call Center within 3 business days of receipt of the prospect list, constituent issues or voice mail message.

b. ACs shall obtain, through a face-to-face interview, whenever possible, with each applicant, pertinent data to make a determination of eligibility. Essential Admissions Requirements (EAR) are the basic requirements necessary for participation in the Job Corps program as enacted in the WIA, and in the federal regulations interpreting that Act. The OA staff will be responsible for determining whether an applicant meets each EAR. The EAR, as described in detail in Exhibit 1-1 of the PRH, must be applied equitably to all individuals who apply to the Job Corps program and may not be replaced, revised, or changed, except for policy changes issued by the Office of Job Corps through the official process. The AC must recruit and screen enough applicants to generate a sufficient number of arrivals to maintain the designated Job Corps center(s) at an average on-board strength of 100 percent of design capacity, in accordance with the delivery schedule outlined in the OA contract.

c. Communicating With Applicants and/or Parents, Guardians, or Other Representatives Who Have Disabilities

1. ACs must take appropriate steps to ensure that their communications with applicants (and/or applicants’ parents, guardians, or other representatives)
who have disabilities are as effective as communications with others. This obligation, which is separate from the reasonable accommodation obligation, is described in detail in Appendix 606. Even before taking the actions described in that appendix, ACs need to know that if they receive a request for auxiliary aids and services (communication aids) for a person with a disability, they:

(a) Must address the request immediately; and

(b) Must not begin, or continue with, any part of the admissions process until some sort of communication aid has been provided that is acceptable to the person for whom the auxiliary aid and/or service is being requested.

d. Accommodations for Admissions Process

1. A qualified applicant with a disability is entitled to request and receive reasonable accommodation at any time during the admissions process. If the applicant is requesting reasonable accommodation to participate in the admissions process, the AC:

(a) Must address the applicant’s accommodation needs immediately; and

(b) Must not begin, or continue with, any part of the admissions process for which the applicant has requested accommodation until the accommodation has been provided. Other parts of the admissions process may go forward if they do not directly involve the applicant’s participation, or if the applicant states that he or she does not need accommodations for those parts.

2. Requirements for providing reasonable accommodation to participate in the admissions process, including the circumstances under which the AC may ask for documentation of the need for the accommodation, are explained in Appendix 106.

3. Even if the applicant requests accommodation for the admissions process, the AC:

(a) Must not ask whether the applicant will need accommodation to actually participate in Job Corps;

(b) Must not assume that the applicant will need accommodation to participate in Job Corps;

(c) Must not ask for any disability-related information except at the times, and under the circumstances, that are described elsewhere in this chapter;

(d) Must not take the applicant’s disability into consideration in determining whether he or she meets the eligibility requirements or other factors for enrollment in Job Corps, except as described in Section 1.2, R7.b; and
(e) Must document the request for reasonable accommodations in accordance with Job Corps reasonable accommodation guidelines (see Appendix 106).

4. The AC will inform each applicant of his or her right to request and receive reasonable accommodation at any time during the admissions process and then review the Job Corps Reasonable Accommodation Request Form-Admissions (see Appendix 106) with the applicant. If the applicant wants to request an accommodation to participate in the admissions process, the Job Corps Reasonable Accommodation Request Form-Admissions should be completed. The AC may assist with the completion of the form as necessary.

e. The Application Process for LEP/ELL Persons. ACs must take reasonable steps to provide meaningful access to the application process for persons who have a limited ability to read, write, speak, or understand English. These persons are referred to as English Language Learners (ELL) or Limited English proficient (LEP). The steps that must be taken should be described in the OA contractor’s LEP/ELL Readiness Plan, as described in Section 1.1 R1.h. On the Record Applicant Preference Screen in OASIS, ACs must document if the applicant is learning English in the English Language Learner (ELL) selection area. The following criteria should be used to determine if a student is considered ELL/LEP:

1. English is not the applicant’s primary language and he or she cannot communicate clearly in English;
2. The initial interview requires an interpreter;
3. The applicant will need language support in order to fully participate in the program; or
4. The applicant self-identifies as needing language assistance or instruction.

Strategy:

- Conduct interview with management and AC to determine their understanding of the EAR.
- Ask the AC to describe the accommodation process.
- Review auxiliary aids and materials provided to LEPs.

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Rationale for Rating:

R2. Provision of Accurate Information About Enrollment Process and Rights

Admissions Counselors must provide every applicant with accurate information about the Job Corps enrollment process, and his or her rights in that process. That information must include, at a minimum:

a. The process for admissions determination and assignment to a center of qualified applicants for enrollment.

b. The rights of students to:
   1. Privacy;
   2. Confidentiality of personal information, including medical and disability-related information;
   3. Nondiscrimination and equal opportunity, including:
      (a) Communication aids and reasonable accommodations for persons with disabilities (see Appendices 601, 602, 605, and 606);
      (b) Information and services in languages other than English for LEP/ELL individuals as described in the OA contractor’s LEP/ELL Readiness Plan referred to in Section 1.1, R1.h; and
      (c) Religious accommodation.

c. A copy of the WIA “Equal Opportunity Is the Law” notice that contains accurate information about where the applicant may file a discrimination complaint (see Exhibit 6-11). The notice must be:
   1. Signed and dated by the applicant, and a copy placed in the applicant’s file;
   2. Provided in alternate formats to applicants with visual impairments and other disabilities (see Appendix 606). Where the notice has been provided in an alternate format, a record that an alternate-format notice has been given must also be made a part of the applicant’s file. This record should indicate the format in which the notice was provided.
   3. Provided in appropriate languages for LEP/ELL individuals, as described in the OA contractor’s LEP/ELL Readiness Plan referred to in Section 1.1, R1.h.
4. Posted prominently, in reasonable numbers and places, in the OA’s facilities.

d. That enrollment in Job Corps is voluntary for each individual.

Strategy:

- Interview ACs and determine enrollment process. If possible, sit in on an orientation process. What information is provided to applicants?

- Interview management staff to determine their understanding of the application process.

- Observe an applicant interview. Is the AC conducting the interview in a professional manner? Does the AC explain that two of the EAR questions may result in answers disclosing that the applicant has a disability?

- Review copies of written explanation provided to applicants who are denied.

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Rationale for Rating:

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R3. **Information on Center Life**

ACs must provide applicants with accurate information about:

a. Living arrangements.

b. Student conduct standards and expectations, including Job Corps’ drug testing policy.

c. Career Success Standards, including center expectations for student behavior and information on regular evaluation of student progress.

d. Center life, including community service activities, recreational activities, Student Government Association (SGA), and other center-supported activities, and

e. Allotment information to applicants with dependent children and childcare information, as applicable. (See Exhibit 6-2.)

Strategy:
Observe an orientation or admission interview. How are Career Success Standards explained to applicants?

Review outreach materials and other available information given to applicants. Do they focus on participation in Job Corps leading to jobs? Do they include rules, students’ expectations, and realistic goals?

Review the written materials provided to applicants to determine if they accurately reflect center facilities, training programs, dormitory conditions, recreational facilities, etc.

Review student satisfaction surveys. Are student responses about their experiences during the application process favorable?

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Rationale for Rating:

R4. **Career Development Services System**

ACs must inform applicants about the Job Corps CDSS describing, at a minimum, the CDSS components, including:

a. Personalized career planning assistance;
b. Preparation for career development;
c. Career development combining academic, career technical training, social, and employability skills training in both center-based and work-based settings to meet each student’s individual needs;
d. Career transition support; and
e. Program expectations and graduation requirements.

Strategy:

- Interview new students. How were they informed about CDSS? How were they assisted in choosing their career technical or career training preferences? Are they aware of the labor market outlook for their career choice?

- Observe an admission interview. Is CDSS presented clearly? Is the Personal Career Development Plan explained?
➢ Review any written materials provided to students to determine if they accurately depict the CDSS process.

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Rationale for Rating:

R5. **Personal Career Development Assistance**

ACs must assist applicants in initiating career planning by:

a. Discussing available career technical offerings, trade requirements, and waiting lists.

b. Identifying certification, accreditation, and licensure opportunities and, if applicable, associated training and experience requirements or other prerequisites.

c. Providing accurate information about (1) the requirements to achieve the expectations of each TAR such as the length of stay, and (2) the increased salary opportunities associated with certificates, credentials, and licenses.

d. Using labor market information to advise applicants regarding the career outlook for his or her expressed career technical training interests and to assist applicants in selecting career technical training preferences.

e. Explaining the use of the Personal Career Development Plan (PCDP) as a personalized blueprint, which will be used throughout enrollment and the Career Transition Period (CTP) to assist students in meeting their career goals (see Appendix 102).

Strategy:

➢ Review PCDPs to ensure ACs are using this as a career development tool.
How is AC discussing labor market information with applicant? Is it being used to help applicant choose the appropriate trade?

Interview students to determine their perceptions regarding the use of the PCDP and the assistance they received from the OA staff.

Interview Admissions Counselor. Are ACs familiar with center-specific technical offerings, waiting lists, and certification opportunities?

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Rationale for Rating:

**R6. Collection and Handling of Education-Related Information and Documents**

ACs must:

a. Collect, maintain, and transmit education-related information and documents as follows:
   
   1. Include copies of one or more of the records in the list below, if available, in the applicant’s file.

   (a) An official school transcript with the school’s seal affixed. If the applicant states that he or she has a high school equivalency (HSE) credential, a copy of the HSE certificate or official HSE test scores.

   (b) If the applicant states that he or she completed the 12th grade and obtained a diploma, a copy of an acceptable high school diploma (HSD) or official high school transcripts indicating graduation. An acceptable diploma is one described in EAR E in Exhibit 1-1, documentation requirements for Education/Training/Family Needs.

   (c) May indicate in an applicant’s records that the applicant has an HSD only after receiving a copy of one or more of the following documents.
(1) A regular/standard HSD;
(2) An honors diploma;
(3) An Individual Education Plan (IEP)/special education diploma;
(4) Official transcripts indicating graduation from a school that meets the guidelines set in PRH Appendix 304; and/or
(5) A foreign diploma.

2. When filing, storing, and transmitting IEP, Section 504 plans, IEP/special education diplomas, similar documents, or any documents indicating that a particular applicant has such documents, strictly comply with the following legal requirements related to medical and disability-related information, as explained in Appendix 607.

(a) Place these records in separate “health records” files that are kept and stored separately from all other information about the individual applicant until the records are sent to the center.

(b) Carefully limit access to these documents. For example, keep hard copies of the documents in locked files; ensure that electronic copies of the documents are password-protected. Be vigilant about who is permitted to know the password, or to have access to the key or combination that opens the lock. Appendix 607 explains what categories of persons are legally authorized to have access to the documents.

(c) Transmit hard copies of the documents in sealed envelopes in accordance with Appendix 607. Make the best effort to ensure that the copies are delivered only to persons who are authorized to have access to those specific types of documents.

b. If the applicant has not provided copies of the required official records, take the following steps:

1. Contact either:
   (a) The appropriate state HSE administrator (see Exhibit 1-1, Section E: Education, Training, Family Needs); or
   (b) The last high school the applicant attended; and

2. Send the administrator or school a Records Release Authorization (Exhibit 1-5), signed by the applicant offered enrollment or his or her parent or guardian, requesting that the required official records be delivered to the OA office or Job Corps center.

c. Before an applicant departs for his or her center of assignment, ensure that the center has received either the official records listed above, or documentation of
the official request. This documentation must include contact information for the HSE administrator or school from which the records have been requested.

Strategy:

 Review SOPs for the collection and handling of education-related information and documents.

 Ask AC to describe the process for handling documents that contain medical/disability information.

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Rationale for Rating:

**R7. Essential Admissions Requirements**

Use Exhibit 1-1 to determine if each applicant to Job Corps meets the EAR necessary to provide a conditional offer of enrollment. Start with EAR A and determine if the applicant has met that EAR. Continue in sequential order through Exhibit 1-1. *Exhibit 1-1 was revised effective August 5, 2011, and all Outreach and Admissions staff must ensure that the current version of Exhibit 1-1 is being used.*

a. Before beginning the EAR process, the AC must explain to *every* applicant, and his or her parent, guardian if a minor, or other representative, that two of the EAR questions (those related to age and low-income status) may result in answers disclosing that the applicant has a disability. The AC must also explain the four principles that apply to all medical and disability-related questions in Job Corps. See Section 1.2, R7.b, below.

b. Asking About a Disability

In general, ACs may not ask whether an applicant is an individual with a disability or about the nature and severity of a disability prior to conditional enrollment in Job Corps. (An applicant is conditionally enrolled in Job Corps when additional documentation or information is needed to confirm that the applicant meets all the admissibility requirements.) At two points in the process of determining eligibility, however, ACs may invite an applicant to disclose whether he or she has a disability:
1. If the applicant is, or will be, over 24 years old on the date of enrollment, the maximum age limit may be waived if he or she is a person with a disability.

2. If the applicant would not meet the low-income requirement unless the applicant is considered a “family of one” because of a disability. The AC should explain to the applicant that under the law, he or she may be considered a “person with a disability” if:

   (a) He or she has a physical or mental impairment; and
   (b) The impairment affects one or more of his or her major life activities. The term “major life activities” refers to activities that are of central importance to daily life, e.g. caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, leaning, and working; and
   (c) The effect of the impairment is substantial.

3. Before inviting the applicant to disclose whether he or she falls into this category, the AC must explain to the applicant that:

   (a) Providing disability-related information is voluntary – in other words, the applicant is not required to disclose whether he or she has a disability; and
   (b) The information will be kept confidential as required by law; and
   (c) Declining to disclose whether he or she has a disability will not cause the applicant to receive unfavorable treatment (except that if the applicant decides not to disclose, there is a possibility that he or she will not be found to meet the age requirements and/or qualify as low income); and
   (d) The information will be used only in accordance with the law.

The same four pieces of information, (a) – (d) above, must be provided whenever an applicant is about to be asked a question and the answer to the question is likely to lead to disclosure of a disability.

The AC should explain to the applicant that when he or she is asked whether he or she falls into the category of an individual with a disability, the applicant should select only one of three possible answers: Yes, No, or Do not wish to answer. If the applicant’s response is “yes,” the AC:

- Must not use this information to determine the applicant’s admissibility under any factors other than age or low-income status.
- Will continue with the admissions process and no other information regarding the disability will be requested or collected until and unless the applicant is notified that he or she has been determined eligible and selected for enrollment in Job Corps or
unless the applicant asks for reasonable accommodation for the admissions process.

After the applicant is notified that he or she has been determined eligible and selected for enrollment in Job Corps, the AC will secure any corresponding supporting medical and/or educational documentation. The AC must not review the contents of this information, and must place all medical documents and/or all special education and/or disability documentation in a separate envelope. The envelope must be sealed and included with the applicant file that is forwarded to the center for review. See Appendix 607. As part of the file review process, the center will then ensure that the applicant has a disability, and therefore meets the age EAR or can be considered as a family of one for the low-income EAR. If a center determines that the applicant has a disability, the center review of the applicant file will continue. If the center determines that the applicant does not have a disability, the applicant file will be returned to the OA contractor who will inform the applicant that he or she is not qualified for enrollment as described in Section 1.2, R10c.

c. If there is any EAR that the applicant does not meet, stop the application process at that point, because the applicant is not qualified for admission to Job Corps. The AC must provide a written explanation of the denial to the applicant (see Appendix 104). This explanation must inform the applicant about his or her right to file an appeal with the Outreach and Admissions agency or the Job Corps center. The explanation must also inform the individual of his or her right to file a discrimination complaint with either the recipient of the funds as defined in 29 CFR 37.4, such as the Outreach and Admissions agency or the Job Corps contractor, or center operator, if not federally operated, or the Director of the U.S. Department of Labor Civil Rights Center (DOL-CRC) if the applicant feels he or she was discriminated against during the application process.

d. Overview of Essential Admissions Requirements
Following is a list of the EAR for Job Corps. This list provides only a brief outline of each requirement; it does not contain all of the information an AC must have in order to properly make a determination about whether a particular applicant meets each requirement. That information is found in Exhibit 1-1.

To be determined qualified for Job Corps, each applicant must:

1. Meet the age requirements: Be at least 16 years of age and not more than 24 years of age on the date of enrollment (i.e., date of departure for a center). For an individual with a disability who is otherwise eligible, the maximum age limit may be waived (minimum age is still 16). Therefore, this EAR will require the AC to invite an applicant older than 24 to disclose whether he or she has a disability. See Appendix 606.
2. Meet the Selective Service Registration requirement, if applicable: If the applicant is male, he must sign a consent form for automatic Selective Service Registration.

3. Meet the citizenship and residency requirements: Be a:
   (a) United States citizen or national, including a naturalized citizen; or
   (b) Lawfully admitted permanent resident alien, refugee, asylee or parolee, or other immigrant who has been authorized by the Attorney General to work in the United States; or
   (c) Resident of a U.S. territory.

4. Qualify as “low income” as described in Exhibit 1-1. **Documentation must be collected verifying that the applicant meets the low income criterion.** This EAR will require the AC to invite an applicant who does not meet the standard “low income” requirement to disclose whether he or she is a person with a disability who would meet the requirement under the disability waiver. See Appendix 606.

5. Meet the education/training/family needs requirements: Be an individual who has one or more of the following barriers to education and employment:
   (a) Is a school dropout.
   (b) Requires additional education, career technical training, or intensive career counseling and related assistance, in order to participate successfully in regular schoolwork or to secure and hold employment.
   (c) Is basic-skills deficient: Has English reading, writing, or numeracy skills at or below the 8th grade on a generally accepted standardized test, or a comparable score on a criterion-referenced test.
   (d) Is homeless and in alignment with the U.S. Department of Education’s definition of homeless children and youths:
      - Individuals who lack a fixed, regular, adequate nighttime residence (within the meaning of section 103(a)(1)); and
      - Includes:
         (i) Children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
(ii) Children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C));

(iii) Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) Migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances describes in clauses (i) through (iii).

(e) Is considered a runaway or foster child.

(f) Is a parent: an individual who, in law, has custody, guardianship, or access rights in regard to a child and who may have corollary obligations to financially support a minor, typically by way of child support.

6. Sign, or have a parent, guardian if a minor, or other representative sign, the “Authorization for Use and Disclosure of Your Health Information.”

7. Receive parental consent, if applicable: If the applicant is an unemancipated minor, his or her parent or legal guardian must provide consent for him/her to participate in Job Corps. Exhibit 1-1 describes how to determine whether the applicant is an emancipated minor.

8. Have child care, if applicable: If the applicant is a parent, he or she must certify that he or she has made suitable arrangements for child care.

9. Meet program suitability requirements: The Job Corps program must be the program that can best meet the applicant’s education and training needs, as described below. Exhibit 1-1 contains a detailed explanation about how to make these determinations.

(a) If the applicant has not graduated from high school:

(1) The applicant wants to earn a high school diploma or high school equivalency (HSE) credential and participate in career technical training (the applicant must indicate a desire to obtain both academic and career technical training); and

(2) After graduation from Job Corps, the applicant intends to:
   · Obtain employment; or
   · Enter the military; or
· Continue his or her education.

(b) If the applicant is a high school graduate:
   (1) The applicant wishes to obtain career technical training; and
   (2) After graduation from Job Corps, the applicant intends to:
       · Obtain employment; or
       · Enter the military; or
       · Continue his or her education.

10. Meet the requirements related to group participation and understanding of rules.
    The criteria that the applicant must meet, and the questions that the AC must ask
    the applicant in order to determine whether he or she meets these requirements,
    are described in detail in Exhibit 1-1.

11. Meet the requirements related to interference with other students’ participation.
    The assessment of the applicant’s behavior that the AC must make in order to
    determine whether he or she meets these requirements is described in detail in
    Exhibit 1-1.

12. Meet the requirements related to community relations. The specific requirements,
    and the questions the AC must ask the applicant in order to determine whether he
    or she meets these requirements, are described in detail in Exhibit 1-1.

13. Not have court involvement or be under agency supervision: Is not on probation
    or parole, under a suspended sentence, or under the supervision of any agency as a
    result of court action or institutionalization, to the extent that he or she will be
    prohibited from participating in the program. The steps that the AC must take to
    determine whether the applicant meets these requirements are described in detail
    in Exhibit 1-1 and Appendix 103. Following is a brief description of the
    determinations the AC must make:

    If the applicant is:
    (a) on probation, or
    (b) on parole, or
    (c) under a suspended sentence, or
    (d) under the supervision of any agency as a result of court action or
        institutionalization,

    then, all of the following must be certified by the appropriate court or agency:
    • The court or agency will approve of the applicant’s release from its
      supervision; and
    • The applicant’s release does not violate applicable statutes and
      regulations; and
    • The applicant has responded positively to supervision; and
• The court or agency will permit the applicant to leave the local area or state while he or she is enrolled in Job Corps.

If the applicant has court fines or court-ordered restitution in excess of $500, then one of the following requirements must be met:

• The applicant must settle the court fine or court-ordered restitution prior to enrollment; or

• The court must agree to suspend the obligation during the applicant’s enrollment in Job Corps; or

• The Regional Office of Job Corps grants a waiver and permits entry.

14. Meet the requirements related to maintenance of sound discipline. The background checks that must be conducted, and the documentation the AC must review to determine whether the applicant meets these requirements, are described in detail in Exhibit 1-1.

Once the AC has completed the EAR process, if the AC makes a decision that the applicant meets the essential admissions requirements, a conditional offer of enrollment will be made and the applicant will be assigned to a center. The AC will then:

• Ask the applicant to complete the Job Corps Health Questionnaire (ETA 653).

• Inform each applicant of his or her right to request reasonable accommodation and review the Reasonable Accommodation Request Form with the applicant. (See Appendix 605). If the applicant wants to request accommodation, the request form should be completed. The AC may assist with the completion of the request form as necessary.

Secure any corresponding supporting medical and/or educational documentation. The AC must not review the contents of this information, and must place all medical documents and/or all special education and/or disability documentation in a separate envelope. That envelope must be sealed and included with the applicant file that is forwarded to the center for review. See Appendix 607.

Strategy:

➢ Observe an applicant interview. Are applicants encouraged to become graduates? How is the applicant’s commitment to the program ascertained? Did the AC provide information on various topics (career technical offerings, academics, dorm life, etc.)? Did the AC follow up on unclear answers and explore comments made by applicant?

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Rationale for Rating:

**R8. Priority Enrollment**

An applicant who meets all of the Essential Admissions Requirements listed above, and who is a veteran of the Armed Forces of the United States or an eligible spouse of a veteran (as specified in Exhibit 1-6), will receive priority in enrollment at Job Corps centers. Those applicants who qualify for priority enrollment will be offered the opportunity to enroll in the program before all other applicants.

As warranted, the National Director of Job Corps may initiate the “expedited enrollment” policy for victims of natural and man-made disasters. As directed, Outreach and Admissions agencies serving affected areas should follow the procedures outlined in Exhibit 1-8.

Strategy:

- Ask management to provide statistics on the number of veterans or spouses of veterans that have been given priority enrollment.

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Rationale for Rating:

- Ask management to provide statistics on the number of natural-disaster victims who have been given expedited enrollment.

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Rationale for Rating:

R9. Documentation

ACs must:

Enter all information involving applicant admissions criteria in the OASIS in accordance with the procedures specified in the OASIS documentation.

a. Use the procedures described in Exhibit 1-1 to verify, assess, and document information relating to applicant admissions criteria.

b. Use the procedures described in Exhibit 1-2 to provide documentation to Job Corps centers for their use in assessing applicants’ health needs.

Strategy:

➢ Interview management and ACs to determine if a quality control system is in place to ensure accurate documentation.

➢ Print a sample pending arrival list. Review these files in OASIS for accuracy and compliance with requirements.

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Rationale for Rating:

R10. Admissions Notification

ACs must advise all applicants of the results of the admissions determination.
a. If the applicant is qualified for enrollment, offer conditional enrollment to the applicant and advise the applicant that:

1. He or she will be assigned to a Job Corps center.
2. The AC will collect medical information about the applicant and transmit it to the Job Corps center, along with the applicant’s file.
3. If the applicant offered enrollment has an apparent or known disability, the AC may ask whether he or she will need a reasonable accommodation to participate in Job Corps. Before the applicant responds, the AC must explain that:
   (a) Providing disability-related information is voluntary – in other words, the applicant is not required to disclose whether he or she has a disability; and
   (b) Choosing not to disclose a disability, or to ask for a reasonable accommodation at this point, does not preclude him or her from asking for an accommodation at any point later in the enrollment process or during his or her participation in Job Corps; and
   (c) Disability-related information will be kept confidential as required by law; and
   (d) Disclosing whether he or she has a disability will not cause the applicant to receive unfavorable treatment; and
   (e) The information will be used only in accordance with the law.

b. To request a reasonable accommodation, the applicant offered enrollment must complete the Job Corps Reasonable Accommodation Request Form (see Appendix 605). Responses to questions on the form must be provided by the applicant offered enrollment and/or his or her parent, guardian, or other representative, although the AC may help in filling out the form. The AC must place the completed form in a separate file for medical and disability-related information about the applicant. This file must be stored separately from other information about the applicant, and must be kept confidential, as explained in Appendix 607.

c. If the applicant is not qualified for enrollment, take the following steps:

1. Inform the applicant that he or she has been determined not to meet the specific admission requirement(s). Provide the applicant with a clear, documented, written explanation for the determination (see Appendix 104).
2. Inform the applicant of his or her rights, as follows:
   (a) If the applicant believes that he or she has been denied admission as a result of discrimination on a protected basis (race, color, religion, sex/gender, national origin, age, disability, political
affiliation or belief, citizenship, or participation in a program or activity financially assisted under WIA Title I), he or she may file a written complaint within 180 days, either with the recipient of the funds as defined in 29 CRF 37.4, such as the Outreach and Admissions agency or the Job Corps contractor, or center operator (if not federally operated) or with the Director of the U.S. Department of Labor Civil Rights Center (DOL-CRC). Provide the applicant with the contact information of both the recipient and the Director of DOL-CRC. DOL-CRC’s information is as follows:

Director, Civil Rights Center
U.S. Department of Labor
200 Constitution Avenue, NW
Room N-4123
Washington, DC 20210
Phone: (202) 693-6502
TTY: (202) 693-6516
CivilRightsCenter@dol.gov

If the applicant files with the recipient of the funds as defined in 29 CRF 37.4 and is dissatisfied with the result, he or she has 30 days to file a new complaint with DOL-CRC. Likewise, if the applicant fails to receive a written Notice of Final Action from the recipient within 90 days of filing a complaint, then the applicant need not wait for the recipient to issue that Notice before filing with DOL-CRC. However, the applicant must file with DOL-CRC within 30 days of the 90-day deadline.

(b) If the applicant believes that he or she has been wrongfully found unqualified for reasons unrelated to discrimination, he or she may file an appeal with the OA agency or the Job Corps center within 60 days of the determination. Provide the applicant with the name and address of the OA agency and the appropriate Job Corps center with whom the appeal must be filed, and explain the time frame and deadline for appealing. A hearing must be conducted within 30 days of when the appeal was filed.

The OA agency must establish procedures for the review of appeals. The procedures must include at a minimum the following steps:
- Designate a Point of Contact at the OA corporate office
- Create an appeal review panel consisting of at least one corporate staff member and one contract staff member
- Conduct a verification call with applicant
- Review final determination with Admissions Counselor and Quality Assurance Manager
- Submit written decision to applicant and send copy to
Regional Office

The OA agency or Job Corps center must issue a decision on the appeal within 60 days of when the appeal was filed. If the OA agency or Job Corps center denies the appeal within 60 days of when the appeal was filed, the applicant may appeal the denial to the Job Corps Regional Director within 60 days of the date of the denial. If the OA agency or Job Corps center does not issue a decision on the appeal within 60 days of when the appeal was filed, the applicant may file an appeal with the Job Corps Regional Director within 120 days from the date that he or she filed the original appeal.

Also notify the applicant that if the OA agency, Job Corps center, or Regional Office rejects the appeal, and the applicant believes that the agency, center, or Regional Office rejected his or her appeal for reasons of discrimination, he or she has 180 days from receipt of the determination letter to file a complaint with the DOL-CRC.

3. Refer the applicant to an appropriate One-Stop Center, or other training/educational resource in his or her home community.

4. On a monthly basis, submit no fewer than 5 percent of files of applicants denied admission to the Regional Office for a quality review. The quality review does not take place before the applicant is notified of the denial.

5. Regardless of whether the applicant is admitted or not admitted, copies of his or her records must be kept for a period of no less than three years from the close of the program year in which the determination was made. If the applicant files an appeal, or a complaint alleging that the admissions process was affected by discrimination or that the Workforce Investment Act (WIA) nondiscrimination requirements were violated during the process, copies of the records must be kept for a period of no less than three years from the date on which the complaint or appeal was resolved.

Strategy:

➢ Prior to the assessment, print out a copy of the Pending Arrival report from OASIS. Review case notes for students on the pending arrival report. Is pre-arrival contact by the AC documented?

➢ Does the operator have an SOP for maintaining contact with applicants and pending arrivals?

➢ How is contact maintained with centers to ensure that there is no undue delay in arrival to center?

➢ How does the AC inform an unqualified applicant of their right to appeal?
R11. Collection and Handling of Health-Related Information and Documents

ACs must:

a. Use the Job Corps Health Questionnaire (ETA 653) to collect health information about the applicant offered enrollment, along with any medically-connected documentation, as described in the instructions for the Job Corps Health Questionnaire (ETA 653).

b. Forward the originals of the Job Corps Health Questionnaire (ETA 653) of the applicant offered enrollment, and all documentation that has been collected, to the center of assignment. These documents must be forwarded in envelopes or files that are sealed and kept separate from any other information about the applicant offered enrollment.

c. For applicants who are not offered enrollment, retain copies of the Job Corps Health Questionnaire (ETA 653), and all related documentation that has been collected, in a file that is stored separately from any other information about the applicant. The Job Corps Health Questionnaire (ETA 653), the related documentation, and all other medical or disability-related information about the applicant must be kept confidential, and access to this information must be strictly limited to persons with a need to know, as described in Appendix 607.

OA agencies may retain copies of the ETA 652, Job Corps Reasonable Accommodation Request Form-Admissions (Appendix 106), applicant folder cover sheet, folder inventory, alternate contact sheet and a copy of documentation showing proof of low income eligibility. With the exception of Appendix 106, copies of these documents may be filed electronically.

Strategy:

- Review SOPs for the collection and handling of health-related information and documents.
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Rationale for Rating:

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**R12. Collection and Handling of Other Types of Required Documents**

ACs must help the applicant offered enrollment to make copies of the documents in the list below for use on center. The AC should either send these documents to the center or ensure that the applicant offered enrollment takes them with him or her when he or she departs for the center.

a. Social Security card or official document containing Social Security number (e.g., state ID, school record, tax record, W-2).

b. Driver’s license, if applicable and available.

c. Immigration and Naturalization Service (INS) alien registration card, if applicable.

d. Public assistance documentation, if applicable; e.g., records of Temporary Assistance for Needy Families or food stamps. If this documentation discloses that the applicant offered enrollment has a disability, and the AC plans to send the documentation to the center rather than having the applicant take it with him or her, the following requirements apply:

1. It must be placed in a separate “health records file,” and until it is sent, it must be stored separately from all other documents related to the applicant.

2. Hard copies of the documentation must be transmitted in sealed envelopes;

3. Access to the documentation must be strictly limited, as explained in Appendix 607.

e. Medical insurance card, if applicable.

f. Immunization records, if available. The transmission, storage, and confidentiality requirements described in Appendix 607 apply to these records.

g. Release entitled “Right to Use Photographic Likeness or Moving Images,” signed by the applicant offered enrollment, or by a parent or legal guardian if applicant is
a minor (see Appendix 601, Student Rights to Privacy and Disclosure of Information)

h. Form entitled, “Job Corps Informed Consent to Receive Mental Health and Wellness Treatment” signed by the applicant offered enrollment, or by a parent or legal guardian if the applicant is an unemancipated minor. (See Exhibit 1-4.)

Strategy:

- Interview center records staff. How often do students arrive on center without all the appropriate documentation?

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Rationale for Rating:

**R13. Assignment and Scheduling Procedures**

A note about accessibility considerations: Because all Job Corps centers are required to comply with applicable accessibility requirements, it is **unlawful** to assign an applicant offered enrollment to a particular center, or to steer such an applicant away from a center, based solely on accessibility concerns. Even if the law does not require a specific center to comply with federal architectural accessibility guidelines, the center may be required to provide reasonable accommodations to the needs of a particular individual’s disabilities if the accommodations are not an undue hardship.

If an applicant offered enrollment has disclosed a mobility-related disability, or has such a disability that is obvious (for example, if he or she uses a wheelchair), and the AC has concerns about the accessibility of the most suitable center, the AC may raise those concerns with the applicant and/or his or her parent, guardian, or other representative. In these cases, three points must be kept in mind:

- The AC should inform the applicant and/or his or her parent, guardian, or other representative that the applicant is entitled to ask for a reasonable accommodation, which may include a request for modifications to the center at issue;

- Job Corps’ Reasonable Accommodation Committee (RAC) is required to consult with the applicant to identify possible accommodations and must give consideration to the applicant’s choice of accommodation, but Job Corps is not
required to implement an accommodation that would impose an undue hardship; and

• The ultimate decision about whether the applicant will or will not accept a reasonable accommodation must be left up to the applicant and/or his or her parent, guardian, or other representative.

OA contractors must:

a. Assign applicants offered enrollment to the center closest to home except under the following conditions:

1. The applicant offered enrollment chooses a career technical training program that is not available at such center.

2. The applicant offered enrollment would be unduly delayed in participating in the Job Corps program because the closest center is operating at full capacity.

3. The applicant, or the parent or guardian of an applicant requests assignment to another Job Corps center due to circumstances in the home community of the applicant that would impair prospects for his or her successful participation in the Job Corps program.

b. Give priority in assignments of open slots to applicants offered enrollment who are veterans of the Armed Forces of the United States or eligible spouses of veterans, as specified in Exhibit 1-6.

Strategy:

➢ Interview management and ACs to determine their understanding of the assignment and arrival scheduling process.

➢ Does OA use the weekly or monthly OBS report to monitor available slots? Are they using the GAP? Are they determining center assignment based on PRH requirements?

➢ Interview ACs. Are they aware of Regional GAP? How do they determine the appropriate center for enrollment?

➢ Print out an arrival report for the past 6 months to one year (depending on OBS) and compare to GAP assignments. Does OA use the weekly or monthly OBS report to monitor available slots?

➢ Determine if ACs are cooperating with centers to review accommodation needs of applicants with disabilities. How?

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Rationale for Rating:

**R14. Applicant Files**
OA and center contractors must ensure that OASIS files are available to the center of assignment and that hard copy documents are available to the center at least 7 working days prior to each applicant’s scheduled arrival at the center, or departure to the center, if using government-furnished transportation.

Strategy:

- Interview center records staff to determine if files are received on center in a timely manner.

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Rationale for Rating:

**R15. Withdrawal of Application**
If an applicant withdraws his or her application, or an applicant offered enrollment chooses not to enroll, all supporting documentation should be maintained with the central file and returned to the OA agency. Files must be maintained for a minimum of 3 years from the end of the applicable program year. Health and disability-related documentation must be maintained in a separate file to which access is strictly limited, as described in Appendix 607.

Strategy:

- Request to see where the returned files of applicants are stored. Review one of the historical files.

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July 28, 2014
Q1. Quality assurance systems are in place to ensure that students admitted to Job Corps meet the essential admissions requirements for participation in the program.

Strategy:

➢ Pre-onsite: Review the number of fraudulent enrollments.

➢ Interview OA staff. Ask them to describe the processes for interviewing applicants and gathering documentation, reviewing and performing quality control on applications, and communicating with centers on the folder review and approval process. Do they encourage applicants to be on time for the admissions interview, and to dress appropriately? How?

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Q2. Applicants are assigned to centers in accordance with specifications outlined in the OA contractor’s Statement of Work (SOW).

Strategy:

➢ Review OA contractor’s SOW, and compare the contractor’s process for assigning applicants to centers.

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Q3. The AC has recruited and screened enough applicants to generate a sufficient number of arrivals to maintain the Job Corps center(s) at full design capacity.

- Review data from EIS to check OBS for center(s) assigned to OA contractor.
- Review OBS data and the Weekly Student Separation Report (WSSR), current and year-to-date. Are there adequate numbers of assignments being made? Is the “no-show” rate reasonable?

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Q4. There is a regular flow of applicants for assignment to centers.

Strategy:
- Review the Weekly Termination Rate (WTR) for center(s) assigned to the OA contractor, and compare with the flow of applicants.

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Rationale for Rating:

Q5. Applicants have been provided accurate information about the Job Corps program.

Strategy:

➢ Review outreach materials and other available information given to applicants. Do they focus on participation in Job Corps leading to jobs? Do they include rules, students’ expectations, and realistic goals?

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Rationale for Rating:

Q6. New arrivals have a basic understanding of Job Corps’ career development focus, how Labor Market Information can be used, and the career development services available to them through Job Corps.

Strategy:

➢ Interview new students. How were they informed about CDSS? How were they assisted in choosing their career technical or career training preferences? Are they aware of the labor market outlook for their career choice?

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Q7. Applicants can accurately describe the process for filing discrimination complaints and/or appeals if they are not accepted into the program or they believe they have been subjected to discrimination during the application process.

Strategy:

➢ Interview new students. Can they describe the complaints/appeals process?

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Rationale for Rating:

Q8. New arrivals have a basic understanding of their rights to nondiscrimination and equal opportunity, and know where and when to file complaints of discrimination.

Strategy:

➢ When interviewed, new students can explain their rights and when/where to file discrimination complaints.

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Rationale for Rating:

Q9. Applicant files are properly handled and maintained.

Strategy:

➢ Look at OA filing and storage system. Are sensitive materials such as medical and disabilities information kept separate and protected in accordance with the PRH?

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**Average**
1.3 DEPARTURE PREPARATION AND ENROLLMENT READINESS

PURPOSE

P1. To ensure that assigned applicants depart safely for centers.

REQUIREMENTS

R1. Pre-departure Activity

a. ACs must:

1. Provide each assigned applicant with specific, current information about the center of assignment, including location, rules, career technical training waiting lists, and program expectations.

2. Provide the assigned applicant with a travel packet to include itinerary, e-ticket information, meal money (if applicable), emergency phone numbers, and written guidance on acceptable behavior and expectations while on travel to the center (see Chapter 6, Section 6.6, Student Transportation).

3. Send all required documents to the center, or ensure that the applicant takes the documents with him or her when he or she departs for the center (see Section 1.2, R12).

4. Notify each applicant of his or her assignment date, or departure date if using government-furnished transportation, and the process for departure.

5. Verify with the applicant that there has been no change to the applicant’s admission status that would alter any of his or her answers to the EAR since the completion of the original application.

Strategy:

➢ Ask AC to provide a sample information packet given to applicants prior to departure.

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Rationale for Rating:
R2. Departure Scheduling and Procedures

ACs must:

1. Contact the assigned applicant to provide travel information, and answer any last-minute questions.

2. Whenever possible, accompany the applicant to the scheduled departure site or arrange for another responsible escort, and see that the applicant departs safely as scheduled.

3. As required in Section 1.1., R.3., request that the applicant sign a release of “Right to Use Photographic Likeness or Moving Images” and forward it to the center of assignment (see Appendix 601, Student Rights to Privacy and Disclosure of Information).

Strategy:

➢ Conduct interviews with new students to determine if they were contacted by an AC and provided with travel information prior to their departure.

➢ Review policies and procedures related to obtaining the release form, “Right to Use Photographic Likeness or Moving Images” and how it is sent to the center of assignment.

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Rationale for Rating:

R3. Delays

a. Travel Delay

In the event that an assigned applicant asks for a delay in the assigned day for travel to the center of assignment, the AC must take the following steps:

1. Determine whether the request for the delay is valid and reasonable, e.g., due to illness or death of an immediate family member.

   If the request is related to a disability, the AC should contact the center and ask that the appropriate center staff persons determine whether the delay is a reasonable accommodation for the disability, as explained in Appendix 605.
2. If the reason is unrelated to a disability, and the AC determines that the reason is valid and reasonable, notify the center, and obtain instructions and a future date of travel. This notification must take place either before or on the assigned travel date.

b. Delayed Assignment

Under the following circumstances, the AC may ask the center for a delayed assignment for assigned applicants who fail to depart as originally scheduled and who did not request a travel delay.

1. The AC determines that the reason for the failure to depart is valid and reasonable.
   (a) If the failure to depart is related to a disability, the AC should contact the center and ask that the appropriate staff persons determine whether the delay is a reasonable accommodation for the disability, as explained in Appendix 605.

2. The assigned applicant requests a delayed assignment date within 90 days of the original interview date. If the request is made after the 90-day period expires, all of the admissions documentation for the applicant offered enrollment must be re-verified.

3. The AC must verify with the assigned applicant that he or she continues to meet all the Job Corps admissions criteria as of the rescheduled date of enrollment.

c. Under no circumstances may an AC send an assigned applicant to the center on a day other than the departure date entered on the applicant’s travel itinerary without obtaining center and/or Regional Office approval.

Strategy:

- Interview management and OA staff to determine their understanding of the process for arrival delays.

- Are travel delays noted in OASIS in pending arrival reports? What is the procedure for notifying OA/center of travel delays? Is there an SOP for managing delayed assignments?

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Rationale for Rating:
**R4. No-Shows**

In the event that the applicant fails to depart for the center and does not communicate with the AC 24 hours prior to the scheduled arrival time, or 24 hours prior to the scheduled departure time if using government-furnished transportation, he or she will be determined to be a no show, and the AC must:

a. Contact the assigned applicant promptly to determine the reason he or she did not arrive at the assigned center.

b. If appropriate, in accordance with Section 1.3, R4, request a delayed assignment, and reschedule the applicant.

c. Notify the center of assignment of any delay.

**Strategy:**

- Review the follow-up that is made with no shows. Who is doing it? How is it documented? What are ACs doing with this information to improve the process?

- Look at trends in the number assigned/number arrived. Look at transportation issues, ticketing, and departure procedures.

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**Rationale for Rating:**

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**QUALITY INDICATORS**

Q1. Assigned applicants arrive at the center of assignment as scheduled.

**Strategy:**

- Review documentation of arrival rates. Determine if there is a lag of time between approval and time of arrival. Review procedures for assignment and arrival. Are they used?

- Ask ACs if they are aware of waiting time to get into career technical training.

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*July 28, 2014*
➢ Determine if ACs are analyzing the “no shows” and identifying trends by area.

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Rationale for Rating:

Q2. New arrivals know what to expect upon arrival and enrollment at the center.

Strategy:

➢ Interview recent arrivals. Do they believe they were adequately informed about what to expect upon arrival at the center?

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Rationale for Rating:

PRH 1.3 - Summary Rating

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1.4 CENTER RESPONSIBILITIES IN THE ADMISSIONS PROCESS

PURPOSE

P1. To establish procedures for applicant file review by centers.
P2. To establish procedures for the review of applicant health information.
P3. To ensure that all assigned students are contacted by the center prior to arrival.
P4. To establish procedures for assignment of applicants to centers in accordance with Regional Office procedures.

REQUIREMENTS

R1. Overall Legal Requirements

   a. A center is not permitted to revisit an AC’s determination that an applicant meets the EAR and is qualified for Job Corps, even if the center disagrees with the AC’s determination of the applicant’s qualification(s) except in the following limited circumstance.

      1. The center receives new information that:

         (a) was not reasonably available to the AC at the time the applicant’s qualifications were established; and

         (b) indicates that the applicant offered enrollment may no longer meet one of the EAR.

   b. Apart from the circumstance described in a.1 above, the center may review the information in the applicant’s file, such as on the Job Corps Health Questionnaire (ETA 653), the accompanying documentation that is medically related to the information on the questionnaire, or that the applicant has otherwise voluntarily disclosed, to determine the health needs of the applicant and/or to determine whether the applicant has a disability, mental health, or medical condition that likely poses a significant risk of substantial harm to the health or safety of the individual or others.

      Only the categories of persons identified in Appendix 607 may be permitted to review, or have access to the applicant’s medical, health, or disability-related information.

Strategy:

➢ This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA.
### R2. Applicant File Review Process

**a. Responsibilities of Records Staff**

The records department is the gatekeeper of all applicant files. The records department must maintain a single ongoing log which documents:

- the location of every applicant file,
- how long the file has been on center,
- who the file was sent to,
- how long the file has been with a particular department or staff person, and
- the center’s recommendation regarding enrollment and/or an explanation of any final movements or actions taken related to a file (i.e., for example, an applicant contacted center to request a withdrawal of application and file returned to OA since file is not in regional review).

For those files sent to the Regional Office for review, the records department must document the date the file was sent, to whom it was sent, and the final disposition of the record.

**b. Responsibilities of Center File Review Team**

The Health and Wellness Manager (HWM) completes a review of the Job Corps Health Questionnaire (ETA 653) and supporting documentation to determine which center staff is needed to conduct a review of each applicant’s file. These staff comprise the center’s file review team (FRT). The center FRT must include the HWM and the Disability Coordinator (DC) (if a student with a disability) and may include other staff such as the Center Mental Health Consultant, physician, Trainee Employee Assistance Program Specialist, and/or the dentist.

**c. Center Procedure**

Each center is required to have a written procedure describing the center’s process for reviewing applicant files. This procedure should describe in detail how an applicant file is processed, from the time it arrives on center from the OA contractor, until the applicant is accepted into the program and assigned a start
date, or recommended for denial and a final disposition is made by the Regional Office. The applicant’s file must be processed within 30 calendar days from receipt by center. If the center reasonably can substantiate needing the file longer than 30 days to complete the file review process, then an extension request may be submitted to the respective Regional Office.

While each center file review procedure may have unique aspects, all center procedures must incorporate the following requirements:

- Location where files are sent and logged in upon arrival to the center and the method of tracking the movement of the file to include an explanation of the center’s disposition of the file. See 1.4 R2(a).
- Responsibilities and roles of applicant FRT members to include the HWM, the center clinicians, and the center’s DC(s) which usually will include the center’s HWM.
- Procedures for reviewing an applicant file to include the acceptable reasons for recommending denial of an application.
- Procedures for reviewing and determining reasonable accommodation.
- Procedures for processing application withdrawals both before and after submitting a file for regional review.
- Timeframe the center establishes to complete the file review process to ensure it meets the PRH required timeframe of 30 calendar days.
- Storage, transmission and maintenance of the applicant file information (see Appendix 607).

See Appendix 107, “Standard Operating Procedure” for detailed descriptions of the requirements listed above.

Strategy:

- This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA.

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Rationale for Rating:
R3. **Review of Health Information**

a. The HWM conducts the initial review of the health documentation in the individual applicant’s folder, including Job Corps Health Questionnaire (ETA 653) and the medically related supporting documentation that has been submitted with it, to:

1. Explain the health-care needs of the applicant.
2. Determine whether Job Corps can meet the health care needs of the applicant.
3. Determine if the applicant presents a direct threat to self or others.
4. Obtain consent for required routine medical assessments and/or consent to receive basic healthcare services.

b. **Health-Care Needs Assessment**

A health care needs assessment may be conducted for an applicant if the center clinical staff believes that:

1. The health care needs may not be manageable as defined by basic health-care services in Exhibit 6-4; or
2. The health care needs may be manageable but may require community support services which are not available near the center of assignment; the applicant should be assigned to a center where these needs can be met.

In the instance that a center has recommended the applicant’s health-care needs can be met in Job Corps if the individual were located at a center where needed resources and supports were available, the applicant’s file is routed through the typical regional review process with the following additional steps:

(a) If the center’s recommendation is supported by the Regional Health Specialist (RHS) and approved by the Regional Director or his or her designee, then the Regional Office returns the file, including the completed health-care needs assessment from the initial center, to the AC to contact the applicant and assist in identifying the new center.

(b) The new center completes a review of the documentation and confirms the current status of the applicant and then documents the contact and assessment in the progress notes narrative and includes in the medical file.

(c) If the center’s recommendation is to accept the applicant, the center notifies the AC and the Regional Office and schedules the individual for arrival. If the center’s recommendation is to deny the applicant, then the center notifies the AC and forwards the file back to the Regional Office for a second clinical review by the appropriate RHS.
(d) If the RHS recommends overturning the center’s recommendation of denial and the Regional Director, or his or her designee, concurs, then the center is notified that the applicant must be scheduled for enrollment. If the RHS concurs with the center’s recommendation and the Regional Director, or designee concurs, then the applicant is notified of the disposition of his or her file, the file is returned to the AC, and the center notified of the Region’s decision.

See Appendix 610 for specific guidance on conducting a health care needs assessment. See “Review of Applicant’s Health-Care Needs by the Alternate Center” found in Appendix 107 and “Review Process for Recommendations to Attend an Alternate Center” found in Appendix 108, for detailed descriptions of the requirements listed above.

c. Direct Threat Assessment

In the case of an applicant, a direct threat assessment may be conducted:

1. Whenever Job Corps believes that a known or apparent disability or medical condition poses a direct threat to the health or safety of the individual or others. This typically will occur after the applicant has received conditional assignment to a Job Corps center and has completed the Job Corps Health Questionnaire (ETA 653).

2. If the specific information that has been received about that particular applicant indicates that he or she may have a medical condition or disability that:

   (a) Poses a significant risk of substantial harm to the health or safety of the individual or others; and

   (b) Cannot be eliminated or reduced by reasonable accommodation or modification.

If the specific information in the folder appears to meet the standards described above, the HWM will forward the applicant’s information to the licensed health provider employed by the center for a detailed direct threat assessment.

For specific guidance on conducting a direct threat assessment, see Appendix 609.

Strategy:

- This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA.

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R4. New Information Review of Applicant Eligibility

a. The AC determines an applicant’s initial eligibility (i.e. meets the EAR to enroll in the Job Corps program. The files of eligible applicants are forwarded to the center in which the applicant has been conditionally assigned so that the center may complete a clinical review. The center FRT or its individual members only may revisit the determination that an applicant is qualified for admission (i.e. an applicant’s eligibility status) if:

1. There is new information presented that the AC could not have reasonably known at the time the applicant’s qualification for admission was established; and

2. The new information indicates that the applicant offered enrollment may no longer meet an EAR (See Section 1.4, R1 a).

If new information is present that indicates that an applicant may no longer be eligible to enroll in Job Corps, the center FRT must complete the following steps:

1. Identify the specific EAR that the applicant no longer is believed to meet as per the criteria listed in Exhibit 1-1.

2. Re-apply the listed criteria for each of the specific EAR in question. Ask the applicant any questions outlined within the guidance information in Exhibit 1-1 for the specific EAR. The questions must be stated in the same way they are written in Exhibit 1-1 and as they were originally asked by the AC. Their content may not be broadened or modified.

3. If the applicant provides a negative (e.g., “no”) response to the specific questions previously asked by the AC from Exhibit 1-1, then the applicant is no longer eligible and the application process is stopped. If the applicant responds in the affirmative with a “yes” response, then the application process continues.

For example, in Exhibit 1-1 within the guidance for EAR J, Group Participation and Understanding of Rules, the AC was instructed to ask: “Do you understand that you will be living and working with members of various races, ethnic groups, political or religious affiliations or beliefs, sexual orientations, gender identities, and people with disabilities?” The applicant would have responded with a “yes” to have been found eligible previously by the AC. Then the next question asked of the applicant is
“Knowing this about Job Corps, are you willing to go forward with your application?” If there is new information that the AC could not have reasonably known that may now indicate that this applicant is no longer eligible under the “Group Participation” EAR, then the center FRT must ask the exact same questions of the applicant as those originally asked by the AC for that specific EAR.

4. If the applicant is determined to no longer be eligible, then the center completes the Center Recommendation of Denial Form and submits it, the applicant file and the supporting documentation to the Regional Office for review.

b. New Information—Age (EAR A) and Income Eligibility (EAR D)/Disability Status

In general, ACs may not ask whether an applicant is an individual with a disability or about the nature and severity of a disability prior to conditional enrollment in Job Corps. At two points in the process of determining eligibility, however, ACs may invite an applicant to disclose whether he or she has a disability:

1. If the applicant is, or will be, over 24 years old on the date of enrollment, the maximum age limit may be waived if he or she is a person with a disability (EAR A).

2. If the applicant would not meet the low-income requirement unless the applicant is considered a “family of one” because of disability (EAR D).

The AC does not determine whether or not an applicant is a person with a disability. Appropriate center staff will do this since the AC does not review health and medical information. The AC will gather the documentation and place it in a sealed envelope with the applicant file that is then forwarded to the center for review.

- The center reviews the documentation of disability. If the documentation supports that the applicant is a person with a disability, the applicant file review process continues.
- If the center determines that the applicant is not a person with a disability, then the center completes and submits the “Center Recommendation of Denial Form” along with the applicant’s file and submits to the Regional Office for review.

Strategy:

- This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA. Review applicant file review logs, interview FRT members and review center file review standard operating procedure.
R5.  Determination of Ineligibility or Failure to Meet Other Essential Admissions Requirements After Enrollment

If, after an individual is enrolled in Job Corps, new information is received that is credible and reliable and that indicates that the individual does not meet the admissions criteria for the program, appropriate members of the FRT will review the new information and determine, based solely on that information, whether or not the individual remains qualified for the program. If the team determines that the individual has become unqualified and recommends that the individual be removed, the file, the Center Recommendation of Denial Form for New Information (see Appendix 107), and supporting documentation must be sent to the Regional Office for review prior to removing the individual. The individual should remain on center until he or she is officially separated, unless he or she poses a risk to himself/herself or others or would interfere with the delivery of services to other students. See Section 1.5, R1 for information about the Regional Office’s role in the process.

Strategy:

➢ Conduct interviews with the FRT members and ask them to describe the procedures they use when a student has been determined unqualified.
R6. **Pre-departure Center Contact**

Centers will contact assigned students prior to scheduled arrival to welcome them and provide information about the center, reiterating behavioral standards.

**Strategy:**

- Interview management and OA staff to determine their understanding of the pre-departure center contact requirements.
- Review center SOPs and CDSS plan to determine activities related to contacting pending arrivals.
- Discuss pending arrival activities with Career Preparation Period staff and/or records staff. Determine what information is communicated to pending arrivals. Review pre-arrival letter. Does it meet PRH guidelines?

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**Rationale for Rating:**

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R7. **Arrival Scheduling**

Centers must:

a. Accurately project arrival needs and issue arrival requests to the ACs in accordance with Regional Office procedure.

b. Ensure that the application folder is complete and contains all required documentation upon arrival at center. The center will contact the AC to obtain missing or incomplete documentation.

c. Schedule timely assignment, for first available opening on center, of applicants referred by ACs, to ensure maintaining center at capacity.

d. Where reasonable accommodations will be provided, ensure that the accommodations are in place before arrival. However, failure to provide timely accommodations will not excuse undue delay in an applicant’s arrival, and may be the basis for a discrimination complaint.

e. Provide timely travel authorization and arrival information to ACs and other appropriate parties, as required.

f. Meet and greet arrivals at the designated time on the center or at the determined travel termination point.
Strategy:

➢ Are there good communications between center and OA? How does center notify OAs of its needs? How does center notify applicant of arrival date? Is there a minimum two-week waiting period between notification and arrival? Review student arrivals in OASIS to determine if arrival date matches travel date. Review SOP for arriving students on center.


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Rationale for Rating:

QUALITY INDICATORS:

Q1. Center has a written procedure describing the center’s process for reviewing applicant files.

Strategy:

➢ This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA.


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Rationale for Rating:

Q2. Records log data supports that applicant files are processed within 30 days of arrival on center.

Strategy:
This area is assessed by the Job Corps accommodation support contractor using their ROCA tools and rated in the Disability Program section of the ROCA.

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Rationale for Rating:

Q3. Students report that they were contacted by the center prior to scheduled arrival.

Strategy:

- Interview students to determine if they were contacted by the center prior to their arrival.

Q4. Arrival needs of the center are met in accordance with Regional Office GAP which identifies a target for the maximum percentage of students at each center who come from the state or region nearest the center, and the regions surrounding the center, in accordance with 20 C.F.R. 670.450.

Strategy:

- Review GAP.
Q5. Centers are maintained at enrollment capacity.

Strategy:

➢ Review current center OBS.

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Rationale for Rating:

PRH 1.4 - Summary Rating

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1.5 REGIONAL OFFICE ROLE IN THE ADMISSIONS PROCESS

PURPOSE

P1. To establish procedures for conducting an automatic quality review of applicant files in cases where the applicant has been denied admission by an admissions counselor.

P2. To establish procedures for processing applicant recommendations for denial by the Job Corps centers.

P3. To establish procedures for processing appeals from denials issued by the OA agency or the Job Corps center.

P4. To establish procedures for processing appeals which have not been timely decided by the OA agency or Job Corps center.

REQUIREMENTS

R1. Regional Office Process for Review of Applicant Files

Each Regional Office must establish procedures

- To perform quality reviews of applicant files found to be ineligible by the AC
- To review the files of applicants who have been recommended for denial by a center, and
- For the review of appeals filed by applicants who have been determined to not meet the EAR by the OA agency or Job Corps center, and where appeals have not been timely decided by the OA agency or Job Corps center.

The Regional Office designates a Regional Office File Review Coordinator who will record and track the movement of applicant files recommended for denial throughout the regional review process. (See Appendix 108) All applicant folders are logged in as they are received at the Regional Office and the Regional Office File Review Coordinator initiates a Regional Applicant File Review Process Form (see Attachment A, Appendix 108) which is attached to the file to subsequently be completed by each respective reviewer, as indicated on the form.

All applications must be reviewed in a timely manner.

Recommendation of Denial Due to New Information

Applicant files recommended for denial under this category are reviewed and processed internally at the Regional Office except in the instance where the denial is based upon disability status related to age or income. Files requiring a review of disability status are forwarded to the Regional Administrative File Review Coordinator to review and provide a recommendation to the Regional Director, or designee.

Recommendation of Denial Based Upon Health Care Needs, Direct Threat Assessment, or Disability Status

The applicant’s file is forwarded to the designated Regional Administrative File Review Coordinator to complete an administrative review to determine if all required file review
procedures have been completed and if all required process documentation is included within the file. Once the administrative review is complete, the Regional Administrative File Review Coordinator forwards the file to the appropriate RHS for a clinical review, i.e., mental health, medical, dental, or TEAP. The RHS documents his/her findings return the file to the Regional Director, or designee for a final determination.

Applications in which a center has determined that the health care needs could be met if the applicant were to attend a center closer to the needed resources and supports may require a second review by the RHS and the Regional Director, or designee, if the second center also recommends denial of the application. In that instance, the file will be reviewed by the RHS again and a recommendation made to the Regional Director, or designee, for a final determination.

Strategy:

➢ Interview staff members to see if they are aware of Regional Office procedures and if the records applicant file review log reflects appropriate tracking of files that required Regional Review or were submitted for Regional Review (i.e., applicant file returned to OA for a reason outside of policy allowances).

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Rationale for Rating:

R2. Notifications of Application Disposition

If the Regional Director, or his or her designee, upholds the center’s recommendation of denial, the Regional Office notifies both the AC and the center of the final determination and issues a clear, documented, written decision to the applicant. The AC provides the appropriate referral information to the applicant.

Denials based upon New Information (including Disability Status related to age and/or income)

If the Regional Director, or his or her designee, does not uphold the center’s recommendation to deny, the file is returned to the center and the center given the opportunity to determine whether or not they wish to complete a health care needs or direct threat assessment, as appropriate, or to enroll the applicant.

Denials based upon Health Care Needs or Direct Threat

July 28, 2014
If the Regional Director, or his or her designee, does not uphold the center’s recommendation to deny, the file is returned to the center with direction to enroll the applicant.

Strategy:

- Review the center’s records applicant file review log to see if final application dispositions are documented in the log.

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Rationale for Rating:

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**R3. Regional Office Procedures for Assignment of Applicants Determined Qualified Pursuant to its Quality Control Reviews**

Regional Offices must establish procedures for assignment of qualified applicants to centers, including waivers for applicants assigned to centers other than closest to home (see Section 1.2, R15).

Strategy:

- Interview management and OA staff to determine their understanding and use of:
  1. GAP
  2. PRH assignment requirements
  3. Waivers of assignment requirements
  4. OASIS

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Rationale for Rating:
**R4. Appeals**

Regional Offices must identify personnel responsible for the automatic review process and the appeals process. Each of the appeals processes must be managed by separate personnel.

With the Regional Office’s respect to deciding an appeal, the regional office must issue a clear, documented, written decision regarding review of a determination of ineligibility within 60 days of the date on which the appeal is filed.

**Strategy:**

- Interview staff members to see if they are aware of Regional Office procedures.

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**Rationale for Rating:**

**R5. Complaint Process**

If the applicant believes that he or she has been denied admission for enrollment as a result of discrimination on a protected basis (race, color, religion, sex/gender, national origin, age, disability, political affiliation or belief, citizenship, or participation in a program or activity financially assisted under WIA Title I), he or she may file a written complaint within 180 days of the decision, with either the recipient of the funds, as defined in 29 CFR 37.4, such as the OA agency or the Job Corps contractor, or center operator (if not federally operated), or the U.S. Department of Labor Civil Rights Center (DOL-CRC). Provide the applicant with the contact information of both the recipient and the Director of DOL-CRC. DOL-CRC’s information is as follows:

Director, Civil Rights Center  
U.S. Department of Labor  
200 Constitution Avenue, NW  
Room N-4123  
Washington, DC 20210  
(202) 693-6502 (voice)  
TTY: (202) 693-6516  
CivilRightsCenter@dol.gov
For electronic versions of DOL-CRC’s complaint form in English or Spanish (PDF or HTML format), please go to DOL-CRC’s website at: http://www.dol.gov/oasam/programs/crc/.

Strategy:

- Interview staff members to see if they are aware of Regional Office procedures.

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QUALITY INDICATORS

Q1. Each month, a quality review of at least 5 percent of files of applicants denied admission is completed.

Strategy:

- Review Regional Office monthly reports.

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Q2. Applicant appeals are processed and decisions issued by the Regional Office within 60 days.
Strategy:

- Review Regional Office monthly reports.

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Rationale for Rating:

PRH 1.5 - Summary Rating

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1.6 READMISSION

PURPOSE

P1. To establish criteria to verify an individual’s qualifications and to assess his or her appropriateness for re-entry to Job Corps.

REQUIREMENTS

R1. Readmission Criteria

ACs must assess, determine, and verify that applicants for readmission:

a. Meet all Essential Admissions Requirements (see Exhibit 1-1).

b. Have not been readmitted before, unless the most recent separation was the result of a medical separation and the student is able to meet the Essential Admissions Requirements of the program with or without reasonable accommodation.

c. Have no more than 18 months of previous, paid Job Corps training and can be expected to complete training within a period of time which, when added to the initial stay, will total no more than 24 months, unless the period is extended as part of a reasonable accommodation of a disability.

d. Have been out of Job Corps a minimum of 1 year. This may be waived at the discretion of the Regional Director.

e. Have not previously received mandatory separations for Level I disciplinary reasons (refer to Exhibit 3-1, Infraction Levels and Appropriate Center Actions) except for applicants previously separated for Level I drug use (i.e., positive drug test prior to the 45th day after entry, or on second suspicion test). Such applicants are eligible to reapply in 1 year. If such applicants test positive for drug use upon readmission, they will be separated immediately and not allowed to reapply to Job Corps.

Strategy:

➢ Interview management and ACs, and query them on readmission criteria and process. Is there an SOP that accurately describes the process?
Rationale for Rating:

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R2. Application Procedures for Readmission

ACs must:

a. Help the applicant for readmission complete all required application forms.

b. Verify the applicant’s entry and separation dates, previous center of assignment, reason for separation, and center recommendation regarding readmission. Center may recommend that the applicant be readmitted to Job Corps but may recommend that he or she not be readmitted to the previous center he or she attended, in cases where rejoining the original center would decrease the applicant’s likelihood to succeed in the program.

c. Provide justification for readmission that clearly demonstrates a motivational change as well as behavioral improvement by the applicant who previously received an unfavorable center recommendation or a disciplinary discharge. The applicant must provide the AC with documentation of how he or she has made positive improvements since leaving the program, e.g., letter attesting to participation in volunteer activities, certificate of completion of vocational/educational classes. Documentation may be included in the applicant folder.

d. Original centers must provide student files to the receiving center in the case of readmitted students.

Strategy:

➢ Interview management and ACs to determine their understanding of the readmission process.

➢ Review readmission files to ensure compliance with requirements.
Rationale for Rating:

R3. Readmission Denials

ACs must:

a. Refer readmission applicants determined not to meet the EAR to an appropriate One-Stop Center, or other training/educational resource in his or her home community.

b. Keep clear documentation on file about the steps that were taken to inform, counsel, and refer the readmission applicant who was determined not to meet the Essential Admissions Requirements.

Strategy:

- Interview management and staff to determine their understanding of the denial process and notification and referral requirements.

- How are applicants notified? Review the notification letter to ensure it meets PRH requirements. Does it include a list of referrals to other agencies?

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Rationale for Rating:

QUALITY INDICATOR

Q1. Students selected for readmission meet the applicable criteria, and are successful in the program.

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July 28, 2014
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Rationale for Rating:

PRH 1.6 - Summary Rating

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Sample Consolidated Rating Matrix

As noted in the PAG Preamble, Regional Offices have flexibility in weighting the scores of OA, Center, and CTS assessments based on a variety of factors. Since most OA contracts and Center contracts differ in their responsibilities regarding the PRH, different matrices can be developed for OA and Center contracts. Additionally, regions have the flexibility to eliminate factors or add factors to their matrix.

Regional Directors and/or Division Chiefs should develop the matrix prior to the assessment so that the Review Team understands what areas need to be reviewed and how the ratings are to be established.

Below are sample matrixes for use in different contract types.

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<td>1.4 Center Responsibilities in Admissions Process</td>
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The OA matrix above does not provide for any additional emphasis on specific PRH requirements or quality indicators. Regions have the flexibility to add specific requirements or quality indicators that they would like to emphasize as part of the assessment process.
### SAMPLE CENTER CONTRACT MATRIX

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**Average Compliance Rating**

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**Average Quality Rating**

Regional Offices have the flexibility to modify the matrix in order to place special emphasis on particular requirements or quality indicators.
CHAPTER 2:
CAREER PREPARATION PERIOD
June 28, 2013
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<tr>
<td><strong>Exceptional (8/9)</strong></td>
<td>Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.</td>
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<td><strong>Very Good (6/7)</strong></td>
<td>Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.</td>
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<td><strong>Satisfactory (4/5)</strong></td>
<td>Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.</td>
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<td>Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.</td>
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<tr>
<td>** Unsatisfactory (0/1)**</td>
<td>Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.</td>
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Note: A glossary of acronyms is located at the end of the PAG Preamble.
2.0 OBJECTIVES

To ready each student for successful participation in the Job Corps experience by providing a Career Preparation Period designed to assist each student to:

- Acclimate to center life.
- Acquire basic skills that will enhance job readiness and job search competencies.

To enable staff to help each student to acclimate to center life by:

- Identifying and addressing personal issues that are barriers to successful adjustment and participation.
- Tailoring the mix of services to the individual student’s needs.
2.1 CENTER PLAN

PURPOSE

P1. To ensure the efficient, effective, and coordinated delivery of career preparation services to students.

REQUIREMENTS

R1. Center Career Preparation Plan

a. Centers shall prepare and implement a center Career Preparation Plan (CPP), as part of the overall Career Development Services System (CDSS) Plan. The plan shall be submitted for Regional Office approval in accordance with Section 5.1, R3.c, Career Development Services System Plan.

b. Career preparation services reflected in the plan shall be tailored to the individual needs of each student.

c. At a minimum, the CPP Plan shall address:

   1. The rationale for the center’s CPP design and how it will motivate student success and ensure the provision of individualized services to assist each student in preparing for full program participation.

   2. Organization, to include detailed descriptions of:

      (a) How CPP will be staffed to deliver a full array of services to meet each student’s needs.

      (b) How staff will communicate across various departments to deliver the services.

      (c) How staff will coordinate with Outreach and Admissions (OA) staff to ensure that school records are obtained before or during the CPP.

      (d) How services and activities will be scheduled, paced, and delivered to ensure personalized learning opportunities tailored to each student’s needs during the first 60 days of enrollment.

      (e) How student input and feedback will be encouraged and used.

      (f) How the center will create an environment where students regard staff as supportive, caring, and dependable.

   3. Examples of methods and materials to be used to teach each of the required content areas as required in the PRH.

   4. Methods to involve contact between students and employers to establish the relevance of Job Corps career preparation and development activities to the workplace.

   5. The use of practical experiences to enable students to learn and practice skills.

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6. Methods and strategies to create student commitment to and ownership of their career, academic and social/behavioral goals and progress.

7. A system that identifies and addresses students’ personal issues that may prevent them from being fully engaged in the CPP.

8. Approaches to involve Admissions Counselors in the students’ successful adjustment to CPP.

9. Methods to assist students in developing the confidence and motivation to achieve their career goals.

10. Approaches to tailor the CPP to meet the needs of English Language Learner (ELL) students, if applicable.

11. Approaches to evaluate student readiness to participate in career development activities.

12. Methods planned to ensure a smooth transition from career preparation to career development for each student as he or she is ready.

Strategy:

- Interview CPP staff. Do they have a copy of the CPP section of the plan? Are they familiar with the plan? Are they following the plan, or are their methods different?

- Review the regional and center Career Preparation Plans. Verify if the center’s plan is consistent with the regional plan and satisfies PRH requirements.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Center practices are in accordance with the CPP Plan.

Strategy:

- Observe career preparation activities to see if planned activities are taking place. Review Career Preparation Period staffing and scheduling. Are there flexible opportunities for students to participate in those activities identified in their PCDP or do all students
participate in all activities? Are there opportunities for students to participate in individualized projects and activities during evenings and weekends?

- Determine if the center is providing instruction in each of the required content areas. Review Career Preparation Period content; observe activities for hands-on, practical experiences for students.

- How are career preparation services tailored to meet the needs of individual students (i.e., ELL, students with learning and other disabilities/special needs)?

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Rationale for Rating:

PRH 2.1 - Summary Rating

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June 28, 2013
2.2 INTRODUCTION TO CENTER LIFE

PURPOSE

P1. To welcome new students and assist them in acclimating to center life.

P2. To acquaint new students with center systems, behavioral standards, benefits, rules, and procedures to enable them to participate successfully in the program.

REQUIREMENTS

R1. Activities

Centers shall provide new students with an introduction to center life that includes:

a. Activities designed to make them feel welcome and safe upon arrival.

b. Experiences and information that will lead to an understanding of the opportunities and benefits available and the program’s expectations of Job Corps students, to include the following:

1. Job Corps’ mission
2. The Career Development Services System
3. The center’s basic schedule of training and activities
4. The Career Success Standards
5. Assessment testing
6. Evaluation of Student Progress
7. Student rights and responsibilities
   (a) Behavioral standards and expectations
   (b) Equal opportunity, civil/legal rights, religious rights, sexual harassment, and anti-bullying policies
8. Student government and leadership programs
9. Student benefits
   (a) Pay and allotments
   (b) Accountability, leave and absence policies
   (c) Support services (e.g., food services, mail, telephone, and voting rights)
10. Center and community life
    (a) Dormitory life
    (b) Hands-on activities to practice the Career Success Standards
    (c) Recreation/leisure time activities
    (d) Information about the local community
11. Health and Wellness services, including:
12. Safety as it pertains to eliminating or preventing hazards that may result in injury, illness, or death. Topics should include but are not limited to:

(a) Overview of the Job Corps Occupational Safety and Health (OSH) program outlined in PRH Chapter 5, Sections 5.14 through 5.20 (emphasize student roles and responsibilities), including but not limited to:

(1) Occupational Safety and Health Committee
(2) Fire Safety and Prevention
(3) Emergency Action Plan (including extreme/severe weather, evacuations, and terrorist threats)
(4) Hazard Communication, including Material Safety Data Sheets (MSDSs) and labeling
(5) Applicable Occupational Safety and Health Administration (OSHA) standards (varies by work or training environment)
(6) Safe work practices, including use of personal protective equipment (PPE)
(7) Reporting unsafe or unhealthful living and training conditions
(8) Recreational safety, including water safety

(b) Reporting accidents, injuries, and illnesses (emphasize timely reporting); OSHA 300 Log and OSHA 300A

(c) Work-based learning site safety, including reporting unsafe and unhealthful conditions, and accident and injury reporting requirements

(d) Preventing the spread of flu and other illnesses; personal hygiene

(e) Safety recognition program

13. Security as it pertains to center culture, personal comfort, and well-being. Topics should include but are not limited to:

(a) Center security procedures

(b) Unauthorized goods and confiscation procedures

(c) Zero Tolerance policy

(d) Smoking policies on and off center

(e) Off-limit areas on and off center
(f) Theft protection and tort claims
(g) Student vehicle policy
(h) Security operations
(i) Sign-in and sign-out procedures (passes and leave); entry and exit procedures
(j) Inventory of personal belongings
(k) Identification cards
(l) Phone calls
(m) Mail procedures
(n) Visiting procedures

c. An introduction to acquaint new students with the diversity represented on the center and in the community, and to familiarize them with the Multicultural Awareness Standard.

d. A variety of opportunities for new students to meet and interact with:
   1. Center Managers
   2. Career Development/Transition Managers and/or Specialists
   3. Counselors
   4. Disability Coordinator
   5. Staff representatives from all major program and support areas
   6. Student leaders

Strategy:

➤ Review CPP schedule. Are required activities included in the schedule? Interview the person(s) responsible for instruction and get a copy of the curriculum/schedule.

➤ Observe if written information is given to students during scheduled lectures/meeting in order to follow along and make notes, and request copies of the materials. If possible, sit in on classes to see how materials are presented. Are there evaluations of student knowledge? How is student progress monitored?

➤ Determine when and how employment and employability is introduced.

➤ Determine what opportunities are available for new students to meet with CDSS Specialists, counselors, and other staff. Determine what role student leaders play in new student orientation.
Interview staff. Do management and staff understand the CPP process? Can they describe the activities/content areas that students participate in? Can they describe the transition from CPP to CDP?

Interview students. Do students understand the difference between safety and security?

Do students understand their roles and responsibilities in the center’s Occupational Safety and Health program?

Are students familiar with the terms Occupational Safety and Health Administration (OSHA), OSHA 300 Log, and OSHA 300A

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Rationale for Rating:

R2. **Student Handbook**

Centers shall develop and distribute to all students a Student Handbook that accurately reflects current center behavioral expectations, benefits, policies, and procedures in the areas included in Section 2.2, R1.b, at a minimum.

Strategy:

- Request a copy of the new Student Handbook and review for relevancy and accuracy (e.g., compare with CDSS Plan and SOPs). Does the handbook reflect current center benefits, policies, procedures, and behavioral expectations including the Career Success Standards? Discuss with management any discrepancies between the handbook and current policy.
- Does the handbook include guidance on occupational safety and health?
- Does the handbook include emergency evacuation procedures in the event of fire, flooding, or other emergency?
- Does the handbook address reporting unsafe or unhealthful living and working conditions on center?
- Does the handbook address reporting accidents, injuries, or illnesses that occur on center?
Does the handbook address reporting unsafe or unhealthful working conditions on work-based learning sites?

Does the handbook address reporting accidents, injuries, or illnesses that occur on work-based learning sites?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Students report feeling welcome upon arrival.

Strategy:

- Interview students and staff. Do students feel safe and relaxed? Is there evidence of cooperation between students already on center and new students? Between new students and staff? Among the staff responsible for career preparation? Between the OA staff and center staff?

- Observe the arrival process. Are there systems in place to welcome students? Are the systems organized? In what ways do they promote a calm and respectful, yet happy and exciting environment? How is the schedule adapted to students arriving at different times? Are there opportunities for new students to meet other students in a fun, nonthreatening way? How are a student’s belongings inventoried? Is it done in a respectful, private manner?

- Observe how students are introduced to their room. Is the room inviting and welcoming. (e.g., is there a clean wardrobe? Are there hangers? Does the bed have clean sheets? Is there a place to store toiletries and is it adequate?)?

- Observe the initial CPP activities and events. What information is shared? Are presentations clear, interesting, and fun? Are various instructional strategies used to accommodate varying learning styles? Do they promote student participation through questions and discussions? Do presenters emphasize employment and Career Success Standards? Do they motivate students to become engaged in their own Career Development Plan?
Q2. Students can describe center expectations, systems, behavioral standards, benefits, and services available to them through Job Corps.

Strategy:

➢ Conduct individual interviews and/or a focus group(s) with students. Considering their length of stay at the center, determine their level of knowledge about center expectations, systems, behavioral standards (including the Career Success Standards), benefits, and services. Do students understand their roles and responsibilities in relation to the center’s expectations and the CDSS model? Do they know how to use center systems? Are their expectations of Job Corps realistic? Do they have a Student Handbook? Do they find it helpful?

➢ Students should be able to articulate their knowledge of the Career Success Standards. This explanation should include concrete examples of their work to achieve a “meets standard” or “excels” level for each standard, including individualized projects and activities.

➢ Review center materials (e.g., Student Handbook) used to acquaint students with the center CDSS and CSS. Are the materials complete? Is the content accurate? Is it appealing? Is the language clear and easy to understand? Is it positive, respectful, and fun?

➢ Determine how students are assigned to their counselors and CDSS Case Managers? Are the processes for assigning students used? Are assignments clear to students?

Q3. Students are acquainted with staff and know who to ask for assistance with their needs.
Strategy:

- Conduct interviews or focus groups to learn if the students are able and willing to seek assistance from the appropriate staff member or department. This could be tested in a fun way (e.g., create games that require students to match staff names with their specific responsibilities or with the types of problems for which students should consult them).

- Can students identify their counselor? CPP instructors/staff? Residential Advisors?

- Review or observe other means of communication used on center (e.g., bulletin boards, newsletters, staff identification badges, etc.). Find out if staff and student leaders, as well as their areas of responsibility, are clearly identified for other staff and students to view. The larger the center, the more rigorous the testing should be in this area since it can be more difficult for students to identify and access resources in larger centers.

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Rationale for Rating:

Q4. Students’ needs for assistance with personal issues are appropriately identified and addressed.

Strategy:

- Determine if an initial intake interview is conducted within the first 48 hours. Are students’ needs for assistance identified and addressed?

- Review Case Notes. Is there evidence of a team approach to addressing students’ needs? For example, are there referrals, memos, and e-mails among staff to address and follow up on identified needs?

- Interview staff to find out what systems are in place to identify and meet students’ needs. Find out how staff are using these systems. Find out if they are collecting information about causes for early separation during the CPP. Are they noting trends? What are they doing with this information?

- Review the center’s Weekly Termination Rate (WTR). Are there trends?

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### Rationale for Rating:

#### Q5. Students are familiar with the center’s Occupational Safety and Health program.

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2.3 STUDENT ASSESSMENT

PURPOSE

P1. To assess student’s prior academic achievement, skill level needs, and interests so that appropriate individualized career development services may be provided.

P2. To identify student’s personal issues so that appropriate support can be provided early in enrollment.

REQUIREMENTS

R1. Assessing Student Needs and Interests

Using formal and informal methods, centers shall assess each student’s needs and interests to include:

a. Level of academic achievement, competency for appropriate placement in academic classes, using the high school transcript, IEP (if applicable and available), and the Tests of Adult Basic Education (TABE) in accordance with procedures in Appendix 301 (TABE Requirements and Instructions for TABE 9/10).

b. Medical status (entrance physical and dental examinations) per Section 6.10 (Student Health Services).

c. Counseling intake needs/interests assessment – Using the student’s application and Admission Counselor’s Assessment Tool (ACAT) as foundations, counselors shall identify at a minimum:

1. Personal history
2. Personal and career aspirations
3. Family status, living situation, and responsibilities
4. Legal issues
5. Personal issues
6. Post-center plans

d. Career aptitude and interests using a formal assessment tool

f. Knowledge of and ability to demonstrate the appropriate behaviors associated with the Career Success Standards.

f. English language proficiency

Centers must administer an initial formal language assessment (CASAS, TABE CLAS-E, BEST) to LEP students within the first 14 days of enrollment. Students who test at the “Beginning ESL Literacy Level” as specified in the “National Reporting System for Adult Education: Test Benchmarks for Educational Functioning Levels” (see Appendix 201) may take their first TABE test within the first 90 days of enrollment. Those LEP students who score above the “Beginning
ESL Literacy Level” must take their first TABE within 21 days of enrollment. After the initial language assessment, all LEP students should take follow-up language assessments at least every 90 days. If a student reaches the “Advanced ESL Literacy Level,” the center is no longer required to administer a language assessment for that student. The results of each language assessment must be documented in CIS and used with other assessments to place the student in to appropriate ESL classes, determine language skill progress and determine readiness to end ESL instruction. In addition, LEP students may take the paper-based TABE test if they are unable to take the online version. Centers must follow the procedures for paper-based testing in accordance with Chapter 3, Appendix 301 (TABE Requirements and Instructions).

- Basic information technology skills
- Transitional needs

Strategy:

- Review CPP schedule. Are assessments scheduled within appropriate time frames? Review counseling files and Case Notes to determine if the required initial intake is conducted and who is responsible. Does the initial intake assessment accurately portray student’s needs? Review how students are assessed on the Career Success Standards. Are both formal and informal assessments conducted to assess a student’s knowledge of and ability to demonstrate the Career Success Standards?

- Review CIS Case Notes and individual Evaluation of Student Progress. Are the results of assessments documented and shared with the appropriate staff? Are the results shared with the student? Review a random selection of Evaluations of Student Progress. Are the results documented on the student’s Evaluation of Student Progress? Does the Evaluation of Student Progress indicate an individualized action plan to help the student meet his or her career training goals and all eight Career Success Standards via appropriate projects and activities?

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Rationale for Rating:

June 28, 2013
R2. Using Student Assessments

Results of student assessments shall be used in collaboration with the student to:

a. Modify long-term goals established during the Admissions Process, establish short-term goals and populate the Evaluation of Student Progress.
b. Schedule appropriate career development classes and activities.
c. Develop essential support systems to address each student’s personal and transitional needs.

Strategy:

➢ Interview counselors. Do they understand the use of the Evaluation of Student Progress as a career development tool? Check their understanding of the system by having them demonstrate entering information from a couple of student files into CIS.
QUALITY INDICATOR(S)

Q1. Students’ initial aptitudes, interests, development needs, and transitional needs are recorded on the Evaluation of Student Progress and used as a basis for career and personal planning.

Strategy:

- Determine whether the Admissions Counselors’ Assessment Tool is in CIS. Who made the last entry into the student’s Evaluation of Student Progress (ESP) and when? Review ESPs to verify if content has been customized to each student. Is there a standard operating procedure that outlines how scheduling is completed? Does it provide flexibility in scheduling academic and career technical training based on individual student need? Is there a schedule of Career Success Standards projects and activities? Does it provide after-hours and weekend opportunities?

- Review the student’s post-center plans. Do the plans identify issues and possible solutions? Review timelines for addressing these issues.

- Look for evidence of communication among academic instructors, career technical instructors, Residential Advisors, counselors, and other center staff regarding specific student issues and challenges so there is an integrated effort to support students in all aspects of center life. Look for evidence that students are aware of this communication mechanism and how to participate in it.
Q2. Students know and understand their needs and can articulate what steps they need to take to achieve their goals.

Strategy:

Interview students. Can they articulate their short- and long-term career, academic and social/behavioral goals? Can they explain the steps they must take to achieve their training and career goals?

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June 28, 2013
2.4 PERSONAL COUNSELING

PURPOSE

P1. To provide initial intervention to address the personal and social development needs of individual students.

P2. To identify and coordinate the delivery of center and community resources to meet the needs identified.

REQUIREMENTS

R1. Organization

Centers shall provide personal counseling services with the following features:

a. Designated counseling staff or qualified professionals
b. Assigned caseloads
c. Personal counseling sessions
d. Availability of counseling services on weekends and in the event of emergencies.

Strategy:

- Interview Counseling Manager.
- How is counseling organized on the center? Are there separate counselors for each phase of CDSS? What is the counseling schedule? Are counselors available on the weekends? Are counselors available after the training day?
- What is the caseload for each counselor? Are cases evenly distributed? Use CIS to pull reports active lists by counselor.
- Observe the counseling office. Do students need to make appointments? Are the hours flexible enough to meet the needs of all the students? How do counselors and staff in the office respond to students’ needs?

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Rationale for Rating:
R2. Personal Counseling Services

Centers shall provide intensive ongoing personal counseling services early within the first 60 days of the student’s stay on center. These services will continue as needed (see PRH 3.3, Personal and Career Counseling) throughout the student’s enrollment, with the following features:

a. An intake assessment, including student history, during the first 48 hours of enrollment (see Section 2.3, Student Assessment). A copy of this assessment will be submitted to the Health and Wellness Center for review and inclusion in the student health record.

b. Ongoing structured, scheduled, and documented individual social development and adjustment counseling.

c. Group support sessions designed to identify and address specific issues, such as abuse, relationships, child care, homesickness, and language and cultural barriers.

d. Identification of students who need more intensive services and referral to such services.

e. Intervention, implementation, and documentation of strategies to address personal issues, including mental health, medical issues, and English Language Learners.

f. Support services, to include assisting with AWOL retrieval; conferring with parents, Admissions Counselors, Career Transition Specialists, and social service agencies; and providing referrals to community resources, as appropriate.

Strategy:

- Interview individual counselors. What is their counseling background? What types of sessions are conducted (individual, group, etc.) and when.

- How do they document the counseling sessions. What do they do with information gathered in the counseling session? Is a plan developed to address individual needs? Review a sampling of their files.

- If acceptable to the staff and student, observe a counseling session. How are questions asked? Are the questions sensitive? Does the counselor establish a rapport with the student? Does the approach used encourage students to open up? Look at the timing of questions. Is the student in the right frame of mind to deal with the questions being asked (e.g., new arrivals may be too anxious to immediately deal with intense personal issues)?

June 28, 2013
Rationale for Rating:

R3. Coordination of Services

Centers shall:

Develop a system for counselors to interact and share information with other staff, departments, and community resources in accordance with R4.b, as needed, to ensure the coordinated delivery of services to students.

Strategy:

➢ Interview counselors. Are there opportunities for them to interact with other staff about individual students (e.g., case meetings, panels, etc.)?

➢ Look for evidence that a case management approach is used to address student problems. Are the efforts integrated? Is there documentation of the problem, a plan of action to address it, implementation, and follow up? Is there evidence outside of the counseling file that the plan of action is being implemented? Are there systems in place to check progress? Is there systematic feedback to appropriate personnel? Is student confidentiality protected (i.e., information is shared on a need-to-know basis)?
**R4. Reporting/Documentation/Recordkeeping**

Centers shall:

a. Ensure that counselors maintain a record of individual counseling sessions to include, at a minimum, the following information:
   1. The reason for such session
   2. An assessment
   3. A plan of action with appropriate follow-up

b. Implement safeguards to assure that personal information about individual students, subject to the Privacy Act, is shared among staff only to the extent necessary to ensure the safety and effective provision of services to students, and no further, in accordance with Appendix 601 (Student Rights to Privacy and Disclosure of Information). Personal counseling records shall be treated as confidential documents.

c. Advise students regarding counselors’ responsibilities for safeguarding confidentiality and for disclosing information that is legally required or that may represent a threat to the student or others.

**Strategy:**

- Interview management and counseling staff to determine if staff understand and follow center plans. Find out where the student files are kept and how easily accessible they are. Are they maintained in a secure area?

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**Rationale for Rating:**

**QUALITY INDICATOR(S)**

Q1. Counseling services are effectively integrated and coordinated with other career preparation activities.

**Strategy:**

- Determine how counselors are participating in CPP. Is there evidence of early intervention during CPP?
Interview staff from other departments. Are counselors viewed as a resource? In what ways do they assist other staff in addressing student behaviors and personal issues?

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Rationale for Rating:

Q2. Students view counselors as a resource to help them address their personal and social development needs.

Strategy:

- Review the student survey. If the rating is low for counseling, verify what the center’s plan is and follow up. Conduct interviews with students or focus groups to get student views on what has worked for them with counseling staff and what can be done to improve services.

- Ask students if they know who their counselor is and how often they see her or him. Review counseling records. Do they indicate a reason for each session, an assessment, and a plan of action with appropriate follow-up? Select several files and determine if follow-up plans were implemented. Were they effective? If not, were adjustments made to the plan? Were students involved in making the plan?

- Review counseling records for confidentiality issues. Is information shared only on a need-to-know basis? How is information shared? Are there formal processes that limit information sharing? How do counselors determine “need-to-know”?

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Rationale for Rating:

June 28, 2013
Q3. Students’ personal and social development needs are met so that they can continue to prepare for careers.

Strategy:

Do counselor notes reflect information about the student’s personal and social development needs? Are these needs identified in their short- and long-term career, academic and social/behavioral goals.

- Evaluation of Student Progress? Are students provided group counseling or other counseling opportunities to address these issues? Are barriers and strategies to overcome these issues identified? Are family issues identified and is there a plan in place that will help students maintain focus on them, such as identifying resources in their own community to deal with family issues?

- Determine how counselors share information with other staff, especially the Center Mental Health Consultant. Are linkages with community resources available? Are there cooperative agreements with those resources and are students provided assistance in accessing them?

- Review counseling files. Are students referred to the CMHC when needed? Are counselors doing follow-up once a referral is made? Do counselors receive feedback/information from the CMHC? Is there any documentation of the coordination between counseling and the CMHC? (Coordinate with assessor reviewing Health and Wellness.)

- Interview career technical and academic instructors. What strategies do they use with students with learning disabilities? Observe counselors in group situations. Do all students participate? Is the session meaningful? Interview student participants for their assessment of group counseling sessions.

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2.5 STUDENT CAREER PLANNING

PURPOSE

P1. To provide students with relevant information and experiences in high-demand and high-growth career technical areas that offer opportunities for job placement.

P2. To assist students in setting short- and long-range goals that will lead to viable career paths and/or postsecondary education.

P3. To assist students in choosing academic pathways and career technical training programs suited to the labor market, as well as to the student’s interests, capabilities, and career goals.

REQUIREMENTS

R1. Career Exploration

Centers shall provide all new students with:

a. A variety of career exploration activities designed to provide information and practical experiences that assist students in understanding various factors to consider when making a career choice and setting career goals, including:

1. Using labor market information to identify and assess career opportunities
2. Recognizing the relationship of goal setting to career planning
3. Understanding the importance of education and training to career success
4. Applying employability and information technology skills to be successful in the workplace
5. Assessing personal interests, aptitudes, and values to assist in making a career choice

b. An overview of center career technical offerings in each area in which the student expresses an interest. This overview shall include information on the following subjects:

1. Wages
2. Working conditions, including physical requirements
3. Required technical training and academic skills
4. Advancement potential
5. Related career technical offerings, postsecondary training, and related careers in the industry
6. Industry-recognized certifications
7. Employment outlook, labor market information, and available placement services offered in the geographical areas to which the student is likely to return

June 28, 2013
8. Practice of general safety
9. Use of hand tools
10. Equipment safety
c. Work-based learning experiences (see Appendix 308) such as:
   1. Structured hands-on experience for each career technical area in which the
      student expresses an interest. No hands-on experience with power tools or
      moving equipment shall be allowed except under the direct supervision of
      the instructor.
   2. Workplace tours, employer presentations, and job shadowing to help
      students refine their career objectives and focus on a specific career
      technical area
d. Goal-setting activities and career counseling to assist students in making informed
   choices on career technical areas to consider.
e. A visit to the nearest One-Stop Career Center to acquaint students with career
   exploration, training, job placement, and other services and resources available to
   them. If a One-Stop is not available in the vicinity, centers shall provide
   opportunities for students to access a virtual One-Stop via the Internet.

Strategy:

- Interview management, academic instructors and CTT instructors to determine that all
  understand the career exploration process. Review CPP schedule to see when Career
  Exploration occurs in the schedule. What activities are scheduled that enable students to
  make informed decisions on trade selection (e.g., reviewing LMI, assessments, job
  shadowing, visits to trade shops, to include hands-on activities)? How are they introduced to
  the One-Stop system?

- Review the Career Exploration Program (CEP) curriculum and materials. Does the center’s
  CEP meet all requirements in an effective manner? How are student Career Technical
  Training choices processed? (If there is an SOP available, determine if the process occurs as
  defined in the SOP.)

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Rationale for Rating:

June 28, 2013
R2. **Evaluation of Student Progress**

a. Centers shall use the student’s information and long- and short-term goals documented in OASIS to populate the Evaluation of Student Progress within the first 30 days when a student arrives on center.

All fields indicated on the Evaluation of Student Progress shall be completed with the assistance of the student. They include:

1. Student long- and short-term goals in the following three areas: career; academics; and social/behavioral.
2. Strengths and Barriers
3. Initial Career Success Standards assessment
4. Desired geographic residence/work location
5. Student entry status regarding:
   - Pre-enrollment educational attainment/credentials
   - TABE results
   - Information technology skills assessment results
   - Previous employment/skills
   - English language proficiency
   - Driver’s license
4. Student interests, aptitudes, and career technical preferences and choices
7. Previous accomplishments/achievements
8. Career transition needs/challenges/strategies
   - Housing
   - Transportation
   - Child care
   - Health care
   - Work clothing and tools
   - Food and nutrition
   - Budgeting/money management
   - Counseling/mentoring
   - Job retention skills
   - Legal services

b. Within the first 2 weeks on center, students shall complete a Student Self-Evaluation accessed through the Student Portal. The Self-Evaluation will ask
students to identify their long-term and short-term goals for career, academics and social/behavioral; conduct a personal assessment of the Career Success Standards; and identify strengths and barriers. The Student Self-Evaluation will be reviewed with the student by the Career Management Team.

c. During the Career Preparation Period, staff will assist students in updating long-term career, academic and social/behavioral goals originally identified in OASIS and developing personalized strategies to reach those goals through:
   1. An individualized schedule of appropriate academic and career technical training.
   2. Exposure, practice, and experiences to meet the Career Success Standards.
   3. Personal and career counseling to develop appropriate strategies and identify resources to address issues.

d. Students’ Evaluation of Student Progress shall be updated, at a minimum, at each Evaluation of Student Progress, in cooperation with appropriate staff. The Evaluation of Student Progress may be updated as frequently as weekly (every 7 days) to closely monitor and track student progress.

e. The Evaluation of Student Progress shall be updated and maintained using the Job Corps automated system. Students shall have access to the Evaluation of Student Progress via the Student Portal.

Strategy:

➢ Pre-assessment, print out an active student roster and randomly select at least 10 percent of the student population. Conduct a review of the Evaluation of Student Progress to see if counselors are using this to develop an individualized goals for students. Do staff members and students understand the process for ESPs?

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Rationale for Rating:

R3. **Assignment to a Vocational Training Program**

Centers shall:

a. Schedule students to their first choice of Career Technical Training program, if feasible, when they are determined to be ready for the Career Development Period.
(CDP), but no later than 60 days following center enrollment. Students with little or no English language skills, who test at the “Beginning ESL Literacy Level” as specified in the National Reporting System for Adult Education (U.S. Department of Education): Test Benchmarks for Educational Functioning Levels shall select a Career Technical Training (CTT) program within the first 90 days on center.

b. When the student’s first choice is not available, the student shall be assigned to a Career Technical Training program that is directly related to his or her first choice, or to his or her second choice.

c. Maintain a log of all students not assigned to Career Technical Training programs within 60 days of enrollment. The list shall show the students’ names, dates of arrival, dates of assignment to Career Technical Training programs, and reasons for delay.

Strategy:

- Pre-assessment: Pull a Career Technical Training Progress Report and download into an Excel file. Sort the file by Career Technical Training program and further sort the unassigned by arrival date to determine those students not assigned to a career technical program within 60 days of enrollment. Determine if any unassigned students are designated as Limited English Proficient (LEP) and, if yes, if those students have been assigned within the first 90 days of enrollment.

- Interview CPP staff (or other appropriate staff). How are students assigned into their career technical trade of choice? Is there a process in place for accommodating students who may not get first choice (e.g., waiting list)?

- Review waiting lists for trades. Review progress of students in those vocations. Are all contracted career technical slots filled?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Students can explain the relationship between their Academic and Career Technical Training assignments, and their career plans.

Strategy:

June 28, 2013
Based on the review of sample ESPs, do assigned Career Technical Training programs fit with their career plan and aspirations? Are plans individualized based on student progress, ongoing evaluation, and Career Technical Training choice? Are plans updated regularly? Are students involved in updating their plans? How?

Review job shadowing and work-based learning assignments to ensure there is a relationship between these experiences and student career plans.

Review the content of the Evaluation of Student Progress. Does it include the elements required in PRH Section 2.5?

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Rationale for Rating:

Q2. Students can articulate their short- and long-term training and career goals.

Strategy:

- Interview students and ask them to explain their long-term and short-term goals for career, academics and social/behavioral goals. Is the goal section of the ESP reviewed and updated on a regular basis to incorporate changes? Do students understand their short- and long-term goals? Where are they now? What are they doing that will help them achieve their short-term goals? How will these short-term goals move them toward their long-term goals and career aspirations? Do they understand how to plan for their long-term training?

- Ask CPP staff how they assist in developing s. Are they involved early in the process or just before student transition?

- Review student schedules. Do they reflect individualized ESPs?

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June 28, 2013
Q3. Students can explain how Job Corps services will assist them with the attainment of their career, academic and social/behavioral goals.

Strategy:

➢ Interview students and/or conduct focus groups with students at different lengths of stay. Can they explain and describe the components of CDSS? Do they understand and can they explain the various services that are provided in each phase and how CDSS applies to their training?

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2.6 NAVIGATING THE LABOR MARKET

PURPOSE

P1. To provide new students with an introduction to fundamental job search and information technology skills needed to successfully navigate the labor market.

REQUIREMENTS

R1. Introduction to Information Technology

Centers shall provide each new student with instruction in the following within the first 60 days of enrollment:

a. The role and impact of technology trends on business and society
b. Basic care and handling of computer hardware and software
c. Basic hardware and software components
d. Basic computer functions
   1. Keyboarding
   2. Word processing applications
   3. E-mail
e. Use of the Internet to:
   1. Conduct a job search
   2. Access labor market information for career exploration
   3. Identify community support service resources
   4. Access One-stop services
f. Appropriate use of the Internet and e-mail

Strategy:

➢ Review CDSS plan to determine how new students are provided with an introduction to fundamental job search and information technology skills needed to successfully navigate the labor market.

➢ Review center efforts to teach students basic technology skills during the first 60 days. Are computers available in both formal classroom settings and after the training day? Are all students scheduled for the same technology training, or are those who are somewhat knowledgeable placed in more advanced training?

➢ How are students being credited with attainment of skills? How is student progress evaluated?


R2. **Job Search Skills**

Centers shall provide each new student with an introduction to basic job search skills, within the first 60 days of enrollment. The introduction shall include at a minimum:

a. Identifying personal skills and attributes
b. Sources of employment
c. Inquiring about a job over the telephone
d. Completing a job application
e. Writing a resume
f. Writing a cover letter
g. Job survival skills
h. Interviewing for a job
i. Information on the apprenticeship application process
j. Worker’s rights and responsibilities (e.g., including reasonable accommodation in the workplace)
k. Strategies for succeeding during the first weeks on the job
l. Availability of Career Transition Services through Job Corps and One-Stops

Strategy:

- Review the CPP plan and related SOPs. How does the center ensure all new students receive the required job search skills? Does the curriculum include all required elements? How is student progress evaluated? How are students being credited with attainment of requisite skills?

June 28, 2013
QUALITY INDICATOR(S)

Q1. Students can describe how to conduct a job search.

Strategy:

➢ Interview students to find out what they know about the labor market and how it applies to them. Ask them to describe the job they want. Do they know other related jobs? Do they understand the diverse opportunities within and across industries and areas? How does what they know apply to their long-term relocation program? Ask them to tell you what they would do if they were looking for a job right now.

➢ Ask students to show you their resumes. Are they professional? Free of spelling and grammatical errors?

➢ Ask students to describe their understanding of Career Transition Services. Have they received career counseling services in their initial days at the center? Have they received help from Job Corps staff in identifying their career transition needs as a part of establishing their ESP?

Q2. Students know what placement and Career Transition Services are provided by Job Corps and One-Stop centers.
Strategy:

- Determine the center’s relationship with the local One-Stop center and local youth development organizations. Are students familiar with the One-Stop system?

- How does the center (CPP program) ensure that students are getting the information they need for career transition. If they left the next day, would they know whom to contact? Ask students to describe the Career Transition Services they would be entitled to at that point. Would they know how to use these services? Do they know the location of the One-Stop center they would use?

- Determine if all students have visited the local One-Stop center.

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Rationale for Rating:

Q3. Students can demonstrate basic skills with personal computers.

Strategies:

- Observe students using computers. What is their general comfort level? Can they navigate using Windows? Can they navigate the Web? Can they find sites? Can they use search engines effectively? Can they use America’s Job Bank or other job search sites? How well do they use basic applications such as word processing, spreadsheet, and e-mail? Ask them if they have access to computers after scheduled classes.

- Interview students. What projects have they completed using technology? How often is technology a part of classroom instruction? What examples of classroom work produced using technology can they share?

- Can students explain how they will use technology to find employment? Ask for a demonstration of their knowledge in accessing labor market information on the Internet. Can students show you job sites on the Internet related to their vocations? Related to their career goals?

June 28, 2013
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June 28, 2013
2.7  CAREER SUCCESS STANDARDS

PURPOSE

P1. To provide new students with an overview and introduction to center expectations, behavioral standards, and the Career Success Standards they will be expected to meet during enrollment in order to successfully participate in the program and become employable.

REQUIREMENTS

R1. Overview

Centers shall provide each student with an introduction to all eight Career Success Standards and an overview of the behavioral expectations of the center. The center will review with each new student the Career Success Standards they will be expected to meet during enrollment in order to successfully participate in the program and become employable.

Strategy:

- Observe the initial CPP phases. How is the introduction to the Career Success Standards given to students? Are presentations clear, interesting, and fun? Do they promote active student participation through questions and discussions? Do presenters emphasize employment and employability? Are students made aware of the projects and activities on center designed to help them meet the Standards? Are they encouraged to participate in these activities? Do they know how they will be evaluated (both formally and informally) on their behavior during their stay on center? Do they understand the function of CSS on center?

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Rationale for Rating:

R2. Individualized Opportunities, Projects, and Activities

Centers shall use the results of formal and informal assessments of the Career Success Standards conducted in the Career Preparation Period (CPP) to provide each new student with a personal and individualized plan for meeting all eight Standards. The individualized plan shall be recorded and tracked in CIS casenotes and should include;
a. An overview of the Standards the student does and does not meet
b. Specific opportunities, projects, and activities on center the student may participate in to meet the Standards and how the student will be evaluated on his or her participation in these activities
c. Expectations for students to acquire and demonstrate the Career Success Standards in all phases of career development and career transition

Strategy:

➢ Interview individual students or hold focus group(s) with students. Do they have a clear understanding of the center’s behavioral expectations? Do they know the Career Success Standards they personally need to improve? Are they aware of their individualized plan for meeting the Standards?

➢ Review a sample of student ESPs. Are plans individualized based on the Standards the student does not meet, student progress, and ongoing evaluations? Are goals updated regularly? Are students involved in updating their goals? How?

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Rationale for Rating:

R3. **Customer Service Training**

Centers shall conduct customer service skills training within the context of Career Success Standards in the areas of Workplace Relationships and Ethics, Communications, and Interpersonal Skills. At a minimum the training must include:

a. Understanding the importance of customer service
b. Maintaining a professional attitude
c. Effective oral and written communication skills, including active listening to customers
d. Knowledge of business ethics
e. Understanding the value of establishing and maintaining positive customer relationships
f. Applying critical thinking skills to appropriately handle customer service situations.

June 28, 2013
Strategy:

- Observe the initial CPP phases. Is customer service skills training given to students as a part of Career Success Standards introduction? Does it cover all of the six areas above?
- Are students made aware of the projects and activities on center designed to help them practice customer service skills?

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Rationale for Rating:

**R4. Evaluation of Student Progress**

Centers shall inform all new students that they will be formally evaluated at least every 60 days on their knowledge of and ability to demonstrate all eight Career Success Standards. This evaluation will be conducted by the student’s Career Management Team and documented on his or her Evaluation of Student Progress.

Strategy:

- Observe a CPP session. Does the instructor discuss the Evaluation of Student Progress (ESP) and its importance? Do students and staff understand the ESP process?
- How are ESPs handled/conducted during CPP? Which CPP staff completes evaluations of students? When and how are these evaluations processed?

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Rationale for Rating:

June 28, 2013
QUALITY INDICATOR(S)

Q1. Students have knowledge of all eight Career Success Standards, including customer service skills, and understand how they will be evaluated on meeting these Standards throughout enrollment in the program.

Strategy:

- Interview individual students or hold focus group(s) with students. Do they have a clear understanding of the Career Success Standards, including customer service skills? Can they explain the Standards (not solely list them)? Can they explain the ESP process?

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Rationale for Rating:

Q2. Students can identify their individualized plan to develop and demonstrate competency in the Career Success Standards.

Strategy:

- Interview individual students or hold focus group(s) with students. Do they have a clear understanding of the center’s behavioral expectations? Do they know the Career Success Standards they personally need to improve? Are they aware of their individualized plan for meeting the Standards?

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Rationale for Rating:

June 28, 2013
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June 28, 2013
2.8 PERSONAL DEVELOPMENT SKILLS

PURPOSE

P1. To teach new students the basic conflict resolution skills needed to participate in the program.

P2. To facilitate students’ employment readiness by providing driver education training.

REQUIREMENTS

R1. Conflict Resolution Skills

Centers shall provide each new student with instruction in basic conflict resolution techniques within the first 60 days of enrollment. At a minimum, instruction shall include:

a. Content
   1. Defining conflict and recognizing when it exists
   2. Developing strategies for dealing with conflict
   3. Identifying resources available to help resolve conflict

b. Opportunities to learn and practice conflict resolution techniques.

c. Explanation of the importance of conflict resolution skills in Job Corps and in the workplace.

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Rationale for Rating:

R2. Driver Education and License Attainment

Centers shall:

a. Review with each student who does not already possess a license, the steps necessary to attain a license; and document these steps in the Center Information System (CIS) through the student’s ESP. These actions will take place during CPP.
b. Provide each new student who does not already possess a driver’s license with instruction that will enable him or her to attain a learner’s permit.

c. Initiate driver training during CPP as described in Section 3.22 (Driver Education), whenever possible.

Strategy:

➢ Review Driver Education program. Determine how scheduling is done. Identify students who do not have a driver’s license and determine why they are not enrolled.

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Students can describe techniques for managing and resolving conflict.

Strategy:

➢ Interview staff and students to determine the effectiveness of the conflict resolution training. Have students give examples, if possible, of incidents that occurred on center where their newly learned conflict resolution skills were used.

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Rationale for Rating:

June 28, 2013
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2.9 CAREER DEVELOPMENT READINESS

PURPOSE

P1. To ensure that students are fully prepared for successful participation in the Career Development Period (CDP).

REQUIREMENTS

R1. Evaluation

Centers shall ensure that each student receives ongoing evaluations, conducted by a Career Management Team.

b. Each student’s Career Management Team shall conduct a formal evaluation prior to the student’s entry into CDP. The formal evaluation shall:

1. Assess the student’s progress and readiness to participate in career development activities.

2. Assist the student in clearly defining his or her initial long-term career, academic and social/behavioral goals and identifying short-term goals in these areas to be completed during CDP.

3. Collaborate with the student on identifying the personalized mix of career development activities that will move the student toward meeting or her career, academic and social/behavioral goals.

Strategy:

➢ Review CIS evaluation schedule to determine when students are evaluated. Do students and staff perceive this process similarly?

➢ Who is responsible for evaluations? When are these scheduled? Who is involved? Is there a specific format? Is the student involved in the process? Observe the evaluation process to determine student readiness for entry into CDP. Are all CPP elements reviewed/evaluated? Who participates in the evaluation? How is it documented?

➢ Review the CPP plan and related SOPs. Is policy adhered to and are procedures followed for all students? Determine what is done with students who do not meet CDP readiness criteria. Is appropriate remediation scheduled/provided as described in the plan?

➢ Interview students. Do they know the development activities available on center and when they are scheduled? Do they know the activities they may participate in to improve their evaluations?
R2. **Transition to Career Development Period**

Centers shall:

a. Assign students to career development activities based on each individual student’s progress and readiness to participate.

b. Schedule support services for each student, as needed, to address personal issues that still present barriers to full program participation.

**Strategy:**

➢ When are students scheduled into CDP? How is this determined? Is there a fast track process? Is there a process for addressing any remedial needs? Does everyone understand the transition process?

---

**QUALITY INDICATOR(S)**

Q1. Students express their long-term career, academic and social/behavioral goals and the short-term goals that will assist them in achieving their long-term goals.
Strategy:

- Ask students if they have a copy of their Evaluation of Student Progress. Are short- and long-term goals reasonable and attainable? Are students clear about these goals? Can they demonstrate their understanding of what they need to do to accomplish their goals?

- Find out if students are satisfied with their ESP. Did they get enough information to be able to decide their career goals? If not, what have they done to supplement this information? Do the steps in the ESP accomplish what they really want to do? If not, do they know and feel comfortable with using the center process to make changes to their goals?

- Ask students about their career management team. Who is on the team? Do they evaluate students regularly, both formally and informally?

- Ask students how they are involved in their ESP. Did they help plan out their training? Were they allowed to make changes in their career goals as their training progressed? Do they want to take their ESP with them when they graduate to help them find employment and guide them in their career?

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Sample Consolidated Rating Matrix

As noted in the PAG Preamble, Regional Offices have flexibility in weighting the scores of OA, Center, and CTS assessments based on a variety of factors. Career Preparation is inherently a center responsibility, and the sample matrix provided is exclusively for center use. Regions have the flexibility to eliminate or add factors to their matrix.

Regional Directors and/or Division Chiefs should develop the matrix prior to the assessment so that the Review Team understands what areas need to be reviewed and how the ratings are to be established.

Below is a sample matrix for use on Job Corps Center assessments.

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**Average Compliance Rating**

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The matrix above does not provide for any additional emphasis on specific PRH requirements or quality indicators. Regions have the flexibility to add specific requirements or quality indicators that they would like to emphasize as part of the assessment process.

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<td><strong>Exceptional (8/9)</strong></td>
<td>Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.</td>
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<tr>
<td><strong>Very Good (6/7)</strong></td>
<td>Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.</td>
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<tr>
<td><strong>Satisfactory (4/5)</strong></td>
<td>Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.</td>
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<tr>
<td><strong>Marginal (2/3)</strong></td>
<td>Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.</td>
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<tr>
<td><strong>Unsatisfactory (0/1)</strong></td>
<td>Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.</td>
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**Note:** A glossary of acronyms is located at the end of the PAG Preamble.
3.0 OBJECTIVES

To prepare students to enter and remain connected to the labor market, and/or obtain further education and training, by assisting them to:

- Acquire the foundation skills, specific knowledge, and competencies needed to achieve their career goals.
- Understand how to progress in the work environment.
- Move successfully from the learning environment to the work environment.

To provide a safe and secure living environment in which students:

- Experience personal growth.
- Learn self-management, personal responsibility, and both independent and community living skills.
3.1 CENTER PLAN

PURPOSE

P1. To ensure the efficient, effective, and integrated delivery of career development training to students to enable their successful transition from learning to careers.

REQUIREMENTS

R1. Career Development Plan

a. Centers shall prepare and implement a Career Development Plan (CDP) as part of the overall Career Development Services System (CDSS) Plan. The plan shall be submitted for Regional Office approval in accordance with Chapter 5, Management.

b. Career development services reflected in the plan shall be tailored to the individual needs of each student, provided throughout enrollment, and coordinated with career preparation and Career Transition Services (CTS) to ensure continuity of services to students.

c. At a minimum, the CDP shall address:

1. The rationale for the design of career development services and how that design will ensure provision of individualized services to assist each student in meeting his or her career goals.

2. Organization, to include detailed descriptions of:
   (a) How each component will be staffed;
   (b) How center staff (instructional and other) will collaborate to ensure that training and services are effectively delivered in partnership with all staff concerned;
   (c) How the center will ensure that Tests of Adult Basic Education (TABE®) will be implemented using the Student Testing System (STS) in a designated testing facility, following procedures for securing test materials, scheduling tests, and administering the tests;
   (d) How center-based and work-based learning will be scheduled and what interruptions to the schedule will be allowed;
   (e) How individualized services will assist each student in meeting all eight career success standards.
   (f) How the center will ensure the delivery of programs and services to English Language Learners (ELL).

3. Methods, materials, and activities to:
   (a) Teach each of the competencies required by this chapter.
      (1) Centers may use either materials and methods as outlined in Job Corps course guides or other materials and methods...
selected by centers to teach required competencies. Centers must define requirements for student completion of course materials and competencies. Centers must also describe how students’ progress in training will be documented in case notes, through the Evaluation of Student Progress (ESP), or other means.

(2) If a center elects to use Job Corps materials and methods to teach a set of required skills, the plan need only reference the relevant course guide.

(3) Regional Offices may direct centers to use specified Job Corps materials and methods for given subject areas if training outcomes do not meet targeted levels.

(b) Integrate academic, career technical, and career success skills development, and practice to impart knowledge and help students develop appropriate attitudes and behaviors in the context of the workplace.

(c) Encourage and support student certification attainment.

(d) Use center and employer work sites to teach required skills and competencies.

(e) Instruct students in workplace safety measures.

(f) Provide individual students with experiences and practice to help them meet each of the eight Career Success Standards.

(g) Acquaint students with diversity issues to promote respectful behavior and develop competency in responding to diversity issues.

(h) Utilize the Personal Career Development Plan (PCDP) to guide each student’s career progress and provide feedback on student achievements.

(i) Evaluate student readiness for CTS and ensure a smooth transition from center to post-center services.

(j) Provide students with options to achieve a high school diploma.

4. A description of the center’s student conduct system including incentives, rules and sanctions, procedures for adjudication of infractions, appeal procedures, and how behavioral expectations are related to the workplace.

5. Documentation of all center high school programs and center partnerships with local high schools (including charter schools) or school districts that serve Job Corps students. This written documentation must include:

(a) Names of all high school programs and school districts;
(b) Letters or certificates from the state department of education affirming that the center, and/or its high school partners, are accredited and recognized in the state in which the high school programs are located. The letter should indicate whether or not the schools are public, private, charter, special-purpose or other schools. If the state defers to a regional accrediting body for high school accreditation, a certificate or letter should be included from the regional accrediting body confirming accreditation for the high school programs (see Appendix 304). In addition, documentation should be included on the processes for assessing students for disabilities and programs for providing students with special education, if the center or a partner is subject to the requirements of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA) or Section 504 of the Rehabilitation Act of 1973 (see section 3.11);

(c) Memorandum of Understanding (MOU) with partner high schools;

(d) Operator or center Standard Operation Procedures (SOP) outlining requirements for students to obtain a high school diploma; and

(e) Sample diplomas and transcripts.

6. Documentation of the processes for assessing students for disabilities, and programs for providing students with special education, if the center is subject to the requirements of the Individuals with Disabilities Education Improvement Act of 2004 (IDEA) or Section 504 of the Rehabilitation Act of 1973 (see Section 3.11).

QUALITY INDICATOR

Q1. Center practices are in accordance with the center’s Career Development Plan.
Strategy:

- Request a copy of the Center Career Development Plan (CCDP). Is it current? Does it have Regional Office approval?

- Review the contents of the CCDP. Does it include all the required components specified in the Policy and Requirements Handbook (PRH), Chapter 3, Section 3.1, R1? Is each staff member knowledgeable about the plan and his or her role in implementing it?

- Review the center’s staffing and organizational charts. Do they indicate appropriate staffing levels to support the CCDP in each of the center’s departments?

- Review job descriptions. Do they indicate that CDSS responsibilities are allocated across departments?

- Is the center a diploma-granting high school? If so, is there documentation of how special education services are provided?

- Review the center’s CDSS Plan. Does it contain the following documentation: names of all high school programs and school districts; letters or certificates from the state department of education affirming that the high school programs are recognized as schools by those states; Memorandum of Understanding (MOU) with each partner high school; operator or center Standard Operating Procedures (SOP) outlining requirements for students to obtain high school diplomas; and sample transcripts and diplomas.

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Center practices are in accordance with the center’s CDP.

Strategy:

- Obtain a copy of existing center policy and procedures, a list of current center programs, and schedules. Are they consistent with the CCDP?
Interview staff. How are CDSS responsibilities assigned on center? Ask individual staff to describe their role in CDSS. Interview students. Ask them to describe which staff assists them in developing their career plans and learning employability skills.

Interview staff and students. Do center activities described in the plan address all aspects of employability training? Are staff and students aware of the center plan and their role in implementing it?

Review curriculum, classroom, and work-site materials. Do they address skills for students to meet academic, career technical, and Career Success Standards? What evidence is there that staff and student activities support the development of integrated programs?

Determine if the center plan addresses how it provides each student with individualized experiences, and practice to help him or her meet the Career Success Standards, especially the ones he or she does not meet.

Review the center standards of conduct. Determine if the policies are reflective of workplace and employability standards and processes.

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Rationale for Rating:

PRH 3.1 - Summary Rating

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August 6, 2013
3.2 ADMINISTRATION AND MANAGEMENT OF CAREER DEVELOPMENT SERVICES

PURPOSE

P1. To assure the efficient, effective, and integrated management of career development services for students.

REQUIREMENTS

R1. Managing the Learning Environment

Centers shall ensure that learning environments facilitate and support each student’s career development as follows:

a. Training facilities are safe, clean, orderly, and well-maintained.

b. Career Technical Training (CTT) facilities simulate workplaces in their layout, furnishing, and organization to the extent possible.

c. Current training-related materials and equipment are available in classrooms and CTT facilities.

d. Ample opportunities are available for students to attain industry certification, licensure, or pre-apprenticeship status.

e. Student-to-teacher ratio for instructional and training activities is 15:1 in accordance with Chapter 5, Section 5.2, except for CTT programs specifically authorized for lower ratios as specified in Exhibit 3-3. For purposes of defining training slots, one full-time student is equivalent to 2 training slots. Therefore, the 15:1 student-to-teacher ratio translates to a 30:1 slot-to-teacher ratio. Student-to-staff ratios for nationally contracted training programs shall be in accordance with contract provisions.

f. Staff shall:

1. Recognize positive behavior and achievement.

2. Intervene and correct inappropriate student behavior and non-performance.

3. Recognize and remediate student-learning difficulties.

4. Engage, actively instruct, and guide students.

5. Encourage students to be active participants in the learning process.

6. Maintain familiarity with current industry skill and safety demands and requirements.

7. Emphasize the relevance of training activities to career success.

8. Provide students with feedback on their progress.

9. Model, mentor, and monitor the Career Success Standards at all times.

g. CTT and academic instructors shall:
1. Remain current and knowledgeable regarding available industry certifications, prerequisites, and examination requirements.

2. Provide instruction and remedial training support that will enable students to overcome barriers in obtaining industry certifications or participating in Advanced Training (AT) or Advanced Career Training (ACT).

3. Provide contextual learning opportunities for students to improve academic skills in the CTT learning environment.

4. Collaborate in developing lessons, activities, and other instructional supports to ensure that industry certification requirements are addressed in the academic and career technical settings.

5. For CTT instructors, in particular, maintain a comprehensive working knowledge of current industry skills, safety, and health requirements.

Strategy:

- Visit classrooms, shops, and other student training areas. Are the areas clean and orderly? Are sufficient equipment, materials, textbooks, and other resources available for student needs? Do work areas reflect real work settings? Are the facilities and materials adequate to prepare students for certification, licensure, or pre-apprenticeship?

- Interview students. Do they have the tools needed to participate fully in their trade? Is equipment available to them for hands-on experience? Are students aware of available certifications for the industry in which they are receiving training?

- Interview academic and CTT instructors. Are they knowledgeable about the certification opportunities available to students? Do academic and CTT instructors collaborate to develop lessons, activities, and other instructional supports? How do they identify students that need remediation, and how is remediation handled? How are they informed of accommodations needed by students with disabilities in their areas, and what types of accommodations do they provide?

- Interview the Center Director and department managers. How do they monitor the delivery of career development services? How are outcomes monitored and action plans developed to address inadequate performance? How does the center ensure ongoing program assessment and continuous improvement?

- Review the center’s last corrective action plan submitted to the Regional Office to address concerns from the last regional assessment. Are corrective actions completed? If so, were they effective in addressing the concerns? If not, did the center continue to assess the problems identified and address them in more effective ways?

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R2. Scheduling

Centers shall:

a. In collaboration with each student, develop flexible, individualized training schedules tailored to the student’s individualized learning needs and career goals. Interruptions to the regular schedule shall be kept to a minimum.

b. Provide time for project-centered learning activities, field trips, and work-based learning experiences.

c. Develop a schedule that ensures that prior to graduation, students receive substantial practice and experience in working an eight-hour day or working hours and conditions consistent with the anticipated workplace.

d. Allow time for instructor collaboration, lesson planning, and career technical/academic integration activities.

Strategy:

- Review the scheduling system and related written policy and procedures. Are they reflective of what is documented in the center’s Career Development Plan? Is the design of the training day and schedule both flexible and conducive to meeting individual student needs? Review a sample of current student schedules and compare them to their PCDP. Do schedules reflect student needs as documented in their PCDPs?

- Determine if scheduling accommodates student practice in experiential learning consistent with an eight-hour workday environment. Interview students who are in career transition and ask them to describe their experience in this area.

- Interview academic and career technical instructors. Ask how often students are assessed and how their schedules are adjusted when needed. What types of academic/career technical integration activities do they engage in? How much time are they provided to collaborate or discuss strategies?
R3. Equipment/Clothing

Centers shall:

a. Ensure that equipment and facilities are equivalent and relevant to industry standards, and made available in the most cost-effective manner.

b. Maintain equipment in all learning environments in good repair.

c. Submit requests for equipment to the Regional Office for review and approval. Conservation centers shall submit such requests through agency channels.

d. Ensure that students are provided with industry-standard clothing and safety equipment, in accordance with the guidelines in Chapter 6, Section 6.5, Student Clothing.

Strategy:

- Interview instructors and observe in the shop and work areas. Is there sufficient working equipment to support the TAR requirements?

- Review the Business Management Plan and determine the types of clothing the contractor proposed for each career technical area. Observe to see if staff and students are appropriately dressed in industry-standard clothing and personal protective equipment.
R4. **Personal Tools**

a. For those career fields in which the personal ownership of tools enhances the employability of the student, centers shall provide tool kits to students who graduate from a center-provided CTT program, at no cost to the student. National Training Contractors (NTCs) are responsible for providing tools at no cost to graduates of their programs.

**Strategy:**

- Review center policy and procedures regarding the issuance of tool kits. Do all graduates from a particular career technical area receive tool kits, or does the center use a set of criteria? When are tool kits provided to graduates? Check if there is a log and review entries.

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**Rationale for Rating:**

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R5. **Student Certification and Licensing**

a. Centers shall provide testing, certification, and licensing, at no cost to students, where such testing, certification, or licensing is required for employment or enhances the student’s career readiness. Examples include high school equivalency (HSE) testing, driver licenses, and industry-specific CTT credentials. Students with disabilities must be informed of their right to request reasonable accommodation.

b. Training provided must enable the student to obtain a license or certification in the state where he or she will seek employment, if applicable.

**Strategy:**

- Interview the senior staff responsible for education and training (e.g., Education and Training Director or Program Director/Manager). Where applicable, are center programs certified? Determine what opportunities are available to students regarding certification, licensing, or pre-apprenticeship prior to separation.

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August 6, 2013
Interview the Career Technical Manager. When was the last time Industry Council members participated in a review of career technical programs to determine if industry standards are being taught? Who participated? What programs were reviewed? What was the outcome?

Is certification and licensing made available to students across all trades?

Have staff obtained necessary instructor certifications/credentials in accordance with industry standards?

Have trades been reviewed and approved for applicable program certifications (e.g., ASE, NATEF for Automotive Programs)?

Is the center an approved testing site for certification? Are staff serving as test proctors?

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**Rationale for Rating:**

**R6. Recordkeeping**

Centers shall:

a. Ensure CTT instructors record skill acquisition by rating the appropriate skill area on the e-TAR. This action (i.e., recording a rating level) represents verification to the student of skill attainment. The date entered does not necessarily indicate when the student completed the task. The date indicates the instructor’s assertion of skill proficiency, documenting that the student is able to perform the task to industry standards with little or no supervision. The student does not need to be present for duty in order for the instructor to perform the data entry process.

b. Ensure CTT instructors record credential attainment results in e-TAR credential tab.

c. Provide a copy of one or more of the following: credential attainment certificate and/or e-mail/electronic notification of pass/fail results from credential issuing party. This can be a hard copy in students permanent records file or uploaded into e-TAR system.

August 6, 2013
Strategy:

- Interview the Academic Manager. Other than the TABE and HSE exams, what methods are used to monitor and report student progress in academic areas?

- Review a sample of Training Achievement Records (TARs). Is there evidence that TARs are signed off as students meet the required competencies? Interview career technical instructors. Determine the process used to sign TARs. Do all CT instructors follow the same procedure? Examine a sample of completed TARs. Does the Career Technical Manager or designated administrator certify completed TARs? How are student skill acquisition and performance at WBL sites documented? How are they reflected on the TARs?

- Ensure that all TARs in use have received National Office approval.

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Rationale for Rating:

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**R7. Performance Assessment**

Centers shall:

a. Assess and monitor the delivery of the career development services to assure that it conforms with the approved center plan.

b. Monitor outcomes and take corrective action when outcomes fall below set goals. The National Office of Job Corps, in collaboration with Regional Offices, shall monitor and take corrective action when NTC outcomes fall below set goals.

c. Using state and local area labor market information and with the advice of employers and the center’s Industry Council, regularly assess the labor market demand for workers in the occupations represented on center, and initiate career technical change requests when needed.

Strategy:

- Interview the Career Technical Manager. What methods are in place to monitor performance of career technical programs?

August 6, 2013
Interview instructors. Are they familiar with the CTTRC? How does performance of CTT programs impact instructional methods? Is the Industry Council involved in providing current trade information?

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Rationale for Rating:

R8. Career Technical Program Changes

a. All requests to add, delete, expand, or reduce training offerings shall be made using the Career Technical Training Change Request Form in Appendix 307. Centers must submit the requests directly to the Regional Director for initial approval, while Civilian Conservation Centers (CCCs) must submit the requests through agency channels. For any CTT Change Request affecting an NTC program, centers must work closely with the respective NTC officials and the NTC COTR, as appropriate.

b. The Regional Director and Program Manager are responsible for the initial evaluation of change requests and shall forward the request and all supporting documents to the National Office of Job Corps to the attention of the Division of Educational Services, Career Technical Training & Certifications and Apprenticeships Team Leader, for review and final approval. In the case of federally operated centers, the federal operator and the Regional Director must mutually review and approve proposed changes prior to forwarding documents to the National Office of Job Corps for final approval.

c. The National Office of Job Corps has 30 days from receipt of complete CTT Change Request Forms and supplemental documentation to render a response or notify the Regional Office of its decision. The Regional Office will, in turn, inform the center operator of the National Office’s decision. When NTC programs are affected, NTC officials will be notified, concurrent with notification to the Regional Office.

Following approval by the Regional Director and the National Office of Job Corps, changes to center-operated career technical training programs must be

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written into contract requirements. In the case of federally operated centers, the federal operator and the Regional Director must mutually review and approve proposed changes prior to forwarding documents to the National Office of Job Corps for final approval.

d. Program, O*NET-SOC training title, Job Training Match title, or code changes to the Center Information System (CIS) must be approved by the National Office of Job Corps. The National Office will communicate all approved changes to the Job Corps Data Center (JCDC) for entry into CIS.

Specific roles and responsibilities for the timely processing and approval of requests for career technical training changes are detailed in Appendix 306.

Strategy:

- Compare the latest CTTRC to current career technical offerings. Have there been any CTT program changes? If so, request to see documented approval.

- Review center CTT offerings. Ask the Career Technical Manager to describe how the current offerings reflect current labor market standards and needs. Does the Career Technical Manager know the process for requesting CTT changes? Does the center have a process in place to regularly review CTT offerings and request changes to better meet the needs of the local and state labor market?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Systems are in place to ensure that training content, scheduling, method, and pace are tailored to the individual needs, abilities, and career goals of each student.

Strategy:

- Interview instructional staff and ask how they address different skill levels and styles of learning. How are student learning difficulties addressed? Are a variety of instructional techniques used? Is there an opportunity for hands-on learning? Individual instruction? Peer tutoring and project-based learning? Are a variety of materials used, e.g., video, written, spoken, computer-based?
Interview students in career technical and academic classes. What projects have they completed in this class? Can they show you their latest project? Have they worked together with other students as part of a team? Can they describe how their academic experiences relate to their career technical training and future employment?

Interview teaching staff in academics and CTT. When was the last time they participated in collaborative lesson planning or in the development of an integrated curriculum? Who attended? How often does this happen? Who participates? Do instructors use what is developed? Who is currently using an integrated curriculum and how are they using it?

Determine how teachers address different levels of learning and learning disabilities. Observe the classrooms and review curriculum and lesson plans for indications that all students are provided the necessary level of instruction to support academic progress.

Interview students and staff. Who updates the student PCDP? How often? Observe a student evaluation session. Is it interactive, with student participation in the process?

Interview students. How are positive behaviors and achievements recognized? In a focus group, ask students to describe how they have been recognized and what things motivated them to achieve their goals. Ask them to describe the process for participating in student government and other leadership positions on center. Have they participated in the student government or in a leadership role? Why or why not?

Observe staff during the week of the assessment. Do they model employability and promote behavior that supports Career Success Standards? Do they intervene immediately when students exhibit unacceptable behavior?

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Rationale for Rating:

Q2. Career technical training offerings and certifications are responsive to the labor market demands in high-growth, high-demand industries where graduates seek employment.

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3.3 PERSONAL AND CAREER COUNSELING

PURPOSE

P1. To provide ongoing assessments of the personal development, career development, and social development of individual students.

P2. To identify students’ career development needs and coordinate the delivery of center and community resources

REQUIREMENTS

R1. Personal Counseling

Centers shall provide ongoing personal counseling to students throughout enrollment, to include:

a. Availability of counseling services on weekends and in the event of emergencies.

b. Support services, to include assisting with AWOL retrieval; conferring with parents, Admissions Counselors, Career Transition Specialists, and social service agencies; and providing referrals to community resources, as appropriate.

Strategy:

➢ Request a copy of the counseling schedule. Is coverage available on the weekends or during off hours (what is procedure if an incident occurs)? Interview counselors. What is their professional background? Request a copy of the current caseload. Are they equally distributed? What is their involvement in AWOL retrieval, communication with parents, and/or other outside parties?

➢ Interview students. Do they know who their counselor is? Do they feel comfortable talking with their counselor about personal and career-related issues? Do they know who to see on the weekends or after the training day?

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Rationale for Rating:

August 6, 2013
**R2. Career Counseling**

Centers shall provide career counseling services throughout the student’s stay on center with the following features:

a. Ongoing structured, scheduled, and documented individual career counseling sessions, which may be scheduled as part of a student’s career development activities.

b. Management of students’ career development through student/counselor collaboration to assist students in:
   1. Setting short- and long-term goals.
   2. Developing strategies and identifying actions necessary for students to prepare for and attain certification.
   3. Identifying personal strengths and career challenges.
   4. Resolving personal issues affecting career readiness.
   5. Assessing transitional support needs and developing strategies to meet those needs.

c. Counselors must know and stay current on industry certifications offered and requirements for attainment.

d. Regular evaluation of student progress in meeting career goals and in updating the student’s Personal Career Development Plan, in accordance with Section 3.5.

**Strategy:**

- Interview counselors. When are they available to students? Are sessions scheduled or unscheduled? What is focus of sessions? Is it career counseling or personal counseling? How is session documented? What follow-up is provided? Review sampling of files.

- Review how counselors are involved in the development of PCDPs. Ask counselors to explain their role in CDSS. Are they familiar with certification opportunities and requirements?

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**Rationale for Rating:**

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August 6, 2013
R3. **Coordination of Services**

Centers shall develop a career management system for counselors to interact and share information with other departments and community resources, as needed and in accordance with Chapter 6, Appendix 601, Student Rights to Privacy and Disclosure of Information, to ensure the coordinated delivery of services to students, especially in assisting them to meet the rigor of the training program.

Strategy:

- Interview counselors and ask how they share information with other staff. Do they hold staff meetings, case management meetings, etc.?

- Ask counselors to describe their involvement in CDSS, recreation, residential living, student discipline, and student assessment. Ask how they are involved in the Evaluation of Student Progress (ESP) and working with students to meet PCDP goals.

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Rationale for Rating:

R4. **Reporting/Documentation/Recordkeeping**

Centers shall ensure that counselors maintain ongoing records of personal counseling sessions in accordance with Chapter 2, Section 2.4.

Strategy:

- Ask to see where files are stored. Are they in a secure location? Who has access to the files? Review a sampling of files (see attached sample checklist).

- Review counseling records. Do they indicate ongoing personal counseling sessions for all students? Are records consistent with requirements in PRH Chapter 4?
QUALITY INDICATOR(S)

Q1. Counseling services are effectively integrated into and coordinated with all aspects of center life.

Strategy:

- Interview career technical instructors. How do counselors support students in career technical training classes? How often do instructors talk with counselors? Do counselors advise instructors when students may be separated for disciplinary reasons? If so, do they have input into counseling plans for improvement in behavior? Are they involved with counselors in developing student PCDPs? Do counselors visit classes? Do counselors share information on a need-to-know basis?

- Interview academic instructors. Are counselors involved in education? Do they assist when students have learning difficulties? How? How often do teachers interact with counselors about individual students and their challenges? Do teachers feel it is effective to refer students to counseling? Do counselors visit classes? Do counselors share information on a need-to-know basis?

- Ask students how their counselors are involved in center activities. Ask them if they have discussed their future careers with their counselors. Have they received assistance in setting short- and long-term goals for training at the center and transition to jobs and independent living? How often do they discuss these things with their counselor?
Q2. Students view counselors as a resource in achievement of their career goals.

Strategy:

- Interview students who have just completed the Career Preparation Period (CPP). Do they have employment plans? Why did they select the trade they did? Did the CPP staff spend individual time with them and assist them in developing a career technical training plan? Does the student have a copy of the plan?

- Ask students what assistance counselors give in the development of their PCDPs. Can they express their career goals? Did they develop goals with their counselor? Do they regularly revisit those goals with their counselor to discuss progress, challenges, and changes? Who do they go to for assistance with career and personal concerns? Why?

- Interview CTS transition specialists. How do counselors assist them in transition planning with students? Are transition specialists a resource for community connections? When do counselors become involved in the transition process? Ask students to describe how counselors have assisted them in planning for their transition.

- Determine what role counselors play in evaluating students. Are counselors assigned to the student being evaluated? Do they encourage and support student involvement? Is the ESP confrontational or does it provide students with valuable insight and suggestions for addressing challenges in the training process? Is the evaluation process interactive, with all parties participating actively, including the student?
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August 6, 2013
3.4 STUDENT STANDARDS OF CONDUCT

PURPOSE

P1. To promote among students, standards of conduct that are expected and accepted in the workplace.

P2. To provide students with an opportunity to learn from their mistakes.

P3. To maintain an environment for students that is free from drugs and violence.

P4. To provide students with opportunities for due process in disciplinary proceedings.

REQUIREMENTS

R1. Incentives

Centers shall develop processes for recognizing students for positive behavior and performance, including rewards and what students must do to earn them.

Strategy:

- Interview the Center Standards Officer (CSO)/Student Personnel Officer (SPO). Is there an incentive program for students? How is it managed and by whom?

- Review the center’s incentive system. Are group and individual awards used?

- How often are student assemblies conducted and how are students recognized at these assemblies? Verify by reviewing student records for rewards/awards.

- Ask students how they are recognized for good behavior and accomplishments. Who can earn awards? What rewards can students earn? Question staff in various departments on how they recognize positive behavior.

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Rationale for Rating:

R2. Rules and Sanctions

Centers shall develop standards of conduct, including a set of rules and sanctions. To the extent possible, conduct expectations shall parallel workplace expectations, and shall
incorporate a policy of Zero Tolerance for Violence and Drugs. Each center’s policy shall include, at a minimum, those infractions and corresponding actions detailed in Exhibit 3-1 (Infraction Levels and Appropriate Center Actions). The following sanctions are prohibited:

a. Corporal punishment and measures designed to humiliate or degrade the student.

b. Physical force or solitary isolation. Physical restraint may be used only to the minimum extent necessary and only in situations that seriously threaten persons or property.

c. Dorm cleanup, KP, or other regular housekeeping chores, as a punishment.

d. Suspension of privileges for the dining hall, canteen, voting, religious services, or pay and allowances.

e. Restrictions to center in excess of 30 days.

f. Fines in excess of $5 per offense or per pay period.

g. Restitution in excess of $500.

h. Forced resignation from the program.

Strategy:

➢ Ask the CSO for a copy of student standards of conduct. How are students and staff held accountable for management of the standards?

➢ Conduct focus groups or student interviews to determine the effectiveness and validity of the rules and sanctions imposed on the center. Are students and staff aware of the policies? Does the center allow the student and employer input in policy development? Are policies clearly explained in the student handbook? Ask students and staff to describe the system. Do their descriptions match the written policy?

➢ Review the student handbook. Does it contain clear explanations of the behavior management, pay, and incentive systems?

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Rationale for Rating:

August 6, 2013
R3. **Investigation and Disposition of Incidents**

Centers shall conduct investigations, fact-finding boards, and review panels as follows:

a. Convene boards and panels in accordance with the guidelines in Exhibit 3-2 (Requirements for the Conduct of Fact-Finding Boards and Behavior Review Panels), and the boards and panels should only consider evidence relevant to the infraction.

b. Provide boards or panel with a written investigative report of the incident under consideration.

c. Recommend appropriate sanctions in keeping with the level of infraction as shown in Exhibit 3-1 (Infraction Levels and Appropriate Center Actions).

d. Report the outcomes of disciplinary boards and panels on the “Summary of Review Board Hearing” form.

**Strategy:**

- Interview CSO/SPO and review investigation procedures. Review investigative files. Review sample CRB cases. Were cases convened in the appropriate time frames? If possible, observe a case. Is all required documentation completed prior to and following the case? Are sanctions appropriate to the incident?

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**Rationale for Rating:**

R4. **Appeal Process**

Centers shall develop a process for the appeal of disciplinary decisions. The appeal process shall have the following features, at a minimum:

a. Students shall be allowed to appeal disciplinary decisions from lower organizational levels to higher ones.

b. Students shall be notified in writing of their right to appeal a decision of the Center Director to the Regional Appeals Board (RAB). Student appeals must be made within 30 days of their separation.

**Strategy:**
Ask the CSO for a copy of the process used for appeals. Has a written process been established and implemented? How are students notified of decisions of the center review board? When is appeal form provided to students? Do staff understand and follow the center’s appeal process?

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Rationale for Rating:

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**R5. Regional Appeals Board**

Each Regional Office shall establish a RAB to review student appeals of disciplinary discharge from the Job Corps program. The RAB shall operate as follows:

a. The Regional Director shall determine the composition of the RAB.

b. In reviewing cases, the RAB shall utilize only written documentation, to include, at a minimum, the student’s appeal letter and the record of the student’s hearing at the center. The RAB shall not hear oral testimony from interested parties.

c. The RAB shall rule on student appeals within 30 days of the receipt of the student’s appeal letter.

d. In making a decision, the options open to the RAB are to:
   1. Affirm the Center Director’s decision to discharge the student.
   2. Overturn the Center Director’s decision to discharge the student.
   3. Recode the separation (for zero tolerance offenses).
   4. Remand the case to the center for rehearing.
   5. Request additional information from the center and continue the RAB meeting to a later date.

e. If the RAB determines that all three of the following conditions are met, the RAB must affirm the disciplinary discharge of the student.
   1. There is substantial evidence to support the alleged facts of the case; and
   2. The procedural requirements of the law and Job Corps policies were adequately met; and

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3. The facts of the case constitute an offense for which disciplinary discharge is permitted.

f. If the RAB determines from the record that either of the following conditions pertain, the RAB must reverse the disciplinary discharge:
   1. The evidence provided does not support the facts alleged; or
   2. The facts are supported by the evidence presented but these facts do not constitute an offense for which disciplinary discharge is permitted.

g. If the RAB determines that substantial procedural requirements were not met, the RAB may take either of the following actions:
   1. It may reverse the Center Director’s decision to discharge.
   2. It may remand the case to the center for rehearing.

h. If the RAB determines that there is not enough information in the record to make a determination, the RAB may continue the RAB meeting to another date and request additional written information from the center, the student, or any other source.

i. If the RAB overturns the decision of a Center Director to discharge a student from the program, the Regional Office shall reestablish the student.
   1. If the student is allowed to resume training at the same center, the center shall reestablish the student in CIS and arrange for the student’s immediate return to the center.
   2. If the student is transferred to another center, the sending center shall take the following actions:
      (a) Reestablish the student in CIS
      (b) Effect the transfer in CIS
      (c) Provide the student with transportation to the receiving center
      (d) Provide a complete copy of the student’s personnel record to the receiving center.

j. Automatic appeal of felonies/misdemeanors (dropped charges/not guilty):
   1. If the student is found not guilty, or if the charges are dropped, the center will forward the case to the RAB for disposition.
   2. The RAB will decide if the student should be:
      (a) Reestablished at the same center
      (b) Reestablished and transferred to another center
      (c) Re-entered into CIS with a different code

   3. The center shall complete appropriate CIS entries as advised by the RAB.

k. Regional Offices shall maintain a log of all cases reviewed by the RAB and the disposition of the cases.
1. RAB decisions shall be communicated in writing to the student and the center.

m. RAB decisions are final and represent the official decision of the Secretary of Labor.

Strategy:

- Review student appeals. Are they administered fairly? Are students told of their option to appeal disciplinary separations to the Regional Office? Review any incidents in which the Regional Office overturned a separation based on a student appeal. Was the student accepted back at the center without consequences?

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Rationale for Rating:

R6. Reporting/Documentation/Recordkeeping

Centers shall ensure that all student incentives, infractions, and sanctions are documented and recorded using the automated Center Information System.

Strategy:

- Does center use CIS to document incentives, infractions, and sanctions?

- Review the center behavior policies. Review student disciplinary records. Does the center apply policies consistently? Is there proper documentation of infractions? How are student sanctions determined by staff? Are sanctions applied that are appropriate for the level of infraction? Review the appeal process. Does it allow students to appeal and is the process provided to all students who receive sanctions?
QUALITY INDICATOR(S)

Q1. Positive student behavior is recognized and encouraged.

Strategy:

- Ask students about the benefits or disadvantages to perfect attendance, poor attendance, or AWOL days. Who discusses attendance with them? What have their career technical training instructors told them? Residential staff? Counselors? CSO? What is the incentive system for positive behavior?
- Does the center encourage students who are not successful in following center standards of conduct? Are special activities available to encourage leadership and provide incentive for appropriate behavior? Are the standards punitive or do they provide support for improving student behavior?

Q2. Students regard the conduct standards system as fair.

Strategy:

- Review the two most recent student satisfaction surveys to assess student feelings regarding fairness of the center’s behavior management system.
Review center standards information to determine how many students have been reported or rejected by WBL employers for inappropriate behavior. Do ESPs address behavior? How many incidents involving student behavior have taken place in the community?

Interview students. Ask them who makes the rules on center? Have they been disciplined? What are the sanctions used on center? Are students punished equally? Are students involved in creating center standards of conduct? Does the CSO interact with the student government?

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Rationale for Rating:

Q3. Students feel safe and secure on center.

Strategy:

- Review Significant Incident Reports (SIRs) for completeness and to ensure that appropriate corrective actions have been taken to reduce any negative effects. If possible, follow up on corrective action indicated in several of the reports to ensure that the action was taken and reduced any negative effects. Talk to appropriate staff and students, if possible, to determine if the corrective action was appropriate and adequate.

- Interview students. What makes them feel safe/unsafe on center? How often are student belongings stolen? Are there areas on center where students feel unsafe? What can they do if they feel unsafe?

- Observe and listen during meetings and informal conversations for discussions of individual student issues in the hallways, cafeteria, and other areas where they can be overheard. Is student confidentiality observed? Are student records adequately secured?

- Review center incident reports. Is there follow-up when safety issues are reported?

- Interview students in a focus group. Do they know behavior expectations at the center? Do they know the consequences for violating center standards of conduct? Ask for examples. Ask students to relate any experiences they have had with the center’s behavior management system. How are appeals handled? Is there consistency in how the drug and alcohol/zero
tolerance policies are applied? Is the system fair? Ask about the types of sanctions applied for disciplinary infractions.

- Interview students in a focus group. How does the center address harassment? Hazing? Gender, ethnic, and other bias? Who is the center equal employment opportunity (EEO) staff person? Have any students been involved in EEO complaints? How were complaints handled? Review EEO records for compliance.

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Rationale for Rating:

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August 6, 2013
3.5 EVALUATION OF STUDENT PROGRESS

PURPOSE

P1. To provide students with periodic feedback and assessments of progress in achieving their career development goals.

P2. To collaborate with students in setting or revising their short- and long-term goals that will lead to achievement of career goals.

P3. To motivate and encourage progress and achievement.

REQUIREMENTS

R1. Frequency

a. Centers shall ensure that each student participates in ongoing evaluations, with appropriate staff, at least every 60 days.

b. Each student’s career management team shall conduct a formal evaluation prior to the student’s entry into CDP and CTP, at a minimum.

c. Special evaluations may be scheduled as needed at any time during a student’s enrollment.

Strategy:

- Pull a CIS report on the student ESP schedules to determine if ESPs are being administered every 60 days. If anomalies are observed, interview staff and/or management to determine the reason.

- If possible, sit in on an evaluation. Who conducts the evaluation? Is student feedback solicited? Review a sample of student files to determine if ESPs are occurring during required time frames.

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Rationale for Rating:

August 6, 2013
R2. **Content of Evaluations**

a. Evaluations shall include the assessment of student progress in all major career development areas: academics, career technical training, industry certification attainment (if applicable), work-based learning (if applicable), social development, and recreation.

b. Evaluations shall include all eight Career Success Standards as well as any additional expectations the center wishes to evaluate. Evaluations shall be calculated as follows:

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c. Each student will be provided with a schedule of individualized projects and activities to assist him or her in meeting the Career Success Standards in which a “Needs Improvement” rating is received.

d. As part of each evaluation, staff shall collaborate with students in setting, affirming, and/or revising short- and long-term training and career goals. At a minimum, the student’s Personal Career Development Plan shall be updated, as a result of each evaluation, to reflect accomplishments and goal revisions.

e. Students shall be evaluated by career development staff who are in direct contact with them, such as counselors, instructors, residential advisors, and work site supervisors. Evaluators shall discuss their evaluations with students privately and in person.

f. Each student shall be provided with an updated copy of his or her Personal Career Development Plan following each evaluation, whenever the plan is changed.

Strategy:

- Interview counseling staff. Who is responsible for conducting evaluations? What is the process? Review students’ CIS records to determine the content of previous ESPs. Are evaluations career focused? Do they cover required areas? Is student input solicited and included in plan? Is student provided a copy of the Personal Career Development Plan (PCDP)? Are both the ESP and the center’s schedule of projects and activities utilized to assist students in meeting the standards?

- Ask a staff member to view a student’s CIS case notes. Do staff from different departments communicate with each other about the student’s performance?

- Observe staff and student interactions. Do you observe informal evaluations of student behavior taking place? For example, do staff stop students and correct their behavior if they...
are not exhibiting appropriate behavior? Do staff ignore negative behavior or divert responsibility to other staff? Do staff recognize students for exemplary behavior?

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Rationale for Rating:

**R3. Reporting/Documentation/Recordkeeping**

Centers shall document evaluations in the automated Center Information System (CIS).

Strategy:

- Review sample student files in CIS to determine if information is entered into student’s PCDP following an ESP.
- Review student PCDPs. Do they include goals and strategies to address areas needing improvement? Do they include goals in the major career development areas as defined in PRH Section 3.5? Do they include student accomplishments?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Students can identify and assess their progress, achievements, areas needing improvement, and career readiness.

Strategy:
Interview students. How are program goals communicated to students? Do students understand the goals and objectives of CDSS activities they are involved in? Can they articulate the reasons they are enrolled in Job Corps and the goals they want to accomplish while in the program? How do the programs at the center assist them in accomplishing their personal and professional goals? Does their PCDP reflect their goals and progress?

Review documentation of PCDPs, per PRH Section 3.5 requirements.

Ask how students and staff are involved in assessing student progress and providing feedback on student achievements. Interview students and staff to find out how they are using the PCDP to encourage students to develop goals, achieve them, and focus on long-term career success.

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Rationale for Rating:

Q2. Students can describe their short- and long-term career goals.

Strategy:

Interview students. Can they articulate short- and long-term goals? Do ESPs and the PCDP help them to evaluate current goals and set new ones? What are they doing that will help them achieve their short-term goals? How will these short-term goals move them toward their long-term goals and career aspirations? Do they understand how to plan for their long-term training?

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August 6, 2013
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August 6, 2013
3.6 CENTER-BASED LEARNING STANDARDS

PURPOSE

P1. To establish minimum standards for curriculum design, development, and implementation throughout the Career Development Period (CDP).

REQUIREMENTS

R1. Instructional Strategies and Materials

Centers shall:

a. Deliver career development services through a combination of center-based and work-based learning experiences designed to assist students in achieving their individual career goals.

b. Tailor instructional methods and expected rates of progress to the learning styles, abilities, and career goals of individual students.

c. Deliver training in the context of projects or workplace situations, using workplace materials and employer and Industry Council input whenever possible.

d. Develop year-round job-shadowing opportunities with community, industry, and employers, which will enhance students’ educational and career technical skills training.

e. Ensure instructor collaboration to identify instructional strategies and develop lessons, activities, and material that integrate academic, career technical, social development, and career readiness competencies to ensure that students meet the rigor of training programs and certification requirements.

f. Develop and deliver student career development activities using materials and equipment that support the use of the following instructional approaches:

   1. Hands-on activities
   2. Large and small group activities
   3. Individual, self-directed activities or projects
   4. Class discussions
   5. Field trips
   6. Project learning
   7. Job shadowing
   8. One-on-one tutoring
   9. Multimedia
   10. Individualized, programmed learning

   g. Develop techniques for assisting students in becoming independent learners, to include:

August 6, 2013
1. Alternative learning strategies
2. Study skills
3. A variety of analytical approaches
4. Memorization techniques
5. Goal setting for life-long learning
6. Self-advocacy skills for students with disabilities

Strategy:

➢ Interview the Academic Manager and ask how academics is staffed and managed. What curriculum is being used? Is instructor feedback solicited? Are different learning styles addressed? What instructional methods are used?

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Rationale for Rating:

R2.  **Curriculum Content Areas and Competencies**

Centers shall provide instruction in the following content areas. Specific required competencies are listed in the relevant sections of this chapter. Courses may be designed to include competencies from different content areas.

a. Reading
b. Mathematics
c. HSE Certification and/or High School Diploma
d. English as a Second Language
e. Career Technical Training
f. Wellness
g. Information Technology
h. Driver Education

Strategy:
Review academic class offerings. Are instructors available for each area? How are classes scheduled? Are class ratios appropriate?

Observe classroom and other training situations. Is there a focus on workplace standards? Are classrooms reflective of real work situations? How? In what ways could they be improved?

Review the competency areas taught at the center. Are any taught in an integrated manner, such as multicultural awareness in the context of career technical instruction? Career Success Standards in the context of CTT projects? Mathematics and communications in the context of a WBL assignment?

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**Rationale for Rating:**

**R3. Course Structure**

All required content area competencies shall be integrated into a variety of courses. Centers shall incorporate the following course design components.

a. Content that includes, but is not limited to, nationally required competencies;

b. Prerequisite competency levels for placement into the academic course based on diagnostic testing;

c. Individual and group lessons or project assignments that help students master course competencies;

d. Clearly established performance levels (standards of proficiency or passing scores) for competencies, tasks, assigned projects, and/or units of study;

e. A definition of course completion stated in terms of performance level of demonstrated competencies;

f. Methods to identify and diagnose the needs of students who have difficulty progressing;

g. Methods to assess progress toward certification (where applicable);

h. A course guide for instructors that documents how the components above work together to create a course of study; and

August 6, 2013
i. Methods for evaluating the effectiveness of course design and delivery.

Strategy:

➢ Visit classrooms. Are students engaged in the learning process? What instructional methods are used to engage students? Are there evaluation methods to monitor student progress?

➢ Observe a CTST project. Is the instructor relating project activities to job requirements? Ask students in the project what special skills are required by their career pathway. Are they learning those skills? Will students receive any certifications/credentials? What jobs will they be qualified for?

➢ Interview students. Are they aware of certification opportunities and their requirements? Can they articulate the impact of certification on their job potential?

➢ Observe academic classes. Are students discussing employability? Are they working specifically toward high school equivalency certificates or high school diplomas? Are reading and math taught in the context of employability and workplace expectations?

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Rationale for Rating:

R4. Testing

Centers shall use formal testing procedures to evaluate the overall progress and mastery level a student has achieved in each content area, including the high school equivalency (HSE) tests, and other tests. Tests of Adult Basic Education (TABE) shall be administered in accordance with procedures specified in TABE requirements and instructions (Appendix 301) to assess:

a. The reading and mathematics capability of all students at entry in order to place them at appropriate training levels and course of study.

b. The achievements of students in reading and mathematics during their enrollment in Job Corps.

Student mastery of career technical skills shall be verified through trade-related certification testing, as applicable.

Strategy:

August 6, 2013
How and when is testing provided for TABE and HSE?

Interview the TABE instructor/administrator. Review TABE testing procedures for compliance, per PRH Section 3.6. Review a TABE report and assure that testing is completed within required time frames. Ask the administrator for justification for any tests out of compliance.

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QUALITY INDICATOR(S)

Q1. Students can describe the requirements of their training and how those requirements relate to their career goals.

Strategy:

- Interview students in a focus group. Can they describe their TARs? Have they participated in CTT projects? What skills are they learning in class and on CTST projects? How do they feel TARs and CTST relate to the skills they will need on the job? Can they describe their career goals and how their career technical training fits them? Are any students preparing for certification tests in their career technical training? If so, how has class prepared them for the test?

- Interview career technical instructors. Review TARs and determine student involvement in completing TARs with instructors and identifying learning goals based on TAR achievement.

- Review Appendix 301 for guidance on acceptable test accommodations. Does the center administer test accommodations based on documented disabilities?
**Rationale for Rating:**

**Q2.** Staff and employers involved in the career development of students collaborate effectively in the development and delivery of training.

**Strategy:**

- What role has the Industry Council played in reviewing career technical and academic training at the center? How do individual members and the full council provide input into center training? When was the last time the Industry Council was involved in that process?

- Review WBL agreements with local employers. Do they include expectations that employers will assign job tasks that align with TAR skills? Are there specific job descriptions for student workers? Can employers describe student learning goals?

- Interview students assigned to WBL. How do they learn on the job? What do they feel is the most important skill they have gained in WBL? Why is that skill important? How does it prepare the student for her or his career or employment goals? Ask students to explain which TAR skills they are learning on the job. Does their supervisor review their progress? Does the WBL coordinator visit the site?

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**Rationale for Rating:**

**Q3.** Staff is able to explain how a given course fits into the center’s overall curriculum and how the various components work together to support student career development.

**Strategy:**

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August 6, 2013
Interview staff. Can instructors explain how their courses fit into the center’s overall curriculum?

Interview career technical and academic staff. Ask them to describe the center CDSS plan. How does their class/program contribute to CDSS goals? How do they contribute to employability? Ask for examples of instructional methods used (do they reflect the requirements of PRH Section 3.6?). How do instructors collaborate with other staff?

Interview the Wellness and Driver Education instructors. How are their courses included in the overall training goals of student PCDPs?

Ask instructors to describe how courses are evaluated for effectiveness. How often does this occur? What is the system for improvement if courses are not effective in meeting the needs of students, especially those who do not progress well?

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Rationale for Rating:

August 6, 2013
3.7 CAREER SUCCESS STANDARDS

PURPOSE
P1. To provide students with a center culture that regularly fosters opportunities to learn and practice a set of behavioral expectations that support employability and social development for career success.

REQUIREMENTS
R1. Required Career Success Standards

Centers shall ensure students leave Job Corps with proficiency in the following eight Standards and associated competencies:

a. Workplace Relationships and Ethics

STANDARD: The student will leave Job Corps with the ability to productively interact with co-workers and deal with problems and situations with honesty, integrity, and responsibility.

COMPETENCIES:
1. Follows and promotes workplace policies and procedures, including good attendance, being on time, and dressing appropriately for the job.
2. Understands and supports organizational goals and structure and follows the chain-of-command.
3. Observes and practices safety standards.
4. Develops productive relationships with members of his or her team.
5. Responds well to supervision.
6. Maintains confidentiality and personal trustworthiness.
7. Understands and supports the concept of customer service.

b. Interpersonal Skills

STANDARD: The student will leave Job Corps with the ability to get along with others and adjust to a variety of social and professional situations.

COMPETENCIES:
1. Takes an active role when working in teams.
2. Exhibits friendly behaviors and works well within the culture of a group.
3. Recognizes and respects individual differences and viewpoints.
4. Manages and resolves conflict with varied negotiation techniques.
5. Demonstrates flexibility in adjusting to a variety of situations.
6. Recognizes and manages emotions such as sadness, depression, frustration, and anger.
c. Personal Growth and Development

STANDARD: The student will leave Job Corps with the personal skills, attributes, and behaviors that foster confidence and drive for life-long growth.

COMPETENCIES:
1. Uses knowledge of personal strengths, weaknesses, and values in decision-making.
2. Demonstrates resilience when receiving both positive and negative feedback.
3. Maintains a healthy lifestyle by managing physical, emotional, and social aspects of daily life.
4. Uses social networks when balancing work and personal life.
5. Exhibits self-respect and a positive self-esteem.
6. Takes initiative and uses opportunities for advancement.

d. Independent Living

STANDARD: The student will leave Job Corps capable of finding, managing, and using the resources needed to maintain employment, satisfy physical and emotional needs, and lead a productive life as an independent adult.

COMPETENCIES:
1. Plans and manages time, money, and other resources to support him/herself.
2. Uses available resources to find housing, transportation, and employment and to make informed consumer decisions.
4. Creates and maintains an appropriate support network.
5. Uses creative problem-solving skills.

e. Career and Personal Planning

STANDARD: The student will leave Job Corps with a personal plan that outlines a step-by-step process for entering and advancing in a fulfilling career.

COMPETENCIES:
1. Sets and redefines short and long-term goals.
2. Acquires, organizes, interprets, and evaluates information from career assessments and work-based learning experiences.
3. Completes activities that support career planning. These may include a generic resume, sample cover letter, and letters of recommendation.

f. Communications
STANDARD: The student will leave Job Corps with the ability to listen actively, follow directions, and communicate with others to solve problems and accomplish tasks.

COMPETENCIES:
1. Expresses and supports ideas through oral, written, and nonverbal communication, such as body language, volume, and tone.
2. Responds to and acknowledges other people’s views.
3.Follows directions and asks for clarification.
4. Understands, uses, and explains procedures.
5. Uses appropriate language when addressing different audiences.
6. Demonstrates active listening skills.

g. Multicultural Awareness

STANDARD: The student will leave Job Corps valuing diversity, practicing cultural sensitivity, and able to work with people of different backgrounds and cultures.

COMPETENCIES:
1. Understands and appreciates a variety of cultural perspectives and how those enhance productivity.
2. Demonstrates the ability to value diversity in the workplace.
3. Understands cultural differences in communication styles.
4. Positively interacts and fosters relationships with people of different backgrounds.

h. Information Management

STANDARD: The student will leave Job Corps with the ability to interpret and evaluate data, organize and maintain information, and use technology to perform work.

COMPETENCIES:
1. Obtains information from existing sources, including the Internet.
2. Evaluates the relevancy, accuracy, and appropriate use of data.
3. Organizes, maintains, and uses information.
4. Demonstrates capacity to connect data to personal and professional success.

Strategy:

➢ Review the center’s CDSS Plan. Have the Career Success Standards been integrated into this plan?
What methods and resources does the center use to assist students in meeting the Career Success Standards? How does the center evaluate students (both informally and formally) on meeting the Standards?

Interview students. Have they been involved in diversity training? Do they understand the competencies associated with the Multicultural Awareness Career Success Standard? Ask them to describe the activities they are involved in to improve their competency. Do they think the center promotes respect for all students?

Does the center value the cultural diversity represented by staff and students?

What activities are available to broaden awareness of different groups of people, including their culture, race, ethnicity, age, gender, and disability, for example? Observe posters and other materials. Do they represent many cultures and ethnic groups?

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Rationale for Rating:

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**R2. Strategies for Delivery**

Centers shall adopt strategies that provide diverse opportunities for each student to learn, practice, and develop competencies to meet all eight Career Success Standards via:

a. Integration of the Standards into all phases of the program and all departments on center.

b. Integration of the Standards into formal academic and career technical skills instruction.

c. Individual and group lessons or project assignments held during and after the training day and on weekends to help students master competencies in all Standards.

d. Clearly established performance levels (correlated to the Evaluation of Student Progress) for competencies, tasks, assigned projects, and/or activities.

e. The needs of students who have difficulty progressing are addressed and documented in the PCDP.

August 6, 2013
f. Methods for evaluating the effectiveness of design and delivery of the Career Success Standards are in place.

Centers shall not establish a stand-alone class to teach to the Standards.

The Standards must be integrated into all training and center activities.

Strategy:

➢ Review the center’s CDSS plan. Ensure that the center is not holding a CSS class to teach the Standards. If it is holding a one-size-fits-all class, provide them with recommendations to implement the strategies listed above.

➢ What specific activities and projects are taking place during and after the training day and on weekends to help students meet the Career Success Standards? Does the center have a formal schedule for these activities and how is it developed and updated? How are students scheduled into the activities? How is students’ participation evaluated and documented? How are staff selected and scheduled to lead these activities?

➢ Interview students participating in an activity. Do students understand why they are participating in the activity and can they articulate what they hope to learn and achieve? Do staff inform students that the activity is being held to help them meet a given Career Success Standard?

➢ Interview and observe students. Are projects and activities scheduled at appropriate times for students?

➢ Interview staff. Are the appropriate number of staff available to run and monitor these activities? Are projects and activities scheduled so that staff are not overworked?

➢ Are students appropriately evaluated on the projects and activities to determine if they need further work on a Standard? How are they informed of their progress at the completion of an activity? How is this participation documented?

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Rationale for Rating:

August 6, 2013
R3.  **Center Culture**

Centers shall establish behavioral expectations that promote a safe, respectful, and goal-oriented culture that fosters personal responsibility and mutual growth. Center culture must be maintained by:

a. The use of positive peer influence to establish shared assumptions and behavioral expectations.

b. The consistent modeling and mentoring of behavioral norms by all center staff.

c. Promoting an environment where students gain a sense of belonging and self-esteem.

**Strategies:**

- Interview students and staff. Are staff members mentoring and modeling appropriate behavioral norms? Do students demonstrate appropriate behaviors?

- Observe staff and students. Are students and staff promoting a center culture that is safe, welcoming, and supporting for all?

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**Rationale for Rating:**

**QUALITY INDICATOR(S)**

Q1. Students demonstrate appropriate behavioral expectations on center, in the workplace, and in the community.

- Do students demonstrate appropriate workplace behaviors? If not, do staff or fellow students address the negative behavior and provide methods to modify it?
Q2. Students are able to model appropriate behaviors, mentor other students, and monitor others for appropriate behavior.

Strategy:

➢ Observe students. Are students friendly and do they communicate with you? Do you see students acting as models, mentors, and monitors to fellow students?

➢ Do students demonstrate appropriate workplace behaviors? If not, do staff or fellow students address the negative behavior and provide methods to modify it?

Q3. Students and staff are partners in sustaining a center culture that is safe, welcoming, and supportive for all students, staff, and visitors.

Strategy:

➢ Review the latest Student Satisfaction Survey. Look at the responses to questions that pertain to student perceptions about their relationship with various staff as well as the center’s safety. Do they indicate positive relationships? Do students feel safe on center?
Review SIRs. Look at data on length of stay for students who were separated for disciplinary reasons in the previous three months. Do you see any patterns in student behavior? How long do students stay on center, on average? Interview and observe students and staff. Have they identified any trends in behavioral problems or student retention?

Inventory and review leadership opportunities. What are the criteria for participation? Talk with students. Do they feel motivated to assume leadership positions? What are the incentives or rewards?

Walk around the different common areas where students interact. Are students friendly and do they communicate with you? Interview and observe students. Do students take ownership and pride in their center? Do students feel safe on center?

Observe student and staff relationships. Interview students. Do staff have high expectations for every student? Do students feel staff care about them? Do staff and students know, trust, and respect each other?

After a day at the center, reflect on how you felt being there. Did you feel welcome at the center? Did the center seem to operate with a common set of values, attitudes, or behaviors?

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3.8 WORK-BASED LEARNING STANDARDS

PURPOSE

P1. To provide opportunities for students to:
   a. Develop a further understanding of career opportunities, employer expectations, and the impact of postsecondary education in the workplace;
   b. Apply their newly acquired skills in the workplace;
   c. Learn new career technical skills and workplace competencies.

REQUIREMENTS

R1. Work-Based Learning Program

Centers shall:

a. Incorporate work-based learning (WBL) as a primary instructional approach to the delivery of applied and contextual training.

b. Implement a structured WBL program that:
   1. Involves students in work experiences related to the career field for which they are preparing.
   2. Occurs at employer work sites. To the extent such sites are not accessible, structured on-center work sites and off-center Career Technical Skills Training (CTST) projects shall be established.
   3. Relates closely with center-based learning activities.
   4. Provides reasonable accommodation for students with disabilities, as appropriate.

c. Provide opportunities to ensure that each student participates in WBL:
   1. WBL shall consist of multiple assignments that progressively vary in duration and complexity as the student completes established benchmarks in their CTT (see Appendix 308).
   2. Home-based WBL assignment is limited to a maximum of 6 weeks, as specified in Chapter 6, Exhibit 6-1. The Regional Office, at its discretion, may grant a waiver to extend the six-week limit, not to exceed 6 additional weeks (30 additional training days), if there is reasonable expectation of full-time employment. A written request must be submitted to the region with supporting documentation, such as a letter of request from the employer, prior to the end of the student’s initial assignment.
   3. Center-specific criteria and procedures for student participation in WBL and assigned staff to support the center’s WBL activities should be documented in the center’s Career Development Plan.

Strategy:

August 6, 2013
 Review center’s WBL program. Is the program detailed in the center’s CDSS Plan? Has the center established specific criteria and procedures for student participation in WBL? How and when are students informed of WBL requirements?

 Interview the senior manager responsible for the WBL program. What activities are considered WBL in CPP? How is participation monitored and documented? How does the center evaluate the quality and effectiveness of its WBL program? How does the center collect feedback from work sites? From students?

 Determine how the center uses employer work sites and on-center WBL assignments to teach competencies. Review a sample of both on- and off-center WBL assignments. Do they include job descriptions, goals, and objectives for learning career technical and employability competencies?

 Interview employers who are involved in WBL. Are there clear, written agreements with employers that outline training objectives? Ask employers to describe on-site training provided for students in WBL. Ask if center staff and the student are involved in developing learning goals. Who assesses student progress? How are employers involved in documenting skill attainment? Who teaches workplace safety and when?

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Rationale for Rating:

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**R2. Employer Partnerships**

Centers shall develop partnerships with private and public employers to secure WBL opportunities for students at employer work sites.

Strategy:

 Request list of WBL sites. Who is responsible for finding WBL opportunities for students? Are Career Technical Instructors included in the process?

 Interview Career Technical Manager and employers. How are students matched with employer needs? How are employers made aware of the need for reasonable accommodations for a student with disabilities? (Note: Accommodations should be provided at WBL sites.)

August 6, 2013
R3. Work-Based Learning Agreements

Centers shall develop a written agreement with the employer when a student is assigned to a work site. The agreement shall include the following provisions:

a. Blanket provisions:
   1. Centers shall develop a written agreement with the employer when a student is assigned to a work site. The agreement shall include the following provisions:
   2. The employer agrees to: provide direct supervision and workplace mentors to students; assist students in achieving agreed-upon career technical and academic skills; document student achievements and competencies, and provide an evaluation of the student’s career success skills; provide a safe environment (see Chapter 5, Appendix 505); support industry-specific certification requirements, as applicable; and not discriminate against students with disabilities and to provide reasonable accommodation as determined by applicable state and federal law.
   3. The center shall monitor student performance and work closely with the employer and workplace mentor to provide training and resolve problems that arise.
   4. The student shall not displace employees at the work site.
   5. The employer adheres to all federal and state laws and regulations regarding employment and working conditions.
   6. The student is considered an employee of the federal government for purposes of medical coverage under the Federal Employees’ Compensation Act (FECA).
   7. In paid WBL situations, an employment relationship exists between the employer and the student; therefore, the provisions of the Fair Labor Standards Act are applicable.

b. Student-specific provisions:
   1. The name of the student’s supervisor at the work site.
2. The hours of work, length of employment or training, and rate of compensation, if applicable.

3. The competencies (or sections of the student’s Training Achievement Record [TAR]) in which the student will be trained at the work site.

4. A process for notifying the center in the case of student absence or injury.

5. A process for notifying the employer in the case of student absence (i.e., winter/summer break, unexpected student absence, center function).

6. A schedule/format for providing feedback to the center and the student about the student’s performance.

Strategy:

- Ask the WBL Coordinator for a list of employers with whom the center has existing MOUs and a list of all sites where students are currently assigned. Are all current sites covered by MOUs?

- Review a sample MOU. Do MOUs outline the employer’s responsibilities (including student assessments)? Do they outline the center’s accountability and monitoring processes?

- Interview the WBL Coordinator. Who is responsible for work-site monitoring? How is attendance reported? Does the center use a standard assessment process and form? Check if this aligns with the CCDP. How are learning objectives communicated with the work-site supervisor? Are TARs provided to employers? Are there specific job descriptions for student workers?

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Rationale for Rating:

R4. **On-Center Work-Based Learning**

Work-based learning may occur on center, with the center as the employer. On-center WBL shall be formally organized and shall use written agreements similar to those used for off-center WBL. The agreements shall:

a. Assign the student to a single supervisor.

August 6, 2013
b. Establish the length of the assignment, hours of work, and rate of pay, if applicable.

c. Specify the TAR items and other employer-specific competencies to be attained by the student.

d. Provide for written feedback from the on-center work site, including an assessment of the student’s career success skills.

Strategy:

➢ Is there an MOU for center-based agreements? Do agreements outline staff responsibilities (including student assessments)? Do they outline accountability and monitoring processes? How is attendance reported?

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Rationale for Rating:

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**R5. Career Technical Skills Training (CTST) Projects**

a. Project-Based Training

Centers offering training in construction careers (and other career technical offerings that are eligible for CTST funding, as outlined in Appendix 303, Career Technical Skills Training) shall provide training to students in the eligible career technical areas through work on construction or manufacturing projects.

b. Project Planning

1. Centers with career technical training programs that are eligible for CTST funding shall submit an annual CTST Plan to the Regional Office for approval. Procedures for preparing and submitting the plan are outlined in Appendix 303.

2. Upon approval by the Regional Office, centers shall implement the CTST Plan in accordance with the procedures contained in Appendix 303.

c. Safety

Before initiating a construction project, centers shall assure that:

1. The project has been evaluated and a job hazard analysis has been conducted by the center Safety Officer for possible safety and environmental hazards and their remediation.
2. All students who work on the project are trained in the safety practices relevant to the hazards identified, prior to performing work on the project.

3. All appropriate safety equipment is provided to students and staff, and a copy of the job hazard analysis is posted at the work site.

Strategy:

- Review the center Career Technical Skills Training (CTST) plan. Interview instructors who supervise CTST projects. Review project overviews and plans for integration of academic competencies. Is the CTST plan implemented fully? Do instructors and students focus on mastering Career Success Standards? Ask how integration occurs. Who teaches workplace safety and when?

- Review the approved CTST plan. Check the Job Hazard Analysis. Who conducted them and are they complete and signed? Have any changes been made to the plan? Were these approved by the region? Ask to see the documentation. Do projects promote collaboration among students from different career technical areas?

- Interview the CTT Instructors. How are students involved in the CTST planning and evaluation process? How are students assigned to specific projects? How is the quality of student participation evaluated? If a student shows little or no progress, what steps are taken?

- Interview the CTST Coordinator. Pick a few projects and check the status of these projects. Are schedules being met? If there is no progress, is there a plan for completion?

- Observe a CTST work site. Are students engaged in activities? Are they being monitored? By whom?

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Rationale for Rating:

**R6. Work-Site Monitoring**

Centers shall monitor all active WBL sites to ensure that students are receiving quality training in a safe environment. Center instructors and other staff shall visit active work sites on a regular basis to:
a. Observe and counsel students.
b. Ensure that the training needs of the students are being met.
c. Determine, in collaboration with the work-site supervisor, what on-center activities might be needed to support training at the work site.
d. Visually inspect the work sites at least monthly to ensure students are placed in a safe and healthful working environment in accordance with Chapter 5, Section 5.15 R5. More frequent visual inspections are encouraged according to hazards associated with the WBL site and/or available resources.

Strategy:

➢ Review the center’s documented procedures regarding WBL. Who is responsible for monitoring sites? How often are site visits conducted? What does site monitoring entail and what documentation is maintained?

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Rationale for Rating:

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_R7. Reporting/Documentation/Recordkeeping_

Centers must document and record student WBL assignments and progress using the Work-Based Learning Menu in the training module of the Center Information System.

Strategy:

➢ Request a list of students currently on WBL assignment. Review their CIS files to see if appropriate entries regarding WBL assignments are noted.

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Rationale for Rating:
QUALITY INDICATOR(S)

Q1. Center staff, employers, and students can describe their respective responsibilities in delivering and receiving training.

Strategy:

➢ Interview staff and review the CCDP. Are all center areas involved in implementing WBL principles? At what point(s) are students assigned to WBL?

➢ Check with a few off-center and on-center WBL supervisors. What is the employer feedback on student skill levels, behavior, attitude, and readiness for work?

➢ Review employer partnership agreements. Do they represent a variety of employers? Speak with a few employers. Are WBL opportunities regularly used by the center? Have any of the employers hired Job Corps graduates?

➢ Determine how center-based WBL assignments are structured, including training agreements with supervisors; job descriptions; and linkages with CTT instructors (focus on TARs and academic course competencies).

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Rationale for Rating:

Q2. Students demonstrate familiarity with the terminology, technology, and behavioral expectations of workplaces.

Strategy:

➢ Determine how the center involves local employers or community resources to help convey employment expectations to students.

➢ Meet with the WBL coordinator and discuss industry trends as viewed by the students in the workplace. Review the career technical curricula. Does instructional content support the
development of skills necessary for success in the workplace? How has feedback from employers been used in structuring and/or selecting curricula?

- Interview the Academic Manager. Ask what systems are in place to ensure students participate in academic activities that develop and allow practice of employability and interviewing skills?

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Rationale for Rating:

Q3. Students practice skills acquired on center and learn new skills at the work sites to which they are assigned.

Strategy:

- Interview a few local employers. How are they participating with the center (serving as WBL sites, collaborating in curriculum development, providing other training opportunities for students, etc.)? What is their view of Job Corps students they encounter?

- Interview the CTST Coordinator. What CTST projects have been completed or are planned in the community?

- Interview students. What additional skills did they learn at the work site? How do they think their WBL experiences will help them in their careers?

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Rationale for Rating:

August 6, 2013
PRH 3.8 - Summary Rating

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3.9 **READING**

**PURPOSE**

P1. To provide students with the reading skills needed for employment in their chosen career fields and to function independently in society.

**REQUIREMENTS**

**R1. Required Instruction**

Centers shall provide instruction in the following reading competencies:

a. Initial skills
   1. Letters of the alphabet
   2. Vowel sounds
   3. Letter sound associations for consonants
   4. Consonant-vowel-consonant-silent-e pattern
   5. Sounds of diphthongs and other vowel combinations
   6. Number words: zero through ten
   7. Digraphs and other blends
   8. Compound words
   9. Irregular verbs
  10. Forming plurals
  11. Sounds of silent letter combinations
  12. Sounds of vowels with r
  13. Adding endings to y words
  14. Forming possessive nouns
  15. Syllabification patterns
  16. Prefixes and suffixes
  17. Accent marks

b. Interpret graphic information
   1. Signs
   2. Schedules
   3. Dictionary usage
   4. Index
   5. Reference sources
   6. Card catalog display
3.9-2 PAG Chapter 3: Career Development Period

7. Maps
8. Graphs
9. Forms
10. Consumer materials

c. Words in context
1. Same meaning
2. Opposite meaning
3. Appropriate word

d. Recall information
1. Details
2. Sequence
3. Stated concepts

e. Construct Meaning
1. Character aspects
2. Main idea
3. Summary/paraphrase
4. Cause/effect
5. Compare/contrast
6. Conclusion
7. Supporting evidence

f. Evaluate/Extend Meaning
1. Facts and opinions
2. Predict outcomes
3. Apply passage element
4. Generalizations
5. Author purpose
6. Point of view
7. Style techniques
8. Genre

Strategy:

➢ Visit and observe reading classrooms. Do instructors follow the curriculum? Are students actively engaged? Is the instructor engaged with the students? Is there evidence

August 6, 2013
of peer collaboration? Are there technical materials available? What instructional strategies are being used to cover required content? Are different learning styles and skill levels addressed?

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Rationale for Rating:

R2. **Placement in Reading Instruction**

Centers shall test all students at the beginning of their enrollment in Job Corps and provide them with reading instruction if they test below 567 on the Reading subtest of the Tests of Adult Basic Education (TABE) 9/10. Students will continue to receive reading instruction as a part of their overall academic and career technical training programs, and will not be exempt from follow-up TABE testing until they achieve the required reading score of 567 or greater on the TABE level M or D 9/10. Exceptions that apply to students with cognitive disabilities, and specific requirements for TABE test administration, are outlined in Appendices 301 and 305. Centers and operators will have the flexibility to determine where targeted training in reading will take place—in separate reading courses, HSE classes, high school courses, or applied academic skills training in career technical skills programs. Centers will also have the flexibility to determine students’ reading scores for placement in these courses and programs. In Puerto Rico centers, students will receive reading instruction, and will not be exempt from follow-up TABE testing, if they test below 760 on the TABE Español. (Initial Test Level – E-M; follow-up – Level M.) Students who score 552 or below on the initial TABE (751 on TABE Español) are the pool for tracking learning gains as outlined in Chapter 5, Appendix 501a. TABE scores for placements of students in English as a Second Language class are specified in “Initial Testing: All Students” in Appendix 301.

Strategy:

- Review TABE follow-up reports from CIS. Draw a sample of students. Is follow-up testing occurring during the required time frame?
- Ask the Academic Manager for a copy of the center guidelines/criteria for assigning students to a reading class. What are the center’s reading exit qualifications?
R3. Reporting/Documentation/Recordkeeping

Centers shall ensure that all students’ test results and progress are documented and recorded using the automated Student Testing System (STS) of the Center Information System (CIS). Centers must also document student academic progress as described in the center’s CDSS Plan (referred to in Section 3.1, Center Plan, R1).

Strategy:

- Interview reading instructors. How do they monitor student progress? Do they maintain classroom records on student progress other than the TABE records in CIS?
- Interview the records supervisor. When are TABE scoring sheets turned over by the testing coordinator? Review a sample of student permanent records to see if test tickets are appropriately signed and filed.

QUALITY INDICATOR(S)

Q1. Students can read and understand written technical and safety materials associated with entry-level employment in their chosen career fields.

Strategy:
➢ Observe and interview students and instructors. Do instructors use newspapers, applications, and other workplace materials in their classrooms and shops?

➢ See if there are computers for student use. Ask students for what purposes they use the classroom computers. Are there computer-based or Web-based resources being used?

➢ Interview students. Do they know what they need to accomplish to complete the class? Are they aware of the reading requirements in their chosen career field?

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Rationale for Rating:

Q2. Students can read and understand local newspaper articles, employment applications, and similar items of basic employment literacy.

➢ Determine if the center culture supports leisure-time reading? Do you see reading materials in the dorms, in the cafeteria, and health office? Is there a center library?

➢ Ask career technical training instructors if students assigned to their classes understand and can apply the reading skills necessary for success in their chosen trade. If they cannot, ask how the career technical training instructor is involved in addressing the problem.

➢ Are career technical training instructors collaborating with academic instructors on curriculum? Visiting applied reading classes? Exchanging trade-related materials to support instruction related to trade requirements? Participating in classroom projects that encourage learning and applying reading skills to trade requirements? Other?
PRH 3.9 - Summary Rating

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Rationale for Rating:
3.10 MATHEMATICS

PURPOSE

P1. To provide students with the mathematics skills needed for employment in their chosen career fields and to function independently in society.

REQUIREMENTS

R1. Required Instruction

Centers shall provide instruction in the following mathematics competencies:

a. Addition, subtraction, multiplication, and division of whole numbers
b. Addition, subtraction, multiplication, and division of decimals
c. Addition, subtraction, multiplication, and division of fractions
d. Percent and proportion
e. Linear, square, and volume measurement
f. Pre-algebra
g. Simple plane geometry
h. Consumer mathematics, to include, at a minimum, the following subject areas:
   1. Understanding paycheck information and income taxes
   2. Managing money
   3. Banking
   4. Becoming a wise consumer
i. Workplace mathematics related to the student’s specific career field.

Strategy:

➢ Pre-onsite: Review the education reports and determine the center’s attainment rate for math learning gains. Is the center meeting its goals?

➢ Speak with the Academic Manager. Request a copy of the mathematics curriculum. Are required competencies supported by the curriculum? Ask how instructors are involved in curriculum selection and development.

➢ Interview math instructors. Do they collaborate with and get feedback from CT instructors on students’ math skills?

➢ Visit math classrooms. Do instructors follow the curriculum? Are students actively engaged? Is there evidence of peer collaboration? Are there technical materials available? What instructional strategies are being used to cover required content? Are different learning styles and skill levels addressed?

August 6, 2013
R2. Placement in Mathematics Instruction

Centers shall test all students at the beginning of their enrollment in Job Corps and provide them with instruction in mathematics if they test below 566 on the math component of the Tests of Adult Basic Education (TABE) 9/10. Students will receive math instruction as a part of their overall academic and career technical skills training programs, and will not be exempt from follow-up TABE testing until they achieve the required TABE score of 566. Exceptions that apply for students with cognitive disabilities and specific requirements for TABE test administration are outlined in Appendices 301 and 305. Centers will have the flexibility to determine where targeted training in math will take place—in separate math courses, HSE classes, high school courses, or applied academic skills training in career technical skills programs. Centers will also have the flexibility to determine students’ reading scores needed for placement in these courses and programs. In Puerto Rico centers, students will receive math instruction if they test below 777 on the TABE Español. (Initial Test Level – E-M; follow-up – Level M.) Students who score 551 or below on the initial TABE math subtest (764 on the TABE Español) are in the pool for tracking learning gains as outlined in Chapter 5, Appendix 501a.

Strategy:

- Review TABE follow-up reports from CIS. Are students generally current in their testing schedules? Is follow-up testing occurring during the required time frame? Are they compliant with policy and guidelines?

- Ask the Academic Manager for a copy of the center guidelines/criteria for assigning students in a math class. What are the center’s math entry/exit qualifications?

- Interview math instructors. What assessments are used to determine student in-class math placement? How do they determine when a student has completed the class? Under what conditions do they send students for early testing? What feedback do they provide students regarding the results of their math TABE?
R3. **Reporting/Documentation/Recordkeeping**

Centers shall ensure that all student test results and progress are documented and recorded using the automated Student Testing System (STS) of the Center Information System (CIS). Centers must also document student academic progress as described in the center’s CDSS Plan (referred to in Section 3.1, Center Plan, R1).

**Strategy:**

- Interview math instructors. How do they monitor student progress? Do they maintain classroom records on student progress other than the TABE records in CIS?
- Interview the records supervisor. When are TABE scoring sheets turned over by the testing coordinator? Review a sample of student permanent records to see if test tickets are appropriately signed and filed.
QUALITY INDICATOR(S)

Q1. Students demonstrate the mathematics skills necessary for entry-level employment in their chosen career fields.

Strategy:

- Observe math classrooms. Do instructors encourage students to solve problems for themselves rather than asking others for information? Do students engage in discussions? Are work-related problems and examples used to help students master skills?
- Look at a sample of the math materials available. Are there materials related to career technical programs (e.g., instruction manuals, safety instructions, other workplace materials)?
- See if there are computers for student use. Ask students for what purposes they use the classroom computers. Are computer-based or Web-based resources being used?
- Interview students. Do they know what they need to accomplish to complete the class? Are they aware of the math requirements in their chosen career field?

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Rationale for Rating:

Q2. Students can perform the basic mathematical competencies required in everyday life.

Strategy:

- Observe math classrooms and interview students and instructors. Are workplace materials (e.g., pay stubs, benefit forms) used in the classrooms? Are practical math applications emphasized (e.g., budgets, interest rates, discounts)?
- Ask CTT instructors if students assigned to their classes understand and can apply the mathematical skills necessary for success in their chosen trade.
Does the center culture support after-training-day activities that promote the use of math skills? Are there materials in the dorms and recreational areas that promote logical reasoning (e.g., puzzles, games)?

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Rationale for Rating:
3.11 HIGH SCHOOL DIPLOMA AND HIGH SCHOOL EQUIVALENCY CERTIFICATE

PURPOSE

P1. To provide students with opportunities to obtain High School Diplomas (HSD) and/or pass the examination for the High School Equivalency (HSE) certificate.

REQUIREMENTS

R1. High School Diploma

Centers must make every effort to assist students in obtaining their high school diplomas, where feasible, during their enrollment.

Centers must implement a program to support student attainment of high school diplomas. At a minimum:

a. The program shall be accredited by the state department of education in the state where the program is located, or the General Council of Education of the Commonwealth of Puerto Rico, or a recognized accrediting body, if the state defers to a regional accreditation process. Acceptable accrediting bodies are listed in Appendix 304.

b. Centers must also ensure that all high school programs provided to students are recognized as public, private, charter, special purpose or other high schools by the states in which the programs are located.

c. The center shall not require students to pay any high school program fees. In addition, if students are required to supplement high school diplomas with additional courses for acceptance into branches of the military, centers must provide courses to students at no cost to the student.

d. Centers that are degree-conferring high schools, Local Education Agencies (LEA), and/or receive funds from the U.S. Department of Education must assess students with disabilities who may be in need of special education services, and provide those services accordingly. Centers that meet these criteria shall confirm with an appropriate local, state, or federal education agency official that its high school program is in compliance with Section 504 of the Rehabilitation Act of 1973 and/or the Individuals with Disabilities Education Improvement Act of 2004 (IDEA). The process for assessing students and providing special education services to those students with disabilities must be documented in the center plan (see Section 3.1).

Strategy:

- Pre-onsite: Review the education reports and determine the center’s HSD attainment rate. Is the center meeting its goals? Determine if the center is in a state in which a student who obtains a HSE automatically receives an HSD. If yes, what percentage of HSDs is obtained from passing the HSE test?

- Interview the Academic Manager. Does the center offer an HSD program? Determine the type of program offered (partnership, charter school, online, etc.). What accreditation does
the program have? Is it compliant with the guidelines set in PRH Appendix 304? Does the
center have a Memorandum of Understanding (MOU), approved by the Regional Office, for
partnerships/ concurrent enrollment agreements?

➢ Ask the Academic Manager what criteria and guidelines are used in assigning students to the
HSD program. How and when are these communicated with the students? Are these
consistent with what is documented in the CCDP?

➢ Observe high school classrooms. Are students provided with innovative or supplementary
activities to support their academic achievement (for example, computer labs, or tutoring)?
What is the student-to-teacher ratio? How large is the class? Are there lesson plans in
place that are aligned with the required high school content?

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Rationale for Rating:

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**R2. High School Equivalency (HSE) Preparation and Testing**

Centers shall implement programs to support student attainment of HSE certification as
required by the states in which the centers are located or where students are sent for HSE
testing. At a minimum, centers shall:

a. Provide instruction in content areas necessary for students to pass state-designated high
school equivalency assessments and achieve state high school equivalency certification.

b. Establish linkages with local HSE test sites to provide regularly scheduled testing dates.
A center that cannot access local testing sites may submit a request to its Regional Office
to obtain permission to apply to the appropriate state department overseeing HSE testing
for approval to become a local testing site.

c. Ensure high school equivalency tests taken at test sites on the center be administered by a
third party test administrator from a local educational or community institution (for
example, community college or local school district). High school equivalency tests shall
not be given by an employee of the Job Corps Center.

d. Pay all fees associated with student HSE testing.

---
Strategy:

- Pre-onsite: Review the education reports and determine the center’s attainment rates for HSE. Is the center meeting its goals?

- Ask the Academic Manager what criteria and guidelines are used in assigning students to the HSD program. How and when are these communicated with the students?

- Interview the HSE instructor. What curriculum is being used for HSE preparation? Who administers the Official Practice Tests? What determines when a student is ready for an Official Practice Test or the actual HSE test?

- Visit and observe the HSE classrooms. Do instructors follow the curriculum? Are students actively engaged? Is the instructor engaged with the students? Is there evidence of peer collaboration? Are technical materials available? What instructional strategies are being used to cover required content? Are different learning styles and skill levels addressed? Are students provided with innovative or supplementary activities to support their academic achievement (for example, computer labs, or tutoring)? What is the student to teacher ratio? How large is the class? Are there lesson plans in place that are aligned with the required HSE content?

- Interview the Academic Manager. Does the center have an agreement with a HSE testing site? Is testing available on center? Are the testing schedule and number of testing slots sufficient to meet center needs? If testing is conducted on center are the tests administered by a third party administrator from a local educational or community institution (such as a community college or local school district)? If not, this is in violation of the PRH -- how is this being resolved?

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Rationale for Rating:

**R3. Concurrent HSD/HSE Programs**

Centers are encouraged to develop concurrent HSD/HSE opportunities through local or public educational agencies, private educational agencies, or online/virtual learning.
programs, whenever such entities provide education and training substantially equivalent in cost and quality to that which the center could provide.

Concurrent HSD/HSE arrangements must be approved by the Regional Director and formalized by a MOU or contract. At a minimum, HSD/HSE MOUs or contracts shall include:

a. Job Corps program eligibility of all participants;

b. Name and location of the HSD/HSE provider;

c. Description of how services will be delivered and coordinated through the student’s Career Development Period (CDP);

d. Methods for determining student enrollment, progress, and completion in the concurrent HSD/HSE program;

e. Accrediting body certifying attainment of the HSD or HSE;

f. All associated costs to the center; and

g. Nondiscrimination clauses and commitments to adhere to all applicable state and federal laws with regard to students with disabilities (e.g., IDEA, Section 504 of the Rehabilitation Act, ADA, etc.).

Every effort should be made to reduce class size in approved HSD/HSE programs. However, concurrent arrangements must ensure that both programs are not paying for the same services. Center operating budgets/staffing must be adjusted to account for services provided by other concurrent enrollment institutions.

Strategy:

➢ Interview the Academic Manager. Does the center have a concurrent enrollment program? Is there an MOU approved by the Regional Office? Ask to see a copy.

➢ Conduct a random sample of student files for students enrolled in the concurrent OCT and ACT programs to ensure that students meet program eligibility requirements.

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Rationale for Rating:
R4. Reporting/Documentation/Recordkeeping

Centers shall record information on students’ HSE and high school diploma achievement while on center in the Center Information System (CIS), and maintain the appropriate supporting documentation in the students’ permanent Job Corps files.

c. HSD/HSE Completion Reporting

1. The HSE completion date recorded in CIS will be the date on the student’s HSE certificate, if available. If the HSE certificate cannot be obtained prior to a student’s separation, the center can enter the date of the student’s last HSE test on the official notification from the HSE testing center indicating the student has passed the HSE test.

2. The official high school diploma completion date recorded in CIS will be the date on a student’s diploma. If the high school diploma is not available at the time of a student’s separation, the center can enter either: the date of the official letter from the diploma-granting institution indicating the student has met all the requirements for graduation and will be issued a diploma at a later date; or the date on the student’s official high school transcripts indicating graduation.

b. HSD/HSE Final Documentation

1. Copies of the HSE certificates or official HSE scores shall be included in students’ permanent files.

2. Copies of high school diplomas students earned while on center, final high school transcripts, and supporting documentation on special education services, as applicable for students with documented disabilities, shall be included in students’ permanent files.

c. HSD/HSE Progress Reporting and Documentation

1. Copies of students’ HSE practice test results (paper answer sheets, or reports generated by official practice test software, or TMS reports) will be maintained by centers required by the states in which they are located to show documentation of official practice test results prior to students taking HSE exams.

2. Centers shall record students’ test scores in each HSE content area in CIS, as written confirmation is received from the testing center. Scores recorded in CIS shall be updated to record higher test scores that students may obtain in retests, as needed, in each content area.

3. Students’ progress in their HSE and high school diploma programs must be documented in the students’ personal career development plan.

August 6, 2013
Strategy:

- Select a sample of students who have attained their HSD and/or HSE. Review their records in CIS to see if completion data has been entered. Review permanent student folders to see if documentation is included in the students’ permanent files. Terminated folders should be reviewed as part of the targeted audit.

- Interview the HSE instructors. How are HSE test scores communicated with the center? Who enters the test scores into CIS? Are both passing and failing scores entered into the system? When? Check the students’ PCDPs to see if HSD/HSE progress is reflected.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students who enroll in Job Corps without a high school diploma or HSE certificate, separate from the program with a high school diploma or HSE certificate.

Strategy:

- Interview the Academic Manager and ask about the center’s relationships with local schools. What linkages exist with the local school district, community colleges, and/or community-based training providers that assist students in attaining their academic credentials?

- Interview local educators. Do they view Job Corps as an education partner in their community? What specific agreements exist to support student achievement, collaboration, and resource sharing?

- Interview students. Are they aware of their progress toward a high school diploma or HSE?

- Review the HSE testing schedule. Are there regular and frequent opportunities available for students to take the HSE test?

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August 6, 2013
Rationale for Rating:

Q2. Concurrent HSD/HSE agreements are compliant, suitable, appropriate, and cost-effective to meet program needs.

Strategy:

- Review the HSD/HSE agreements and determine their appropriateness in meeting student needs. Are the agreements compliant and cost-effective?

PRH 3.11 - Summary Rating

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3.12 ENGLISH AS A SECOND LANGUAGE (ESL)

PURPOSE

P1. To provide English Language Learner (ELL) students with the opportunity to develop English language and acculturation skills so that they can successfully achieve their career goals.

P2. To improve ELL students’ opportunities for employment through improved English language communication skills.

REQUIREMENTS

R1. Center Requirements

Centers shall:

a. Develop strategies to meet the unique needs of ELL students in all phases of the Career Development Services System (CDSS).

b. Use vocational ESL (VESL) techniques to ensure the regular collaboration of ESL instructors and career technical training instructors to develop strategies for working with ELL students in career technical training shops and classrooms.

c. Assign an ELL coordinator to oversee and monitor programs and services for ELL students.

Strategy:

- Interview the ELL coordinator. What programs and services are available to ELL students during CPP? During CDP? How are staff from various departments involved?

- Ask to see the center’s ELL Readiness Plan. Is it part of the Center Plan? Does the center have an integrated and functional career technical English as a Second Language (VESL) curriculum?

- Check class scheduling and training records of ELL students to determine what they have completed and what they are taking now. Are ELL students involved in WBL?

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Rationale for Rating:

August 6, 2013
R2. **English Language Skills**

Each center shall develop the capability, and describe that capability in its Career Development Plan (see Section 3.1), to provide instruction and training to ELL students aimed at enabling the students to demonstrate the following skills in English:

a. Ask and respond to questions on both familiar and unfamiliar topics
b. Communicate effectively in routine social and work situations
c. Pronounce words clearly and understandably
d. Apply basic grammar
e. Understand conversation at a reasonable speed
f. Understand and accurately relay telephone messages
g. Follow basic oral instructions
h. Read and understand material on familiar topics
i. Perform the reading competencies listed in Section 3.9, Reading
j. Perform the communication competencies listed in Section 3.7, R1.f, Communications

Strategy:

- Ask for copy of the curriculum. Is the curriculum appropriate for different levels of ESL? Does it include reading, writing, listening, and verbal communication competencies?

- Interview the ESL instructor. What formal and informal assessments are used for in-class placement? How is student progress measured and monitored? What benchmarks are used for moving students from one level of ESL to the next? Does the center have specific criteria or guidelines for determining when a student completes ESL class?

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Rationale for Rating: August 6, 2013
R3. **Special Support for ELL Students**

All Job Corps centers shall provide special emphasis on, and support for, ELL students in learning, practicing, and developing competencies in all eight Career Success Standards (Section 3.7, Career Success Standards). At a minimum, special support shall include:

- The tailoring of lessons and activities to meet the special needs of ELL students.
- The use of supplementary learning materials.
- Opportunities to role-play and otherwise practice speaking and writing skills related to CSS.
- The teaching of safety, tool, machine, and other workplace vocabulary to facilitate the full involvement of ELL students in career technical training as early in career development as possible.

**Strategy:**

- Observe the ESL classes. What instructional strategies are being used? Are they appropriate in meeting the needs of ELL students? Is there a variety of materials appropriate for different skill levels? Are students engaged in classroom activities?

- Check to see if career-related materials are available. Is content delivered in the context of CTT or a workplace?

- Interview the social development director or manager. Are students exposed to experiences that develop independent living skills (e.g., field trips to banks, stores, etc.) and cultural awareness of the United States? Are there activities and materials that promote English language skills development after training hours?

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**Rationale for Rating:**

R4. **Reporting/Documentation/Recordkeeping**

Centers shall ensure that a student’s test results and progress are documented and recorded on the student’s Personal Career Development Plan (PCDP) and other applicable modules of the automated Center Information System (CIS).

August 6, 2013
Strategy:

- Review a sample of ELL student profiles in CIS to see if appropriate information/data has been entered into applicable modules.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. ELL students participate fully in all career development services throughout enrollment.

Strategy:

- Review the center’s ELL Readiness Plan. Is it comprehensive? Is it being implemented?

- Conduct a focus group. Are ESL students satisfied with the training and services they are receiving? Do they feel welcome to participate in center activities? Do they get the assistance they need if there is something they do not understand? Who provides the help? What concerns or suggestions do they have?

- Interview ESL teachers. What special strategies and activities does the center use to instruct ESL students? How do ESL teachers collaborate with career technical instructors and other center staff? When are ESL students transitioned into regular academic and CTT classes? Who determines student readiness? How?

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Rationale for Rating:

August 6, 2013
Q2. ELL students who are nearing graduation demonstrate the language, thinking, and interpersonal skills necessary to apply for jobs, access information, use workplace systems and technologies, and interact successfully with supervisors, co-workers, and customers in workplace settings.

Strategy:

- Interview ELL students nearing graduation. Evaluate their language, interpersonal, and workplace readiness skills.
- Interview ELL students. What center activities do they participate in? Can they tell you what employability skills are? Are they aware of the PCDP? Ask to see a PCDP and ask a student to explain it to you.

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3.13 CAREER TECHNICAL TRAINING

PURPOSE
P1. To provide students with career technical knowledge and skills that meet industry standards, leading to high-demand, high-growth pathways and, where available, industry certification.

REQUIREMENTS

R1. Approved Programs
Centers shall offer career technical training approved by the National Director of Job Corps.

Strategy:

➢ Review the CTTRC for career technical offerings and compare with the center’s current offerings. Do slot allocations match? If not, ask the CTT manager why. Is there regional approval for changes?

➢ Ask to see the TARs being used in the career technical classes. Are these approved national TARs or NTC TARs?

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Rationale for Rating:

R2. Required Instruction
Centers shall:

a. Provide instruction in the competencies listed on official Job Corps Training Achievement Records (TAR) of the career technical training programs approved for the center. These TARs may be either paper or electronic. Where training is offered through external providers such as accredited educational institutions utilizing Off-Center Training (OCT) programs, centers will use the CIS3G e-TAR for coding purposes only. Centers that have approved OCT programs must input final student accomplishments using the OCT e-TAR code in the CIS3G e-TAR using the Summary, Detail, and Credential Tab. However, all OCT programs
must be endorsed by the Regional Office and recommended for final review and approval by the Office of Job Corps, to ensure that they are comparable to or exceed the rigor and relevance of national training programs. OCT programs must provide one or more of the following: a certificate of completion; a degree certificate; or an industry credential (See R6b. and c.).

b. Provide instruction in additional competencies (beyond those listed on officially approved TARs) as necessary to equip students with the skills required in specific labor markets. Centers shall not delete competencies from TARs without the approval of the National Director.

c. Provide instruction related to safety in all career technical training programs.

d. Credit students with acquisition of skills only after they have demonstrated competency in the skills at the level indicated on the approved TARs. When work sites are used to develop skills, employers shall be involved in assessing student competency.

e. Develop work-based learning opportunities that are related to the career technical training program in which the student is enrolled and are appropriate to the student’s level of achievement, and where applicable, assist the student in meeting requirements of industry certifications.

f. Centers will make every effort to provide an opportunity for all students to obtain their basic driver’s license prior to graduation. Addressing driver’s license requirements on TARS specifically, attainment of a basic and/or commercial driver’s license (CDL) may be required as part of a specific program where vehicle operation is a critical component of employment.

Strategy:

- Interview the Career Technical Training Manager. Who determines how instruction will be delivered in the different career technical training areas? Is there a documented plan on what activities support TAR items? Is there a variety of activities to support different skill levels?

- Interview the career technical instructors. How is instruction delivered to address TAR items for their particular training areas?

- Interview the WBL coordinator. What type of WBL activities are available to students? Who determines student readiness for WBL assignments and how is the determination made? Do employers provide feedback on student performance and other related matters? How are career technical instructors informed? How are they involved in establishing and maintaining employer relations?

August 6, 2013
R3. **Employer Involvement**

Centers shall utilize input from their Industry Councils, and other sources such as employers and apprenticeship committees/councils, in determining the content of their training programs, and shall adjust and supplement center training programs to meet industry needs.

Strategy:

- Interview career technical instructors. Do they solicit feedback from employers and industry councils on TAR items? Are they conversant about the local and regional labor markets for their particular areas? How do they keep up to date on developments in particular industries?

R4. **Job Shadowing**

Centers shall develop job-shadowing opportunities for students that reflect occupations matching current center offerings or provide students with experiences in new and emerging occupations. Using relationships developed with local and national businesses, centers shall coordinate opportunities for students to shadow employees at work sites in careers that are related to their career skills training, as well as careers that students are interested in exploring. These opportunities provide students with an understanding of the workplace, a chance to explore new careers, and an opportunity to apply their training.

August 6, 2013
Strategy:

- Interview the CTT Manager. What job shadowing opportunities are available to students? How long are students involved in job shadowing? Who is responsible for assigning and monitoring student participation?

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Rationale for Rating:

**R5. Relations With National Training Contractors**

Relations between center management and National Training contractor (NTC) instructors shall be governed by the Memorandum of Understanding (MOU) signed by each NTC and the involved center. A copy of this MOU is included for reference in Appendix 302 (MOU between the NTC and center contractor).

Strategy:

- Ask to see applicable MOUs. Are they current and signed?

- If possible, NTC representative(s) should be available to discuss how they support the program. If not, ask the career technical instructor how the NTC supports him or her. If there are any issues or concerns about a program, who is responsible for resolutions? Are there clear protocols designating with whom the NTC instructors should coordinate on center?

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Rationale for Rating:

August 6, 2013
R6. **Advanced Training (AT) Programs**

The National Office has approved a variety of advanced training (AT) programs at certain Job Corps centers. Students enrolled in AT programs have the opportunity to extend their enrollment up to one full year beyond the current two-year enrollment limitation.

a. **Eligibility**

All students who are placed into an approved AT program must meet the AT program’s specific eligibility requirements. At a minimum, AT applicants shall meet the following entry criteria:

1. Must have completed an approved prerequisite career technical training program and achieved all applicable certification requirements.
2. Must hold a high school diploma or have obtained a HSE certificate.
3. Must demonstrate the academic proficiency needed to succeed, as defined by the specific AT program.
4. Must receive a written recommendation from the sending center and documented acceptance from the receiving center.

b. **Advanced Training (AT) Centers**

1. To be designated an AT program, the training offered must clearly show that students will develop higher and more complex skills and competencies than those covered by the basic program. In addition, a center must either (1) articulate an agreement with a postsecondary educational institution for students to receive college credit while enrolled in the AT program; or (2) be supported by industry-specific partnerships. Requests for AT designation should be submitted to the Regional Office for initial evaluation and endorsement prior to being forwarded to the National Office, which will make the final determination of whether the proposed training program meets the criteria for AT designation.
2. The operator shall develop outreach strategies to include enrollment, eligibility, and completion requirements to achieve and maintain the AT program’s design capacity.
3. The operator must provide reasonable accommodation needs of students with disabilities, as appropriate.
4. Regional and National Office staff will monitor performance of approved AT programs through the Career Technical Training Report Card (CTTRC), as outlined in Appendix 501d.

c. **Transfer Credits**

Centers that transfer eligible students to an approved AT program at another center will receive a school placement credit at the time of transfer. The sending center will also be credited for any program measure that the student qualifies for,
and has earned. When a student separates from an AT program and is placed, both the sending center and the AT center will receive all credits related to placement accomplishments, as outlined in Appendix 501. Centers offering the prerequisite basic program and the AT program will receive all credits due at the time of student final separation.

d. Sending Centers

1. Sending centers will promote AT programs as an option for students throughout their enrollment.

2. The sending center will collaborate with the AT center to effect the transfer of eligible students, as outlined in Chapter 6, Section 6.4, R2.

Strategy:

➢ Interview the Career Technical Manager. Does the center promote AT programs? How do staff inform students about the programs and encourage them to participate? What assistance is provided to students who are interested in AT programs at other centers? How are students selected and recommended for AT programs?

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Rationale for Rating:

R7. Reporting/Documentation/Recordkeeping

a. Centers shall ensure that all student test results and progress are documented on approved TARs including credential attainment results (see R6.b. and c.). Career Technical Training instructors record skill proficiency by rating the appropriate skills area on the e-TAR. This action represents how an instructor gives credit to the student for skill attainment. The date does not necessarily indicate when the student completed the task. The date indicates the instructor’s assertion of skill proficiency, documenting that the student is able to perform the task to industry standards with little or no supervision. For the instructor to perform the data entry process student does not need to be present for duty.

b. Students will use the Student Portal to access their e-TAR and check off the student acknowledgement box. This allows the student to stay informed of
his/her progress. This is for information only. This does not impact the completion status or closing out of the e-TAR.

Strategy:

- Review a sample of student CIS profiles to ensure compliance. Use samples of active and separated student files and validate against progress reported in CIS.
- Introduce career technical instructors. What criteria are used for signing off TAR items? Is there a process for discussing student progress and assessing skills level before a sign-off? How is progress documented if a sign-off is not yet warranted? Check a sample of TARs and check the dates of sign-offs. Do they support the information shared by the instructor?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students demonstrate competency in the skills indicated and documented on their training records.

Strategy:

- Pre-onsite: Review CTTRC reports.
- Review a sample of student TARs.
- Check certification data. What percentage of eligible students pass state certification tests and licensure exams (e.g., CNA, AWS)?
- Ask instructional staff how project-based and work-based learning are used in the program to provide students with quality training in a wide range of required skills.
- Examine the CTST plan and verify that there is a wide range of projects involving many different skills rather than repetitive task assignments (e.g., mock-up work).

August 6, 2013
Observe projects in progress to determine the level of skills required to accomplish them and the quality of work produced. Are local contractors ever invited to the CTST site to see the students at work and provide feedback? Are students actively working or are they standing around waiting for directions?

Randomly select TARs. Review skills that have been signed off by the students and their instructors. Ask selected students from each CTT area to demonstrate skills that have been documented as completed in their TARs.

Conduct interviews in the CTT classroom and ask students to describe shop procedures signed off in their TARs.

Review specific TAR items included in the training plans for WBL sites. Meet with WBL students and ask them to describe skills that were signed off on their TARs during their WBL experience. Review student evaluations from the employer(s). Were these appropriately reflected in the TARs or PCDPs?

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Rationale for Rating:

Q2. The curricula of the career technical training programs at the center reflect current industry practices.

Strategy:

- Interview the Center Director. Ask how the Industry Council, advisory boards, or other business/industry representatives are involved in curriculum reviews and in formulating strategies for programs to meet industry standards.

- Check with the Industry Council. Have they compared TAR skills with current industry standards? Have they toured the shops, seen the equipment, and talked with students? Does the council recommend upgrades for trades when necessary?

- Interview the Career Technical Manager. What industry-recognized certifications are offered to students for each career technical training program? How are business and industry representatives involved in the identification and selection of certifications offered? What
percentage of students in each area are able to obtain career technical credentials (certifications, licensure, apprenticeship, etc.) prior to completion?

- Select a sample and contact employers from the center CDSS placement records. Ask if the students they hired demonstrate employability skills. Are their technical skills adequate to meet occupational standards? If not, which areas needed improvement? If the student is still working there, has she or he progressed in position, salary, or in other ways? Would the employer hire another Job Corps student? Why/why not?

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3.14 CONCURRENT TRAINING

P1. To broaden career technical training opportunities available to Job Corps students through linkages with external training providers.

REQUIREMENTS

R1. General

Job Corps students enrolled in and receiving supplemental services from one or more additional workforce development programs or other training institutions will be designated as concurrently enrolled. Concurrent enrollment arrangements must be approved by the National Office of Job Corps, with Regional Office endorsement, and formalized by a Memorandum of Understanding or contract. Such agreements must include language that describes how each of the following requirements will be met.

a. Students must complete all Career Preparation Period requirements, including health services.

b. All students must receive the full range of Job Corps services, including career development and personal face-to-face counseling. Evaluations of Student Progress (ESPs) and Personal Career Development Plan (PCDP) updates will be accomplished in the same manner as for other students.

c. Provisions must be made to ensure that concurrently enrolled students receive the full benefit of academic, employability, and social skills training.

d. Student breaks and holidays provided by other service providers must not result in concurrently enrolled students having more non-work days than other Job Corps students.

e. Provisions must be made to ensure that students are engaged in meaningful learning or enrichment activities during their downtime (e.g., non-class days/hours, semester breaks, etc.) from participating courses.

f. Determination for the provision of reasonable accommodation must be made for students with disabilities, as required and appropriate.

g. At a minimum, the center must receive, record, and maintain regular progress and attendance reports from concurrent enrollment institutions.

h. Provisions must be made to ensure that concurrently enrolled students receive career transition readiness services prior to graduation and career transition services after graduation.

i. Concurrent enrollment arrangements must ensure that both programs are not paying for the same services. Center operating budgets/staffing must be adjusted to account for services provided by other concurrent enrollment institutions.

j. Resources from federal student aid, such as Pell Grants and Stafford loans, can be applied to college credit, reduced credit, or non-credit remedial courses, in accordance with federal student financial aid guidelines. In addition, the courses must lead to a certificate of completion or an associate’s degree at accredited...
higher education institutions, and must be required by Advanced Career Training (ACT) programs approved by the National Office.

k. MOUs or contracts must be reviewed and approved annually by the Regional Offices. MOU/contract renewals will be due on the contract center’s anniversary or the start of each program year for Civilian Conservation Centers (CCCs).

l. A description of the approved concurrent enrollment programs must be included as part of the center’s Career Development Services System (CDSS) Plan. At a minimum, the narrative shall address:

1. The name and location of the service provider.
2. A description of the programs offered, O*NET codes, and approved slots.
4. A description of how the programs will be evaluated.

Strategy:

➢ Does the center have any concurrent career technical training programs? Are there assigned O*NET codes in CTTRC? Ask for a copy of the MOU. Does it have Regional Office approval? How are students notified of this program? How are they selected for the program?

➢ Interview the Career Technical Manager. Does the center have formal criteria and guidelines on how students become eligible and are selected for concurrent enrollment programs?

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Rationale for Rating:

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**R2. Off-Center Training (OCT) Programs**

Job Corps students enrolled in and receiving career technical training at an off-center training (OCT) location or other educational institution will be designated as OCT students.

a. Program Approval

1. OCT arrangements, including contracted slots designations, must be approved, in writing, by the Regional Director and formalized by a
Memorandum of Understanding (MOU) or contract between the center and the OCT provider confirming that the OCT program meets or exceeds the skill standards specified in Job Corps national TARs. Centers must verify if OCT providers’ completion and certification requirements are at least the same level as industry certification requirements and that they measure competency, not time in class. The Regional Office must include this as a criterion in evaluating and approving OCT programs.

Upon approval, the Regional Office must immediately submit a copy of the documented approval, contracted OCT slots, and MOU or contract to the National Office, Division of Educational Services. The National Office shall inform the Job Corps Data Center of changes to programs, slots, codes, and other relevant information that need to be incorporated into the Center Information System (CIS).

To ensure timely processing of program codes in CIS, the Regional Office must submit an OCT Program Code Request Form (Appendix 309) to the National Office, Attention: Division of Educational Services/Career Technical Training Team Leader. The National Office will inform the Job Corps Data Center of approved program codes and slots.

2. To ensure compliance with R2.a.1, the MOU must provide a description of the proposed training program(s), to include:

   (a) training in one of the identified 11 industry areas (see Exhibit 3-3);
   (b) incorporation of current industry standards and requirements;
   (c) requirements for student completion, and/or requirements for student certification attainment;
   (d) system for monitoring and documenting student progress; and
   (e) cost by training slot, as well as cost for equipment, supplies, and clothing.

b. General Requirements

Approved OCT programs shall:

1. Offer training at accredited institutions located within reasonable commuting distances of the center.
2. Offer students the opportunity to obtain career technical certification in their chosen field of study.
3. Align with the skill standards outlined in nationally developed and approved Training Achievement Records (TARs).
4. Provide reasonable accommodation for students with disabilities, as appropriate.

Centers shall not pursue OCT programs for which on-center programs already exist at that center. This does not preclude centers from pursuing OCT programs that offer specialized training that enhances current center offerings.
c. Entry Requirements

All OCT applicants shall meet the following entry criteria:

1. Must demonstrate the academic proficiency needed to succeed in the chosen OCT program.
2. Must meet entry requirements and adhere to regulations required by the training provider.
3. Written parental consent must be obtained for minors prior to participation in OCT programs.

d. Continued Enrollment

Once enrolled in an OCT program, to continue to participate, students must:

1. Carry enough credits and/or complete all coursework necessary to maintain adequate progress toward completion of a certification within the enrollment period.
2. Maintain “student in good standing” status throughout their enrollment in the OCT program.

Centers shall develop procedures for removal of students who do not meet the requirements of paragraphs 1 and 2 above.

e. OCT Completion Requirements

To complete OCT, students must receive a full professional or completion certificate equal to or exceeding the rigor of certifications outlined by corresponding national, on-center training programs, prior to separation from Job Corps.

f. Reporting/Documentation/Recordkeeping

Centers shall ensure that all student progress is documented and recorded using the Center Information System. Approved alternate and additional forms of documentation must be included in the student’s permanent records upon separation (as outlined in Exhibit 6-1).

Strategy:

➢ Determine if the center has any approved OCT programs. Are there assigned O*NET codes in the CTTRC? Ask for a copy of the MOU or contract. Does it have Regional Office approval?

➢ Select a sample of student files. Are copies of certificates obtained included in the files?
R3. Advanced Career Training (ACT) Programs

Job Corps students pursuing an associate’s degree at accredited higher education institutions will be designated as Advanced Career Training (ACT) students.

a. Program Approval

Regional Offices shall approve the establishment of ACT programs at Job Corps centers with contracted ACT slots designation. Programs must be approved by the Regional Director and formalized by a Memorandum of Understanding (MOU) or contract. Upon approval, the Regional Office must immediately submit a copy of the documented approval, contracted ACT slots, and MOU or contract to the National Office, Division of Educational Services. The National Office shall inform the Job Corps Data Center of changes to programs, slots, codes, and other relevant information that need to be incorporated into the Center Information System.

b. General Requirements

ACT-approved Job Corps centers shall:

1. Offer training at accredited postsecondary institutions located within reasonable commuting distances of the center.

2. Maintain total ACT enrollment at a single institution at a level not to exceed 5% of the institution’s total student population.

3. Ensure that the training offered to students is advanced beyond the skill levels taught in the basic career technical and academic programs at the center.

4. Ensure that ACT programs are aligned with on-center or OCT career technical programs to promote a student’s career development.

5. Develop a formal application and approval process to which all students have equal access, and utilize this process in selecting students for the ACT program. The application process must provide reasonable accommodation for students with disabilities, as appropriate.
6. Establish a system for regular monitoring of the performance of ACT students, via transcripts, attendance records, and other means (in accordance with Exhibit 6-1). This system should be documented in the center’s Career Development Plan (PRH Section 3.1).

7. Provide opportunities for ACT students to continue to participate in center life.

8. Allow students enrolled in ACT programs to extend their enrollment up to one full year beyond the current two-year enrollment limitation.

c. Entry Requirements

All ACT applicants shall meet the following entry criteria:

1. Must have completed an approved career technical training program.
2. Must hold a high school diploma or have obtained a HSE certificate.
3. Must qualify on college placement tests to be eligible for the ACT entry requirements of the accredited postsecondary institution.

d. Continued Enrollment

Once enrolled in an ACT program, to continue to participate, students must:

1. Carry enough credits to maintain full-time student status each quarter/semester.
2. Maintain “student in good standing” status throughout each quarter/semester.
3. Complete all course work and earn the associated number of credits each quarter/semester.

Centers shall develop procedures for removal of students who do not meet the requirements of items 1 through 3 above.

e. ACT Completion Requirements

To complete ACT, students must meet the following requirements:

1. Attend the ACT institution for three academic quarters or two semesters; AND
2. Attain or receive one or more of the following:
   (a) An industry certification, OR
   (b) A one-year certificate of completion, OR
   (c) An associate’s degree in an approved program.

f. Reporting/Documentation/Recordkeeping

Centers shall ensure that all student progress is documented and recorded using the Center Information System. Approved alternate and additional forms of documentation must be included in the student’s permanent records upon separation.
Strategy:

- Review existing relationships/partnerships with local colleges. What higher education linkages are present? What specific agreements exist to support collaboration and resource sharing?

- Determine if the center has an approved ACT program. Are there assigned O*NET codes in the CTTRC? Ask for a copy of the MOU or MOA. Does it have Regional Office approval? How many ACT slots are approved for the center? How many students are currently participating?

- Interview the ACT coordinator or staff overseeing the program. Does the center have documented criteria, guidelines, and procedures regarding ACT? How are students notified of the program? How are they selected for the program? How is eligibility determined?

- Ask to see a sample of student schedules. Are students enrolled for the minimum allowable credit hours? Are classes appropriate to their programs (e.g., no remedial courses)?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. ACT students demonstrate increased proficiency in career technical, academic, and social skills while at school, work, or on center.

Strategy:

- Review ACT student evaluations to determine whether they are progressing in their respective areas of training. How is feedback gathered from college instructors/professors? Are these reflected in performance evaluations? In PCDPs?

- Interview ACT students. Evaluate their job readiness skills. Can they articulate their goals for employment or further studies?
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3.15 INFORMATION TECHNOLOGY

PURPOSE

P1. To enable students to apply basic information technology (IT) to the development of their academic and career technical skills.

P2. To provide students with information technology skills needed for employment and job retention in their chosen fields, and to function effectively as lifelong learners.

REQUIREMENTS

R1. Applied Information Technology

Centers shall provide students with instruction in the application of basic information technology to the development of their academic and career technical skills. This will include:

a. Instruction in use of information technology applications relevant to their academic and career technical training.

b. Opportunities to practice and use information technology to learn academic and career technical skills.

Strategy:

➢ Determine if there is a formal class organized to deliver instruction in IT in CDP. Ask for a copy of the curriculum.

➢ Observe classroom and career technical skills training. How is technology used? Is technology isolated in computer classes and learning labs, or is there evidence of technology in the trades? In education? In recreation and dorms? In the career center? Do students have access to technology during leisure time or are the labs and classrooms locked up? Ask students if they have access to computers and, if so, what they use them for. Is software current and appropriate for workplace environments?

➢ Interview the manager responsible for the IT course. How is course effectiveness assessed? If the center does not have a formal IT class, how is required instruction delivered? How is effectiveness assessed?

➢ Visit the classroom. Are equipment and other resources adequate to support instruction? Are required topics taught? Speak with students and ask about what additional skills they have learned since taking the class. Do they feel that their IT skills have improved? Do they know the importance of IT skills in supporting their academic and career goals?
R2. Computer-Based Learning

Centers shall provide and use information technology to learn academic and career technical skills.

a. Access and use computer-based training modules
b. Locate and use online learning resources

Strategy:

- Interview the senior education administrator. Do students have access to computer-based and Web-based resources in all training areas? Is the amount and quality of equipment adequate? Are there minimum requirements for incorporating computer-based learning in every area?

R3. Word Processing

Centers shall provide students with instruction that will enable them to attain the following competencies:

a. Basic keyboarding
b. Use of word processing applications to create, edit, save, and print documents
c. Use of basic templates and formatting features to create business documents in standard formats and styles

d. Use of word processing utility tools including spell check, thesaurus, and grammar check

Strategy:

➢ Interview the senior education administrator. Who teaches these skills? Is a formal curriculum used? What instructional strategies and resources are used? Are all students scheduled for the same training or are students assigned based on skill levels? How are skill levels and competencies assessed?

➢ Interview students. Ask them to demonstrate some word processing skills. How are they able to use these skills to support their academic and career technical training? Did they have these skills prior to enrollment? Do they feel their skills have improved?

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Rationale for Rating:

R4. **Internet Proficiency**

Centers shall provide students with instruction in the use of the Internet to:

a. Use search engines

b. Conduct research to find directions, schedules, and resources

c. Communicate using e-mail

d. Access and use labor market information

Strategy:

➢ Interview the senior education administrator. Who teaches Internet skills? Is a formal curriculum used? What instructional strategies and resources are used?

➢ Observe students in academic and career technical classrooms. Are they using the Internet as part of class activities? Speak with students and ask if they know how to use search engines. Do they have e-mail accounts? What do they use them for? Does some of their classwork require the use of search engines and e-mail?

August 6, 2013
R5.  **Business Technology**

Centers shall provide students with instruction in the use of:

a. Copiers  
b. Fax machine  
c. Telephone  
d. Voice mail

Strategy:

- Interview the senior education administrator. Who teaches these skills? Is a formal curriculum used? What instructional strategies and resources are used?

R6.  **Business Etiquette**

Centers shall provide instruction to ensure that students understand:

a. Ethics of using employer business machines for personal use  
b. E-mail etiquette  
c. Appropriate use of the Internet in the workplace
Strategy:

- Interview students. Can they articulate what they know about business etiquette? Ask them how this applies to their classroom/shop areas and the workplace.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students demonstrate the ability to use computers to access and process information, including online learning opportunities.

Strategy:

- Observe the students using computers. What is their general comfort level? Can they navigate using Windows? Can they navigate the Web? Can they find sites? Can they use search engines effectively? Do they know how to access online learning applications (Web-based and Intranet-based, if applicable)? Can they use America’s Job Bank or other job search sites? How well do they use basic applications such as word processing, spreadsheets, and e-mail? Ask them if they have off-hour access to computers (evenings and weekends).

- Assess how technology is used to enhance student learning. Is technology a part of all instruction or only a few classes? Observe classrooms for technology use. Do all students have access to computers? What do students and instructors use computers for?

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Rationale for Rating:

August 6, 2013
Q2. Students can describe the relevance of information and business technology to their career goals.

Strategy:

- Interview students. Ask how they will use technology to find employment. Ask for a demonstration of their knowledge in accessing labor market information on the Internet. Can students show you job sites on the Internet related to their career technical training and/or career goals?

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3.16 RESIDENTIAL LIVING

PURPOSE

P1. To create and maintain an environment that allows students to learn and practice independent and community living skills.

P2. To model and reinforce social and employability skills, such as positive attitude, dependability, and teamwork.

P3. To provide a safe, secure, clean, and attractive physical and social living environment for students that is appropriate to their varied needs and levels of maturity.

REQUIREMENTS

R1. Student Self-Management Skills Development

Centers shall develop systems that involve students in the management of their living areas, which shall incorporate the following features:

a. Opportunities for all students to have input into the development of the center policies governing the management of their living areas

b. Procedures to solicit input from, disseminate information to, and obtain feedback from students

c. Student responsibility for maintaining cleanliness within their living areas

d. Progressive opportunities to learn, practice, and demonstrate personal responsibility and self-management skills

Strategy:

➢ Is there an independent living dorm? How are students selected for this dorm? Are there opportunities for all students to practice independent living skills (e.g., dorm management, clean-up duties, etc.)?

➢ Meet with the social development director. Ask him or her to explain the dormitory structure including methods used to assign students to dorms, monitor student management of the dorms, use Residential Advisors to guide student management of the dorms, and provide opportunities for students to learn, practice, and demonstrate personal responsibility for their living areas.

➢ Interview students. Ask them to describe the management of the dorm. Are the dorms student-run? What is the role of the Residential Advisor in the management of the dorm?
R2.  **Supervision of Student Living Areas**

Centers shall:

a. Provide staff supervision of all student living areas at levels that assure the safety, security, and accountability of all students at all times.

b. Develop a structured process for sharing information that ensures effective student accountability.

Strategy:

- Review Residential Advisor staffing and schedule. Is there Residential Advisor coverage in the dormitories at all times when students are present?

- Review Residential Advisor position descriptions. Are Residential Advisor responsibilities clearly defined in regard to ensuring safety and security of students at all times?

- Interview Residential Advisors. What process do they use to evaluate and document student behavior?
R3. **Delivery of Services to Students**

Centers shall develop a structured process for the sharing of information between residential staff and other center staff as needed to assure the coordinated delivery of services to students.

Strategy:

- Are there opportunities for social development staff to share information with each other about students (e.g., shift change meetings)?
- Interview Residential Advisors. How are Residential Advisors involved in ESPs? Are they part of the ESP team?
- Interview students or obtain information in focus groups to determine the quality of residential life.

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Rationale for Rating:

R4. **Reporting/Documentation/Recordkeeping**

Centers shall:

a. Implement safeguards to assure that personal information about individual students, subject to the Privacy Act, is shared among staff only to the extent necessary to ensure the safety and effective provision of services to students, and no further, in accordance with Chapter 6, Appendix 601, Student Rights to Privacy and Disclosure of Information.

b. Develop procedures to record important information about student-related events as the events occur and to transmit the information from each shift to the next.

c. Maintain individual records for each student that contain, at a minimum, basic identifying information, including emergency contacts, and written parental consent (minors) for weekend passes to approved destinations. Such records shall be readily accessible to dormitory staff.
Strategy:

- Review residential files (see attached sample form). Are records kept in a secure area? Who has access to records?

- Determine if records are available that indicate students are involved in independent living activities such as dorm maintenance, safety and health maintenance.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students accept responsibility for their living conditions and leisure time activities.

Strategy:

- Interview students. How are they involved in managing the dormitory areas?

- Review notes of dormitory council meetings and ask for list of dorm leaders/officers and their duties. Are leader meetings regularly scheduled? What duties do leaders have? What responsibilities? Observe dormitory meetings, peer courts, and student/staff interactions to determine if students lead or participate in those activities. Do students express their views?

- Ask students how leaders are chosen and trained. Are students involved in choosing leaders and deciding on responsibilities for them?

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Rationale for Rating:

August 6, 2013
Q2. Student residences are attractive, clean, safe, and in good repair.

Strategy:

- Walk through the dormitories to determine if furnishings are in good repair, walls and floor coverings are in good repair, bathroom facilities are clean, and vandalism and graffiti are absent. Are students and staff clear on appropriate wall and locker posters and other decorations? Do students feel safe in this regard, or are there instances of racial, sexual, gang or other decorations that are negatively focused on certain groups?

- Determine if the center has a system for regular dorm inspections. How are problems remedied? Who conducts the inspections and how are students involved?

- Interview students and staff to determine what practices are in place to maintain a safe and healthy living environment.

- Interview students. What happens if they damage property or apply graffiti? How is graffiti handled (e.g., immediately removed and how, or left for an inappropriate length of time)?

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Rationale for Rating:

Q3. Students demonstrate self-management skills.

Strategy:

- Determine how the center teaches independent living skills. Ask students for examples of center activities that help them to prepare for living on their own (e.g., waking up to an alarm clock, learning to keep a checking account).

- Interview students. Ask them to explain the attendance policy. Do they understand how attendance relates to employment? Does anything happen to their pay when they are absent/AWOL? How is attendance linked to future employability?
Interview students to determine whether they can both discuss rules and describe how to go about obtaining services (e.g., getting approval for leaves, using health services, getting a check cashed, and getting help in class or shop).

Review documentation that provides objective information about choices students on center make over time (e.g., Does the center have a high pregnancy rate? Are students involved in recreational activities? Do SIRs indicate high rates of medically related incidents such as suicide gestures/ideation, alcohol/drug involvement, sexual assault, and sports-related injuries?). Do students demonstrate observance of center policies? What is the proportion of smokers to nonsmokers on center?

Determine if the center has independent living areas in existing dorms or separate transitional living facilities. If so, how do students qualify for them? Are these areas supervised? Are they maintained by students or staff? Do students cook for themselves or eat in the dining hall?

Observe student behavior. Do students exhibit behaviors indicating self-management? For example, are students and/or staff smoking outside in designated smoking areas? Are students visibly working in the kitchen to prepare meals, maintaining the grounds, and providing other center maintenance activities?

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Rationale for Rating:

Q4. Students feel safe in their living areas.

Strategy:

- Review minutes from monthly safety committee meetings for safety issues related to student living areas; check for corrective action plans, repeat concerns, and follow-up.

- Interview students about staff responsiveness to individual student problems and general student issues. Do students feel their concerns are taken seriously and resolved satisfactorily? Do they have any safety concerns?
Interview students. Do they have access to the Center Director if they have safety issues? Do they feel safe on center? If they have had safety issues, have they reported them? Do student leaders act as a resource for safety concerns?

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Rationale for Rating:

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August 6, 2013
3.17 WELLNESS

PURPOSE

P1. To enhance the employability of students by providing them with information about practices that lead to good physical, mental, oral, and emotional health.

REQUIREMENTS

R1. Required Instruction

Centers shall provide instruction to all students in the following subjects:

a. Health education and the decision-making model
b. Emotional and social well-being
c. Depression, grief, and suicide
d. Relationships and sexuality, including relationship aggression
e. Reproduction and birth control
f. Sexually transmitted diseases
g. Consumer health
h. Nutrition and fitness
i. Alcohol and other drugs of abuse
j. Relationship of a healthy lifestyle to successful job retention
k. Sexual assaults
l. Sleep hygiene (guidelines to achieve restful sleep)
m. Oral disease prevention and oral hygiene instruction

Strategy:

➢ Request copy of the Wellness curriculum. Are required topics covered? Who is responsible for instruction? What instructional methodologies are used?

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Rationale for Rating:

August 6, 2013
R2. Reporting/Documentation/Recordkeeping

Centers shall ensure that all student progress and accomplishments are documented and recorded using the automated Center Information System.

Strategy:

- Review sample files in CIS for compliance.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students can describe how and when to access Wellness services.

Strategy:

- Interview students to ensure they know how to access health care on center and in their communities after they leave Job Corps.
- Review orientation information and Wellness curriculum materials to ensure students have knowledge of community resources both locally and at home.

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Rationale for Rating:

Q2. Students demonstrate basic knowledge of the steps to maintain personal wellness.

Strategy:

August 6, 2013
Determine how the center encourages wellness. Are students encouraged to make healthy food choices (e.g., color-coded choices, low-fat items)? Does the center’s weight control program involve recreation? Does the center have a walker’s club? Is there a strength-building program? Does the center foster good dental care? Do students with health problems have a personal improvement plan?

Interview students to determine if they have knowledge of safe work practices. Do they use self-appraisal to identify their own high-risk behaviors? Can they identify the positive or negative effect their choices have on their health? Do they understand self-care concepts?

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Rationale for Rating:

Q3. Students can describe how maintaining a healthy lifestyle will contribute to their ability to maintain employment.

Strategy:

- Interview students. Can they describe work-related health issues and how to obtain help and advice regarding health issues when needed? Can they describe how wellness supports sustained employment?

- Review a sample of student PCDPs. Are health objectives included in the plans?

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August 6, 2013
PRH 3.17 - Summary Rating

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August 6, 2013
3.18 RECREATION AND LEISURE TIME ACTIVITIES

PURPOSE

P1. To promote productive and socially acceptable use of leisure time.

P2. To holistically build students’ employability skills through the integration of career technical training and leisure time activities.

P3. To assist students in understanding and developing lifelong leisure time skills and habits.

P4. To build students’ self-esteem by developing teamwork, good sports conduct, and other positive social behaviors.

P5. To enhance the Job Corps experience for students by providing them with opportunities to participate in enjoyable and safe recreation.

P6. To promote lifelong health through physical activity and exercise.

REQUIREMENTS

R1. Planning

Centers shall:

a. Develop and maintain a calendar of recreational activities and events, and distribute the schedule to students in advance of the activities listed.

b. Involve students in selecting and planning recreational activities.

c. Conduct periodic surveys of student recreational interests and participation, and use the information gathered in planning recreational activities.

d. Coordinate with career technical, academic, counseling staff, and social development staff to ensure integration of student training with leisure time activities.

e. Consider cost efficiency in planning recreational off-center activities.

Strategy:

➢ Interview recreational staff. Is a recreational schedule provided to students? How often is it updated? What is the process for soliciting student feedback on recreational interests?

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Rationale for Rating:

August 6, 2013
R2. Recreational Activities

Centers shall provide a wide variety of activities open to all students. Activities should reinforce and provide time to practice communication skills, to demonstrate positive attitudes and behaviors, and to work and participate in groups.

a. Activities must include but are not limited to:
   1. Group fitness classes
   2. Individual fitness activities
   3. Organized sports
   4. Exercise groups or clubs
   5. Group sessions with employers or career professionals
   6. Entrepreneur classes
   7. Evening resume writing and interview techniques
   8. Volunteering, mentoring or tutoring

May include:
   1. Cultural events
   2. Dancing and theater
   3. Radio and/or television mockups
   4. Playwright, rap and poetry seminars
   5. Physical education and conditioning (yoga, spinning, etc)
   6. Arts and crafts
   7. Reading and computer resource facilities

Strategy:

- Review fitness and sports schedule(s) for inclusion of all required activities.
- Visit recreation center to view the location of classes, activities, and exercise facilities during an activity or open hours, if possible.
- Interview recreation staff to determine how stress reduction is integrated into recreation.

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R3. Community Service Projects

Centers shall provide opportunities for staff and students to participate in service activities.

Strategy:

➢ Are there opportunities for students to participate in community service projects? What is the selection process? How often are opportunities available?

➢ Interview students. Ask them to describe how the center is involved in local community service activities. Have students participated? What kind of encouragement do they get for performing community service? Do they have input into the kind of community service they are involved in (e.g., CTT projects, food drives, National Youth Service Day)? Are they required to complete community service hours as a requirement for graduation or other status, such as leadership positions or extra academic credit?

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Rationale for Rating:

R4. Supervision

Centers shall provide adequate staff supervision of events, activities, facilities, and equipment to assure participant safety.

Strategy:

August 6, 2013
➢ Review the recreation advisor schedule to ensure adequate coverage is provided for activities at all times.

➢ Is transportation adequate? Are there activities available both on and off center?

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**R5. Water Safety Training**

Centers shall:

a. Provide students with instruction in water safety as follows:

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<th>All centers</th>
<th>Video-taped presentation on water safety</th>
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<td>Centers sponsoring recreation trips that involve swimming, in-water activities, or access to pools/other bodies of water</td>
<td>Water safety instruction and swimming proficiency test for all students</td>
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<tr>
<td>Centers with pools or ready access to pools/other bodies of water</td>
<td>Water safety instruction and swimming proficiency test for all students</td>
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b. Document the provision of water safety instruction and the swimming proficiency of each student in CIS.

c. Prohibit students from participating in swimming or other water-related activities until the students have received water safety instruction and demonstrated swimming proficiency.

d. Ensure that all water-related activities are supervised by certified lifeguards.

e. Require the use of the buddy system in all swimming activities, and the use of personal flotation devices in all boating activities.

**Strategy:**

August 6, 2013
How and when is water safety training provided to students? Are water activities available? Who supervises? How is student participation in water safety training evaluated and documented?

Interview the recreation manager. If water activities are part of the recreation schedule, ask to see a lifeguard schedule.

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Rationale for Rating:

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**R6. Use of Videos**

Centers showing videos of commercial motion pictures to students on center shall be licensed to do so under an umbrella license through a national agreement between the Office of Job Corps and the Motion Picture Licensing Corporation.

Centers will receive a list of film titles directly from the vendor(s) each month indicating the movies covered under the agreement. Center Operators shall assume liability for showing any film(s) that do not appear on the list.

Strategy:

- Interview recreational staff. Is there an SOP regarding the use of videos? Ask for and review the list of available movies.

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Rationale for Rating:

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**R7. Leisure Time Employment**

August 6, 2013
a. Centers may authorize gainful leisure time employment of students so long as the employment does not interfere with training activities.

b. Leisure time employment is not considered training or work-based learning. Accordingly, students are not considered federal employees for FECA purposes while engaged in leisure time employment, except when the employment occurs on center.

Strategy:

- Interview center management. Who is responsible for coordinating the leisure time employment program? Is staff involved in finding opportunities for students? When are students able to participate in leisure time employment?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Recreation activities appeal to and are utilized by most students.

Strategy:

- Interview students in a focus group. Are recreation activities offered to all students or are they reserved for only those students who are high achievers or center leaders? What are the most recent activities? How did students hear about them?

- Observe on-center activities such as arts and crafts, sports, etc. Are students participating? Do activities include diversity (e.g., female students, students of different ethnicities)? Is supervision positive?

August 6, 2013
➢ Ask students to describe any leisure-time employment. Is it available and encouraged? Is transportation provided? Does the center use this activity to teach employability skills or do students just go to work and return to center?

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Rationale for Rating:

Q2. Students demonstrate appropriate use of facilities and equipment.

Strategy:

➢ Observe recreation facilities during hours of operation for equipment use. Inspect recreation facilities and equipment for damage. Note equipment conditions. Are facilities and equipment well maintained and free of vandalism?

➢ Observe facilities for graffiti and signs of vandalism that are unrepaired (e.g., kicked-in doors, broken windows, broken equipment). Ask students to describe the policy for vandalism. Review the student handbook to see if it clearly states the policy.

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Rationale for Rating:

Q3. Students can communicate the value of community service.

Strategy:

August 6, 2013
Interview community members, especially those involved in community service (e.g., Lions Club, local Red Cross). How do Job Corps students participate? Do community members appreciate student efforts?

Review any publicity that relates to Job Corps student community service. Does the center receive news coverage, radio coverage, or other publicity? Is it positive?

Interview staff. How are students sanctioned if they are involved in property damage in the community?

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3.19 STUDENT GOVERNMENT AND LEADERSHIP

PURPOSE

P1. To teach students citizenship skills.
P2. To provide students with practice in self-government and opportunities for input into center policies.
P3. To provide students with opportunities to learn and practice positive leadership skills.

REQUIREMENTS

R1. Student Government Association (SGA)

Centers shall develop and support an SGA program that includes, at a minimum:

a. A designated staff coordinator
b. A written constitution
c. Elected SGA officers
d. Committees that provide input into policies affecting student life on and off center
e. Regular meetings between the Center Director and SGA officers
f. A training plan for SGA officers

Strategy:

➢ If possible, attend a scheduled SGA meeting. If not, meet with the SGA and ask for a copy of their bylaws and minutes. Who is the SGA coordinator? How often are general meetings held? How often does the SGA meet with center staff excluding regular SGA meetings?

➢ Speak with the SGA officers. Do they meet regularly with the Center Director? With the center’s senior management staff? In what ways are they involved in managing the center?

➢ Speak with the staff coordinator and ask to see the training plan for SGA officers.

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Rationale for Rating:

August 6, 2013
R2. **Student Leadership**

Centers shall develop and support leadership training that includes, at a minimum:

a. Formal leadership training curriculum

b. Ongoing in-service training for student leaders

Strategy:

- Ask the staff coordinator when the last elections were held. Have the current SGA officers received training? Request a copy of the training plan.

- Review the leadership training curriculum. Is the training available to all students or just those interested in participating in student government? Who delivers the curriculum? Are staff from other departments involved? How?

- Speak with the Center Director. How does the center promote student leadership other than the SGA?

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**Rationale for Rating:**

R3. **Student Benefit Fund**

Centers shall establish a student benefit fund to be managed by the SGA with the assistance of center staff. The purpose of the fund shall be to provide the SGA with the ability to purchase items and services for the benefit of all students. The fund shall have the following features:

a. The fund shall be self-supporting and shall not include any appropriated Job Corps funds. Allowable sources of income include, but are not limited to, the following:

1. Operation of a store or canteen
2. Operation of other concessions, such as telephone systems and vending machines
3. Student fines
4. Student fund-raising activities
b. A staff member shall be designated to assist the SGA officers in overseeing the operation of the fund.

c. The fund may not be used to pay for goods or services that are normally part of center operating costs.

d. Establish a simple accounting system for the student benefit fund, and involve SGA officers in the management of the accounting system. The accounting system shall include, at a minimum, the following:

1. A written accounting and audit plan. The accounting plan shall ensure the integrity of the fund by establishing an appropriate set of checks and balances, to include, at a minimum:
   a) Dual approval of all expenditures by the SGA president or designee and the Center Director or designee.

2. Separation of payment and collection duties.

3. Maintenance of a bank account (checking or savings or both).

4. A written record of income and expenditures.

5. Periodic financial reports.

6. Annual audits by the center operator (corporate office or agency headquarters designee).

Strategy:

- Interview the SGA treasurer and see if he or she is involved in the management of the student benefit fund. What are his or her responsibilities?

- Interview the staff member responsible for assisting in the financial management of the fund. What fundraising efforts and activities do students engage in (e.g., canteen, vending machines, fines, etc.)?

- Request copies of financial audits, bank statements, and monthly financial reconciliations. How are expenditures requested and approved? Who signs off on checks? Do minutes of meetings reflect expenditure approvals?

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Rationale for Rating:

August 6, 2013
R4. **Reporting/Documentation/Recordkeeping**

Centers shall ensure that all student leadership training/student government participation is documented and recorded using the automated Center Information System (CIS).

**Strategy:**

- Review sample student profiles in CIS for compliance. Validate if students are being credited for their participation in leadership training.

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**Rationale for Rating:**

**QUALITY INDICATOR(S)**

Q1. Students recognize the student government association as an effective avenue for input to center policies.

**Strategy:**

- Interview students in focus groups. Ask how decisions are made on center and if they have had the opportunity to be involved in the process. How? Are student government representatives available to them so they can give input? Are regular meetings scheduled or is input informal and voluntary? Is their input forwarded to center management? How? Are they allowed to be involved when student input is presented to management, or do only student leaders have direct access? Does center management respond to the input? Describe any recent policy or other changes that happened because students requested them. Have any students been involved in team efforts to develop new rules or recommendations for management? How did that turn out?

- Interview student leaders in a focus group. Ask the same questions as above and compare perceptions. Also ask in what other ways they are involved in center operations. Are they exempt from other duties and assignments because of their leadership positions? If so, ask for examples.

- Ask staff how student government is involved in center management.

August 6, 2013
Q2. Students recognize student leaders as role models and turn to them for assistance in resolving problems.

Strategy:

- Interview students. How do they view student leaders? Ask about instances where they have sought assistance from student leaders in solving problems or sought advice on ways to improve performance.

Q3. Student leaders are actively involved in the operation of the center.

Strategy:

- Interview students. Who makes the rules on center? Have students been involved in developing center standards of conduct? Are students involved in center operations? How is student input solicited and used? Does center management staff meet with students on a regular basis to discuss important issues?

- Review notes of dormitory council meetings and ask for a list of dorm leaders/officers and their duties. Are meetings regularly scheduled? What are leader duties and responsibilities? Observe dormitory meetings, peer courts, and student/staff interactions to determine if students lead or participate in those activities. Do students express their views?
Q4. Students have the opportunity to practice citizenship and leadership skills.

Strategies:

- Interview students. How are they involved in managing the residential areas? Other areas? What leadership positions are available in the dorms, academic, career technical, and other areas? How are leaders chosen?

- Ask students what community action events they participate in, if any (e.g., supporting local blood drives, volunteering for community clean-ups, speaking at city council and local government meetings, volunteering as tutors at local schools, working in the community library, assisting with voter registration).
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3.20 DRIVER EDUCATION

PURPOSE

P1. To provide students with the skills and knowledge necessary to pass the written and driving portions of the state operator’s license examination.

P2. To provide all students who are eligible under state law, the opportunity to attain a state operator’s license.

REQUIREMENTS

R1. Required Instruction

Centers shall provide driver education training, early in the students’ enrollment, to all eligible students who do not already possess a driver’s license. The training shall include classroom and behind-the-wheel instruction that meets state mandated requirements.

Strategy:

- Request a copy of the curriculum. Does it cover content from the state driver’s education manual? When are students scheduled in driver education class? Behind-the-wheel training? Are there center-specific eligibility requirements? If so, how and when are students informed of these requirements?

- Speak with the manager responsible for driver education. Does the center have a goal for the number of permits/licenses to be obtained? How does the center track attainment?

- Pull a CIS driver’s license status report to determine the percentage of students without a driver’s license or permit.

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Rationale for Rating:

R2. Assistance for Students With Revoked or Suspended Licenses

Centers shall identify students who are prohibited from attaining an operator’s license due to prior offenses and assist these students in re-establishing their eligibility and securing a license prior to completion.

August 6, 2013
Strategy:

- Interview driver’s education instructor(s). What assistance is provided to students with revoked or suspended licenses? What assistance is available to help students pay the necessary fees?

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Rationale for Rating:

**R3. Payment of Fees**

Centers shall pay all learner’s permit, license, and related test fees.

Strategy:

- Interview driver’s education instructor(s). What is the process for payment of fees? Are students allowed to take the tests in their home areas? If yes, how are payments handled?

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Rationale for Rating:

**R4. Reporting/Documentation/Recordkeeping**

Centers shall ensure that all student test results and progress are documented and recorded using the automated Center Information System.
Strategy:

➢ Review student profiles in CIS for compliance (e.g., print out driver’s education report).

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. All students are provided the opportunity to obtain their driver’s license prior to graduation.

Strategy:

➢ Is obtaining a driver’s license emphasized on center? How and when are students assigned/scheduled for driver’s education classes?

➢ Review course materials. Do the materials reflect current state laws, including graduated licensing, as applicable?

➢ Review enrollment and completion levels. Is the center graduating an appropriate number of students with driver’s licenses? Are students from all career technical areas, not just the union trades, able to take driver’s education?

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3.21 CAREER TRANSITION READINESS

PURPOSE

P1. To assist students in assessing their readiness for career transition.

P2. To ensure that students are fully prepared to conduct a successful job search leading to employment.

P3. To prepare students to effectively access resources and services that will assist them in making a successful transition to the workforce.

REQUIREMENTS

R1. Separation Status

Centers shall determine the level of services to be provided based on each student’s separation status.

Strategy:

- Speak with the senior education and training administrator. Is the center using the CIS projected separation report? Does the Career Management Team meet with students prior to separation? How are students made aware of benefits available to them based on their separation status? Ask what services are available to support students in progressing to CTS. Who is responsible for assessing student readiness for the transition? How is that assessment done? When?

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Rationale for Rating:

R2. Job Search Skills

At least 45 days prior to projected graduation, centers shall assist each student in reviewing job search skills and strategies including the following:

a. Sources of employment
b. Conducting an Internet job search
c. Completing a job application
d. Updating the resume

August 6, 2013
e. Writing a cover letter
f. Interviewing for a job
g. Worker’s rights and responsibilities, including accommodation needs for employment, as appropriate
h. Strategies for succeeding during the first weeks on a job

Strategy:

➢ Interview Career Transition Readiness (CTR) staff. Is there a CTR curriculum? Does the curriculum cover all the required topics? Who is responsible for teaching the curriculum? If possible, visit classes to assess instructional strategies and approaches.

➢ Determine how the center ensures that skills introduced in CPP are being mastered during CTR.

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Rationale for Rating:

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R3. **Personal Career Development Plan**

Centers shall collaborate with Career Transition Specialists and each student to update the student’s Personal Career Development Plan, using it to develop an employment plan or personalized job search strategy, or plan for advanced education including identification of federal funding options, as appropriate.

Strategy:

➢ Speak with the CTR staff. Are CTS Specialists contacted prior to separation? Who makes the contact and when? Are Case Notes included in the student’s ePCDP?
R4. \textit{Job Search Credentials}

Centers shall assist student in assembling documents necessary for obtaining employment, including originals of personal documents (see PRH Chapter 1, Section 1.6) and those credentials that document the student’s accomplishments.

Centers shall inform students on how to obtain copies of their high school transcripts earned while on center. Centers must provide instructions to students for contacting the high school partner (including name, address, and telephone number) to obtain his or her transcripts.

Strategy:

- Speak with the CTR staff. Are resume-building classes available throughout CDP? Review sample student files in CIS to see if resumes are included in their ePCDP. Check regional policies on the content of employability kits and compare it to the center’s checklist.

- Ask students how, when, and why resumes are written. Do students know how to send a resume using the Internet? Are computers and resume software packages available to students?

- Check the center operating procedures to determine what copies of documents students should receive when they graduate. Do students receive these documents prior to separation? Who is responsible for ensuring that they do?
Rationale for Rating:

R5. **Transitional Needs Assessment**

Centers shall assist each student in assembling and updating his or her transitional support needs, including:

a. Housing  
b. Transportation  
c. Child care  
d. Health care  
e. Work clothing and tools  
f. Food and nutrition  
g. Budgeting/money management  
h. Mentoring/counseling  
i. Job retention support  
j. Legal services  
k. Federal funding for advanced education, as appropriate

Strategy:

- When and how are transitional needs assessed for each student? Is there a transition panel for student? What student feedback is solicited and what are follow-up procedures?

- What strategies are used to address transitional needs during CDP? During CTP? How are these communicated with the student’s CTS Specialist?

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August 6, 2013
R6. Job Development

Centers shall provide job development, referral, and placement services to graduates, as appropriate. For those graduates who entered the program with an employer referral, centers shall notify the referring employer of the student’s upcoming graduation.

Strategy:

- Speak with the CTR staff. Are there opportunities for students to seek jobs prior to separation? How does the center assist students in their efforts? What assistance is provided to students wishing to pursue postsecondary education, AT, or ACT or join the military?

- Determine who is responsible for job development. Is there evidence that the center is documenting job development efforts? To what extent does the center promote WBL as a means to secure a pre-separation placement?

- Is there evidence that center staff is providing students with information on how to obtain copies of their high school transcripts?

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R7. Transition Resources and Services

At a minimum, centers shall connect graduates and former enrollees with career transition resources appropriate to their needs and in accordance with the center CDSS plan. Centers shall:
a. Establish a personal connection between the potential graduate and the career transition services provider.
b. Initiate or support pre-graduation job search efforts.
c. Develop resources to meet transitional support needs.

Strategy:

- Determine who contacts the CTS Specialists prior to student separation. How is the contact made? Does the center provide students with written information regarding their CTS Specialist? Interview students and instructors to determine the quality of transitional services for transitional needs.

- Assess the career/resource center for updated job bank and labor market information, employment opportunities, videos and information on interviewing, computer access, etc. Are students using the facilities effectively?

- Determine if students are provided opportunities to visit/register at their local One-Stop. Does the center partner with community and faith-based organizations to provide support services and/or address transitional needs?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Separating graduates feel fully prepared for successful job search.

Strategy:

- Interview staff. How does the center involve local employers or community resources to help determine student employment readiness? How is job readiness determined? How is employer input used in this process? Are alternate contacts for the student updated routinely?
- Interview students who are in the transition readiness phase and ask them to describe their marketable skills. Ask students to bring copies of their credentials with them to the interview.

- Interview ELL students in the transition readiness phase to assess their employability based on their demonstration of language, thinking, and interpersonal skills.

- Observe program completers in the transition readiness phase in terms of dress, language, and behavior. Is their behavior appropriate? Are their dress and language conducive to employment?

- Ask students who are about to graduate what kinds of transitional assistance they will need when they leave. Ask if they have discussed these needs with their Career Transition Specialist. If so, what was the outcome? If not, do they plan to discuss their needs with the Career Transition Specialist? How long ago did they see the Career Transition Specialist? What was the content of the meeting? Review transition files and PCDPs to confirm student replies to these questions. Are alternate contacts for students updated routinely?

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Rationale for Rating:

Q2. Graduates know where to find assistance in meeting post-center placement and transitional support needs.

Strategy:

- Determine if there are systems in place to ensure students know how and where to obtain Job Corps placement services.

- Find out if the center invites local employers and community service providers to speak with students and explain their services.

- Review student records with the CTS Specialists. What kinds of transition services are they providing for students? Were Specialists effective in providing services to students in transition, creative/innovative in addressing problems in obtaining services, and aware of and competent in accessing appropriate community-based services? Are partnerships and

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memoranda of understanding being developed to address gaps in transition services in the areas of need?

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Rationale for Rating:

PRH 3.21 - Summary Rating

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</table>
Sample Consolidated Rating Matrix

As noted in the PAG Preamble, Regional Offices have flexibility in weighting the scores of OA, Center, and CTS assessments based on a variety of factors. Career Development is inherently a center responsibility, and the sample matrix provided is exclusively for center use. Regions have the flexibility to eliminate factors or add factors to their matrix.

Regional Directors and/or Division Chiefs should develop the matrix prior to the assessment so that the Review Team understands what areas need to be reviewed and how the ratings are to be established.

The sample matrix below breaks out the CDP program into distinct elements that can be assigned to various Review Team members as part of the assessment. Each major functional area is weighted fairly equally in this model but can be adjusted if more emphasis is desired in certain areas.

<table>
<thead>
<tr>
<th>SAMPLE CENTER CDP MATRIX</th>
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<tbody>
<tr>
<td>Career Development Period</td>
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<tr>
<td>Job Corps Center</td>
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<tr>
<td>Program Compliance Rating</td>
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<tr>
<td>3.1 Center Plan</td>
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<tr>
<td>Management of CDP</td>
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<tr>
<td>3.2 Administration and Management of CDS</td>
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<tr>
<td>3.3 Personal and Career Counseling</td>
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<td>3.4 Student Standards of Conduct</td>
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<td>3.5 Evaluation of Student Progress</td>
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<td>3.6 Center-Based Learning</td>
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<tr>
<td>3.7 Career Success Standards</td>
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<tr>
<td>Management Rating</td>
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<tr>
<td>3.9 Reading</td>
</tr>
<tr>
<td>Academics Rating</td>
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<tr>
<td>3.10 Mathematics</td>
</tr>
<tr>
<td>3.11 HSE/HSD</td>
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<tr>
<td>3.12 ESL</td>
</tr>
<tr>
<td>3.15 Information Technology</td>
</tr>
<tr>
<td>3.20 Driver Education</td>
</tr>
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<td>Academics Rating</td>
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<tr>
<td>3.8 Work-Based Learning</td>
</tr>
<tr>
<td>Career Technical Training</td>
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<tr>
<td>3.13 Career Technical Training</td>
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<tr>
<td>- CTT Project Application</td>
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<td>- ACT/AT</td>
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<td>- OCT</td>
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<td>3.15 Information Technology</td>
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<td>Career Technical Rating</td>
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<tr>
<td>3.16 Residential Living</td>
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</table>

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### Independent Living Skills

| 3.17 Wellness                  |  |  |  |  |  |  |  |
| 3.18 Recreation and Leisure Time Activities |  |  |  |  |  |  |  |
| 3.19 Student Government and Leadership       |  |  |  |  |  |  |  |
| 3.20 Driver Education                           |  |  |  |  |  |  |  |
| 3.21 Career Transition Readiness               |  |  |  |  |  |  |  |

#### Independent Living Rating

| Average Compliance Rating |  |  |  |  |  |  |  |  |
| Program Quality Rating    | Rating Based Upon PRH Quality Indicators |

#### Management

- Academics
- Career Technical

| Average Quality Rating |  |  |  |  |  |  |  |  |

The matrix above does not provide for a rating of section 3.24, Career Transition Readiness. Instead, a separate rating matrix is devised to capture the CTR/CTS functions of a center, and the matrix is used to capture CTR/CTS activities that would normally be found in PRH Chapter 4.

The Job Corps community has found that the smooth transition between CTR and CTS is dependent upon the center providing essential services to students prior to separation. As such, the matrix below provides for emphasis on CTR activities while being used to replace the CTS matrix used for the CTS period.

A separate CTS matrix is included in Chapter 4 of the PAG. However, since functions in Chapter 4 are inherently CTS functions, the matrix in Chapter 4 should be used for stand-alone or center contracted CTS operations.

Regions have the flexibility to add specific requirements or quality indicators that they would like to emphasize as part of the assessment process.

Below is a sample matrix that can be used to replace Chapter 4 on Job Corps center assessments.
### SAMPLE CENTER CTR MATRIX

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**Program Compliance Rating**

- R1. Separation Status
- R2. Job Search Skills
- R3. Personal Career Development Plan
- R4. Job Search Credentials
- R5. Transitional Needs Assessment
- R6. Job Development
- R7. Transition Resources and Services

**Average Compliance Rating**

**Program Quality Rating**

- R1. Separation Status
- R2. Job Search Skills
- R3. Personal Career Development Plan
- R4. Job Search Credentials
- R5. Transitional Needs Assessment
- R6. Job Development
- R7. Transition Resources and Services

**Average Quality Rating**

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<td><strong>Exceptional (8/9)</strong></td>
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<tr>
<td>Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.</td>
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| **Very Good (6/7)**                        |
| Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data. |

| **Satisfactory (4/5)**                     |
| Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data. |

| **Marginal (2/3)**                         |
| Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data. |

| **Unsatisfactory (0/1)**                   |
| Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity. |

**Note:** A glossary of acronyms is located at the end of the PAG Preamble.
**4.0 OBJECTIVES**

To provide eligible Job Corps students with personalized career transition services that lead to long-term employment, earnings growth, career progression, and further education.

To ensure that graduates and former enrollees remain successfully attached to the workforce or further education and training by connecting them with transitional support services within their communities.
4.1 CAREER TRANSITION SERVICES PLAN

PURPOSE

P1. To ensure the efficient, effective, and coordinated delivery of career transition services to graduates and former enrollees.

REQUIREMENTS

R1. Career Transition Services Plan

a. Centers and Career Transition Services (CTS) providers shall prepare and implement a Career Transition Plan, as part of the overall Career Development Services System (CDSS) Plan. The plan shall be submitted for Regional Office approval in accordance with Chapter 5, Section 5.1, R3.c, Career Development Services System Plan.

b. Career transition services reflected in the plan shall be tailored to the individual needs of each graduate and former enrollee.

c. At a minimum, the Career Transition Services Plan shall include:

1. The rationale for the Career Transition Period (CTP) design and how it will ensure the provision of individualized services to assist each graduate and former enrollee.

2. Organization, to include detailed descriptions of:

   (a) How the career transition function will be staffed.

   (b) Geographic area(s) to be served and where staff will be located to provide services.

   (c) How career transition staff will coordinate and team with center career development staff to ensure continuity of service to separating students, including assistance with post-center certification testing or experience requirements to gain industry credentials.

   (d) How career transition staff will interact with students and other staff during the Career Preparation and Career Development periods.

   (e) How career transition staff will coordinate efforts with One-Stops, National Training Contractors, and other post-center support providers to meet the post-center needs of graduates and former enrollees, including tracking and documenting student certification attainment.

   (f) How the Personal Career Development Plan (PCDP) will be used to develop an employment plan/job search strategy and/or postsecondary educational plan, including support services for the student, which must build upon students’ demonstrated skills.
attainment and, when applicable, students’ industry-recognized certification(s) and/or licensure(s).

(g) How career transition staff will inform students that transition payments will be forfeited if they do not cash received checks within 12 months of the date of separation, fail to report non-receipt of checks, or fail to update contact information to ensure proper delivery of transition payments.

(h) How career transition staff will make and document reasonable efforts to locate students when checks are returned or outstanding.

3. Methods, resources, and tools to accomplish the following:

(a) Graduate and former enrollee contact throughout the service period

(b) Assessment of placement and transitional needs

(c) Development of personalized job search skills and strategies

(d) Job development and referral

(e) Identification of and referral to transitional support services

(f) Counseling for job retention

(g) Arranging continuing services for graduates who relocate during the service period

(h) Distributing and safeguarding payments, to include locating students when checks are returned and/or unclaimed to ensure that students receive payments

(i) Informing students that failure to report non-receipt of transition payments or failure to cash a received transition payment check within 12 months of separation will result in forfeiture of the payment, and that students have the obligation to update their contact information with their CTS provider

(j) Identification of and referral to postsecondary educational opportunities and federal funding options, as appropriate

Strategy:

➢ Review plan for required elements. Does it have Regional Office approval? Interview CTS Manager and ask about staffing, caseloads, and how services are provided. Ask for a copy of the organizational chart, caseload summary, and detail reports. Check for consistency with MPO-31/33 report.

➢ How are goals established and how are staff held accountable for meeting these goals? Ask for a copy of a performance plan, if applicable.

➢ Interview CTS Specialists and ask about their roles and responsibilities.
Are they familiar with the CTS plan?
How do they use the POMS-10, POMS-20, MPO-31/33, and PLE-600M reports?
What are their assigned goals both monthly and for the program year?
What are their case management practices?

➤ Review Outreach Plan. Check the plan and verify that it is being followed.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Career transition services are delivered in accordance with the Career Transition Services Plan.

Strategy:

➤ Pre-onsite: Review annual CTS plan. Was it submitted on time?

➤ Does it include the required elements? How are the activities and strategies used at the center supportive of these requirements? See PRH Chapter 4, Section 4.1, R1.

➤ Pre-onsite: Review calendar of activities. Look for participation on boards, meetings with other agencies and employers, and community involvement.

➤ Interview the CTS Manager. Are staff held accountable for achieving national and model-based goals? How is goal achievement tracked on center?

➤ Interview or call staff at centers for which the service provider has CTS responsibility. How do they describe their relationship with the CTS provider? Do CTS and center staff work together cooperatively?

➤ Interview CTS Specialists to discuss the process they use for meeting goals. Does the Specialist know his or her individual goals? Does the Specialist have access to the monthly POMS-10 report to determine performance? What system does the Specialist use to remain in contact with separated students throughout the CTS period? How often is contact made?
Interview center staff (e.g., Business and Community Liaison). Does regular communication exist between center staff and the CTS provider? Are CTS Specialists involved in strategy meetings with center staff? Does the CTS Manager/staff receive required documents (Training Achievement Record, PCDP, resume, etc.) in a timely manner?

Interview the CTS Manager. How is communication with Job Corps partners encouraged and documented? How has feedback from centers, the Regional Office, and other Outreach and Admissions/CTS providers been used to make improvements in the placement process?

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Rationale for Rating:

Q2. Student transition checks are delivered to students.

Strategy:

Review procedures for delivering transition checks to students. Are records/logs maintained to track the disbursement of checks? Are students required to show identification when checks are picked up in person? Review records of checks returned to the Job Corps Data Center. Check whether procedures are adequate for maintaining current contact information. Review Case Notes for students whose checks were returned. What actions/steps were taken to attempt to deliver transition checks to the student?

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4.2 ELIGIBILITY FOR SERVICES

PURPOSE
P1. To establish eligibility criteria for career transition services.
P2. To establish the duration of the Career Transition Services period.

REQUIREMENTS
R1. Definitions
   a. Graduate – one who has completed 60 or more calendar days of enrollment and has completed the requirements of Career Technical Training (CTT), or earned a High School Diploma (HSD) or high school equivalency (HSE) certificate, or who completes both, while enrolled in Job Corps. Students who have exited for any Level 1 Zero Tolerance (ZT) infraction, at any time, do not qualify.
   b. Former Enrollee – one who has completed 60 or more calendar days of enrollment, has not attained graduate status, and whose exit is for reasons other than any Level 1 ZT infraction.
   c. Uncommitted Student – one who has remained in Job Corps less than 60 calendar days (regardless of achievement), or who has exited for a Level 1 ZT infraction at any time.

Note: Level 1 infractions can be found in PRH Chapter 3, Exhibit 3.1, Infraction Levels and Appropriate Center Actions, and in Appendix 501 Introduction.

Strategy:

➢ Interview staff. Do they understand the different definitions? How are services provided within each category of students?

➢ What methods are used to track graduates and former enrollees and the services provided to them?

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Rationale for Rating:
R2. Eligibility for and Duration of the Career Transition Services Period

a. Graduates who separated prior to October 1, 2009, shall receive initial placement services for up to six months following separation, and career transition support services for 12 months following initial placement. Services provided shall not exceed 18 months from separation.

Graduates who separated on or after October 1, 2009, shall receive initial placement services for up to nine months following separation, and career transition support services for 12 months following initial placement. Services provided shall not exceed 21 months from separation.

b. Former enrollees shall be provided with initial placement services for a period of up to three months following separation.

c. Uncommitted students are not eligible for career transition services. Centers shall provide uncommitted students with a referral to a One-Stop center or other service provider.

d. Graduates shall be eligible for transition payments for up to 12 months from the date of separation. Students shall be informed that transition payments will be forfeited if they do not cash received checks within 12 months of the date of separation, fail to report non-receipt of checks, or fail to update contact information to ensure proper delivery of transition payments. Forfeited transition payments may be eligible for reissuance beyond 12 months from the date of separation, at the discretion of the Regional Director. Transition payments, however, may not be reissued beyond 24 months from the date of separation.

Strategy:

➢ Review a 10% sample of graduate placement files. Does the documentation sufficiently validate that the contract is providing quality placement services? Are students’ employability and transition needs assessed? Does the student have a PCDP? Is the plan used to create an action plan to remediate job skills, meet transitional needs, or facilitate quality placements?

➢ Review files to check that placement services are being provided within the required time frame.
QUALITY INDICATOR(S)

Q1. Graduates receive initial placement services and career transition services.

Strategy:

➢ Interview the CTS Manager. Has a monitoring/accountability system been developed to regularly assess services? How frequently are self-assessments conducted? By whom? Has a uniform system been established to report graduate placement transactions? Are systems in place to provide quality career transition services to assigned students?

➢ Interview or call graduates to verify that services are being provided. What support services did they receive? Are the services timely, appropriate, and effective? Are folders processed in a timely fashion? Describe problems arising from delays or changes in termination status.

➢ Interview the CTS Manager. Are solid referral relationships established with high schools, alternative education programs, higher education programs, and apprenticeship programs, when applicable? Which educational institutions are used most frequently to place graduates?

Q2. Former enrollees receive initial placement services and career transition services.
Strategy:

- Interview CTS Manager. Has a uniform system been established to report former enrollee placement transactions? Are systems in place to provide post-center placement services to assigned students?

- Interview or call eligible students to verify that services are being provided. What support services did they receive? Are the services timely, appropriate, and effective?

- Interview the CTS Manager. Are solid referral relationships established with high schools, alternative education programs, higher education programs, and technical/vocational schools? Which educational institutions are used most frequently to place former enrollees?

- Determine if former enrollees are referred to One-Stop services. If so, when?

- How are staff held accountable to ensure students are provided appropriate career transition services?

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4.3 CAREER TRANSITION SERVICES FOR GRADUATES

PURPOSE

P1. To identify and match graduates with placement opportunities in jobs, the military, or further education and training for which they qualify.

P2. To provide graduates with ongoing support to ensure continued employment, education, or industry certification/licensure, and career progression.

P3. To assist graduates in identifying and obtaining support services within the communities in which they work and live.

REQUIREMENTS

R1. Contact

Career Transition Services providers shall:

a. Make direct contact with graduating students prior to separation to assess their needs in accordance with Chapter 3, Section 3.21, Career Transition Readiness (if a projected graduate separates as a former enrollee, see Section 4.4 below, Career Transition Services for Former Enrollees).

b. Maintain direct contact with all assigned graduates at least every 30 days throughout the service period to reassess their needs.

c. Provide or arrange for the following services:

1. Job placement assistance
2. Assistance that promotes job retention
3. Additional placement service for those whose initial placement ended during the service period
4. Assistance with career advancement and certification and/or licensure attainment, where applicable
5. Other transitional support services (housing, transportation, etc.) as appropriate

Strategy:

- Review the CIS Projected Separation Report for a list of students scheduled to separate within the next 60 days. Are students being contacted prior to separation? Is the CTS provider receiving the report in a timely manner from the center(s) it serves?

- How are students being contacted after separation? How often?

- Review PCDP Case Notes to determine if needs are identified.

- Review caseloads. Are they equally distributed so that counselors have enough time to contact their students?
When are transition checks given to students? Are they safeguarded prior to issuance? Where are they kept? Are they signed for by the students? How are undelivered checks handled?

What accountability methods are used to track graduate caseloads? How does the manager track performance and hold staff accountable?

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Rationale for Rating:

R2. Needs Assessment

Career Transition Services providers shall:

a. Provide each graduate, as needed, with an assessment of and assistance in updating resumes, improving interviewing skills, developing self-advocacy skills (for students with disabilities), and developing additional job search strategies throughout the Career Transition Services period.

b. Continue to collaborate with each graduate throughout the Career Transition Services period to assess his or her transition needs to ensure progress toward career goals, including certification or licensure, as outlined in the student’s Personal Career Development Plan (PCDP).

Strategy:

- Review Case Notes to check what services are being provided and how often.

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Rationale for Rating:
R3. Placement Services

Career Transition Services providers shall:

a. Use labor market information and other resources to work with each graduate to develop placement strategies tailored to meet his or her individual needs and career goals.

b. Identify certification testing opportunities and collaborate with the graduate to ensure progress toward certification(s) and/or licensure(s).

c. Provide graduates assistance in obtaining additional educational and training opportunities and federal funding, as appropriate, to meet certification and/or licensure requirements.

d. Identify job leads and/or educational and training opportunities for which the graduate qualifies, and which meet the placement definition as specified in Exhibit 4-1 (Placement Definitions).

e. Emphasize training that leads to better paying jobs (e.g., apprenticeships) and/or jobs with college tuition reimbursement programs.

f. Develop job leads through the use of Internet sources and direct contact with employers, local Workforce Investment Boards, Youth Councils, One-Stop centers, unions, disability-related organizations (e.g., Vocational Rehabilitation, etc.), and apprenticeship programs.

g. Provide direct referrals to suitable job openings and/or educational and training opportunities for graduates in need of placement services.

Strategy:

- Check to see if there is a resource book for job development or any other method established to create referral leads to jobs, educational opportunities, etc. Does the center/contractor have an electronic method for tracking job development efforts and job leads?

- How does the CTS office use employer and community involvement in this process? Is feedback sought from referral sources?

- Review the number of valid placements for success rate (POMS-10, POMS-20, MPO-31/33).

- Review six- and 12-month follow-up records and statistical results. Do they reflect that graduates retain their jobs and are successful in employment?

- Check to see if there is a resource book for transitional support services. How is contact established with support service organizations? Is there a process to follow up on referrals provided to students?
R4. Transitional Support

Career Transition Services providers shall:

a. In each locale to which graduates return upon separation, identify resources and provide direct referral of graduates to community employment and/or social services that provide assistance with the following, at a minimum:

1. Housing
2. Transportation
3. Child care
4. Health care, including substance abuse support
5. Work clothing and tools
6. Food and nutrition
7. Financial planning
8. Counseling/mentoring
9. Job retention
10. Legal services

b. Provide ongoing counseling and transitional support to resolve job-related issues and to support job retention throughout the Career Transition Services period.

c. Provide ongoing transitional support assistance to graduates for continued employment.

Strategy:

➢ Review Case Notes, interview staff, and interview students to determine how transitional support services are provided.
R5. **Relocations**

a. This section outlines the procedure for transferring cases of graduates who are assigned to their initial CTS provider and then relocate to a new address covered by a different CTS provider. This may include one or more relocations within the graduate’s Career Transition Services period.

**Note:** The policy for crediting CTS agencies when CTS-assigned students relocate to a different service area is detailed in Appendix 501 Introduction and is also presented in table format in Appendix 501c, Attachment 3 (Crediting Chart for CTS Agencies When Students Relocate to a New Service Area).

This section does not apply to students who, at the time of separation, move to a location other than their home of record.

For the purposes of this section, current CTS providers will be referred to as the “sending CTS provider” and new CTS providers will be referred to as the “receiving CTS provider.”

b. Below is the procedure for transferring a case once a graduate has relocated. Although contact between CTS providers in preparation for a graduate’s relocation is encouraged, a transfer will not be official until there is receipt of confirmation that a graduate has physically relocated.

1. For relocations within regional boundaries, CTS providers will follow regional guidelines (see Appendix 501).

2. For relocations between regions, the sending CTS provider will transfer the case to the receiving CTS provider in the geographic area to which the graduate has relocated. Sending and receiving CTS providers will follow the process below:

   (a) The sending and receiving CTS providers will contact one another to coordinate the transfer. This contact will be documented in the Career Transition System (CTS) Case Notes (additional
information about CTS can be found in Section 4.5, R1, Recordkeeping).

(b) The sending or receiving CTS provider, whichever first confirms that the relocation has taken place, will submit a transfer request in the Career Transition System. The contact information of the receiving and sending CTS provider and the updated contact information of the graduate will be included in the comments section of the electronic transfer request in CTS. **The official date of the transfer is the date on which this electronic request form is submitted.** Upon submission, the CTS provider will document the date in CTS case notes.

**Note:** Upon receipt of a transfer, the receiving CTS provider will have 14 calendar days to confirm receipt of the case or file a rejection with their Regional Office. With seven calendar days remaining, the receiving CTS provider will receive a reminder notification to act on the transfer request. After the 14-day window closes, transfer requests will automatically be assigned to the receiving CTS provider. The date of the transfer remains the date that the transfer request was submitted electronically.

(c) The sending and receiving CTS providers will meet with the graduate either via phone or face-to-face, to introduce the receiving CTS provider to the graduate. All efforts will be documented in CTS case notes.

(d) The sending and receiving CTS providers will verify that the student has moved by making contact with the student at the new phone number and verifying the student’s updated contact information. Any additional contact information will be documented in CTS Case Notes.

(e) The sending CTS provider will ship the case file to the receiving CTS provider through a traceable method (e.g., Federal Express, United Parcel Service, and U.S. Postal Service Express Mail) with expected delivery to be the next business day. Date of post and receipt will be documented in CTS Case Notes.

(f) The sending and receiving CTS providers should report problems with the transfer of cases to their respective Regional Offices.

c. To align with the crediting CTS agencies where CTS-assigned students relocate to a different service area (see Chapter 5, Appendix 501 Introduction and Appendix 501c, Attachment 3), rejection of a case transfer by CTS providers will follow the procedures and rationale below:

1. **Transfer of cases occurring with less than 60 days remaining in the placement window cannot be rejected.** This is due to the fact that the OMS Crediting Policy does not hold the receiving CTS provider accountable for short-term placement measures. If the student is not placed by either provider, the sending CTS provider will be held
accountable. If the receiving CTS provider does place the student, it will receive credit for the placement and is responsible for six- and 12-month placement measures.

2. **Transfers of cases with 60 or more days remaining in the placement window may be rejected** if the receiving CTS provider’s Regional Office approves the rejection as satisfying one of the conditions below:

   (a) The receiving CTS provider is unable to contact the relocated graduate despite reasonable, documented attempts to do so.

   (b) The graduate is found to have not relocated to the CTS provider’s service area.

If the Regional Office finds that the rejection does not satisfy one of these conditions, the rejection will not be approved and the transfer will be deemed valid. For OMS crediting purposes, the official date of the transfer will remain the date that the transfer request was submitted electronically, despite the time it may have taken to adjudicate the rejection in the Regional Office.

Per the OMS Crediting Policy, for transfer of cases with 60 or more days remaining in the placement window, the receiving CTS provider will be held accountable for placement of the graduate. In cases where the graduate is placed by the sending CTS provider before the transfer, the sending CTS provider will receive credit for the placement and the receiving CTS provider may receive credit for any upgrades. The receiving CTS provider is responsible for six- and 12-month placement measures.

Strategy:

- Review the Standard Operating Procedure (SOP). What is office practice for transferring cases of graduates who relocate?
- Pull a 10% sample of cases to determine if any students assigned to the CTS agency were located outside the contract service delivery area.

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Rationale for Rating:

July 28, 2014
QUALITY INDICATOR(S)

Q1. All graduates have access to career transition services.

Strategy:

- Interview graduates to gauge their satisfaction with the career transition services they have been provided. Has the CTS Specialist been helpful? How? Is the CTS Specialist assisting students in fulfilling their individual employment plan? Has the graduate taken advantage of opportunities provided by the CTS Specialist? If necessary, has the CTS Specialist arranged for employability remediation? Community referrals?

- Call a sample of graduates, both placed and not yet placed, to determine support services received and what services are being provided to them.

- Review the job bank. Is it adequate to provide employment referrals to graduates in need of placement services?

- Interview or call the Center Director at centers for which the contractor has CTS responsibility. How is employer feedback relayed to staff? How often?

- Interview the CTS Specialist. How often does the CTS Specialist contact employers by phone/in person?

- Interview each CTS Specialist. What referral sources, resources, and services do they access the most? How are community resources developed? Has a current list of community resources (containing contact name, services offered, and phone number) been established? How are CTS Specialists kept updated regarding community resources? How are community resources kept updated regarding student needs and the Job Corps program? Have community resources accessed CTS Specialists for assistance? Has assistance been effective? How do the center and CTS provider work together to ensure quality career transition? How are employer partnerships established in the community? Is the CTS provider involved in Center Industry Council meetings as a resource for employment opportunities for graduates? How are employer contacts updated as a resource tool for employment opportunities? Does the CTS provider conduct new employer workshops in the community to market Job Corps? How successful are the workshops in establishing new employment opportunities?

- Interview each CTS Specialist. What systems are in place for obtaining employer feedback? How is employer feedback relayed to center staff? How often? How is it used?

- How often are centers contacted on the phone or in person to obtain information about the center? Who is visited during center visits?

- Are students contacted prior to separation from the center?
Interview each CTS Specialist. What job development strategies are used to support the placement needs of students at a livable wage and with a job training match?

Interview a sampling of community resources. Are they familiar with the Job Corps program? What services are offered? Are they the same services CTS staff are aware of? Are they satisfied with the relationship they have with the CTS staff?

Interview the CTS Manager. What systems are in place to ensure that job development occurs on a regular basis? Do CTS Specialists have job development goals? How often is the job bank updated? How often are employers in the job bank contacted? How are specific employers targeted for inclusion in the job bank? What trade poses the most difficulty for finding a job training match for a student? Are employers who hire employees with those career technical skills targeted?

Interview CTS staff to determine how systems are coordinated and if they feel empowered to implement innovative practices.

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Rationale for Rating:

Q2. Graduates progress toward career goals as outlined in their Personal Career Development Plan (PCDP).

Strategy:

- Pre-onsite: Review the POMS-10 report. Is the CTS provider’s performance meeting or exceeding the report card goals? Review a sample of ETA-678 forms. Are students placed in quality jobs that are aligned with their CTT area?

- Interview CTS Specialists. How is job readiness assessed? Is contact maintained with the student during center enrollment? Does the Specialist have a list of potential employers/referral sources? Are referrals to support services/community resources provided during the transition from separation to placement? How does the CTS Specialist conduct job development? Does the Specialist routinely coordinate with Career Technical Training instructors to identify placement opportunities and provide placement support? Can the Specialist provide documentation or examples of these efforts?

- Interview the CTS Manager. How does he or she incorporate employability concepts throughout the CTS process? How is local labor market information used? How are
workplace expectations discussed with students? How is remediation discussed? How are individual employment plans developed?

- Review graduate placement files for use of labor market information.

- Interview recent graduates by telephone. Did they reach their PCDP goals? Did Job Corps help them do so? How, or why not? Were they offered an opportunity for a job placement match? Are they now working in a job related to the training they received in Job Corps?

- Review placement records for quality placement. Do jobs represent opportunities for wage progression and a defined career path? Are there health and retirement benefits? Chances for further education and training through the employer?

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Rationale for Rating:

Q3. Graduates are able to retain employment and function independently.

Strategy:

- Interview National Training Contractors, CTS Specialists, and CTT instructors. Determine if graduate placements are being tracked. What percentage of graduates are not in the same job they obtained at graduation? For those who have changed employment or do not still hold their initial job and are unemployed, contact employers or review records to determine the cause. Were transition needs unmet? Was placement quality an issue? Wage?

- Interview graduates. Are they functioning well on the job and at home? If not, what needs do they have?

- Review graduate CTS contact records. Do case management notes indicate support and assistance to help graduates achieve independence? Are outcomes and needs detailed in the notes for follow-up? Have on-center CTS staff referred graduates appropriately to off-center CTS Specialists? In a timely manner?
Q4. Staff can describe the procedure for transferring cases between CTS providers once a graduate has relocated.
4.4 CAREER TRANSITION SERVICES FOR FORMER ENROLLEES

PURPOSE

P1. To assist former enrollees in securing initial placement in jobs, the military, or further education and training.

P2. To assist former enrollees in identifying and obtaining support services within the communities in which they live and work.

REQUIREMENTS

R1. Contact

Career Transition Services providers shall contact all assigned former enrollees at least every 30 days during the service period to reassess needs.

Strategy:

- Review the process of assignment of former enrollees. How is contact made?
- How are former enrollees being contacted after separation? How often?
- Review caseloads. Are they equally distributed so that counselors have enough time to contact their students?
- What methods are used to track former enrollee caseloads? How are staff held accountable for maintaining appropriate contact with former enrollees?

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Rationale for Rating:

R2. Placement Services

Career Transition Services providers shall (in accordance with Chapter 4, Section 4.2, Eligibility for Services):

a. Use labor market information and other resources to work with each former enrollee to develop placement strategies tailored to meet his or her individual needs and career goals.
b. Identify certification testing opportunities and collaborate with the former enrollee to support progress toward certification and/or licensure attainment.

c. Provide assistance to former enrollees in obtaining additional education and training opportunities and federal funding, as appropriate, to meet certification and/or licensure requirements.

d. Identify job leads and/or educational and training opportunities for which the former enrollee qualifies, and which meet the placement definition as specified in Exhibit 4-1 (Placement Definitions).

e. Develop job leads and provide referrals through use of Internet sources and direct contact with employers, local Workforce Investment Boards, Youth Councils, One-Stop Career Centers, unions, and apprenticeship programs.

Strategy:

➢ What services are provided and how long?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Former enrollees have access to initial placement assistance and career transition services.

Strategy:

➢ Call a sample of separated former enrollees, both placed and not yet placed, to determine support services received and what services are being provided to them.

➢ Interview former enrollees to gauge their satisfaction with career transition services that have been provided. Has the CTS Specialist been helpful? How?

➢ Ask former enrollees if a One-Stop referral was made and if it was successful in assisting them in finding employment.
Q2. Former enrollees are able to retain employment and function independently.

PRH 4.4 - Summary Rating

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4.5 DOCUMENTATION, REPORTING, AND VERIFICATION

PURPOSE

P1. To ensure accurate documentation of placements.

P2. To establish a uniform system for reporting placement transactions and provision of transitional support services.

REQUIREMENTS

R1. Recordkeeping

Centers and other designated Career Transition Services providers shall:

a. Track and document placement status, including updating student contact information, referrals, employment data, career progress, and attainment of certification(s) and/or licensure(s), using the Career Transition System (CTS), the approved Web-based application designed to record and track student placement information, manage student transition checks, and transfer students.

b. Release confidential graduate/former enrollee information only in accordance with procedures specified in Chapter 6, Appendix 601 (Student Rights to Privacy and Disclosure of Information).

c. Update information regarding outstanding transition payments. Notify students of the responsibility to cash the received check within 12 months of the date of separation or risk forfeiture of the payment.

d. Upon receipt of an undeliverable or returned check, make reasonable attempts to contact the graduate to obtain updated contact information necessary to reissue the check.

Strategy:

➢ How does staff track their cases? Do they check for adherence to students’ PCDP? How is confidentiality maintained? Where are records kept and who has access to these records? Ask for a copy of Records SOPs. Are records maintained according to national and SOP guidelines? Check records for required documents.

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Rationale for Rating:
**R2. Reporting**

Centers and other designated Career Transition Services providers shall:

a. For graduates that separated before October 1, 2009, report all graduate placements that meet the criteria specified in Exhibit 4-1 (Placement Definitions) and which occur within six months of separation from the Job Corps program. Once a graduate is placed within six months of separation, tracking and updating of placement status in CTS shall continue for 12 months following initial placement.

For graduates that separated on or after October 1, 2009, report all graduate placements that meet the criteria specified in Exhibit 4-1 (Placement Definitions) and which occur within nine months of separation from the Job Corps program. Once a graduate is placed within nine months of separation, tracking and updating of placement status in CTS shall continue for 12 months following initial placement.

b. Report all certification and licensure attainment of graduates, in addition to job placement.

c. Report all former enrollee placements in CTS that meet the criteria specified in Exhibit 4-1 (Placement Definitions) and which occur within three months of separation.

d. Report placement data according to the following timelines (as specified in Appendix 501 Introduction):

   1. **Date Reported** – the date the student first enters a placement during their initial placement window, regardless of whether they meet Job Corps’ placement definition, and regardless of when the CTS provider first learns of the student’s placement.

   Exceptions to the “date reported” policy are currently allowed in the following circumstances:

      (a) If the student enters a placement prior to their separation date, the “date reported” must be recorded as the date following the separation date.

      (b) If the student transfers from one CTS provider to another, the “date reported” cannot be earlier than the transfer date; therefore, if the student is placed prior to the transfer date, the “date reported” must be recorded as the date of transfer.

   2. **Date Placed** – the date the student meets the Job Corps definition for placement, and must be at least seven calendar days after the date reported in order to ensure that the placement criteria have been met.

   3. **Date Verified** – the date that documentation is received verifying the placement (including the hours, duration, and/or wage as appropriate). **Note:** In order to be considered a valid placement, the placement verification must...
be received and reported to the Job Corps Data Center via the CTS system within 90 days of date placed.

**Note:** If the placement is not considered valid because the verification is not received and the information entered into CTS within the above-specified time frame, the CTS provider will not receive the initial placement credit for this student. However, if the student is a graduate, and responds to the follow-up surveys, the CTS agency may receive six-month and 12-month placement credits.

e. Use Appendix 401, Job Corps Job Training Match (JTM) Crosswalk, to determine job training match placements.

**Strategy:**

➢ Who is responsible for entering data into the ETA Placement Form 678? Are results tracked and/or monitored? If so, by whom and how?

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**Rationale for Rating:**

**R3. Verification**

Centers or other designated Career Transition Services providers shall:

a. Verify and document 100% of initial placements; these placements will also be verified by a third-party source at 13 weeks.

b. Obtain placement verification documentation as specified in Exhibit 4-2 (Placement Verification and Documentation Requirements). Placements shall be considered to be verified when such documentation is obtained.

c. Ensure that verification is obtained and placement reported in CTS within 90 days after placement requirements have been met.

d. Maintain documentation of all placement verification for three years.

e. Verify certification and licensure attainment by requesting certificates, diplomas, or registry data.
Strategy:

- How is employment/placement verified? Who is responsible for the verification? How long are records maintained in the office? Do dates and wages match what was reported in the attachment?

- Review a 10% random sample of verified placements and supporting documentation. See the data integrity portion of the PAG (Appendix C-2: Data Integrity Audit Guide) for additional details.

- Review the contractor’s quality assurance plan. Does the process for entering and approving placement data match what is in the plan?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Placements reported are valid.

Strategy:

- Pre-onsite: Review Regional Office tracking for questionable placements. Have most been determined to be valid? If not, how many were determined to be invalid?

- Pre-onsite: Review MPO-31/33 reports to review the proportion of separated students that have not been placed.

- Interview or call a sample of employers to determine that placements are valid.

- Review placement files for documentation, including verification and tracking system for post-placement services and follow-up. Review records and logs to determine appropriateness and timeliness of contact with students.
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Rationale for Rating:

PRH 4.5- Summary Rating
Sample Consolidated Rating Matrix

As noted in the PAG Preamble, Regional Offices have flexibility in weighting the scores of Outreach and Admissions, Center, and CTS assessments based on a variety of factors. The Career Transition Period is inherently a post-center CTS responsibility, and the sample matrix provided is exclusively for CTS use. Regions have the flexibility to eliminate factors or add factors to their matrix.

Regional Directors and/or Division Chiefs should develop the matrix prior to the assessment so that the Review Team understands what areas need to be reviewed and how the ratings are to be established.

Below is a sample matrix for use on Job Corps CTS assessments.

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**Program Compliance Rating**

4.1 Career Transition Plan
4.2 Eligibility for Services
4.3 Career Transition Services for Graduates
R1. Contact
R2. Needs Assessment
R2. Placement Services
R4. Transitional Support
R5. Relocations
4.4 Career Transition Services for Former Enrollees
4.5 Documentation, Reporting, and Verification Process

**Program Quality Rating**

4.1 Career Transition Plan
4.2 Eligibility for Services
4.3 Career Transition Services for Graduates
4.4 Career Transition Services for Former Enrollees
4.5 Documentation, Reporting, and Verification

The matrix above places additional weight on PRH Section 4.3, Graduate Services. Regions have the flexibility to add specific requirements or quality indicators that they would like to emphasize as part of the assessment process. This matrix provides an example of how to adjust weights through emphasis on programmatic requirements.
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R6. Asbestos Operations and Maintenance Plan ............................................. 5.20-12
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November 10, 2011
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R9.  Respiratory Protection Plan .......................................................... 5.20-17
R10. Hearing Conservation Plan ............................................................ 5.20-20
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R12. Hexavalent Chromium Exposure Plan .............................................. 5.20-24
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### PRS Ratings Definitions and Scoring Scale

**Exceptional (8/9)**

Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.

**Very Good (6/7)**

Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.

**Satisfactory (4/5)**

Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.

**Marginal (2/3)**

Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.

**Unsatisfactory (0/1)**

Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.

---

**Note:** A glossary of acronyms is located at the end of the PAG Preamble.
5.0 OBJECTIVES

To enable Job Corps centers, Outreach/Admissions, and Career Transition Services providers to deliver quality services by establishing systems that ensure:

- Effective program organization and management
- Program integrity and accountability
- Staff professionalism and development
- Services are provided in a cost-effective and financially responsible manner

To ensure that Job Corps provides safe, clean, well-maintained facilities that are adequately furnished and equipped to meet student needs.
5.1 PROGRAM MANAGEMENT

PURPOSE

P1. To establish and maintain systems that support the admission, career preparation, career development, and career transition of students.

P2. To monitor and track operations and outcomes to ensure program accountability, integrity, performance, and quality.

REQUIREMENTS

R1. Goal Achievement

Centers operated by contractors and agencies, and OA/CTS contractors shall establish:

a. Procedures to develop and clearly communicate goals to staff and students.

b. Procedures to hold staff responsible for achieving communicated goals.

Strategy:

- Review minutes of senior staff meetings for past six months, review staff meetings for every department, determine methods of communications. Check for follow-up. Are there defined goals? How are staff held responsible for these goals?

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Rationale for Rating:

R2. Quality Assurance

Centers operated by contractors and agencies, and Outreach and Admissions/Career Transition Services (OA/CTS) contractors shall:

a. Establish procedures and conduct periodic self-evaluations and audits to ensure integrity, accountability, and prevention of fraud and program abuse. The Quality Assurance Plans and Procedures shall be submitted annually to the Regional Office for approval as outlined in Exhibit 5-2. Approval of the Quality Assurance Plan shall be based upon:

1. The extent to which the oversight, monitoring, and assessment plan will provide a reasonable assurance of contractor/agency compliance and quality.
2. The extent to which the contractor’s/agency’s data validation system ensures the accuracy and integrity of student outcomes and financial data.

3. The extent to which the contractor’s/agency’s quality assurance activities track and ensure that corrective action is taken to maintain outcomes and quality standards.

4. The degree to which the contractor/agency documents the results of inspections, tests, audits, and assessments.

b. Establish systems to ensure performance is accurately tracked and reported and necessary corrective actions are taken to achieve the performance outcome goals and quality standards established by the National Director of Job Corps and contained in Appendices 501a through 501d.

c. Conduct annual comprehensive assessments of center or OA/CTS operations.

Job Corps Regional Offices shall:

a. Schedule and conduct comprehensive program assessments of OA, Job Corps center, and CTS operations at least every 24 months.

b. Conduct audits of approximately 10% (Contracted On-Board Strength [OBS] or Average CTS caseload) of all student records associated with performance measurements during center and CTS program assessments, using targeted samples generated by the National Office of Job Corps.

c. Document the results of program assessments and audits and furnish a copy of the assessment report to the National Office and the contractor or agency. If excessive reporting problems are present, the extent of misreporting shall be brought to the immediate attention of the National Office.

d. Assess liquidated damages from contractor’s base/incentive fee for instances of misreporting of data based on the following schedule:

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<th>Description</th>
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<td>Invalid HSD/GED Credits</td>
<td>$500 each</td>
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<tr>
<td>Invalid Vocational Completion Credits</td>
<td>$750 each</td>
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<tr>
<td>Artificially Extending Enrollment and/or Invalid Leave Days</td>
<td>15% of the Student Year Cost (SYC) per day.</td>
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<td>The amount is calculated as annual operating budget/planned SYs x 15% x Number of Unexcused Days.</td>
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<tr>
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Note: The interpretation and specific application of “liquidated damages” to agency-operated Job Corps centers is currently being addressed by the Departments of Labor and Agriculture as part of a collaborative effort to update, revise, and consolidate the two existing Interagency Agreements. When this process is concluded, the PRH will be updated accordingly.

e. Require the operator to post the liquidated damages to the fee line applicable ETA 2110. The region will request an Annual Advanced Procurement Plan/Financial Operating Plan (AAPP/FOP) change to document the assessment or damages and recover the funds through a contract modification. Misreporting of data by agency operated centers shall be reported to the National Office of Job Corps and the respective agency for corrective action.

Notify the National Office of Job Corps and the Job Corps Data Center (JCDC) to remove invalid credits (General Educational Development/High School Diploma [GED/HSD], CTT Completion, and Placement) from the Outcome Management System(s) (OMS).

Note: Invalid credits will be removed from each measure that is affected regardless of the report card (OAOMS, OMS, POMS, CTT Training Report Card [CTTRC]) or contractor responsible for the error (OA, center, or CTS). For example, where verification of a HSD has been invalidated, credit would be removed for the GED/HSD Attainment measure. In this instance, if the HSD was the sole determinant of the student’s graduate status, he or she would also be removed from the pool for any placement-related measure(s) in the OMS, POMS, and CTTRC report cards. Similarly, a credited placement that has been found to have been misreported by a CTS provider would lead to the removal of the student from the placement pool of both the CTS and the center OMS report cards. Both scenarios hold true whether the center operator and the CTS provider are separate, or one and the same.

f. Contracting Officers must exercise discretion when assessing liquidated damages when such action may not be appropriate where an error or omission occurred or when the action was careless or a result of an innocent mistake. This is particularly true if they were improperly recorded, but the student outcome was likely achieved (e.g., a CTT completion, a GED credit, or a placement credit that was incorrectly reported, but there is verification that the student actually earned the credit).

g. When a Contracting Officer becomes aware of apparent fraud, the matter should be thoroughly investigated. If the investigation leads the Contracting Officer to conclude there is a likelihood of fraud, it should be referred to the Regional Office of the OIG by filing an incident report. The Incident Report Form can be found at: http://www.internal.doleta.gov/forms/Documents/IncidentReport.dot.

In addition to filing the report, inform the OIG of the actions intended by the Contracting Officer to address the incident. Make it clear that they intend to take these actions, unless the OIG specifically instructs them not to do so. Proceed with contract enforcement, unless otherwise directed.
Strategy:

- Review corporate involvement and how they support the contract (e.g., corporate assessments, site visits, etc.). Read CDSS Plan to ensure all items are included.

- Determine if the operator has developed and implemented a Quality Assurance Plan. Validate if the operator is following the plan. Ask staff to identify problem-solving techniques used. Review corrective action plans and monitoring practices to ensure resolution has occurred.

- Interview management staff to determine if the organization has a self-assessment plan. Determine if internal reviews have been conducted within the last year. Request documentation. Determine if the organization has a standardized procedure to support internal assessments (assessment or review guide). Does a standard operating procedure (SOP) exist? Does the policy/procedure include a process for following up on the self-assessment and any past DOL, corporate, or agency review deficiencies? Determine if corrective actions have been implemented and if monitoring of corrective actions is ongoing. Determine who is responsible for ensuring deficiencies are addressed in a timely manner.

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**Rationale for Rating:**

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Center contractors, agencies, and OA/CTS contractors shall:

a. Establish standard operating procedures (SOPs), as shown in Exhibit 5-1 (Standard Operating Procedures), and submit them to the Regional Office for approval within 90 days of contract award. Updates and revisions shall be submitted as changes occur.

b. For agency operated centers, provide up-to-date SOPs, as shown in Exhibit 5-1, with annual plans and amendments to SOPs submitted to the Department of Labor (DOL) Regional Office for approval by June 1 for the upcoming program year.

c. Career Development Services System Plan

Each Job Corps center and each OA/CTS contractor shall:

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November 10, 2011
1. Develop a Career Development Services System (CDSS) Plan. The plan shall include:
   (a) An overview of the contractor’s/agency’s role in each phase of CDSS, as appropriate for each contractor/agency.
   (b) A description of how services will be delivered and coordinated with other partners for Outreach/Admissions, Career Preparation, Career Development, and Career Transition Periods.
   (c) The requirements shown in PRH Chapters 1-4, as applicable.

2. CDSS plans shall be submitted to the Regional Office for approval within 90 days of contract award. Agency centers shall submit the plan for approval when required by the DOL Regional Office. Approval shall be based on a determination that all required parts of the plan are in place and that the plan is consistent with the overall Regional CDSS plan.

3. CDSS plans shall be kept current. Revisions shall be submitted to the Regional Office for approval prior to implementation.

Strategy:

- Check to see when SOPs were submitted and approved.
- Verify if the CDSS Plan includes a description of the operator’s role in each phase of CDSS.
- Review requirements outlined in other sections of the PRH regarding plan content.

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Rationale for Rating:

### R4. Reporting

Center operators, agencies, and OA/CTS contractors shall submit reports in accordance with Exhibit 5-2 (Plan and Report Submission Requirements).

Strategy:
Using Exhibit 5-2 (Plan and Report Submission Requirements), request documentation of submission of a sample of required reports.

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Rationale for Rating:

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**R5. Records and Reports Maintenance**

Center operators, agencies, and OA/CTS contractors shall maintain records and reports for three years. Records of disclosures of protected health information shall be kept for six years. Exceptions to this retention period shall be communicated by the National Office of Job Corps on a case-by-case basis.

Strategy:

- Check SOP for this procedure and review process with assigned person. Are records maintained for the required three years?

- Determine how records are secured and student personal information is safeguarded in accordance with personally identifiable information (PII) requirements. Determine if the location of records is secure, safe, and access-controlled.

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Rationale for Rating:

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**QUALITY INDICATOR(S)**

November 10, 2011
5.1-7 PAG Chapter 5:  Management

Q1. Required Job Corps elements are in place and functioning at a level that meets students’ basic needs.

Strategy:

➢ Pre-onsite: Review applicable OMS and MIS reports to determine if goals are achieved.


➢ Interview community leaders and employers. Do they perceive that the center wants and uses their feedback? Are they eager to give feedback? Do they see it as a burden? What evidence is available to support center incorporation of community and employer feedback into center practices and polices?

➢ Determine what systems are in place to ensure students fully participate in all phases of CDSS and center life activities that develop and allow practice of skills needed for sustained employment.

➢ Assess systems in place to ensure training meets the needs of students and the current requirements of the labor market.

➢ Assess centerwide participation in CDSS. Do CDSS principles and practices permeate center activities? Does center culture support CDSS? How are workplace terminology and employability concepts and standards incorporated into center practices, policies, and procedures? What systems are in place that incorporate workplace expectations into all center programs? Are the systems effective?

➢ Assess the center’s organizational structure. Does it support effective delivery of CDSS functions? Compare the organization chart to the FMS Staff Vacancy Report for both the following year and current month to determine adequacy of staffing.

➢ Interview the Center Director and management team. Is there an Industry Council in place? What role does the council play in defining training program requirements for curriculum and/or course content and changes in career technical training programs?

➢ Determine how center management supports WBL. What systems are in place to ensure consistent monitoring of WBL sites? When did management last visit a WBL site? What was the purpose of the visit?

➢ Determine if center practices are in accordance with the CDSS plan.

➢ Determine how management and the general culture of the center support employability and transition to the workplace.
Q2. Staff can describe goals, performance expectations, and standards, and articulate how their individual performance contributes to the overall accomplishment of Job Corps goals.

Strategy:

- Interview staff across center. Can they articulate program goals, performance objectives, and standards? How do individual goals contribute to accomplishing program goals? Ask for an example of an individual goal and how that goal has been achieved. Does training contribute to the staff’s ability to achieve individual goals? Does each manager have a copy of the center’s CDSS plan?

- Interview center managers. How are departmental goals communicated to staff? Elicit examples. Review staff performance appraisals to determine if performance goals are included and measured.

- Interview the Center Director. How are center goals and objectives communicated to staff and students? How are they connected to staff training and staff evaluation?

- Interview staff or conduct a staff survey to determine the depth of their knowledge relating to program components. Do they know what CDSS is and how it relates to program outcomes? Do they understand the connection between what they do and how the performance statistics are affected? Have they received a copy of the most recent center self-assessment and the regional and/or corporate assessment for their respective program areas?

- Interview a sample of staff or conduct a staff survey to determine the depth of their knowledge relating to OMS and other performance measures. Do they know center standards and goals? Can key staff translate those goals into numbers of students and how they are related to CDSS principles? Do they understand the connection between what they do and how it supports career development? Do the individual staff members have defined goals?
Q3. Communication, teamwork, and cooperation are at a level to accomplish routine tasks, assignments, and responsibilities.

Strategy:

➢ Interview the Center Director/Project Director. How is CDSS communicated to all staff? Does the organization have a CDSS Plan? How was it developed? Who participated? What role do students play?

➢ Observe/attend meetings for various departments or work units to observe levels of and effectiveness of collaboration. Are the issues discussed focused on career development? How is the feedback used? Does the organization have a procedure to ensure that these types of meetings take place? Are staff ideas sought and acted upon? Ask for examples.

➢ Determine if counselors, teachers, instructors, and residential advisors have regular collaborative meetings with two or more departments represented. How often? Or are most meetings intra-departmental? What is a typical agenda of collaborative meetings? Give an example of a collaborative meeting that was called for a specific purpose, such as development of the PCDP format, etc. When was the last meeting that included more than one department that was not an all-center staff meeting?

➢ Determine if multiple departments are represented in strategy meetings for such things as curriculum integration, CDSS implementation, and other special issues or initiatives. Are both management and line staff present? Interview staff. What special teams or projects have they worked on in the last year? Who else participated? What was the outcome? How did they communicate results to the rest of the center? Did the Center Director support them in that process?

➢ Determine if the center or OA/CTS contractor has regularly scheduled meetings for all departments to ensure communication occurs. Are minutes kept for all management, departmental, and staff meetings? What type of published information is provided to all staff (e.g., staff minutes, safety information, human resources concerns)?
Interview students. Where do they go if they have a concern about their career development? What usually happens? What do they do if they do not get an answer? Does their career technical training instructor know when they are not doing well in academic classes? Do academic and career technical training instructors support student career development plans? Does their counselor know when they have issues in progress toward independent living? If so, how do they know? Do students perceive staff as interactive and working together across departments?

Interview managers across center. How do they obtain staff input and how does this input affect decisions? How is staff innovation and creativity encouraged? How do managers recognize and reward positive behavior and performance? How is staff morale gauged? How would managers rate staff morale? Why?

Interview staff members across center. Are they given an opportunity to provide input into decisions? When? Is their opinion valued? How? Are creativity and innovation encouraged? How is their positive behavior and performance rewarded and recognized? How would they rate staff morale? Why?

Find out how often staff and students interact with the Center Director. In what context are career development principles discussed (e.g., walking around center, only in formal staff meetings, once per week to review departmental progress)?

Interview management and departmental staff across center. What formal systems are in place to support communication between departments to ensure career development principles are met? Are systems effective? Ask for examples of forms, written procedures, staff meeting schedules, minutes, and agendas.

What is an example of a career development challenge that has been addressed recently through a formal process? Does the Center Director see the formal communication process differently than staff? How?

Interview staff. How do they access the career development processes? Do all staff receive meeting minutes and meeting agendas? Do they attend all staff meetings and their own departmental meetings? Do they attend the meetings of other departments? Is CDSS the focus of these discussions?

Interview staff to determine the extent to which center systems are coordinated and how departments interact to support career development. Do interviews suggest turf issues? Ask staff how their departments interact with other departments and when/what problems might exist? Do staff believe their ideas for innovation in career development and student services are welcome and do they feel empowered to implement innovative practices? Is informal communication active and encouraged by management?
Q4. Through self-assessments, centers and OA/CTS contractors maintain quality operations by identifying and correcting areas not meeting minimum expectations/outcomes.

Strategy:

- Interview staff. Do supervisors/managers visit their classrooms? Do staff use their input to improve their programs?

- Review employee performance appraisals as they relate to appropriate behavior and staff/student interaction.

- Interview management staff to determine what steps have been taken to improve results in their areas as they relate to the CDSS Plan. Find out how performance monitoring is tracked. If a program is currently deficient, is there a corrective action plan?

- Review staff performance appraisals to see if CDSS activities are a measurable factor and if the appraisal is appropriately tailored to encourage each staff member to support CDSS. Do staff incentive plans or bonus systems reflect objectives related to CDSS?

November 10, 2011
PRH 5.1 - Summary Rating

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5.2 PERSONNEL

PURPOSE
P1. To recruit, hire, and retain qualified personnel to carry out all program components.
P2. To ensure that staff work in an environment that is fair and nondiscriminatory.
P3. To ensure the proper screening, training, and supervision of volunteers.

REQUIREMENTS

R1. Organization and Staffing
a. Center operators and Outreach and Admissions/Career Transition Services (OA/CTS) contractors shall:
   1. Develop and submit a staffing plan (organizational chart) to the Regional Office for approval within 90 days of contract award.
   2. Submit current position descriptions for Regional Office approval within 90 days of contract award.

b. Agency operators shall develop and submit a staffing plan (organizational chart) to the National and Regional Offices annually.

Strategy:

➢ Obtain copy of staffing plan and check date of approval. Look for approved organizational chart and salary chart.

➢ Compare the staffing plan with the Financial Management System (FMS) Staff Vacancy Report to determine adequacy of staffing.

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Rationale for Rating:

R2. Staffing Ratios

Center operators shall comply with the following staffing requirements:

a. The student-to-teacher ratio for instructional and training activities shall be 15:1, except for career technical training (CTT) programs specifically authorized for...
lower ratios as specified in Chapter 3, Exhibit 3-3. Student-to-teacher ratios may not be altered except with the written approval of the National Office. For purposes of defining training slots, one full-time student is equivalent to two training slots. Therefore, the 15:1 student-to-teacher ratio translates to a 30:1 slot-to-teacher ratio.

b. Student-to-staff ratios for nationally contracted training programs shall be in accordance with contract provisions.

c. Minimum staffing levels for health programs are specified in Chapter 6, Exhibit 6-5 (Center Health Services Staffing Requirements).

d. All other staffing levels shall be based on center configuration and approved by the Regional Office.

Strategy:

➢ Compare staffing ratios to OBS. Do they meet requirements?

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Rationale for Rating:

R3. **Personnel Policies**

Center operators and OA/CTS contractors shall:

a. Develop and implement personnel management policies to include staff hiring, supervision, evaluation, conduct, and disciplinary procedures.

b. Define standards for acceptable and unacceptable behavior between students and staff that protect individuals from exploitative, coercive, and traumatic experiences. Ensure that center rules for acceptable and unacceptable behavior are equally understood and applied to all staff. These rules, which should be included in the Employee Handbook, should provide a clear explanation and rationale for appropriate and inappropriate behavior, and identify the consequences for unacceptable staff behavior. Staff should know the legal consequences of unacceptable behavior, if applicable.

c. Establish labor-management relations in accordance with agency guidelines for federally operated centers, and in accordance with the provisions of the National Labor Relations Act for contractors. The U.S. Department of Labor shall not undertake conciliation, mediation, or arbitration of organizations, nor may Job
Corps pay legal or other fees generated by such disputes as direct costs against contracts.

d. Develop and implement volunteer management policies to include volunteer screening, training, and supervision. At a minimum, plans should include background checks for all volunteers in accordance with state laws, and plans to ensure volunteers are covered by the contractor’s liability insurance while they are performing their assigned tasks.

Strategy:

➢ Ask for copy of Employee Handbook.

➢ Ask for copy of volunteer management policies. How are volunteer background checks documented? Are volunteers covered by the contractor’s liability insurance?

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Rationale for Rating:

**R4. Staff Qualifications**

a. Center and OA/CTS contractors shall ensure that all staff hired meet the minimum qualification levels specified in Exhibit 5-3 (Minimum Staff Qualifications).

b. Center and OA/CTS contractors shall request written approval or waivers from the Regional Director for the following:

1. Hiring of staff who do not meet minimum qualifications as specified in the approved position descriptions, in which case a professional development plan must be submitted and updated annually

2. Hiring of relatives of current staff members

3. Appointment, continued assignment, or change in employment status of the Center Director, Project Director, or senior staff (i.e., all supervisory personnel who report directly to the Center Director)

4. Where there is a need to pay individuals at rates higher than indicated in the approved salary matrix

c. Regional Offices shall not grant a waiver if it would negatively impact the center’s eligibility for accreditation or its ability to produce high school graduates.

November 10, 2011
d. Agency operators shall advise the Regional Office of changes in employment status of Center Directors and senior staff.

Strategy:

- Check position descriptions and review staff qualifications; check for waivers and professional development plans; check for nepotism waivers.

- Review the process for waivers of required staff qualifications. Do staff who lack qualifications have a documented plan for achieving them? For instance, are instructors without credentials enrolled in classes to earn them? Are teachers without appropriate certification enrolled in programs to obtain it? Review personnel files of those who were hired with Regional Office waiver of position qualifications. These may include provisional requirements for enrollment in appropriate education or training programs within a certain time period. Ensure those employees are following the required plan.

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Rationale for Rating:

**R5. Staff Coverage**

Center operators shall provide for coverage of staff absences for those positions with direct staff/student interaction. Use of students or volunteers for this purpose is prohibited. All substitutes shall be trained in safety procedures.

Strategy:

- Get list of vacancies. Are substitutes trained in safety procedures?
R6. **Staff Performance Appraisal**

Center operators and OA/CTS contractors shall develop a staff performance appraisal system that allows for documentation of staff competence, to include:

a. Maintaining staff requirements specified in Exhibit 5-3.

b. The areas listed in Exhibit 5-4.

c. Staff’s modeling, mentoring, and monitoring each of the eight Career Success Standards.

d. Support of students’ career development goals, the zero tolerance policy, and student placement efforts.

**Strategy:**

- Review employee job descriptions, including required qualifications. Are they appropriate and do they include PRH requirements for specific positions? Are staff regularly evaluated based on performance in the functional areas of their jobs?

- Review performance appraisals. Do they model employability standards and are they consistently administered? Check for gaps in monitoring periods.

- Observe staff in their work environments. Do staff members have a positive attitude and appear to enjoy their jobs? Do you see staff acting as models, mentors, and monitors to fellow staff?

- Observe staff and student interactions. Do you see positive staff and student interactions? Do you see staff acting as models, mentors, and monitors to students?
R7. **Equal Opportunity/Civil Rights**

Center operators and OA/CTS contractors shall:

a. Provide equal opportunity for all employees without regard to race, religion, color, national origin, gender, citizenship, disability, political affiliation, or belief. Sexual harassment is prohibited in Job Corps. Discrimination is prohibited in all contracts, grants, and programs funded by the Department of Labor.

b. Provide prompt, fair, and impartial consideration of discrimination or other civil rights complaints through an established and approved grievance system.

c. Submit an affirmative action plan to the Regional Office for approval within 90 days of contract award in accordance with Appendix 602 (Civil Rights and Nondiscrimination).

d. Submit a plan to employ and advance the employment of veterans to the Regional Office for approval within 90 days of contract award in accordance with Public Law 107-228 HR 4015, Section 2. 4215 (priority of service for veterans in Department of Labor job training programs), Part b (Employment of Veterans with Respect to Federal Contracts).

Strategy:

- Review the center EEO plan. Review EEO complaints against staff. Are there many complaints? How has the center responded? Are the same staff involved and how are disciplinary actions handled? Are procedures for filing complaints or grievances clearly posted? Do staff know how to appropriately exercise their civil rights (e.g., are classes on equal opportunity, diversity, and sexual harassment prevention provided as part of staff training)?

- Review the affirmative action plan. Was the plan approved? Did the plan include areas of underrepresentation? Are action plans developed? What is the progress of the action plans?
QUALITY INDICATOR(S)

Q1. Staff display appropriate behavior and demonstrate appropriate interpersonal skills and are able to work effectively with applicants, students, employers, co-workers, and the public.

Strategy:

- Review employee performance appraisals as they relate to appropriate behavior and staff/student interaction.
- Observe staff/staff and staff/student interaction and behavior. Visit the classrooms, dorms, cafeteria, and recreational areas to assess interaction with students. Is the interaction professional, appropriate, and respectful? Is employable behavior modeled by staff and expected of students?
- Interview staff. Can staff articulate how their actions affect students’ understanding of workplace expectations (e.g., public displays of affection)? Are expectations for staff consistent with expectations for students?
- Review the staff training plan. Has it been submitted to the Regional Office as required? Was it approved? If not, how has the center adjusted it? Review staff training records. Do they indicate staff are receiving the required training within the time frames established in the PRH? Is required staff training tracked to ensure all staff meet minimum training requirements established by the PRH? Are new staff provided the required training within the first 180 days? Review the training schedule. Is it flexible enough that all staff can access required training when needed?
- Review staff dress and behavior policies, including sanctions for noncompliance. Review any staff discipline records and determine if policies are followed. Assess the last review concerns and determine if those related to staff dress and behavior were addressed formally.

November 10, 2011
Q2. Students perceive that staff are caring and responsive to their needs.

Strategy:

- Interview students in a focus group. Do students feel that staff treat them appropriately? If not, why? Ask them to give examples of staff behavior that feels supportive and staff behavior that does not.

- Visit the classrooms, dorms, cafeteria, and recreational areas to assess staff interaction with students. Is the interaction professional, appropriate, and respectful?

- Interview managers across center. How is diversity encouraged? (Look for diversity in staff and posters and pictures that reflect the Job Corps population in terms of ethnicity, gender, age, etc.)

Q3. Volunteers are screened, trained, and supervised according to state laws and are appropriately utilized.

Strategy:

- Interview Human Resources Manager. Are there any state laws regarding screening, training, or supervision of volunteers? How are volunteers utilized on center?

- Interview volunteer in a focus group. What types of training do volunteers receive? How are they communicated with on training availability? Who supervises their work on center?

- Review personnel records. How are volunteers recruited? How are volunteers screened?
### Rationale for Rating:

### PRH 5.2 - Summary Rating

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5.3  STAFF TRAINING

PURPOSE

P1. To ensure staff acquire and maintain the skills necessary to perform their job duties and responsibilities and serve as role models for students.

P2. To allow staff the opportunity for professional growth and upward mobility.

REQUIREMENTS

R1. **Staff Training Plan**

   Centers and OA/CTS contractors shall:

   a. Submit an annual Staff Training Plan for approval by the Regional Office.

   b. Include, at a minimum, the topics and frequencies specified in Exhibit 5-4 (Required Staff Training).

   c. Submit a Professional Development Plan for all staff on waivers.

Strategy:

- Review training plan and check to see if staff are trained according to plan. Are there professional development plans for staff on waivers?

- Review the New Staff Orientation plan/process to determine the adequacy of preparation for staff to assume new job responsibilities.

- Review staff training processes. Do staff training opportunities include CDSS, curriculum development, and curriculum integration, and address different learning styles? Are Staff Training Plans individualized? Are some training activities interdepartmental? For instance, do CTT instructors sometimes participate in curriculum development training in collaboration with academic instructors? How is that process facilitated? Who is responsible for reviewing Staff Training Plans to ensure continuous improvement in instructional delivery? How often are they reviewed? Do they reflect a commitment on the part of center management to implement CDSS?

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Rationale for Rating:

November 10, 2011
R2. **Staff Training Content**

Centers shall include, at a minimum, the following:

a. Five hours of annual training in adolescent growth and development for all staff. Topics could include effective communications, anger management, sexuality, suicide prevention, behavior management system, Zero Tolerance Policy, appropriate staff/student boundaries, sexual assault prevention and response, sexual harassment and related social skills training, intervention techniques, and safety issues.

b. An additional five hours of annual training designed to enhance each employee’s professional development. Such training may include professional seminars, conferences, and classroom training provided on or off center, in-service training, and technology skills training.

Strategy:

- How is training provided and documented in adolescent growth and development and professional development?
- Who provides training and what happens in case of missed training sessions?
- How is training scheduled and provided to cover all shifts (prime, overnight, weekends, etc.)?
- Review the staff training budget to determine if training resources are equitably provided for each department and staff member.

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Rationale for Rating:

R3. **Documentation**

Centers and OA/CTS contractors shall maintain up-to-date records of training completed by each employee.
Strategy:

- How is training monitored? How do they ensure training is conducted for any staff that missed scheduled training?

- Review staff training records to determine if staff members receive appropriate training in safety practices. Is the training current?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Staff demonstrate the knowledge and skills necessary to perform their job functions (duties).

Strategy:

- Review teacher/instructor training. Are they participating in any community or local school or college training offerings? Does the center have any training agreements with those entities? Are career technical training instructors involved in state career technical training offerings?

- Interview staff and ask them to describe the last training they attended. Was it effective? Did it assist them in serving students? How long does the average training last? Is it long enough? What kind of training do they feel is most important, and what kind would they like to add to the training plan? What would make training more effective?

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Rationale for Rating:

November 10, 2011
Q2. Staff interact appropriately with students and serve as positive role models for students and other staff.

Strategy:

- Review standards of conduct for staff to determine if corporate structure advocates disciplinary action for inappropriate behavior or unacceptable interpersonal conduct. Review recent staff disciplinary actions. Was follow-up necessary? Was it done?

- Interview staff. What do they do to support/encourage employability concepts among students? Program completion?

- Observe staff. Do their dress, language, and work habits role model employability skills?

- Interview managers across the center. What employability skills are staff expected to model? How are staff informed of these skills? Does staff training regarding employability and/or workplace professionalism occur? How do managers enforce expectations for modeling employability skills?

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Rationale for Rating:

November 10, 2011
5.4 PERSONAL SAFETY AND SECURITY

PURPOSE

P1. To protect the personal safety and security of students, staff, and property on center at all times.

P2. To protect students’ rights and guarantee privacy and protection from unreasonable search and seizure.

REQUIREMENTS

R1. Campus

Center operators shall establish rules regulating the entry, exit, and conduct of persons who seek access to the campus.

Strategy:

➢ Check for sign in/out procedures; review log to ensure closed system.

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Rationale for Rating:

R2. Cooperation With Local Agencies

Center operators shall develop and maintain written cooperative agreements with federal, state, and local law enforcement agencies regarding management and jurisdiction for illegal activities.

Strategy:


November 10, 2011
R3. **Prohibition of Firearms**

Center operators shall prohibit the presence of firearms except in the following circumstances:

a. For security of student payroll by non-center staff.

b. For law enforcement personnel conducting routine law enforcement duties. If employed by the center, law enforcement personnel shall not carry firearms in the course of that employment.

c. Personal firearms kept in on-center staff housing for personal use.

Strategy:

➢ Are there firearms on center? How are they stored?

R4. **Unauthorized Goods**

Center operators shall ensure that the following unauthorized goods are not permitted on center:

a. Firearms and ammunition

b. Explosives and incendiaries

November 10, 2011
c. Knives with blades longer than two inches  
d. Homemade weapons  
e. All other weapons and instruments for which the primary use is to inflict personal injury  
f. Drugs and drug paraphernalia  
g. Stolen property  
h. Alcohol  
i. Tobacco for minors  
j. Any other items that are illegal under state law

Strategy:

➢ Review unauthorized goods log. How are items stored? Are all items above included in unauthorized goods log?

➢ Review the center’s Significant Incident Report (SIR) and Unauthorized Property Listing to determine what items may have been given to local law enforcement.

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Rationale for Rating:

**R5. Student Notification**

Center operators shall notify all students of the center’s policies and procedures regarding unauthorized goods, searches, and seizures.

Strategy:

➢ How are students notified of this policy and procedures? Are presentations made during CPP?
R6. Search and Seizure

Center operators shall conduct searches and seizures only in the following circumstances:

a. General inspections of dorm rooms, lockers, and other center facilities may be conducted periodically.

b. Searches for unauthorized goods may be conducted only when the Center Director believes such goods are being hidden on center. The reasons for the search must be documented.

c. The scope of search may be no wider than what is necessary to accomplish the specific purpose of the search. Unauthorized goods found as a result of a search must be confiscated.

d. A search of the person of an entire group of Job Corps enrollees is prohibited when the information in the possession of Job Corps officials indicates that only some members, or less than all members, of the group are in possession of contraband that is prohibited on center property.

e. Job Corps shall not conduct strip searches of students. If the Center Director believes a strip search of a student is necessary, local law enforcement authorities must be contacted and requested to perform the search.

f. Searches for evidence of crime may be conducted for evidence in criminal prosecution. These must always be done by a law enforcement officer with a search warrant, except when delay would endanger the physical well-being of students.

Strategy:

- Check to see how many searches and seizures have occurred and how they have been documented.
- Review the center’s SIR log and Unauthorized Property Listing to determine if unauthorized items have been found.
R7. **Disposal of Unauthorized Goods**

Center operators shall dispose of unauthorized goods as follows:

a. Stolen property must be returned to its rightful owner.

b. Narcotics must be stored and disposed of according to agreements negotiated by the center and the appropriate local law enforcement agency.

c. Confiscated weapons (including firearms) must be reported and disposed of according to agreements negotiated by the center and the appropriate local law enforcement agency. The center must maintain a list of weapons reported to the local law enforcement agency, giving the student’s name and Social Security Number and the serial number, type, make, and model of the weapon.

Strategy:

- Check unauthorized goods log to see how items were stored and disposed of.

R8. **Use of Physical Restraint and Isolation**

Center operators shall:
a. Limit use of physical restraint to only those situations that seriously threaten persons or property. Ensure that no student is restrained for more than one hour without at least verbal consultation and approval from a physician. Staff may not use handcuffs, mace, or pepper spray (or any derivatives) on students.

b. Use on-center isolation facilities for temporary segregation of students from their peers only when behavior constitutes an immediate threat to themselves, other persons, or property.

A student placed in an isolation facility must be observed every 15 minutes and this observation must be documented on a signed log giving the exact time of observation and the signature of the staff member conducting the observation. Isolation may not exceed 12 hours unless accompanied by a statement from the center physician that the isolation is not medically prohibited.

Strategy:

➢ Does the center have an SOP for use of isolation? What circumstances warrant isolation? Is there an isolation room? Check log for when students enter and exit. If student is in isolation longer than 12 hours, check for approval by RO and/or medical personnel. Make up a chart detailing the number of incidents over the past three months to see if there is a trend.

➢ Determine how the center isolates students if no isolation room is available.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Documentation of searches, seizures, and isolations reflect complete, thorough, timely, and appropriate actions.

Strategy:

➢ Review documentation of searches, seizures, and isolations. Does it reflect complete, thorough, timely, and appropriate actions? Are searches limited to only the scope needed based on the incident?
➢ Interview students concerning the methods the center staff use to search students. How do students view the necessity and manner of search and seizure incidents?

➢ Review documentation of center searches. Is there evidence of group searches? Review search requests and SIRs to ensure this is not the case.

➢ Review records of confiscated articles. Are they being disposed of properly as required in PRH Section 5.4, R7? Are there records that document disposal?

➢ Review the center’s agreement with local law enforcement agencies. Does it include agreements for disposal of narcotics and confiscated weapons? Do records indicate those agreements are followed? Is there also an agreement that provides for local police to do strip searches of students when events indicate a need?

➢ Find out if law enforcement agencies are aware of the juvenile status of some Job Corps students. If so, do they respond appropriately, as they do with local juveniles, with juvenile system detectives, prosecutors, and community service officers when appropriate?

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Rationale for Rating:

Q2. Cooperative working relationships exist between the center and law enforcement agencies.

Strategy:

➢ Contact the local law enforcement agencies and ask how their relationship is with the center. Are there written memoranda or agreements? Are local law enforcement agencies represented on the Community Relations Council? Who are the identified key contacts? Under what circumstances will local law enforcement agencies come to the center? Is their response timely? A review of SIR information could give a good indication of the type of assistance given and by whom concerning incidents that occurred on center. Has law enforcement been involved in cases where it appears appropriate that they be notified?
Q3. Students and staff display respect for and appropriately safeguard the property of individuals, the center, and the community.

Strategy:

- Talk to students and staff concerning thefts. Is it a problem? Are reported thefts resolved? Are students provided a safe place for storing their valuables (e.g., locked areas in the dorms, lockers with working locks)?

- Review tort files, property, and inventory records. Ensure that human resources policies and the behavior management system address damage to property.

- Observe students and staff. Do they demonstrate appropriate respect for personal and center property?

- Review the Student Handbook. How is theft addressed? Is there an SOP that provides a procedure for addressing theft?

- Observe dorms. Is there damage in student rooms? Lounge areas?

- Ask a student what happens if they are responsible for destruction of government property?

- Review the center’s maintenance log to determine if requests for repair or removal are due to vandalism or unexplained damages.
Q4. Students feel safe and secure on center.

Strategy:

- Review minutes from monthly Safety Committee meetings. Check for corrective action plans, repeat concerns, and follow-up. How do safety issues model workplace expectations? Do staff and students identify safety concerns and relate them to future workplace opportunities?

- Interview students about staff responsiveness to individual student problems and general student issues. Do students feel their concerns are taken seriously and resolved satisfactorily? Do they have any safety concerns?


- Review the Student Handbook. Does it address EEO issues? Is it clear regarding where to go, whom to go to, and what the process is for EEO complaints? Have there been any complaints in the past two years? Review records and determine if they were addressed appropriately.

- Interview students. Do they have access to the Center Director if they have safety issues? Do they feel safe on center? If they have had safety issues, have they reported them? Do student leaders act as a resource for safety concerns? Are students learning safety in driver education, career technical training, recreation, and during other activities?

- Review the SIR Log to determine if any safety concerns are identified.
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Rationale for Rating:
5.5 MANAGEMENT AND REPORTING OF SIGNIFICANT INCIDENTS

PURPOSE
P1. To ensure proper and effective management of serious incidents involving program participants, staff, or facilities.

REQUIREMENTS

R1. Reportable Events
Centers and OA/CTS contractors shall report the following types of significant incidents to the National and Regional offices:

a. Death, serious illness, or serious injury** (e.g., epidemic, hospitalization, emergency room treatment requiring hospital admission or surgery, reaction to medication/immunization) to an active student and on-duty staff member
b. Physical assault
c. Inappropriate sexual behavior
d. Indication that a student is a danger to himself/herself or others
e. Incident requiring law-enforcement involvement
f. Incident involving illegal activity
g. Arrest of current student or on-duty staff member
h. Motor vehicle accident involving injuries, or damage to a center vehicle
i. Theft or damage to center, staff, or student property
j. Incident threatening to close down the center or disrupt the center’s operation
k. Incident involving a missing minor student
l. Incident attracting potentially negative media attention

**Please see Section 5.18, R2.b for a detailed classification of serious medical injuries.

Strategy:

➢ Review log; check number and types of SIRs that occurred on center.

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Rationale for Rating:

R2. Incidents Requiring Immediate Contact With the Appropriate Regional Office

Centers must immediately report the types of incidents below to the appropriate Regional Office, by both telephone and e-mail. Regional Offices will notify centers and corporate offices of the appropriate points of contact for reporting these incidents.

a. Death of an active student (Centers must also immediately contact the Office of Workers’ Compensation Programs.)
b. Death of a staff member on-duty
c. Any incident:
   1. Requiring law enforcement involvement
   2. Involving a missing minor student
   3. With the potential to garner negative media attention
   4. Where substantial property damage has occurred
   4. Involving inquiries from or visits by elected officials or their offices

The incidents above, with the exception of c4, regarding inquiries and visits by elected officials, also require a report be submitted through the Significant Incident Reporting (SIR) system, as outlined in R3, below.

Strategy:

➢ Review log to see if significant incidents were reported within specified time frames.
➢ Is correct format used?

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Rationale for Rating:

November 10, 2011
R3. Incidents Requiring Electronic Submission of Significant Incident Report

All incidents outlined in R1, above, must be reported through the web-based Significant Incident Reporting (SIR) system. Centers should contact the appropriate Regional Office if there is confusion as to whether a SIR should be submitted.

Centers must:

a. Submit an initial SIR, even if a resolution has not yet been determined for the students/staff involved, according to the timelines below.
   1. Within 6 hours of the center being made aware of an active student or on-duty staff death
   2. Within 24 hours of the center being made aware of all other incidents

b. Continue to submit supplemental reports monthly, or more frequently, if new information is obtained, until a final report has been submitted. Until a report is submitted as final, a supplemental report is minimally required every 30 days following the submission of the initial report.

   a. In the event that a student suffers an injury while on duty or on an authorized day pass, record the incident in SHIMS within 7 calendar days (including weekends) of supervisor notification. SHIMS information, including internal control number (ICN), must be added to victim and/or perpetrator information with the initial SIR, or as soon as it is available.

   b. In the event that a staff member suffers a work-related injury or occupational illness/disease, record the incident in SHIMS (OSHA 301, and OSHA 300 if applicable, only) within 7 calendar days of supervisor notification. SHIMS information, including ICN, must be included in the narrative portion of the report with the initial SIR, or as soon as it is available.

➢ Strategy: Review log to see if significant incidents were reported within specified time frames.

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Rationale for Rating:
R4. Usernames and Passwords

a. Each staff member who is responsible for submitting SIRs through the web-based system is required to have a unique username and password. Upon initial entry into the system, users will be required to change their password to an eight-digit alphanumeric password of their choosing.

Two types of users are assigned:

1. Advanced Users: These are users who may enter, approve, and submit a SIR. Each center must have at least two Advanced Users. An Advanced User can enter and submit a SIR to Job Corps National/Regional offices without approval from the Center Director or another staff member.

2. Basic Users: These are users who may enter information but may not approve/submit a SIR to Job Corps National/Regional offices.

b. Regional and corporate staff may be added to the SIR e-mail distribution list by contacting the health support contractor directly.

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Rationale for Rating:

R5. Display of Student Identifying Information

a. The SIR system does not accept Social Security Numbers as student identifiers. Instead, when entering student data into the SIR system, centers must use the six-digit student ID numbers assigned by Job Corps upon entry to the program. Although centers will enter student ID numbers, as well as related student information in the SIR data-entry fields, the following student identifying information will not be displayed in submitted reports that are e-mailed back to the Advanced User, as well as others who are on the authorized SIR e-mail distribution list:

1. Student first name
2. Date of birth

b. To ensure student privacy, centers must not use student first and last names in the “Description of Incident” field in the SIR. Instead, centers should use the terms “Victim 1,” “Victim 2,” “Perpetrator 1,” “Perpetrator 2,” etc., when describing the incident.
R6. **Management**

Center and OA/CTS contractor management shall:

a. Investigate each significant incident;

b. Initiate appropriate action to resolve the incident; and

c. Identify and implement appropriate procedures to prevent recurrence, to the maximum extent possible.

Strategy:

➢ Is there a procedure for who is in charge? How are issues communicated among appropriate staff?

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**QUALITY INDICATOR(S)**

Q1. Center management resolves incidents in a manner that reduces negative impact on students, the community, and the program.

Strategy:

November 10, 2011
Review SIRs for completeness, and to ensure that appropriate corrective actions have been taken to reduce any negative effect. Did the center respond and report incidents within appropriate time frames? Does the center have a plan to respond to major crisis situations? Are all senior staff well trained to respond to SIR situations?

Q2. Corrective action is taken to reduce or prevent recurrence.

Strategy:

- Review SIRs for appropriate corrective action. If possible, talk to staff and students involved in the incident to determine if the corrective action was appropriate and reduced the negative effect of the incident. How are SIR situations tied into student feelings of being safe at the center and other standards of conduct? Review any negative media articles concerning incidents. Follow up on corrective actions indicated in several of the reports to ensure that action was taken and reduced any negative effect.

- Interview local community leaders and center neighbors. Review SIRs for complaints from community. Is there evidence that complaints were resolved and corrective action implemented?

- Review the SIR system including the list of required submissions, student disciplinary separations, and medical separation files. Are they appropriate?

- Determine if all negative incidents were reported as required by PRH Section 5.5.

- Review any negative newspaper articles about the center. How does the center address these concerns?
Rationale for Rating:

PRH 5.5 - Summary Rating

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5.6 PROCUREMENT AND PROPERTY MANAGEMENT

PURPOSE

P1. To procure property, services, and supplies in a cost-efficient manner in accordance with government policies.

P2. To provide procedures for receipt and accountability of government-owned property, materials, and supplies.

REQUIREMENTS

R1. Procurement (SEE PROCUREMENT REVIEW GUIDE IN APPENDIX C)

Center operators and OA/CTS contractors shall follow all applicable procurement regulations, to include those contained in the Federal Acquisition Regulation (FAR), Department of Labor Acquisition Standards, OMB Circulars, and Executive Orders.

Strategy:

- Request procurement SOP. Review sample of purchase orders to ensure compliance with bidding requirements.

- Review the center’s system to obtain supplies, materials, equipment, and services. Do procedures ensure timely and cost-effective processing? Is it in compliance with the FAR? Do all departments feel they have the items needed to support the necessary training requirements of CDSS? For example, do health occupation students have needed uniforms to participate in clinical assignments? Do facilities maintenance students have proper tools to perform repair tasks?

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Rationale for Rating:

R2. Internal Controls

Center operators and OA/CTS contractors shall:

a. Develop written procedures to procure materials and services on a timely basis and submit these procedures to the Contracting Officer as part of the standard operating procedures. Agency centers shall use established agency procedures for

November 10, 2011
procurement of materials and services. (See Exhibit 5-1, Standard Operating Procedures.)

b. Fully communicate procurement rules and procedures to all staff members involved in the purchase, receipt, custody, oversight, documentation, or inventory of materials and services.

c. Establish systems for the periodic self-evaluation of procurement activities to ensure integrity, accountability, and prevention of fraud, waste, and abuse.

Strategy:

- Ensure the center maintains separation of duties with regard to ordering, receiving, and payment.

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Rationale for Rating:

R3. Reporting

Center operators and OA/CTS contractors shall submit subcontracting reports in accordance with the reporting requirements and schedule described in Exhibit 5-2 (Plan and Report Submission Requirements).

Strategy:

- Request a copy of all subcontracts. Pull invoices to check to see if billing concurs with contracted services.

- Is center meeting goals for small disadvantaged business concerns? Check SF 294 Report. Ensure backup is available to support SF 294 entries.
R4. Receipt and Control of Property

a. Ensure that all supplies and equipment are received and signed into custody by persons other than those who authorize purchases.

b. Receive Material Safety Data Sheets for all potentially hazardous material and distribute them to appropriate departments.

c. Develop and maintain an inventory system to account for all expendable property in accordance with procedures in ETA 359, ETA Property Management Handbook.

d. Maintain an inventory system to account for all non-expendable property through the use of the Electronic Property Management System (EPMS).

e. Conduct a thorough inventory of non-expendable property annually and report the results to the Contracting Officer.

f. Conduct a thorough inventory of all expendable property quarterly.

Strategy:

- Check the Property Requirement List (PRL) vs. property inventory. Are inventories conducted? Check results of these inventories. Ask for off-center repair log. Who authorizes repairs?

- Review the last non-expendable property inventory. Is it submitted to the Regional Office on an annual basis? Is it approved?

- Determine who signs supplies and equipment into custody. Ensure that the person who authorizes the purchases does not sign them in. Review records to confirm.
### R5. Motor Vehicles

Center operators and OA/CTS contractors shall follow the requirements of ETA Handbook 359 and 48 CFR Chapter 1 Subpart 51.2 regarding acquisition and use of motor vehicles.

**Strategy:**

- Request list of vehicles. Review accident reports and maintenance log. What is cost of vehicles vs. usage? Create log to determine usage and cost of vehicles.

### QUALITY INDICATOR(S)

**Q1.** Supplies, materials, equipment, and services required to support program operation are obtained in a timely and cost-effective manner that is in compliance with FAR requirements.

**Strategy:**

- Determine if products and services are procured to meet student needs. How are procurement decisions made to keep the career development needs of the students in mind?
Walk through the center warehouse area. Is it well organized? Are receipts and invoices filed and signed off appropriately?

Review Material Safety Data Sheets. Are they distributed to appropriate departments? Are they posted where all staff can see them?

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Rationale for Rating:

Q2. Expendable and non-expendable property is accounted for accurately.

Strategy:

Determine if responsible staff across center can explain the system they use to account for expendable and non-expendable property. Interview NTC instructors. Are NTC-purchased items inventoried separately from center-purchased items? Are they tagged appropriately?

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Rationale for Rating:
PRH 5.6 - Summary Rating

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5.7 FINANCIAL MANAGEMENT

PURPOSE

P1. To establish and maintain a financial management system that provides accurate, complete, and current disclosures by each contractor and agency receiving Job Corps funds.

P2. To maintain sufficient cost data for effective planning, monitoring, and evaluation of program activities.

P3. To ensure that expenditures of funds are necessary, reasonable, and auditable.

REQUIREMENTS

R1. Budgeting

Center operators and OA/CTS contractors shall assure that budgets are developed, prepared, revised, and submitted in accordance with the requirements contained in Appendices 502 (Financial Reporting) and 503 (Job Corps Outreach/Admissions and Career Transition Services Cost Reporting and Budgeting Requirements).

Strategy:

➢ Check most recent budget to ensure it ties to the estimated cost of the most recent contract modification. Does management staff develop their own budget?

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Rationale for Rating:

R2. Financial Reporting (SEE AUDIT GUIDE)

Center operators and OA/CTS contractors shall assure that required monthly reports are prepared and submitted in accordance with the requirements contained in Appendices 502 and 503.

Strategy:

➢ Review time frames for submission of ETA 2110/2110S. Reports are due by 20th of the month.

November 10, 2011
Pre-onsite: Review the exceptions page of the ETA 2110. Review the explanations and corrective actions. Has the operator conducted internal audits to ensure adequate financial controls and integrity? Was a follow-up plan developed to ensure that any fiscal problems identified continue to be addressed/corrected?

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Rationale for Rating:

**R3. Vouchering (SEE AUDIT GUIDE)**

Center operators and OA/CTS contractors shall submit vouchers for the reimbursement of expenses in accordance with the procedures outlined in Appendices 502 and 503.

Strategy:

- Check to see if vouchers are prepared and submitted on the 1st and 16th of the month. Ensure back-up documentation is attached. OA/CTS operators voucher at month end.

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Rationale for Rating:

**R4. Internal Controls**

Center operators and OA/CTS contractors shall:

a. Establish internal controls to provide reasonable assurance that:

November 10, 2011
1. Management is made aware at an early stage of any situation in which available funding for contracted services is not adequate to secure the delivery of such services.

2. The integrity of the funds provided by the government has not been comprised.

3. Assets are properly safeguarded.

b. Submit written descriptions of control procedures to the Contracting Officer as part of the standard operating procedures in accordance with the schedule shown in Exhibit 5-1 (Standard Operating Procedures). Control procedures shall include:

1. Separation of duties
2. Approval requirements
3. Documentation requirements

c. Establish procedures to regularly communicate budgetary goals and rates of expenditure to management staff who have responsibility for authorizing expenditures.

Strategy:

➢ Ask to review policies and procedures. Review departmental budgets and budget reports. Check petty cash procedures and review petty cash records to ensure government is not paying sales tax or losses on student payroll (if these are reimbursable through petty cash).

➢ Review minutes of financial or budget meetings for senior staff to identify management and planning practices.

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Rationale for Rating:

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R5. **Student Benefit Fund**

Conduct an annual audit of the Student Benefit Fund at each center to assure that the requirements listed in Chapter 3, Section 3.19, R3 (Student Benefit Fund) are met.

November 10, 2011
Strategy:

- Review the Student Benefit Fund to ensure monthly reports are prepared and annual audits are conducted and documented. Determine where income is coming from. Pull last three financial reports. Look at by-laws; do they have approved Student Benefit Fund Plan? Check fine revenue for trends. Do disbursement records include check requests, receipts, SGA minutes, and accountability lists? Are monthly bank reconciliations occurring?

- Ask to review the latest Student Benefit Fund. Is there evidence of an annual audit? Ensure that any corrective actions from the last audit are responded to.

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Rationale for Rating:

**R6. Sale of Center-Produced Goods and Services**

The sale of goods produced or services rendered by students or at Job Corps centers is prohibited except as follows:

a. Objects or services may be sold at cost to students or center employees. For Civilian Conservation Centers (CCCs), sales to staff must be in accordance with approved agency policy.

b. Objects or services may be sold in the community when both of the following criteria are met:
   1. The sale of such products or services does not represent unfair competition with private sources in the area; and
   2. The center has received approval of the Regional Office.

c. Vehicle repair services may be offered only when the following additional conditions are met:
   1. Such services are made available to staff and the general public on an equal basis.
   2. Vehicles serviced are selected on a first come, first served basis.
   3. Prior to acceptance for service of any vehicle, the owner signs an agreement relieving Job Corps of any responsibility for damage, and agreeing to pay for all parts and materials.

November 10, 2011
4. Repair services shall not be provided to rebuild vehicles purchased for speculation or resale.
5. Repair of vehicles owned by non-center Department of Labor and non-center federal employees of operating agencies is prohibited.

   d. The proceeds from the sale of goods shall be credited to the cost category for the purchase of the materials.
   e. Students shall not sell arts and crafts objects made with center-provided materials for personal profit.
   f. The sale of objects made with materials purchased by the Student Benefit Fund is permitted only if proceeds accrue to the Student Benefit Fund.

Strategy:

- Review SOP. Review practice and determine how the sales are recorded.
- Interview the Finance Director. Does the center sell any goods or services produced by students? If so, does the center have an SOP regarding the sale of center-produced goods? Review any records of sales for compliance with PRH Section 5.7, R7.

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Rationale for Rating:

**R7. Taxation of Job Corps Contractors by States or Localities**

If state or local taxes are levied on a center or OA/CTS contractor, the contractor shall follow the procedures set forth in Appendix 504 (Taxation of Job Corps Contractors by States or Subdivisions Thereof).

Strategy:

- Inquire about the center’s process for not paying tax (tax exempt status).
QUALITY INDICATOR(S)

Q1.  Budgeting of expense is accomplished with reasonable accuracy.

Strategy:

➢ Review student welfare fund documentation to ensure the expenditure of funds is reasonable, appropriate, and follows SGA meeting minutes and approvals. Are all funds accounted for? Do students receive practical experience in workplace skills related to budget planning and fiscal accountability?

➢ Review the SOP that relates to budget and finance. Review center procedures to ensure they are followed.

➢ Interview management staff. Are they involved in developing the budget? How much flexibility and input are they given when allocating their department budget? Does the Center Director communicate budget goals, issues, and expectations to management staff? All staff?

Rationale for Rating:
Q2. The program operates within its established budget.

Strategies:

- **Pre-onsite:** Review the monthly financial submissions. Is the contractor working within the approved budget? Do the documents reviewed reflect compliance with PRH financial guidelines? Are the variance explanations and corrective action plans clear? Do they provide information about what caused the variance and what the center plans do to either eliminate the variance or cover the variance in some other way?

- **Interview the management staff.** Did managers and staff provide input when the internal budget was being developed? Do managers and supervisors have copies of their budgets and understand how they are developed and monitored? Have they received copies of budget reports that summarize actual expenses versus budgeted expenses? How often do they meet, if at all, to discuss the budget and are minutes of these meetings on file?

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**Rationale for Rating:**

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5.8 ESTABLISHMENT OF JOB CORPS CENTERS

Not applicable for regional assessments.
5.9 FACILITY STANDARDS

PURPOSE

P1. To ensure that centers provide adequate facilities to meet student needs and to achieve program goals.

REQUIREMENTS

All persons involved in the design, construction, and rehabilitation of Job Corps centers shall adhere to the following standards:

R1. Legally Mandated Standards

   a. Code of Federal Regulations

      1. Safety and Health OSHA ..................................................CFR Part 1926.62
      2. Historical Preservation ..................................................36 CFR Part 800
      3. A/E Design Requirements .................................................48 CFR Part 36
      4. Disability/Accessibility ..................................................28 CFR Part 36

   b. Building Codes Used in the United States

      Centers shall adhere to the most recent applicable Building Code adopted by the state in which the center is located, as follows:

      1. BOCA (National Building Code)
      2. UBC (Uniform Building Code)
      3. SBC (Standard Building Code)
      4. IBC (International Building Code)

Strategy:

➢ Center safety and/or maintenance staff must have a copy of or access to the above standards. Is the staff familiar with the standards? Ask them for examples of how the standards have been applied at the site.

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Rationale for Rating:

November 10, 2011
R2. Job Corps Standards

a. Bathrooms
Bathrooms and showers shall be adequate in number, clean, brightly lit, odor-free, well ventilated, and adequately supplied.

b. Facilities
1. Residential buildings shall provide sleeping rooms, bath and lounge facilities, appropriate administrative spaces, and lockable storage space for student belongings.
2. Counselors shall be provided with private, secured offices with easy student access.
3. Laundry facilities shall be available for student use.
4. Recreational facilities shall include access to a gymnasium, multi-purpose recreation areas, and sports fields.
5. Academic buildings shall have adequate space for classrooms, computer labs, and learning resources.
6. Career training areas shall have classroom and shop space to satisfy the needs of each training program, and resemble the workplace to the extent possible.

c. Dining and Food Preparation
The cafeteria facility shall include a food preparation area, serving area, dining area, and storage areas.

d. Health Services
Medical/dental facilities shall include private medical examining rooms, a nurse’s station, separate infirmary space for males and females, dental facilities, secure drug storage area, and consultation office.

e. Administrative Areas
Administrative areas shall include general office and meeting space.

f. Storage Areas
Center facilities shall include adequate, lockable storage to safeguard confidential records, supplies, equipment, and hazardous materials, and to secure excess property.

g. Child Development Centers
Child development centers and residential parent/child programs shall adhere to standards shown in Exhibit 6-9 (Facility Requirements for Child Development Centers and Residential Parent/Child Programs).

h. Furnishings
Furnishings shall be in satisfactory condition, adequate in number, and appropriate for their use.

Strategy:

- Conduct a walk-through of facilities. Are they adequate? Clean? Are they well-maintained? Is there a maintenance schedule? If not, are there plans for renovations?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Job Corps facilities meet all legally mandated standards and state and local building codes.

Strategy:

- Review the last facility survey. For life-safety deficiencies that are funded, observe the work accomplished and review the statement of work in the survey to ensure work done was appropriate.

- Review the operations and maintenance items listed in the last facility survey. Observe that work has either been completed or that there are plans to address the deficiencies using Career Technical Skills Training (CTST), future operations budget, or center-based maintenance workers.

- Observe available storage for confidential records, hazardous materials, etc. Ensure locked facilities are available and used to store items described in PRH Section 5.9, R2.
Q2. Job Corps facilities are adequate to support the delivery of the Job Corps services.

Strategy:

- Observe classrooms, shops, dining room, and dorm rooms to see if they appear overcrowded. Consult required staff/student ratios and review latest facility survey for table of allocated space for classrooms, shops, and living and recreation areas. Is there adequate space in the health services waiting areas? Are there enough beds in the sick bays?

- Observe and assess the inside and outside of the Outreach and Admissions office. Is the office well marked? Is the office clean and orderly? Is the office easily accessible to applicants and community members? Is it located on a bus line? Is it accessible for students with disabilities? If facilities do not meet accessibility standards, what alternative arrangements are made to ensure that applicants or students with disabilities can access services? Do the office hours meet the needs of all students? How are students who can only come to the office after business hours handled? Are the furnishings and equipment in good condition and suitable for their use? Is the office space sufficient for the services being provided to students?
PRH 5.9 - Summary Rating

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5.10 FACILITY IMPROVEMENTS

PURPOSE

P1. To assess conditions and prioritize facility rehabilitation, construction, and maintenance needs.

P2. To provide funds needed to effect facility improvements.

REQUIREMENTS

R1. Facility Survey

The National Director of Job Corps shall:

a. Arrange for a facility survey of each Job Corps center on a regularly scheduled basis.

b. Use the facility survey as the principal document to establish funding requirements and priorities for construction and rehabilitation at Job Corps facilities.

Strategy:

- Review facility survey and determine if funded deficiencies were completed. Review staff/student ratios; are classrooms crowded?

- Review center quarterly Construction, Rehabilitation, and Acquisition (CRA) reports for the past year to identify CRA project status.

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Rationale for Rating:

R2. Design Review

The National Director of Job Corps shall:

a. Arrange for the Engineering Support Contractor (ESC) to manage the design and construction of identified funded deficiencies.

b. Depending upon the complexity of the project, arrange for review and approval of plans, specifications, and cost estimates by the ESC at the 30%, 60%, and final stages of design.
c. For approved construction or rehabilitation projects in which contracting responsibility has been delegated to a center, review and approve the center’s recommendation for award.

d. Ensure that all capital improvement projects, including CTST projects that involve student labor and cost more than $25,000, are accomplished in accordance with a set of professionally prepared plans and specifications. (See Section 3.13, Career Technical Training.)

Strategy:

- Interview the Facilities Manager and the CTST Coordinator to determine the extent of regional, national, or CTST projects. Ensure approval of CTST projects that involve major construction.

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Rationale for Rating:

**R3. Construction Requests**

a. Where the contracting responsibility for approved construction or rehabilitation has been delegated to a center, the center shall:

1. Submit a recommendation for award of the construction contract to the National Director of Job Corps. The center’s recommendation package shall include:
   
   (a) Results of the bid opening
   
   (b) Bid abstract
   
   (c) Results of investigation of contractor recommended for award

2. Receive the approval of the Regional Director before awarding the contract.

b. Before engaging in facility rehabilitation that meets either of the conditions listed below, including CTST projects, centers shall seek and receive approval from the National Director of Job Corps. Requests shall be submitted through Regional Offices (or agency headquarters for CCCs), which shall forward the requests, with
recommendations for modification or approval, to the National Director of Job Corps. Approval must be obtained if the project involves:

1. Changes to any building structural system.
2. Changes to major mechanical, electrical, plumbing, egress, or fire and safety systems.

c. Projects to (1) construct new facilities, (2) rehabilitate existing facilities, or (3) repair or replace existing facilities shall be constructed in conformance with professionally prepared plans and specifications, in accordance with 48 CFR Part 36.

Strategy:

➢ Review quarterly CRA and check to see if projects were completed in a timely fashion. If incomplete, what is the schedule for completion?

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Rationale for Rating:

R4. Emergency Repairs or Replacement

a. Centers shall submit requests for emergency facility funding to Regional Offices (or to agency headquarters for CCCs), which shall forward the requests, with recommendations for their modification or approval, to the National Director of Job Corps.

b. All requests for emergency funding shall include the following information:
   1. Description of the project.
   2. Estimated costs, including any equipment requirements, and the basis for the estimate. For projects exceeding $25,000, every effort shall be made to obtain three estimates.
   3. Method for accomplishing construction (i.e., subcontract or center staff).

c. Where the failure to immediately effect a repair would seriously disrupt the program, place other facilities at risk, or jeopardize the health and well-being of students, and where it is not possible to contact the National Office staff with
approval authority, Regional Directors may authorize the expenditure of funds to accomplish the repair.

Strategy:

➢ Review pending emergency funding requests; how many were submitted? Was work conducted in a timely fashion?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Facilities are upgraded, improved, and repaired in a systematic fashion according to long-range plans.

Strategy:

➢ Review recent and planned CRA renovations in the center’s five-year plan. Discuss them with center management. Are CRA plans designed to resemble typical workplace situations? Is the Industry Council involved in reviewing CRA plans to ensure that they comply with industry standards? Are accessibility standards for workplaces considered so that all students may fully participate?

➢ Review the center’s five-year facility plan. Does it include appropriate facility upgrades? Are priorities identified and designed to coordinate with CTST and modernization requests? Is the plan reflected in the latest facility survey?

➢ Review the center’s CTST Plan. Does it include facility improvements or rehabilitation projects? Has it been approved by the region? Were any of the projects revised? If so, were approvals received?

November 10, 2011
Q2. Facility improvements are accomplished in an orderly, timely, and cost-effective manner.

Strategies:

- Look at the quarterly construction/rehabilitation report and determine what has been accomplished in completing projects.

- Review the most current CTST Plan. Does it include major changes in building structures? If so, has the center had the plans reviewed by the Job Corps engineering contractor for compliance with state and local construction codes?

- Review emergency funding requests that were approved by the Regional Office. Has the center accurately documented the status of the emergency request? Have projects been completed in a timely manner?
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November 10, 2011
5.11 FACILITY MAINTENANCE AND PROTECTION

PURPOSE

P1. To maintain center facilities in a safe, attractive condition.

REQUIREMENTS

R1. Center Maintenance Program

Center operators shall maintain the buildings, grounds, roads, sidewalks, and equipment for which the center is responsible by implementing a center maintenance program that includes:

a. Written preventive maintenance procedures, submitted to the Regional Office for approval within 90 days of contract award, in accordance with Exhibit 5-1 (Standard Operating Procedures). Qualified maintenance personnel available or on call 24 hours per day, seven days per week.

b. A tracking system that documents scheduled maintenance, work orders, and the amount of time taken to complete work.

c. Procedures for obtaining assistance to handle specialized emergency problems beyond the scope of maintenance personnel.

d. Procedures for completion of rehabilitation projects by maintenance staff, provided that such projects are not subject to the prevailing wage provisions of the Davis-Bacon Act, or, if subject to the Act, that the requirements of the Act are met. Centers shall document the reasons for classifying projects as not subject to the Act, or, if subject, the actions taken to assure compliance.

e. Procedures for handling emergency maintenance problems.

f. Provisions for qualified staff to supervise students performing maintenance work as part of an approved vocational training program or center support program.

Strategy:

- Review preventive maintenance plan and work order system; check log; check maintenance staff schedule (are they on call 24/7?).

- Review any maintenance agreements or subcontracts with local vendors to determine how facility maintenance is accomplished. Are these agreements necessary or warranted? Cost effective?

- Is regular contact/support sought from the National Support Contractor for Facilities?
R2. **Limitation on Use of Maintenance Funds**

Centers shall not use maintenance funds for capital improvement projects.

Strategy:

- Review SOP. Are there any discrepancies?
- Review financial report for potential over-runs in facility maintenance. Determine if operations funds were used for capital improvements.

R3. **Inactive Center Facilities**

The National Director of Job Corps shall be responsible for protecting and maintaining a center when it is closed, in accordance with General Services Administration (GSA) requirements.

Strategy:

- Does the center have inactive facilities? How is the center protecting the facilities?
Quality Indicator(s)

Q1. Center buildings, grounds, roads, sidewalks, and equipment are clean, well maintained, and free of hazards.

Strategy:

- Determine if maintenance includes policing center grounds, roads, and sidewalks.
- Interview staff and students. Do they participate in maintaining the grounds and equipment? Do they display a sense of pride in their workplace facility? Are students involved in a center support program? If so, are they adequately supervised by qualified staff?
- Review center preventive maintenance procedures. Are they followed? Review records of the center system for requesting maintenance and for tracking requests. Does the process have a method for prioritizing requests so that requests that include safety and health issues receive priority over less important ones? Are requests completed in a timely fashion?
- Review the maintenance staffing and scheduling documentation. Is there someone available 24 hours per day, seven days per week?
- Determine what the center process is for emergency maintenance. Ask to see records for the last emergency request for maintenance to ensure adequate staff responded and addressed the issues.
- Review the budget for facilities staffing to determine cost-effectiveness and reasons for overtime or high costs, if applicable.
Q2. Facilities, equipment, and systems are maintained in operating condition.

Strategy:

- Conduct a walk-around survey. Check the conditions of the buildings, vehicles, and other equipment. Are they in good repair and do they appear to be well maintained? Are dorm room doors locked, if applicable? Are lockers locked and in good repair?

- Review maintenance work orders to determine if repairs are requested and completed in a timely manner.

- Review the center’s maintenance plan and the system for work requests and repairs. Determine the level of implementation. Is preventive maintenance emphasized? Are work requests completed in a timely manner? Is priority placed on safety and health issues as well as those that have an effect on facilities?

Q3. Center facilities provide a safe and attractive living and learning environment for students and staff.
Strategy:

- Observe the offices and training areas across center to see if they are clean and well maintained. Pay particular attention to individual staff desks and areas. Are they neat and organized? Are display materials and posters in good condition, current, and reflective of the Job Corps population?

- Observe the condition of physical facilities. Are classrooms decorated to promote learning? Are teaching materials organized and easy to access? Is cleanliness a priority? What evidence indicates safety is a priority in classroom, career technical training, and residential areas? Is there any evidence of vandalism?

- Interview managers across center. How do they enforce standards for cleanliness and appearance? How are safety hazards prevented and addressed?

- Observe landscaping, lawn care, roads, and sidewalks. Are they attractively maintained?

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November 10, 2011
5.12 ENERGY AND WATER CONSERVATION

PURPOSE

P1. To promote energy and water conservation at Job Corps centers.
P2. To reduce overall center operations costs by reducing energy and water use.

REQUIREMENTS

R1. Energy and Water Conservation

Centers shall develop and implement written energy and water conservation procedures that include:

a. Procedures to reduce building energy and water consumption.
b. Procedures to reduce energy consumption by motor vehicles.
c. Assignment of responsibility for energy and water conservation goals to key individuals.

Strategy:

➢ Check plan; what efforts are in place? Who is responsible for this area?

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Rationale for Rating:

R2. Reporting

Centers shall submit quarterly energy and water consumption reports to the National Office through the Regional Office in accordance with Exhibit 5-2 (Plan and Report Submission Requirements).

Strategy:

➢ Check to see if reports are submitted in a timely fashion.
QUALITY INDICATOR(S)

Q1. Centers demonstrate energy and water conservation awareness.

Strategy:

- Review the center energy conservation plan and quarterly energy reports. Interview students and staff regarding their understanding of energy conservation. When walking on center, observe whether energy conservation practices are being employed, such as closing doors and windows in air conditioned spaces, turning off water in bathrooms, etc.

- Review the center procedures to implement energy and water conservation. Is the center following them? Are there any staff or student incentives for conservation efforts?

Q2. Energy and water usage is reduced or contained.

Strategies:

- Review a sample of quarterly energy reports. Is there a trend toward reduction of energy usage?
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Rationale for Rating:

PRH 5.12 - Summary Rating

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November 10, 2011
5.13 FLEET MANAGEMENT

PURPOSE

P1. To ensure accurate documentation and reporting of all contractor-operated Job Corps fleet information.

P2. To inform the Job Corps community of the requirements for all contractor-operated Job Corps centers acquiring new or replacement vehicles and for returning General Services Administration (GSA) lease vehicles.

REQUIREMENTS

R1. Goal Achievement

The National Office of Job Corps shall work continuously to reduce petroleum fuel consumption through the following measures:

a. Increasing the number of alternative fuel vehicles (AFVs) in Job Corps’ fleet.

   Job Corps centers shall make every effort to attain AFVs when replacing existing fleet or when acquiring new leases.

b. Maintaining oversight of all new vehicle acquisitions, replacements, and returns.

   1. Job Corps centers with a need to acquire or replace a vehicle must justify this need or action to the National Office of Job Corps.

   2. To acquire a new or replacement vehicle, the requesting center must submit the “Request to Lease a GSA Vehicle” form to the center’s Project Manager (PM) for submission to the National Office of Job Corps (see Appendix 507). Information on AFVs that can be leased directly from GSA can be found at www.GSA.gov in the most current Product Guide for Alternative Fuel Vehicles (AFV). Appendix 506 contains descriptions of alternative fuels and additional AFV resources.

   Note: When acquiring new vehicles or renewing existing leases, the agency code “1680” should be used to complete all necessary paperwork.

c. Reducing the consumption of petroleum fuel through efficient fleet policies.

   Center operators shall examine their center’s fleet to determine which vehicles are necessary for center operations. Vehicles that are being consistently underutilized (driven less than 800 miles per month) for three consecutive months should be viewed as candidates for return. In order to retain these vehicles, justification must be provided to the National Office of Job Corps, Division of Program Accountability and OA/CTS. Note: There are no eligibility requirements for returning a vehicle to GSA.

d. Establishing fleet standards that will lead to more efficient operations.
Center staff shall acquire vehicles based upon the fleet standards established by the National Office of Job Corps, replacing high-fuel-consumption vehicles with fuel-efficient vehicles.

Center operators shall examine which of their vehicles are high-fuel-consumption vehicles and replace them with more fuel-efficient vehicles. Although vehicle returns may be made at any time, replacements must meet the eligibility requirements set forth by GSA. Vehicle replacements must follow the process outlined in R1.a and R1.b above.

Vehicle replacement standards are the criteria used to determine whether a GSA-leased vehicle is eligible for replacement. This information is listed in Exhibit 5-5, Minimum Requirements for Replacing Vehicles Leased From the GSA Prior to the End of the Lease.

e. Providing GSA with annual fleet acquisition requirements.

Upon the announcement of GSA’s annual solicitation for fleet acquisition requirements for the upcoming fiscal year, each Job Corps center shall prepare its fleet acquisition requirements and send to its Project Manager by August 15 for approval. Acquisition requirements will be forwarded to GSA by the Project Manager. Appendix 508, GSA Annual Fleet Requirements Spreadsheet, should be used by centers to submit this information.

Strategies:

- Pre-onsite: Review online Job Corps fleet database to determine if all vehicles are necessary for center operation.

- Ask for center’s justification if a vehicle is driven less than 800 miles for three consecutive months.

- Review records of newly leased vehicles to ensure the proper procedures are followed.

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Rationale for Rating:
R2. **Standard Operating Forms and Procedures**

Center operators shall ensure that centers have standard forms and procedures in place to document the vehicle information that must be reported to the National Office of Job Corps on a monthly basis. The National Office of Job Corps has developed standard forms to assist in the tracking of fleet information. The standard forms include Exhibit 5-6, Vehicle Log, and Exhibit 5-7, Vehicle Maintenance Log.

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Rationale for Rating:


R3. **Reporting**

Center operators shall ensure that:

a. Fleet Managers are entering all vehicle information into the Job Corps Fleet Management System on a monthly basis.

b. Vehicle information is reported by the 10th day of the current month for the previous month. This information must be recorded in the Job Corps Fleet Management Tracking Tool, which can be accessed through the Job Corps Citrix Portal. The information entered into the system will assist the National Office of Job Corps with its reporting requirements.

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Rationale for Rating:


**QUALITY INDICATOR(S)**

Q1. Job Corps centers are steadily decreasing their use of petroleum fuel.
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Rationale for Rating:

Q2. Job Corps centers are using their vehicles effectively and efficiently.

Rationale for Rating:

Q3. Job Corps centers are acquiring only AFVs where possible.

Rationale for Rating:

Q4. Job Corps centers are tracking and reporting all fleet information accurately on a monthly basis.
Rationale for Rating:

PRH 5.13 - Summary Rating

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5.14 INTRODUCTION TO ENVIRONMENTAL SAFETY AND OCCUPATIONAL HEALTH FOR JOB CORPS CENTERS

PURPOSE

P1. To ensure that students and staff work and live in environmentally healthy surroundings.

P2. To provide a training, living, and working environment that ensures the occupational safety and health of students and staff.

REQUIREMENTS

R1. Governing Regulations and Policy

Centers must comply with federal, state, and local regulations and Job Corps policy regarding environmental safety and occupational health.

Strategy:

- Interview the Center Director and the Safety Officer.
- Do they each have a current copy of PRH Sections 5.14 through 5.20?
- Is the Center Director aware of the penalty for failure to comply with federal, state, and local safety and occupational health requirements?
- Is the Center Director directly involved in the implementation and management of the center’s safety and occupational health program?

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Rationale for Rating:

R2. Occupational Safety and Health Plan

a. Center operators must develop, implement, and maintain a center-specific Occupational Safety and Health Plan, which must be signed by the Center Director. Note: Corporate plans or templates are unacceptable. Plans must be tailored to each center.

b. Plans must be evaluated annually by the center and revised when:

1. A new or revised PRH or regulatory standard necessitates revision of specific plan;
2. The center introduces a new trade resulting in new potential hazards; or
3. New hazards exist due to changes in equipment or materials.

c. Plans must contain a revision tracking sheet that lists each component of the plan and documents changes made to the plan (i.e., specific change and date of revision).

d. Plans must remain on center when there is a change in center operator. Center operator policies and procedures regarding safety that are considered “proprietary” should not be part of center safety program plans. This information should be maintained separate from the PRH Occupational Safety and Health program requirements.

e. Each Occupational Safety and Health Plan must consist of the following components at a minimum (where applicable):
   1. Center Safety Orientation
   2. Staff Training
   3. Basic Equipment for Safety Officers

f. All center Safety Officers must possess the following equipment items, at a minimum, to effectively perform their responsibilities. Additional equipment may be required, depending on the center’s hazard analysis.
   1. A quality camera
   2. Safety shoes
   3. Safety helmet/hardhat
   4. Safety goggles/glasses
   5. Gloves
   6. Use of computer with word processing, e-mail, Internet capability, and CD-ROM
   7. Flashlight
   8. Electrical circuit tester and ground fault circuit interrupter tester (GFCI)

g. The following items should be available when appropriate and necessary to identify and control hazards:
   1. Lockout/tagout kits
   2. Air flow meter (Alnor Velometer® Jr.)
   3. Hearing protection
   4. Swimming pool test kits
   5. Low-volume air sampling pumps
   6. High-volume air sampling pumps
   7. Sound level meter with octave band analyzer
8. Noise Dosimeters

h. Regulations and Policies

All center operators, Center Directors, and Safety Officers must follow and refer to the following policy and regulatory information in performing their safety and health program review activities:

3. Department of Labor Manual, Series (DLMS) 4, Chapter 800, DOL Safety and Health Program
4. Job Corps Policy and Requirements Handbook (PRH)
5. NFPA 70, National Electrical Code® (NEC)

i. Occupational Safety and Health Committee

1. Overview

   Each center must establish an Occupational Safety and Health Committee in accordance with 29 CFR 1960.58 to:

   (a) Review reported accidents, injuries, and illnesses.
   (b) Consider the adequacy of action taken to prevent recurrence of such accidents, injuries, or illnesses.
   (c) Plan, promote, and implement DOL and Job Corps Occupational Safety and Health programs.

2. Committee Membership

   The Center Director must actively participate on the Occupational Safety and Health Committee. In addition to the Center Director, committee membership must include:

   (a) Center Safety Officer (facilitator)
   (b) Manager of residential living
   (c) A maintenance unit supervisor
   (d) A health services supervisor
   (e) A CTT supervisor
   (f) A recreation supervisor
   (g) A food service supervisor
   (h) A minimum of two students, selected by their peers
   (i) Representatives from other organizational units, as appropriate

3. Duties of Committee Members
Committee member duties must include, but not be limited to, the following:

(a) Assist in safety inspections when requested by the Safety Officer. Student committee members must participate in safety inspections at least monthly.

(b) Observe and report infractions of safety rules and regulations.

(c) Review accident reports to determine if corrective action is necessary or if harmful trends exist.

(d) Review inspection reports prepared by the center Safety Officer identifying unsafe/unhealthful conditions, and suggest techniques or strategies for correction/abatement.

(e) Review all suggestions and concerns submitted by students and staff, and make recommendations for implementation to the Center Director.

(f) Develop and implement a safety awards and recognition program.

4. Training for Committee Members

In accordance with 29 CFR 1960.58, Safety Committee members must complete training commensurate with the scope of their assigned responsibilities within six months of appointment. Such training must include:

(a) The center’s Occupational Safety and Health program (recommend training within 30 days of appointment)

(b) Section 19 of the OSH Act of 1970

(c) Executive Order 12196

(d) General content contained in 29 CFR 1910, 1926, and 1960

(e) Center procedures for the reporting, evaluation, and abatement of hazards

(f) Center procedures for reporting and investigating allegations of reprisal, and the recognition of hazardous conditions and environments

(g) Identification and use of occupational safety and health standards, and other appropriate rules and regulations

5. Occupational Safety and Health Committee Meetings

Meetings must be held monthly and/or when called by the Center Director or Safety Officer. Copies of minutes must be maintained at the center for three years and made available upon request.

Strategy:

November 10, 2011
 Review the center’s topic-specific written Occupational Safety Plans per PRH Section 5.20. Are they current?
 Has the Center Director reviewed and approved the overall center safety program plan?
 Who is responsible for monitoring the overall safety program plan?
 Is the center safety program promoted to staff and students?
 How is the safety program promoted to staff and students?
 Is staff trained in safety work practices and procedures?
 Does the Safety Officer have access to the regulations and policies listed in PRH Section 5.14, R2.h?
 Is there a Safety Committee?
 Who is on the committee?
 Is there student representation?
 Is the Center Director an active member of the Safety Committee? (Check the meeting minutes.)
 Have the members of the Safety Committee received the required training?
 Are student members replaced in a timely manner?

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Rationale for Rating:

**R3. Occupational Safety and Health Program**

Center operators must establish and operate an Occupational Safety and Health program in accordance with the requirements established in this section. The center’s program must fully comply with current Occupational Safety and Health Administration (OSHA) standards at 29 CFR 1904, 1910, 1926, and 1960, and with U.S. Department of Labor (DOL) regulations, policies, and procedures. It must include, but not be limited by, the following features:

a. Appointment of a center Safety Officer who is properly trained in OSHA courses listed in Exhibit 5-4 (Required Staff Training)
b. Development of an Occupational Safety and Health Plan, which is updated as needed or as directed by OSHA or the National Office (see R2 above). Center plans must include the following if applicable. See referenced section below for plan details:

1. Personal Protective Equipment (PPE) Plan *(See Section 5.20, R1)*
2. Fire Safety and Prevention Plan *(See Section 5.20, R2)*
3. Emergency Action Plan *(See Section 5.20, R3)*
4. Hazard Communication Plan *(See Section 5.16, R6)*
5. Recreational Safety Plan *(See Section 5.20, R5)*
6. Asbestos Operations and Maintenance Plan *(See Section 5.16, R5)*
7. Confined Space Entry Plan *(See Section 5.20, R7)*
8. Bloodborne Pathogens Plan *(See Section 5.20, R8)*
9. Respiratory Protection Plan *(See Section 5.20, R9)*
10. Hearing Conservation Plan *(See Section 5.20, R10)*
11. Lead Exposure Plan *(See Section 5.16, R4)*
12. Hexavalent Chromium Exposure Plan *(See Section 5.16, R9)*
13. Lockout/Tagout Plan *(See Section 5.20, R13)*
14. Powered Industrial Vehicle Plan *(See Section 5.20, R14)*

c. Investigation and reporting of accidents and injuries

d. Enforcement of safety and health rules and regulations

e. Conduct of safety inspections and initiation of corrective actions

f. Development of a safety recognition program

g. Establishment of Occupational Safety and Health Committees

Strategy:

- Who is the center Safety Officer?
- Did he or she complete the required training within 180 days of appointment?
- Does the center Occupational Safety and Health Plan include the applicable elements listed in PRH Section 5.14, R3.b?
- Are student and staff occupational injuries and illness investigated?
- Are causal factors identified?
- Who is responsible for ensuring that corrective action is taken to prevent future occurrences?
- How are safety and health rules and regulations enforced?
- Who conducts safety inspections?
How are unsafe and unhealthy living, working, and training conditions reported?
Is the Safety Committee active?
When was the last regular meeting?
Is there a safety awards program?

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Rationale for Rating:

**R4. Center Occupational Safety and Health Responsibilities and Duties**

a. General Responsibilities

The center operator must be responsible for safeguarding the occupational safety and health of all students and staff and ensuring a safe and healthful environment in which to live, work, and train. This responsibility will be inherent in all aspects of the program, whether stated explicitly or implied.

b. Center Operating Contractors and Federal Agencies

Center operating contractors and agencies will:

1. Ensure a training, living, and working environment that is free from recognized hazards.
2. Ensure that the Center Director is an active participant on the Occupational Safety and Health Committee.
3. Appoint a center Safety Officer and provide necessary training and equipment for the performance of those duties. The center Safety Officer will report directly to the Center Director on matters of safety.
4. Ensure that the Center Director or designee (e.g., Safety Officer) has the authority to terminate any activity where a hazard exists.
5. Enforce occupational health and safety rules, regulations, and standards.
6. Ensure that personal protective equipment (PPE) is worn in the trade programs to comply with OSHA standards.
7. Report fatalities, injuries, and occupational illnesses to DOL in a timely manner.
8. Instruct students and staff in safe practices and methods of operation.

9. Conduct required occupational health and safety inspections and surveys and take prompt corrective action to deal with hazards identified.

10. Provide medical and dental services and supplies for injured and occupationally ill students.

11. Investigate accidents and complete and submit appropriate reports.

12. Encourage and evaluate student suggestions on safety and health improvements.

13. Develop and implement a safety awards and recognition program.

14. Ensure that safety and health evaluation reports provided by the National Office of Job Corps are responded to within 30 days of receipt and that corrective action is taken to abate hazards noted.

(NOTE: Items c and d, regarding what the Regional Offices and National Office will do, are not included here.)

e. Center Director

The Center Director will:

1. Ensure that all occupational safety and health requirements are implemented.

2. Provide leadership, direction, enforcement, and accountability for the center safety program.

3. Develop a center Occupational Safety and Health program and plan.

4. Ensure that personal protective equipment (PPE) is worn in the trade programs to comply with OSHA standards.

5. Ensure a training, living, and working environment that is free from recognized hazards. Maintain facilities and grounds in a sanitary and healthful manner.

6. Participate in all Occupational Safety and Health Committee meetings.

7. Appoint a center Safety Officer and provide necessary training and equipment for the performance of those duties. The center Safety Officer will report directly to the Center Director on matters of safety.

8. Terminate any activity where a hazard exists; additionally, the authority to terminate any such hazardous activity may be given to a designee (e.g., Safety Officer).


10. Report fatalities, injuries, and occupational illnesses to DOL in a timely manner.

11. Instruct students and staff in safe practices and methods of operation.

November 10, 2011
12. Conduct required occupational health and safety inspections and surveys and take prompt corrective action to deal with hazards identified.

13. Provide medical and dental services and supplies for injured and occupationally ill students.

14. Investigate accidents and complete and submit appropriate reports.

15. Encourage and evaluate student suggestions on safety and health improvements.

16. Establish a formal written safety awards and recognition program, and use it to recognize students and staff who make significant contributions toward the prevention of injury or illness.

17. Review safety awards and recognition programs annually.

18. Ensure that safety and health evaluation reports provided by the National Office of Job Corps are responded to within 30 days of receipt and that corrective action is taken to abate hazards noted.

f. Center Safety Officer

The center Safety Officer will:

1. Assist the Center Director in preparing the center Occupational Safety and Health Plan and implement the plan.

2. Provide orientation and training to students and staff on the center Safety and Health Plan.

3. Promote safety campaigns on center to reduce accidents and injuries.

4. Inspect all center areas for safety and health violations.

5. Ensure that personal protective equipment (PPE) is worn in the trade programs to comply with OSHA standards.

6. Complete all required accident and injury reports in full compliance with the PRH and OSHA regulations.

7. Advise the Center Director of safety and health concerns.

8. Facilitate required Occupational Safety and Health Committee meetings; retain meeting minutes for three years, and make them available upon request.

9. Coordinate with other Safety and Health staff (e.g., nurse, maintenance supervisor, CTT/education instructors, and others) to ensure a safe and healthful environment in which to live, work, and train.


Strategy:

November 10, 2011
Observe safety practices promoted by staff throughout the center, with a particular focus on those areas where students and staff may be exposed to hazardous conditions.

Interview students. Do they know about and can they describe safety practice for their career technical trade?

Interview management and other staff to determine whether they are familiar with the center’s Safety and Health Plan as it pertains to their area of operations.

Do staff support and emphasize safety?

Who is the center Safety Officer?

Does he or she meet the position’s requirements?

Does the Safety Officer provide a safety orientation for staff and students that includes training on the center Safety and Health Plan?

Determine if the center has a Safety Committee.

Ask to see a listing of the members. Does it include the required members as described in PRH Section 5.14, R2.i.2?

Does the Safety Officer facilitate regular Safety and Health meetings?

Is the Center Director an active member/chairperson of the committee?

Review the minutes of those meetings to determine if they focus on ensuring a safe and healthy environment throughout the center.

Interview students. Are they involved in safety on center?

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Rationale for Rating:

R5. **Center Occupational Safety and Health Orientation Training**

In accordance with 29 CFR 1960.58, centers shall provide the appropriate safety and occupational health training to students and staff, including specialized training appropriate to the training or work tasks performed. Center safety and health orientation and training shall include the following:

a. Introduction to Center Life (New Students) - CPP
   (See Chapter 2, Section 2.2.)
b. New Staff Training  
(See Exhibit 5-4.)

c. Ongoing Staff Training

The center must provide required occupational safety and health training included as part of the center’s annual training plan. Each plan must include anticipated occupational safety and health training needs, such as the anticipated number of staff members to be trained, where and when the training is to be performed, and the estimated cost (see Exhibit 5-4).

d. Training Standards and Documentation

Safety training must be conducted in accordance with current OSHA standards 29 CFR 1904, 1910, 1926, and 1960 and DOL guidance provided by the National Office of Job Corps. Center Safety Officers must have and maintain these references and regulations on hand at all times. Further, all completed training must be properly documented and maintained on center in the individual’s personnel or continuing education file for up to three years, and one year beyond employment. Training records must be available upon request.

e. Minimum Training Requirements for Center Safety Officers

1. The center Human Resources Manager will implement a professional development program (signed by the Center Director) for the Safety Officer that shall include, but is not limited to, the courses listed in Exhibit 5-4.

2. The Safety Officer shall complete the Occupational Safety and Health for Other Federal Agencies course with expanded segment on accident/incident investigation training (OSHA 600) within the first 180 days of initial assignment.

3. The Safety Officer shall complete Asbestos Identification and Handling course (competent person) (if applicable) within 90 days of initial assignment.

4. The Safety Officer shall complete Lead Based Paint Identification and Handling course (competent person) (if applicable) within 90 days of initial assignment.

5. The center operator and Center Director must ensure that the Safety Officer receives training in the remaining safety-related courses referenced in Exhibit 5-4 within 18–24 months of appointment.

6. In accordance with PRH Section 5.3, annual advanced or refresher training must be provided to the Safety Officer after basic required courses are completed.

7. In accordance with DLMS 4, Chapter 800, Paragraph 822, the Center Director must ensure that a written Professional Development Plan is developed and implemented for the Safety Officer. Further, all completed courses must be properly documented and maintained on center in the
individual’s personnel or professional development file for the duration of employment, and one year beyond employment. Training records must be available upon request.

Strategy:

➢ Review staff training records to determine that staff has received required training in accordance with PRH Exhibit 5-4.
➢ Has the Safety Officer completed required OSHA 600 training within 180 days of appointment?
➢ Is there a Professional Development Plan in place for the Safety Officer?
➢ Has the Safety Officer completed required safety training within 18–24 months of initial appointment?
➢ What arrangements have been made to ensure that delinquent training requirements have been met?
➢ Who is responsible for student safety training?
➢ What is the process for handling student failure to follow safety requirements?
➢ How are accidents related to failure to follow safety and occupational health requirements handled?
➢ What is the penalty for repeated violation of safety and occupational health policies and procedures?
➢ Review the most recent National Office of Job Corps OSH Program Review reports. Follow up on the implementation of corrective actions taken to address deficiencies.

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Centers comply with federal, state, and local regulations and Job Corps policy regarding environmental safety and occupational health.

November 10, 2011
Q2. Center operators establish and operate an Occupational Safety and Health program.

PRH 5.14 - Summary Rating

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5.15 SAFETY INSPECTIONS, OBSERVATIONS, AND OSH PROGRAM REVIEW

PURPOSE

P1. To ensure that students and staff work and live in environmentally healthy surroundings.

P2. To provide a training, living, and working environment that ensures the occupational safety and health of students and staff.

REQUIREMENTS

R1. **Imminent Danger**

Imminent danger exists when a condition or practice presents a danger that could reasonably be expected to cause death or serious physical harm. If such a situation exists and is observed, the student(s) and staff in danger must be immediately removed from the area and not permitted to return until the problem is corrected. The Safety Officer must immediately notify the Center Director of the hazard and recommend corrective action. The Center Director must take appropriate action(s) to correct the hazard. If the hazard cannot be corrected promptly by the center, the Center Director must consult the appropriate Regional Office and/or the National Office of Job Corps for advice and assistance in correcting the hazard. The action recommended by the Safety Officer and the resulting action taken must be documented in writing and maintained on center for a period of three years.

Strategy:

- Does the Safety Officer know what to do in the event of imminent danger?
- Does the Center Director know what to do in the event of imminent danger, if the hazard cannot be corrected promptly by the center?

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Rationale for Rating:

R2. **Required Inspections and Observations**

a. All occupational safety and health inspections and observations must be:
1. Conducted by appropriate center staff in accordance with 29 CFR 1960.25 and DLMS 4 Chapter 800, paragraph 825.

2. Submitted according to Exhibit 5-2, Plan and Report Submission Requirements.

3. The responsibility of the center Safety Officer, managers, supervisors, and instructors.

4. Documented and maintained on center for a period of five years, then destroyed.

b. Observations on a daily basis, and weekly or monthly inspections are required for all center:

1. Buildings
2. Facilities
3. CTT facilities
4. CTST projects
5. Academic classrooms
6. Cafeterias
7. Dormitories
8. Health services
9. Administrative offices
10. Recreation areas
11. Gymnasiums
12. Swimming pools
13. Child development center facilities, including playgrounds
14. Equipment
15. Vehicles used to transport students

Identified deficiencies must be corrected promptly. Weekly and monthly inspections, and hazards identified during daily observations, must be documented. Records of inspections and actions taken to correct deficiencies must be maintained by the center Safety Officer for three years, and made available upon request.

c. Daily Observations

1. Food service supervisors must check food preparation and food serving areas of cafeterias.

2. Residential Advisors must check dormitories, snack bars, and canteens and document their findings in a log book.
3. The Safety Officer, and CTT and Academic managers/instructors, must check classrooms/shops (including CTST projects), motor vehicles, and all equipment to be used by students and staff.

4. Child Development Supervisors must check the child development center, equipment and toys, and the playground.

5. Recreation Supervisors/staff must check the gymnasium, exercise equipment, and other frequently used recreation areas.

d. Weekly Inspections

The center Safety Officer must inspect:

1. All food service facilities, including cafeterias, culinary arts facilities, snack bars, and canteens.

2. Gymnasiums, exercise equipment, and swimming pools during times of operation.

3. CTT facilities and CTST projects.

e. Monthly Inspections

The center Safety Officer must inspect:

1. Dormitories

2. Child development center

3. CTT facilities and CTST projects (see Chapter 3, Section 3.2)

4. Academic classrooms

5. Health services

6. Administrative offices, warehouses, and other buildings occupied by students and staff

f. Quarterly Inspections

Centers must arrange for quarterly environmental health inspections by qualified non-center personnel in the following areas:

1. Food service facilities

2. Residential facilities

3. Training facilities

4. Educational facilities, including offices, classrooms, recreational facilities, and wellness center

5. Water supply and distribution facilities, when not a part of municipal systems

6. Wastewater treatment facilities, except for septic systems, which must be inspected annually, and municipal sewer systems, which are exempt from this requirement

November 10, 2011
7. Child development center, where appropriate

Centers must submit quarterly environmental health reports and necessary corrective action, simultaneously, to the Regional Office and the National Office of Job Corps within seven days of receipt. (See Exhibit 5-2, Plan and Report Submission Requirements.)

g. CTST and Other Projects

The center Safety Officer and appropriate instructor must inspect all CTST projects daily. The center Safety Officer must inspect and approve all final CTST projects, on and off center, before site occupancy and project completion. Inspection checklists, photographs, and associated corrective actions must be maintained on center indefinitely and made available upon request.

Strategy:

- Review inspection logs. What is the average number of safety and health hazards cited during inspections by the center’s Safety Officer during daily and monthly inspections?
- The number of safety and health deficiencies identified during the quarterly environmental inspections?
- How many deficiencies were identified previously during the daily, monthly, and quarterly inspections?
- Determine if the center submitted necessary corrective action plans in response to the Regional Office and the National Office within seven days of receipt.
- Did they implement corrections immediately to the violations considered serious?
- Interview the Safety Officer to determine his or her awareness of any violation of local and state building codes and standards. If any exist, what action has the center taken to resolve them?

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Rationale for Rating:

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**R3. Annual Occupational Safety and Health (OSH) Program Reviews**

a. The annual Occupational Safety and Health (OSH) Program Review is conducted in accordance with Executive Order 12196, Title 29 Code of Federal Regulations (CFR) part 1960, Department of Labor Manual Series (DLMS) 4, Chapter 800,
and the Job Corps Policy and Requirements Handbook (PRH). The review verifies that each center has implemented the Occupational Safety and Health program outlined in the PRH and identifies any outstanding occupational health and safety deficiencies.

b. The review is conducted using the Job Corps Program Assessment Guide (PAG), Chapter 5, Sections 5.14-5.20. The PAG is a companion to the PRH. It provides a standardized approach and framework for the review and evaluation of contractors/operators’ delivery of services as specified in the PRH. The review consists of an on-site visit including opening and closing conferences, walkthrough of facilities, document verification, and student/staff interviews.

c. The review process is designed to determine the extent to which program operations meet the government’s requirements and expected outcomes. The PRH requirements and quality indicators set benchmarks for the government’s expectations. Job Corps uses an adjectival rating system to assign ratings to each requirement, quality indicator, and overall program component. The adjectival rating system uses five adjectives, as recommended by the Office of Federal Procurement Policy, to define the degree to which expectations are met. Adjectival ratings are defined as follows:

**Exceptional**
Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.

**Very Good**
Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.

**Satisfactory**
Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.

**Marginal**
Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.
Unsatisfactory
Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.

d. For the purpose of the OSH Program Review, the adjectival ratings definitions are designed to assist evaluators in assigning scores for each requirement and quality indicator by describing what is expected for each adjectival level.

The ratings are made against a 10-point scale, as shown below.

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e. At the end of each PAG section, the ratings for each requirement and quality indicator are averaged. The average compliance and quality ratings for all sections 5.14–5.20 are then averaged to produce final ratings. The final compliance and quality ratings constitute the final OSH Program Review score.

f. Documentation Examined During Review
Documentation is critical. Reviewers will assess only the documentation provided to them while they are on center. Should the required documentation not be presented, the center will not be credited with the associated item. The reviewer will give the center Safety Officer (or designee) an opportunity to present any omitted documentation before the end of the review. Documentation that is created during or after the opening day of the review, however, will not be considered. OSH Program Review rebuttals based upon missing or unaccepted documentation at the time of the review will be rejected and the final score will not be changed.

g. Interviews During the Review
The strategies outlined in the PAG necessitate interviews with the Center Director, staff members, and students to determine knowledge and involvement. In cases where verbal statements and documentation conflict, reviewers will use their professional judgment in deciding whether to award credit. Rebuttals or scoring changes based upon discussions with the reviewer that are not substantiated by the rationale for rating or other documentation will be rejected and the final score will not be changed.

h. Documentation of Deficiencies and Abatement Activities
National Office OSH Program Reviewers are required to document deficiencies in the Abatement Tracking System (ATS) website. Job Corps centers are required to document and post deficiencies manually on the DOL Form DL1-2029. Blank forms can be obtained from the Job Corps Community website. Center abatement activities must be documented in ATS. The ATS website can be accessed at: http://ats.dol.gov/.
Strategy:
- Does the Safety Officer have copies of the current PRH Sections 5.14–5.20 and all applicable policy directives?
- Does the Safety Officer update the center Safety Plan as needed?
- Does the Safety Officer understand the OSH Program Review process?
- Does the Safety Officer know how to prepare for the annual review?

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Rationale for Rating:

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**R4. Occupational Safety and Health Facility Survey (Pre-Occupancy)**

a. An occupational safety and health environmental facility survey (pre-occupancy) must be conducted before moving students into:
   1. A new center, dormitory, or classroom; or
   2. A facility that has been renovated so as to change any building structural system or major mechanical, electrical, plumbing, egress, or fire and safety system.

b. Centers must contact the Regional Office (RO) Project Manager to schedule a pre-occupancy survey 30 days prior to project completion.

c. The pre-occupancy survey must be coordinated through the RO and conducted by the center Safety Officer and/or the National Office of Job Corps (NO). The NO will determine who will conduct the pre-occupancy inspection.

d. Major deficiencies must be corrected before occupancy.

e. The survey report will be distributed prior to occupancy, and it will be maintained by the NO, RO, and the center.

Strategy:
- Does the center understand the requirements for planning and funding construction, renovation, and demolition projects on center?
- Has the center received Regional Office approval for construction projects?
- Has the center coordinated with the Regional Office to schedule a pre-occupancy inspection?
R5. Monitoring of Work-Based Learning Sites

Centers are responsible for ensuring that students are placed in safe and healthful working conditions at work-based learning locations. However, Job Corps’ responsibility will not extend to reviewing or inspecting private employer businesses for compliance with OSHA standards because this authority rests only with OSHA.

To ensure the occupational safety and health of students at private employer work sites, appropriate career development staff and/or the center Safety Officer must:

a. Visually survey the work site for potential hazards and discuss safety and health requirements with the employer.

b. Ensure the employer signs a written agreement that specifically states that employer will provide students with safety and health protection which shall be at least as effective as that which is required under the Occupational Safety and Health Act of 1970 (29 U.S.C.) and 29 CFR parts 1910, 1926, and 1960.

c. Monitor active work sites on a regular basis. If hazards are noted, the employer shall be requested to take corrective action. Students should be removed from work sites where hazards exist that could cause personal injury or impairment of the health of students.

d. Document the injuries of students who are injured on work-based learning sites in the Safety and Health Information Management System (SHIMS), as they are covered by the Federal Employees’ Compensation Act (FECA).

Strategy:

➢ Has the center visually surveyed WBL sites and discussed safety hazards with the employer prior to students reporting for training?

➢ How often does the Safety Officer visit WBL sites?

➢ Is there a signed agreement between the center and WBL entity ensuring student safety and occupational health protection in accordance with the OSHA act?
 Interview students. Do they know how to report unsafe and/or unhealthy working conditions?
 Are they provided the proper personal protective equipment and task-specific safety training upon reporting for training?
 Do they know how to report injuries?

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Rationale for Rating:

R6. Abatement Plans for Violations Identified in Annual Occupational Safety and Health (OSH) Program Review

a. Abatement Procedures and Time Frames

The following procedures shall be followed by centers and Regional Offices (ROs) in responding to safety and health violations cited during annual safety and health reviews:

1. As part of the OSH Program Review, the center will receive a detailed verbal briefing regarding all hazards identified. The center must immediately begin to address those concerns. A log of the corrected item(s) must be maintained, indicating what action was taken, by whom, and the date of action.

2. The center and the RO will receive a formal OSH Program Review report from the National Office of Job Corps (NO) within 60 days of a review. Violations must be documented manually on Form DL1-2029, Notice of Unsafe or Unhealthful Condition, which is to be created by the center. The violations documented on the DL1-2029 are the same as those documented in the Abatement Tracking System (ATS), which is the Web-based system designed to facilitate an information exchange between the reviewer, the RO, and the center, and to allow the NO to monitor case status to ensure prompt and timely hazard abatement.

3. The roles of each ATS user are as follows:

(a) At the national level, the NO inputs DL1-2029 center violation data into ATS and transmits the data to the RO to initiate tracking.
(b) At the regional level, both the Job Corps Regional Director and the center’s Project Manager are authorized to access ATS to view new cases transmitted from the NO and centers’ abatement responses. Either individual in the RO can transmit the DL1-2029 in ATS to the Job Corps center. The RO can edit the center response and can close out the case only after all violations have been abated.

(c) At the center level, the Center Director and the Safety Officer are authorized to access ATS to view new cases transmitted from the RO and can respond to violations. Most violations should be abated within 30 days. If abatement is not completed, an abatement plan is required. Centers can indicate in ATS whether the response is a corrective action or an abatement plan. Funding requests can also be indicated. After the center transmits the response electronically to the RO, the RO will determine whether to accept the abatement response in part or in whole.

**Note:** ATS is not capable of providing users e-mail notification, so the system should be checked frequently.

b. Posting Requirements

Official response to violations noted during the Occupational Safety and Health Review occurs via ATS. A copy of the paper DL1-2029, which must be created by the center, is to be posted by the center at or near each place where an unsafe or unhealthful condition is referred to in the notice. It must remain posted until all violations cited are abated, or for three training days, whichever is longer.

Strategy:

- Does the center begin to abate identified hazards immediately after the OSH Program Review?
- Does the Safety Officer have an electronic copy of the DL1-2029?
- Does the Safety Officer post a DL1-2029 at or near each place where an unsafe or unhealthful condition was identified during the review?
- Does the Safety Officer have access to the Abatement Tracking System (ATS)?
- Does the Safety Officer update the ATS in a timely manner?
- Did the center post the DL 1-2029, Notice of Unsafe or Unhealthful Condition, for the last OSH Program Review? Request filed DL 1-2029.
- Has the center completed abatement of hazards identified during the last OSH Program Review? Check the Abatement Tracking System (ATS) to verify.
QUALITY INDICATOR(S)

Q1. Centers comply with federal, state, and local regulations and Job Corps policy regarding environmental safety and occupational health.

Q2. Residential and dining facilities are clean and neat in appearance.

Q3. Few safety and health hazards are cited during inspections by the Safety Officer, during annual Occupational Safety and Health (OSH) Program Reviews, and during environmental inspections.
Unsatisfactory | Marginal | Satisfactory | Very Good | Exceptional
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Rationale for Rating:

PRH 5.15 Summary Rating:

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5.16 ENVIRONMENTAL HAZARDS

PURPOSE

P1. To ensure that students and staff work and live in environmentally healthy surroundings.

P2. To provide a training, living, and working environment that ensures the occupational safety and health of students and staff.

REQUIREMENTS

R1. Hazardous Materials Management

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding hazardous waste generation, storage, and disposal.

1. Centers that ship hazardous materials off center must comply with pre-transportation regulations per 49 CFR 262 Subpart C.

2. Centers that store or handle hazardous materials, such as flammable/combustible materials, acids, caustics, compressed gases, oxidizers, etc., must comply with OSHA 1910 Subpart Z and all applicable substance-specific standards.

3. Centers that use hazardous or toxic chemicals must comply with the regulations of the Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986.

4. Centers must notify the Environmental Protection Agency (EPA), the Job Corps Regional Director, and the National Office of Job Corps Safety Team Leader when a release of hazardous substance occurs. A release includes any discharge, spill, or leak into the air, water, or land, as stipulated in 40 CFR 302.

5. Emergency response to a spill or leak of hazardous materials must be performed by the local hazardous materials response team or licensed contractor.

6. Chemical-specific information such as Material Safety Data Sheets (MSDSs) must be readily accessible to emergency response personnel.

Strategy:

- Review hazardous waste shipping manifests, containers, and container labels. Are centers complying with applicable federal regulations?
- Are hazardous materials stored in NFPA-approved storage containers and/or cabinets?
- Has the center experienced a hazardous material spill, leak, or release?
- How was the situation handled?
- Were necessary corrective actions taken to prevent future incidents?
- Has the center provided the local fire department and/or hazardous materials response team with copies of MSDSs for all hazardous materials used on center?

November 10, 2011
Unsatisfactory Marginal Satisfactory Very Good Exceptional

Rationale for Rating:

R2. Polychlorinated Biphenyls (PCBs)

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding polychlorinated biphenyls (PCBs) in electrical transformers.

1. Centers that are using electrical equipment known to contain PCBs must register with the EPA’s Transformer Registration and PCB Activity Database. A copy of the registration certificate can be obtained from EPA and must be maintained on center indefinitely, and must be available for review upon request.

2. Centers must prepare an inventory of all center equipment, including transformers, capacitors, fluorescent lights and ballasts, and hydraulic oils, that may contain PCBs. The inventory shall include the following:
   (a) Type of equipment, installation date, and manufacturer
   (b) Overall condition
   (c) Contact information for nearest PCB waste hauler

Strategy:

- Has the center completed an inventory of all equipment that may contain PCBs?
- Does the equipment show signs of deterioration or damage that may result in a spill or release of PCBs? (Spillage will look like oily, dirty water. Soil and grass will appear discolored or slick.)
- Does the inventory include the type of equipment, installation date, and manufacturer’s contact information?
- Does the inventory include the overall condition of the equipment?
- Does the center have the name and contact information for the nearest PCB waste hauler?
- Does the center have an EPA Transformer and PCB Activity registration certificate?
R3. Underground Storage Tanks (USTs)/ Aboveground Storage Tanks (ASTs)

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding underground storage tanks (USTs) and aboveground storage tanks (ASTs). Each center operator, Center Director, and Safety Officer must coordinate to ensure that all ASTs and USTs comply with 40 CFR Parts 112 and 280, and all applicable state requirements.

Strategy:

- Interview the Safety Officer. Do the tanks meet current federal and state requirements?
- Is the aboveground tank surrounded by a containment system that would prevent environmental contamination if the tank were overfilled or began to leak?
- Are there signs of leaking fuel oil or other hazardous materials?
- Has the center experienced a UST/AST leak, spill, or release?
- How was the situation handled?
- Were necessary corrective actions taken to prevent future incidents?
- How often are the tanks inspected?
- Who performs the inspection?
- Were deficiencies identified and how were they corrected?
R4. Lead

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding lead-containing building materials.

Lead was a common paint additive used until 1978. Due to the age of many Job Corps center facilities, it is assumed that lead-based paint is present in buildings constructed prior to 1978 unless testing has proven otherwise. Centers that plan to disturb a surface that may contain lead must perform dust, air, and/or water sampling to determine the potential for exposure to lead. Centers in which there is a potential exposure to lead by students, staff, or young children (in child development or residential facilities) must develop a written lead-based paint compliance program in conformance with 29 CFR 1926.62 that includes the following:

1. Designation and training of a competent person, capable of identifying existing and predictable lead hazards in the surroundings or working areas and having the authority to take prompt corrective action.

2. Procedures to ensure that all CTST projects involving construction work will be tested for lead prior to initiation. No student or staff may be exposed to lead at concentrations greater than 50 micrograms per cubic meter of air (50 ug/m³) averaged over an eight-hour period.

3. Procedures for notifying staff and students of the health hazards of lead-based paint. Inventory documentation must be maintained on center and with the National Office of Job Corps and Regional Office Project Manager.

4. Appropriate hazard warning will be posted in all regulated areas.

5. Annual student and staff awareness training will be provided in accordance with the minimum requirements of 29 CFR 1926.62.

Strategy:

➢ Does the center have buildings with lead-based paint?

➢ Are there signs posted in these areas?

➢ Are staff and students aware of lead-based paint hazards on center?

➢ Who is the lead-based paint coordinator/competent person?

➢ Are licensed contractors used to sample and remove lead-based paint prior to the start of CTST projects?

➢ Is there a lead-based paint inventory available?

➢ Who maintains the inventory?

➢ Is it current?
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Rationale for Rating:

### R5. Asbestos Operations and Maintenance

- **a.** Centers must comply with federal, state, and local regulations and Job Corps policy regarding asbestos-containing building materials (ACBM).
- **b.** ACBM not immediately removed must be managed as part of an Asbestos Operations and Maintenance (O&M) program, in conformance with 29 CFR 1910.1001 and 40 CFR Part 763. Centers in which there are buildings containing ACBM must have an O&M program that includes the following:
  
  1. Documentation, including copies of the initial asbestos survey report, subsequent ACBM surveys or inspection reports, and all asbestos abatement records, and laboratory analysis and exposure monitoring results must be maintained on center in a centralized asbestos record depository indefinitely, and made available upon request.
  
  2. Designation of an Asbestos Coordinator who must be responsible for ensuring compliance with all asbestos regulations and policies. The designated Asbestos Coordinator must receive initial training in asbestos O&M within one month of appointment. Training must consist of a minimum of 16 hours of both classroom and practical asbestos O&M training provided by an EPA-accredited training provider.
  
  3. Provide annual asbestos awareness training for all employees (including custodial and maintenance employees) and contract employees. Initial training must consist of a minimum of two hours of training in accordance with 29 CFR 1910.1001(j) within one week of hire.
  
  4. Annual refresher training for the Asbestos Coordinator and all custodial/maintenance employees. Documentation of training must be maintained in the central asbestos record depository as well as the individual’s personnel file.
  
  5. Notification of the presence of asbestos within center buildings to all students and employees at least annually through a written notice or posting of a statement in the common areas of all buildings containing asbestos. The notice must contain a brief description of the location and

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type of ACBM, and the name and contact information for the designated Asbestos Coordinator.

6. Posting of asbestos warning signs in all mechanical rooms, crawlspaces, custodial closets, or other work areas where maintenance or custodial employees may come into contact with ACBM. Warning signs must meet the requirements specified in 29 CFR 1910.1001, and must be posted so as to be visible immediately upon entering the room or workspace.

7. Include employees and contract employees working in areas where ACBM is present in the center’s respiratory protection program and medical surveillance program.

8. Inspection of all ACBM in center buildings at least twice each year to verify the physical condition and identify any significant damage. Evidence of significant damage and/or other deterioration in physical condition that presents a potential health hazard must be reported to the National Office of Job Corps and Regional Office via the Significant Incident Reporting (SIR) system.

9. Repair or abatement of ACBM must be performed by licensed asbestos abatement contractors. Clean-up of damaged ACBM by Job Corps personnel is strictly prohibited.

10. Review and documentation of all CTST or center-managed renovation projects by the Asbestos Coordinator to ensure that no ACBM will be affected by the proposed project. The center’s Asbestos Coordinator will ensure that the proper warning signs are posted in the work area per 29 CFR 1910.1001.

Strategy:

- Does the center have buildings with asbestos?
- Are signs posted in these areas?
- Is staff informed about areas where building materials containing asbestos are located?
- Who is the Asbestos Coordinator?
- Who coordinates asbestos removal?
- Does he or she review Career Technical Skills Training projects for asbestos exposure?
- How do the CTST Coordinator and this individual ensure that students are not involved in asbestos abatement?
- Is there an Asbestos Operations and Maintenance Plan?
- Who maintains the plan?
- Is it current?
- Are licensed contractors used to sample and remove asbestos-containing building materials prior to the start of CTST projects?

November 10, 2011
Are staff members trained to do small-scale asbestos abatement activities, i.e., glove-bag techniques used to remove pipe insulation?

Identify the staff person who coordinates asbestos removal.

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Rationale for Rating:

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R6. **Hazard Communication**

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding chemical hazard communication. Each center operator, Center Director, and center Safety Officer must coordinate and ensure that hazards associated with the use of all chemicals produced or imported by chemical manufacturers or importers, and used by Job Corps students/staff, are evaluated. Such information concerning chemical hazards must be communicated to affected students and staff via a comprehensive written Hazard Communication program in accordance with 29 CFR 1910.1200. The Center Director must ensure that the Safety Officer or other designee structures the Hazard Communication program to include:

1. A complete chemical inventory or master list of chemical products used on center and a process to keep the inventory current. The inventory must include the name of the product and the location(s) where it is used. Ensure that students and staff know the location of the chemical inventory.

2. Organization and ongoing maintenance of Material Safety Data Sheets (MSDSs) for all chemical products purchased by or used at the center. MSDSs for chemical products used in a given area must be available to and easily accessible by all staff and students. MSDSs can be stored in a three-ring binder or be accessible via computer.

3. Clearly readable identifying labels securely placed on all incoming containers of hazardous chemical products, and such labels are not removed or defaced. Chemicals transferred to other approved containers must be labeled accordingly as well. Labels must contain at least:

   a. Product identification
(b) Hazard warning showing what parts of the body could be affected (HMIS or NFPA system)
(c) Name and address of the manufacturer or supplier

4. Supervisor/instructor maintenance of up-to-date MSDS file for each hazardous chemical product used within their respective areas.

5. Proper training and instruction delivered to all users of hazardous chemical products, including:
   (a) Identification of such products
   (b) The specific hazards associated with such products
   (c) Measures that users can take to protect themselves (including PPE requirements)
   (d) Methods and observations that may be used to detect the presence or release of hazardous chemicals
   (e) Potential physical health effects of chemicals used in the workplace

6. Proper communication of chemical hazards associated with non-routine tasks.

7. An established and approved chemical products purchase list. MSDSs must be reviewed by the Safety Officer before the products are used in the workplace.

Strategy:
- Has the center conducted an inventory of all chemical products currently used on center?
- Does the center have a current MSDS for all chemical products currently used on center?
- Does the center properly dispose of chemical products currently not in use?
- Is there an inventory or list of chemical products no longer used on center?
- Is there an MSDS for chemical products no longer in use?
- What type of labeling system is used on center, NFPA (diamond) or HMIS (rectangle)?
- Who is responsible for managing the Hazard Communication program?
- Does the Safety Officer review the MSDS for chemicals before the products are used on center?
R7. Mercury


1. Each center operator, Center Director, and Safety Officer must coordinate to ensure that all sources of mercury have been identified and are properly disposed of in accordance with the local/state health department or department of the environment regulations.

2. All mercury-containing paints, batteries, thermometers, blood pressure meters, thermostats, light ballasts, etc., currently in use should be replaced when it is fiscally possible. Center students/staff are strictly prohibited from attempting to clean up spills or releases. Clean-up must be performed by the local fire department, hazmat team, or a licensed contractor.

Strategy:

➢ Has the center properly disposed of and replaced mercury-containing paints, batteries, blood pressure meters, thermostats, light ballasts, etc.?

➢ What is the center’s procedure for responding to mercury spills or releases?

➢ Interview students and staff. Are students and staff aware of mercury hazards on center?

➢ Do they know what to do if there is a spill or release?
R8. **Freon 113 and Other Ozone-Depleting Chemicals**

a. Centers must comply with federal, state, and local regulations and Job Corps policy regarding Freon 113 and other ozone-depleting chemicals in the replacement and disposal of air conditioning and refrigeration units.

b. Air conditioning and refrigeration units installed before 1995 that may contain ozone-depleting chemicals must be disposed of in accordance with federal and state hazardous materials regulations.

**Strategy:**

- Does the center have air conditioning and/or refrigeration units built and installed before 1995?
- Is the center planning to replace these units when it is fiscally possible?
- Is the center using EPA-certified technicians to service and maintain pre-1995 air conditioning and/or refrigeration units?
- Is the center participating in the EPA refrigerant recycling program?

R9. **Hexavalent Chromium**

a. Centers must comply with OSHA standard 29 CFR 1910.1026 and Job Corps policy regarding hexavalent chromium (Cr(VI)).
1. Centers that offer trades that may potentially expose students/staff to hexavalent chromium (Cr(VI)) must develop, implement, and maintain an exposure control plan that contains the following minimum requirements:
   (a) Trade(s) or center functions that may result in exposure
   (b) Exposure-monitoring results for the affected trade(s) or center functions
   (c) Engineering controls used to maintain Cr(VI) concentrations below the Permissible Exposure Limit (PEL) and action level
   (d) Personal protective equipment (PPE) required during performance of training or center function
   (e) Method(s) of communicating hazards associated with Cr(VI) (See Hazard Communication Training, Section 5.16, R6)

2. Centers offering the welding trade must perform one round of initial and confirmation exposure monitoring no matter how often welding of stainless steel occurs. No additional monitoring is necessary if both the initial and confirmation sample results are below the PEL of 5.0 µg/m³ and the action level of 2.5 µg/m³ calculated as eight-hour time-weighted averages (TWAs).


Strategy:
- Does the center offer trades that may potentially expose students/staff to Cr(VI)?
- Has the center completed the required exposure monitoring?
- Does the center have an approved Cr(VI) Exposure Control Plan?
- Are students and staff aware of the health hazards associated with exposure to Cr(VI)?
- Has the center performed an MSDS review to identify products that contain Cr(VI)?
- Does the center have an exemption from compliance requirements issued by the National Office of Job Corps?

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Rationale for Rating:

November 10, 2011
QUALITY INDICATOR(S)

Q1. Centers comply with federal, state, and local regulations and Job Corps policy regarding environmental hazards.

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5.17 FOOD HANDLING AND STORAGE, PEST CONTROL, UNSANITARY CONDITIONS, AND WATER TREATMENT

PURPOSE

P1. To ensure that students and staff work and live in environmentally healthy surroundings.

P2. To provide a training, living, and working environment that ensures the occupational safety and health of students and staff.

REQUIREMENTS

R1. Food Handling

Centers must ensure that food handling practices comply with the state, local, or U.S. Public Health Service Food Code, whichever is more stringent. Centers must develop and implement a Hazard Analysis and Critical Control Point (HACCP) program as outlined in Annex 4 of the U.S. Public Health Service Food Code. All meat products must meet U.S. Department of Agriculture standards.

Strategy:

➢ Observe food service practices for the following:

   o Food service workers wearing hair nets, gloves, and aprons
   o Food items stored properly
   o Ice filters on automatic ice machines
   o Dishware storage in upright position
   o Lack of pests in food services and culinary arts areas (frequent pest control service utilized and documented)
   o Fly fans at entrances to food service area
   o Proper hot water temperature for dishwashers

➢ Review quarterly environmental health inspections, annual DOL safety inspections, and the center’s weekly safety and health inspection reports. Are there building code violations?

➢ Are the corrective actions designed to prevent future occurrences?

➢ Review the most recent local health inspection reports. Are there violations?

➢ If so, how did the center address them?

➢ Review previous reports and determine if the center has a history of compliance or non-compliance with local requirements.

November 10, 2011
R2.  **Food Storage**

Centers must ensure that storage of food complies with the state, local, or U.S. Public Health Service Food Code, whichever is more stringent, and does the following:

a. Storage areas protect food from the elements, fire, rodents, insects, organisms, and other causes of spoilage.

b. Chemicals, soaps, and poisons are properly labeled in accordance with Hazard Communication Standard (29 CFR Part 1910.1200) and stored separately from food.

c. Storerooms are well ventilated, and food items are stored a minimum of six inches above the floor in a manner that protects the food from splash, dust, and other contamination and permits easy cleaning of the area. Exceptions are:
   1. Metal pressurized beverage containers and cased food packaged in cans, glass, or other waterproof containers, and milk containers in plastic crates.
   2. Containers stored on dollies, racks, or pallets, provided such equipment is easily moveable.

d. Storerooms are free of exposed or unprotected sewer lines, water lines (except automatic fire protection sprinkler heads), uninsulated steam lines, water heaters, refrigeration condensing units, or other heat-producing devices.

e. All refrigeration equipment (refrigerators and freezers) must be monitored to ensure proper temperature ranges are maintained at all times.

f. Open food containers, cooked and fresh, are covered, labeled, and dated to ensure proper usage.

Strategy:

- Visit food storage areas. How is food stored?
- Are MSDS sheets available?
- Is there the potential for cross contamination of meats and vegetables?
- Are cleaning materials properly stored?
Are refrigerators and freezers maintained at the proper temperature?
Are the dry goods storage areas properly ventilated?
Are the dry goods placed on racks or pallets off the floor?
Are their signs of rodents and other pests?

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Rationale for Rating:

**R3. Pest Control**

Centers must:

a. Take adequate measures to control insects and rodents in all areas. Only pesticides that are safe for use in food service areas shall be used in food service facilities.

b. Ensure that pesticides are applied only by a licensed professional pest control contractor in food service, residential, and education facilities. The following information must be obtained from the contractor and kept on file for at least three years:
   1. Name/type of chemicals used
   2. Amount of chemical applied
   3. Areas where applied and amount specific to location
   4. Date when applied
   5. MSDSs for the chemicals used

c. Ensure that pesticides are not stored for usage on centers except those that are approved by EPA for use in landscaping and gardening projects. Proper training on storage, use, and application of these chemicals must be provided to staff and students.

Strategy:

- Check pest control plan; how often does the center arrange for pest control services?
- Who performs the pest control application?
- Check MSDS sheets for pesticides used.
Is staff properly trained in the safe application of pesticides?
Are staff members provided with appropriate PPE for use during pesticide application?

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Rationale for Rating:

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**R4. Unsanitary Conditions**

In accordance with Section 5(a) of the Occupational Safety and Health Act of 1970, centers must ensure that staff and students are not required or permitted to reside, work, be trained, or receive services in buildings or surroundings that are unsanitary, hazardous, or lack proper ventilation.

Strategy:
- When walking through facilities, check for cleanliness of areas. Are signs posted in hazardous areas? Is there a plan to remediate any pending issues?
- Observe the state of cleanliness of residential and dining areas at various times during the day and evening. Are students actively involved in the care of the facilities?
- Is maintaining cleanliness a priority?
- Interview students and staff to determine the usual practices for maintaining a healthy living environment.

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R5. Water Treatment

Centers must ensure that when non-municipal water and waste treatment facilities are used, the following requirements are met:

a. Water supplies meet center needs and satisfy National Primary Drinking Water Regulations (40 CFR 142).

b. Prior to construction or renovation, the standards or regulations of federal, state, and local health authorities are consulted. Renovation/building plans and specifications are sent to the National Office of Job Corps, with a copy to the Regional Office, for review.

c. Records are maintained showing the amount of water treated, amount of chlorine used, daily free chlorine residual, and other data pertaining to water treatment.

d. All required bacterial and chemical tests are performed by state or local health authorities, with the exception of the daily routine residual chlorine test that is to be conducted by center staff.

e. The center complies with the water quality and related standards of the state and with the standards established by the Federal Water Pollution Control Act 33 U.S.C. 1251 et seq.

f. Records are maintained documenting the water/wastewater treatment pursuant to standards set by the EPA and local authorities and should be maintained on center indefinitely. Waste treatment problems are brought to the attention of the appropriate EPA Coordinator and the Regional Office.

g. Records of influent and effluent monitoring data are maintained as required by the plant’s effluent discharge permit and other data pertaining to wastewater treatment.

h. The analysis of all influent and effluent, as required by the discharge permit, is performed by a certified laboratory.

Strategy:

- Review the center’s SOPs or maintenance plan to ensure that it includes the listed systems.
- Is there public water or well water?
- How is well water maintained?
- Are plans for construction or renovation of water treatment facilities sent to the National Office of Job Corps with a copy to the Regional Office for review?
- Are water treatment records properly maintained?
- Are bacterial and chemical tests performed by state or local health authorities?
- Are records of tests performed by state and local health authorities properly maintained?
- Are influent and effluent records as required by the center’s effluent discharge permit properly maintained?
- Is the required analysis of influent and effluent performed by a certified laboratory?
Are analysis results properly maintained?

How are water treatment deficiencies discovered through testing and analysis resolved?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Centers comply with federal, state, and local regulations and Job Corps policy regarding food sanitation and water treatment standards.

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Q2. Residential and dining facilities are clean and neat in appearance.

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5.18 STUDENT AND STAFF INJURY REPORTS AND RECORDKEEPING

PURPOSE

P1. To ensure documentation of compliance with required elements of the center’s Occupational Safety and Health program and ensure compliance with OSHA and all other applicable statutes.

P2. To notify appropriate officials that an injury, occupational illness/disease, or death has occurred.

P3. To record hazards identified and corrective actions taken, indicate trends, and provide a basis for formulating future plans.

P4. To permit an evaluation of progress being made in preventing accidents.

P5. To document incidents for assurance of proper medical treatment and potential processing of claims.

REQUIREMENTS

R1. Student Injury, Occupational Illness/Disease, and Fatality Recordkeeping

Note: Occupational illness/disease in this context is defined as illness or disease acquired from/due to the Job Corps training and/or living environment (e.g., hearing loss, coronary/vascular condition, asbestos-related illness, carpal tunnel syndrome, etc.).

Student injuries and occupational illnesses/diseases must be documented in the Department of Labor’s Safety and Health Information Management System (SHIMS). SHIMS is an electronic database that assists the Department in meeting the reporting requirements of both the Occupational Safety and Health Administration (OSHA) and the Office of Workers’ Compensation Programs (OWCP). The only injuries and occupational illnesses/diseases that should not be documented in SHIMS are those that occur while the student is:

- At home on pass or leave;
- Engaged in leisure time employment; or
- AWOL.

Regardless of the severity of the injury or occupational illness/disease, an incident will minimally require the submission, in SHIMS, of the two documents below:

- The OSHA 301, Injury and Illness Incident Report; and
- One of the forms below:
  1. OWCP CA-1, Notice of Traumatic Injury and Claim for Compensation
  2. OWCP CA-2, Notice of Occupational Disease and Claim for Compensation. The CA-2 submission is rarely used; if you think a CA-2 is warranted, contact the National Office.
Student fatalities are not documented in SHIMS. These incidents should be reported to the National Office of Job Corps immediately. Centers are required to complete the OWCP CA-6 manual form. The National Office will complete any other recordkeeping requirement.

A complete list of the OSHA and OWCP forms, and a description of their use, are below. Please note that all occupational safety and health records must be maintained for a five-year period, unless otherwise indicated by a specific OSHA standard, the Department of Labor Manual Series (DLMS), or the PRH.

**Electronic Forms Submitted in SHIMS**

a. **OSHA 301, Injury and Illness Incident Report**, is completed in SHIMS for each student injury or occupational illness in accordance with 29 CFR 1904. The OSHA form is required to be retained for five years.

b. **OSHA 300, Log of Work-Related Injuries and Illnesses**: For OSHA 301 Incident Reports that are work-related (see definition in criterion 1, below), centers must maintain a single current log in SHIMS, known as the OSHA 300 Log. For an incident to be entered in the OSHA 300 Log, it must meet each of the three OSHA-recordable criteria below:

1. The injury or occupational illness is work-related. For Job Corps purposes, this means that the injury or occupational illness occurred while the student was involved in training or educational activities;
2. The injury or occupational illness represents a new case in the system; and
3. The injury or occupational illness results in one or more of the following:
   (a) Days away from work (training or educational activities)
   (b) Restricted work or transfer to another job
   (c) Medical treatment beyond first aid
   (d) Loss of consciousness
   (e) A significant injury or illness diagnosed by a physician or other licensed health care professional
   (f) A needlestick or sharp injury exposing the student to another person’s blood or potentially infectious material
   (g) A Standard Threshold Shift (STS) in hearing in one or both ears where the employee’s total hearing level is at least 25 decibels above audiometric zero in the same ear(s) as the STS
   (h) Exposure to persons with a case of active tuberculosis (TB), where the student subsequently develops a TB infection.

Student injuries resulting from horseplay while engaged in training or educational activities must be recorded as well. For example: two students, while participating in welding instruction, engage in playful teasing and pushing. One student becomes angry and the teasing escalates to a fight. One student is injured,
resulting in medical treatment beyond first aid. The student injury must be recorded in the OSHA 300 Log in SHIMS.

The OSHA 300 Log is required to be retained for five years.

c. **CA-1, Notice of Traumatic Injury and Claim for Compensation**, is completed in SHIMS within seven calendar days of supervisor notification.

In the event that an injury requires separation from Job Corps, center staff must obtain National Office approval prior to forwarding a CA-1 to OWCP. When the CA-1 is filed with OWCP at separation, a CA-16 manual form, Authorization for Examination and/or Medical Treatment, and an OWCP-1500 manual form, the Health Insurance Claim Form, are sent to the provider. If the injury is not severe enough to cause separation, the CA-1 should be completed, electronically filed in SHIMS within seven calendar days of supervisor notification, printed, signed by the student, and filed in the student’s health folder.

d. **CA-2, Notice of Occupational Disease and Claim for Compensation**, is rarely used in Job Corps because there are very few cases of occupational disease or illness related to enrollment in Job Corps. If such a situation does occur, contact the National Office of Job Corps before filing a CA-2.

**Manual Forms**

e. **CA-6, Official Supervisor’s Report of Employee’s Death**, is filed with the OWCP district office if a student dies as a result of an illness/injury incurred while in performance of duty. In the event of a student fatality, the Center Director should notify OWCP immediately by telephone or fax and mail the CA-6 to the OWCP district office. Do not document student fatalities in SHIMS.

The Center Director must report student fatalities to the National and Regional Offices within six hours of the event via Significant Incident Report (SIR).

f. **CA-7, Claim for Compensation Due to Traumatic Injury or Occupational Disease**: Unlike other federal employees, Job Corps students are not eligible for continuation of pay for 45 days. However, they may submit a CA-7 after medical separation to receive compensation for injury or illness. The center should complete the CA-7 and have the student sign and date Section 7 of the form. In the event that the student is unable to sign the CA-7, the Center Director may sign as his or her authorized representative.

Upon National Office approval to forward a CA-1 or CA-2 to OWCP in SHIMS, the center should fax or e-mail a copy of the completed CA-7 to the National Office for submission to OWCP. The National Office must file the copy sent to them by the center with OWCP within five days of the student’s signature.

The original CA-7, signed by the student, should be filed in the student’s health folder.

g. **CA-16, Authorization for Examination and/or Treatment**: Whenever a student separates from Job Corps and needs examination and/or treatment as a
result of traumatic injury, the Center Director should issue a CA-16 to the physician or medical facility. This form authorizes the injured student’s examination and/or treatment from a physician or medical facility. When a CA-2 is electronically submitted to OWCP in cases of separation because of work-related illness or disease, a CA-16 is issued only if prior approval is obtained from OWCP. If a CA-16 is submitted, do not submit a CA-20.

This form provides OWCP with an initial medical report and the physician or medical facility with a billing form for emergency treatment. Issuance of the CA-16 authorizes OWCP to pay medical expenses incurred.

Part A is completed by the student’s supervisor and submitted to the physician or medical facility within 48 hours of examination and/or treatment. Part B is completed by the attending physician as promptly as possible after initial examination and sent to the appropriate OWCP district office.

When there is a need for medical follow-up for the work-related injury by a second health-care provider, the center should mail the name and address of that provider to OWCP or instruct the student (in writing) to do so.

h. OWCP-1500 (also known as HCFA-1500)—Health Insurance Claim Form:
This form accompanies the CA-16 to all medical care providers, except hospitals. It is issued by health-care providers to bill the OWCP district office for services rendered.

i. CA-20, Attending Physician’s Report: This report provides medical support of claims for compensation. It is submitted to OWCP upon completion of the medical examination and treatment. It is also used to provide additional medical information regarding the claim. If a CA-20 is submitted, do not submit a CA-16.

Strategy:

- Have injuries to staff and/or students occurred?
- Is there an established process for reporting student injuries to the SHIMS Recordkeeper, i.e., student→staff→SHIMS Recordkeeper?
- Interview SHIMS Recordkeeper. What is the process for reporting a student injury?
- Is the center documenting student injuries in SHIMS? Verify by identifying CA-1s (from SHIMS) filed in student medical folders and/or check SHIMS for filed cases.
- Are SHIMS entries appropriate? Verify that the center is filing SHIMS for injuries and not diseases/illnesses or incidents in which there was no injury.
- What type of injuries are students sustaining, and is there a pattern?
- If so, has the center implemented any new policies to address it?
- Are injuries reported as required via the Significant Incident Report (SIR) system?
Did the center forward CA-1s for students medically separated due to injury, and complete and submit the CA-16 and CA-7 as required? Verify by checking SHIMS and the student’s medical folder.

Did the center complete the CA-6 in the event of a student death?

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Rationale for Rating:

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**R2. Definitions and Procedures for Handling Job Corps Student Injuries**

**a. Job Corps Injuries Designated “First Aid”**

1. First aid is defined as any one-time treatment, and any follow-up visit for the purpose of observation, of minor scratches, cuts, burns, or splinters, which does not ordinarily require medical care. Such one-time treatment and follow-up visits are considered first aid even if they are provided by a physician or other registered professional personnel.

2. First aid injuries must be documented in SHIMS.

3. The following procedures are generally considered first aid treatment (e.g., one-time treatment and subsequent observation of minor injuries):

   (a) Application of antiseptics during initial visit to medical personnel

   (b) Treatment of first degree burn(s)

   (c) Application of bandage(s) during any visit to medical personnel

   (d) Use of elastic bandage(s) during initial visit to medical personnel

   (e) Removal of foreign bodies from wound if procedure is uncomplicated (e.g., by tweezers or other simple technique)

   (f) Use of nonprescription medications and administration of single dose of prescription medication on initial visit for minor injury or discomfort

   (g) Soaking therapy on initial visit to medical personnel or removal of bandages by soaking
(h) Application of hot or cold compress(es) during first visit to medical personnel

(i) Application of ointments to abrasions to prevent drying or cracking

(j) Application of heat therapy during first visit to medical personnel

(k) Negative x-ray diagnosis

(l) Observation of injury during visit to medical personnel

4. The administration of a tetanus shot or booster by itself is not considered medical treatment. However, these shots are often given in conjunction with more serious injuries; consequently, injuries requiring these shots may be filed in SHIMS for other reasons.

b. More Serious Injuries Not Resulting in Student’s Separation

1. This category includes injuries that result in medical treatment beyond first aid, but do not require a medical separation but are serious enough to need a specialized referral.

2. An example of this type of injury would be: a student sustained a strain or sprain, but is able to continue training with restrictions.

3. These injuries must be documented in SHIMS.

Some examples of this category of injury are:

(a) Fractures

(b) Head injuries with loss of consciousness

(c) Positive x-ray diagnosis

(d) Lacerations with nerve or tendon damage

(e) Injuries needing sutures/SteriStrips/adhesive butterfly

(f) Foreign body embedded in the eye

(g) Jaw fractures/dental damage

(h) Treatment of infection

(i) Treatment of 2nd or 3rd degree burns

(j) Food poisoning

(k) Dislocated shoulder

c. Injuries Resulting in Separation From Job Corps

1. This category includes injuries resulting in the student’s death or serious injuries that result in the student’s separation from Job Corps.

2. An example of this type of injury would be: a student sustained a traumatic injury in the performance of duty that requires surgery, additional medical treatment that can not be provided on center, or the student can no longer perform in the program.
3. These injuries must be documented in SHIMS.

4. Section 8143 of the Federal Employees’ Compensation Act (FECA) states that while students are enrolled in Job Corps, students are considered employees of the federal government for purposes of medical coverage under FECA. The “performance of duty” does not include an act of an enrollee while absent from his or her assigned post of duty, except while participating in an activity (including an activity while on pass or during travel to or from the post of duty) authorized by or under the direction and supervision of Job Corps.

Strategy:

➢ Are student injuries appropriately classified as “first aid,” “not medically separated,” and “medically separated”?

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Rationale for Rating:

R3. **Staff Injury, Occupational Illness/Disease, and Fatality Recordkeeping**

Note: Staff is defined as all contractors, federal employees, and temporary employees who work at a Job Corps center.

All work-related staff injuries and occupational illnesses must be documented in the Department of Labor’s Safety and Health Information Management System (SHIMS) in accordance with 29 CFR 1960 Subpart I and 29 CFR 1904. These regulations require that a single OSHA 300 Log be maintained for each federal agency establishment; each Job Corps center is classified as an establishment. As such, all work-related injuries and occupational illnesses suffered by federal employees and contractors at the establishment must be captured on the same OSHA 300 Log. This requirement has no bearing on the requirements of the corporate office or other federal agency.

Centers are only required to report the death of a staff member if the fatality occurs while in duty status on or off center. The Center Director must report staff deaths to the National and Regional Offices within six hours of the event via Significant Incident Report (SIR).

**A CA-1 or CA-2 is never completed for staff in the Department of Labor’s SHIMS.**

November 10, 2011
a. **OSHA 301, Injury and Illness Incident Report**, is completed in SHIMS for each staff injury or occupational illness in accordance with 29 CFR 1904. The OSHA form is required to be retained for five years.

b. **OSHA 300, Log of Work-Related Injuries and Illnesses**: All centers must maintain a single current log in SHIMS of all work-related accidents, injuries, and occupational illnesses incurred by students and staff in accordance with 29 CFR 1904. The OSHA 300 Log is required to be retained for five years. Staff injuries resulting from horseplay while engaged in work-related tasks or activities must be recorded as well. For example: two staff members engage in playful teasing and pushing while repairing a piece of equipment. One staff member becomes angry and the teasing escalates to a fight. One staff member is injured, resulting in medical treatment beyond first aid. The staff injury must be recorded in SHIMS.

**Strategy:**

- Are staff injuries documented in SHIMS?
- Are staff injuries recorded to the center’s OSHA 300 Log, which is maintained in SHIMS?

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**Rationale for Rating:**

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**R4. OSHA Form 300A, Summary of Work-Related Injuries and Illnesses**

Each year, Job Corps centers are required to post OSHA Form 300A, also called the OSHA 300A Summary, from February 1 through April 30 in accordance with 29 CFR 1904.32. OSHA Form 300A summarizes data contained in the OSHA 300 Log, which is maintained electronically in SHIMS, for the calendar year just prior to posting for the purpose of notifying students and staff of the injuries that have occurred on center. This report may be generated through SHIMS reports.

Following the required three-month posting period, the OSHA 300A must be retained for five years.
Strategy:

➢ Does the center generate the OSHA Form 300A each year and post it from February 1 through April 30?

➢ Does the center retain the OSHA 300A for five years?

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Centers document student and staff injuries and occupational illnesses in accordance with federal, state, and local regulations and Job Corps policy.

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Rationale for Rating:

Q2. Centers report all staff and student injuries and fatalities within the time frames required by federal standards and Job Corps policy.

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Rationale for Rating:

November 10, 2011
PRH 5.18 Summary Rating:

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5.19 VEHICLE SAFETY AND ACCIDENT RECORDKEEPING

PURPOSE

P1. To ensure student and staff safety while traveling in government vehicles on and off center.

P2. To ensure documentation of accidents involving government vehicles.

REQUIREMENTS

R1. **Overview of Center Director Responsibilities**

Each Center Director must be responsible for:

a. Administration of the motor vehicle safety program.

b. A program for training, testing, and licensing students.

c. A comprehensive vehicle maintenance and inspection program.

d. Promotion and incentive awards programs to encourage traffic safety.

e. Compliance with state and local motor vehicle laws.

f. An effective accident investigation and analysis system.

g. An on-center system of traffic control to include appropriate signs and lines.

Strategy:

- Is the Center Director actively involved in managing the center’s motor vehicle safety program?
- Does the center have a program for training, testing, and licensing students?
- Is there a comprehensive vehicle maintenance and inspection program?
- Are vehicles that do not pass the vehicle inspection taken out of service for repair?
- Is there an incentive awards program to encourage and promote traffic safety?
- Are center drivers complying with state and local motor vehicle laws?
- Who is responsible for paying fines and penalties for parking and/or moving violations incurred while driving center vehicles?
- What disciplinary action(s) are taken against center staff for parking and/or moving violations while operating center vehicles?
- Is there a motor vehicle accident investigation and analysis program in place?
- Is there an on-center system of traffic control, including appropriate signs and lines?
R2. Overview of Requirements

a. Government-owned or leased vehicles (collectively, GOV) shall be operated by individuals meeting the following qualifications:

1. Drivers must possess a valid state driver’s license.
2. Drivers must possess a valid federal employee identification or Job Corps identification.

b. Student operation of GOV must be authorized by the Center Director and limited to driver’s training only.

c. All over-the-road vehicles must be equipped with fire extinguishers, emergency warning lights, and well-maintained first aid kits.

d. In GOV, all drivers and passengers must wear seat belts in all over-the-road vehicles (except buses where seat belts are not available). When infants and/or children are being transported, safety restraints must meet applicable state requirements for size/weight.

e. Drivers shall not engage in text messaging, or use personal or government-supplied electronic equipment, when operating GOV or when driving privately-owned vehicles (POV) while on official government business.

f. No vehicle will be loaded (with personnel or materials) beyond the vehicle’s rated capacity.

g. All operators shall adhere to applicable federal, state, and local vehicle operator licensing and safe operator requirements. Federal requirements may include, but are not limited to, Hours of Service (Part 395 of the Federal Motor Carrier Safety Administration [FMCSA] regulations).

h. Students will not be transported in the back bed of a pickup truck or other open-bed vehicle, including vehicles equipped with caps covering the bed of the truck, unless such vehicle has been equipped with appropriately designed and constructed seating and safety restraints.

i. If a bus has an auxiliary gas tank that powers the air conditioner, the vehicle must have that tank properly guarded.
j. Aisles in buses and vans must be kept free of obstructions that may hinder orderly evacuation of the vehicle during an emergency. Passengers must be seated at all times. Tools, equipment, luggage, and other personal belongings must be properly stored and secured before operating the vehicle.

k. No bus transporting students or staff shall have the emergency door locked or constricted.

l. All vehicles that are driven by staff and students on center must meet appropriate federal and state safety requirements.

m. While a commercial driver’s license (CDL) is preferred for those drivers operating 12- and 15-passenger vans, operators must, at a minimum, adhere to the vehicle operator licensing and safe operator requirements for the state or local jurisdiction.

n. All 12-passenger vans currently leased or owned by Job Corps contractors and agencies are to be operated in a manner that reduces the risk of vehicle rollover and other known risks associated with operating the vehicles. Job Corps contractors and agencies are permitted to purchase new vans and retain 12-passenger vans that are currently in their GSA fleet inventory. The vans shall be operated in accordance with the guidelines and restrictions detailed below:

1. The 12-passenger vans will carry a maximum of eight passengers, including the driver. If there is a need to transport more than eight passengers, it must be done using multiple vehicles.

2. Roof racks must be removed, except those that carry only light loads (e.g., ladder rack, rowing oars, etc.). No loads over 60 pounds should be placed on the roof.

3. Rear seats must be removed.

o. All 15-passenger vans currently leased or owned by Job Corps contractors and agencies are to be modified and operated in a manner that decreases known risks associated with operating the vehicles. Job Corps contractors and agencies are permitted to retain 15-passenger vans that are currently in their GSA fleet inventory in accordance with the guidelines and restrictions detailed below; however, centers are encouraged to explore other fiscally responsible transportation options before purchasing, leasing, or renting additional 15-passenger vans.

1. All 15-passenger vans will carry a maximum of 10 passengers, including the driver. If there is a need to transport more than 10 passengers, it must be done using a higher capacity vehicle, or by using multiple smaller vehicles.

2. Roof racks must be removed, except those that carry only light loads (e.g., ladder rack, rowing oars, etc.). No loads over 60 pounds should be placed on the roof.

3. Rear seats must be removed.
Strategy:

- Are center students authorized to operate government-owned or -leased vehicles for activities other than driver training?
- What is the center’s policy regarding student use of center vehicles?
- Is center staff aware of the Executive Order banning texting while operating government-owned or -leased vehicles?
- Does the center have a written plan, policy, or standard operating procedures in place to communicate to students and staff about the ban on text messaging and use of government-issued electronic devices while operating government-owned or -leased vehicles?
- Does the center communicate to staff and students about the ban on text messaging and use of government-supplied electronic devices while operating privately-owned vehicles while on center/government business?
- Does the center comply with the Hours of Service (Part 395 of the Federal Motor Carrier Safety Administration [FMCSA] regulations)?
- Does the center own or operate pickup truck or other open-bed vehicle(s), including vehicles equipped with caps covering the bed of the truck?
- Are these vehicles equipped with appropriately designed and constructed seating and safety restraints to allow for safe transport of students in the back bed of the vehicle?
- Does the center own or operate 12- and/or 15-passenger vans?
- Does the center adhere to the vehicle operator licensing and safe operator requirements for the state or local jurisdiction.
- Do the 12- and/or 15-passenger vans have rear seats?

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Rationale for Rating:

**R3. Vehicle Accident Recordkeeping**

a. SF-91, Operator’s Report of Motor Vehicle Accident

The operator of any government vehicle involved in an accident will complete an SF-91 form at the scene of the accident, if possible. The center will develop procedures to ensure that copies of the SF-91, and other applicable forms, are
available in each vehicle, including privately owned vehicles, rentals, and GSA vehicles used for official business.

b. SF-91A, Investigation Report of Motor Vehicle Accident

This report is used for motor vehicle accidents resulting in vehicle and/or property damage over $500, or disabling work injuries including fatalities caused by a motor vehicle accident.

Strategy:

➢ Are there procedures in place to ensure that SF-91s and other applicable forms are available in all center vehicles?

➢ Are there procedures in place for reporting and investigating accidents involving center motor vehicles?

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Rationale for Rating:

QUALITY INDICATOR

Q1. Centers comply with federal, state, and local regulations and Job Corps policy regarding vehicle safety and recordkeeping.
PRH 5.19 Summary Rating:

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November 10, 2011
5.20 OCCUPATIONAL SAFETY AND HEALTH (OSH) PROGRAM AND WRITTEN PLANS

PURPOSE

P1. To develop, implement, and evaluate a Safety and Occupational Health program that includes written plans in accordance with 29 CFR 1960, the OSHA Act of 1970, Executive Order 12196, and Job Corps policy.

P2. To develop and document all of the plans described in the following requirements, if applicable.

REQUIREMENTS

R1. Personal Protective Equipment (PPE) Plan

In accordance with 29 CFR 1910.132, centers are required to develop, implement, and maintain a written PPE Plan and program that includes at least the following:

a. Perform hazard assessments for all trades and/or work areas to assess the need for personal protective equipment (PPE). Maintain hazard assessment records that identify hazards and risks, and document the type of PPE required. Develop procedures to notify the Safety Officer when new processes are introduced or when existing processes change.

   Note: If a new trade is introduced, a hazard assessment must be performed to determine PPE needs according to training activities. Hazard assessment based upon other trades and activities cannot be the bases of the PPE requirements for a new trade.

b. Select PPE based on hazard assessments by the trade supervisor in conjunction with the Safety Officer. Methods for selecting PPE are well-documented, appropriate, and properly implemented.

c. Develop a PPE training program that will address student and staff needs. The written training program includes:
   1. When PPE use is necessary.
   2. What PPE is necessary.
   3. How to properly don (put on), doff (remove), adjust, and wear PPE.
   4. The proper care, maintenance, useful life, and disposal of PPE.

d. Maintain PPE training records for students and staff for three years. Additional retention requirements are as follows:
   1. Retain student training records for one year following completion of training or termination of enrollment.
   2. Retain staff training records for one year following resignation or termination of employment.
e. Establish procedures to inspect, clean, and maintain PPE. Ensure that supervisors, staff, and students are trained in these procedures and follow the established criteria.

f. Establish procedures to remove damaged equipment from service.

Strategy:

- Does the center have a written PPE program?
- Does the plan include the following elements?
  1. When PPE use is necessary
  2. What PPE is necessary
  3. How to properly don (put on), doff (remove), adjust, and wear PPE
  4. The proper care, maintenance, useful life, and disposal of PPE
- Has the center performed a hazard assessment to determine the need for PPE?
- Are supervisors, managers, and career technical trade instructors involved in the hazard assessment?
- Are the results of the hazard assessment documented?
- Interview students: Are students knowledgeable about the PPE required for their career technical trade?
- Are the students able to demonstrate how to properly don (put on), doff (remove), adjust, and wear PPE?
- What are the procedures for removing damaged PPE from service?

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Rationale for Rating:

**R2. Fire Safety and Prevention Plan**


November 10, 2011
Centers will establish a policy, based upon the proximity to emergency response personnel (i.e., fire and/or hazardous materials response teams) that specifies full evacuation or incipient stage fire suppression by staff in response to a fire alarm.

a. Fire Prevention Plan

The center Safety Officer will perform the following activities to ensure that students and staff are familiar with all center fire alarms and evacuation procedures:

1. Center Safety Officers will perform and log monthly inspections of:
   (a) Fire alarm systems
   (b) Sprinkler systems
   (c) Illuminated exit signs
   (d) Emergency lighting
   (e) Fire extinguishers

2. Centers will conduct monthly fire drills during high student/staff activity levels and when students are in the dormitories. Center Safety Officers will document the accountability and timeliness of fire drills.

3. Centers will establish and implement a Fire Watch Plan, included as part of the Fire Prevention Plan, to be implemented when there is a nonfunctional alarm system. The Fire Watch Plan will include the following:
   (a) Establish fire warden and security staff duties and responsibilities
   (b) Establish minimum required equipment for security staff
   (c) Establish process for reporting fires and notifying building occupants

b. Fire Safety Plan Elements

The Safety Officer must ensure that at least the following elements are included in the Fire Safety Plan:

1. List of major fire hazards and proper handling and storage procedures for hazardous materials

2. List of all potential ignition sources, control procedures, and the type of fire protection equipment or suppression system used to control a fire

3. List of staff responsible for maintaining fire protection equipment or systems to prevent or control ignition fires

4. List of staff responsible for control of fuel source hazards

5. List of staff responsible for sounding alarms and contacting local fire department or other appropriate officials
6. Evacuation and accountability procedures, including the posting of evacuation maps, assembly areas, and maintaining safe distance from affected buildings until areas are cleared for occupancy

7. Emergency notification telephone numbers

8. List of temporary shelters and contacts

9. List of staff responsible for assessing damage to center and coordinating re-entry to center or affected buildings

10. List of staff responsible for communications with local media, Regional Office, and National Office of Job Corps

c. Training

All centers must provide ongoing fire prevention and fire extinguisher training for staff and students according to their roles and responsibilities within the fire prevention plan. Training resources include state or local fire marshals, insurance companies, universities, or the Occupational Safety and Health Administration (OSHA). Training programs must be tailored to center location, offerings, and programs, and must include the following elements, as appropriate:

1. Fire wardens and security staff
   (a) Fire classes and the appropriate extinguishing agent
   (b) Proper maintenance and use of fire extinguishers
   (c) Evacuation and accountability procedures, as defined by NFPA Life Safety Code
   (d) Proper use of warning equipment/alarm systems
   (e) Fire watch system and alternative warning systems
   (f) Fire warden responsibilities
   (g) Fire safety inspections, including housekeeping practices, flammable and combustible waste materials accumulation, and inspection and maintenance of fire equipment or systems

2. Students
   (a) Assigned evacuation routes and assembly areas
   (b) Procedures for reporting a fire or potential for fire
   (c) Procedures for disposal of combustible and flammable materials
   (d) Location of smoking areas and receptacles

3. Staff
   (a) Proper use of fire extinguishers
   (b) Assigned evacuation routes and assembly areas
   (c) Procedures for reporting a fire or potential for fire
   (d) Procedures for disposal of combustible and flammable materials
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(e) Location of smoking areas and receptacles

d. Documentation

Documentation of fire safety training, drills, and inspections must be maintained on center for three years and made available for review upon request.

e. Incipient Fire Suppression and Portable Fire Extinguishers

1. OSHA defines “incipient fire” as a fire in the initial or beginning stage that can be controlled or extinguished using a portable fire extinguisher, Class II standpipe, or small hose system without the need for protective clothing or equipment (e.g., breathing apparatus). OSHA requires centers to provide fire extinguishing equipment for incipient fire. However, OSHA allows centers to address incipient fires and building evacuation in two ways:

   (a) Evacuation of all or most of the building’s occupants to a safe area without attempting to fight the fire; or

   (b) Evacuation of all building occupants except those who are properly trained and designated to use portable fire extinguishers.

2. Fire prevention plans must comply with 1910.157, Portable Fire Extinguishers, according to the center’s established policy concerning incipient fires.

3. Incipient fire fighting should be based upon a thorough hazard assessment, and proximity and response time of local fire department or emergency response team.

Strategy:

➢ Does the center have a Fire Prevention Plan that includes monthly inspections of fire alarms, sprinkler systems, illuminated exit signs, emergency lighting, and fire extinguishers?

➢ Are monthly fire drills conducted?

➢ Are the results of the fire drills documented?

➢ Are procedures in place to make changes to improve fire drill evacuation times?

➢ Does the center have a written Fire Watch Plan?

➢ Does the center have a written Fire Prevention Plan that includes the following elements?

   1. List of major fire hazards and proper handling and storage procedures for hazardous materials

   2. List of all potential ignition sources, control procedures, and the type of fire protection equipment or suppression system used to control a fire

   3. List of staff responsible for maintaining fire protection equipment or systems to prevent or control ignition fires

   4. List of staff responsible for control of fuel source hazards

November 10, 2011
5. List of staff responsible for sounding alarms and contacting local fire department or other appropriate officials

6. Evacuation and accountability procedures, including the posting of evacuation maps and assembly areas, and maintaining safe distance from affected buildings until areas are cleared for occupancy

7. Emergency notification telephone numbers

8. List of temporary shelters and contacts

9. List of staff responsible for assessing damage to center and coordinating re-entry to center or affected buildings

10. List of staff responsible for communications with local media, Regional Office, and National Office of Job Corps

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Rationale for Rating:

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**R3. Emergency Action Plan**

Centers are required to develop an Emergency Action Plan (EAP) in accordance with 29 CFR 1910.38 if fire extinguishers are located in each building and students and staff are required to evacuate the building in the event of fire or other emergency.

a. Emergency Action Plan (EAP) Elements

1. Procedures to handle hazards and threats including:

   a) Natural disasters typical for the geographic area in which the center is located; e.g., earthquakes, hurricanes, tornadoes, severe/extreme weather, blackouts, utility failures, and weather-related conditions.

   b) Criminal activity including arson/fire, bomb threats, suspicious packages, vandalism, civil disturbance, and weapons on center.

   c) Terrorist threats including radioactive, biological, or cyber attacks.

   d) Medical emergencies, such as pandemic influenza or food poisoning (*E. coli* or *Salmonella*) outbreaks.
5.20-7 PAG Chapter 5: Management

(e) Other hazards specific to the surrounding area, such as hazardous materials spills or explosion.

2. A list of emergency personnel and contact information. The Center Director or his or her designee shall act as the responsible official during the emergency.

3. The Center Director or his or her designee must ensure that an Emergency Coordinator and area/floor monitors are identified, and ensure that assistance is available for the physically challenged.

4. Procedures for emergency situations that require centers to shelter-in-place, evacuate, and provide for mass care for students and staff.

5. Identification of assembly areas on and off center for students and staff to relocate depending upon the nature of the emergency.

6. Evacuation route maps indicating emergency exits, primary and secondary evacuation routes, location of fire extinguishers and fire alarm pull stations, and assembly points must be posted in all center buildings, including but not limited to:

(a) Residential facilities
(b) Child development centers, if applicable
(c) Academic facilities
(d) Food service facilities
(e) CTT facilities and classrooms
(f) Recreation areas
(g) Warehouse(s)
(h) Center maintenance
(i) Administration facilities

7. Procedures for staff required to remain on center after an evacuation to perform critical activities (e.g., shut down utilities) and secure the center.

8. Procedures to account for students and staff after evacuation to assembly areas on and off center, including students training or working off center at the time of the emergency.

9. Procedures for transporting students and staff to off-center assembly areas, including students training or working off center.

10. Procedures for staff and students responsible for providing medical assistance. The plan should also provide for instances when individuals responsible for providing medical assistance are not available.

11. An alarm system must be implemented that provides a distinctive sound or tone for each purpose (type of emergency and procedure) in accordance with 29 CFR 1910.165.
12. Procedures for returning the center to normal operations following an emergency. Procedures should be emergency-specific.

b. Emergency Response Drills

1. Centers must perform fire drills on a monthly basis. The drills should be performed during normal business hours and after hours.

2. Centers shall participate in federal, state, and local emergency preparedness drills, including terrorist attack and pandemic outbreak response, when possible.

3. Centers shall establish and maintain contact with federal, state, and local emergency response coordinators to ensure that current information regarding emergency response procedures is maintained.

4. All drill and post-drill activities designed to improve student and staff performance during drills must be documented and kept on file in the Safety Officer’s office and made available upon request.

5. Copies of drill performance and improvement reports must be maintained on the center for three years and made available for review upon request.

6. Centers shall coordinate with the local emergency management authority, local health department, and local fire department to participate in federal, state, or local emergency response drills.

Strategy:

➢ Does the center have a written Emergency Action Plan that includes the following elements?

1. Procedures to handle hazards and threats, including:

   (a) Natural disasters typical for the geographic area in which the center is located; e.g., earthquakes, hurricanes, tornadoes, severe/extreme weather, blackouts, utility failures, and weather-related conditions.

   (b) Criminal activity including arson/fire, bomb threats, suspicious packages, vandalism, civil disturbance, and weapons on center.

   (c) Terrorist threats including radioactive, biological, or cyber attacks.

   (d) Medical emergencies, such as pandemic influenza or food poisoning (*E. coli* or *Salmonella*) outbreaks.

   (e) Other hazards specific to the surrounding area, such as hazardous materials spills or explosion.

2. A list of emergency personnel and contact information. The Center Director or his or her designee shall act as the responsible official during the emergency.

3. The Center Director or his or her designee must ensure that an Emergency Coordinator and area/floor monitors are identified, and ensure that assistance is available for the physically challenged.
4. Procedures for emergency situations that require centers to shelter-in-place, evacuate, and provide for mass care for students and staff.

5. Identification of assembly areas on and off center for students and staff to relocate depending upon the nature of the emergency.

6. Evacuation route maps indicating emergency exits, primary and secondary evacuation routes, location of fire extinguishers and fire alarm pull stations, and assembly points must be posted in all center buildings, including but not limited to:
   (a) Residential facilities
   (b) Child development centers, if applicable
   (c) Academic facilities
   (d) Food service facilities
   (e) CTT facilities and classrooms
   (f) Recreation areas
   (g) Warehouse(s)
   (h) Center maintenance
   (i) Administration facilities

7. Procedures for staff required to remain on center after an evacuation to perform critical activities (e.g., shut down utilities) and secure the center.

8. Procedures to account for students and staff after evacuation to assembly areas on and off center, including students training or working off center at the time of the emergency.

9. Procedures for transporting students and staff to off-center assembly areas, including students training or working off center.

10. Procedures for staff and students responsible for providing medical assistance. The plan should also provide for instances when individuals responsible for providing medical assistance are not available.

11. An alarm system must be implemented that provides a distinctive sound or tone for each purpose (type of emergency and procedure) in accordance with 29 CFR 1910.165.

12. Procedures for returning the center to normal operations following an emergency. Procedures should be emergency-specific.

- Does the center perform hazard-specific emergency response drills?
- Are the results of the drills documented?
- Are procedures in place to make changes to improve emergency response drill evacuation times?
- Does the center participate in federal, state, and local emergency response planning committees?

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November 10, 2011
R4. **Hazard Communication Plan**
(See PAG Section 5.16, R6.)

R5. **Recreational Safety Plan**

a. Water Safety (See Chapter 3, Section 3.18, R5.)
   1. Job Corps centers operating swimming pools shall incorporate the Centers for Disease Control and Prevention (CDC) chlorine disinfection timetable for killing common germs.
   2. Cleaning and disinfecting procedures shall also include the area surrounding the pool, including chairs, towels, floors, etc., to prevent the onset of recreational water-related illnesses.
   3. Provide staff and students with awareness training on the prevention of recreational water-related illnesses.
   4. Ensure that swimming pool areas are secured after hours to prohibit unauthorized access.
   5. Post proper warning signs, safety rules, and emergency response procedures.
   6. Ensure that necessary rescue equipment is maintained in good working order and easily accessible.

b. General Recreational Safety

The Center Director must:

1. Ensure that students receive adequate training prior to engaging in recreational activities such as weight lifting, basketball, arts and crafts, etc.
2. Provide supervision during recreational activities to ensure that students follow proper techniques and are fit for the activity, thereby not placing the participant’s safety at above-normal risk and reducing the risk of injury.

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November 10, 2011
3. Advise students that “horseplay” is not tolerated during recreational activities.

4. Ensure that all recreational facilities and equipment are of safe design and free of known hazards.

5. Ensure that recreational and athletic equipment purchases meet safety guidelines established by agencies nationally recognized by the Consumer Product Safety Commission (CPSC).

c. Gymnasium and Recreational Equipment
   
   1. Gym equipment must be positioned to allow for an unrestricted route of egress from the area during an emergency.

   2. Personal protective equipment such as helmets, padding, wrap-around eye protection, and gloves must be provided for students involved in recreational activities such as:
      
      (a) Bicycling
      (b) Skateboarding
      (c) Rollerblading
      (d) Racquet ball

   3. Recreational facilities and equipment must be inspected daily. Damaged equipment must be immediately removed from use and repaired or replaced as soon as fiscally possible.

d. Competitive Sports

To ensure student and staff safety and security during on- and off-center events, centers are encouraged to prepare plans that contain the following elements, at minimum:

1. Consider limiting participants and spectators to current Job Corps students and staff.

2. Ensure that there is sufficient supervision for off-center games and events. The recommended ratio is one staff member for every five students.

3. Coordinate security arrangements between visiting and host centers in advance of each activity. Visiting centers shall provide a list of team members, Job Corps spectators, and player family members at least one week prior to the event. Limit entry into events to pre-approved spectators with proper identification.

4. Host centers are encouraged to arrange for additional security through local law enforcement when there is a history of past serious incidents.

5. Communicate safety and security procedures to athletes, staff, and spectators prior to the event.
Strategy:

- Does the center have a swimming pool?
- Is the CDC chlorine disinfection timetable for killing common germs part of the pool maintenance plan?
- Is the pool area properly secured to prohibit unauthorized access after hours?
- Are the proper warning signs, safety rules, and emergency response procedures posted?
- Is the necessary rescue equipment properly maintained and easily accessible?
- Observe recreational activities: Are students properly trained on weight room equipment?
- Are the recreational activities adequately supervised?
- Does the recreational and athletic equipment meet Consumer Product Safety Council minimum safety guidelines?
- Are gymnasium and/or indoor pool emergency exits easily accessible?
- Are students provided with the appropriate PPE for the sport or activity?
- Does the center have a plan to address student safety and security during on- and off-center competitive sports events?

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Rationale for Rating:

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R6. *Asbestos Operations and Maintenance Plan*
(See PAG Section 5.16, R5.)

R7. *Confined Space Entry Plan*

a. Overview

A confined space is one that is large enough and configured in a manner that would allow a person to enter the space to perform work. The space has limited or restricted means of entry or exit and is not designed for continuous human occupancy. Hazards may also exist in the space, such as combustible gases, toxic materials, or mechanical or electrical hazards, or the space may be oxygen deficient.

A Confined Space Entry Plan is not necessary if:
1. There are no confined spaces on center; or
2. Students and staff are prohibited from entering or performing work in any confined space.

b. Confined Space Inventory

1. Centers must conduct a survey to identify and label all confined spaces located on center. Each space must be identified as “non-permit required” or “permit required.”
   
   (a) A permit-required confined space is one that contains one or more of the following characteristics:
   
   (1) Contains or has the potential to contain a hazardous atmosphere
   
   (2) Contains a material that has the potential for engulfment or entrapment
   
   (3) Has an internal configuration such that an entrant could be trapped or asphyxiated
   
   (4) Contains any other serious safety hazard
   
   (b) Non-permit- required confined space does not contain or have the potential to contain a hazardous atmosphere or any other hazard capable of causing death or serious physical harm.
   
   (c) Re-evaluate all confined spaces annually and maintain documentation.
   
   (d) Permit-required confined spaces are marked as such with appropriate signage.
   
   (e) Ensure that permit-required confined spaces are locked or blocked to deter access (if possible).

2. Centers that require students, staff, or contractors to perform work in confined spaces are required to develop, implement, and maintain a Confined Space Entry program in accordance with 29 CFR 1910.146. The plan must consist of the following elements:

   (a) Designated Confined Space Entry Coordinator
   
   (b) Entrant and supervisor responsibilities
   
   (c) Non-permit-required confined space entry procedures
   
   (d) Location-specific, permit-required confined space entry procedures
   
   (e) List of center departments and/or career technical training trades that require confined space entry
   
   (f) Emergency procedures
   
   (g) Training and documentation of training
3. Maintain confined-space-entry training records for students and staff for three years. Additional retention requirements are as follows:
   (a) Retain student training records for one year following completion of training or termination of enrollment.
   (b) Retain staff training records for one year following resignation or termination of employment.

4. Maintain cancelled entry permits for one year.

Strategy:
- Does the center have a confined space inventory?
- Are the center’s confined spaces properly labeled?
- Does the center require staff and/or students to perform work in confined spaces?
- Does the center have a Confined Space Entry Plan that includes the following elements:
  (a) Designated Confined Space Entry Coordinator
  (b) Entrant and supervisor responsibilities
  (c) Non-permit-required confined space entry procedures
  (d) Location-specific, permit-required confined space entry procedures
  (e) List of center departments and/or career technical training trades that require confined space entry
  (f) Emergency procedures
  (g) Training and documentation of training
- Are training records for staff and students properly maintained?

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Rationale for Rating:

R8. **Bloodborne Pathogens Plan**

a. Centers must develop, implement, and maintain a Bloodborne Pathogens Control Plan that is in compliance with the OSHA Occupational Exposure to Bloodborne Pathogens; Needlestick and Other Sharp Injuries; Final Rule (29 CFR 1910.1030).
The plan, which is submitted to the Regional Office, must be reviewed and approved by the Regional Health Consultant. Once the plan has been approved, the plan should not be submitted again until at least one of the following occurs:

1. New or revised PRH or regulatory standards necessitate revision of the plan;
2. Center introduces a new trade resulting in new potential exposure to bloodborne pathogens; or
3. New engineering controls, including safer equipment or procedures, are introduced.

b. The plan must contain the following minimum requirements:
   1. Identification of job classifications where there is high, medium, or low risk of exposure to blood or other potentially infectious materials.
   2. Explanation of the protective measures in effect to prevent occupational exposure to blood or other potentially infectious materials and a schedule and methods of compliance to be implemented.
      a. Job classifications with high risk of exposure shall be provided the Hepatitis B vaccine.
      b. Job classifications with medium risk of exposure should be offered the vaccine or administered the vaccine as needed (i.e., post-exposure vaccine).

         Staff trained in CPR and first aid and required to render aid in an emergency as part of their job duties must be offered the Hepatitis B vaccine or administered the vaccine as stated above.
      c. Job classifications with low risk of exposure should be administered the vaccine as needed (i.e., post-exposure vaccine).

   Note: Regardless of job classification, individuals who decline the Hepatitis B vaccine must sign a declination form in accordance with 29 CFR 1910.1030 Appendix A.
   4. Schedule and method of implementation for communicating hazards to employees.
   5. Schedule and method of implementation for recordkeeping.

Strategy:

➢ Has the center developed a Bloodborne Pathogens Plan that contains the following elements?
   1. Identification of job classifications where there is high, medium, or low risk of exposure to blood or other potentially infectious materials.
2. Explanation of the protective measures in effect to prevent occupational exposure to blood or other potentially infectious materials, and a schedule and methods of compliance to be implemented.

   a. Job classifications with high risk of exposure shall be provided the Hepatitis B vaccine.
   b. Job classifications with medium risk of exposure should be offered the vaccine or administered the vaccine as needed (i.e., post-exposure vaccine).
      Staff trained in CPR and first aid and required to render aid in an emergency as part of their job duties must be offered the Hepatitis B vaccine or administered the vaccine as stated above.
   c. Job classifications with low risk of exposure should be administered the vaccine as needed (i.e., post-exposure vaccine).
      Note: Regardless of job classification, individuals who decline the Hepatitis B vaccine must sign a declination form in accordance with 29 CFR 1910.1030 Appendix A.

4. Schedule and method of implementation for communicating hazards to employees.

5. Schedule and method of implementation for recordkeeping.


- Does the center require CPR and first aid trained staff to render aid in an emergency?
- Are these staff members offered the Hepatitis B vaccine?
- Are they included in the center’s Bloodborne Pathogens Plan?

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Rationale for Rating:

**R9. Respiratory Protection Plan**

November 10, 2011
a. Centers must develop and implement a Respiratory Protection program, including a written plan in accordance with 29 CFR 1910.134, if any of the following conditions exist:
   1. Center offers trades that could potentially expose students or staff to airborne contaminants that meet or exceed the OSHA eight-hour Permissible Exposure Limits (PELs) or action levels for known respiratory hazards;
   2. Asbestos-containing building materials (ACBMs) are present and may be disturbed during routine maintenance, housekeeping, renovation, or demolition activities;
   3. Lead-based paint or other materials are present and may be disturbed during renovation and demolition activities; or
   4. Students and staff are exposed or may be potentially exposed to airborne contaminants and disease through contact with individual(s) engaged in providing student and staff health services or engaged in allied health training.

b. Centers are not required to implement a written Respiratory Protection program if filtering face piece respirators (i.e., dust masks) are used on a voluntary basis and there is no potential for airborne particulate levels to meet or exceed the OSHA eight-hour PEL or action levels.

Note: Voluntary use of tight-fitting, negative pressure air-purifying or powered air-purifying respirators requires a written plan, in accordance with 29 CFR 1910.134, Appendix D.

c. Centers must identify and evaluate respiratory hazards in the workplace through:
   1. Air sampling and exposure monitoring;
   2. NIOSH trade-specific data regarding airborne contaminants; or
   3. General or construction industry accepted best practices.

d. The Respiratory Protection Program must contain worksite-specific procedures and elements for required respirator use.

e. Center Director or his or her designee must select a Respiratory Protection Program Coordinator to manage the center’s Respiratory Protection Program.

f. The written Respiratory Protection Plan must contain the following elements:
   1. Respirator selection procedures and criteria that ensure that exposure to hazardous substances occurs at or below maximum use concentrations
   2. Medical surveillance for staff and students required to wear respirators
   3. Fit-testing procedures for tight-fitting respirators
   4. Procedures for the proper use of respirators in routine and emergency situations
5. Procedures and timelines for cleaning, disinfecting, storing, inspecting, repairing, discarding, and general maintenance of respirators

6. Procedures for ensuring air quality, quantity, and flow of breathing air for atmosphere-supplying respirators if applicable

7. Student and staff initial and annual refresher training that includes:
   (a) Potential respiratory hazards during routine or emergency situations
   (b) Proper use, donning, removal of respirators
   (c) Limitations of respirator use
   (d) Regular maintenance of respirators

8. Procedures for evaluating the effectiveness of the program

9. Medical evaluations conducted by a licensed health care professional in accordance with 29 CFR 1910.134(e)(1) through (e)(7)(iv)

10. Maintenance of respiratory protection training records for students and staff for three years. Additional retention requirements are as follows:
    (a) Retain student training records for one year following completion of training or termination of enrollment.
    (b) Retain staff training records for one year following resignation or termination of employment.

   g. Centers must establish a cartridge change-out schedule in accordance with OSHA and manufacturers’ recommendations to ensure cartridge effectiveness.

   h. Qualitative and quantitative fit-testing of tight-fitting respirators shall be done in accordance with 29 CFR 1910.134 Appendix A, Fit Testing Procedures (Mandatory). Fit-testing of respirators used to protect against asbestos or lead exposure shall be done in accordance with the appropriate OSHA standards.

Strategy:

➢ Does any one of the following conditions exist on center?

1. Center offers trades that could potentially expose students or staff to airborne contaminants that meet or exceed the OSHA eight-hour Permissible Exposure Limits (PELs) or action levels for known respiratory hazards.

2. Asbestos-containing building materials (ACBMs) are present and may be disturbed during routine maintenance, housekeeping, renovation, or demolition activities.

3. Lead-based paint or other materials are present and may be disturbed during renovation and demolition activities.

4. Students and staff are exposed or may be potentially exposed to airborne contaminants and disease through contact with individual(s) engaged in

November 10, 2011
providing student and staff health services or engaged in allied health training.

- Does the center have a Respiratory Protection Plan?
- Has the center developed a Respiratory Protection Plan that contains the following elements?
  1. Respirator selection procedures and criteria that ensure that exposure to hazardous substances occurs at or below maximum use concentrations
  2. Medical surveillance for staff and students required to wear respirators
  3. Fit-testing procedures for tight-fitting respirators
  4. Procedures for the proper use of respirators in routine and emergency situations
  5. Procedures and timelines for cleaning, disinfecting, storing, inspecting, repairing, discarding, and general maintenance of respirators
  6. Procedures for ensuring air quality, quantity, and flow of breathing air for atmosphere-supplying respirators if applicable
  7. Student and staff initial and annual refresher training that includes:
     (a) Potential respiratory hazards during routine or emergency situations
     (b) Proper use, donning, removal of respirators
     (c) Limitations of respirator use
     (d) Regular maintenance of respirators
  8. Procedures for evaluating the effectiveness of the program
  9. Medical evaluations conducted by a licensed health care professional in accordance with 29 CFR 1910.134(e)(1) through (e)(7)(iv)

- Are training records properly maintained?
- Are medical evaluations and exposure monitoring results properly maintained?

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Rationale for Rating:

November 10, 2011
R10. **Hearing Conservation Plan**

a. Centers must conduct noise monitoring at least every other year to identify potential sources of hazardous noise or whenever new noise sources are introduced into the working or training environment.

b. Centers must identify hazardous noise areas with warning signs or markings to ensure that hearing protection is used in those areas.

c. Centers must develop and implement a Hearing Conservation program in accordance with 29 CFR 1910.95 if the following conditions exist:
   1. Results of noise measurements have identified hazardous noise sources that may result in staff or student exposures that exceed 85dB (decibels).
   2. Exposure monitoring indicates that student and staff noise exposures equal or exceed an eight-hour time weighted average (TWA) of 85dB measured on the A-scale (slow response) or 50 percent (50%) dose.

d. The Hearing Conservation program (HCP) must consist of the following elements:
   1. Monitoring program that identifies students and/or staff for inclusion in the HCP and to facilitate selection of appropriate hearing protectors.
   2. Audiometric testing to monitor staff and students whose exposures equal or exceed an eight-hour TWA of 85dB, including:
      (a) Baseline audiogram to be administered within six months of the initial exposure equal to or in excess of 85dB to be compared against subsequent audiograms.
      (b) Audiograms administered at least annually following the baseline audiogram.
      (c) Audiogram evaluation.
      (d) Purchase of audiometric testing equipment is not required. However, if the center conducts audiometric testing, equipment and the testing environment must meet the requirements set forth in 29 CFR 1910.95, Appendices C and D.

If the center does not conduct audiometric testing, the center must ensure that individuals included in the Hearing Conservation program are administered audiograms in accordance with the OSHA standard.

(e) Audiometric testing must be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician certified by the Council of Accreditation in Occupational Hearing Conservation, or who has demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining, and checking calibration and proper function of the audiometers being used.
A technician who performs audiometric tests using a microprocessor audiometer does not need to be certified but must be responsible to an audiologist, otolaryngologist, or physician.

Centers located in rural areas that are not equipped to conduct audiometric testing on center or find it difficult to locate audiometric testing centers must contact the Job Corps Regional Office Project Manager who will contact the National Office of Job Corps Safety Representative.

3. Hearing protector evaluation for specific hazardous noise environments to ensure attenuation to below 85dB. Evaluation methods should be conducted in accordance with 29 CFR 1910.95 Appendix B, “Methods for Estimating the Adequacy of Hearing Protection Attenuation.”

4. Selection and distribution of hearing protectors.
   (a) Hearing protectors must be provided at no cost to staff or students.
   (b) The hearing protectors selected should be appropriate for the task and provide the required noise attenuation.
   (c) Students and staff who have not yet had a baseline audiogram should be issued hearing protection.
   (d) Students or staff who have experienced a standard threshold shift must be issued hearing protectors.

5. Training that will be administered annually that includes, but is not limited to, the following:
   (a) Effects of noise on hearing
   (b) Purpose of hearing protectors
   (c) Disadvantages, attenuation of various types of hearing protectors
   (d) Instructions on selection, fitting, use, and care of hearing protectors
   (e) Purpose of audiometric testing and an explanation of the test procedures

6. Staff and students, or their representatives, must have access to monitoring results, audiometric test results, and training materials in accordance with 29 CFR 1910.95.

7. Centers must maintain records as follows:
   (a) Exposure monitoring results are maintained for two years.
   (b) Audiometric testing results are maintained for the duration of the student’s enrollment and the duration of staff employment.
   (c) Student and staff hearing protection attenuation and selection, and training records are maintained for two years.
8. Centers must retain all records associated with the Hearing Conservation program, upon transfer of center operations to another operator.

Strategy:
- Has the center conducted noise monitoring in the last 24 months?
- Are warning signs or markings in place to identify hazardous noise areas?
- Interview Safety Officer. Are center staff and/or students exposed to noise levels that meet or exceed 85dB?
- Does the center have a Hearing Conservation program that includes the following elements:
  1. Monitoring program that identifies students and/or staff for inclusion in the HCP and to facilitate selection of appropriate hearing protectors.
  2. Audiometric testing to monitor staff and students whose exposures equal or exceed an eight-hour TWA of 85dB, including:
     (a) Baseline audiogram to be administered within six months of the initial exposure equal to or in excess of 85dB, to be compared against subsequent audiograms.
     (b) Audiograms administered at least annually following the baseline audiogram.
     (c) Audiogram evaluation.
     (d) Purchase of audiometric testing equipment is not required. However, if the center conducts audiometric testing, equipment and the testing environment must meet the requirements set forth in 29 CFR 1910.95, Appendices C and D. If the center does not conduct audiometric testing, the center must ensure that individuals included in the Hearing Conservation program are administered audiograms in accordance with the OSHA standard.
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     (f) Centers located in rural areas that are not equipped to conduct audiometric testing on center or find it difficult to locate audiometric testing centers must contact the Job Corps Regional
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   (b) Audiometric testing results are maintained for the duration of the student’s enrollment and the duration of staff employment.
   (c) Student and staff hearing protection attenuation and selection, and training records, are maintained for two years.

8. Centers must retain all records associated with the hearing conservation program, upon transfer of center operations to another operator.
R11. **Lead Exposure Plan**  
(See PAG Section 5.16, R4.)

R12. **Hexavalent Chromium Exposure Plan**  
(See PAG Section 5.16, R9.)

R13. **Lockout/Tagout Plan**

a. Centers must develop written procedures for the control of hazardous energy in accordance with 29 CFR 1910.147 if students and staff are responsible for servicing or performing maintenance of machines or equipment.

b. A Lockout/Tagout Plan is not required when:
   1. Servicing equipment that is powered by plugging into an electrical outlet and is under complete control of the individual performing the work; or
   2. Making normal adjustments, including minor tool changes and other minor servicing activities that take place during normal production operations which are routine, repetitive, and integral to the use of that production equipment, as long as workers are effectively protected by alternative measures that provide effective machine safeguarding protection.

b. When a written Lockout/Tagout Plan is required, the program must include the following minimum elements:
   1. Name of the machines or equipment and purpose of the procedure
   2. Compliance requirements (policy)
   3. Type of compliance enforcement for violation of policy
   4. Name of students or staff affected and method of communication
   5. Name of students or staff authorized to perform lockout/tagout

November 10, 2011
6. Type and magnitude of energy, its hazards, and the methods to control the energy
7. Type and location of machine or equipment operating controls
8. Type and location of energy isolating devices; lockout/tagout devices are sufficient in number, uniform, legible, understandable, and durable
9. Types of stored energy—methods to dissipate or restrain
10. Methods of verifying the isolation of the equipment
11. Training for affected and authorized students and staff
12. Method for evaluating lockout/tagout procedures at least annually and documenting results
13. Procedures for removing locks/tags when the owner of the lock or tag is not available
14. Plan is updated when changes in process, equipment, procedures, or audit warrants revision

Strategy:

- Are staff and students responsible for servicing or performing maintenance of machines or equipment?
- Is the serviced equipment or machine powered by plugging into an electrical outlet and is it under complete control of the individual performing the work? (If yes, a plan is not required.)
- Does the service include normal tool changes or adjustments that are part of normal production operations? (If yes, a plan is not required.)
- Does the center have a Lockout/Tagout Plan that includes the following elements:
  1. Name of the machines or equipment and purpose of the procedure
  2. Compliance requirements (policy)
  3. Type of compliance enforcement for violation of policy
  4. Name of students or staff affected and method of communication
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  6. Type and magnitude of energy, its hazards, and the methods to control the energy
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November 10, 2011
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Rationale for Rating:

**R14. Powered Industrial Vehicle Plan**

a. Centers that own or provide access to gas-powered or electric-powered fork trucks, tractors, platform lift trucks, motorized hand trucks (pallet jacks) or other specialized vehicles must develop a written Powered Industrial Vehicle Plan.

b. The plan must address the requirements outlined in 29 CFR 1910.178.

c. The plan must also include:
   1. Complete list of covered vehicles
   2. Fuel handling and storage procedures (if applicable)
   3. Battery charging, changing, and storage procedures (if applicable)
   4. Spill response procedures and fire prevention
   5. Areas where trucks are used
   6. Operator training
   7. Daily inspection process
   8. Process for removing vehicles from service

d. Powered industrial truck operators must be at least 18 years of age in accordance with the Fair Labor Standards Act.

e. Operator training must be conducted by a certified trainer and the training must be in accordance with 29 CFR 1910.178(l).
Strategy:

➢ Does the center own or provide staff and/or student access to gas-powered or electric-powered fork trucks, tractors, platform lift trucks, motorized hand trucks (pallet jacks), or other specialized vehicles?

➢ Does the plan include the following elements:
  
  1. Complete list of covered vehicles  
  2. Fuel handling and storage procedures (if applicable)  
  3. Battery charging, changing, and storage procedures (if applicable)  
  4. Spill response procedures and fire prevention  
  5. Areas where trucks are used  
  6. Operator training  
  7. Daily inspection process  
  8. Process for removing vehicles from service

➢ Are student operators at least 18 years of age?

➢ Is powered industrial truck training conducted by certified trainer?

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Rationale for Rating:

**QUALITY INDICATOR(S)**

Q1. Center management fully implements all required occupational safety and health plans and actively promotes and maintains a safe and healthy living and working environment on center for students and staff.

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Rationale for Rating:

November 10, 2011
PRH 5.20 Summary Rating:

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Sample Consolidated Rating Matrix

As noted in the PAG Preamble, Regional Offices have flexibility in weighting the scores of OA, Center, and CTS assessments based on a variety of factors. OA, Center, and CTS contracts all require assessment of the Management sections, but to varying extents.

Regional Directors and/or Division Chiefs should develop the matrix prior to the assessment so that the Review Team understands what areas need to be reviewed and how the ratings are to be established.

Below is a sample matrix for use on OA/CTS Assessments.

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The matrix above does not provide for any additional emphasis on specific PRH requirements or quality indicators. Regions have the flexibility to add specific requirements or quality indicators that they would like to emphasize as part of the assessment process.
Below is a sample matrix for use on Job Corps Center assessments.

### SAMPLE JOB CORPS CENTER CONTRACT MATRIX

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The sample center matrix gives each functional area similar weight. PRH 5.8 is not included as it is not intended for regional assessments. Regions may want to separate procurement and property functions, and consolidate facility and safety functions.
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<td><strong>Exceptional (8/9)</strong></td>
<td>Programs, procedures, and systems are well organized, clearly communicated, and administered to ensure quality delivery of all requirements and achievement of quality indicators. Innovative approaches result in program enhancements and improved outcomes. Through rigorous self-assessments and quality assurance, the operator safeguards program assets and maintains the integrity of program data.</td>
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<tr>
<td><strong>Very Good (6/7)</strong></td>
<td>Programs, procedures, and systems are consistently in place to ensure delivery of requirements and achievement of quality indicators. Some innovative approaches are employed to promote continuous improvement. A viable quality assurance plan ensures integrity and accountability of program assets and data.</td>
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<td><strong>Satisfactory (4/5)</strong></td>
<td>Requirements and quality indicators are generally evident in applicable program areas with minor exceptions. A quality assurance plan is in place that demonstrates adequate controls to ensure integrity and accountability of program assets and data.</td>
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<td><strong>Marginal (2/3)</strong></td>
<td>Requirements and/or quality indicators are missing or minimally evident in applicable program areas. Quality assurance is minimal resulting in inconsistencies in accountability and integrity of program assets and data.</td>
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<td><strong>Unsatisfactory (0/1)</strong></td>
<td>Critical requirements are missing or minimally evident. Quality indicators are not achieved. The program lacks procedures and controls necessary to ensure compliance, quality, and data integrity.</td>
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**Note:** A glossary of acronyms is located at the end of the PAG Preamble.
6.0 OBJECTIVES

To ensure that students receive the support services and benefits necessary for successful participation in the Job Corps program.

To establish uniform systems to account for and document the participation and achievement of program participants.
6.1 STUDENT ATTENDANCE, LEAVE, AND ABSENCES

PURPOSE

P1. To establish a uniform system to account for and document the whereabouts and participation of students during their Job Corps enrollment.

P2. To establish criteria and systems to grant leave to students during their Job Corps enrollment.

P3. To establish a uniform system to report and respond to unauthorized student absences.

REQUIREMENTS

R1. Student Attendance

Centers shall:

a. Establish and implement a system that tracks and documents the whereabouts of each student, to include the following elements:
   1. Conduct a morning attendance check no later than one hour after a student’s scheduled training day start time to establish present-for-duty status for all students. Documentation shall be authenticated by the signature of a staff member on the morning attendance check form.
   2. Maintain attendance records for all scheduled career development activities including on- and off-center academic and career technical training (CTT) classes, group activities, and off-center trips.
   3. Develop a procedure to document student arrivals and departures from the campus. Departure records shall indicate student destination, and estimated and actual time of return.
   4. Conduct, at a minimum, two bed checks each night for residential students.
   5. Develop a process for new enrollees, transfer students, nonresidential students, and students returning from off-center status, to sign in immediately upon their arrival on center.

b. Report each student’s duty status in the Center Information System (CIS) using the guidelines shown in Exhibit 6-1, Duty/Pay/Leave Status Chart, and the procedures stated in the CIS documentation.

c. Document each pay/leave status change and the reason for such change in CIS.

d. Maintain documentation of duty status for a minimum of three years.

e. Establish and implement a system to encourage and promote regular attendance, and identify and remediate chronic absences, missed appointments, and tardiness.

f. Monitor and document student attendance at off-center training activities, including work-based learning, off-center training (OCT), advanced career training (ACT), and other center-sponsored events.
Strategy:

- Review a sample of morning attendance-check reports to determine if the present-for-duty status is recorded for all students and reports contain staff signatures.

- Check the morning report from the residential area to ensure proper documentation of two nightly bed checks for residential students.

- Check the student sign-in process to ensure accurate, complete, and timely reporting for student arrivals and departures from the center. Determine if sign-ins are obtained for new arrivals, transfer students, nonresidential students, and students involved in off-center academic and CTT classes, group activities, and off-center trips.

- Review the standard operating procedure (SOP) pertaining to class attendance. Determine if the system addresses documentation of attendance, absence, and tardiness for on- and off-center classes, scheduled activities, WBL sites, and ACT. Determine if the process includes a system to address and remediate chronic absences, missed appointments, and tardiness.

- Review a sample of the attendance records to determine if all documentation is maintained for a minimum of three years. Ask the attendance clerk to explain the process of obtaining accurate and timely documentation from on- and off-center sites.

- Ask the Records Coordinator to demonstrate the system for recording information and verification documentation for pay/leave status changes in CIS and the filing system used to maintain hard-copy documentation, where necessary. Ask for an explanation of the storage and archive procedures for student leave and attendance records.

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Rationale for Rating:

**R2. Authorized Absences**

Centers shall:

a. Designate, in writing, staff members who are authorized to approve student leave and passes.

b. Grant breaks and leave to students based on the criteria shown in Exhibit 6-1.
Note: Leave shall not be granted as a means of artificially postponing the student’s separation.

c. Approve leave or overnight passes for minor students only with the written consent of the minor’s parent or legal guardian. Pass consents must include, at a minimum, information specified on the Job Corps Parental Consent Form (see the forms.jobcorps.org website).

d. Document all leave requested by students on a CIS leave request form. Each automated leave request form shall include justification, as appropriate, for the type of leave requested.

e. Authorize overnight passes with the following restrictions:
   1. Only for periods that do not conflict with scheduled classes, unless an accommodation for a class schedule adjustment is approved for a student with a disability.
   2. For minors, only to destinations authorized by written parental consent.

f. Report and maintain electronic copies of leave requests in CIS according to procedures shown in the CIS documentation and retain any supporting hard-copy verification documentation in the student’s personnel file. Verification obtained from phone calls will be documented on the CIS leave form and will include: name of contact person, title, phone number, date of contact, and name and address of the facility.

Strategy:

- Review a sample of leave requests in CIS.
  - For minors, check files for parental consent forms and authorized destinations.
  - Using Exhibit 6-1, review leave requests to determine if authorized criteria are met for each type of leave/pass granted.
  - Determine if verification from phone calls was properly documented in the CIS record.

- Using the sign-in/sign-out log, identify a sample of students who signed out for overnight passes. Review the CIS leave/pass records for those students to determine if the absence was authorized and properly documented.

- Review CIS and EIS reports to identify any students that are exceeding limits for AWOL days, PDOF, etc.

- Review the sign-in log to verify the student’s actual time of return. You may have to ask the team members who are reviewing residential and security to look at the logs.

- Ask the student Records Coordinator to explain the sign in/out process for leaves and overnight passes.

- Review the SOPs pertaining to signing in/out for leaves and passes.
R3. Unauthorized Absences

Centers shall:

a. Identify and report as AWOL any student who fails to return or report within three hours after the student’s scheduled training day start time. Report the AWOL within three hours of the student’s scheduled training day start time.

b. If a student who was identified and reported as AWOL contacts the center with a credible and verifiable explanation, the student’s status may be changed to the appropriate leave category, effective the date of contact and receipt of documentation to support the status change.

c. If a student who was identified and reported as AWOL returns to or reports to the center more than three hours after the student’s scheduled training day start time with no credible or verifiable explanation, the student remains in AWOL status for that day. The student may, however, participate in regularly scheduled activities for that day. Document in CIS case notes the student’s scheduled training day start time and actual report time, and include a printout of the Case Notes in the student’s personnel folder.

d. Develop and implement procedures to locate and contact the student. Document retrieval efforts in CIS Case Notes and include a printout of the Case Notes in the student’s personnel folder.

e. For minor students, contact the parents/guardian within 18 hours to inform them of the absence.

f. Assist the student in arranging return transportation, at the student’s request and expense.

g. Notify probation or parole officers, if applicable.
 Review a sample of sign-in logs to identify students who signed in more than three hours after the scheduled training day start time. For any students identified, check the student’s CIS file to determine if the student was reported as AWOL.

 In CIS, check a sample of records for students who show leave status changes. For those who were changed from AWOL status to another leave status, review the documentation to determine if the status change was appropriate. Determine if documentation supports the date of the status change.

 Review CIS Case Notes for students reported as AWOL to determine what AWOL retrieval efforts are documented. For minor students, check for documentation of parental notification.

 Review CIS for students with more than six consecutive training days in AWOL status. If the AWOL return date is the same as or one day after the leave return date, check the sign-in log to see if the student actually came back to the center, and check the Leave Request form in CIS to see if the reason for granting the leave was legitimate.

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Rationale for Rating:

QUALITY INDICATORS

Q1. Students can articulate the importance of regular attendance and understand the consequences of absences.

Strategy:

 Interview students. What happens when they have perfect attendance, poor attendance, or AWOL days? Who discusses attendance with them? Does anything happen to their pay when they are absent/AWOL? How is attendance linked to future employability? What happens when a student misses an appointment or social skills training? How many scheduled health/counseling appointments are missed?
Review the student handbook. Does it clearly describe the center attendance policy? Review the student behavior policy. Are sanctions for poor attendance clear? How is student attendance monitored when students participate in off-center activities?

Are instructors on time for classes? Do they model good attendance skills? How are instructors taking attendance?

Review attendance records. Are they complete? Do instructors take attendance every day? Do records indicate that interventions are used when students do not comply with the policy? Are interventions consistent with the center’s behavior management policies?

Review the methods used to manage unauthorized absences. Are students appropriately reported as AWOL? What procedures does the center use to contact AWOL students? Are attempts documented? Are parents contacted? Parole and probation officers?

Review CIS and EIS reports to identify any students who were exceeding the limits allowed for AWOL days, PDOF, etc.

Review counselors’ documentation of AWOL follow-up contacts and documentation via CIS Case Notes.

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Rationale for Rating:

Q2. Staff actions encourage, support, and enforce center attendance rules.

Strategy:

- Observe staff around the center. Do they emphasize accountability for time and attendance as a workplace skill? Do they ask students who are wandering to show a pass?

- Review classroom attendance policies and practices. Do the policies and practices reflect that of the workplace? How are the policies/practices reinforced?
➢ Review lunchtime protocol. Are there staff members in the cafeteria? Do they frequent the recreational areas, smoking areas, and learning resource areas to encourage prompt attendance for the next period?

➢ Interview students. What have their career technical instructors told them about workplace expectations for time and attendance? What about residential staff, counselors, and the center Standards Officer? What is the incentive system for attendance?

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Rationale for Rating:

Q3. The center’s responsibility to safeguard minor students is achieved through granting leaves and passes in accordance with the limitations established by their parents/guardians.

Strategy:

➢ Ask students to tell you how a minor gets permission to get a pass.

➢ Determine which minor students were on pass the previous weekend; review their CIS files to verify the pass information. Ask to see records/logs regarding passes granted to minors. Are parental consent forms readily available?

➢ Review leave requests in CIS. Are they timely and do they include the items listed in PRH Exhibit 6-1?

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6.2 STUDENT ALLOWANCES AND ALLOTMENTS

PURPOSE

P1. To provide students with an allowance to defray the cost of incidental personal expenses while enrolled.

P2. To establish a uniform system for issuing student allowances and transition payments earned through participation and achievement.

P3. To provide a means for Job Corps students to defray the costs of dependent care during enrollment.

REQUIREMENTS

R1. Allowances

Centers shall:

a. Issue pay allowances to students in accordance with the procedures specified in Exhibit 6-2.

b. Ensure the physical security and financial accountability of payroll funds pending disbursement to students.

c. Notify all students upon enrollment that they shall receive allowances as follows:
   1. Paid biweekly, in cash, for all days in paid status in amounts specified in Exhibit 6-2.
   2. For re-enrolled students, paid at base allowance levels as if they were newly enrolled (including students with prior fraudulent enrollments).
   3. For reinstated and re-established students, paid at their previous base allowance levels.
   4. Increases in base allowance levels paid as specified in Exhibit 6-2.
   5. Arrival pay in amounts as specified in Exhibit 6-2.

d. Advise students that arrival pay, basic living allowance, transition payment, and other benefits are taxable and subject to withholding.

e. Ensure that an income tax withholding form (W-4 form) is completed for each new enrollee as required by the tax code.

f. Ensure that wage and tax statements (W-2 forms) received by the center from the Job Corps Data Center (JCDC) are immediately distributed to all enrolled students or forwarded directly to separated students.

Strategy:

➢ Review procedures pertaining to student allowance, allotments, and transition pay. Review the Student Handbook for clarification of the student financial system. Discuss with the
Records Coordinator how the center’s policies/procedures concerning allowance and allotments are communicated to the students.

- Review a sample of the student personnel files to determine if each contains signed documentation acknowledging receipt of arrival pay, W-4, and a CIS hard copy that supports that the center has been responsible in the maintenance and submission of accurate pay records. Review the Student Handbook for clarification of the student financial system. Ask the center’s finance department to provide a copy of the last corporate student payroll audit.

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**Rationale for Rating:**

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**R2. Transition Payments**

- a. Outreach and Admissions (OA) contractors shall notify all applicants upon enrollment, and centers shall notify all students upon arrival that they may become eligible, at the time of graduation, to receive a transition payment as designated in Exhibit 6-2, to assist financially in the transition into the workforce.

- b. At the time of separation, students shall be notified that they must provide forwarding information to ensure proper delivery of the transition payments.

- c. Students shall be notified that failure to cash a received transition payment check or failure to report non-receipt of a check within 12 months of the date of separation will result in forfeiture of the payment.

- d. Students who re-enroll and subsequently graduate from the program are entitled to receive transition payment for those programs completed while enrolled in Job Corps according to the requirements stated in Exhibit 6-2 and are also entitled to the transportation benefits as shown in Exhibit 6-3.

- e. Centers shall disburse partial transition payments to graduated students at time of departure as shown in Exhibit 6-2.

- f. Students separated with reinstatement rights are entitled to receive their transition payments at the time of separation or may have these monies held in their accounts pending final separation.

**Strategy:**

- Review the center’s procedures pertaining to transition pay. Review a sample of student personnel files verifying that the appropriate amount was given at time of separation.
Confer with team member reviewing OA and Career Preparation Period (CPP) to determine that the information regarding transition pay has been satisfactorily explained. Confirm this through student interviews and focus groups.

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outstanding balance shall be collected automatically from any transition payment monies available at the time of separation.

d. Centers shall recover Other Student Indebtedness as specified below and in R3.c. above.

1. Reimbursement for lost or damaged government property, with total indebtedness against a student not to exceed $500. Student reimbursement for property loss or damage shall not exceed 50 percent per pay period as a deduction against student’s basic living allowance. Center operators shall apply such student reimbursements as offsets to be credited to the contract or interagency agreement and used to repair and replace damaged property or for other allowable costs. Any balance remaining due from the student at time of separation may be deducted from any transition payment due to the student. Thereafter, any remaining balance due shall be treated as uncollectible.

2. Center-imposed disciplinary fines may be collected from the student after the student receives his or her biweekly living allowance, not to exceed $5 per pay period. Such fines shall be paid to the Student Benefit Fund. Disciplinary fines may not be collected from any source other than a student’s biweekly living allowance.

Strategy:

- Check the Student Payroll Deduction list against the actual deduction. Finance should have its own record/journal to verify that the student received at least 50 percent of his or her net earnings after deductions, and that no deduction is more than $5.

- Ask the individual responsible for the distribution of student payroll to explain the collection process. Be sure they address center fines, restitutions, and deduction receipts.

- Review several personnel files of students who had payroll deductions to determine if there is documentation for all deductions. The documentation may be kept in finance.

- Survey/interview students to determine if they understand the pay system and transition pay eligibility.

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Rationale for Rating:
R4. Allotments

Centers shall initiate allotments for those students who desire to make a support payment for dependents in accordance with Exhibit 6-2 and the following criteria:

a. An allotment may be initiated by a student who has a child(ren) who draws substantial support from the student. The student must provide proof of dependency.

b. Allotment amounts shall be matched by the government at five times the amount of the allotment. Students may contribute $5 or $10 initially, and then increase the amount to $15, if they choose, after a minimum of 57 paid days in the Job Corps program.

c. Allotments shall be paid according to procedures specified in Exhibit 6-2.

d. Students shall be advised that the basic living allowance and transition payment will be reduced by the amount of their designated allotment(s).

Strategy:

➢ Check the appropriate personnel files for required documentation.

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Rationale for Rating:

QUALITY INDICATOR(S)

Q1. Students can explain the allowance system and the relationship of their achievements to the transition payment they may receive at separation.

Strategy:

➢ Review center procedures that provide information to students on the pay and leave policies. Interview students to see if they understand the policies. Review materials provided by the center during the Career Preparation Period. Do they explain the policies clearly?
Interview instructors and CTS staff. Ask for their explanation of the pay, leave, and transition pay policies. Is it correct? How do they provide information to students on the system, especially transition pay?

Interview students who are in the CPP, CDP, and CTS. Ask them to explain what they will be leaving with in terms of accomplishments and what transition services and pay they will receive when they leave the center. Did they receive information from their Admissions Counselor? Their instructors? CPP and CTS staff? Ask them what they are eligible for now and what they will be eligible for once they leave. Are they working toward graduate status partially as a result of the increased transition pay?

Contact a number of students who left the center at a variety of different time periods. Find out if they have received their payments and how the process is working out.

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Rationale for Rating:

Q2. Students understand what they must achieve to be eligible to receive a transition payment.

Strategy:

- Review center procedures that provide information to students on the pay and leave policies. Interview students to see if they understand the policies. Review materials provided by the center during the Career Preparation Period. Do they explain the policies clearly?

- Interview instructors and CTS staff. Ask for their explanation of the pay, leave, and transition pay policies. Is it correct?

- Interview students who are in CPP. Ask them to explain what they will be leaving with in terms of accomplishments and what transition services and pay they will receive when they leave the center. Did they receive information from their Admissions Counselor? Their instructors? CPP and CTS staff? Ask them what they are eligible for now and what they will be eligible for once they leave. Are they working toward graduate status partially as a result of the increased transition pay?
Contact a number of students who left the center at a variety of different time periods. Find out if they have received their payments and how the process is working out.

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Rationale for Rating:

Q3. Students are aware of the requirements to avoid forfeiture of a transition payment.

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6.3 STUDENT RECORDS MANAGEMENT

PURPOSE
P1. To ensure accurate documentation of the services provided, skills acquired, and benefits provided to students.
P2. To establish uniform systems for the maintenance and disposition of student records.
P3. To ensure that a student’s right to privacy is safeguarded.

REQUIREMENTS

R1. Records System
Centers shall develop and maintain a uniform records system to accurately document and regularly update the following types of information, services, and accomplishments for each student during enrollment as specified in the designated chapter:

| Administrative Records (enrollment data, allowances and allotments, leaves and absences) | Chapter 6 |
| Career Preparation and Development Records | Chapter 2 | Chapter 3 |
| Health History and Services | Chapter 6 |
| Personal and Social Development Records | Chapter 3 |
| Career Transition Information | Chapter 4 |

Strategy:

➢ Review several active student personnel files to determine if the required documentation and forms are present. Check to see if each personnel file contains a signed Consent for Release of Information.

➢ Review separated student personnel files to determine if files include TARs, verified HSE/HSD attainment, and placement verification.

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Rationale for Rating:
R2. **Student Personnel File**

Centers shall maintain for each student throughout enrollment a personnel file, which shall include the following documents:

a. Folder Inventory Form
b. Student Job Corps Data Sheet (ETA 6-52)\(^1\) and required enrollment forms
c. Record of Issue/Spent Clothing Allowance
d. Designation of Beneficiary (SF 1152)
e. Zero Tolerance for Violence and Drugs Certification
f. All hard-copy verification documentation supporting pay and leave status, including parental pass consent for minors. Leave requests shall be maintained electronically in CIS.
g. Informed Consent to Receive Mental Health and Wellness Treatment
h. Equal Opportunity Notice (Exhibit 6-11)

Strategy:

- Conduct audit of files to ensure that all required documentation is present in the student’s file.

---

\(^1\) Form generated through OASIS (Outreach and Admissions Student Input System). For forms requiring signature, a signed copy shall be maintained in the student personnel file.
R3. **Separation**

At the time of a student’s separation from Job Corps, centers shall combine all necessary records pertaining to that student into a single record and store it in a central location on center. Records of separated students shall contain documents as specified below:

1. All records indicated in R2 above
2. Final Student Profile (ETA 640)
3. Health Record
4. Accommodation Record
5. Copy of official high school equivalency (HSE) certificate or, if not applicable, passing scores, or high school diploma or high school equivalency credential earned while in Job Corps including final high school transcript(s) (if the student earned their diplomas from a center accredited as a degree-conferring high school). Supporting documentation will also include special education services, as applicable for students with documented disabilities.
6. Notice of separation from CIS. (No change)
7. TAR
   a. For students who complete their program while using a paper TAR, the completed original TAR is required for the students’ permanent file.
   b. For students assigned to an e-TAR, e-TARs will be stored electronically and will be available through the Center Information System (CIS/CIS3G).
   c. The full e-TAR will be permanently stored in the data warehouse. In...
addition, as a contingency measure, centers will keep a hard copy of the e-TAR summary page in the student permanent record file and credential attainment results (refer to Chapter 3, Section 3.2, R.6.b. and c.).

8. Tests of Adult Basic Education (TABE) – Answer Sheets (when the TABE is not administered online) or the Student Testing System (STS) Tickets. (No change)

9. Documentation supporting disciplinary separation. (No change)

b. Provide a copy of the student’s Job Corps consent for release of information as part of ETA Form 652 to the Career Transition contractor within five working days of separation. Information from confidential files shall not be released to Career Transition contractors.

c. Maintain the permanent student record on center for at least three years, at which time it will be retired to the Federal Records Center, as directed by the Regional Office.

Strategy:

➢ Review several separated student personnel files to determine if the required documentation and forms are present. Review the SOP pertaining to archiving student records. Have the Records Coordinator explain and show you the archive process.

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Rationale for Rating:

R4. Student Death

In the event of a student’s death, centers shall forward the entire record to the National Office of Job Corps within 10 days. The record shall include the sealed health record, death certificate, relevant counseling notes and records, and autopsy and chemical analysis report, if received.

Strategy:

➢ Review the procedures pertaining to student death.
Ask the Records Coordinator to explain the process.

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Rationale for Rating:

**R5. Confidentiality of Student Records**

Centers and Outreach and Admissions/Career Transition Services (OA/CTS) contractors shall safeguard and ensure the confidentiality of student personal information contained in records as well as verbal and written communications, in accordance with federal,
state, and local law, and as specified in Appendix 601 (Student Rights to Privacy and Disclosure of Information) and Appendix 607 (Transmission, Storage, and Confidentiality of Medical, Health, and Disability-Related Information).

Strategy:

➢ Review the SOP that pertains to confidentiality of student records to determine if all requirements are addressed. Ask the Records Coordinator to explain and show the system used for sharing personal information.

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Rationale for Rating:

R6. **Access to Student Records**

Centers and OA/CTS contractors shall provide students and parents/guardians of minors with access to their records on request. Access to medical records can be denied in accordance with the Notice (Exhibit 6-10) and Authorization (Chapter 1, Exhibit 1-3).

Strategy:

➢ Review the SOP pertaining to records accessibility. Ask the Records Coordinator to explain the policy.

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Rationale for Rating:
R7. Release of Information

Centers and OA/CTS providers shall respond to requests from former students or third parties for information concerning their enrollments upon receipt of a written, signed release of information, and in accordance with provisions of Appendix 601. This shall apply as long as the center has custody of the record.

Strategy:

- Review the SOP pertaining to the release of information. Ask the Records Coordinator to explain the policy. Review the Student Handbook and Career Preparation presentation to determine if disclosure of information and privacy are adequately addressed.

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Rationale for Rating:

R8. Freedom of Information Act Requirements

Centers and OA/CTS contractors shall respond to requests for disclosure of personal information about students in accordance with the Freedom of Information Act as specified in Appendix 601.

Strategy:

- Review the SOP pertaining to disclosure of information. Ask the Records Coordinator to explain the policy.

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Rationale for Rating:
R9. **Subpoenas for Student Records**

Centers and OA/CTS contractors shall forward all subpoenas to produce a student record or to testify regarding a student record to the Regional Office.

Strategy:

- Review the SOP pertaining to subpoenaing student records. Ask the Records Coordinator to explain the policy.

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**Rationale for Rating:**

**QUALITY INDICATORS**

Q1. **Students and staff understand and respect confidentiality of student information.**

Strategy:

- Observe and listen during meetings and informal conversations for discussions of individual student issues in the hallways, cafeteria, and other areas where they can be heard.

- Interview staff and students concerning confidentiality. What does staff do to protect the confidentiality of the students? What measures does the center take to protect the confidentiality of student information? Are student records adequately secured?

- Review procedures for releasing student information. Review files for subpoenas and requests from parents, employers, and other non-Job Corps individuals. Have the requests been processed as required?

- Review files for timeliness. How long does it take the center to respond to requests? Has it submitted subpoenas to the Regional Office for review in a timely manner?
Q2. Requests for information are responded to in a timely and professional manner.

Strategy:

➢ Ask the staff person who serves as the Disclosure Officer for the file containing requests for information.

➢ Review the request-for-information file. Are requests handled in a timely fashion? Is center-originated correspondence appropriate?

Q3. Student records accurately identify and document student progress and achievement.

Strategy:

➢ Use some of the student profiles pulled for review. Ask the teachers to pull student files and check to see if documentation of student progress is accurate and reflects student achievement. Does documentation in the record reflect individual progress as proposed in the student PCDPs?
➢ Determine if staff and resources are available to ensure reliable and accurate student data and record management.

➢ Interview staff. How do they share information about students in the students’ records? Is it done electronically?

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Rationale for Rating:
6.4 STUDENT ENROLLMENTS, TRANSFERS, AND SEPARATIONS

PURPOSE

P1. To establish a uniform system that enables centers to enroll new students and account for the transfer of students from one Job Corps center to another.

P2. To establish criteria for the transfer of students between centers.

P3. To establish a standard system that clearly defines the types of separation codes to be used for recordkeeping and data processing at the end of a student’s enrollment in the program.

REQUIREMENTS

R1. Enrollments

Centers shall:

a. Accept for enrollment all assigned new or transfer students who arrive at the designated arrival point or who report to the center. Students who depart for the assigned center on government-furnished transportation and do not reach the center are not considered arrivals.

b. Upon arrival, enroll the student by creating a student record in CIS in accordance with procedures in the CIS documentation. The enrollment date is the scheduled date of departure, provided that the student followed his or her travel itinerary. If the student intentionally changed the itinerary, the date of enrollment shall be the date of arrival on center.

Strategy:

➢ Compare the departure date on the student’s travel itinerary with the enrollment date.

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Rationale for Rating:
R2. Transfers

Centers shall:

a. By mutual agreement with another center and with notification of the Regional Office, arrange for the transfer of a student, including travel arrangements, if the student meets one or more of the following conditions:
   1. Is interested in and qualified for a training program not available at the current center.
   2. A change in environment or associations for the student will enhance the chances for graduation.
   3. Appeal of a disciplinary discharge is upheld and the Regional Director requests a transfer.
   4. Has medical needs that cannot be met at the current center and facilities and services are available at another center.

b. The transferring center remains accountable for the student until the day he or she arrives at the receiving center.

c. If student is receiving or has received medical services, including mental health, oral health, and TEAP, the transferring center will provide a legible or typed summary note on student’s current status, medication, and treatment compliance at least two weeks prior to student arrival. The student health record must arrive at the time of student arrival.

d. Original centers must provide student files to the receiving center in the case of readmitted students.

Strategy:

- Review the procedures pertaining to student transfers.
- Ask the Records Coordinator to explain the transfer process.

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Rationale for Rating:
**R3. Enrollment Extensions**

Center shall:

a. Grant extensions of up to one additional calendar year of enrollment (not to exceed three calendar years total) to students enrolled in designated advanced programs (Advanced Career Training [ACT] or Advanced Training [AT]).

b. Request Regional Office approval to extend a student’s two-year enrollment limit for up to six months for the student to qualify for graduation. Maintain documentation of approval in the student’s personnel folder.

**Strategy:**

➢ ACT/AT students should have written documentation (form letter) that notes the date and reason for the Center Director granting the extension; all others must have DOL approval.

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**Rationale for Rating:**

**R4. Separations**

a. Centers shall establish an orderly system to process students separating from the Job Corps program that includes at a minimum:

1. Update of all student accomplishments in CIS, including attainment of high school equivalency (HSE) and/or career technical completion.

2. Documentation of the reasons for the student’s separation approved by the Center Director or designee, with the documentation filed in the student’s personnel file.

3. Arrangements for transportation for the student to the appropriate destination.

4. Notification of the parents/guardians of minor students regarding the student’s separation status, date, and scheduled time of arrival home. Such notification must be documented.

5. A system to provide separating students with originals of any earned credentials, documentation of accomplishments, and contact information for Career Transition Specialists and support staff at the student’s destination.
6. Assignment of the student to a Career Transition Services provider in the locale to which the student will return.

7. Written notification to the student of name, location, and phone number of Career Transition Services providers.

8. Notification and transmission of student separation data to the Job Corps Data Center within two working days of the student’s separation, in accordance with procedures in the CIS documentation.

9. Verification and update of student address and alternate contacts.

b. Each student’s separation status and eligibility for Career Transition Services shall be determined automatically by CIS based upon data entered regarding the student’s accomplishments while enrolled, and in accordance with criteria shown in Chapter 4, Section 4.2, and Eligibility for Services.

c. Centers shall enter separation codes for students in accordance with the following definitions and separation codes listed in the CIS documentation:

1. Orderly Separation – Student has separated as scheduled and none of the following codes apply.

2. Maximum Benefits Separation – Formal determination has been reached through the student performance evaluation process and approved by the Regional Director that the student has achieved as much benefit from the Job Corps program as his or her abilities will allow. See Appendix 608 (Maximum Benefits Separation).

3. Resignation Separation – Student freely decides to quit Job Corps. Resignations must be accepted at any time a student requests unless he or she is pursuing it as a means of avoiding a disciplinary discharge. Students in AWOL status may not resign unless they return to center, or the student’s duty status is changed from AWOL to another leave status in accordance with criteria enumerated in Exhibit 6-1.

4. Disciplinary Separation – Student has committed a behavioral infraction or has an accumulation of behavioral infractions of such gravity that it disqualifies him or her from further enrollment in Job Corps.

5. Medical Separation – Student is no longer able to participate in Job Corps due to medical, dental, or mental health reasons; documentation of the student’s medical condition must be provided. If at the time of medical separation, the student is determined to be eligible for reinstatement once the medical condition is resolved, the student is then separated as a Medical Separation With Reinstatement rights (MSWR), and may be reinstated within 180 days.

6. Withdrawal of Parental Consent Separation – The legally responsible parent/guardian withdraws permission/consent for enrollment of a minor student. The center must verify and document that the requesting parent has legal responsibility for the student.
7. Death Separation – Student dies while enrolled in Job Corps.
8. Fraudulent Enrollment Separation – A determination has been reached, with the approval of the Regional Director or designee, that the student was ineligible for enrollment or that he or she became enrolled as the result of a significant screening error.
9. Absent Without Leave (AWOL) Separation – A student is in AWOL status in excess of six consecutive training days, or 12 non-consecutive training days in a six-month period. The effective date of separation is at three hours after the student’s scheduled training day start time on the seventh or 13th day of absence, as applicable. The summer and winter breaks are considered paid non-training days. For students in AWOL status at the onset of the break, the count of AWOL days will be suspended and will resume on the first training day following the break. 
   Note: If a student in AWOL status for six consecutive training days or 12 non-consecutive training days in a six-month period, reports on the seventh or 13th day (as applicable) within three hours of their scheduled training day start time, the student will not be separated as AWOL.
10. Administrative Separation With Reinstatement (ASWR) – For temporary or anticipated long-term center closure when designated by the Regional or National Office, and for students who are called to active military duty and must temporarily suspend their participation in Job Corps.
11. Withdraw HIPAA Consent – If the student or parent/legal guardian of a minor student revokes the HIPAA consent.

Strategy:

- Review the SOP pertaining to student separations. Compare the date on the CIS termination edit sheet to the actual separation date to determine if they are the same. Review the personnel files of separated students to determine if correct codes were used, adequate documentation to justify the separation is available, copies of all earned credentials and accomplishments were given to the student, and the CTS contractor was contacted. Review the student’s personnel file to determine if there is documentation that identifies the parent/guardian and that they have legal responsibility for the student.

- Compare the name, and if possible the signature, of the requesting parent to the name/signature on the ETA 6-52 and Parental Consent form.
R5. **Re-enrollments**

Centers shall effect reinstatements or re-establishments of students according to the following:

a. Reinstatement shall be used to expedite the return to active participation of a student who was separated for medical reasons with reinstatement rights (MSWR) or administrative separation with reinstatement rights (ASWR). Reinstatement is a resumption of the previous enrollment, not a new enrollment. Reinstatement is effective the date the student physically reports back to the center. To qualify for reinstatement under MSWR, the student must:
   1. Return within 180 days from separation date.
   2. Provide documentation showing resolution of the medical condition (including medical, mental health, oral health, alcohol, or drug abuse conditions) and ability to participate in the program.

To qualify for reinstatement under ASWR, the student must:
   1. Return within 12 months from separation date.
   2. Provide appropriate military documentation, if the separation reason was a call to active duty.

b. Re-establishment shall be used, with approval from the Regional Office, to return to active participation a student who:
   1. Received disciplinary discharges that are overturned by the Regional Office.
   2. Was separated due to arrest for a felony or misdemeanor charge and was later exonerated.
   3. Was separated because of clerical error.

Re-establishment is a resumption of the previous enrollment, not a new enrollment. Re-establishment is effective the date the student physically reports back to the center and must be documented in the student’s personnel file. For re-
established students who were separated because of clerical errors, the student will be retroactively placed on paid leave under the Not Present for Duty – Separation in Error leave type as indicated in Exhibit 6-1. For re-established students who were separated because of disciplinary charges or due to an arrest, the student will be retroactively placed in a Not Present for Duty – Disciplinary Overturn leave type, in either paid or unpaid status, as determined by the Regional Office.

Strategy:

- Review re-enrollment records to ensure proper procedures were followed.

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Rationale for Rating:

**QUALITY INDICATOR**

**Q1.** Student separation transactions are processed in a timely and accurate manner.

Strategy:

- Obtain a listing of students who are separating during the week. Get a copy of the center’s operating procedure for separation. Select a few students and follow the separation process to see if procedures, time frames, and data recordings are accurate and timely.

- Interview students who are completing and/or those who separated/completed within the past three months to determine if the center identified the students’ transitional needs and assisted in providing strategies to meet identified needs.

- Check the center’s operating procedures to determine what copies of documents students are to receive when they leave; ask each department how they provide the documents.

- Review the files of students separated as Maximum Benefits Separation. Do records indicate the student achieved the maximum level in training that Job Corps could provide in both career technical training and education? Did the center make every effort to support the student in completing their training?
Review transfer records. Were students transferred for appropriate reasons?

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Rationale for Rating:

PRH 6.4 - Summary Rating

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6.5 STUDENT CLOTHING

PURPOSE

P1. To ensure that students are adequately clothed to participate in the Job Corps program.

P2. To assist students in building a wardrobe that will be suitable for their chosen career fields.

REQUIREMENTS

R1. Student Clothing

Centers shall:

a. Issue, at no cost to the student, uniforms, specialized and safety equipment, and clothing necessary for a student to participate in career technical training. Such clothing and equipment shall meet safety and health requirements and industry standards so that the student is able to function comfortably and effectively in all weather conditions.

b. Issue, but retain as government property, such clothing and safety equipment that is determined to be serviceable and that can be sanitized.

c. Issue, for retention by the student, safety shoes and other items that cannot be sanitized.

Strategy:

➢ Review procedures. Do they comply with PRH requirements? Check student’s file to ensure the student is receiving adequate allotment.

➢ Determine the cost to students for CTT uniforms, and the percentage paid by the center. Compare this information to the SOP.

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Rationale for Rating:

R2. Cash Clothing Allowance

Centers shall establish a system to provide clothing allowances for students in the amounts indicated and according to the time schedule shown below:
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<th>Time Period</th>
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<td>Between 90 and 270 days</td>
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<td>Between 270 and 365 days</td>
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<td>TOTAL FOR YEAR 1</td>
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<td>Between 14 and 18 months</td>
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<td>TOTAL FOR YEAR 2</td>
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<td>Between 26 and 30 months</td>
<td>$103 additional</td>
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<td>TOTAL FOR YEAR 3</td>
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The first cash clothing allowance for students shall be used by centers, rather than provided directly to students, to purchase or supply to students the uniform(s) required for student participation in academic and career technical training. Subsequent cash clothing allowances for students, after the initial one, shall be given to the students in the form of cash or coupons for shopping off center for appropriate clothing.

a. Students transferred to advanced programs before the end of the first year of enrollment shall receive the balance of the first year cash clothing allowance prior to transfer. Students transferred after the start of the second year of enrollment shall receive the balance of the second year cash clothing allowance prior to transfer.

b. For students reinstated less than one year after the prior separation, the amount of clothing allowance previously provided shall be subtracted from the maximum allowance authorized during the current enrollment. Students reinstated after one year shall be considered new enrollees for clothing allowance purposes.

### Strategy:

- Review procedures pertaining to the issuing of cash clothing allowances. Review the CIS for documentation of cash clothing allowances.

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July 28, 2014
**R3. Emergency Clothing**

Centers shall provide for emergency clothing needs and deduct the amount provided from the student’s clothing allowance.

Strategy:

- Review the SOP pertaining to student clothing allowance. Ask the student Records Coordinator to explain the policy. Review the Student Handbook and other materials pertaining to the purchasing of clothing.

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Rationale for Rating:

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**R4. Dress Code/Clothing Selection**

Centers shall develop a Student Dress Code that reflects center policy regarding appropriate dress as well as the Job Corps Student Dress Standards. Outreach and Admissions staff must include each center’s specific dress code and use of uniforms as part of their presentation to applicants on Job Corps policies and requirements. The dress code should be published in each center’s Student Handbook and include the following minimum expectations for general student, academic classroom, career technical classroom, and off-center dress:

a. **General Student Dress Standards**

1. Pants must be appropriate in size and worn at the waist at all times.
2. Clothing depicting violent or nude scenes, and clothing bearing profanity, references to drugs and alcohol, or otherwise provocative or inappropriate slogans, will not be permitted at any time.

b. **Academic Classroom Dress Standards**

1. To allow students the opportunity to use the clothing in real work situations, the academic uniform should be without a center logo, a Job Corps logo, or any type of printing.
2. Shoes are to be neat, clean, laced and tied, and free of graffiti or markings.
c. Career Technical Skills Classroom Dress Standards

1. If career technical skills uniforms are issued, they should always be worn during career technical class hours.

2. Uniforms will be neat and clean, without tears or holes, and free from markings.

3. Pants will be belted, properly fastened, and worn at the waist.

4. Clothing must be appropriate in size and worn at the proper body position. No undergarments of any kind may be visible.

5. Shoes will be issued with regard to safety issues. Where safety shoes are not required, the choice of shoes will be a standard that would appear in the workplace for that particular vocation. All footwear will be clean, polished, tied, and free of graffiti or markings.

6. For business vocations (e.g., business clerical, accounting technician, medical records assistant, computer repair, retail sales), either the academic outfit or career technical uniform (if issued) may be worn. Acceptable vocational (business) attire includes: business dresses (knee length), dress pants (worn at the waist), business shirts, pant suits, or skirts (knee length). Shoes are to be clean, polished and tied, and free of graffiti or markings.

d. Off-Center Activities Dress Standards

1. Students are expected to represent themselves as models and representatives of the center, the Job Corps program, and the Department of Labor. All elements of the dress standards will apply (see those described in R4.a–c above).

Centers shall provide guidance to students regarding appropriate types of clothing for the workplace in their chosen fields, and centers shall ensure that purchases made by students with their cash clothing allowance are for interview- and work-appropriate clothing.

Strategy:

- Review the Student Handbook description of the dress code to determine if it complies with PRH standards. Observe student attire. Do standards appear to be uniformly enforced? Does staff provide guidance to students? How?
R5. **Documentation**

Centers shall maintain records and receipts in each student’s personnel file for each clothing purchase. Such records shall include a signed receipt for all clothing allowances issued to the student. Form ETA 6-105 may be used for this purpose. The purchased amount shall be entered into the student’s record in CIS.

**Strategy:**

- Determine if there are ETA 6-105s (or like documents) signed by the student, along with the appropriate sales receipts available in the student personnel folder for each clothing issue.

- Determine if there is a CIS hard copy that supports that the center has been responsible in the maintenance and submission of accurate clothing allowance records.

---

R6. **Inventory**

Centers shall:

a. Conduct and record an inventory of clothing and other personal effects when a student enters the residential program, and update the inventory after each clothing issue or purchase.
b. Inventory and secure a student’s clothing and personal effects when the student is absent from the center without permission for more than 24 hours.

Strategy:

➢ Review the student personnel file to determine if initial clothing inventory forms are present.

➢ Ask residential staff to explain the policy for inventory of personal effects. Does the residential staff update the inventory after each clothing issue or purchase?

➢ Ask residential staff to explain the policy for securing personal effects. Who is responsible for securing these items? When are the items secured?

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Rationale for Rating:

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**R7. Welcome Kit**

Upon arrival, centers shall provide each residential student with the following personal items at no cost to the student:

a. Towels and wash cloths

b. Laundry bag

c. Toiletries

Strategy:

➢ Review welcome kit contents provided by the center. Review the Business Management Plan (BMP) for the proposed kit.
QUALITY INDICATORS

Q1. Students are able to describe appropriate attire for their career fields.

Strategy:

➢ Interview students. Ask about attire for their trade and what they will be expected to wear when they begin work. Can the students tell you where to get the clothing and how much it costs?

Q2. Student clothing purchases are appropriate for career and leisure time needs.

Strategy:

➢ Interview students. Are they purchasing the appropriate clothing now that emulates workplace standards? Ask to see the clothing they have already purchased for their career.

➢ Review residential folders for additions of new clothing to the student’s personal belongings inventory.
Q3. Center recordkeeping systems appropriately account for disbursement, receipt, and proper expenditure of clothing allowance funds.

Strategy:

- Review the process for maintaining clothing inventories. Does it match the operating procedure related to clothing purchase and inventory?
- Review the procedure for giving students funds to complete clothing purchases.
- Are students responsible for those funds? How does the center account for the funds?
- Look at the ETA 2110 for this line item and check for accuracy with regard to on-board strength, etc.

Q4. Student clothing inventories accurately reflect student belongings.

Strategy:

- Check several students’ inventory against their belongings. Do they match? Is the inventory current?
Evaluate reported thefts of personal belongings that were submitted as student claims to the Regional Office.

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6.6 STUDENT TRANSPORTATION

PURPOSE

P1. To establish a system to provide students with economical and expedient transportation while enrolled in the program.

REQUIREMENTS

R1. Government-Furnished Transportation

Centers shall provide Job Corps students with government-furnished transportation in accordance with procedures issued by the Regional Office, under the conditions and circumstances shown on Exhibit 6-3 (Student Transportation).

Strategy:

- Use the active and terminated student audit sheets and/or the Accountability History Roster to identify furnished transportation; review the appropriate personnel files for copies of signed ETA 6-105s, initial Travel Itinerary/Authorization, Leave Request forms, signed receipt/form for any meal allowance given, and CIS hard copies for each transportation allocation.

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Rationale for Rating:

R2. Travel Costs

Centers shall develop a system to provide economical transportation to students while enrolled that includes the following features:

a. Use of federal credit cards or other means as prescribed by the Regional Office to assure students arrive at their scheduled destinations using the safest, most economical mode of travel.

b. Provide the student with $5.00 for each meal period that is missed due to travel.

Strategy:
Review procedures pertaining to student transportation. Ask the student Records Coordinator to explain transportation and meal allowance procedures. Review appropriate personnel folders of students who received a meal allowance for signed document acknowledging the receipt of meal money.

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Rationale for Rating:

**R3. Unused Ticket Recovery**

Centers shall develop a system to promptly identify and report any unused, lost, or stolen travel tickets in accordance with Regional Office direction. Such tickets shall be returned to the issuing agency for credit to the government-travel account. When tickets are not returned or used, the center shall document the amount of the ticket that is to be deducted from the student’s allowance.

Strategy:

- Ask the student Records Coordinator to explain the recovery process.
- Review the student’s personnel file for a hard copy of a CIS screen that supports the deduction was accurately and timely entered.
- Review the Unused/Lost Ticket Log to verify appropriate tickets are recorded and the government account is being credited.

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Rationale for Rating:
R4.  **Local Transportation**

Centers shall:

a. Provide transportation to and from the center daily for nonresidential students.

b. Provide transportation to and from the center’s designated arrival point for students using government-paid transportation.

c. Provide transportation for students to and from off-center training, work-based learning, and off-center activities.

Strategy:

➢ Collaborate with the team members who are reviewing WBL and center vehicles to determine if adequate transportation is furnished.

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Rationale for Rating:

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R5.  **Staff Travel**

Centers shall ensure that staff travel expenses for escorts and other purposes are paid from center operating funds.

R6.  **Transportation for Dependent Children**

Centers shall provide government-paid transportation to and from home to children who participate in Job Corps Residential Parent/Child programs. Such transportation shall be authorized to the same extent as it is allowed for their parents.

R7.  **Student Vehicles**

Centers shall not permit residential students to keep personal vehicles at Job Corps centers.

**QUALITY INDICATORS**

Q1. Unused student travel tickets are recovered and credited to the government account.
Strategy:

- Review student transportation ticket records. Is there documentation that unused, lost, or stolen tickets are reported as required by the Regional Office?

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Rationale for Rating:

Q2. Travel arrangements do not require students to travel in unsafe situations.

Strategy:

- Review the travel scheduled during the week. Look at the itinerary for students.

- How late are they arriving? How many connections are necessary? Are there long periods of time between connections?

- Interview students about their travel experiences.

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6.7 FOOD SERVICE

PURPOSE

P1. To ensure that students receive well-balanced, nutritious meals that enable them to remain healthy throughout their participation in the program.

REQUIREMENTS

R1. Food and Nutrition

Centers shall provide food services to students, to include:

a. Meal service
   1. Provide three meals per day, except on holidays and weekends, when two meals are acceptable. In lieu of the third meal, healthy snacks shall be available to students on weekends and holidays.
   2. No more than 14 hours shall elapse between meal services.
   3. Meals shall be planned using a minimum of a 28-day cycle cafeteria menu.
   4. Meal service shall be consistent with schedules for work-based learning, off-center activities, late arrivals, etc.

b. Food options
   1. Students shall receive a minimum of two choices of meat or non-meat protein sources at both lunch and supper.
   2. Students shall receive a minimum of the following daily:
      (a) Five choices of fresh or frozen vegetables and/or fruits.
      (b) Four servings of grain products.
      (c) Low-fat and/or fat-free milk and dairy alternatives and water shall be available at all meals.
   3. Centers shall offer meals and food items that meet the dietary needs and desires of a diverse population, including ethnic, vegetarian, and low-fat alternatives.

b. Nutrition
   1. Meals shall reflect the definition of a “Healthy Diet” as described in The Dietary Guidelines for Americans. Meals shall:
      (a) Emphasize fruits, vegetables, whole grains, fat-free or low-fat milk and milk products, and dairy alternatives.
      (b) Include lean meats, poultry, fish, beans, eggs, and nuts.
(c) Be low in saturated fats, trans fats, cholesterol, salt (sodium), and added sugars.

2. Portion sizes shall reflect recommendations set forth in the Dietary Guidelines for Americans.

3. Foods of Minimal Nutritional Value (FMNV) as defined in Appendix B of 7 CFR Part 210 may be available to students in the cafeteria on a limited basis. Students may be given the option to purchase FMNV through vending machines, or student store.

Strategy:

- Visit cafeteria during a meal time, review menus, and check hours of operations.
- Interview food service staff to determine how food offerings reflect the Dietary Guidelines for Americans and required food options.

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Rationale for Rating:

**R2. Dining Environment**

Centers shall:

a. Operate a dining room and serving and meal preparation areas that are clean, attractive, and comply with state or local (whichever is stricter) food handling and sanitation standards for the food service industry.

b. Post the most recent environmental health inspection report at the serving line entrance.

Strategy:

- Conduct a walk-through of the cafeteria, checking for cleanliness and looking for postings of environmental health inspections.
R3.  Food Service Staff Health

Centers shall ensure that kitchen and dining hall staff comply with state or local food handling requirements, per PRH Chapter 5, Section 5.13, R4.

Strategy:

➢ How is staff trained? Are they certified food handlers?

R4.  Food Service Management and Control

Centers shall develop procedures for ordering, purchasing, receiving, storing, inventorying, and issuing food products that ensure:

a.  Prevention of fraud and abuse.

b.  Protection of food and food preparation equipment and areas from contaminants, insects, and rodents.

c.  Safe and sanitary handling and storage of food.

Strategy:

➢ Review SOPs for this area. Inspect food storage areas. What are pest control procedures?
R5. **Student Input**

Centers shall develop procedures to obtain student input into the planning and evaluation of the content and quality of the meals and service provided.

**Strategy:**

- Interview staff, students, and food service staff to determine how student input is sought, obtained, and acted upon.

---

R6. **Staff/Visitor Meals**

Centers shall provide staff and visitors access to meal service during regularly scheduled serving periods. All non-students shall be charged (unless prior Regional Office approval is granted) a price that covers cost of food and its preparation.

**Strategy:**

- How does staff pay for meals? Who monitors meal ticket usage? How is system monitored?
QUALITY INDICATORS

Q1. The dining hall is clean and well maintained and provides a pleasant dining atmosphere.

Strategy:

- Observe staff and student behavior in the dining hall. Is the menu readable? Does it include the entire week? Is the food served the same as that advertised on the menu? Is the staff cleaning during meals? Do students pick up after themselves? Are students treated as adults and customers? Would you want local community members eating with staff and students?
- Interview kitchen staff. How does kitchen staff view their role in the center Career Development Services System (CDSS) plan?
- Eat a meal in the cafeteria. Are the quality and cleanliness of the silverware, plates, and glasses appropriate? Are adult monitors responsible for ensuring student behavior is acceptable? Are a variety of foods available? Are they of good quality? Is there adequate seating room and serving areas to accommodate students?

Q2. Students have input into meal planning.

Strategy:
➢ Ask to see the minutes of the food service meetings in which students have participated. Have any surveys been taken recently? How are food service meetings conducted? Does documentation provide evidence that students have given suggestions and that they have been taken? How are decisions made regarding meal changes? Who follows up on student suggestions and complaints?

➢ Interview students. How have they been involved in meal planning? Are suggestions received? Does center staff follow up on suggestions?

➢ Review menus. Are some meals reflective of diversity (e.g., include foods native to other countries and cultures)?

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Rationale for Rating:

Q3. Students are satisfied with the center food service.

Strategies:

➢ Observe the kitchen during meal time. Do students appear to like the food? Do they choose a range of entrees or does everyone eat the same thing?

➢ Interview students. Solicit their views about the quality of food service.

➢ Review minutes of food committee meetings. Are committee recommendations accepted and acted on by center management?

➢ Ask students if they feel they get enough food? Is the center providing appropriate and adequate snacks on weekends and holidays?

➢ Review the student survey for questions pertaining to this area. Determine if follow-up activities have been undertaken to address any issues with poor student survey responses.
### PRH 6.7 - Summary Rating

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6.8 STUDENT CIVIL RIGHTS, INCLUDING RELIGIOUS RIGHTS, AND LEGAL SERVICES

PURPOSE

P1. To ensure the protection of students’ civil rights, including religious rights, and promote an environment free from discrimination and harassment.

P2. To provide students with access to legal assistance.

P3. To provide students with the opportunity to exercise their religious rights.

REQUIREMENTS

R1. Student Rights

a. Centers and Outreach and Admissions/Career Transition Services (OA/CTS) contractors shall inform all applicants and students of their rights and protections regarding civil rights, including disability accommodations (see R2 below), sexual harassment (see R3 below), religious rights (see R4 below), and nondiscrimination (see Appendix 602). At a minimum, centers and contractors must provide applicants and students with the Equal Opportunity Notice set forth in 29 CFR 37.30 (see Exhibit 6-11). The Notice must be included in each student’s file, and provided in alternate formats upon request to applicants and students with visual impairments. Where an alternate-format Notice has been provided, a record that such a Notice has been given must also be made a part of the student’s file.

b. Staff Training

Job Corps centers must ensure that all Job Corps center staff are fully apprised of, and annually trained in, requirements regarding civil rights, including religious rights. See Chapter 5, Exhibit 5.4.

Strategy:

➢ Is there an Equal Employment Opportunity (EEO) program for students? Interview students to determine if they are aware of the program.

➢ Identify the student EEO Coordinator on center.

➢ Determine if students have received training on the EEO program and are aware of the EEO Coordinator’s identity.
R2. Disability Accommodations

a. Accommodations for Applicants and Students With Disabilities

All applicants and students with disabilities must be provided the opportunity to request and receive reasonable accommodation in accordance with Section 188 of the Workforce Investment Act of 1998, Section 504 of the Rehabilitation Act of 1973, and their implementing regulations. Guidelines for providing reasonable accommodation are outlined in Appendix 605 and on the Job Corps Disability website.

b. Definition of Disability

For accommodation purposes, a disability is defined as a physical or mental impairment that substantially limits one or more of a person’s major life activities.2 Appendix 605 contains information explaining this definition, and related requirements, in detail. Whether a particular person has an impairment that satisfies this definition, and whether a specific accommodation is appropriate for a particular person, must be determined on a case-by-case basis by someone with appropriate expertise in the field.

Strategy:

➢ Interview staff to determine if they are aware of responsibilities to provide accommodations.

---

2 Applicants and students who have a record of a disability, or who are regarded as having a disability, are protected from discrimination by federal disability nondiscrimination laws. However, the laws do not entitle these people to the positive actions, such as reasonable accommodations, that must be provided to applicants and students with actual, current disabilities.
R3.  **Bullying and Sexual Harassment Training**

Centers shall provide students regular proactive education on bullying, sexual harassment, appropriate behavior, appropriate staff/student boundaries, and consequences.

Strategy:

➢ Interview staff to determine how often students receive training on sexual harassment.
   Review copy of curriculum and documentation that training has been conducted.

R4.  **Religious Activities / Treatment of Religious Organizations**

Job Corps places a high value on the right of students in Job Corps to exercise their religious freedom. As detailed in R4.a-h, below, Job Corps centers are required to allow students to engage in religious activities on center.

In implementing this requirement, Job Corps centers must not discriminate among students on the basis of religion, religious belief, or lack thereof. Therefore, Job Corps centers must remain neutral in their treatment of various religions; must not require or, based on religion, prohibit participation by any student in religious activities; and must
neither encourage students in, nor discourage students from, belief in religion generally, or in any particular religion.

a. Respect for Religious Rights

Job Corps centers must ensure that each student has the right to worship, or not worship, as he or she chooses.

b. Religious Activities Permitted on Center

1. Job Corps centers must permit students to express their views related to religion and to exercise their right to religious freedom. Job Corps centers must permit residents to engage in voluntary religious activities, including holding religious services on center. Reasonable time, place, and manner restrictions may be imposed, however.

2. Job Corps centers must inform students about their rights to engage in religious activities on center. To the extent applicable, centers must also develop, and inform students about, procedures for scheduling (and monitoring, where appropriate) religious activities to ensure equitable allocation of space and other center resources. In preparing the calendar of recreational events and activities required by Chapter 3, Section 3.21 (Recreational and Leisure Time Activities), R1.a, centers must include those on-center religious services that are open to all students and/or supervised by Job Corps staff.

c. Religious Accommodations

1. Centers must develop, and inform students how to access, procedures for requesting religious accommodations (for example, special diet or exemption from center activities or rules for religious reasons).

2. If a center denies a request for a religious accommodation, the center must:

   (a) Explain to the student the reason for the denial, and any appeal rights and procedures; and

   (b) Create and keep a record describing the request, indicating that the request was denied, and explaining the reason for the denial.

d. Transportation to Local Religious Facilities

Job Corps centers may provide students with transportation to and from local religious facilities. The decision whether to provide transportation to a particular facility must not be based on religion. However, Job Corps centers may impose reasonable time, place, and manner restrictions. For example, a Job Corps center may decide that it will provide transportation only to facilities that are located within a particular distance from the center. If Job Corps centers choose to provide transportation to religious facilities, these centers must develop, and inform students about, procedures for requesting such transportation. Note: Providing such transportation does not relieve Job Corps centers of the obligation
in R4.b above to permit students to engage in voluntary religious activities on center.

e. No Discrimination on the Basis of Religion

In providing Job Corps services, Job Corps centers must not discriminate against or favor a current or prospective student on the basis of religion or religious belief or lack thereof. This requirement does not preclude Job Corps centers from accommodating religion or religious belief (e.g., permitting exemptions from certain Job Corps center rules for students based on religious reasons) nor does it require Job Corps centers to give similar treatment or exemptions to students who desire “accommodations” for reasons unrelated to religion or disability (see R2 above for information about accommodating students with disabilities). Job Corps centers are permitted to supervise on-center religious activities as appropriate to maintain good order and discipline, so long as Job Corps centers do not rely upon the religious (or non-religious) nature of an activity, or student gathering, in choosing which activities or gatherings to supervise.

f. Prohibited Activities

The following activities are always prohibited on center, regardless of any religious motivation.

1. Acts of violence
2. Animal sacrifice
3. Performance of curses, hexes, or other rituals or actions intended to harm others
4. Public nudity
5. Acts of self-mutilation or infliction of bodily harm
6. Use or display of weapons
7. Exclusion by race, ethnicity, color, or national origin
8. Sexual acts
9. Use, possession, or sale of controlled substances as defined under the Controlled Substances Act; being under the influence of, using, or possessing any narcotic drugs, hallucinogens, marijuana, barbiturates, or amphetamines; operating a motor vehicle while under the influence of alcoholic beverages; and being under the influence of or using alcoholic beverages
10. Possession of unauthorized goods, as defined in the Job Corps regulations at 20 CFR 670.120, which include:
   (a) Firearms and ammunition
   (b) Explosives and incendiaries
   (c) Knives with blades longer than two inches
   (d) Homemade weapons
(e) All other weapons and instruments used primarily to inflict personal injury

(f) Stolen property

(g) Drugs, including alcohol, marijuana, depressants, stimulants, hallucinogens, tranquilizers, and drug paraphernalia except for drugs and/or paraphernalia that are prescribed for medical reasons

(h) Any other goods prohibited by a center operator in a Student Handbook

11. Coercion or harassment of anyone based on religion or lack thereof

g. When Federal Support May Be Used to Support Inherently Religious Activity

Except as described in this PRH, Job Corps centers must not use direct federal support for inherently religious activities such as worship, religious instruction, or proselytization.

At Job Corps facilities where there is such a degree of government control over the program environment that religious exercise would be significantly burdened absent affirmative steps by Job Corps operators (such as at isolated Job Corps facilities), program officials may take affirmative steps to ensure that program beneficiaries are able to exercise their religious freedom, including the use of direct federal support to provide access to religious services and activities where necessary to ensure the opportunity for exercise of religious rights. Indirect federal support – e.g., support received due to the exercise of genuine and independent choice by a Job Corps student – is not subject to these restrictions on providing Department of Labor (DOL) support to inherently religious activities.

**Note:** Center supervision of students engaged in religious activities and gatherings, to the extent such supervision occurs in a manner consistent with center supervision of students engaged in nonreligious activities and gatherings, does not constitute federal “support” for religious activities.

h. Religious Organizations Must Be Treated on a Basis Equal to That of Other Organizations

Religious organizations are eligible on the same basis as any other organization to participate in Job Corps programs or activities. Job Corps centers must not discriminate against or favor an organization on the basis of the organization’s religious character or affiliation or lack thereof. Religious organizations that participate in Job Corps programs must be permitted to maintain their religious identity. Religious organizations are permitted to use their facilities to provide services to Job Corps without removing or altering religious art, icons, scriptures, or other religious symbols from those facilities.
R5. 

**Applicant/Student Complaints**

Job Corps centers must develop and implement systems to respond to complaints of discriminatory treatment of students or applicants, or violation of civil or religious rights, which includes the following features:

a. A designated, trained Equal Opportunity Officer who will:
   
1. Assist students and applicants in filing complaints with the center or with the DOL Civil Rights Center (CRC).
2. Attempt to informally resolve complaints filed with the Job Corps center.
3. Document all complaints filed with the Job Corps center (including keeping a complaint log) and all actions taken in connection with complaints.
4. Provide center-wide training and publicity.
5. Ensure that student complainants are not subjected to retaliation or other adverse treatment.
6. Provide written notice of students’ right to file complaints, and written guidance to assist students in filing complaints.
7. Advise students of appeal rights and procedures.
8. Serve as the center’s liaison with CRC.
9. Monitor and investigate the Job Corps center’s activities to make sure the center is complying with its nondiscrimination and equal opportunity obligations.
10. Report directly to the appropriate official about equal opportunity matters.
11. Undergo training to maintain competency.

b. Complaint resolution procedures as specified in Appendix 602 (Civil Rights and Nondiscrimination).
R6.  Access to Legal Services

Job Corps centers must provide students with information about the availability of legal assistance within the community at no cost to Job Corps, for those charged with a felony or misdemeanor.

Strategy:

➢ Is there information on legal services in the student handbook? Is it posted? Do counselors/EEO Officer know about it?

R7.  Student Legal Obligations

Job Corps centers must assist students in resolving minor legal obligations and civil fines or court-ordered restitution.

Strategy:

➢ Interview counselors. Do they have a referral system for legal services?
R8. **Student Tort Claims**

Job Corps centers must:


b. Assist students in submitting claims to the Regional Office for damage, loss, or destruction of personal property, when the property is under the control and custody of the center, in accordance with the Federal Tort Claims Act, 28 CFR Part 15, in accordance with procedures described in Appendix 602.

Strategy:

- Check SOP and Student Handbook for procedures. Review claim turnaround times. Do students know who is responsible for this?

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**Rationale for Rating:**

**QUALITY INDICATORS**

Q1. The environment is free of harassment, intimidation, and discrimination.
Strategy:

- Interview students regarding harassment, intimidation, and discrimination. Have they seen any behavior of this type? Do they feel comfortable on center regarding these issues? Do they think students leave because of harassment, intimidation, and discrimination?

- Determine if the center has a designated EEO Officer as required by the PRH. Is his or her picture posted? Are students and staff aware of who fulfills that role and of the procedures to file a complaint?

- Review the center operating procedure for civil rights, nondiscrimination, and harassment. Ensure that it meets the criteria in PRH Appendix 602. Review any EEO complaints and ensure the SOP was followed. Interview the center EEO Officer and ask for documentation of outcomes of any complaints in the past year. Determine if the complaints have been adequately resolved. Ask about any mediation efforts the center provides to intervene in harassment/EEO situations prior to complaints being filed.

- Review center efforts to provide education on sexual harassment, appropriate behavior, and the consequences to students. Are the efforts adequate? Is the content clear? Review the behavior management policy. Is it clear and firm in addressing harassment and discrimination? Are the sanctions appropriate and equally applied to male and female students?

- Interview the staff in charge of behavior management to see how he or she feels about these issues on center.

- Review behavioral files and incident reports for issues and actions that have been taken.

- Conduct interviews/focus groups with counseling staff and other staff and students to find out how they feel about this area. Do they keep track of issues such as these? Have they noticed any trends regarding early separations, etc.?

- Review files of students who have early separations. Are there any indications that students are leaving because of EEO issues?

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Rationale for Rating:
Q2. Students understand their rights and can describe the process for making a complaint of discrimination or harassment.

Strategy:

- Interview students. Do they understand the legal distinctions of discrimination, intimidation, and harassment? Can they discuss what each means? How would they make a complaint known? Who would they see? What happens? Can they talk about what might happen at work if those behaviors are displayed?

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Rationale for Rating:

Q3. Students understand and are satisfied with their ability to exercise their rights to religious freedom on and off center.

Strategy:

- Interview students. Do they feel they are able to freely express their religious beliefs?

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Rationale for Rating:
PRH 6.8 - Summary Rating

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6.9 STUDENT SUPPORT SERVICES

PURPOSE
P1. To provide students with the opportunity to exercise their voting rights.
P2. To ensure that students receive basic support services necessary for a comfortable enrollment.

REQUIREMENTS
R1. Voting Rights

Centers shall develop and implement procedures to assist students to vote locally or by absentee ballot.

Strategy:

➢ Is there a voting registration program? Interview staff and students to find out how students are informed of voting rights and how voting is facilitated.

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Rationale for Rating:

R2. Use of Students During Emergencies

Job Corps centers shall, as necessary, provide emergency assistance, if requested by public officials, when there is a threat of or an actual natural disaster.

All students used during these situations must be volunteers and be at least 18 years old or have parental consent to participate.

a. Except during community-wide relief activities, no student shall participate in emergency relief on private property or where the actions would result in private profit.

b. No student shall participate in emergency relief connected with labor shortages, strikes, riots, or civil disturbances.

Strategy:
Check to see if the center has had an emergency that required the assistance of students. If so, verify that all volunteers were over 18 or had parental consent to participate.

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Rationale for Rating:

R3. Forest Fire Suppression Activities

Centers shall allow students to participate in forest fire suppression and camp crews when the student:

a. Has completed a fire control training program.

b. Is at least 18 years old and in good physical and mental condition; however, minors may participate on camp crews with non-suppression duties in accordance with agency policies.

c. Is paid by the benefiting organization at the same rate and provided with the same rotational schedule as other firefighters.

d. Works in mopping-up no more than five days after the fire is controlled.

e. Works no longer than a total of 3 weeks, without Regional Office approval.

f. Is counted as present for duty.

R4. Laundry Services

Centers shall provide adequate laundry facilities and supplies to residential students at no cost to the student, and training to students in the proper use of laundry equipment.

Strategy:

Check laundry facilities. Are they adequate? Are there signs posted on how to use facilities? Times available?
R5. **Mail Services**

Centers shall establish a secure, confidential, and prompt system for the receipt and distribution of mail and packages through the U.S. Postal Service and commercial delivery services.

Strategy:

- Speak with the staff member responsible for mail for students. How are students notified? How are packages checked for contraband?

Rationale for Rating:

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R6. **Telephone Services**

Centers shall arrange for a sufficient number of pay telephones for student use. The establishment of toll-free numbers is not contract reimbursable and cannot be paid for with Job Corps funding.

Strategy:

- Check to see when and where phones are available. Are they in operating condition?
### QUALITY INDICATORS

**Q1.** Students are satisfied with their opportunities to vote.

**Strategy:**

- Ask eligible students if they have voted and if they know what to do in order to vote.
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Rationale for Rating:

Q2. Students feel that support services are adequate for a comfortable stay in Job Corps.

Strategy:

- Ask students about the quality and availability of support services such as postal services, laundry, etc. How do they know what is available? Ask students about specific ways the center attends to their day-to-day needs to make their stay at Job Corps more comfortable. How do they get their mail? What do they do to call home? To call off center? How are they encouraged to manage their own needs?

- Ask staff and students how student feedback is sought (committees, surveys, etc.) to assess effectiveness of support services.

- Interview students with off-center assignments to determine if the schedules and services are flexible enough to meet their needs and satisfy elements of their Personal Career Development Plan.

- Ask SGA how the quality of support services for students is measured.

- Review center procedures for forest fire suppression. Do students receive fire control training prior to participation? Do procedures meet the requirements of PRH Section 6.9, R4?
### PRH 6.9 - Summary Rating

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<th>Requirement</th>
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### 6.10 STUDENT HEALTH SERVICES

**PURPOSE**

P1. To assist students in attaining and maintaining optimal health by providing basic on-center health services to include promotion, prevention, assessment, intervention, treatment, and follow-up.

P2. To educate students on how to maintain a healthy lifestyle, which will contribute to their ability to retain employment.

**REQUIREMENTS**

**R1. Health and Wellness Program (See Exhibit 6-4, Job Corps Basic Health Care Responsibilities)**

Centers shall provide basic medical services to students. The Health and Wellness Program shall include the following components:

a. A cursory health evaluation and a medical history within 48 hours of arrival on center. The medical history shall be documented on the Job Corps Health History Form. The cursory health evaluation and medical history shall be conducted by a qualified health professional designated by the center physician.

b. A complete entrance physical examination and a review of the medical history within 14 days. The cursory evaluation, with the exception of the required entrance laboratory testing, may be omitted if the physical examination is conducted within 72 hours of a student’s arrival on center. The physical examination must be provided by a qualified health professional and documented on the Job Corps Physical Examination Form.

1. If a student refuses any part of the entrance physical examination not subject to waiver (Section 6.12, R7, Waiver of Medical Care), it may be deferred until after counseling, but no longer than an additional 48 hours beyond the scheduled physical exam. If the student continues to refuse, he or she shall receive a disciplinary separation.

2. When indicated, the center shall furnish one pair of glasses that meet American National Standards Institute (ANSI) standards.

3. Contact lenses shall be provided if clinically indicated. Students who lose or damage glasses provided by Job Corps shall replace them at their own expense.

4. Students identified as having chronic health problems during the cursory or entrance physical shall be monitored as directed by the center physician or other appropriate center health-care provider.

---

3 For a description of basic services, refer to Exhibit 6-4 (Job Corps Basic Health Care Responsibilities).
4 Reinstated and transfer students are exempt from the cursory health evaluation/physical examinations.
5 Near and distant vision screening, color vision screening, and hearing screening shall be part of the entrance physical examination.
6 As determined by the center physician who authorizes the activity by a written personal authorization.
c. Laboratory tests within the time frames shown below:

<table>
<thead>
<tr>
<th>Entrance Laboratory Testing Requirements</th>
<th>Required Time Frame</th>
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<tbody>
<tr>
<td>HIV Antibody Test</td>
<td>Within 48 hours after arrival (see waiver condition, Section 6.12, R7)</td>
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<tr>
<td>Syphilis Serology</td>
<td>Optional&lt;sup&gt;7&lt;/sup&gt;</td>
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<tr>
<td>Hemoglobin or Hematocrit</td>
<td>Within 48 hours after arrival</td>
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<tr>
<td>Sickle Cell Screening <strong>(must be offered to all at-risk students)</strong></td>
<td>Within 48 hours after arrival</td>
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<tr>
<td>Urinalysis (dipstick) for Glucose/Protein</td>
<td>Within 48 hours after arrival</td>
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<td>Drug Screen (urine)</td>
<td>Within 48 hours after arrival</td>
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<tr>
<th>Entrance Laboratory Testing Requirements—Males Only</th>
<th>Required Time Frame</th>
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<tr>
<td>Urinalysis (dipstick) for leukocyte esterase (gonorrhea screen)</td>
<td>Within 48 hours after arrival</td>
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<tr>
<td>Chlamydia Testing (urine)</td>
<td>Within 48 hours after arrival</td>
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<tr>
<td>Gonorrhea Testing if leukocyte esterase screen is positive (urine)</td>
<td>Within 48 hours after arrival</td>
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<tr>
<th>Entrance Laboratory Testing Requirements—Females Only</th>
<th>Required Time Frame</th>
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<tr>
<td>Pregnancy Test (urine)</td>
<td>Within 48 hours after arrival</td>
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<tr>
<td>Pap Smear</td>
<td>Females age ≥ 21 years (unless documented Pap smear results within 24 months before arrival on center)</td>
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<td>Within 14 days after arrival</td>
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<td>Students younger than 21 years only require pelvic/speculum exam for clinical indications such as pelvic pain, vaginitis, menstrual disorders, pregnancy, etc.</td>
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<sup>7</sup> Center physician may choose to continue screening for syphilis on entry if there is a significant prevalence in the center population.
Entrance Laboratory Testing Requirements—Females Only

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<th>Required Time Frame</th>
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<tr>
<td>All females; perform on urine if age &lt; 21 years</td>
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<tr>
<td>Within 48 hours after arrival (or at time of pelvic exam if age ≥ 21 years)</td>
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Chlamydia Testing (endocervical or urine)

Gonorrhea Testing (endocervical or urine)

Immunizations

All applicants are required to provide Admissions Counselors with current immunization records at the time of application. Records will be reviewed by center health staff on entry to determine currency of immunizations. Centers shall immunize students for the following as directed by the Office of Job Corps:

1. Immunizations or boosters if the following immunization series are incomplete or if current immunization records cannot be produced:
   (a) Tetanus and diphtheria toxoid (Td) or Tetanus-diphtheria-acellular pertussis (Tdap)
   (b) Inactivated polio vaccine (IPV) for students younger than 18 years
   (c) Measles, mumps, and rubella vaccine

2. Hepatitis B vaccine series

   At a minimum, hepatitis B vaccine shall be provided to health personnel and health occupations training students. Vaccination consent/declination must be documented in the staff member’s personnel file or student health record. Vaccination of health occupations training students must begin 6 weeks prior to on-site clinical work experience.

Refer to the Immunizations and Communicable Disease Control TAG for optional immunizations (e.g., influenza vaccine) that may be recommended but not required by the center physician, based upon availability.

Centers should utilize the Vaccines for Children program to provide immunizations for eligible students according to the latest Centers for Disease Control and Prevention (CDC) guidelines.

e. A tuberculosis skin test (Mantoux) is required of all new students who do not have documented proof of a previous negative Mantoux test taken within the last 12 months. Annual tuberculin testing should be done for students in health occupations and for students at increased risk of infection. In addition, students in
health occupations shall receive a Mantoux test prior to clinical work experience in accordance with state or local health department requirements.

Results of tuberculin skin testing should be interpreted without regard to a prior history of BCG vaccination.

Refer to Treatment Guidelines in the Health-Care Guidelines TAG, for management of students with a positive Mantoux test.

f. A daily walk-in clinic outside of the training hours for students to receive routine health care.

g. An inpatient unit (during office hours) for minor conditions, such as respiratory infections or flu symptoms.

h. An appointment system for follow-up during the training day for treatment of chronic, urgent, and other conditions within the capabilities of center health professionals. Treatment guidelines for health shall be used to manage common acute and chronic conditions.

i. Access to prescription medications.

j. An off-center specialist referral system.

k. A 24-hour emergency-care system, to include on-center CPR and first aid and written referral plan or agreement for off-center medical, oral health, mental health, substance use, and inpatient care.

l. Explain and have the student sign, on the first visit to health services, the notice describing how medical information about students may be used and disclosed, and how students can get access to this information (see Exhibit 6-10).

Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

**R2. Oral Health and Wellness Program (See Exhibit 6-4, Job Corps Basic Health Care Responsibilities)**

Centers shall provide basic dental services, as described below:
a. The general emphasis of the Oral Health and Wellness Program shall be on early
detection, diagnosis of oral health problems, basic oral-health care, dental
hygiene, and prevention/education (e.g., oral hygiene instructions, caries risk
assessments, the relationship between oral health and employability, oral health
and wellness plans).

b. A dental readiness inspection shall be completed within 14 days after arrival by
the center dentist or designee as determined by the center dentist who authorizes
the activity by a written personal authorization. The dental readiness inspection
shall be documented in the appropriate section on the Job Corps Physical
Examination Form.

c. An elective oral examination, including bitewing x-rays, priority classification,
and treatment plan, shall be completed and recorded on the Job Corps approved
oral examination form by the center dentist upon student request as a follow up to
the dental readiness inspection. The x-ray images should be securely stored as
part of the student’s health record.

d. Dental procedures to treat oral disease and correct oral health conditions that may
represent employability barriers, to include: restorations, extraction of
pathological teeth, root canal therapy on anterior/other strategic teeth,
replacement of missing upper anterior teeth with a removable prosthesis, and
dental hygiene treatment for periodontal disease.

e. Written referral plan or agreement with community facilities for emergent or
urgent conditions treatable beyond the expertise of a general dentist.

f. Job Corps shall not pay for student orthodontics. Applicants with orthodontic
appliances must furnish:
   1. Proof of orthodontic care visits during previous 3 months consistent with
      orthodontic treatment plan.
   2. Proof that a treatment plan is in place for continued care.
   3. A signed agreement that the cost of continued treatment and transportation
      related to treatment will be borne by the student, parent, or legal guardian.
   4. A signed agreement by the applicant (parent/guardian of a minor) that he or
      she will remain compliant with orthodontic care and schedule all orthodontic
      appointments such that he or she will not exceed authorized leave limits for
      elective dental treatment.

Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness
ROCA tools.

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Rationale for Rating:

R3. Mental Health and Wellness Program (See Exhibit 6-4, Job Corps Basic Health Care Responsibilities)

Centers shall provide basic mental health services as described below:

a. The general emphasis of the Mental Health and Wellness Program shall be on the early identification and diagnosis of mental health problems, basic mental health care, and mental health promotion, prevention, and education designed to help students overcome barriers to employability. The program uses an employee assistance program approach that includes short-term counseling with an employability focus, referral to center support groups, and crisis intervention.

b. Assessment and possible diagnosis, to include:

1. Assessments and recommendations for Job Corps applicants;
2. Review of Social Intake Form (SIF) or intake assessment performed by counseling staff of students who indicate mental health history, current mental health problems, or who request to see the Center Mental Health Consultant within 1 week of arrival;
3. Mental health assessments and recommendations for referred students. Students who are assessed as a safety risk to self or others must be continuously supervised, until their case is resolved. Disposition should occur as soon as possible;
4. Determination when a MSWR or medical separation is appropriate and recommended for students with mental health conditions and/or substance use co-occurring conditions.

c. Mental health promotion and education, to include:

1. Minimum of a 1-hour presentation on mental health promotion for all new students during the Career Preparation Period with an emphasis on employability;
   (a) Presentations shall explain the Mental Health and Wellness Program, what services are available, and how to make a self-referral;
   (b) Students will learn basic skills in identifying and responding to a mental health crisis.
2. Presentation(s) on managing mental health-related symptoms and behaviors in the workplace for students during the Career Development and Transition Periods;

3. At least one annual center-wide mental health promotion and education activity.

4. Clinical consultation with Center Director, management staff, and Health and Wellness Manager regarding mental health-related promotion and education efforts for students and staff;

5. Coordination with other departments/programs on center, including, but not limited to residential, recreation, student government association, and HEALs, to develop integrated promotion and education services.

d. Treatment, to include:

1. Short-term counseling defined as no more than six sessions with mental health checks as needed. The focus of these sessions should be on retention and behaviors that represent employability barriers;³

2. Collaboration with TEAP specialist for short-term counseling of students with co-occurring conditions of mental health issues and substance use;

3. Collaboration with center physician and Health and Wellness staff on psychotropic medication monitoring of stable students, with the advice of consulting psychiatrist, if appropriate;

4. Collaboration with counseling staff in developing and/or leading psycho-educational skill-building groups to promote wellness (e.g., relaxation training, anger management, mood regulation, assertiveness skills, handling relationships, sleep hygiene, etc.);

5. Information exchange through regular case conferences between the Center Mental Health Consultant, counselors, and other appropriate staff based on individual student needs;

6. Crisis intervention, as needed. In the event of a mental health emergency, the Center Mental Health Consultant or the center physician shall conduct a mental health evaluation as soon as possible, and when necessary, refer the student for psychiatric care. If the center physician or Center Mental Health Consultant is not available, the student shall be referred immediately to the emergency room of the nearest medical facility. If there is a life-threatening situation, 911 or the emergency response team should be called;

7. Referral to off-center mental health professionals or agencies for ongoing treatment and/or specialized services;

8. A written referral/feedback system shall be established and documented in the student health record.

³ Centers with intern, extern, or practicum graduate students may exceed this number and provide sessions that are skill based with a focus on managing behaviors and mental health symptoms in the work environment.
Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

QUALITY INDICATORS

Q1. Students are aware of the center’s health care delivery system and understand how to seek on-center health care.

Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

Q2. Students demonstrate a clear understanding of their individual health condition and treatment prescribed.

Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.
Q3. Students’ health status will be maintained or improved while they are at Job Corps.
Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

PRH 6.10 - Summary Rating

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6.11 RELATED HEALTH PROGRAMS

PURPOSE

P1. To provide prevention and intervention services and short-term treatment that will enhance student participation in the program and employability.

P2. To promote healthful choices that will have a positive impact on student physical and emotional well-being.

P3. To provide students with information and skills that will allow them to make appropriate choices regarding their health care needs, and to demonstrate acceptable workplace behavior that will enhance their opportunity for employment.

REQUIREMENTS

RI. Trainee Employee Assistance Program (TEAP) (See Exhibit 6-4, Job Corps Basic Health Care Responsibilities)

Centers shall provide basic TEAP services, as described below:

a. The general emphasis of TEAP shall be on prevention, education, identification of substance use problems, relapse prevention, and helping students overcome barriers to employability.

b. Substance use prevention and education, to include:

1. Minimum of a 1-hour presentation on substance use prevention for all new students during the Career Preparation Period. This presentation shall explain (1) TEAP prevention, education, and intervention services, (2) Job Corps drug and alcohol testing requirements and procedures, and (3) the consequences of testing positive for drug or alcohol use while in Job Corps;

2. Presentation(s) on managing substance misuse, abuse, and dependency symptoms and issues in the workplace for students during the Career Development and Transition Periods;

3. At least three annual center-wide substance use prevention and education activities;

4. Clinical consultation with Center Director, management staff, Center Mental Health Consultant, and Health and Wellness Manager regarding substance use prevention and education efforts for students and staff;

5. Coordination with other departments/programs on center, to include, but not be limited to, residential, recreation, student government association, and HEALs, to develop integrated prevention and education services.

c. Assessment for identification of students at risk for substance use problems to include:

1. Review of Social Intake Form (SIF) or intake assessment of all students performed by counseling staff within 1 week of arrival;
2. Formalized assessment measures (e.g., SASSI3 or SASSIA2), and clinical judgment to determine students’ level of risk for substance use;

3. Collaboration with the Center Mental Health Consultant to determine when a MSWR or medical separation is appropriate and should be recommended for a student with substance use conditions (see Section 6.11, R1, e5).

d. Intervention services for students identified at an elevated risk for substance use, to include:

1. Individual and group intervention services with a focus on behaviors that represent employability barriers;

2. Collaboration with the Center Mental Health Consultant for students with co-occurring conditions of mental health issues and substance use;

3. Referral to off-center substance abuse professionals or agencies for ongoing treatment and/or specialized services. Any student separating from Job Corps who has a substance use condition shall be provided with a referral for support services in his or her home community.

e. Drug and alcohol testing

1. Drug testing procedures

(a) Students in the following categories shall be tested for drug use:

   (1) New and readmitted students shall be tested within 48 hours of arrival on center.

   (2) Students who tested positive on entrance shall be retested between the 37th and 40th day after arrival on center.

   (3) Students who are suspected9 of using drugs at any point after arrival on center (including during the 45-day intervention period) shall be tested; this testing shall take place as soon as possible after staff suspects use.

   (4) Students who tested negative on entry and then positive on suspicion shall be retested between the 37th and 40th day after the positive suspicion-of-drug-use test.

(b) Biochemical testing is never permissible on a random basis, with the exception of designated licensed student drivers who are subject to 49 CFR Part 391 DOT Federal Motor Carriers Safety Administration. In addition, biochemical testing requested by work experience sites, union trades, or potential employers may only be performed by the requesting entity.

(c) If a student refuses to provide a specimen or has an unexcused absence from his or her follow-up drug test, he or she shall be

9 Reasonable suspicion includes (1) direct observation of drug use or behavioral signs or symptoms suggestive of drug use, or (2) reliable information that a student recently used drugs.
referred to the center’s behavior management system for appropriate disciplinary action. Students who state they are unable to produce a specimen shall be referred to the center physician or designee for follow up.

(d) Collection of urine for drug testing shall be in accord with chain-of-custody principles and conducted by health and wellness staff or a staff member trained in urine collection procedures.

(e) The Job Corps nationally contracted laboratory shall be used for all required drug testing. On-center urine drug testing is prohibited.

(f) Reinstated students shall not be subject to entry drug testing upon return to the center. Transfer students shall not be subject to drug testing upon arrival at receiving center. Both reinstated and transfer students shall be subject to testing for drugs upon suspicion of use only.

2. Alcohol testing procedures

(a) Students who are suspected\(^\text{10}\) of using alcohol at any point after arrival on center shall be tested; this testing shall take place immediately after staff suspects use.

(b) Centers shall use devices that measure alcohol in the breath or saliva (e.g., breathalyzers or alcohol test strips/tubes/swabs). Alcohol testing shall only be administered by a staff member trained in the use of these testing devices. All testing shall be documented and the results submitted to the health and wellness center.

3. Students testing positive for drug or alcohol use:

(a) New students and readmitted students not previously separated for drug use (ZT separation code 05.2a) who test positive on entry shall receive intervention services and a follow-up drug test. The results of the follow-up drug test shall be received on center prior to the end of the 45-day intervention period.

To remain in the program, students who test positive on entry must have a negative drug-test result within the 45-day intervention period.

If an intervention period takes place during a center vacation period (i.e., summer break or winter break), the intervention period is suspended and resumes the day the student is scheduled to return to the center (e.g., if a student is on day #30 of his or her intervention period at the time of the center vacation, the day count will be suspended at 30 days, and resume as day #31 the day he or

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\(^{10}\) Reasonable suspicion includes (1) direct observation of alcohol use or behavioral signs or symptoms suggestive of alcohol use, or (2) reliable information that a student recently used alcohol.
she is due back on center). If a student does not report to the center on the day he or she is expected to return, the intervention period still resumes and the student is labeled AWOL.

Students who are AWOL on the day of their scheduled follow-up drug test will be tested on the day they return to the center. If this drug test is positive and the results are not received before the end of the 45-day intervention period, the student will be separated under the ZT policy and the separation will be counted in the center’s statistics. Students AWOL during the intervention period who never return to the center cannot be separated under code 05.2a (a positive drug test is required for a 05.2a ZT separation); instead, the student shall be separated as AWOL.

(b) Readmitted students previously separated for drug use (ZT separation code 05.2a) who test positive on entry or any time during their second enrollment at Job Corps must be separated immediately without a 45-day intervention period. Such students shall not be allowed to reapply to Job Corps.

(c) Students who tested negative on entry but test positive on suspicion of drug use any time after entry shall be given a 45-day suspicion-intervention period, which shall begin on the day of collection of the specimen.

To remain in the program, such students must have a negative drug test result within the 45-day suspicion-intervention period.

Students who test positive within the 45-day suspicion-intervention period shall be separated in accordance with the ZT policy specified in Chapter 3. During the 45-day suspicion-intervention period, students in the driver’s education program and student drivers who fall under DOT regulations are not permitted to drive. A second positive suspicion-of-drug-use test at any time thereafter will result in immediate separation in accordance with the ZT policy. (Students who tested positive on entry but tested negative at the end of the initial 45-day intervention period are not eligible for suspicion-intervention services and will be separated under the ZT policy for a positive suspicion-of-drug-use test.)

(d) Students who test positive for drug use by an off-center facility shall be retested on center using the Job Corps nationally contracted laboratory as soon as possible, to include:

(1) Work-based learning students who tested positive on a drug test administered by experience sites, union trades, or potential employers;
(2) Students who tested positive on a drug test administered at a referral health facility (e.g., hospital emergency department, urgent care facility).

This retest by the Job Corps nationally contracted laboratory shall be classified as a suspicion-of-drug-use test. For students who test positive for drug use on this retest, centers shall follow the same procedures outlined in (c) above.

(e) Student drivers who test positive for drug use under 49 CFR Part 391 DOT Federal Motor Carriers Safety Administration shall follow the same procedures outlined in (c) above for positive suspicion tests. In addition, during the 45-day suspicion-intervention period, student drivers who fall under DOT regulations are not permitted to drive.

(f) Students who test positive for alcohol use on suspicion shall be referred to the TEAP specialist for assistance and the center’s student conduct system for disciplinary action.

4. Student notification of drug or alcohol test results

(a) Students who test positive for drug use shall be informed of their results by the TEAP specialist, center physician, or designee within 24 hours of receipt of positive result, or as soon as possible, given staff and student availability. Minor student’s parent/guardian shall be notified of positive test results as required by applicable state laws for the state in which the center is located.

(b) Alcohol test results shall be provided to the student by the person administering the test.

(c) Drug and alcohol test results shall be shared only with center personnel who have a need to know for purposes of discipline, counseling, administration, and delivery of services (in accordance with 42 CFR, Part 2).

(d) If a student questions the validity of a confirmed positive drug test, he or she shall be referred to the center physician or designee for counseling.

5. Medical Separations with Reinstatement Rights (MSWR) for substance use conditions

(a) Students may be given a MSWR for a diagnosed substance use condition, allowing the student to return to Job Corps to complete his or her training within 180 days. To return to Job Corps, proof of treatment completion from a qualified provider must be received.

(b) A MSWR for substance use conditions can only be given if the following conditions are met:
(1) The TEAP specialist and center director agree that the student has a diagnosed substance use condition.

(2) There is a documented assessment of the student’s diagnosed substance use condition by the TEAP specialist in collaboration with the center mental health consultant.

(c) A MSWR cannot be granted in lieu of ZT separation when a positive 45-day intervention period follow-up test is reported.

(d) If a student is placed on a MSWR during the 45-day intervention period, the intervention period is suspended and resumes the day the student is scheduled to return to the center.

Strategy:

➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

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**R2. Health Aspects of Sports**

a. All students participating in organized contact or rigorous sports (e.g., football, basketball, boxing, and running) shall be medically cleared by a health professional prior to participating. Physical examinations performed by center health personnel within one year of the organized sports activity can fulfill this requirement, at the discretion of the center physician. After one year, a current physical examination is required.

b. A staff member trained in CPR/first aid, with specific authorization in the center’s standing orders, must be present at all organized contact or rigorous sports activities, including practice sessions and sports events.

c. At a minimum, staff certified in CPR/first aid must be present at all student boxing events and contact football games.

d. In case of possible emergency, adequate transportation must be on the scene of all center-sponsored organized sports.
Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

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**R3. Tobacco Use Prevention Program (TUPP)**

Implement a program to prevent the onset of tobacco use and to promote tobacco-free environments and individuals. To support this program, a TUPP Coordinator shall be appointed (he or she need not be a health services staff member). At a minimum this program shall include:

a. Educational materials and activities that support the delay and/or cessation of tobacco use.

b. A smoke-free, tobacco-free environment that prohibits the use of all tobacco products in center buildings and center-operated vehicles.

c. Designated outdoor smoking areas located a minimum of 25 feet, or as required by state law, away from the building entrance.

d. Prohibition of the sale of tobacco products on center.

e. Adherence to federal and state laws regarding the use of tobacco products by minors.

f. Minors who use tobacco products shall be referred to the TUPP.

g. All services provided should be documented in the student health record.

Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.
R4. Family Planning Program

a. A family planning program shall be provided to all students on a voluntary basis. At a minimum, this program shall include counseling, health promotion activities, and medical services. The Center Director shall appoint a staff member to implement and monitor this program.

b. If a student is determined to be more than 12 weeks pregnant on arrival, she shall receive a medical separation with reinstatement rights (see Section 6.4, Student Enrollments, Transfers, and Separations).

c. If a student is less than 12 weeks pregnant on arrival or becomes pregnant after enrollment, center staff shall determine whether (1) she is sufficiently motivated to continue her training, and (2) her particular needs can be met by resources available at the center and/or in the community.

d. Pregnancy program services at a minimum shall include information on the options of continuing or terminating the pregnancy.

1. If a student wishes to terminate her pregnancy, the center shall identify available community health/social resources and the student shall be given leave without pay/allowances for the medical procedure. The center shall not pay for direct or indirect services or expenses (i.e., transportation or staff escort), unless the Center Director and center physician consider the procedure necessary to safeguard the life of the student or in the case of rape. Under such circumstances the center shall pay for services and place the student on leave with pay and allowances.

2. If the student chooses to continue her pregnancy while enrolled in Job Corps, the center shall:

   a) Provide or arrange for prenatal care until separation, to include a comprehensive gestational record.

   b) As required by applicable state laws where the center is located, notify the student’s parent/guardian of her pregnancy.

   c) Provide a medical separation with reinstatement at the end of the student’s 28th week of pregnancy. Longer retention is permitted at
the discretion of the Center Director, based on the recommendation of the center physician.

Strategy:

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Rationale for Rating:

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**R5. HIV/AIDS**

Centers shall:

a. Test students for HIV infection under the following circumstances:
   1. As part of the cursory medical examination (see Section 6.10, R1.c).
   2. If a student exhibits signs and/or symptoms of a possible AIDS-related condition.
   3. Upon reasonable suspicion of student exposure to HIV.
   4. When student is diagnosed with a newly contracted sexually transmitted disease.
   5. When student is discovered to be pregnant.
   6. Upon student request and after physician consultation.

b. Submit specimens for HIV testing to the nationally contracted laboratory. Centers shall not be reimbursed for HIV tests performed at other than the nationally contracted lab.

c. Provide pre-test counseling, in accordance with state laws, to all students regarding the HIV test.
   1. Counsel each student about the test and its implications and document in the health record that the student received the HIV pre-test counseling and signed the “HIV Testing Information Sheet” in Exhibit 6-12.
   2. Student refusal (see Section 6.10, R1, b.1).
3. Testing waiver (see Section 6.12, R7, Waiver of Medical Care).

d. Provide post-test counseling, in accordance with state laws, to all students regarding HIV test results.

1. **HIV Negative Students.** Individually inform and counsel (e.g., measures to prevent HIV infection/transmission) all students with a negative HIV test result within 14 calendar days after receipt of test results.

2. **HIV Indeterminate Students.** Individually inform and counsel all students with an indeterminate HIV test result within five calendar days after receipt of test results. A student who has an indeterminate test result shall be retested at three-month intervals until a conclusive test result (i.e., negative or positive) is obtained. If a conclusive result is not obtained within six months, no further testing is required.

3. **HIV Positive Students.**
   
a. **Inform and Counsel.** Individually inform and counsel all students with a positive HIV test result, preferably within 24 hours, but not later than five calendar days, after receipt of the written positive result. The center Mental Health Consultant must be in attendance to assist in informing and counseling.

   b. **Contact Notification.** HIV positive students must be instructed in how to notify their sexual contacts and intravenous drug contacts that they may have been exposed to HIV infection and to refer them for counseling and testing.

      The center physician or designee shall report the student’s HIV infection to the state and/or local health department, which will be responsible for contact notification both on and off center.

4. **Students Off Center.** If a student is not on center (e.g., AWOL, on leave) when his or her positive or indeterminate test result is received by the center, the Center Director or designee must make every attempt to contact and inform the student of his or her result. The health department at the student’s location shall be used to assist with the task of informing students who are no longer on center.

5. Document post-test informing and counseling activities in the student’s health record, including attempts to contact students not on center (d.4 above).

e. Ensure that students who test positive for HIV infection are engaged in an interactive process to determine if an accommodation plan is needed (see center reasonable accommodation policy/process or national reasonable accommodation guidelines for specific requirements of accommodation process).

f. Ensure that students who test positive for HIV infection are engaged in case management for chronic illness on center.
g. Provide all students with information on HIV infection, including transmission and prevention (see PRH Section 3.17, R1 and Section 6.12, R10).

Strategy:

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Rationale for Rating:

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**R6. Sexual Assault Prevention and Response**

Centers shall:

a. Establish a program for sexual assault prevention, counseling, treatment, and follow-up care.

b. Develop a team response to sexual assault and involve center staff and outside resources.

c. Report sexual assaults:

1. To law enforcement authorities as required by state and local law.

2. As significant incidents (see Chapter 5, Section 5.5, Management and Reporting of Significant Incidents).

Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:
R7. Healthy Eating and Active Lifestyles

Centers shall provide students with an environment that supports healthy eating and active lifestyles and provide students with education and experiences that promote lifelong health and physical well being. At a minimum this program shall include the following components:

a. Planning
   1. Establish a Healthy Eating and Active Lifestyles Committee to oversee and coordinate this program. At a minimum, this committee shall include the Health and Wellness Manager, Food Services Manager/supervisor, Recreation Supervisor or specialist, TEAP Specialist, Residential Manager, and student representative.
   2. Incorporate student interests and preferences when planning activities.
   3. Demonstrate collaboration between various departments on center.

b. Environment
   1. Provide a variety of fitness activities open to all students as outlined in Section 3.18, R2.
   2. Provide healthy eating selections and limit non-nutritious eating selections as outlined in Section 6.7, R1.

c. Education and counseling
   1. Provide educational activities and materials to all students that support regular physical activity, nutrition, and achieving a healthy weight as outlined in Section 3.17.
   2. Provide individualized weight management programming and/or counseling. Student participation in this program is highly recommended.
   3. Incorporate motivational interviewing and goal setting at student’s level of readiness for change.

d. Assessment
   1. Document, monitor, and assess program.

Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.
QUALITY INDICATORS

Q1. Students can describe appropriate lifestyle choices.

Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

Q2. Students take personal responsibility for maintaining good health.

Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.
Q3. Students are able to identify and access appropriate health-related programs to meet individual needs.

Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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6.12 HEALTH ADMINISTRATION

PURPOSE

P1. To ensure that quality health services are delivered in a professionally caring and cost-effective manner.

REQUIREMENTS

R1. Staffing

Centers shall:

a. Ensure that health service staffing is in compliance with the staffing levels presented in Exhibit 6-5 (Center Health Services Staffing Requirements) and the minimum staff qualifications identified in Chapter 5, Exhibit 5-3 (Minimum Staff Qualifications).

b. Employ or subcontract with medical, dental, TEAP, and mental health professionals (on both contract and conservation centers) subject to the prior approval of the Regional Office, in consultation with the Regional Health Specialists.

c. Ensure that a health professional cannot serve as a consultant to, or an employee of, two or more Job Corps-related entities concurrently, when one entity has review and/or oversight responsibilities over the other(s). (Entities include Job Corps centers, health support contractors, and center operators.)

Strategy:

➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

R2. Authorizations (Consent for Treatment)

Centers shall ensure that proper authorizations are obtained prior to delivery of health services to students.

a. The signed consent form (ETA-653) serves as authorization for basic routine health care and shall be placed in the student health record by the time a student
arrives on center. Additionally, each student shall have a signed Informed Consent to Receive Mental Health and Wellness Treatment form in the student health record by the time the student arrives on center.

b. Each time a student requires services other than those covered under the blanket consent signed on admission; written consent shall be obtained from the student or parent/legal guardian.

c. In emergency situations, the Center Director may make an exception to the requirement for consent when a student who has reached the age of maturity cannot give consent or a parent/guardian of a student under the age of maturity cannot be contacted. This shall be documented in the student’s health record.

Strategy:
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Rationale for Rating:

**R3. Basic Health Services Provided by Job Corps Centers**

a. Center operators are responsible for providing and paying for basic health care as detailed in Exhibit 6-4 (Job Corps Basic Health Care Responsibilities).

b. Job Corps shall not pay for any health-related costs incurred by a student while on leave or pass unless previously authorized by the Center Director upon recommendation of a center health professional.

Strategy:
➢ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.


R4. **Health and Medical Costs Exceeding Basic Health Services Provided by Job Corps Centers**

a. Centers should assist students in seeking third-party health insurance coverage that will be available should the student have medical needs or costs beyond the basic health services provided by the center.

b. If a student is determined to have a pre-existing or acquired health condition that significantly interferes with or precludes further training in Job Corps, or if a student is determined to have a health problem that is complicated to manage or for which necessary treatment will be unusually costly, the center must follow medical separation procedures (Section 6.12, R11, and Section 6.4, R4.c.5) and determine whether referral to the Office of Workers’ Compensation Programs (OWCP) is required (Section 6.12, R8).

Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

R5. **Professional Standards of Care**

All center health staff and providers shall follow accepted professional standards of care and are subject to prevailing state laws, including but not limited to:
a. Maintaining a copy of current provider’s license, DEA registration, and proof of liability insurance, if applicable, in center health facility.

b. Documenting all prescribed medications and treatment in student health record.

c. Documenting all laboratory procedures ordered and recording the results in student health record.

d. Following current standards of care when providing health services and treating illnesses and injuries.

Strategy:

➢ This area is assessed by the Job Corps health support contractor using health and wellness ROCA tools.

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Rationale for Rating:

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**R6. Controlled Substances**

Centers shall comply with all state and federal regulations regarding controlled medications and shall:

a. Purchase, store, and administer all controlled substances in accordance with the regulation at 21 CFR Part 1300. Each center must maintain a controlled medication log and have a Drug Enforcement Administration (DEA) registration. The center can obtain its own registration or use the center physician’s DEA registration number when ordering controlled substances.

b. Limit the use of controlled medications and stock only a small supply of those medications that will be prescribed by the center physician, center dentist, or psychiatrist. Documentation must be maintained showing that controlled medications in stock were prescribed by one of these individuals.

c. Not stock Schedule II medications on center except when prescribed for a specific student. In such a case, the center shall order enough medication for a month’s treatment for the student.

d. Store all Schedule II, Schedule III, and Schedule IV medications under a double-lock system in a secured area of the Health and Wellness Center. Only Health

July 28, 2014
and Wellness staff who are authorized under their state license to dispense or administer controlled medications shall have access to the controlled medications.

e. Ensure that two staff (one must be staff authorized under their state license to dispense or administer controlled medications) receive and sign for medications received, noting the name(s) of the medications, dosage, amount, and date on a controlled medication log.

f. Maintain a log of all Schedule II, Schedule III, and Schedule IV medications. When dispensing or administering these medications by order of the health care practitioner, the date, time, medication, and dosage shall be noted on the log and the nurse dispensing or administering the medication must sign his or her full name. The log shall be maintained in the locked area designated for controlled medications.

g. Inventory and reconcile controlled medications at least once a week. Two authorized staff members shall note the results on the controlled medications log. Any miscounts or missing medications identified during the inventory shall be immediately reported to the Regional Office by the Center Director.

h. Properly dispose of controlled medications that need to be destroyed because of expiration dates, contamination, or wastage, and document such actions on the controlled medications log. The log must be signed by two staff members (one of whom must be a Health and Wellness staff member).

Strategy:

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Rationale for Rating:

**R7. Waiver of Medical Care**

a. If a student refuses the pelvic exam, the center may defer it until after specialized counseling. If the student continues to refuse the **pelvic exam** two weeks after such counseling, a disciplinary separation may be necessary. The center physician may waive the pelvic examination if in his or her opinion there is sufficient justification. Such a waiver shall be clearly documented by the center.
physician in the student’s health record and include an explanation as to why the decision was made.

b. If a student refuses to submit to HIV testing, the center may defer it until after specialized counseling regarding HIV infection and AIDS. Such counseling should include the benefits of early diagnosis and the efficacy of available treatments. If two weeks after such counseling the student continues to refuse the HIV test, a disciplinary separation may be necessary. The center physician may waive the HIV test if in his or her opinion there is sufficient justification. Such a waiver shall be clearly documented by the center physician in the student’s health record and include an explanation as to why the decision was made.

c. The center physician may grant waivers of immunization requirements for valid medical and/or religious reasons. Such a waiver shall be clearly documented by the center physician in the student’s health record and include an explanation as to why the decision was made.

Strategy:
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Rationale for Rating:

R8. **FECA/OWCP**

a. Students are considered federal employees for purposes of the Office of Workers’ Compensation Programs (OWCP). OWCP benefits do not begin to accrue until the day following a student’s separation from the program.

b. The center shall complete the appropriate OWCP form(s) whenever a student is injured, develops an occupationally related illness, or dies while in the performance of duty. The center shall immediately comply with the procedures set forth in the Employment Standards Administration regulations at 20 CFR Chapter 1. The CA form portion of the SHIMS form and a copy of the ETA Form 6-61 (Notice of Student Separation) shall be filed with the OWCP district office only when the injury or illness results in separation and consent is received from the National Office. When separation does not occur, such forms shall be maintained in the student’s health record.
c. If the student dies while in Job Corps, the center shall:

1. Inform the next of kin of any possible FECA benefits if death occurred during the performance of duty. If the student did not die during the performance of duty, the government shall pay only for expenses involved in the preparation and transportation of the remains to a mortuary in the area selected by the next of kin, within the United States and its possessions.

2. Arrange for burial at a site close to the center and at a cost not to exceed the amount authorized in Section 8134(a) of the Federal Employees’ Compensation Act in the event that the next of kin refuses to accept the remains.

3. Provide the National Office of Job Corps with documentation authorizing OWCP eligibility. If next of kin is eligible for benefits, further review by the National Office shall determine if any additional gratuity payments, not to exceed $10,000 in accordance with Section 651 of Public Law 104-208 (The Omnibus Consolidated Appropriations Act), shall be awarded.

Strategy:

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Rationale for Rating:

**R9. Health Care Guidelines**

a. All health care guidelines shall be approved and signed annually by the center physician, CMHC, or center dentist, as appropriate.

b. Current signed and dated health care guidelines shall be kept in the Health and Wellness Center.

c. Annually, each center shall submit a memorandum to the Regional Office indicating which health care guidelines have been modified. Copies of any individual health staff authorizations and health care guidelines that have changed shall be sent to the Regional Office for approval. (Refer to Chapter 5, Exhibit 5-2, Plan and Report Submission Requirements, for reporting deadlines.)
Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

**R10. Student Introduction to Health Services**

Centers shall provide an overview of health services to new students by a member of the health services staff during the Career Preparation Period. This shall include an explanation of procedures/tests that are performed as part of the medical and oral exam, information on HIV and other sexually transmitted diseases, safe sex practices, family planning services, TEAP services, mental health services, the importance of good health to obtain/maintain employment, and the Notice describing how medical information about students may be used, disclosed, and how students can get access to this information.

Strategy:

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Rationale for Rating:

**R11. Medical Separations**
Centers shall ensure that:

a. Medical separations are initiated by health services staff.

b. Students are medically separated when they are determined to have a pre-existing or acquired health condition that significantly interferes with or precludes further training in Job Corps, or the health problem is complicated to manage, or the necessary treatment will be unusually costly.

c. If the center physician estimates that the student will be able to return to the center within 180 days, a medical separation with reinstatement rights (MSWR) will be given. If the student’s condition cannot be stabilized in 180 days, a regular medical separation will be given and the student may reapply in one year.

d. Health and social service referrals are provided for all separated students.

e. For medical separation with reinstatement rights (MSWR), students are contacted monthly by the Health and Wellness Manager to assess progress and plan their return to Job Corps within the 180 days allowed.

Strategy:

➤ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

**R12. Death**

In the event of a student’s death, the center shall follow Significant Incident Report (SIR) reporting requirements (see Chapter 5, Section 5.6) and send the entire student personnel record (including sealed health record) to the National Office of Job Corps by signature-required mail or delivery within 10 days. The sealed health record shall include OWCP forms, written notification of death, plus the death certificate and autopsy and toxicology reports if available.

Strategy:

➤ This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.
R13. **Communicable Disease and Infection Control**

The center shall:

a. Report cases of disease to state and local health departments in accordance with state and local laws (see Chapter 5, Management).

b. Manage all cases of communicable disease and use protective measures as recommended by the Centers for Disease Control and Prevention (CDC).

c. Biologically monitor the function of autoclaves and maintain a log of spore test results.

d. Follow infection control measures as mandated by state and federal law.

**Strategy:**

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

R14. **Equipment and Supplies**

The center shall:
a. Provide necessary equipment and supplies for routine and emergency delivery of basic medical, dental, and mental health services. All such equipment shall comply with federal and state requirements.

b. Purchase major dental equipment according to the current dental equipment list published periodically by the National Office of Job Corps.

c. Maintain records on the dispensing, inventory, and disposal of medical and dental supplies and pharmaceuticals.

d. Purchase from government supply service centers (GSA, HHS, VA), whenever possible.

Strategy:

- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:

R15. Continuous Quality Improvement

Center health staff shall seek feedback from students, employ mechanisms to document quality of care provided, and document quality improvement activities.

Strategy:

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Rationale for Rating:
**R16. Monthly Meetings with Center Director**

The Center Director shall meet monthly with the center physician and CMHC to discuss clinical and organizational issues.

**Strategy:**
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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**Rationale for Rating:**

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**R17. Reporting**

Centers shall ensure that the following reports are submitted (see Chapter 5, Exhibit 5-2):

- a. Health and Wellness Center Program Description
- b. Health Services Utilization Report
- c. Alcohol Testing Report

**Strategy:**
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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**Rationale for Rating:**

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QUALITY INDICATORS

Q1. Students utilize available health services appropriately.

Strategy:
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Rationale for Rating:

Q2. Students are satisfied with the quality and delivery of health services.

Strategy:
- This area is assessed by the Job Corps health support contractor using Health and Wellness ROCA tools.

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Rationale for Rating:
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6.13 CHILD CARE ARRANGEMENTS

PURPOSE

P1. To provide assistance to Job Corps applicants in arranging suitable child care for their dependent children so that they may enroll in the Job Corps program.

P2. To provide students with access to child care services for their children.

REQUIREMENTS

R1. Establishment of Child Care Arrangements

a. Prior to enrollment, Job Corps Admissions Counselors shall assist parenting applicants with identifying and establishing suitable arrangements for the care of dependent children.

b. During enrollment, centers shall assist parenting students in maintaining suitable child care arrangements for dependent children.

Strategy:

- Interview Admissions Counselors or center staff to determine how they assist applicants/students in making child care arrangements.

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Rationale for Rating:

R2. Identification of Local Child Care Resources

a. Centers shall promote the development and implementation of local linkages for child care for students to the maximum extent feasible.

b. Centers located in areas where local child care programs cannot meet student needs, and which have space and non-Job Corps funding sources for child care, may request approval to establish on-center child development programs, in accordance with requirements in PRH Appendix 604 (Job Corps Child Development Programs).

Strategy:

- Interview center staff to determine what local child-care resources have been identified and what linkages have been established to assist parenting students.
QUALITY INDICATOR

Q1. Parenting Job Corps students maintain suitable child care arrangements for the duration of their enrollment period.

Strategy:

➢ Interview parenting students. Determine how center staff members have assisted in helping them maintain child care arrangements during enrollment.

Rationale for Rating:

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6.14 DISABILITY PROGRAM

PURPOSE

P1. To provide individualized and coordinated services to all students with disabilities.

P2. To provide a Disability Program with a center-wide focus.

P3. To ensure equal opportunity for all students, including those with disabilities.

P4. To ensure all policy and legal requirements related to serving students with disabilities are met.

P5. To ensure access for students with disabilities that focuses on employability and independent living.

REQUIREMENTS

R1. Disability Coordinators

a. The Health and Wellness Manager (or a health staff designee) and Academic Manager (or an academic staff designee) will function as Disability Coordinators (DCs) to oversee the program. Additional DCs may be appointed. Centers may choose to hire a full or part time DC to oversee the program rather than or in addition to appointing an academic and health DC.

b. The roles and responsibilities of each DC will be defined in an SOP.

Strategy:

➢ This area is assessed by the accommodation support contractor using their ROCA tools.

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Rationale for Rating:

R2. Applicant File Review Process

a. To ensure equal opportunity for all applicants, including those with disabilities, all centers are required to follow the same applicant file review process. This process will be described in an SOP (See Exhibit 5-1) that describes in detail how an applicant file is processed, from the time it is received from the admissions contractor, until the applicant is accepted into the program and assigned a start date, or recommended for denial and a final disposition is made by the Regional Office.
b. The applicant’s file must be processed within 30 calendar days from receipt by center. If the center reasonably can substantiate needing longer than 30 days to complete the file review process, then an extension may be discussed with the respective Regional Office Project Manager.

c. While each center file review procedure may have unique aspects, all center procedures must incorporate the following requirements:

- Location where files are sent and logged in upon arrival to the center and the method of tracking the movement of the file to include an explanation of the center’s disposition of the file.
- Responsibilities and roles of applicant file review team members to include the Health and Wellness Manager, the center clinicians, and the center’s disability coordinator(s) which usually will include the center’s Health and Wellness Manager.
- Procedures for reviewing an applicant file to include the acceptable reasons for recommending denial of an application.
- Procedures for reviewing and determining reasonable accommodation.
- Procedures for processing application withdrawals both before and after submitting a file for regional review.
- Timeframe the center establishes to complete the file review process to ensure it meets the PRH required timeframe of 30 calendar days.
- Storage, transmission and maintenance of the applicant file information (see Appendix 607).

See 1.4, R1-3 and Appendix 107.

Strategy:

➢ This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:
R3. Reasonable Accommodation Process

a. An applicant or student with a disability may request and receive reasonable accommodation to participate in the Job Corps program at any time during the admissions process or enrollment. Each center will have a process for ensuring applicants/students with disabilities who request accommodation, indicate they may need accommodation, and/or provide documentation of a disability are engaged in an interactive process to consider/determine the functional limitations resulting from their disability and the potential accommodations that would allow them to participate in the Job Corps program. An SOP describing this process is required (See Exhibit 5-1) and it and the center’s reasonable accommodation process will include all the components outlined in Appendix 605.

b. The DCs will coordinate the center’s reasonable accommodation process.

c. During Career Transition Readiness all students will receive information about workers rights and responsibilities including reasonable accommodation in the workplace (see Section 3.21, R2, g).

Strategy:

- This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:

R4. Introduction to Center Life

a. Centers shall provide new students with information that will lead to an understanding of the opportunities and benefits available as part of the center’s Disability Program (see Section 2.2, R1, b11).

b. Centers shall provide a variety of opportunities for new students to meet and interact with the DCs (see Section 2.2, R1, d4).

c. The student handbook will include information about the Disability Program (see Sections 2.2, R1, b and 2.2, R2).

Strategy:

- This area is assessed by the accommodation support contactor using their ROCA tools.
R5. **CIS Disability Data Collection and Accommodation Plans**

a. A DC will accurately enter the required data in the disability data collection and accommodation plan icons in CIS as soon as possible after the student enters the program.

b. For students who require TABE testing accommodations, this data will be entered prior to the administration of the first TABE test.

c. Only the DCs will have access to the disability data collection entry screen, disability data report and the accommodation plan report with notes report in CIS.

d. Generally only the DCs will have access to the accommodation plan entry screen; however, if a designee is appointed to enter accommodation plans, this staff person can have access.

e. All center staff responsible for providing accommodations will have access to the accommodation plan report in CIS.

f. Accommodation plans will not contain any medical or diagnostic information.

**Strategy:**

- This area is assessed by the accommodation support contactor using their ROCA tools.
**R6. Partnerships/Resources**

a. Each center must develop resources and partnerships with outside agencies and programs that will assist the center in serving students with disabilities. Special focus should be given to developing resources and partnerships that can assist the center in identifying or providing accommodation support that promotes student independence and employability.

b. The Business and Community Liaison staff and other appropriate staff should be involved in this process.

c. Each center will document efforts to develop resources/partners by completing the Disability Partnership Tool available on the Job Corps Disability website or their customized Disability Partnership Tool available from their Regional Disability Coordinator.

**Strategy:**

- This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:

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**R7. Referral Process**

a. A written referral/feedback system shall be established to document a referral to the DCs when a student discloses a disability and may want reasonable accommodation or staff suspects a student may have a disability that is impacting his/her success in the program and should meet with the DCs to consider reasonable accommodation.

b. All referral forms will be stored in the student’s accommodation file or in the student health record if no accommodation file exists.

**Strategy:**

- This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:

**R8. Readily Achievable Barrier Removal**

Each center must consider readily achievable barrier removal—things center staff can do to make the center more accessible that are easily accomplishable and able to be carried out without much difficulty or expense. To accomplish this, centers must:

a. Determine potential improvements to the physical accessibility (e.g., ramps, elevators, adjustable work stations, restrooms, etc.) of the center, by completing the ADA Checklist for Readily Achievable Barrier Removal (a link to this checklist is available on the Job Corps Disability website).

b. Determine potential improvements to the programmatic accessibility (e.g., communication options such as audio tapes, large print, etc.; center’s public materials contain a statement that reflects a commitment to providing reasonable accommodations for all of their programs, etc.) of the center, by completing the program Center Accessibility Tool (this document is available on the Job Corps Disability website).

c. Develop an accessibility plan with priorities and next steps based on the results of the ADA Checklist for Readily Achievable Barrier Removal and Center Accessibility Tool. The plan will be used as a tool for center staff to think about the simple things that can be done to ensure that students with disabilities can access/participate in the program on an equal basis with students without disabilities. This plan is not intended to be used to determine compliance for new construction or facilities being altered and is separate from the center’s facility survey requirement in PRH 5:5.10.

d. The accessibility plan will be reviewed and updated annually by June 30th (see Exhibit 5-2).

e. The safety and facilities maintenance staff should play a primary role in completing the plan with support from managers in all areas.

Strategy:

- This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:

R9. Staff Training
Centers will provide disability-related staff training in accordance with Chapter 5, Exhibit 5-4 (Required Staff Training).

Additional guidance and tools for meeting all Disability Program requirements are available on the Job Corps Disability website.

QUALITY INDICATORS
Q1. Students are able to identify and access appropriate disability-related supports and/or services to meet individual needs.

Strategy:
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Rationale for Rating:

Q2. Students are able to explain their accommodation needs and self-advocate for needed supports.

Strategy:
➢ This area is assessed by the accommodation support contactor using their ROCA tools.

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Rationale for Rating:

Q3. Accommodation plans demonstrate employability readiness by featuring accommodations that foster student independence.

Strategy:
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Rationale for Rating:

Q4. Staff members are aware of Disability Program requirements and their individual role in supporting students with disabilities.

Strategy:
➢ This area is assessed by the accommodation support contactor using their ROCA tools.

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Administrative support is exclusively a Job Corps center function. Below is a sample matrix for use on Job Corps center assessments.

### Sample Consolidated Rating Matrix

**Management**

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**Program Compliance Rating**

6.1 Student Attendance, Leave, and Absences
6.2 Student Allowances and Allotments
6.3 Student Records Management
6.4 Student Enrollments, Transfers, and Separations
6.5 Student Clothing
6.6 Student Transportation
6.7 Food Service
6.8 Student Civil Rights, Including Religious Rights, and Legal Services
6.9 Student Support Services
6.10 Student Health Services
6.11 Related Health Programs
6.12 Health Administration
6.13 Child Care Arrangements
6.14 Disability Program

**Average Compliance Rating**

**Program Quality Rating**

6.1 Student Attendance, Leave, and Absences
6.2 Student Allowances and Allotments
6.3 Student Records Management
6.4 Student Enrollments, Transfers, and Separations
6.5 Student Clothing
6.6 Student Transportation
6.7 Food Service
6.8 Student Civil Rights, Including Religious Rights, and Legal Services
6.9 Student Support Services
6.10 Student Health Services
6.11 Related Health Programs
6.12 Health Administration
6.13 Child Care Arrangements
6.14 Disability Program

**Average Quality Rating**
REGIONAL OFFICE QUALITY ASSESSMENT MODEL

The quality assessment process described below provides a model for a typical one-week Regional Office center quality assessment. This model can be adapted for quality assessments of outreach and admissions and career transition services operators. The formal assessment of the program by the Regional Office verifies program requirements (integrity items), assesses services being provided and student results and behaviors, and uses the quality rating system to produce the quality rating for operations. The model includes nine components:

- **Regular self assessment** by operators contributes to the goal of continuous quality improvement. Operators frequently assess the outcome measurement system outcomes and may want to assess the PRH requirements on a monthly basis to be certain that all documentation is maintained. Quarterly assessments of quality indicators will position operators for continuous improvement and enhance participation in the Regional Office quality assessment process. Results of self assessment may be provided to the Regional Office as part of the quality assessment process.

- Prior to a scheduled RO quality assessment, operators and Regional Offices conduct a **pre-onsite analysis** to determine the current status of operations as evidenced by outcome management reports, project manager monitoring reports, center self-assessment results, and other available information. Operators may be asked to conduct a special self assessment in preparation for the arrival of the assessment team. The pre-onsite analysis helps determine the region’s priorities for the assessment, the composition of the assessment team, and team member assignments. The pre-onsite analysis and resulting identification of issues provides background for the onsite assessment.

Pre-onsite activities include, but are not limited to:

- Gathering and analyzing available reports and data
- Identifying any areas of operation needing special attention
- Determining the strategy and focus of the assessment
- Assembling the team needed for the assessment
- Assigning team members their respective sections of the assessment
- Preparing approach, schedule, and techniques by individual team members
- Arranging logistics
- Sharing results of pre-onsite analysis and assessment plans with the center

August 2008
The pre-onsite process provides a detailed picture of the performance of the center and a projection of possible problems. This information, gathered from the sources listed below, is shared among team members.

- Outcome measures report
- Summary of student satisfaction survey
- Summary of significant incidents
- Report of complaints, congressional inquiries
- Report of strengths and weaknesses by department

Exhibit 1 summarizes documents that many be reviewed during this step.

Each team member’s preparation for the onsite visit involves careful review of the quality indicators applicable to his/her portion of the assessment. Team members prepare interview questions for staff, students, and community leaders. They decide what documentation needs to be reviewed and what aspects of center life need to be observed to glean the information needed to determine the level of quality on center when compared with the quality indicators and QRS definition.

Each team member may find it helpful to arrange interview questions according to the type of interviewee (e.g., staff, student, community leader). Therefore, all questions for students, staff, and community members should be arranged together into one interview event to provide efficiency when interviewing. If a question applies to more than one area, it can be annotated and shared with other team members.

Coordination among team members helps the team determine their approach and techniques for information gathering onsite. Structuring and coordinating schedules, sharing interview and focus group questions, and determining documentation examination needs among team members before arrival on center also helps solidify goals.

- A notice to contractor or operator and center provides the time of the assessment, the names of the team members, any actions that might need to be taken, and the team assignments.

- The regional team selects the brief-in option that best conveys the message the assessment team wants to send. NOTE: The decisions made during pre-onsite activities should be considered in making this selection. The brief-in may be formal upon arrival at the center or may be an informal discussion with the center director, senior management, and/or the operator. The discussion might include information resulting from the pre-onsite analysis; the strategies to be used; the QRS regional weights, if appropriate; names of team members and their assignments; and scheduling needs during the assessment.
Possible options include:

Option # 1 The team leader, center director, and management staff review the pre-onsite information and discuss the focus of the assessment during a conference call. Corporate staff may or may not participate. Center management shares the information with staff and students. No formal brief in is scheduled.

Option # 2 The team leader requests that the operator prepare a report on their most recent self assessment. This report forms the main topic of the brief-in. Clarifications are raised as needed. Assessment team members and center/operator management are present. Student government officials report on their part in the assessment.

Option # 3 A formal brief-in is scheduled. The assessment team and center management and staff meet when the team arrives on center. Introductions are made, the center points out highlights of the year, and the team discusses the priorities and methodology for the assessment.

• **Onsite information gathering and examination** of the issues identified during the pre-onsite analysis occur through interviews with students, staff, local community connections, and employers; the review of center documents; and team observations. Based on the data obtained, team members document results of the assessment and determine highlights and priorities for continuous improvement.

A formal facility tour is optional. However, a number of assessment tasks can be accomplished during a tour. The team should decide how best to accomplish the tour; some teams may decide to have only a few members take a formal tour, others may want to have the entire team participate. Some team leaders have members begin the tour as soon as they arrive. Each member walks around observing safety concerns, trash and litter pick up, and appearance of halls, classrooms, trade areas, cafeteria, recreation areas, and dorms.

Team members can assist one another by noting safety concerns, graffiti, needed repairs, staff and student behavior, appearance and content of bulletin boards, interaction between and among students, and level of conversation and noise.

The baseline for these observations is the conduct of the work environment: team members should expect to see an environment reflecting the appropriate behavior for business. Keep in mind that employers visit the facility; what you see, they will see.
Various techniques are used in the information gathering process. Interviews, focus groups, observations, and document reviews help the assessment team focus on services provided to students. Every assessment team must check that certain PRH requirements are being fulfilled, regardless of the focus of the assessment or whether performance expectations are being met. A list of these mandatory requirements is provided in Appendix C.

Generally, when an assessor is looking at documents or conducting interviews or focus groups, a 10 percent sample provides enough information for assessment purposes. The reviewer must be careful to seek balance in the approach. For example, one record with missing data is not an indicator of lack of compliance or quality, just as the interview of one disgruntled staff member or student is not an indicator of poor management. Teams may want to organize their approach a little differently and make the selection of the sample group from the student roster at the very beginning of the week. Comprehensive team discussions during the assessment week help clarify relevance of data and provide balance in interpretation of diverse team observations.

Interviews with students and observations of demonstrated skills form a large part of the assessment. Having students demonstrate work skills in trade areas, therefore, should occur during the regularly scheduled training day; focus groups, however, can take place after the training day or in the early evening. Team members holding interviews and focus groups during the training day need to be aware of attendance policies and follow appropriate procedures. A combination of areas can be discussed and addressed by one focus group if the selection of the focus group members is handled carefully and topics and questions are planned in advance.

Interviews with community leaders and employers should be planned carefully. It is courteous to limit visits or calls to one per community member. Information gathered can then be shared as needed with other team members. The team member should call and request a specific time that will be convenient when the person is not likely to be interrupted or rushed. Sample interview scripts are contained in Appendix B, Tools and Tips.

- **A brief-out**, feedback of the results of the onsite assessment, occurs in a format determined by the assessment team. Options include discussions or meetings with corporate staff, senior staff, all staff, or only with the center director and corporate representatives. The objective is to create an environment where needed improvements can be clarified and a priority attached to them.

In any of the options, the team, the operator, and the center should share a common understanding of highlights and areas in need of improvement, with some priority assigned. The team may choose to share their conclusion as to whether the center is meeting or not meeting expectations. If conclusions are
shared at the brief-out, these should be reflected in the subsequent written report. Some tips for conducting an effective brief out are provided in Appendix B, Tools and Tips.

- **A formal report** provides written feedback to the operator, the center, and the National Office of Job Corps. The report outlines the assessment results and the quality rating.

Following a RO quality assessment, a report is prepared reflecting the results of the assessment. In preparing the report, the assessment results must be presented in a logical manner that accurately relates the methodology used for the assessment, identifies areas needing improvement, assigns priority for corrective actions, and includes the quality matrix with final ratings for each function and an overall rating.

The audience for the report is the RO, the contractor, and the Job Corps National Office. The report provides the current quality rating for the contractor. The National Office retains RO quality assessment reports to provide responses to oversight groups when requested. ROs and contractors use reports to monitor continuous improvement and provide historical data regarding operations.

The report, signed by the Regional Director, is submitted to the contractor and the Job Corps National Office no later than 30 days after the assessment. The National Office ensures that the quality rating is transmitted to the Job Corps data center for inclusion in data system reports. The contractor/center prepares a corrective action plan in response to identified areas needing improvement within 30 days after receipt of the report.

The following format will be used by ROs to report assessment results to the National Office. Each narrative report must include at a minimum:

- **Executive Summary.** This should serve as an overall snapshot of the assessment team’s view of the center. It should be short, concise and should be able to stand alone as a short summary of the review in order to be provided as a response to an information request. The summary could include information gleaned through the pre-onsite analysis. However, the summary should include at a minimum:

  1. Purpose of the assessment: regular, special, by whom, and the outcome of the last assessment
  2. History of the center: location, characteristics
  3. The assessment team: assignment and composition
  4. General assessment of the center for the six areas of the PRH/PAG
5. The quality rating matrix for these six areas of the PRH (page 5 of 9 of current PAG).

- **Quality Rating**: The overall final score determined by the regional assessment team and the formal score need to be forwarded in writing to the National Office and sent to the Job Corps Data Center for inclusion in the QMS.

- **Quality Rating Narrative**: Presents the documentation for the overall rating. This narrative is internal, pre-decisional documentation and must be provided for acceptable and unacceptable quality ratings.

Regional Offices have the discretion, in their full report, to include any other information (safety, health reviews, project manager checklists, staff/student surveys, etc.) and design their own format for the documentation of the operator’s performance; however, the National Office of Job Corps requires only the **electronic** submission of the three bulleted items above: the executive summary, the overall QR score, and the rationale behind that score. The Regional Office is expected to maintain a copy of the full report for at least 5 years, in the event that a request is made for additional information.

- A **corrective action plan** is issued by the operator outlining specific corrective actions to be taken in response to needed improvements, monitoring dates, and follow-up actions.

- **Regular follow up and monitoring** are to be provided by the operator, the Regional Office, and the management team. Quarterly assessments continue to focus on needed improvements and on any corrective actions being implemented. Modification of the quality rating may result from follow-up Regional Office monitoring when significant changes occur between Regional Office quality assessments as described in the Preamble.
**EXHIBIT 1**

**PRE-ONSITE ANALYSIS MEETING DOCUMENT REVIEW**

(OA/CTS Assessments would use the appropriate reports for their function.)

<table>
<thead>
<tr>
<th>DOCUMENT (most recent and prior)</th>
<th>Outcome Met = M Concern = C</th>
<th>USE</th>
</tr>
</thead>
<tbody>
<tr>
<td>OMS10</td>
<td></td>
<td>Center performance outcomes</td>
</tr>
<tr>
<td>POMS10</td>
<td></td>
<td>Placement performance outcomes</td>
</tr>
<tr>
<td>VES 10/20</td>
<td></td>
<td>Vocational training performance</td>
</tr>
<tr>
<td>JCSSS</td>
<td></td>
<td>Quality indicators regarding academic, behavior management, counseling, food service, health, residential living, vocational training</td>
</tr>
<tr>
<td>OMSOA10</td>
<td></td>
<td>Outreach and admission outcomes</td>
</tr>
<tr>
<td>MPO30, 31</td>
<td></td>
<td>Student outcomes</td>
</tr>
<tr>
<td>PL600</td>
<td></td>
<td>Student outcomes</td>
</tr>
<tr>
<td>Separation Breakdown</td>
<td></td>
<td>Outreach and admission outcomes; problem identification</td>
</tr>
<tr>
<td>2110 and 2110S (prior three reports)</td>
<td></td>
<td>Financial management; vacancies</td>
</tr>
<tr>
<td>DOL Quality Assessment and Action Plan</td>
<td></td>
<td>Identify priorities; establish focus of assessment</td>
</tr>
<tr>
<td>Operator Assessment and Action Plan</td>
<td></td>
<td>Identify priorities; establish focus of assessment</td>
</tr>
<tr>
<td>Proposal Implementation</td>
<td></td>
<td>Identify areas to check to see if DOL is getting what it paid for</td>
</tr>
<tr>
<td>Monitoring Trip Reports</td>
<td></td>
<td>Identify areas of success and in need of improvement</td>
</tr>
<tr>
<td>Health Consultant Report</td>
<td></td>
<td>Identify issues for improvement</td>
</tr>
<tr>
<td>SIRs</td>
<td></td>
<td>Management and follow up</td>
</tr>
<tr>
<td>OASAM Safety Inspection</td>
<td></td>
<td>Follow up for abatement plans</td>
</tr>
<tr>
<td>Congressional Inquiries</td>
<td></td>
<td>Resolution</td>
</tr>
<tr>
<td>News Articles</td>
<td></td>
<td>Provide positive or negative news in the community about the center, students, or staff</td>
</tr>
<tr>
<td>Community Relations Council Meeting Minutes</td>
<td></td>
<td>Provide information regarding CRC activities and how activities relate to the center and community</td>
</tr>
<tr>
<td>OIG Reports</td>
<td></td>
<td>Follow up</td>
</tr>
</tbody>
</table>

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PROGRAM ASSESSMENT GUIDE

APPENDIX B:
Tools and Tips
August 2008
TOOLS AND TIPS

This appendix provides quality assessment team members with techniques and tips that can be applied before, during, and after the assessment. It begins with a “how to” series that describes methods to maximize review efficiency (such as how to get the most out of an interview). The appendix also highlights the ethical standards that should be followed by team members during the assessment and sample interview scripts that can be adapted to a variety of settings.

1 How To Series

1.1 How To . . . Improve Communication

In order for centers, center operators, OA/CTS contractors, and Regional Offices to enhance the assessment process, communication should be open rather than closed during the process of gathering data, searching for the source of problems, or exploring solutions.

Closed communication occurs when either yes/no or leading questions are asked.

- **Yes/no questions**
  
  Do the staff and students at this center believe this is a quality center?

  Is the food good at this center?

  Are students provided the services that are required by the PRH?

- **Leading questions**
  
  The staff and students believe this is a quality center, don't they?

  The food is pretty bad, isn't it?

  The services guaranteed by the PRH are being provided, aren't they?

Open-ended questions begin with what, who, why, where, when, and how. The expression "tell me more" is another method for opening the communication process. Assessment team members should use open-ended questions when conducting interviews with staff and students during the onsite assessment process. Sample open-ended questions include:

- Which services would staff and students identify as being quality services at this center?
• How would you describe the food at this center?

• Which services are being provided to students and which services are not? What is the best thing about the center? What would you change?

1.2 How To . . . Conduct an Interview

Substantial information regarding the quality of programs and services can often be gained by conducting interviews with staff and students. With proper planning, interviews can yield the exact information needed.

1. Plan your questions based on your assigned functional area.

2. Introduce yourself to the person you want to interview.

3. Ask permission to interview. Some people will be comfortable; others will ask not to be interviewed.

4. Respect the answer. Remember some people may feel insecure, feel too new to the center, or may prefer privacy.

5. Set a time for the interview. Be on time for the interview.

6. Find a quiet place where interruptions and noise are at a minimum.

7. Ask open-ended questions. “Tell me about the food” is open ended and will get a more personal answer than “Is the food bad?”

8. Ask clarifying questions or repeat statements to be certain you understand what the person is communicating.

9. Take notes. Thorough notes are valuable later in the process when you are discussing your information with other team members, consolidating your interview data with other sources of information, and writing your part of the report.

10. Close the interview with a thank you.

11. Test the validity of your information and follow up any incomplete data using other sources.
1.3 How To . . . Observe the Facility

Observations take time, energy, and an incredible amount of concentration. Seeing is only one part, listening is important, too. Watching quietly no matter where you go on the center will give you confirming data for requirements and indicators of the degree of quality of services.

Watch for the following:

**Signs of abuse rather than use**—Graffiti, scarred desks, broken windows, trash under bushes, no one picking up paper as they go down the halls.

**Staff comfort rather than student needs**—Offices with coffee pots, microwaves, very nice furniture, and rugs, while dormitories have old furniture, no refrigerators or microwaves, no rugs, no lamps, and no plants. Staff bathrooms that are cleaned; student bathrooms that are not. Staff lounges that are better equipped than student lounges.

**Signs that regular cleaning takes place**—Wax build up along halls and dorms’ floors that shine; windows that have been cleaned; bathrooms that are refreshed during the day; general pickup midmorning, after lunch, and mid afternoon. Trash cans emptied, ashtrays emptied. No standing water from mops that have not been wrung out.

**Signs that regular maintenance takes place**—Light bulbs are working, fan ducts are clean, cracks in pavement are repaired; holes in walls are repaired; faucets are not leaking; broken furniture is removed from classrooms, dorms, offices, or outside of buildings; window blinds are working; curtain hooks and rods are in place; screens are in windows and doors; door stoppers are working; and squeaks are at a minimum.

**Signs of pride**—Bulletin boards reflect an active community, the outside areas are landscaped and well kept, and the cafeteria is pleasing to the eye, ears, and nose. Staff and students show off their areas. VST projects are well marked. The buildings send a message that caring professionals and young adults work and live there.

1.4 How To . . . Observe Staff Modeling

The work environment should be safe and should reflect the mission and values of the organization. Young people learn how to conduct themselves by observing staff and they learn work behaviors from center staff. Observe very carefully to be sure the students are exposed to positive behavior.

**LISTEN** to how people are talking with one another. Do the staff members know the names of the students? Do staff members exchange greetings as they move through the halls? What kind of language do you hear? What is the noise level? Do the staff members talk louder than students? Is the level appropriate for where you are observing? Listen to how the staff addresses students and students address staff.
**LOOK** at how the staff is dressed. Is the dress appropriate for the area you are reviewing? Are uniforms clean and pressed? Shirt tails tucked in? Are the staff members wearing appropriate and required personal safety items? Look at the offices, classrooms, dorms, and shops. Are they clean, orderly, professional, and organized? Does the area reflect workplace standards? Is the staff diverse?

**REVIEW** staff time sheets and time cards. Are they on time? Are they arriving in time to be fully prepared for students? Look at the start of meetings, classes, appointments, social skills, ball games, and movies. Do these events generally start and finish on time? Are managers waiting for late comers? Are vocational instructors helping students learn to begin work right away or is there a lot of standing around before the job gets started? Review the tardy procedure for students. Are clusters of staff seen outside classrooms or trades while students are inside? Where are staff members taking smoke breaks?

**OBSERVE** staff spending time with each other, with individual students, and with groups of students. Is the interaction professional? Observe where the staff members meet one another. Parking lot meetings are not always positive signs of communication.

### 1.5 How To . . . Observe the Cafeteria

The cafeteria, as with other departments, fills many needs; the physical need for food, the need for companionship, and meeting friends are all part of the setting. Equally important, the cafeteria is a place to learn. Students learn about different foods, different people, how to behave at a banquet, how to dress for meals, what to use on a fully set table, and better manners.

**OBSERVE** special event calendars, food service meetings, table arrangements, how students act in line, how the students talk with the staff, their manners, their dress, their clean-up routine. Equally important is how the staff talks with students. Do they greet them at all? Do they ask what they want? Is the exchange pleasant? How is the food presented? Is the meal colorful? A one-color meal usually indicates the use of processed foods and a lack of variety. Is the salad bar kept clean and replenished often? Is there a dessert? Are the drink machines cleaned? Are napkins on the table?

**WATCH FOR** regular cleaning during the meals, enough food for seconds, hot food at the end of the meal, condiments on tables, variety at the meal, staff eating in the cafeteria, good lighting, menu posting, and students cleaning up. Are staff monitors helping out? Are staff members signing in for meals with meal tickets? Where do students sit? Are they comfortable joining staff members?

**LISTEN TO** language, noise level, teasing, yelling, and cursing. Watch for behavior that will be acceptable in the workplace. Is anyone addressing inappropriate behavior?
1.6 How To . . . Conduct a Record Review

Conducting a thorough review of records is critical in order to verify outcomes and compliance requirements. Remember that how records are kept is a sign of quality.

1. Ask for the operating procedure that defines how information is to be kept in the folders. It will tell you where to look for information within the folders.

2. Review a 10% sample of student records to get reasonable information regarding trends.

3. Use the same student sample as all other reviewers to gain a more complete picture.

4. Organize your recording format according to the standard operating procedure.

5. Record as you review. You will be able to determine patterns as they emerge.

6. Keep the following questions in mind. Is the center recording as it says it will in the operating procedure? Is the recording done on a timely basis? Is the record in sequence? Does it have all the required signatures? Does it meet the requirements for compliance?

7. Compare information if you are reviewing with others. For example, behavioral information should be addressed in center standards, in social development, and in counseling.

8. Write notes regarding the conclusions you reach from reviewing records. Verify your conclusions with others. Make certain information is not kept in some other place.

9. Include the recording format with your report. It helps the center to examine the folder and see what you saw.

10. Determine the quality rating for the folders. It will help you as you rate the overall quality of the department.

11. Call and let the manager know when you have completed your review so the folders can be returned to the department.

1.7 How To . . . Observe a Classroom

1. Check with the Regional Office program manager during the pre-onsite meeting regarding programs in place and review the center’s plan to determine whether any new programs are proposed.

2. Select one or two classrooms to observe.
3. Watch for the following in observing the class:

**Teacher-student interaction:** Are students involved in their work? Where appropriate, are students involved in small group discussions or teams? Is the teacher modeling appropriate employability behavior? Are students able to listen to one another without interrupting?

**Environment:** Does the classroom reflect quality? Are materials marked so they can be easily retrieved? Are the decorations age- and subject-appropriate? Is the room clean? Is graffiti evident on desktops or tables? Are students dressed for employment? Are computers evident and are they in use? Are there signs that students are being recognized for accomplishments? If so, is the material up to date? Is employment reflected in posters or other signs?

**Employability:** During your observation period, what employability skills have been reinforced? Has any connection been made between the subject materials and vocational training? Did students have the opportunity to demonstrate any workplace communication skills?

4. Join with another team member and conduct a focus group or individual interviews to determine the amount of emphasis placed on career development, workplace communication skills, and school to work.

5. Observe the entire area for emphasis on employability. List everything you can see or hear that reflects the development and demonstration of employability and workplace communication skills.

### 1.8 How To . . . Observe an Employer Work Site

1. Become familiar with all safety regulations.

2. Use the interview scripts (see Section 3) to guide the conversation.

3. Determine what tasks the student should be completing and observe his/her work, if possible.

4. Check to see if the student is dressed appropriately. Is he/she dressed like the other employees?

5. See if the student interacts with other employees. Is the interaction appropriate?

6. Determine the method used to provide feedback to the center and to the student.

7. Try to determine what challenges the employer faces in providing support to the students.

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1.9 **How To . . . Conduct a Focus Group**

A focus group is an interview with a small group of people (usually six to 12 participants) on a specific topic. The intent of the focus group is to *learn from others*—what does the world look like from their perspective? The focus group usually lasts from 30 minutes to 2 hours.

The objective of a focus group is to get high-quality data in a social setting where people can share their own views in the context of the views of others:

- It is not necessary for the group to reach consensus
- It is not necessary for the group to disagree
- It is not necessary for the interviewer to have an opinion, to clarify information, or to make statements that will influence the information

In conducting focus groups:

- Be especially sensitive to language and how that language may affect another’s norms or values. Words are data and it is difficult to know what meaning they hold for people (in similar or different cultures).
- Ask open-ended questions in a conversational manner. Be thoroughly familiar with your questions; you do not have to memorize them but they should be carefully phrased and appropriately sequenced. If participants do not understand the question, be prepared to switch quickly to a parallel question that has the same meaning. Modify the sequence of the question or even eliminate a question if it has been answered in a previous discussion.
- Be clear; effective questions are clear, brief, and reasonable.
- Introduce the focus group by welcoming participants, providing an overview (why they have been invited), describing focus group ground rules, and presenting the opening question. A sample introduction is presented below:

*Good morning, and welcome to our session. Thank you for taking the time to join our discussion on cafeteria food. My name is Jane Smith, and I represent the XYZ corporate office. Assisting me is Harry Kane, program manager from Region 3. We want to hear how Job Corps students feel about the food served in the center cafeteria. We are particularly interested in your views because you have had lots of experience eating in the cafeteria, and we want to tap into those experiences.*

*Today we’ll be discussing your thoughts and opinions about cafeteria food. We basically want to know what you like and don’t like about the food served on center and what might be done to improve your experiences. There are no wrong answers but rather differing points of view. Please feel free to share your point of view even if it differs from what others. Keep in mind that we’re interested in all your comments, both positive and negative. All your opinions are valuable.*
Before we begin, let me suggest some things that will make our discussion more productive. Please speak up—only one person should talk at a time. All information you share with us today will be kept confidential.

My role here is to ask questions and listen. I won’t participate in the conversation, but I want you to feel free to talk with one another. I’ll be asking about a dozen questions, and I’ll move the discussion from one question to the next. Some people in these discussions tend to talk a lot and some people not to say much. But it is important for us to hear from each of you because you have different experiences. So, if one of you is sharing a lot, I may ask you to let others talk. And if you aren’t saying much, I may ask for your opinion. We’ve placed name cards on the table in front of you to help us remember each other’s names.

Let’s begin. Let’s find out some more about each other by going around the table. Tell us your favorite meal and what makes it your favorite. Nancy, let’s start with you.

- Anticipate the conversation flow. Group discussions are unpredictable and you should anticipate the various directions the discussion may take and be able to recognize beneficial topics of discussion as opposed to dead ends. To avoid detours:
  - Anticipate situations
  - Know the boundaries
  - Communicate the boundaries
  - Interrupt when needed
  - Refocus the discussion

- Control your reactions. Watch both your verbal and nonverbal reactions.

- Probe as needed. In most conversations there is a tendency for people to make vague comments that could have multiple meanings. When this occurs, additional probing is necessary to elicit additional information.
  - “Would you explain further?”
  - “Would you say more?”
  - “Is there anything else?”
  - “Can you give me an example of what you mean?”

- Listen. One of the greatest challenges is to distinguish between people talking and people answering the question. The focus group leader decides when enough has been said about a particular question. Several factors enter into this decision—the type of question, the question’s importance, whether participants have more to say, and the time remaining.
• Organize your notes. Consider standardizing the focus group reporting format so that everyone on your team who conducts groups uses the same approach. An example is shown below.

Information about the focus group:

<table>
<thead>
<tr>
<th>Date of Focus Group</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Location of Focus Group</td>
<td></td>
</tr>
<tr>
<td>Number and Description of Participants</td>
<td></td>
</tr>
<tr>
<td>Moderator Name</td>
<td></td>
</tr>
<tr>
<td>Assistant Moderator Name (if appropriate)</td>
<td></td>
</tr>
</tbody>
</table>

Responses to questions:

Sample Q1. When you hear the term *customer service*, what comes to mind?

<table>
<thead>
<tr>
<th>Brief Summary/Key Points</th>
<th>Notable Quotes</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comments/Observations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

• Summarize the discussion. Spend a couple minutes at the end summarizing the main points. When the summary is completed, ask for comments from the group.

• Thank participants and explain how the information will be used.

• Keep the analysis simple. Here are some suggestions for deciding what to report:
  
  ➢ Look for common themes.
Look for repeatedly voiced attitudes or opinions and then try to identify the dissenting opinions.

Be on the alert for the single response that seems worthy of note. Occasionally these responses identify a critical problem or important opportunity.

Always listen for what you do not hear.

When in doubt about whether to include something, go back to the purpose of the group—does the information contribute to the accomplishment of these objectives?

Illustrate points using quotes from participants.

1.10 How To . . . Conduct a Brief Out

An effective brief-out provides the operator/contractor and the center with verbal feedback on results of the Regional Office quality assessment. The brief-out generally occurs prior to the departure of the team. It could also occur in a conference call after the assessment. NOTE: The assumptions and techniques given below for an effective brief-out can also be applied to writing the report.

Following are some basic assumptions to keep in mind when planning and presenting the verbal feedback:

- Center/contractor staff and evaluators share a common interest in producing positive results for students.
- The center/contractor staff members want to do a good job.
- If center personnel understand why a rule, policy or regulation exists, they will try to achieve it.
- If the staff understands the information that led to a conclusion, they will see it as reasonable.
- If the team can support conclusions with facts, evidence, or observation, they will be perceived as more objective.
- Evaluators generally find it difficult to give bad news to those being assessed. An assessment can be more effective if related to results for students; everyone’s shared interest.

Some suggestions for delivering an effective brief-out:

- Set the scene: There may be a different audience than that present at the brief-in (e.g., corporate staff). Repeat pertinent information, even if redundant with the brief-in if it seems appropriate.
Tell the audience how information was gathered during the process, i.e. interview, observation, records review, etc. Tell them how many students were interviewed, focus groups were conducted, etc., to give credibility to the conclusions that are drawn.

Realize that the quality rating is a qualitative measure and, by definition, more subjective than a quantitative measure such as the OMS. Support conclusions with facts.

Quantify whenever possible to give context and relevance to a conclusion. For example, “The team interviewed 25 students. Only four could describe their employment goals.”

Identify the problem or situation rather than merely giving a recommendation. Staff members are more likely to change if they are aware of the reason and can identify what is wrong.

Explain why the problem matters. If at all possible, relate the problem to students, their outcomes, learning, experience, or satisfaction. Make it real to the audience.

Relate supporting statistics to students. For example, 48 percent of students leave the center as AWOL or DID.

Take care not to generalize one incident, event, or comment to the whole population or operation. Put the event in context. For example, one particularly vocal student’s dissatisfaction with food service should not be generalized to represent the whole student body.

Consider using visual aids to highlight important points. Newsprint or overheads are useful and might help visual learners focus on your points.

Emphasize that the quality rating scores are team consensus, not an individual evaluator’s opinion. Don’t use phrases such as “I gave you a score of x on Chapter 2.”

If the team does not provide a quality rating at the brief-out, tell staff at the brief-in so that they will not be disappointed.

Choose wording carefully. Watch out for contradictory statements; for example, “You’re doing a great job managing center operations; you scored a 4 on Chapter 5.”

Use verbal cues to highlight important points. “Here are three key items for you to work on: 1)... 2)... 3)...”

Remember to summarize, emphasize systemic issues, and give only salient, illustrative examples.

Be accountable for being part of the change process for program assessments. Work in partnership to give and accept feedback on the process.

1.11 How To . . . Write a Report

The assessment report provides a snapshot of the week of the assessment. It documents the processes and findings discovered during the onsite visit. Many of the elements of an effective brief-out listed in the previous section may also be applied when writing the report.
Evaluators may benefit from the following hints.

- Take notes during the assessment.
- Use an active voice. For example, "The cafeteria is clean and well kept."
- Write short sentences.
- Use clear and simple language to convey your observations.

"Three of four focus groups on safety reported feeling very safe in their rooms, safe in the dorms, and safe in recreation areas. One focus group (men's dorm #3) reported feeling safe in their rooms but not in the dorm in general. Focus group students report having towels snapped at them in the bathroom. Focus group students report frequent shoving occurs as they walk through the halls. Some older students have claimed the blue and green seats on the left, nearest the TV, and they make others get out of the seats when they want to watch certain shows."

- Delete words, sentences, and phrases that do not add to your meaning.

“Three of four focus groups on safety reported feeling very safe in their rooms, safe in the dorms, and safe in recreation areas. One focus group (men's dorm #3) reported feeling safe in their rooms but not in the dorm in general. Focus group students report having towels snapped at them in the bathroom. Frequent shoving occurs as they walk through the halls. Some older students have claimed the seats nearest the TV. If newer students are seated there, they are told to get up and move."

- Use specific and concrete terms.

“The center is commended for improvements in the business occupation classroom. The carpeting, mahogany computer desks, office chairs, covered wiring, and new computers create the impression of a small business office. Student behavior is measurably improved. Accountability for equipment is limited to the two users of each desk. Students interviewed report improved concentration and more rapid completion of the TAR items as a result of the improvements.”

“The culinary arts area is unsafe. The initial inspection revealed open boxes of flour, cookie mix, beans, and milk powder. Grease traps are clogged, the stove and vents are dirty, and the serving counter is stained with old food. A review of the health inspection revealed continual low ratings for the same issues. The past three VST plans have included a renovation plan. Each year the project has been removed from the plan. The team leader, program manager, and Center Director agreed to close the shop until corrections can be made.”

“The expected outcome of the closure is a complete renovation of the area using available VST funds. A renovation plan is due to the program manager in 2 weeks. Classes will
continue using the cafeteria as the classroom. Hands-on training will take place in the kitchen when possible. Once the renovation is completed, only high ratings from the outside health inspection will be acceptable.”

- Be on time with your report.

1.12 How To . . . Provide Follow-Up

Follow up provided by the operator and program manager ensures continued improvement. At times, however, the action taken fails to achieve the expected outcome. Early discovery and intervention helps the center/contractor focus on resolution. The expected outcomes of each review should be confirmed. As the program manager prepares for a monitoring visit, he/she selects certain items from the operator/contractor assessment response. Concerns given a high priority should be selected first.

A partnership with the operator/contractor may be the most efficient way to accomplish follow up. Routine visits by the operator and program manager would provide continued follow up throughout the year. The assessment response indicates the actions the center/contractor will take to achieve the improvements; using that document as the baseline, the center/contractor and the program manager can note when the action has been observed and confirmed. Adding a few lines to the operator’s response would allow it to be used efficiently by each party.

Sample: This box could be added after each corrective action. As the action is reviewed, the box grows with documentation of those who have affirmed that the action is having the intended outcome.

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2 Ethical Behavior

The standard of expectation set by team members when onsite, at a Job Corps center or with an OA/CTS contractor for the purpose of assessing the program services provided, must focus on quality. Assessment team members should be selected not only for their experience and knowledge of Job Corps, but for their ability to collect and analyze data and to bring a well-informed and objective point of view to the evaluative process.

When visiting a Job Corps center or the site of OA/CTS operations, consider the following:

- Arrive at the center or contractor site with a positive and supportive attitude and a focus on the purpose/goal of the assessment.
• Be mindful of and sensitive to the impression created by your own behavior. Inappropriate behavior can have an impact on the morale of staff and students.

• Avoid any act or comment that could be construed as judgmental or that might convey a lack of interest or objectivity.

• Be aware of the center’s daily schedule of classes and activities when scheduling interviews to minimize disruptions to the training day.

• Plan interviews in advance as much as possible so that instructors and staff can arrange for substitute coverage, if necessary.

• Be on time for scheduled interviews; take time to make a courtesy call if you will be late.

• Keep in mind the tone you set for any discussions or interviews so there is a sense of trust, fair play, sensitivity, and openness. Questions should be phrased so as not to be accusatory or derogatory, but focused on information gathering from an objective point of view.

• Treat everyone equally; the appearance of favorites is destructive to morale.

• Consider the implications very carefully before participating in any social activities with center personnel, as staff may not feel free to decline such invitations. Generally, such activities are not a good idea.

• Avoid involvement in center gossip and fraternization with either center staff or students. You are perceived as having power over the contract award and contract renewal decisions. This perceived power creates special circumstances relative to the statutes of harassment and discrimination.

• Pay for all meals that you eat on center.

• Decline any gifts or elaborate refreshments from the contractor or others.

• Alert the team leader immediately to any personal conflicts that arise between team members and center staff.

• Keep intact the confidentiality of your office.

• Keep concerns shared by students and staff confidential, as appropriate.

• As a program evaluator, you can have an effect on contractor operations in a variety of ways, including:
  o Modeling appropriate behavior when onsite.
  o Articulating questions that focus on quality.
  o Questioning contractor staff about their methods and approaches and raising questions about problems that are observed.
  o Offering positive support to students and staff.

3 Interview Scripts

August 2008
Information extrapolated from interviews with individuals representing various organizations in the communities surrounding the Job Corps center provides essential input for program design and improvement. How well the center is able to present a positive image and communicate effectively with its neighbors is key to the future success of its enrollees.

Interviewers meeting with community representatives will need to determine how often the representatives have contact with the Job Corps students and staff and the quality of that contact, so as not to draw hasty conclusions about information received in the interviews. For larger organizations in the community, it would be beneficial to ask the center to provide the name of the organization’s point of contact.

For example, consider the following:

1. How many times has the representative communicated with contractor/center personnel? Once, twice, or a dozen times?
2. Has the employer had only limited contact with the contractor or students or has the employer hired many students over the years? Has the employer been provided an opportunity to participate in a variety of activities related to student learning?
3. Has the neighbor had one bad experience with the center that has biased his/her view? Has the police department only been to the center to deal with negative student behavior?

On the following pages are a series of suggested questions for interviewing various representatives of organizations in the surrounding Job Corps community. Sample interview scripts are included for: neighbor, local law enforcement agency, local fire department, employer, mayor/city official, and community linkage.

3.1 Interview—Neighbor

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Establish comfort level through introductions and an explanation of why you are conducting the interview.

1. How long have you lived near the Job Corps center?
2. Tell me how you feel about having Job Corps in the community.
3. What do you know about the Job Corps program and its mission?
4. What is your impression of the center, the students, the staff?

August 2008
5. Do you know any of the staff or the students? If so, how did you meet? Ask for details.
6. Have you had any communication from the center, either in person or in writing? If so, ask for details.
7. Have you ever been on the Job Corps center? For what purpose? What was your impression?
8. Do you participate in any activities on the center? Describe them. Have you ever been invited to participate in any activities?
9. Would you be interested in visiting the center to learn more about it?
10. Do you have any questions or comments?

3.2 Interview—Local Law Enforcement Agency

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Establish comfort level through introductions and an explanation of why you are conducting the interview.

1. How long have you been employed at this location?
2. Describe what communication you have with the Job Corps center. (There should be a written cooperative agreement) How often do you communicate with the center?
3. Do you have a regular point of contact on center? Is this person accessible? Describe your working relationship.
4. Describe your relationships with students; with staff; with management. What impression do you have of them?
5. Describe recent circumstances when you have visited the center in your official capacity. How often are you called to the center?
6. What is your understanding about the mission of Job Corps?
7. Are you informed about the center's community relations council?

August 2008
8. Have you ever been invited to or participated in center activities other than in your official capacity?
9. Would you change anything in your relationship with the center/students/staff from what it currently is?
10. Do you have any comments or questions?

3.3 Interview—Local Fire Department

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<td>Interviewer</td>
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Establish comfort level through introductions and an explanation of why you are conducting the interview.

1. How long have you been employed at this location?
2. Could you describe events that have required you to visit the Job Corps center recently in your official capacity?
3. What is your impression of the Job Corps center? Of its students? Staff? Management?
4. Do you know what the mission/goal of Job Corps is?
5. Do you have an official point of contact at the center? Could you describe this relationship?
6. Have you or your department received any written or verbal information about the Job Corps center?
7. Have you ever been invited to or participated in events/activities on the center, other than in your official capacity?
8. Have center staff or students visited your department?
9. Do you have any questions or comments?
3.4 Interview—Employer

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Establish comfort level through introductions and provide an explanation of why you are conducting the interview.

1. How long has your organization/company/business had Job Corps students participating in work-based learning opportunities? How many students?
2. How did you learn about Job Corps? Why did you agree to offer work-based learning opportunities for students?
3. Do you have an official point of contact at the center? Is this person accessible when you need to communicate? How responsive is the center?
4. Describe your role in this arrangement. Are you involved in developing the specific training program for the students at your place of business? Are you aware of the specific skills that the students must achieve? Are the students learning new skills? If you are involved in work-based learning, how were employees selected to supervise/mentor the students.
5. How often do center staff members visit your place of business and the students working there?
6. Tell me about how prepared (work ready) the students are in terms of their job skills. Are they poorly prepared, prepared, or well prepared? Do you notice any trends relative to the student's skills?
7. Tell me about the student's work habits and attitudes. Do you find that they are appropriate to the workplace? Are there any trends in the student's behavior?
8. Describe how you evaluate the performance of the students in the workplace.
9. Have there been any problems with students that you needed to resolve? Describe how you dealt with the problems. Have students raised issues about their work? Were they resolved? How?
10. Has your place of business hired any Job Corps graduates? If so, do you find them prepared for the work world? If you have not hired any, would you explain why not?
11. Describe your involvement, if any, with the Job Corps vocational curricula.
12. How often do you visit the center? What is the purpose of your visit?
13. Do you participate in any center activities/events outside of your official capacity? Have you ever been invited to participate in any activities/events?

August 2008
14. What is your overall impression of the Job Corps program? Is there anything you would like to see changed?

15. Do you have any questions or comments?

3.5 Interview—Mayor/City Official

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Establish a comfort level through introductions and provide an explanation of why you are conducting the interview.

1. How did you become aware of the Job Corps center?

2. Could you articulate whether or not you consider the center to be an asset to the community? In what way? If not, what changes would you like to see?

3. Has the center participated in any community projects of which you are aware? What was the center's role? Were students and staff involved?

4. What kinds of communication occur between your office and the center? Whom do you generally communicate with at the center?

5. How would you describe the relationship between your office and the center?

6. Do you know about the center's community relations council? Explain your/your office's role, if any.

7. Do you feel that the center keeps you well informed about events and activities, as appropriate? Have you been invited to or attended any events or activities at the center?

8. What impression do you have of the students at the center? Of the staff? Would you say that the students are welcome in the community?

9. Have students and/or staff visited your office? For what purpose?

10. Is the center treated fairly by the media?

11. Do you have any questions or additional comments?
3.6 Interview—Community Linkage

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<tr>
<td>Interviewer</td>
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Establish comfort level through introductions and provide an explanation of why you are conducting the interview.

1. How did you learn about the Job Corps center?
2. Would you explain how the linkage between your (business, school, college, training facility) and the center occurred? How long has the linkage been in place?
3. How does your organization benefit from this linkage?
4. Describe the communication between your organization and the center. How often is there communication and with whom? Are you satisfied with the level of communication?
5. Do you have a principal contact at the center? Is this person accessible and responsive?
6. What is your impression of the Job Corps program, its students, and staff?
7. Have you attended any events/activities at the center? Have you been invited to attend any?
8. Are you familiar with the center’s community relations council? If so, do you know what role it plays. If you are a member, what role do you play? To your knowledge, do the council's decisions have an impact on the center?
9. Describe what adaptations to either your program or the center's program, if any, have taken place as a result of this linkage.
10. Do you feel the center is preparing its students well for the work world? What would you change, if anything?
11. Do you have any questions or additional comments?
APPENDIX C-1:
Procurement Review Guide
August 2008
Review Guide

The procurement review is conducted to determine the extent to which the contractor’s purchasing system demonstrates and ensures compliance with Government policies and contractual terms by assessing the contractor’s:

- Management oversight of the procurement process;
- Use of price competition to ensure responsible expenditure of funds;
- Compliance with cost accounting standards in awarding subcontracts;
- Actions to provide opportunities for small business participation; and,
- Methods of determining subcontractor responsibility.

Pre-Onsite Preparation

To maximize time spent on center, the evaluator should prepare prior to arrival on-site. Pre-onsite activities should include the following:

1. Determining if the operating contractor has an approved purchasing system. The National Office of Job Corps conducts Contractor Purchasing System Reviews (CPSR) for Job Corps’ operating contractors. Such reviews are conducted at the contractor level, not for individual contracts. If a contractor has a purchasing system that is approved by Job Corps, the approval applies to each of its individual Job Corps contracts.

   E-mailing Lisa Taylor at taylor.lisa@dol.gov if a CPSR has been conducted, to see if the contractor’s system was approved or not. You will need to know this as requirements for Contracting Officer Consent to subcontract differ for contractors with approved purchasing systems as follows:

   **Contractors without approved purchasing systems**

   Consent to subcontract is required as follows:

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<tr>
<th>Subcontract Type</th>
<th>&lt;$25,000</th>
<th>&gt;$25,000</th>
<th>$100,000 +</th>
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<td>Cost Reimbursable</td>
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<td>Consultants</td>
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<td>Labor Hour</td>
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<td>Time &amp; Material</td>
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<td>Fixed Price Supply or Services</td>
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<td>Contracting Officer</td>
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Contractors with approved purchasing systems

Consent to subcontract is required as follows:

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<th>Subcontract Type</th>
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<td>Consultants</td>
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<td>Not Required</td>
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<td>Labor Hour</td>
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<td>Time &amp; Material</td>
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<tr>
<td>Other subcontracts as specified by the Contracting Officer</td>
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Although approval is not required, the contractor must notify the Contracting Officer prior to award with the following:

- Any cost-plus-fixed-fee subcontract; or
- Any fixed-price subcontract that exceeds either the simplified acquisition threshold or 5 percent of the total estimated cost of the contract.

2. Obtain and review center Standard Operating Procedures and policies for purchasing/procurement to determine:

- If policies have been approved by the Contracting Officer in accordance with contractual requirements.
- The staff or managers that have signature authority to authorize and approve purchases at each dollar threshold.
- If the policies include internal controls including separation of duties, i.e. different individuals have authority for the preparation of purchase orders, conducting the purchase, receiving goods, and the payment of invoices.

3. Identify the period to be covered by the assessment, i.e. prior 1-year period.

4. Request a copy of the purchase log for all center purchases in the following categories for the period to be reviewed, i.e., prior 1-year period. If the contractor does not organize the purchase log by dollar threshold, the reviewer will need to identify a sample of purchases within each category to complete the documentation worksheets, as different requirements apply to purchases at various dollar thresholds.

- $3,000 or less
- $3,001 to $25,000
- $25,001 to $100,000

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5. Select the sample of purchase actions in each category for which file documentation will be reviewed on-site. Refer to the tab that identifies the file’s dollar amount. At a minimum, the following sample sizes should be selected:

- $3,000 or less (10 files)
- $3,001 to $25,000 (10 files)
- $25,001 to $100,000 (5 files)
- $100,001 to $499,999 (all files)
- $500,000 or more (all files)

6. Familiarize yourself with the Procurement Definitions provided in Exhibit 1.

**On-site Assessment Activities**

The on-site assessment should include the following activities:

- Interviews with purchasing staff and managers.
- Review of procurement systems and practices.
- Examination of procurement files and documentation.

1. **Management and Staff Interviews**

   Interviews with managers and staff should focus on the following aspects of procurement/purchasing. (NOTE: Utilize file “Procurement Review Checklist—Exhibit 3” to answer all of the questions below:)

   **A. Management and Oversight of Procurement Process**

   - Obtain a copy of the most recent corporate review/assessment. How recently was it conducted? Is there evidence in the report that center purchasing was reviewed? Review any findings noted. Were corrective actions implemented?

   - Does the purchasing staff have copies of corporate policies governing purchasing? Does the center have center-specific standard operating procedures on purchasing? How current are policies? Is staff knowledgeable regarding purchasing policies?

   - Does the center conduct self-assessments or internal audits of purchasing systems? What documentation supports this? What is the frequency?
To what extent does the organizational structure and purchasing procedure ensure:

- Separation of duties – requisitioning, approving, purchasing, receiving, and payment?
- Did only authorized personnel make purchases?
- Purchase requirements are authorized prior to ordering, receipt, and payment for goods or services?
- What procurement related or job specific training has the purchasing staff received within the past 12 months?
- What is the process and timing for obtaining Contracting Officer’s consent prior to award of a subcontract?

B. Price Competition

- What methods are used to obtain price competition? Under what circumstances are sole source procurements and purchases conducted?
- What processes are used for sole source solicitation? What processes are used for Request for Quote (RFQ) and Request for Proposal (RFP)? What evidence of sources solicited is maintained?
- How is price analysis performed and documented to determine if the prices offered are fair and reasonable? How is cost analysis performed and documented to determine if costs are fair and reasonable?
- What method is used to justify and document the best value determination (basis for award) when the award is made to other than the low bidder?

C. Small Business Opportunities

- Is the contractor required to track and report small business goals? If so, what is the center’s approved small business goal in the following categories? (NOTE: If the center is operated by a Small Business, no Small Business Subcontracting Plan is required, and this section may be omitted from the review.)

  - Small business
  - Small disadvantaged business
  - Women-owned small business
  - HUBZone small business
• Service-disabled veteran-owned small business

☐ How has the center performed in meeting each goal?

☐ What methods are used to track performance? How are supplier size and type determined and documented?

☐ What outreach methods are used to identify small businesses?

D. Cost Accounting Standards

☐ Does the center’s Standard Operating Procedure address the application of Cost Accounting Standards?

☐ Have Cost Accounting Standards been incorporated into contracts over $550,000?

E. Subcontractor Responsibility

☐ What methods are used to monitor subcontractor performance and delivery?

☐ How is subcontractor responsibility determined and documented? (EPLS, vendor financial capability statement, past performance evaluations)

☐ What flow down clauses and terms and conditions are included in the subcontracts? (See Exhibit 2 – Flow Down Clauses)

☐ How are the subcontractor’s insurance certificates obtained and maintained in the file?

2. File Documentation Review

A. Requisition Checklist (Exhibit 4)

Select a sample consisting of a minimum of five Requisitions and complete a checklist for each.

B. Purchase Order & Subcontract File Checklist (Exhibit 5)

Select a sample consisting of a minimum of 5 Purchase Orders and 5 Subcontracts. Complete a Checklist for each file selected.

C. Purchasing File Documentation Checklist (Exhibits 6.1–6.5)
The Purchasing File Documentation Checklist is a tool to assist in review of file documentation. It is organized into purchase categories by dollar threshold to enable the reviewer to determine if all requirements that apply to purchases within a certain dollar threshold have been documented in the purchase file.

Select the dollar threshold tab at the bottom of the Excel spreadsheet that pertains to each file: $ 3,000 or less; $ 3,001 to $ 25,000; $ 25,001 to $ 100,000; $ 100,001 to $ 499,999; or $ 500,000 or more.

For each of the sample purchase actions that are selected, complete the Checklist as follows (NOTE: Y means that this pertains to the award and is found in the file, N means that this pertains to the award and is not found in the file, and N/A means that it is not applicable to the file):

<table>
<thead>
<tr>
<th>Column #</th>
<th>Heading</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Vendor Name</td>
<td>Enter the name of the vendor</td>
</tr>
<tr>
<td>2</td>
<td>Supplies and/or Services Purchased</td>
<td>Identify the supplies or services that were purchased, i.e. Math work books, computer repair, garbage removal, etc.</td>
</tr>
<tr>
<td>3</td>
<td>Purchase Request Date</td>
<td>Enter date of request</td>
</tr>
<tr>
<td>4</td>
<td>Requisition/PO Number</td>
<td>Enter the number of the requisition or purchase order</td>
</tr>
<tr>
<td>5</td>
<td>Signature</td>
<td>Place a check mark if required signatures appear on the requisition or purchase order. Refer to the center SOP to determine who is authorized to sign for each dollar threshold.</td>
</tr>
<tr>
<td>6</td>
<td>Accounting Information</td>
<td>Place a check mark if the proper accounting information appears on the purchase request.</td>
</tr>
<tr>
<td>7</td>
<td>Requirement Description</td>
<td>Place a check mark if the requisition form has the requirement description in place.</td>
</tr>
<tr>
<td>8</td>
<td>Dollar Amount Requested</td>
<td>Place a check mark if the dollar amount requested can be found on the requisition form.</td>
</tr>
<tr>
<td>9</td>
<td>Verification of Solicitation (3 or more vendors)</td>
<td>Place a check mark once it has been verified that more than one source was solicited.</td>
</tr>
<tr>
<td>10</td>
<td>Solicitation for Sole Source/Single Source</td>
<td>Place a check mark once it has been verified that this award is a Sole Source/Single Source.</td>
</tr>
<tr>
<td>11</td>
<td>Quotes/Summary Bid Form</td>
<td>Place a check mark if the bid summary sheet can be found within the file.</td>
</tr>
<tr>
<td>12</td>
<td>Proposals/Quotes</td>
<td>Place a check mark if proposals are in the file.</td>
</tr>
<tr>
<td>13</td>
<td>Verification of Business Category</td>
<td>Place a check mark if the file contains a form, document, or name that verifies the vendor’s business category.</td>
</tr>
<tr>
<td>No.</td>
<td>Description</td>
<td>Description of checklist item</td>
</tr>
<tr>
<td>-----</td>
<td>-------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>14</td>
<td>Justification for Variances in Competition (Gov vs. Non)</td>
<td>Place a check mark if the file contains documentation that justifies not using a Government source.</td>
</tr>
<tr>
<td>15</td>
<td>Sole/Single Source (Justification for No Solicitation)</td>
<td>Place a check mark if the file contains documentation that justifies not soliciting/bidding out a contract or purchase.</td>
</tr>
<tr>
<td>16</td>
<td>Certifications required for Award (does not apply to any files less than $100,000)</td>
<td>Place a check mark if the proper certifications were in the file when required by the centers operating procedure.</td>
</tr>
<tr>
<td>17</td>
<td>Cost Accounting Standards</td>
<td>Place a check mark if Cost Accounting Standards have been documented.</td>
</tr>
<tr>
<td>18</td>
<td>Insurance Certifications required for award</td>
<td>Place a check mark if the insurance certificate can be found in the file where a professional health service or construction award exists.</td>
</tr>
<tr>
<td>19</td>
<td>Consent Letter from CO</td>
<td>Place a check mark if the center has the consent letter from their Contract Officer on file allowing them to create subcontracts, professional health contracts, and/or construction contracts.</td>
</tr>
<tr>
<td>20</td>
<td>Flow Down T &amp; C’s</td>
<td>Place a check mark if the proper flow down and terms and conditions are in the file (refer to T &amp; C attachment).</td>
</tr>
<tr>
<td>21</td>
<td>SOW (Scope of Work) Including Specifications</td>
<td>Place a check mark if the file contains a Scope of Work statement when required by the center’s operating procedure.</td>
</tr>
<tr>
<td>22</td>
<td>Verification of Signature if Bi-Lateral Agreement</td>
<td>Place a check mark if the file contains the proper signatures when entering into a bi-lateral agreement.</td>
</tr>
<tr>
<td>23</td>
<td>Change Order of Modifications</td>
<td>Place a check mark if the file contains a form, document, and/or description highlighting a change order of modification from the original PR and/or PO.</td>
</tr>
<tr>
<td>24</td>
<td>Correspondence from pre-award to close of Award</td>
<td>Place a check mark if the file contains any correspondence between the vendor/service provider and the center.</td>
</tr>
<tr>
<td>25</td>
<td>Receipt – Acceptance of Goods Date</td>
<td>Place a check mark if the file shows that the items or service purchased was received.</td>
</tr>
<tr>
<td>26</td>
<td>Invoice</td>
<td>Place a check mark if the file contains the invoice for the item or service purchased.</td>
</tr>
<tr>
<td>27</td>
<td>Comments</td>
<td>List any additional comments that are pertinent to the file.</td>
</tr>
</tbody>
</table>
c. Once the checklist has been completed, review the findings to determine if there are patterns of errors or omissions. Summarize the findings to draw conclusions regarding the completeness of purchase file documentation.

3. Exhibits

**Exhibit-1: Procurement Definitions** provides definitions of terminology used for pre-award, award and post award procurement actions.

**Exhibit-2: Flow Down Clauses** provides a listing of clauses that must be included in purchase agreements or subcontracts issued under the terms of the prime contract.

**Exhibit-3: Procurement Review Checklist** provides a tool for use by reviewers in conducting interviews of procurement personnel and reviewing policies and procedures.

**Exhibit-4: Requisition Checklist** may be used by reviewers when conducting an in-depth assessment of a center’s requisitions.

**Exhibit-5: Purchase Order and Subcontract File Checklist** may be used by reviewers in conducting an in-depth assessment of a center’s individual purchase orders or subcontracts.

**Exhibit-6.1-5: File Documentation Checklist** provides a tool for reviewers to record the results of file documentation reviews and to identify patterns and draw conclusions regarding the accuracy and completeness of file documentation. The Exhibits are organized by dollar threshold and include the requirements that are applicable to each threshold.

**Exhibit-7: Sample Procurement Review Report** provides a format and organization for reporting out on the results of a procurement assessment.
PROCUREMENT DEFINITIONS

Pre-Award

“Acquisition planning” means the process by which the efforts of all personnel responsible for an acquisition are coordinated and integrated through a comprehensive plan for fulfilling the agency need in a timely manner and at a reasonable cost. It includes developing the overall strategy for managing the acquisition.

“Adequate evidence” means information sufficient to support the reasonable belief that a particular act or omission has occurred.

“Best value” means the expected outcome of an acquisition that, in the Government’s estimation, provides the greatest overall benefit in response to the requirement.

“Bid sample” means a product sample required to be submitted by an offeror to show characteristics of the offered products that cannot adequately be described by specifications, purchase descriptions, or the solicitation (e.g., balance, facility of use, or pattern).

“Commercial item” means—

1) Any item, other than real property, that is of a type customarily used by the general public or by non-governmental entities for purposes other than governmental purposes, and—
   a) Has been sold, leased, or licensed to the general public; or
   b) Has been offered for sale, lease, or license to the general public;

2) Any item that evolved from an item described in paragraph (1) of this definition through advances in technology or performance and that is not yet available in the commercial marketplace, but will be available in the commercial marketplace in time to satisfy the delivery requirements under a Government solicitation;

“HUBZone” means a historically underutilized business zone that is an area located within one or more qualified census tracts, qualified non-metropolitan counties, or lands within the external boundaries of an Indian reservation.

“HUBZone small business concern” means a small business concern that appears on the List of Qualified HUBZone Small Business Concerns maintained by the Small Business Administration.

“Full and open competition,” when used with respect to a contract action, means that all responsible sources are permitted to compete.
“**Inspection**” means examining and testing supplies or services (including, when appropriate, raw materials, components, and intermediate assemblies) to determine whether they conform to contract requirements.

“**Insurance**” means a contract that provides for a stipulated consideration, one party undertakes to indemnify another against loss, damage, or liability arising from an unknown or contingent event.

“**Offeror**” means offeror or bidder.

“**Offer**” means a response to a solicitation that, if accepted, would bind the offeror to perform the resultant contract. Responses to invitations for bids (sealed bidding) are offers called “bids” or “sealed bids”; responses to requests for proposals (negotiation) are offers called “proposals”; however, responses to requests for quotations (simplified acquisition) are “quotations,” not offers. For unsolicited proposals, see Subpart 15.6.

“**Pricing**” means the process of establishing a reasonable amount or amounts to be paid for supplies or services.

“**Proposals**” means the act of offering or suggesting some product or service for acceptance, adoption, and/or performance.

“**Purchase Request**” means an electronic written statement asking for a product or service to be acquired.

“**Quotes**” means to state a price for goods or services.

“**Requirements**” means a prerequisite.

“**Service-disabled veteran-owned small business concern**”—

1) Means a small business concern—

   a) Not less than 51 percent of which is owned by one or more service-disabled veterans or, in the case of any publicly owned business, not less than 51 percent of the stock of which is owned by one or more service-disabled veterans; and

   b) The management and daily business operations of which are controlled by one or more service-disabled veterans or, in the case of a service-disabled veteran with permanent and severe disability, the spouse or permanent caregiver of such veteran.

2) Service-disabled veteran means a veteran, as defined in 38 U.S.C. 101(2), with a disability that is service connected, as defined in 38 U.S.C. 101(16).
“Simplified acquisition procedures” means the methods prescribed in Part 13 for making purchases of supplies or services.

“Small business subcontractor” means a concern, including affiliates that for subcontracts valued at—

1) $10,000 or less, does not have more than 500 employees; and

2) More than $10,000 does not have employees or average annual receipts exceeding the size standard in 13 CFR Part 121 (see 19.102) for the product or service it is providing on the subcontract.

“Small disadvantaged business concern” (except for 52.212-3(c)(2) and 52.219-1(b)(2) for general statistical purposes and 52.212-3(e)(7)(ii), 52.219-22(b)(2), and 52.219-23(a) for joint ventures under the price evaluation adjustment for small disadvantaged business concerns), means an offeror that represents, as part of its offer, that it is a small business under the size standard applicable to the acquisition; and either—

1) It has received certification as a small disadvantaged business concern consistent with 13 CFR Part 124, Subpart B; and

   a) No material change in disadvantaged ownership and control has occurred since its certification;

   b) Where the concern is owned by one or more disadvantaged individuals, the net worth of each individual upon whom the certification is based does not exceed $750,000 after taking into account the applicable exclusions set forth at 13 CFR 124.104(c)(2); and

   c) It is identified, on the date of its representation, as a certified small disadvantaged business concern in the data base maintained by the Small Business Administration

2) (PRO-Net); or

3) For a prime contractor, it has submitted a completed application to the Small Business Administration or a private certifier to be certified as a small disadvantaged business concern in accordance with 13 CFR Part 124, Subpart B, and decision on that application is pending, and that no material change in disadvantaged ownership and control has occurred since it submitted its application. In this case, a contractor must receive certification as a small disadvantaged business by the Small Business Administration prior to contract award.

“Solicitation” means any request to submit offers or quotations to the Government. Solicitations under sealed bid procedures are called “invitations for bids.” Solicitations under negotiated procedures are called “requests for proposals.” Solicitations under
simplified acquisition procedures may require submission of either a quotation or an offer.

“Sole source acquisition” means a contract for the purchase of supplies or services that is entered into or proposed to be entered into by an agency after soliciting and negotiating with only one source.

“Specifications” means a written statement containing a precise description of contract terms.

“Statement of Work (SOW)” is a written document that includes the work to be performed; location of work; period of performance; deliverable schedule; applicable performance standards; and any special requirements.

“Veteran-owned small business concern” means a small business concern—

1) Not less than 51 percent of which is owned by one or more veterans (as defined at 38 U.S.C. 101(2)) or, in the case of any publicly owned business, not less than 51 percent of the stock of which is owned by one or more veterans; and

2) The management and daily business operations of which are controlled by one or more veterans.

“Women-owned small business concern” means a small business concern—

1) That is at least 51 percent owned by one or more women; or, in the case of any publicly owned business, at least 51 percent of the stock of which is owned by one or more women; and

2) Whose management and daily business operations are controlled by one or more women.

Award

“Award” means a contract won by a successful bidder.

“Acquisition” means the acquiring by contract with appropriated funds of supplies or services (including construction) by and for the use of the Federal Government through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated. Acquisition begins at the point when agency needs are established and includes the description of requirements to satisfy agency needs, solicitation and selection of sources, award of contracts, contract financing, contract performance, contract administration, and those technical and
management functions directly related to the process of fulfilling agency needs by contract.

“Consent to subcontract” means the contracting officer’s written consent for the prime contractor to enter into a particular subcontract.

“Contract” means a mutually binding legal relationship obligating the seller to furnish the supplies or services (including construction) and the buyer to pay for them. It includes all types of commitments that obligate the Government to an expenditure of appropriated funds and that, except as otherwise authorized, are in writing. In addition to bilateral instruments, contracts include (but are not limited to) awards and notices of awards; job orders or task letters issued under basic ordering agreements; letter contracts; orders, such as purchase orders, under which the contract becomes effective by written acceptance or performance; and bilateral contract modifications.

“Freight” (FOB) Freight on Board: means supplies, goods, and transportable property.

“Flow down Terms and Conditions” means the list of government regulations a vendor or contractor must comply with in order to conduct business with a government-funded facility.

“In writing,” “writing,” or “written” means any worded or numbered expression that can be read, reproduced, and later communicated, and includes electronically transmitted and stored information.

“Purchase order,” when issued by the Government, means an offer by the Government to buy supplies or services, including construction and research and development, upon specified terms and conditions, using simplified acquisition procedures.

“Signature” or “signed” means the discrete, verifiable symbol of an individual that, when affixed to a writing with the knowledge and consent of the individual, indicates a present intention to authenticate the writing. This includes electronic symbols.

“Simplified acquisition threshold” means $100,000, except for acquisitions of supplies or services that, as determined by the head of the agency, are to be used to support a contingency operation or to facilitate defense against or recovery from nuclear, biological, chemical, or radiological attack (41 U.S.C. 428a), the term means—

1) $250,000 for any contract to be awarded and performed, or purchase to be made, inside the United States; and

2) $1 million for any contract to be awarded and performed, or purchase to be made, outside the United States.

“Supplemental agreement” means a contract modification that is accomplished by the mutual action of the parties.
Post Award

“Change order” means a written order, signed by the contracting officer, directing the contractor to make a change that the Changes clause authorizes the contracting officer to order without the contractor’s consent.

“Correspondence” means the communication between two parties by e-mail, fax or letter.

“Contract modification” means any written change in the terms of a contract (see 43.103).

“Invoice” means a contractor’s bill or written request for payment under the contract for supplies delivered or services performed (see also “proper invoice”).

“Option” means a unilateral right in a contract by which, for a specified time, the Government may elect to purchase additional supplies or services called for by the contract, or may elect to extend the term of the contract.

“Performance Reviews” means the evaluation of work done by a contractor, employee or vendor.

“Proper invoice” means an invoice that meets the minimum standards specified in 32.905(b).

“Receiving report” means written evidence that indicates Government acceptance of supplies delivered or services performed (see Subpart 46.6). Receiving reports must meet the requirements of 32.905(c).

“Shipment” means freight transported or to be transported.

“Substantial evidence” means information sufficient to support the reasonable belief that a particular act or omission has occurred.
EXHIBIT 2: FLOW DOWN CLAUSES

Job Corps center operations contracts incorporate the following clauses by reference which contain flow down provisions for subcontracts. The full text of the clauses is available electronically at: www.acqnet.gov

FEDERAL ACQUISITION REGULATION (48 CFR CHAPTER 1) CLAUSES

<table>
<thead>
<tr>
<th>CLAUSE</th>
<th>DATE</th>
<th>TITLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>52.202-1</td>
<td>(July-04)</td>
<td>Definitions</td>
</tr>
<tr>
<td>52.203-6</td>
<td>(Sept-06)</td>
<td>Restrictions on Subcontractors Sales to the Government</td>
</tr>
<tr>
<td>52.203-7</td>
<td>(July-95)</td>
<td>Anti-Kickback Procedures</td>
</tr>
<tr>
<td>52.203-12</td>
<td>(Sept-05)</td>
<td>Limitation on Payments to Influence Certain Federal Transactions</td>
</tr>
<tr>
<td>52.204-9</td>
<td>(Nov-06)</td>
<td>Personal Identity Verification of Contractor Personnel</td>
</tr>
<tr>
<td>52.209-6</td>
<td>(Sept-06)</td>
<td>Protecting the Government’s Interest When Subcontracting With Contractor’s Debarred, Suspended, or Proposed for Debarment</td>
</tr>
<tr>
<td>52.215-2</td>
<td>(Jun-99)</td>
<td>Audit and Records-Negotiation/Alternate II (Apr-98)</td>
</tr>
<tr>
<td>52.215-12</td>
<td>(Oct-97)</td>
<td>Subcontractor Cost or Pricing Data</td>
</tr>
<tr>
<td>52.215-13</td>
<td>(Oct-97)</td>
<td>Subcontractor Cost or Pricing Data—Modifications</td>
</tr>
<tr>
<td>52.215-14</td>
<td>(Oct-97)</td>
<td>Integrity of Unit Prices</td>
</tr>
<tr>
<td>52.215-15</td>
<td>(Oct-04)</td>
<td>Pension Adjustment and Asset Reversions</td>
</tr>
<tr>
<td>52.215-18</td>
<td>(July-05)</td>
<td>Reversion or Adjustment of Plans for Post Retirement Benefits (PRB) Other Than Pensions</td>
</tr>
<tr>
<td>52.219-8</td>
<td>(May-04)</td>
<td>Utilization of Small Business Concerns</td>
</tr>
<tr>
<td>52.219-9</td>
<td>(Sept-06)</td>
<td>Small Business Subcontracting Plan/Alternate II (Oct-01)</td>
</tr>
<tr>
<td>52.222-4</td>
<td>(July-05)</td>
<td>Contract Work Hours and Safety Standards Act—Overtime Compensation</td>
</tr>
<tr>
<td>52.222-6</td>
<td>(Jul-05)</td>
<td>Davis-Bacon Act</td>
</tr>
<tr>
<td>52.222-10</td>
<td>(Feb-88)</td>
<td>Compliance With Copeland Act Requirements</td>
</tr>
<tr>
<td>52.222-11</td>
<td>(Jul-05)</td>
<td>Subcontracts (Labor Standards)</td>
</tr>
</tbody>
</table>

August 2008
<table>
<thead>
<tr>
<th>FAR Clause</th>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>52.222-13</td>
<td>(Feb-88)</td>
<td>Compliance With Davis-Bacon and Related Act Regulations</td>
</tr>
<tr>
<td>52.222-21</td>
<td>(Feb-99)</td>
<td>Prohibition of Segregated Facilities</td>
</tr>
<tr>
<td>52.222-26</td>
<td>(Apr-02)</td>
<td>Equal Opportunity</td>
</tr>
<tr>
<td>52.222-35</td>
<td>(Sept-06)</td>
<td>Equal Opportunity for Special Disabled Veterans, Veterans of the Vietnam Era, and Other Eligible Veterans</td>
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<tr>
<td>52.222-36</td>
<td>(Jun-98)</td>
<td>Affirmative Action for Workers with Disabilities</td>
</tr>
<tr>
<td>52.222-37</td>
<td>(Sept-06)</td>
<td>Employment Reports on Special Disabled Veterans, Veterans of the Vietnam Era, and Other Eligible Veterans</td>
</tr>
<tr>
<td>52.222-50</td>
<td>(Apr-06)</td>
<td>Combating Trafficking in Persons</td>
</tr>
<tr>
<td>52.224-1</td>
<td>(Apr-84)</td>
<td>Privacy Act Notification</td>
</tr>
<tr>
<td>52.224-2</td>
<td>(Apr-84)</td>
<td>Privacy Act</td>
</tr>
<tr>
<td>52.225-13</td>
<td>(Feb-06)</td>
<td>Restrictions on Certain Foreign Purchases</td>
</tr>
<tr>
<td>52.227-1</td>
<td>(Jul-95)</td>
<td>Authorization and Consent</td>
</tr>
<tr>
<td>52.227-2</td>
<td>(Aug-96)</td>
<td>Notice and Assistance Regarding Patent and Copyright Infringement</td>
</tr>
<tr>
<td>52.227-14</td>
<td>(Jun-87)</td>
<td>Rights in Data—General</td>
</tr>
<tr>
<td>52.230-2</td>
<td>(Apr-98)</td>
<td>Cost Accounting Standards</td>
</tr>
<tr>
<td>52.230-3</td>
<td>(Apr-98)</td>
<td>Disclosure and Consistency of Cost Accounting Practices</td>
</tr>
<tr>
<td>52.230-6</td>
<td>(Apr-05)</td>
<td>Administration of Cost Accounting Standards</td>
</tr>
<tr>
<td>52.237-7</td>
<td>(Jan-97)</td>
<td>Indemnification and Medical Liability Insurance (Enter dollar threshold for each health service)</td>
</tr>
<tr>
<td>52.244-6</td>
<td>Sep-06)</td>
<td>Subcontracts for Commercial Items</td>
</tr>
</tbody>
</table>

“Flow down Terms and Conditions” means the list of Government regulations a vendor or contractor must comply with in order to conduct business with a Government-funded contract/facility.

For more information regarding the above FAR clauses, please go to [http://www.arnet.gov/far](http://www.arnet.gov/far)

August 2008
## PROCUREMENT REVIEW CHECKLIST

**JOB CORPS CENTER NAME:** _______________________________________________________________

**JOB CORPS CONTRACTOR NAME:** ___________________________________________________________

<table>
<thead>
<tr>
<th>Topic – Questions</th>
<th>Yes</th>
<th>No</th>
<th>N/A</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Management and Oversight of Procurement Process</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1 Obtain a copy of the most recent corporate review/assessment. How recently was it conducted?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Is there evidence in the report that center purchasing was reviewed?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Review any findings noted. Were corrective actions implemented?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Does the purchasing staff have copies of corporate policies governing purchasing?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Does the center have center-specific standard operating procedures on purchasing? How current are policies?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 Is center staff knowledgeable regarding purchasing policies?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Does the center conduct self-assessments or internal audits of purchasing systems? What documentation supports this? What is the frequency?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Topic – Questions</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
<td>Comments</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------</td>
<td>-----</td>
<td>----</td>
<td>-----</td>
<td>----------</td>
</tr>
<tr>
<td>To what extent does the organizational structure and purchasing procedure ensure:</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Separation of duties – requisitioning, approving, purchasing, receiving, payment?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Only authorized personnel make purchases?</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Purchase requirements are authorized prior to ordering, receipt and payment for goods or services?</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td>What procurement related or job specific training has the purchasing staff received within the past 12 months?</td>
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<td>What is the process and timing for obtaining Contracting Officer’s consent prior to award of a subcontract?</td>
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<td>Price Competition</td>
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<td>What methods are used to obtain price competition?</td>
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<td>Under what circumstances are sole source procurements/purchases conducted?</td>
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<td>What processes are used for source solicitation? Request for Quote (RFQ)/Request for Proposal (RFP)?</td>
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<td>What evidence of sources solicited is maintained?</td>
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<td>How is price analysis performed and documented to determine if prices offered are fair and reasonable?</td>
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August 2008
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<tr>
<td>and reasonable?</td>
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<tr>
<td>17 What method is used to justify and document the best value determination</td>
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<td>(basis for award) when award is made to other than the low bidder?</td>
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<td><strong>Small Business Opportunities</strong></td>
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<td>18 What are the center’s approved small business goals in the following categories?</td>
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<td>• Small business</td>
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<td>• Small disadvantaged business</td>
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<td>• Women-owned small business</td>
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<tr>
<td>• HUBZone small business</td>
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<td>• Service-disabled veteran-owned small business</td>
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<td>19 How has the center performed in meeting each goal?</td>
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<td>20 What methods are used to track performance?</td>
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<td>21 How are supplier size and type determined and documented?</td>
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<td>22 What outreach methods are used to identify small businesses?</td>
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<td><strong>Cost Accounting Standards</strong></td>
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<td>23 Does the center’s Standard Operating Procedure address the application of</td>
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<td>Cost Accounting Standards?</td>
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<td>24 Have Cost Accounting Standards been incorporated into contracts over $550,000 (refer to file review)?</td>
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<td><strong>Subcontractor Responsibility</strong></td>
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<td>25 What methods are used to monitor subcontractor performance/delivery?</td>
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<td>26 How is subcontractor responsibility determined and documented? (EPLS, vendor financial capability statement, past performance evaluations?)</td>
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<td>27 What flow down clauses, terms and conditions are included in subcontracts?</td>
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<td>28 How are the subcontractor’s insurance certificates obtained and maintained on file?</td>
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Additional Comments:

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August 2008
# Requisition Checklist

**JOB CORPS CENTER:**

Dollar Amount ______________________ Requisition No. _____________________

Supplier Name ______________________ Purchase Description _______________

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<td>Requestor Name</td>
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<tr>
<td>Department Manager</td>
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<tr>
<td>Director of Administration (Deputy)</td>
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<tr>
<td>Center Director</td>
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<tr>
<td>Property Manager</td>
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<tr>
<td>Finance Manager (Funding Authorized)</td>
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<td>Date Received in Purchasing</td>
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August 2008
# PURCHASE ORDER AND SUBCONTRACT FILE CHECKLIST

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<td>Federal Supply Sources/GSA – Statement on PO/SC</td>
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<td>Date product, goods, or service required cited</td>
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<td>Signed PO/SC copy and modifications are in the file</td>
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<td>Offeror quotations/responses on file and date stamped</td>
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August 2008
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<td>Price analysis performed and documented to determine fair and reasonableness</td>
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<td>38</td>
<td>Cost analysis performed and documented to determine fair and reasonableness</td>
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<td>Best value determination (basis of award) if competed and awarded to other than low bidder.</td>
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<td>Small Business rationale memo in the file and completed (Over $100,000)</td>
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<td>Required center and corporate approvals for PO/SC award and when applicable (legal review)</td>
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<td>Contracting Officer approval when consent is required</td>
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<td>Evidence of unsuccessful offeror notifications and/or records of debriefings</td>
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<td>Vendor financial capability</td>
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<td>Vendor/supplier PO/SC acknowledgement /official notification</td>
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<td>Justification for an other than FFP type of subcontract</td>
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<td>47</td>
<td>Correspondence</td>
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<td>Pre-negotiation memorandum (Over $550,000)</td>
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<td>Certificate of Current Pricing (FAR 15.403-4) Public Law 87-653 (Over $550,000) – TINA Certification (commercial excluded)</td>
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<td>Negotiation memorandum (Over $100,000)</td>
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<td>Confirmation of price negotiations (Over $100,000)</td>
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<td>Data Universal Numbering System (DUNS) Number – FAR 4.603 for Acquisitions Over $25,000.00 and Use of SF279</td>
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<td>CAS Certification Required (Signed/dated prior to award) – Over $500,000 (commercial and small business excluded)</td>
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<td>CAS Advance Notification (Sent within 30 days after award) – Over $500,000 (Public Law 10 U.S. Code 2306 (e))</td>
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<td>55</td>
<td>Debarment Certification/Excluded Parties List System (EPLS) prior to award - FAR 52.209-5 (CERT) – Over $25,000</td>
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August 2008
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<td>Letter Subcontract (FAR 16.603)</td>
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<td>Davis Bacon Act (clauses cited) and evidence of payroll, time cards</td>
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<td>Documentation supporting advance progress payments:</td>
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<td>Approval or disapprovals of request for waivers or deviations from PO/SC requirements (post award)</td>
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<td>61</td>
<td>PO/SC receivers and completion documentation</td>
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Additional Comments:

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## Exhibit 6.1 File Documentation Review Checklist

**Location Assessed:**

**Assessment Conducted on:**

**Assessment Conducted by:**

<p>| Vendor Name | Supply and/or Services Purchased | File Number | Purchase Request Date | Requisition/PO Number | Signature | Accounting Information | Requirement Description | Dollar Amount Requested | Pre-Award Docs | Verification of Solicitation (3 or more vendors) | Solicitation for Sole Source/Single Source (Quote) | Proposal/Quotes | Verification of Business Category | Government/GSA vs. Non | Sole Source/Single Source (Justification for No Solicit) | Certifications for Award (Ex: State License, etc.) | Insurance Certifications required for award | Award | Change Order of Modifications | Correspondence from pre-award to close of Award | Receipt - Acceptance of Goods Date | Invoice | Comments |
|-------------|----------------------------------|-------------|----------------------|------------------------|-----------|------------------------|-------------------------|------------------------|----------------|---------------------------------|---------------------------------|-------------|-------------------------------|----------------|---------------------------------|---------------------------------|---------------------------------|-------|-----------------------------|---------------------------------|-----------------------------|--------|
|             |                                  |             |                      |                        |           |                        |                         |                        |                |                                 |                                 |             |                                |                |                                 |                                |                                |       |                             |                                  |                             |         |</p>
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<th>File Number</th>
<th>Purchase Request Date</th>
<th>Requisition/PO Number</th>
<th>Signature</th>
<th>Accounting Information</th>
<th>Requirement Description</th>
<th>Dollar Amount Requested</th>
<th>Pre-Award Docs</th>
<th>Verification of Solicitation (3 or more vendors)</th>
<th>Solicitation for Sole Source/Single Source (Quote)</th>
<th>Verification of Business Category</th>
<th>Government/GSA vs. Non Special Source (Justification for No Solicit)</th>
<th>Certification for Award (Ex: State License, etc.)</th>
<th>Insurance Certifications required for award</th>
<th>Consent Letter from CO</th>
<th>Flow Down T &amp; C's</th>
<th>SOW (Scope of Work) Including Specifications</th>
<th>Verification of Signature if Bi-Lateral Agreement</th>
<th>Change Order of Modifications</th>
<th>Correspondence from pre-award to close of Award</th>
<th>Receipt - Acceptance of Goods Date</th>
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<td>Vendor Name</td>
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<td>Assessment Conducted on:</td>
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<td>Requirement Description</td>
<td>Dollar Amount Requested</td>
<td>Pre-Award Docs</td>
<td>Verification of Solicitation (3 or more vendors)</td>
<td>Solicitation for Sole Source/Single Source (Quote)</td>
<td>Quotes/Summary Bid Form</td>
<td>Proposal/Quotes</td>
<td>Verification of Business Category</td>
<td>Award</td>
<td>Consent Letter from CO</td>
<td>Flow Down T &amp; C’s</td>
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<td>Change Order of Modifications</td>
<td>Correspondence from pre-award to close of Award Receipt - Acceptance of Goods Date</td>
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August 2008
| Vendor Name | Supply and/or Services Purchased | File Number | PR | Purchase Request Date | Requisition/PO Number | Signature | Accounting Information | Requirement Description | Dollar Amount Requested | Pre-Award Docs | Verification of Solicitation (3 or more vendors) | Solicitation for Sole Source/Single Source (Quote) | Quotes/Summary Bid Form | Proposal/Quotes | Verification of Business Category | Certification for Award (Ex: State License, etc.) | Insurance Certifications required for award | Award | Consent Letter from CO | Flow Down T & C’s | SOW (Scope of Work) Including Specifications | Verification of Signature if Bilateral Agreement | Post-Award | Correspondence from pre-award to close of Award | Change Order of Modifications | Receipt - Acceptance of Goods Date | Invoice | Comments |
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|             |                                 |             | 5  |                      |                      |          |                        |                        |                        |                |                               |                                 |                |                |                               |                                 |                |                |                |                                               |                                 |                |                                               |                                |                                 |                |         |

August 2008
## Exhibit 6.5 File Documentation Review Checklist

### $ 500,000 or More

<table>
<thead>
<tr>
<th>Vendor Name</th>
<th>Supply and/or Services Purchased</th>
<th>File Number</th>
<th>Pre-Award Docs</th>
<th>Pre-Award</th>
<th>Award</th>
<th>Post-Award</th>
<th>Comments</th>
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<td>PR</td>
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### August 2008
SAMPLE PROCUREMENT REVIEW REPORT FORMAT

Section 1: Introduction

During the week of (date), the (Regional City) OASAM Regional Office conducted a purchasing system review of the Hilltop Job Corps center. The purpose of the review was to assess the extent to which the center’s purchasing policies, procedures and practices comply with applicable Government regulations and contract terms and conditions by assessing the contractor’s:

- Management oversight of the procurement process;
- Use of price competition;
- Compliance with cost accounting standards in awarding subcontracts;
- Actions to provide opportunities for small business participation; and,
- Methods of determining subcontractor responsibility.

The review was conducted by (reviewer’s name/title).

The assessment was conducted on-site at the Hilltop Job Corps center in conjunction with the Job Corps Regional Office center program assessment. The review included interviews with key managerial and purchasing staff and an examination of purchasing data, policies, procedures, records and files.

The findings of the assessment were communicated to the Center Director and key staff at a brief-out held on (date).
Section 2: Executive Summary

(Complete option 1 or 2 below as appropriate.)

Option 1:
The *Hilltop* Job Corps center is operated by the *XYZ* Corporation which has a Job Corps approved purchasing system for the period *(date)* through *(date)*. Such approval attests to the compliance of the corporation’s overall purchasing system with applicable Government regulations and contract terms and conditions, and extends to all Job Corps contracts operated by the contractor. The approval of the purchasing system obviates the need for prior consent for most purchases made by the contractor on behalf of Job Corps.

The center assessment was conducted to determine the extent to which the center’s practices comply with the approved corporate purchasing system.

-Or-

Option 2:
The *Hilltop* Job Corps center is operated by the *XYZ* Corporation which does not have a corporate wide approved purchasing system. Absent an approved system, the center is required to seek prior consent from the Contracting Officer for most purchases made on behalf of Job Corps.

The assessment was conducted to determine the extent to which the center’s policies, procedures and practices comply with applicable Government regulations and contract terms and provisions.

The following positive aspects were noted: *(List any positives that exceed standard expectations, such as the following examples)*

- To ensure staff understanding of purchasing requirements and limitations, an employee purchasing training module is required annually for all staff.
- The center tracks and monitors all vendor payment schedules effectively resulting in interest paid on less than 1% on all invoices.
- The center performs aggressive small business outreach and has exceeded its overall subcontracting goal for the contract year.

The following major concerns and findings were noted: *(Identify only major concerns in the Executive Summary. Summarize the problem as shown in the following examples. Include details in the Results section of the report.)*
1. Management and Oversight:
   
   A. Purchasing file documentation was incomplete with several files found to lack required authorizing signatures, adequate descriptions of items to be purchased and required insurance certificates.
   
   B. No evidence was present in files to document that prior consent to subcontract had been obtained for Medical subcontracts.

2. Price Competition
   
   A. Files did not include adequate justification to support non-competitive sole source awards.
   
   B. The center practices are not in compliance with corporate or center policies requiring documentation of price analysis to demonstrate that prices obtained are fair and reasonable.

3. Cost Accounting Standards
   
   A. Neither the corporate nor center operating procedures include guidance on the applicability of Cost Accounting Standards (CAS). Although two subcontracts were identified for which Cost Accounting Standards requirements were applicable, neither contained appropriate CAS requirements.

4. Small Business Opportunities
   
   A. No findings or concerns were noted.

5. Subcontractor Responsibility
   
   A. Procedures and practices did not include a pre-award check to ensure that vendors or subcontractors are not on the suspended or debarred list.
   
   B. Purchase orders and subcontracts issued by the center did not include required terms, conditions, and flow down clauses.
Section 3: Purchasing System Review Results

The review of the Hilltop Job Corps center’s purchasing system was conducted to determine the extent to which the center’s policies and practices comply with applicable Government requirements and contract terms and provisions. The assessment methodology included review of policies and procedures, purchasing file documentation, and interviews with key staff.

The file documentation review included examination of 45 individual purchase files selected from among the center’s purchases made over the past year. Files selected were representative of various dollar threshold categories to which differing documentation requirements apply. (A copy of the File Documentation Worksheet is attached to this report.)

3.1 Management Oversight of the Procurement Process

The purchasing function at the Hilltop JCC is under the direct supervision of the Director of Finance, and is staffed by a lead purchasing agent and two buyers. The staff manages a significant volume of purchases in support of center operations.

The purchasing function is guided by a comprehensive set of corporate procedures and a set of center-specific standard operating procedures.

The most recent corporate assessment of the center was conducted during the period (date) through (date) by the Director of Procurement for the XYZ Corporation. The report identified several concerns that have since been resolved by management. (In this paragraph, indicate if there has or has not been corporate oversight, documentation of corporate reviews, or resolution of issues. Describe any internal self-assessments or quality assurance systems used or checks and balances in the system to ensure integrity.)

(Include an overall assessment or judgment about the quality of the center’s system of oversight and management such as one of the following, tailored to the specific circumstances of the assessment:)

Overall, the center has effective systems in place to ensure integrity while delivering timely and cost-effective goods and services in support of center operations.

-Or-

Generally, the center’s purchasing system lacks appropriate controls and procedures to ensure integrity and the timely provision of goods and services in support of center operations.

The following findings were noted: (The following are provided as examples only)

Findings:

August 2008
1. Center practices do not comply with corporate or center standard operating procedures in that purchasing file documentation lacked required authorizing signatures, adequate descriptions of items to be purchased and required insurance certificates. Of the 45 files reviewed, the following was noted:

- 10 lacked authorized signatures from the Director as required by SOP 1500-12.
- 5 contained inadequate descriptions of items to be purchased, indicating only ‘supplies for recreation’, rather than an identification of the specific items required.
- 3 files lacked insurance certificates for subcontractors performing work on site at a Government installation as required by FAR Subpart 28.3 (Insurance).

2. Prime Contract Flow-Down Clauses – The center is not including all required prime contract flow-down provisions in subcontracts for procurements exceeding $2,500, as required by center SOP 1500-32.

3. Construction Contracting/Davis Bacon Act Requirements – There were 2 files for construction that did not meet the Davis Bacon Act Requirements, wherein the payroll records and wages are to be maintained at the center for employees performing construction work.

3.2 Price Competition

In accordance with the prime contract provisions (FAR 52.244-5, Competition in Subcontracting), and center SOP 1500-04, the center generally selects subcontractors, including suppliers, on a competitive basis to the maximum practical extent, consistent with the needs of the center.

The majority of files reviewed indicated that the center solicits offers and obtains price quotes in accordance with requirements for each dollar threshold. However, file reviews indicated that in several instances, purchases were made without competition.

The following findings were noted: *(The following are provided as examples only)*

Findings:

1. Files did not include adequate justification to support non-competitive sole source awards. Of the 45 files reviewed, 6 were for purchases to Sports Authority. No documentation was found in those 6 files that indicated that price quotes were obtained from other vendors, or the rationale for the non-competitive purchases.

2. Price Analysis/Cost Analysis – Bid abstracts were not completed for open competition awards that included the offeror prices, terms, and delivery conditions. However, the purchasing agents are not performing price/cost analysis or concluding that the prices...
were considered fair and reasonable or offered best value in accordance with Government regulations. Specifically for awards exceeding $2,500, a price analysis is required.

3. File Documentation (Blanket Purchase Agreements) – Of the 12 files reviewed that exceeded $25,000; 6 files were for BPAs for recurring services and products. The files did not contain adequate documentation to determine if the center purchasing staff was executing an option year to continue services. The file documentation did not indicate or cite references to the previous year prices, terms, or conditions.

4. File Documentation (Request for Quotations and Request for Proposals) – Although the center SOP 1500-36 includes complete procedures regarding issuance of RFPs and RFQs, the center was not following it when soliciting offerors for products, goods, or services. Purchase files did not include a copy of the description of services to be procured, to demonstrate that all offerors received an identical request for products or services. None of the files reviewed had adequate documentation to substantiate that all offerors had received identical RFPs or RFQs.

### 3.3 Compliance With Cost Accounting Standards

In accordance with FAR Part 31 (Contract Cost Principles and Procedures) contractors must obtain Cost Accounting Standards data from potential suppliers that receive awards for amounts greater than $550,000. Of the 45 files reviewed at the center, 2 exceeded $550,000. Therefore CAS requirements were applicable.

The following findings were noted: *(The following is provided as an example only)*

**Findings:**

1. The center was not in compliance with requirements to include Cost Accounting Standards coverage in its subcontracts exceeding $550,000 in value. Of the two files reviewed to which CAS was applicable, neither file included documentation that CAS information was obtained.

### 3.4 Actions to Provide Opportunities for Small Business Firms to Participate

The center performs aggressive outreach to small business firms, and has awarded 53% of its subcontracts to small businesses, exceeding its overall subcontracting goal of 47%.

The following findings were noted: *(The following is provided as an example only)*

**Findings:**

1. The center has not performed outreach to women-owned small businesses as described in their approved small business plan, and has failed to meet its goals for women-owned small businesses, achieving only .7% against a goal of 6%.
2. The center was not maintaining documentation for acquisitions exceeding $00,000, to indicate whether or not small business concerns were solicited, as required by FAR 52.219-0 and the approved center subcontracting plan.

3.5 Effective Methods for Determining Subcontractor Responsibility

As part of the file documentation review, files were examined to determine the extent to which the center documented its determination that subcontractors and vendors were considered responsible to perform the contracted services or deliver supplies.

The following findings were noted: *(The following is provided as an example only)*

Findings:

1. The center was not performing pre-award checks of the suspended and debarred contractor list (*www.epls.gov*) to determine if vendors were eligible to receive subcontracts. Of the 45 files reviewed, none contained evidence of such checks.

2. The center was not including required Purchase Order Terms & Conditions or Subcontract Terms & Conditions as flow down to vendors or subcontractors, as required by the prime contract. Although both the center’s policy 1500-38, and the purchase orders themselves indicate that such terms and conditions are shown on the back of purchase orders, this was not the case as shown in any of the 45 files reviewed.

Section 4: File Documentation Review Worksheet

*(Attach a copy of the file documentation worksheet completed during the assessment.)*
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**June 23, 2010**
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Data Integrity Assessment Guide

1. Background and Objectives

Recognizing the importance of ensuring the accuracy of the data entered into Job Corps data systems by contractors, the Job Corps National Office convened a data integrity workgroup to address this issue several years ago. This workgroup, consisting of National Office staff, Regional Office staff, and national support contractors, and later joined by center operators, began developing the current assessment program in early 2005. Workgroup participants began conducting pilot data integrity assessments as part of Regional Office Center Assessments (ROCA) in April 2005, continually refining these procedures as changes in the Policy and Requirements Handbook (PRH) and related program guidance have been issued. Data integrity assessments were expanded in the fall of 2007 to cover Career Transition Services (CTS) agency records.

The purpose of the data integrity assessments (DIA) is to ensure the validity and reliability of the information supporting Job Corps’ performance management systems. The assessments provide a mechanism for Regional Office staff to identify and report on specific instances of improperly reported or anomalous data as well as on management practices that could potentially affect data integrity.

The goal of this guide is to give Regional Office staff and national support contractors an understanding of the assessment process that will enable them to perform record reviews of Job Corps centers and CTS agencies. In addition to serving as a training document, this guide provides reference materials that data integrity reviewers can turn to as a resource during the assessment itself. The first three sections provide an overview of the process to be used in conducting a data integrity assessment. The following three sections (four through six) provide detailed information on each of the three areas reviewed as part of the Job Corps center assessments (General Equivalency Diploma [GED]/high school diploma [HSD] attainment, Career Technical Training [CTT] completion, and student leave). The seventh section provides similar guidance for reviewing and evaluating the quality of placement records at CTS agencies. The final section addresses issues concerning reporting assessment results. Additional reference information and examples are provided in appendices.

Overview of the Assessment Process

To date, the data integrity assessments have typically been conducted as part of the ROCA process. These assessments differ from the reviews of student records that have historically been performed during assessments. The data integrity assessments are designed to focus narrowly on instances where data submitted by centers via the Center Information System (CIS) may have been entered inappropriately or inaccurately, and where these inconsistencies may have affected payments to contractors by influencing their outcome measurement system (OMS) rating or on-board strength (OBS).

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Data integrity assessments may be performed by Regional Offices onsite during center or CTS agency assessments or remotely from the Regional Office. The latter option entails having the center operator send the requested student records to the Regional Office for review. This strategy allows Regional Office staff to assess the records prior to the on-site ROCA and to present the results during the assessment brief-out, freeing staff resources for other duties during the assessment itself.

Assessments of separated students’ files form a key part of both the DIA and ROCA. Records are reviewed to ensure that PRH standards have been fully met by centers and documented appropriately in students’ files. GED/HSD attainment while at Job Corps, CTT completion, and student leave are reviewed. Additionally, as part of DIAs or ROCAs, student files may be reviewed to ensure regulations pertaining to Outreach and Admissions (OA) activities and CTS efforts, including verification of placements and initial wage, are being followed.

To ensure efficiency, automated student data from the previous four quarters are reviewed. Algorithms have been developed to identify the usual flow and data patterns associated with most students’ Job Corps experience. When these algorithms are used and student data patterns do not conform to expectations because of questionable leave/attendance patterns or other anomalies, the student’s file is flagged. When a student’s record has been identified as potentially containing an error, it is selected into a pool for possible review. Up to 40 records of students separating from a center in the past four quarters will be selected for review in each of the three key areas—GED/HSD attainment, CTT completion, and student leave. GED/HSD attainment and CTT completion have a direct bearing on OMS outcomes, while centers’ management of student duty/pay/leave status affects their ability to meet the OBS commitments specified in their contracts.

Identifying a student file does not mean that the file is in error. Documentation in the file may support the coding entered into the file. Only visual inspections of the supporting documents included in the file—transcripts, Training Achievement Records (TARs), and leave forms—will answer questions concerning file accuracy and legitimacy. Assessment team members must review the physical records for students in the samples to ensure that there is documentary support for the performance data that appears in CIS and track the cases where documentary support is insufficient. Again, this highlights the value of properly documented, orderly files. If documentary evidence is missing or insufficient because it does not conform to requirements, centers can be charged liquidated damages. Even if appeals and later negotiations minimize the actual liquidated damages reimbursed to the government, properly documented files obviate the need for labor and resources to be expended in such efforts.

Data integrity assessments of CTS agencies focus on placements. The goal of these assessments is to ensure that placements claimed in the CTS database are properly documented and meet the placement criteria.

During the course of the center or CTS assessment, reviewers will likely identify potentially invalid GED/HSD, CTT, or placement credits as well as days the center had a student in the wrong duty/pay/leave status. However, it is important to remember that these errors may occur for a number of reasons and do not necessarily mean that there is an integrity issue. Part of the
review process will require follow-up with the center on issues identified through the records review to determine the reasons for the discrepancies in the records.

NOTE: When assessing student records, reviewers should take care to ensure that they are checking for compliance with the PRH policies in effect at the time the student was on center. Because the assessments cover separated students, in some cases this may mean that requirements have changed between the time the student was on center and the time of the assessment; in such cases the reviewers must take care to follow the requirements that were in effect at the time the student attended Job Corps.

2. Pre-Assessment Activities

First, assessors should inform the center or CTS agency in writing that the Regional Office will be conducting a data integrity assessment. This letter should also request that the center be prepared to provide the following information to the data integrity team:

For Assessments of Job Corps Centers

- Calendar of center holidays and other non-training days covering the 3 years prior to the visit (if this information is not available via the CIS).
- List of approved institutions that award GED/HSDs to students at the center and evidence of the institutions’ accreditation.
- List of all vocational training programs that have been available at the center for the past 3 years and the TARs that have been used for each (including earlier versions and the dates these versions were used).
- The center’s standard operating procedures (SOP) for processing and updating TARs.
- The center’s SOP for awarding and documenting student leave. This should include a list and copies of the signatures of individuals authorized to approve leave. If applicable, the center should also include any earlier versions of the SOP that were in force during the 3 years prior to the assessment visit and the names of any additional individuals that were previously authorized to approve leave.

For Assessments of CTS Contractors

- List of CTS placement specialists and officials authorized to approve placements during the assessment period.
- Copies of verification forms used during the assessment period.

NOTE: For center assessments, the Excel spreadsheets containing the prescreened samples must be downloaded from the Job Corps Resource Library (JCRL) prior to the review (see Appendix 1 for details on accessing data integrity samples via JCRL). For assessments of CTS agencies, sample spreadsheets will be provided by Battelle on request prior to the assessment.

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The center assessment file contains six worksheets (labeled Instructions, GED, Voc, Leave, Leave Records, and Review List), and the CTS assessment file contains three (labeled Instructions, Placement, and Review List). During the course of the assessment, the reviewers will enter notes into these worksheets to document the results of the review.

The sheets labeled GED, Voc, and Leave in the center assessment files and the Placement worksheet in the CTS assessment files provide details on the students in each sample. The samples are composed of students who meet the targeting criteria and whose separation dates fall within the period given at the top. Each of the three center-based samples is sorted by separation date, while the CTS samples are sorted by the date the student reported to their job, school, or military placement.

Each of the three center-based samples is capped at 40 students. In cases where more than 40 students meet the screening criteria, 40 students have been randomly selected from among those that meet the criteria and presented on the sample worksheets; the total number of students meeting each of the screening criteria is given at the top of each worksheet.

For both the center and CTS samples, a full list of the students selected for review is given in the Review List worksheet. The students are arranged by the sample for which they were selected and sorted by separation date (by date reported for CTS samples). For center-based samples, in cases where a student is included in more than one sample, the other sample for which the student’s file should be reviewed is noted in the “Duplicate” column. Note that these lists can be easily re-sorted in Excel (e.g., by last name).

Prior to the assessment or monitoring visit, reviewers should familiarize themselves with the samples and take several additional steps to prepare for the assessment (see Exhibit 1).
Exhibit 1: Pre-Assessment Checklist for Data Integrity Assessments

<table>
<thead>
<tr>
<th>Step</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sample review meeting (optional)</td>
<td>If desired, request a teleconference with Battelle to discuss the samples and ask any questions prior to the review. Details of this teleconference will be tailored to the needs of the reviewers. To request a meeting, contact Andrew Bauck (206-528-3018, <a href="mailto:baucka@battelle.org">baucka@battelle.org</a>).</td>
</tr>
<tr>
<td>Print and present review list, and request additional information</td>
<td>Prior to the review, print the Review List worksheet, which gives the names and separation dates for students whose files have been selected for review, organized by review area (for on-site center assessments). This list also notes students that have been selected for review in multiple areas in the “Duplicate” column. Present this list to the records officer at the beginning of the assessment visit or, if conducting the assessment at the Regional Office, have the center or CTS agency send the records for these students. Request the center or CTS agency provide the additional information listed above (bulleted points under section 2, Pre-Assessment Activities) along with the records selected for review.</td>
</tr>
<tr>
<td>Reference documents</td>
<td>A hardcopy of this guide will be a valuable reference during the file review. An electronic version of the PRH stored on each computer used by reviewers will prove useful as well.</td>
</tr>
<tr>
<td>Computer for each reviewer</td>
<td>The reviewers will need a laptop for the assessment or will need to make arrangements with the center to have a computer with both CIS access and Excel for the review. Centers now have the option of entering verification information for students directly into CIS, which may mean that all documentation will not be found in the student file. Reviewers will need to access the CIS to obtain the information. Additionally, reviewers will enter their findings into the Excel worksheets as they go. <strong>Reviewers should also regularly save and back up their work as they go to prevent any accidental loss of data.</strong></td>
</tr>
</tbody>
</table>
| General best practices and tips     | 1. Alphabetize (sort) worksheets by students’ last names before review of student files to facilitate matching the name on the Excel worksheet with the student file.  
2. For multiple reviewers, each reviewer should include his/her initials in the “Notes” column heading on the worksheet to assist with copying and pasting when merging findings into one spreadsheet.  
3. In the final report of findings for each center, include a section on administrative findings, such as well organized and documented files, loose papers/disorganization, and any issues noted with the file or documentation that should be brought to the attention of the center staff but were not found to be potentially invalid credits or questionable leave days. |

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3. Initial Assessment Procedures

After arriving at the center, CTS agency, or Regional Office, the review team should begin the assessment process by participating in a scheduled brief-in and presenting the list of student records to be assessed to the center’s Records Officer. In cases where the review is being conducted at the Regional Office, the region should request that the center or CTS agency send the records and additional information to the Regional Office. It is recommended that centers remove students’ sealed medical records before sending them to the Regional Office, as these are not needed. Additional initial steps are given in Exhibit 2.

Exhibit 2: Preliminary Checklist for Data Integrity Assessments

<table>
<thead>
<tr>
<th>Step</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Present list of requested records to Records Officer (onsite assessments)</td>
<td>Before the brief-in with center or agency staff, give the Records Officer the printed Review List worksheet. Request that the records of these students be brought to a secure space where the reviewers will work.</td>
</tr>
<tr>
<td>Have center send requested records to Regional Office (assessment at RO)</td>
<td>If the assessment will take place at the Regional Office, send the center or agency the list of names on the Review List worksheet and request that they send the records for these students to the Regional Office. Clarify, if necessary, that the center should send the entire student file for each record, not excerpts. However, it is recommended that centers remove students’ sealed health records prior to sending the files.</td>
</tr>
<tr>
<td>Request additional documents (see bulleted points under section 2, Pre-Assessment Activities)</td>
<td>The supplemental information listed above (bulleted points under section 2, Pre-Assessment Activities) is necessary to determine whether the center or agency was adhering to its own stated policies regarding GED/HSD attainment, vocational completion, leave approvals, and placement verification. Before beginning the assessment, review these documents to confirm that the center is adhering to Job Corps policy (e.g., ensure that the SOP on leave is consistent with the PRH and that the trades are using the correct versions of the TARs).</td>
</tr>
<tr>
<td>Plan assessment strategy</td>
<td>Before beginning to look at records, the reviewers should determine their strategy for conducting the assessment. Decisions may include the number of records in each category to review, how to divide the records, which records to review first, and how decision rules will be documented. For example, a review team may decide to have one person review leave records and one person review vocational records, or may jointly participate in the review of each area.</td>
</tr>
<tr>
<td>Determine final product of review</td>
<td>By planning in advance what the end product of the assessment will be, the reviewers can plan their time better and ensure that the notes recorded along the way will serve the needs of the end product. Depending on the Regional Office’s needs, the end product may include the completed spreadsheets, a separate summary report, slides for the brief-out presentation, or other documents.</td>
</tr>
<tr>
<td>Begin review Start with leave (recommended for center)</td>
<td>Because student leave files tend to be more complicated and take longer to review, it is recommended that reviewers begin assessments by looking at records in the leave sample.</td>
</tr>
</tbody>
</table>

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### Calibrate decision process among reviewers continually

For at least the first several files being reviewed, it is recommended that the reviewers share what they are finding with each other, as well as what decisions they made in a particular case and why. This will allow the reviewers to talk through the decision process for specific types of cases, help ensure uniformity between records reviewed by different individuals, and identify frequently occurring patterns.

### Keep records in locked space

Student records are confidential, and it is critical that they be kept in a locked room at all times.

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**4. Assessment of GED/High School Diploma Attainment**

**Purpose**

The goal of the assessment of GED/HSD attainment is to confirm that the center has adhered to Job Corps policy in claiming credits for GED/HSD attainment.

The basic procedure for the assessment of GED/HSD attainment is to ensure that each student file selected for review has a copy of a valid GED certificate or HSD and that the dates on the acceptable documentation show that the degree was earned during the period of enrollment.

**Reporting and Documentation Requirements for GED/HSD Attainment**

PRH guidelines (dated 7/14/08) regarding reporting, documentation, and record keeping for HSD and GED attainments relevant to DIAs include (from section 3.11, R4, a):

**R4.a. HSD/GED Completion Reporting**

1. The GED completion date recorded in CIS will be the date on the student’s GED certificate, if available. If the GED certificate cannot be obtained prior to a student’s separation, the center can enter the date of the student’s last GED test on the official notification from the GED testing center indicating the student has passed the GED.

2. The official HSD completion date recorded in CIS will be the date on a student’s diploma. If the diploma is not available at the time of a student’s separation, the center can enter either (a) the date of the official letter from the diploma-granting institution indicating the student has met all the requirements for graduation and will be issued a diploma at a later date, or (b) the date on the student’s official high school transcripts indicating graduation.

b. **HSD/GED Final Documentation**

1. Copies of the GED certificates or official GED scores shall be included in students’ permanent files.

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2. Copies of HSDs students earned while on center, final high school transcripts (if the students earned their diplomas from a center accredited as a degree-conferring high school), and supporting documentation on special education services, as applicable for students with documented disabilities, shall be included in students’ permanent files.

Sample and Selection Indicators

The GED worksheet of the assessment samples file contains students that meet screening criteria that make them more likely than a randomly selected student to have data integrity issues with their GED or HSD attainment. All files meeting the screening criteria are entered into a pool for potential review. From this pool, files are randomly selected until 40 individual student files have been selected (the cap for review). It should be noted that student files may meet multiple selection/screening criteria. The number of files given as the total in the GED worksheet may be less than the sum of the students meeting each of the individual criteria. The files are selected for review based on criteria listed below in Exhibit 3.

Exhibit 3: Reasons for Inclusion in the GED/High School Diploma Sample

<table>
<thead>
<tr>
<th>Selection Reason</th>
<th>Targeting Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short</td>
<td>The student attained a GED/HSD within 30 days of enrolling in Job Corps.</td>
</tr>
<tr>
<td>Timing</td>
<td>The student attained a GED/HSD within 1 week of an AWOL or disciplinary separation.</td>
</tr>
<tr>
<td>Dup (Duplicate)</td>
<td>The student attained a GED/HSD during enrollment despite OA records indicating that they had earned one prior to Job Corps enrollment.</td>
</tr>
<tr>
<td>No Gain</td>
<td>The student attained a GED/HSD despite failing to achieve a learning gain after having initial Tests of Adult Basic Education (TABE) scores low enough to place them in the math or reading learning gains pool.</td>
</tr>
</tbody>
</table>

While the total number of students in the sample is capped at 40, the information from the review can give an indication of how widespread the problems found during the assessment are in the center’s larger population. Upon request, reviewers can be provided with a worksheet containing all cases who meet the targeting criteria instead of having the sample limited to 40.

Reviewer Worksheets and Documents

As seen in Exhibit 4, the header on the GED worksheet gives information regarding the center and time period covered by the assessment, as well as the total number of cases meeting each of the targeting criteria. The GED worksheet provides identifying details and other potentially useful information for each student selected. Blank columns are included for reviewer comments. The “Selection Reason” column corresponds to the definitions given in Exhibit 3.

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Exhibit 4: Example of GED Worksheet

In addition to the worksheet, reviewers will need to refer to several documents, both those requested prior to the review and those within the file. Exhibit 5 lists documents to be used during the assessment of GED/HSD attainment.

Exhibit 5: Documents to Use in GED/High School Diploma Review

<table>
<thead>
<tr>
<th>Document</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>GED worksheet</td>
<td>This worksheet provides summary information on all the students in the GED/HSD attainment sample, sorted by separation date. Pay particular attention to the selection reason, as this gives an indication of potential problems that should be examined during the review. Use this worksheet to record the findings of the GED/HSD review for each student.</td>
</tr>
<tr>
<td>GED certificate (diploma) in file</td>
<td>For each student who was credited with obtaining a GED while on center, there ideally will be a copy of a valid GED certificate from an authorized issuing authority.</td>
</tr>
<tr>
<td>GED official test scores in file</td>
<td>All students should have official test scores from the GED testing center in the file indicating the date the student passed the last section test of the GED. This official document may be used to determine whether or not the student attained the GED during the enrollment period if the certificate (diploma) was issued after the student's separation date.</td>
</tr>
<tr>
<td>HSD in file</td>
<td>For each student who was credited with obtaining an HSD while on center, there ideally will be a copy of a valid HSD issued by an accredited institution.</td>
</tr>
<tr>
<td>Transcript of HSD coursework completed on center</td>
<td>All students who have obtained an HSD should have an official transcript of coursework completed on center (during enrollment period). The transcript can give the reviewer an indication of how the student progressed academically and whether the credits</td>
</tr>
</tbody>
</table>
earned are sufficient for issuance of an HSD. Additionally, when the diploma has been issued after a student’s separation date, the transcript can provide documentation of completion (stated graduation date) during the student’s enrollment period.

<table>
<thead>
<tr>
<th>Official letter from HSD program</th>
<th>When the diploma has been issued after a student’s separation date, an official letter from the program indicating the time frame in which the student completed the program can be used to determine whether or not the student attained the HSD during the enrollment period.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form ETA 6-40 Student Profile Report (ETA 6-40)</td>
<td>Section 6.3 (R3) of the PRH requires that the ETA 6-40 report be in the file of each separated student. This form can be extremely useful to reviewers because it contains details on students’ daily status that may be useful in assessing the validity of GED/HSD attainments and student’s enrollment when diploma/certificate was attained.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supplemental Documents That May Be Useful</th>
</tr>
</thead>
<tbody>
<tr>
<td>OA enrollment package showing highest grade completed (ETA 6-52)</td>
</tr>
<tr>
<td>Transcript of coursework completed prior to JC enrollment</td>
</tr>
<tr>
<td>Case notes</td>
</tr>
</tbody>
</table>

**Validating GED/HSD Attainment and Entering Notes**

**Valid GED Documentation:** The student’s file must contain evidence that the GED requirements were completed during the enrollment period. In most cases, this will be a GED certificate (diploma) with issue dates falling within the enrollment period. It is also important to recognize that due to a possible delay between the completion of requirements and the official certificate/diploma issue date, the date the GED is issued by the testing authority may fall after the student’s separation date. Per PRH Section 3.11 R4.a.1 above, centers are encouraged to enter the date of the last GED test (the last section test the student passed to acquire the GED) indicated on the official GED notification/transcript into CIS and provide documentation in the student file regarding GED test scores and dates. Additionally, in cases where the student has completed the GED requirements but the official certificate has not yet been issued, a letter from the approved GED program/issuing agency indicating that the certificate is forthcoming also is sufficient. Finally, if the file contains a certificate/diploma dated after the student separated from the program, counselor documentation of the student’s testing date along with the certificate will be sufficient. Note that in some states it is possible for a student to enter Job Corps having
already passed some of the GED exams and earn a credit by taking and passing the final exam(s) during the enrollment period.

Valid HSD Documentation: The student’s file must contain evidence that the diploma’s requirements were completed during the enrollment period. In addition, the diploma must be issued by an accredited institution recognized by the Regional Office. Usually, the documentation will be a copy of the diploma itself, with a date within the enrollment period. However, some institutions issue diplomas only once or twice a year, and it is possible for a diploma that was earned during the enrollment period to be issued following a student’s separation date. In these cases, there should be additional evidence that the student completed the requirements during his or her Job Corps enrollment (e.g., course transcript showing the date requirements were completed, a dated document stating that the requirements have been met and the diploma will be forthcoming). In cases where student has completed the requirements for the diploma but it has not yet been issued by the granting institution, a letter stating that the requirements have been met is sufficient documentation.

Exhibit 6 provides further discussion of specific situations that may be encountered in the review of GED/HSD attainment.

After reviewing each student’s GED/HSD records, the reviewer should enter notes (in the “Notes” column) in sufficient detail to enable a third party looking at the worksheet after the visit to understand what the reviewer found and how they made their determination. At the very least, the notes section should include the following:

- Identify the type of documents found in the file (GED/HSD diploma, certificates, transcripts, etc.)
- The dates the verifying documents were issued
- The agency or program issuing the diploma, certificate, transcripts, etc.
- Whether or not the student was enrolled in the Job Corps program when the GED/HSD was attained

In cases where the reviewer determines that a student had been granted a GED/HSD completion inappropriately, the reviewer should mark an “X” in the “RO Dec: Invalid” column. The reviewer also should note reasons for the potential invalidation in the “Notes” column of the spreadsheet.

The reviewers also should note any Administrative Issues found during the review. Administrative Issues, such as noting well organized and documented files, loose papers/disorganization, and any other factors that did not result in potentially invalid credits but that should be brought to the attention of the center staff, should be included in a separate section in the final report.

After completing their assessment of all records in the GED/HSD sample, reviewers should take the following steps to consolidate and summarize their findings:

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• If necessary, combine the separate GED Excel worksheets used by different reviewers in a single file. This means copying and pasting entries in the “RO Dec: Invalid” and “Notes.” Retain the original (separate) files each of the reviewers generated in case any data are lost due to errors while copying.

• Count the number of cases determined to be potentially invalid. This can be done on the GED worksheet itself.

• In a separate document, summarize the causes for the potentially invalid findings and the number of potentially invalid credits associated with each cause (e.g., two due to no documentation in file, one due to GED before Job Corps enrollment).

• Summarize any administrative findings (i.e., recordkeeping inconsistencies) that should be corrected but do not threaten the validity of any GED/HSD credits.
### Exhibit 6: GED/High School Diploma Review Issues

<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard Review Tools</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>No GED certificate or HSD in file</td>
<td>GED certificate in file, official GED transcript from issuing agency, HSD and transcript</td>
<td>Failing other acceptable documentary evidence, if the reviewer determines that the file does not contain a copy of a valid GED certificate from an authorized issuing authority or a copy of a valid HSD issued by an accredited institution, the GED/HSD attainment should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column and include reasons in “Notes” column.</td>
</tr>
<tr>
<td>HSD from unapproved program</td>
<td>HSD in file, list of approved HSD programs provided by the center</td>
<td>If the reviewer determines that the only HSD in the student’s file was granted by an unaccredited institution or a course of study that was not approved by the Regional Office, the GED/HSD attainment should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column and include reasons in “Notes” column.</td>
</tr>
<tr>
<td>Date of GED/HSD does not match date on GED worksheet</td>
<td>GED/HSD in file, GED worksheet, official GED transcript from issuing agency, supporting documentation from HSD program (official transcripts, letters, etc.), counselor documentation of student GED test dates or indication that certificate/diploma is forthcoming</td>
<td>If the date on the GED certificate or HSD is later than the date given on the GED worksheet or after the student separated from Job Corps, the reviewer should attempt to determine the date the GED test was actually taken or the date the HS coursework was completed. It is possible that the GED/HSD attainment is still valid because the date on the documentation may correspond to the issue date rather than the date of the test or the date the coursework was completed. If the reviewer cannot determine if the HSD/GED attainment was earned during the student’s enrollment period from the documentation in the student’s file, the reviewer should put an “X” in the “RO Dec: Invalid” column and include reasons in “Notes” column.</td>
</tr>
<tr>
<td>GED taken after student was or should have been separated or HSD requirements completed after student was or should have been separated</td>
<td>GED in file, Form ETA 6-40, official GED transcript from issuing agency, HSD in file, supporting documentation from HSD program (official transcripts, letters, etc.)</td>
<td>In cases where the reviewer determines that the student took all or part of the GED exam after separating from Job Corps (or completed credits for the HSD), or during a period when the center should have separated the student but retained him or her only to take the exam (e.g., unpaid leave before disciplinary separation), the GED/HSD attainment should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column and indicate reasons in “Notes” column.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard Review Tools</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Duplicate GED/HSD on file</td>
<td>GED/HSD in file; transcript, diploma, or</td>
<td>If the student has documentation of a GED or HS diploma earned prior to enrolling in Job Corps, but has been credited with GED/HSD attainment, the GED/HSD attainment should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column. (It is important to check for evidence of a prior GED/HSD for students selected under the “Dup” criteria.) Note that it is permissible for a student to earn both a GED and HSD on center; this would not constitute a data integrity violation. However, the center can only receive credit for one type of attainment (either GED or HSD) during the student’s enrollment at Job Corps.</td>
</tr>
</tbody>
</table>
FAQs Regarding Assessment of GED/HSD Credits

1. What do I do if I find GED scores in a student’s record but no official GED certificate?

   Official GED test scores are sufficient documentation if all tests are documented as “pass” and tests are passed during student enrollment.

2. If a student reports to Job Corps with a foreign HSD, is it acceptable?

   Yes; refer to the PRH Chapter 1 Exhibit 1-1 (page 8) for resources to validate a diploma from a foreign country.

3. Is the GED a valid credit if the certificate was issued after the student was separated from Job Corps but the documentation verifies the student was present on center on the date when all the GED exams were passed?

   Yes.

4. Can the center receive credit for one student completing both a GED and HSD while enrolled in Job Corps?

   No, a center can only receive credit for one attainment, either a GED or an HSD, during a student’s enrollment.

5. Can the center receive HSD credit for a student who completes an HSD while enrolled in Job Corps despite enrolling with a valid GED (attained prior to entry)?

   No.

6. What is considered acceptable documentation of an HSD or a GED attainment/issue date if the diploma or certificate was issued/dated after the student has separated from Job Corps?

   For GED verification, a GED official certificate and/or official dated GED test scores are acceptable documentation (assuming the tests were passed while the student was enrolled on center). Center staff can include case notes in the student file verifying that the student successfully passed the GED exams on a particular date if the GED documentation is not available. For HSD verification, an HSD or completed transcript is also adequate if it is dated with successful completion of all requirements within the student’s enrollment period. An official letter from the HSD program also is acceptable.

7. Why are student records selected for “short”, “timing,” or “no gain”? Does this change how the records are reviewed?

June 23, 2010
Student records are selected for “short” (defined as GED or HSD attainment within 30 days of enrollment), “timing” (defined as GED or HSD attainment within 1 week of a AWOL or disciplinary separation), or “no gain” (defined as achieving GED/HSD credit despite a lack of gain on the TABE) as these are indicators that make the record more likely to manifest data integrity issues. Reviewers use the same audit process to verify documentation of GED or HSD attainment.

8. Is a copy of the GED certification or HSD diploma acceptable or must these documents be originals?

A copy of the GED certificate and/or GED official test scores, or HSD and/or completed high school transcript is sufficient. Originals are not necessary.

9. What is meant by GED attainment? Is this the date the student successfully completed the requirements for a GED or the date the official certificate was issued by the GED accreditation body?

The GED attainment date entered into the CIS is the date the official certificate was issued by the GED accrediting agency. However, if the student separates from Job Corps prior to receipt of the certificate, the date the student passed the last section of the GED test, as shown on the official copy of GED test scores, can be entered. Additionally, if the certificate is dated after the student’s separation, the student’s file should contain official test scores, a letter, or additional documentation indicating that the student passed the GED test during the enrollment period.

Tips/Best Practices Regarding Assessment of GED/HSD Credit

1. Check student’s enrollment and separation dates and make sure they match the student’s ETA 6-40 form (or information in the CIS).

2. Check OA documents in student file to determine highest grade completed.

3. Check OA documents in student file to determine if the student entered Job Corps with a GED or HSD.

4. Check OA documents in student file for documentation related to GED/HSD attainment prior to Job Corps enrollment (test scores, transcripts, certificates, diplomas, and official letters).

5. Check student’s ETA 6-40 form for graduation/termination date to compare with GED/HSD attainment date.

6. Check that the file contains documentation that the student earned the GED/HSD (transcripts, diploma, certificates, test scores, official letters of completion).
7. Ensure that documentation in the file supporting the attainment of a GED/HSD verifies the attainment was earned during the student’s enrollment.

5. Assessment of Career Technical Training

Purpose

The goal of the assessment of CTT completion is to confirm that the center has adhered to Job Corps policy in granting training completion status.

The basic procedure for the assessment of CTT completion is to ensure that each student selected for review has completed the CTT via review of the TAR entered into the CIS for completion credit and that the dates on the documentation show that it was completed, and acknowledged as completed by the instructor, during the student’s period of enrollment.

Reporting and Documentation Requirements for Career Technical Training

PRH guidelines (dated 7/14/08) regarding reporting, documentation, and record keeping for CTT completion relevant to data integrity assessments include (from section 3.13, R6, and section 6.3, R3[a]):

3.13, R6. Reporting/Documentation/Record Keeping

Centers shall ensure that all students’ test results and progress are documented on TARs as progress occurs and recorded using the automated Center Information System (CIS).

6.3, R3. Separation

At the time of a student’s separation from Job Corps, centers shall:

a. Combine all records listed below pertaining to that student into a single record and store it in a central location on center. Records of separated students shall contain documents as specified below:

6. Original Training Achievement Record (TAR)

Additionally, directions included in the front pages of each TAR (all TARs can be found on the Job Corps Community Web site) lists the following summary of requirements that must be met in order for a TAR to be considered completed and for a student to be considered a program completer (see complete document on the above Web site or the beginning pages of TARs for each vocation):

1. Students must complete all duties and tasks on the TAR to be considered program completers.
2. When a student performs a required duty/task, the instructor will rate the student’s performance level by circling 1, 2, or 3.
   - Updates must occur, at minimum, on a weekly basis.
   - A rating score of 2 (Proficient) is the minimum performance rating for TAR skills completion.
   - If a student performs at level 1 performance, the instructor will circle the number \textit{in ink} but will \textbf{not} include the date in the Date Completed column of the TAR. When the student performs the duty/task at a level 2 or 3, the new rating will be circled \textit{in ink} and the date will be recorded in the Date Completed column at that time (if the student goes on to achieve a level 3 performance at a later date, a new date for completion does \textbf{not} need to be included on the TAR).

3. When the student completes the TAR, the instructor must finalize the TAR by checking the Completed box and entering the date of completion (month/day/year of the final task/duty) on page one of the TAR. The TAR should be signed as completed by the instructor at that time and prior to the student’s separation from the Job Corps program. TARs signed as completed after a student is separated should be considered a potentially invalid credit by the reviewer.

4. If the student terminates the training program (or Job Corps) prior to TAR completion, the instructor must check the box indicating that the student terminated CTT training and enter the date the student terminated CTT training on page 1 of the TAR. \textit{NOTE}: on page 1 of the TAR, the Date Entered Current Training and the Terminated Training section both refer to the CTT training and \textbf{not} the date the student entered or separated from Job Corps (unless the student began or terminated CTT training on the same dates).

5. The TAR section entitled Employer Specific Skills is an \textit{optional} section that can be used by the instructor to note any specific job skills the student has acquired but that are not included specifically on the TAR. The space can also be used to record any special skills important to a specific employer or those acquired during Work-based Learning (WBL).

6. Instructors will complete the certification section of the TAR found on the last page, and this information is to be recorded on the TAR and in CIS.

\textit{Sample and Selection Indicators}

The CTT worksheet of the assessment samples file contains students that meet screening criteria that make them more likely than randomly selected students to have data integrity issues with their CTT completion status. All files meeting the screening criteria are entered into a pool for potential review. From this pool, files are randomly selected until 40 individual student files have been selected (the cap for review). It should be noted that students may meet multiple selection/screening criteria. The number of files given as the “Total” in the CTT worksheet may be less than the sum of the students meeting each of the individual criteria. The files are selected for review based on the criteria (Exhibit 7):

June 23, 2010
Exhibit 7: Reasons for Inclusion in the Career Technical Training Sample

<table>
<thead>
<tr>
<th>Selection Reason</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Short</strong></td>
<td>The student completed his or her primary (highest) CTT program in 45 days or less, as measured from the given Voc 1 Begin Date to the Voc 1 End Date.</td>
</tr>
<tr>
<td><strong>Timing</strong></td>
<td>The student completed his or her primary (highest) CTT program within 1 week of an AWOL or disciplinary separation.</td>
</tr>
</tbody>
</table>

While the total number of students in the sample is capped at 40, the information from the review can give an indication of how widespread the problems found during the assessment are in the center’s larger population. Upon request, reviewers can be provided with a worksheet containing all cases who meet the targeting criteria instead of having the sample limited to 40.

**Reviewer Worksheets and Documentation**

As seen in Exhibit 8, the CTT worksheet provides identifying details, other potentially useful information, and blank columns for use by the reviewer for each student selected. The “Selection Reason” column gives the selection criteria (Exhibit 7) that led to flagging the student’s file. The header on the CTT worksheet provides information regarding the center and time period covered by the assessment, as well as the total number of cases meeting each of the targeting criteria.
Exhibit 8: Example of Career Technical Training Worksheet

In addition to the worksheet, reviewers will need to refer to several documents, both those requested prior to the review and those within the file. Exhibit 9 lists documents to be used during the assessment of CTT completion.

Exhibit 9: Documents to Use in the Career Technical Training Review

<table>
<thead>
<tr>
<th>Document</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Voc worksheet</td>
<td>This worksheet provides summary information on each student selected for review in the CTT completion sample, sorted by separation date. Pay particular attention to the Selection Reason column, as this gives an indication of potential problems that should be examined during the review. Use this worksheet to record the findings of the CTT completion review for each student.</td>
</tr>
<tr>
<td>All TARs in file, including Foundations (JT) TARs</td>
<td>TARs for each vocational program a student completed while enrolled in Job Corps should be included in the same location in each student’s file. There may be multiple TARs representing different trades or multiple levels of the same trade; in such cases all TARs present in the file should be reviewed. Reviewers should also be aware that many trades require a “Foundations” TAR (an O<em>Net code number ending in JT) that must be completed before completing the trade but does not on its own constitute a vocational completion. Failure to complete the JT TAR potentially invalidates all higher level TARs within that same trade/O</em>Net code.</td>
</tr>
<tr>
<td>Form ETA 6-40</td>
<td>Section 6.3 (R3) of the PRH requires that the ETA 6-40 report be in the file of each separated student. This form can be extremely useful</td>
</tr>
</tbody>
</table>
to reviewers because it contains details on students’ daily status that may be useful in assessing the validity of TAR/CTT completion. If an ETA 6-40 is not available in the student’s file, the reviewer must have access to CIS during the review in order to determine the student’s presence on center when TAR tasks/duties were completed and the date the TAR was signed off as complete by the instructor.

**Center’s SOP regarding the processing and updating of TARs**

In general, TARs should be updated and signed off as the student demonstrates the individual skills. In practice, however, many instructors update TARs periodically (e.g., weekly) and may sign off on numerous skills on the same day. Provided that this practice does not conflict with the center’s SOP, updating TARs in this fashion does not constitute a data integrity violation. However, if an instructor signs off on the TAR as completed (the first page of the TAR) after the student has separated from Job Corps, the TAR should be considered potentially invalid.

**Calendar of holidays and other non-training days**

This list, provided by the center, will help the reviewer determine if any items on the TAR were completed on non-training days. Task/duties completed on non-training days will result in a potentially invalid credit finding by reviewers (depending on the center’s sign off procedures for updating TARs).

**Versions of TARs used by center during the assessment period**

Reviewers should check to ensure that instructors are using the versions of the TARs provided by the center at the beginning of the assessment and that these are the appropriate versions (i.e., that they were current at the time the student was in the trade). If there are any questions about whether the center is currently using up-to-date TARs, current versions are available in the CTT section of the Job Corps Community Website. Additionally, with the implementation of new TARs, the reviewer should check the “Staggered Implementation Timeline” document available on the Web site above to ensure the center met the requirements for implementing new TARs.

**Supplemental Documents That May Be Useful**

**Case notes**

Case notes from instructors or other center staff can sometimes provide additional information on a student’s progress through a vocational program. They are sometimes printed and included in students’ personnel folders; in other cases they can be retrieved from CIS.

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**Validating a CTT Completion and Entering Notes**

Regardless of the selection reason, the assessment of CTT completion will include a check to determine that the student completed the correct version of the TAR for his or her particular vocation and an assessment of TAR completion. At a minimum, the following steps should be taken for each student’s file selected for review:

1. Confirm that there is a certified TAR on file for the trade listed as “Voc 1” on the Voc worksheet.
2. Confirm that the TAR on file is the correct version of the TAR for the vocation listed as “Voc 1” according to the student’s date of entry to the Job Corps program.

3. Check to see that the start and end dates on the front of the Voc 1 TAR match the start and end dates listed in the Voc worksheet. If you cannot locate the TAR that was entered into CIS (via the Voc 1 Begin and Voc 1 End dates), review additional TARs for the vocation listed as “Voc 1” in the student file to determine if any advanced level certified TAR for the vocation is available. See Exhibit 10 (below) for guidelines regarding Voc 1 Begin and Voc 1 End dates.

4. For trades that require both a “Foundations” (i.e., JT level) and an additional TAR (i.e., JA, JB, JC) for vocational completion, the reviewer will be required to confirm that both the JT and the higher level TARs are present in the student’s file, complete, and valid.

5. Confirm that any TARs certified as complete (including JT TARs) have all duty and task items dated, initialed by both the student and instructor, and rated at level 2 or 3. Note that it is acceptable if multiple ratings are circled. This implies that the instructor changed the rating of the student on this item as the student’s skills improved. Any TAR with one or more non-optional duties/task items left blank, with missing initials of instructor and/or student, undated, unrated, or with a final rating of “1” should be considered potentially invalid. See Exhibit 10 (below) for additional guidance regarding acceptable completion of TARs.

6. Confirm that the instructor finalized the TAR by checking the Completed box on the first page of the TAR and entering the date and/or completing the certification section on the last page of the TAR (see PRH Reporting Documentation section above).

7. Instructors may sign off on multiple items on the same day (e.g., at least once per week) provided this practice does not conflict with the center’s own SOP. However, any TAR with items signed off as complete after the student has been separated from the Jobs Corps program (and not returning) should be considered potentially invalid (refer to center’s SOP for TAR sign-off).

8. Even if the reviewer determines that an individual TAR is potentially invalid (e.g., because non-optional items were left blank or rated at level 1), the CTT credit itself still may be valid. The credit is potentially invalid only if valid TARs for that vocation cannot be found in the file.

Additional details on things to look for in the review of CTT completion and issues that may result in a determination of a potentially invalid credit are provided in Exhibit 10 (below).

After reviewing each student’s training records, the reviewer should enter notes (in the “Notes” column) in sufficient detail so that a third party looking at the worksheet after the visit will be able to understand what the reviewer found and how determinations were made. At the very least the “Notes” column should include:

June 23, 2010
• The O*Net code (number) of the TAR(s) reviewed (JA, JT, etc.) and found to be potentially invalid
• Whether or not the TAR(s) reviewed were found to be complete
• If the student was enrolled in Job Corps when the TAR was signed by the instructor as complete (and accounting for center’s SOP regarding instructor sign-off of completed TARs)

Additionally, any issues with the TARs that would lead to the credit being found potentially invalid should be included in the Notes column. In cases where the reviewer determines that a student had been granted a CTT completion inappropriately, the reviewer should mark an “X” in the “RO Dec: Invalid” column.

If the validity of the TAR is questioned, reviewers must also note the O*Net code from the front page of the TAR (in an O*Net code column of the worksheet, if available). If the TAR’s validity is supported, reviewers do not need to enter O*Net codes.

The reviewers also should note any Administrative Issues found during the review. Administrative Issues, such as noting well organized and documented files, loose papers/disorganization, and any other factors that did not result in potentially invalid credits but that should be brought to the attention of the center staff, should be included in a separate section in the final report.

After completing their review of all records in the vocational completion assessment sample, reviewers should take the following steps to consolidate and summarize their findings:

• If necessary, combine the separate Voc Excel worksheets used by different reviewers in a single file. This means copying and pasting entries in the “Invalid,” “Notes,” and O*Net code (if applicable) columns. Retain the original (separate) files each reviewer generated in case any data are lost due to errors while copying.
• Count the number of cases determined to be potentially invalid. This can be done on the Voc worksheet itself.
• In a separate document, summarize the causes for the potentially invalid findings and the number of potentially invalid credits associated with each cause. If there is a pattern that recurs within a particular trade, be sure to note this as well.
• Summarize any administrative findings (e.g., cases where the TAR seems to be valid but the start and end dates on the front do not match the dates in the Voc worksheet).
**Exhibit 10: Career Technical Training Review Issues**

<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard Review Tools</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Incomplete TAR</td>
<td>TARs in file</td>
<td>TARs that have pages missing or non-optional items are not dated, signed, or rated at level 2 or higher indicate a potentially invalid credit. If student does not have a fully documented vocational completion on file, the completion should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column.</td>
</tr>
<tr>
<td>TAR not certified on front or certification section not completed on new TARs</td>
<td>TARs in file</td>
<td>Even if the TAR appears otherwise complete (all duties/tasks items dated, signed, and rated at level 2 or higher), instructor failure to certify the TAR on the front page (including completion date and checking off Completed box), or complete the certification section on the last page of new TARs should be considered a potentially invalid credit and the reviewer should put an “X” in the “RO Dec: Invalid” column on the spreadsheet.</td>
</tr>
<tr>
<td>Start and end dates on TAR do not match dates in Voc worksheet</td>
<td>TARs in file, Voc worksheet</td>
<td>If the TAR appears otherwise complete (all non-optional items are dated, signed, and rated at level 2 or higher), a mismatch between the dates on the front of the TAR and those in the Voc worksheet does not necessarily imply a threat to data integrity or a potentially invalid credit. However, it is a record-keeping issue that should be noted on the spreadsheet and raised with center management. The reviewer should also check the other TARs in the file to see if the dates correspond to any other TAR.</td>
</tr>
<tr>
<td>Tasks signed off on by instructor on non-training days or days when the student was absent</td>
<td>TARs in file, ETA Form 6-40, calendar of holidays and non-training days</td>
<td>TARs should generally be signed off with the student present as the student demonstrates each skill. If the leave history shown in ETA Form 6-40 shows that the student was not present on dates that items on a TAR were signed off or if items were signed off on non-training days, the issue should be raised with center management. However, provided the pattern of signing off on TAR skills does not conflict with the center's SOP regarding maintenance of TARs, this does not constitute a data integrity violation or threaten the validity of the TAR in question. An exception that would cause a TAR to be found potentially invalid is if there are items that were signed off after the student had left the center entirely (e.g., AWOL separation from program). If this is the case and the TAR in question represents the student’s only (non-JT) vocational completion, the vocational completion should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column. <strong>NOTE:</strong> student sign off on completed TAR items is only valid if it occurs when he/she is present on center.</td>
</tr>
<tr>
<td>Issue</td>
<td>Standard Review Tools</td>
<td>Discussion</td>
</tr>
<tr>
<td>-------</td>
<td>-----------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Numerous tasks signed off on the same day</td>
<td>TARs in file, ETA Form 6-40</td>
<td>TARs should be signed off with the student present as the student demonstrates each skill. For some trades and some skills, it may be possible for a student to demonstrate several skills on the same day. However, in some cases the reviewer may notice an implausibly high number of tasks signed off on the same day. If observed, this issue should be raised with center management. However, provided the pattern of signing off on TAR skills does not conflict with the center’s SOP regarding maintenance of TARs, this does not constitute a data integrity violation or threaten the validity of the TAR in question.</td>
</tr>
<tr>
<td>Missing Foundations TAR, or Foundations credited as completion</td>
<td>TARs in file</td>
<td>In trades that require completion of a Foundations (JT-level) TAR in addition to at least one additional TAR (JA, JB, etc.), both the Foundations TAR and the subsequent TAR must be present, complete, and certified in order for the vocational credit to be considered valid. If either the Foundations TAR or a subsequent TAR is missing, the completion should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column.</td>
</tr>
</tbody>
</table>
FAQs Regarding Assessment of CTT Credits

1. Can a TAR be considered potentially invalid if correction fluid has been used to change dates/initials?

   Yes. Any change of dates that appears to be suspicious to the reviewer can lead to a finding of potentially invalid credit for the TAR. However, if the student has additional higher level TARs completed in the file, the reviewer should assess the additional TARs for completion before deeming the credit potentially invalid.

2. Can reviewers invalidate the TAR in question if the begin and end dates on the front page of the TAR do not match those in the CIS spreadsheet?

   If the TAR appears otherwise complete (all non-optional items are dated, signed, and rated at level 2 or higher), a mismatch between the dates on the front of the TAR and those in the Voc worksheet does not necessarily imply a threat to data integrity or a potentially invalid credit. However, it is a record-keeping issue that should be noted on the spreadsheet and raised with center management.

3. Can reviewers invalidate the TAR in question if tasks are signed off on by the instructor on non-training days or days when the student was absent?

   TARs should generally be signed off with the student present as the student demonstrates each skill. If the leave history shown in ETA Form 6-40 shows that the student was not present on dates that items on a TAR were rated and validated, or if items were rated and validated on non-training days, the issue should be raised with center management. If the pattern of approving TAR skills mastery does not conflict with the center’s SOP regarding maintenance of TARs, there is no data integrity violation to threaten the validity of the TAR in question (e.g., weekly sign-off of TARs). If the pattern of rating and validating TARs falls outside of center SOP, the overall validity of the TAR achievement should be questioned. Additionally, student sign off on completed TAR items is only valid if it occurs when he/she is present on center.

4. Is it acceptable if the teacher and student initial a task and then draw a line down the rest of the page?

   It is acceptable. The encouraged best practice is for both the student and the teacher to initial and date each task upon completion.

5. Is it acceptable to circle more than one rating per task?

   Yes, it is acceptable to circle more than one rating per task, as long as the student has shown improvement. The date the skill is certified should be the date that the student scored ≥2.
6. Is it acceptable if numerous tasks are signed off on the same day?

TARs should generally be signed off with the student present as the student demonstrates each skill. For some trades and some skills, it may be possible for a student to demonstrate several skills on the same day. However, in some cases the reviewer may notice an implausibly high number of tasks signed off on the same day. If observed, this issue should be raised with center management. However, provided the pattern of approving TAR skills acquisition (i.e., ≥2) does not conflict with the center’s SOP regarding maintenance of TARs (e.g., weekly sign-off of required duties/tasks) this does not constitute a data integrity violation or threaten the validity of the TAR in question.

7. Is it acceptable if the Foundations TAR is not complete but the advanced TAR in question is signed as completed?

In trades that require completion of a Foundations (JT-level) TAR in addition to at least one additional TAR (JA, JB, etc.), both the Foundations TAR and the subsequent TAR must be present, complete, and certified in order for the vocational credit to be considered valid. If either the Foundations TAR or a subsequent TAR is missing or incomplete (as outlined above), the completion should be considered potentially invalid.

**Tips/Best Practices for Assessment of CTT Credits**

1. Check center SOP to determine time limits for approving TAR completion (as well as acknowledgement of completed required duties/tasks).

2. Check the start date and Job Corps termination date for each student before beginning the review process.

3. Check the Voc Begin Date and Voc End Date to make sure they match the TAR on file. If not, note the date discrepancy in the “Notes” Column of the worksheet and review all other TAR(s) in the file for completion.

4. Check to make sure all mandatory (non-optional) tasks are dated, initialed by student and trainer, and have a rating higher than “1”. Failure to complete TARs in any of these ways makes the TAR achievement potentially invalid.

5. If appropriate, check to make sure that Foundations TAR (JT) is also complete. The Foundations TAR needs to be complete in order for the advanced TAR (JA, JB, etc.) to be complete.

6. If several tasks are signed off on the same date, check the tasks to see if all could have been performed on the same day (or approved according to the center’s SOP).

7. Check to make sure that correction fluid has not been used to correct errors on the TARs. There should only be a line through the date, initialed and dated to reflect change. Failure to comply should be reported in the “Administrative Issues” section of the record review.
and report unless the modifications may indicate an attempt to fabricate a student achievement. In this case, the TAR’s validity should be questioned.

8. Check to make sure all corrections (cross-outs) are initialed and dated. An erasure of information is not acceptable. Pencil markings and photocopies of TARs are not acceptable. Photocopies of TARs and those with cross-outs without instructor initials and date should be considered potentially invalid. This should also be communicated to center management.

9. If “Terminated Training” is marked, check to make sure the date indicated is when the student left the vocation training, not when the student separated from the Job Corps program (look for the last date of duty/task completion and then compare against SOP to make sure the termination (i.e., completion) date falls on the last duty/task completed date or within SOP).

6. Assessment of Student Leave

Purpose

The purpose of the audit of student leave is to ensure that centers are adhering to Job Corps policies regarding the use and documentation of student leave. These requirements are specified in PRH Exhibit 6-1, which reviewers should have available for reference during the audit (see Appendix 2).

Reporting and Documentation Requirements for Student Leave

PRH guidelines (dated 8/18/08) regarding reporting, documentation, and record keeping for student leave relevant to DIAs include (from section 6-1, R1 [b–f], R2, and R3 [a–e]; 6-3, R2 [f]).

6-1, R1. Student Attendance

Centers shall:

b. Report each student’s duty status in the Center Information System (CIS) using the guidelines shown in Exhibit 6-1, Duty/Pay/Leave Status Chart, and the procedures stated in the CIS documentation.

c. Document each pay/leave status change and the reason for such change in CIS.

d. Maintain documentation of duty status for a minimum of 3 years.

e. Establish and implement a system to encourage and promote regular attendance and identify and remediate chronic absences, missed appointments, and tardiness.
f. Monitor and document student attendance at off-center training activities, including work-based learning, off-center training (OCT), advanced career training (ACT), and other center-sponsored events.

6-1, R2. Authorized Absences

Centers shall:

a. Designate, in writing, staff members who are authorized to approve student leave and passes.

b. Grant breaks and leave to students based on the criteria shown in Exhibit 6-1. Note: Leave shall not be granted as a means of artificially postponing the student’s separation.

c. Approve leave or overnight passes for minor students only with the written consent of the minor’s parent or legal guardian. Pass consents must include, at a minimum, information specified on the Job Corps Parental Consent Form (see Forms section on the Jobs Corps Community web site).

d. Document all leave requested by students on a CIS leave request form. Each automated leave request form shall include justification, as appropriate, for the type of leave requested.

e. Authorize overnight passes with the following restrictions:
   1. Only for periods that do not conflict with scheduled classes.
   2. For minors, only to destinations authorized by written parental consent.

f. Report and maintain electronic copies of leave requests in CIS according to procedures shown in the CIS documentation and retain any supporting hard copy verification documentation in the student’s personnel file. Verification obtained from phone calls will be documented on the CIS leave form and will include: name of contact person, title, phone number, date of contact, and name and address of the facility.

6-1, R3. Unauthorized Absences

Centers shall:

a. Identify and report as AWOL any student who fails to return to or report within 3 hours after the student’s scheduled training day start time.

b. If a student who was identified and reported as AWOL contacts the center with a credible and verifiable explanation, the student’s status may be changed to the appropriate leave category, effective the date of contact and receipt of documentation to support the status change.

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c. If a student who was identified and reported as AWOL returns to or reports to the center more than 3 hours after the student’s scheduled training day start time with no credible or verifiable explanation, the student remains in AWOL status for that day. The student may, however, participate in regularly scheduled activities for that day. Document in CIS case notes the student’s scheduled training day start time and actual report time, and include a printout of the case notes in the student’s personnel folder.

d. Develop and implement procedures to locate and contact the student.

e. Document retrieval efforts in CIS case notes and include a printout of the case notes in the student’s personnel folder.

6-3, R2. Student Personnel File

f. All hard copy verification documentation supporting pay and leave status, including parental pass consent for minors. Leave requests shall be maintained electronically in CIS.

Sample and Selection Indicators

The Leave worksheet of the assessment samples file contains students meeting screening criteria that make them more likely than a randomly selected student to have data integrity issues with their granted leaves and AWOL days. All files meeting the screening criteria are entered into a pool for potential review. From this pool, files are randomly selected until 40 individual student files have been selected (the cap for review). It should be noted that student files may meet multiple selection/screening criteria; therefore, the number of files given as the “Total” in the Leave worksheet may be less than the sum of the students meeting each of the review criteria. The files are selected for review based on the selection criteria listed in Exhibit 11.
### Exhibit 11: Reasons for Inclusion in the Student Leave Sample

<table>
<thead>
<tr>
<th>Indicator Type</th>
<th>Indicator Code</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limit Violation</td>
<td>ADLV-P</td>
<td>Administrative Leave with Pay in excess of PRH limits of 5 training days in any consecutive 6-month period (extendable with RO approval)</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>ADLV-U</td>
<td>Administrative Leave without Pay in excess of PRH limits of 5 training days in any consecutive 6-month period (extendable with RO approval)</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PLV-P</td>
<td>Personal Leave with Pay in excess of PRH limits of 5 training days in the first 6 months of enrollment plus any additional accumulated paid personal days</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PLV-U</td>
<td>Personal Leave without Pay in excess of PRH limits of 5 training days during enrollment</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PLV- No Dep</td>
<td>Questionable use of Personal Leave without Pay: student with no dependents recorded is granted PLV-U</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>BERV</td>
<td>Bereavement Leave in excess of PRH limits of 10 training days per 12 months of enrollment</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>AWOL 6</td>
<td>Student was in AWOL status for 7 or more consecutive training days without being separated on the 7th day (3 hours after student’s scheduled training day start time). The PRH specifies that students with 6 consecutive AWOL training days must be separated on their 7th consecutive AWOL training day.</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>AWOL 12</td>
<td>Student was in AWOL status for 13 or more training days in a 6-month period without being separated on the 13th day (3 hours after student’s scheduled training day start time). The PRH specifies that students with 12 AWOL training days in any 6-month period must be separated on their 13th AWOL training day (within the same period).</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PDOF-HWBL</td>
<td>Present for Duty Off Center for Work-Based Learning in excess of PRH limits of 6 weeks (30 training days) per enrollment (extendable with RO approval)</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PDOF-CAR</td>
<td>Present for Duty Off Center for Career Related Activities in excess of PRH limits of 10 training days per enrollment (extendable with RO approval)</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PDOF-EMER</td>
<td>Present for Duty Off Center for Firefighting and Emergency Services in excess of PRH limits of 8 weeks (56 calendar days) per year of enrollment</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PDOF-MISC</td>
<td>Present for Duty Off Center for Miscellaneous Center Activities in excess of PRH limits of 10 training days per enrollment</td>
</tr>
<tr>
<td>Limit Violation</td>
<td>PDOF-ADM</td>
<td>Active Duty Military in excess of PRH limits of 8</td>
</tr>
</tbody>
</table>
As noted in Exhibit 11, 13 of the 17 selection indicators concern what appear from student pay records to be violations of PRH policy with respect to maximum number of training days allowed in a specific leave status. The other indicators indentified as “Pattern” indicators do not imply a specific violation of PRH policy, but instead flag those students with instances of unusual patterns in their pay records such as frequent changes between leave and AWOL or issues surrounding PDOF leave periods. The PRH states that centers should not use leave to extend a student’s length of stay, and the reviewer should keep this in mind when reviewing the pattern indicators above.

While the total number of students in the sample is capped at 40, the information from the review can give an indication of how widespread the problems found during the assessment are in the center’s larger population. Upon request, reviewers can be provided with a worksheet containing all cases who meet the targeting criteria instead of having the sample limited to 40.

**Reviewer Worksheets and Documents**

As seen in Exhibit 12, the header on the Leave worksheet gives information regarding the sample and center, such as the time period covered by the assessment and the total number of cases meeting each of the targeting criteria. Additionally, the sheet contains blank columns for the reviewer’s use during the review. As with other worksheets, the “Selection Reason” provides the selection indicator code so the reviewer knows why the particular file was pulled for review.
**Exhibit 12: Example of Student Leave Worksheet**

<table>
<thead>
<tr>
<th>L</th>
<th>Student ID</th>
<th>Last Name</th>
<th>First Name</th>
<th>Enrollment Date</th>
<th>Term, Date</th>
<th>LOS</th>
<th>Freq Enrl Age</th>
<th>Reason</th>
<th>Selection Reason</th>
<th>Earlier Term Date</th>
<th>Number of Unexcused Days</th>
<th>Dates of Unexcused Days</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>5/6/2006</td>
<td>9/14/2006</td>
<td>101</td>
<td>17 NR</td>
<td>AWOL</td>
<td>Pnmt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>12/01/2007</td>
<td>4/15/2008</td>
<td>129</td>
<td>19 Res</td>
<td>Disc</td>
<td>Pnmt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>1/22/2008</td>
<td>7/24/2008</td>
<td>68</td>
<td>19 NR</td>
<td>AROL</td>
<td>Pnmt</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>xxxxxxx</td>
<td>8/14/2007</td>
<td>7/1/2009</td>
<td>252</td>
<td>19 Res</td>
<td>Disc</td>
<td>AOL VLI</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

To assist reviewers in the review of leave records, the samples file also includes the Leave Records worksheet, which contains the detailed pay and leave status history for each student in the leave sample, as shown in Exhibit 13. The information on the Leave Records worksheet should correspond with the student’s ETA 6-40 and the student’s Daily Status in the CIS (Daily Status tab in Student Information section). This worksheet also includes a count of the total days and training days in a given pay status. The “Unexcused Days” column of the Leave Records sheet may be used by reviewers to keep track of days determined to be unexcused.
Exhibit 13: Example of Student Leave Records Worksheet

<table>
<thead>
<tr>
<th>Student ID</th>
<th>Last Name</th>
<th>First Name</th>
<th>Term. Date</th>
<th>Pay Status</th>
<th>Leave Reason</th>
<th>Days in Pay Status</th>
<th>Training Days</th>
<th>Start Date</th>
<th>End Date</th>
<th>Unexcused Days</th>
<th>Notes</th>
</tr>
</thead>
</table>

In addition to the worksheets, reviewers will need to refer to several documents and/or information stored within the CIS. Exhibit 14 lists documents to be reviewed during the assessment of student leave.
## Exhibit 14: Documents to Use in Student Leave Review

<table>
<thead>
<tr>
<th>Document</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Leave worksheet</td>
<td>This worksheet provides summary information on all the students in the leave sample, sorted by separation date. Pay particular attention to the selection reason, as this gives an indication of potential problems that should be examined during the review. Use this worksheet to record the findings of the leave review for each student. (See example in Exhibit 12.)</td>
</tr>
<tr>
<td>Leave Records worksheet</td>
<td>This worksheet lists the daily pay status for each student in the leave sample. It can be used during the review to identify leave days for which the student’s file should contain leave request forms and to calculate when a student has exceeded the PRH-specified maximum number of days in any status. Note that the start and end dates for each status are inclusive. Also be aware that the number of training days given may over-count the actual number of training days. This is because the training days given on this worksheet exclude student-specific non-training days into account (e.g. alternate summer/winter breaks). (See example in Exhibit 13.)</td>
</tr>
<tr>
<td>Leave request forms</td>
<td>These should be found within the CIS and may be found in hardcopy within the file. There should be a leave request form corresponding to every day of leave listed in the Leave Records worksheet. Reviewers check the leave request forms for completeness, consistency, and compliance with PRH leave policy.</td>
</tr>
<tr>
<td>AWOL contact record</td>
<td>This documents the center’s efforts to contact the student during AWOL periods and can be found in either hardcopy form in the student’s file or within the CIS in the Case Notes section. In some cases, this information may provide additional information that helps reviewers understand a student’s leave history.</td>
</tr>
<tr>
<td>PRH Exhibit 6-1 (Duty/Pay/Leave Status Chart)</td>
<td>This table, which is given in Appendix 2, provides the acceptable reasons and required documentation for each pay status, as well as the maximum number of training days allowed in each status. Reviewers should have this document available to use as a reference. (PRH Exhibit 6-1 dated 8/18/08)</td>
</tr>
<tr>
<td>Center’s SOP regarding leave</td>
<td>This is used to make sure that the center is following its own procedures regarding student leave as well as PRH requirements. In addition, the SOP should give the name(s) of the person responsible for approving student leave.</td>
</tr>
<tr>
<td>ETA 6-40 Report</td>
<td>Section 6.3 (R3) of the PRH requires that the ETA 6-40 report be in the file of each separated student. This form can be extremely useful to reviewers because it contains details on students’ daily status.</td>
</tr>
</tbody>
</table>

### Supplemental Documents That May Be Useful

<table>
<thead>
<tr>
<th>Supplemental Document</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Case Notes</td>
<td>Case Notes from counselors or other center staff can sometimes provide additional information on a student’s situation or use of leave. They are sometimes printed and included in students’ personnel folders, or the notes can be accessed in the Case Notes section of the CIS.</td>
</tr>
<tr>
<td>Calendar of holidays and other non-training days</td>
<td>This list, either provided by the center or available for review within the CIS (System Functions section), will help the reviewer confirm that the count of training days on the Leave Records worksheet is accurate. Because the samples take these days into account in calculating training days, reference to this calendar serves as a manual double-check.</td>
</tr>
<tr>
<td>Morning Report</td>
<td>In cases where the information on the Leave Records worksheet and within the CIS conflict or where there is reason to doubt the information from either source, the Morning Report for the day in question may provide information that can help resolve the issue. Morning Reports can be requested from center management or retrieved from the CIS.</td>
</tr>
</tbody>
</table>
Using the Center Information System to Review Student Leave

Per the PRH requirements, all leave requests should be complete and available electronically in the CIS. Additionally, center staff now have the ability to enter leave verification information obtained via telephone directly onto the leave request within the CIS. With the increased use of the CIS to review student leave, reviewers should be familiar with the following sections within the CIS:

- Reviewers should be able to access the CIS, choose a center, and use the Student Look Up function to pull up information for individual students.
- The Leaves tab within the CIS Student Information section provides information on the leave requests (and any obtained verification information) for each period of leave for an individual student.
- The Daily Status tab within the CIS Student Information section provides information on the day-to-day status of the student during his or her enrollment (includes regular pay statuses, AWOL days, and leave periods).
- The Case Notes section provides the notes entered in the CIS by the center staff regarding the student’s activity on center. The Case Notes section is useful to reviewers when attempting to locate AWOL follow-up documentation by counselors and supplemental information regarding other instances of leave such as PDOF.
- The Work-Based Learning Report within the Training section of the CIS can provide details on the student’s home-based or center-based learning as well as CTT.

Appendix 3 contains directions and screenshots for accessing each of the above sections/tabs of the CIS. Additional information and trainings on the CIS are available via the Job Corps SIMON Web site at: https://simon.jobcorps.org (a Citrix ID and password are required).

Validating Student Leave and Documenting Findings: General Process Guidelines

The assessment of student leave is conducted to ensure that centers adhered to the PRH policies for granting and documenting student leave. During the assessment, the reviewer ensures that each period of leave in the student file has a valid leave request and verification information entered in the CIS and/or a signed hardcopy leave request with corresponding documentation in the student file. This will help ensure that leave was granted according to criteria and AWOL follow-up by the counselor was documented.

When conducting the leave assessment, reviewers will look for days that are determined to be potentially “unexcused.” The term “unexcused days” generally refers to days where there is insufficient evidence to support the center’s granting of leave, where leave was granted inappropriately, or any days following a date on which the reviewer determines that a student should have been separated due to AWOL. In general, only training days may be considered unexcused days, however, if the reviewer determined that an earlier AWOL separation date applied, the unexcused days may be training and non-training days.

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Following the review of each leave and AWOL period detailed on the Leave Records worksheet, the reviewer should document the findings on the worksheet using the procedures listed below:

- Note all findings on the Leave Records worksheet for each period in a status other than On Center. A note indicating that the leave period is valid (such as a check mark or “ok”) should be included when no problems are found.
- Training days corresponding to leave instances that the reviewer determines to be insufficiently documented or inappropriately granted should be considered unexcused days, tallied, and noted on the Leave worksheet (this information will be transferred from your Leave Records worksheet as that is where line-by-line record review information will initially be recorded).
  - Enter in any earlier separation dates in the “Earlier Term Date” column of the Leave worksheet.
  - Tally all unexcused days (for the specific student file) and enter the total in the “Number of Unexcused Days” column of the Leave worksheet. This total will include the unexcused days between an earlier separation date and the actual separation date if a reviewer has determined the student should have been AWOL separated at an earlier date (this can be calculated by subtracting the “Earlier Term Date” column from the “Term Date” column).
  - List the dates of the unexcused days in the “Dates of Unexcused Days” column of the Leave worksheet and enter notes in sufficient detail to enable a third party looking at the worksheet after a review to understand what the reviewer found and how he or she made the determination. Examples of appropriate note detail:
    - For the Bereavement period of 4/23/08–4/28/08, neither the student’s file nor CIS contains supporting documentation or evidence of verification to support the granting of leave (death of student’s grandmother). All other leave verified. AWOL follow-up documentation by counselor in file.
    - Leave verified. File contains AWOL follow-up documentation by counselor.

At a minimum, the following steps should be taken for each student’s file selected for review:

- Confirm that a valid leave request (appropriate dates, appropriate leave category, and approval signatures following center’s SOP guidelines) is available for each period of leave a student has been granted. Leave requests must be accompanied by supporting documentation that provides adequate information regarding the student’s leave and supports the granting of leave within the specified leave category per the PRH Exhibit 6-1 (e.g., if a student has been granted Bereavement leave, the documentation/verification should support granting that category of leave):
  - Leave requests must be reported and maintained within CIS (additional hardcopies may be found in the student’s file); documentation to support the leave may be in hardcopy and included in the student’s file or, if verification was made via phone call by a counselor, the verification information (name of contact person, title, phone number, date of contact, and name and address of the facility) may be entered directly
on the leave request in the CIS. While the student is required to have an approved and valid leave request in CIS, the supporting documentation can either be in the file or entered into CIS; reviewers must check both places for supporting documentation/verification.

- If a reviewer determines that a student should have been AWOL separated from the program at an earlier date, both training days and non-training days will be included in the total count of unexcused days.

- Confirm that the student file, or the Case Notes within the CIS, documents the counselor’s contact with the student during AWOL periods.

- If a reviewer finds that leave was granted inappropriately for a specific period, and has found additional documentation in the file or within the CIS indicating that the student may have been AWOL for any part of the leave period, the reviewer should convert the days in question to AWOL days and do a recount of AWOL days to determine if the student should be given an earlier term date.

- Even if a student record has not been selected for review due to AWOL 6 or AWOL 12 violations, should the reviewer encounter a leave history with multiple AWOL periods, an AWOL count should be done to make sure the student should not have been AWOL separated from the program at an earlier date.

- Students given passes for the weekend (On Pass) should not have weekdays included in the pass dates of departure and return unless the weekend includes a holiday period. However, since many centers allow the students to leave after the training day on Fridays, many passes will reflect a 3-day window. The reviewer should review passes for 3 days or more to ensure training days were not included in the weekend pass.

- Reviewers should note that while information provided in the Case Notes section of the CIS is useful, the Case Notes information cannot be used to validate a leave request or as documentation to support the granting of leave. Information to support leave must be entered directly into the CIS leave request form and/or found in hardcopy form in the student’s file. If center staff has noted telephone contact with an individual confirming the student’s absence, the information should be entered directly on the leave request in CIS and not only documented in Case Notes.
Merging and Summarizing Findings Among Reviewers

If multiple reviewers have assessed student leave records for one center, merging the worksheets of all the reviewers into one Leave worksheet and one Leave Records worksheet will be necessary. While worksheets can traditionally be merged using the functions in Excel, there is no guarantee this function will neatly and correctly merge all of the data into one sheet. It is highly recommended that one person copy and paste entries by hand into one worksheet. The original files for each reviewer should be retained in case any data are lost due to copying.

For the report, reviewers should focus on identifying any patterns of unexcused days seen across the student sample. The patterns should be categorized with counts of the number of files with the particular pattern seen recorded in the report. For example:

The reviewers examined the leave records of 40 students (of 68 that met selection criteria) selected through targeted sampling and found problems with 27 student records, resulting in 152 potentially unexcused days. The following is an overview of the main problems found with Acme’s leave records:

- **AWOL separated from the program at an earlier date**
  - In four files, the students reached the AWOL limit (AWOL-12) and should have been AWOL separated from the program at an earlier date (resulting in an earlier term date for the student). Thirty-five days were taken as a result of the earlier termination dates.

- **No documentation to support granting of leave**
  - In 12 files, supporting documentation was missing for periods of ADLV-P or ADLV-U. Typically, the file was missing sufficient documentation to support medical leave.

Additionally, reviewers should identify and quantify any administrative findings. These are technical violations of PRH guidance that do not result in a determination of unexcused days. Typical administrative findings are failure to document AWOL retrieval efforts and student inappropriately remaining in AWOL status over summer and winter breaks. It is also important to note any positive findings related to the center’s documentation and file keeping.

The following table identifies some potential issues a reviewer may encounter while assessing student leave.
### Exhibit 15: Student Leave Review Issues

<table>
<thead>
<tr>
<th>Issue</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>AWOL in excess of PRH limit without being separated</td>
<td>Especially for those cases selected via the AWOL 6 or AWOL 12 criteria, the reviewer should count the AWOL training days and determine if the student exceeded the limit of 6 consecutive training days or 12 training days in 6 months without being separated. Additionally, if the reviewer determines that in one or more instances, leave was granted inappropriately, and the files contain evidence that the student would have been or was in AWOL status, these days should also be considered AWOL days and counted in the total when determining the separation date. If it is determined that a student should have been AWOL-separated at an earlier date, note this in the “Earlier Term Date” column. All days of enrollment after this date (both training days and non-training days) should be considered unexcused days and noted in the “Dates of Unexcused Days” column.</td>
</tr>
<tr>
<td>Leave in excess of PRH limits</td>
<td>The reviewer should count the training days in the applicable category (Limit Violations) and determine if the student exceeded the applicable limits for that category of leave. Any training days in excess of the limit should be considered AWOL for the purposes of calculating an earlier AWOL separation date if the reviewer has information within the file or the CIS to indicate the student would have been AWOL if he or she had not been granted leave.</td>
</tr>
<tr>
<td>Missing leave request</td>
<td>In cases where the reviewer cannot find any leave request form corresponding to a leave period specified on the Leave Records worksheet, check ETA Form 6-40 and the CIS to make sure that the same leave period is recorded there. If so, these leave days should be considered unexcused days and noted in the “Dates of Unexcused Days” column. All leave requests should be documented electronically in the CIS.</td>
</tr>
<tr>
<td>Inadequately justified leave</td>
<td>In cases where the reviewer determines that leave was granted for a reason that does not comply with the acceptable reasons given in PRH Exhibit 6-1, these leave days should be considered unexcused days and noted in the “Dates of Unexcused Days” column.</td>
</tr>
<tr>
<td>Insufficiently documented leave</td>
<td>In cases where the reviewer determines that the documentation given in the leave request form is insufficient for the leave category and no additional supporting documentation can be found, these leave days should be considered unexcused days and noted in the “Dates of Unexcused Days” column.</td>
</tr>
</tbody>
</table>

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<table>
<thead>
<tr>
<th><strong>Issue</strong></th>
<th><strong>Discussion</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Inappropriate backdating of leave status or inappropriate extensions of leave</td>
<td>In cases where it appears that a student has been granted leave retroactively or been granted a leave extension inappropriately, these leave days should be considered unexcused days and noted in the “Dates of Unexcused Days” column. This typically happens when counselors trying to retrieve AWOL students request a change in status from AWOL to ADLV-U prior to the point of contact with the student or extend a leave period to prevent a student from going into AWOL status despite having had no additional contact with the student.</td>
</tr>
<tr>
<td>Inappropriate retroactive change of status</td>
<td>Any retroactive changes to a student's status (e.g., from AWOL to ADLV-U) require approval from both the center director (designee) and the Regional Office. If the reviewer finds any evidence of retroactive changes in student status without evidence of this approval, these days should revert to their earlier status and be considered unexcused days.</td>
</tr>
<tr>
<td>Indeterminate student status</td>
<td>If the reviewer cannot determine the true status of a student for a particular period of time due to conflicting information within the CIS and the student file, the reviewer should consider these days as unexcused and note them in the “Unexcused Days” column on the Leave worksheet.</td>
</tr>
</tbody>
</table>

**FAQs Regarding Assessment of Student Leave**

1. What happens if a leave request for a specific period of leave is not in the CIS?

   The leave period should be considered unexcused days. All leave periods must be reported and maintained in the CIS. A hardcopy leave request in the student file cannot substitute for a request within the CIS.

2. If the file does not contain supporting documentation for a leave period, is it unexcused?

   If the reviewer cannot find either supporting documentation within the file or verification information entered directly on the electronic leave request in the CIS (in the Comments section) the leave period should be considered unexcused. Reviewers should keep in mind that supporting verification must be entered onto the leave request in the CIS or hardcopy documentation must be in the file.

3. If a student exceeds the PRH limits for a particular leave category, and from the information in the file and within the CIS it appears the student would have been AWOL on these days had they not been granted the excess leave, how are these days treated?

   If the reviewer can determine that a student would have been in AWOL status had they not been inappropriately granted leave beyond the PRH limits, the reviewer should convert the days to AWOL days and do a count of all AWOL days to make sure the student should not have an AWOL 6 or AWOL 12 separation.

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**Tips/Best Practices regarding Assessment of Student Leave**

1. Since each student file has been selected for a particular reason(s), either unusual leave pattern or limit violation(s), it is best to start with this issue (or issues) first. For example, if a student has been selected for review because it appears the student was granted Administrative Leave with Pay (ADLV-P) in excess of PRH limits, the review of records should begin with all ADLV-P periods. For unusual leave patterns, reviewers should identify leave records (typically clustered) where the student was on and off center in a short period of time or had single days in On Center status. Reviewers should keep in mind that just because a record has been selected for review, it does not mean that the leave will certainly be invalid.

2. If a reviewer cannot determine where a student was or why the student was granted leave, then the leave period should be considered unexcused.

3. On the Leave Records Excel worksheet, highlight (using the borders and shading tool) the beginning line and end line of each student’s leave record to help distinguish one student record section from the next.

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**7. Assessment of Student Placement**

**Purpose**

The goal of the CTS placement assessment is to confirm that the CTS agency responsible for the center’s CTS placement services has adhered to Job Corps policy in claiming CTS placement credits for graduates and former enrollees. These requirements for placement credits are detailed in Chapter 4 of the PRH; section 4.5 and Exhibits 4-1 and 4-2 are especially relevant to the assessment of placements.

**Reporting and Documentation Requirements for CTS Placements**

PRH guidelines (dated 10/1/09) regarding reporting, documentation, and record keeping for CTS placement verification relevant to data integrity assessments include (from section 4.5, R3):

**R3. Verification**

Centers or other designated CTS providers shall:

a. Verify and document 100% of initial placements (subsequent placements will be verified through the third-party 6-and 12-month follow-up process).

b. Obtain placement verification documentation as specified in Exhibit 4-2 (Placement Verification and Documentation Requirements). Placements shall be considered verified when such documentation is obtained.
c. Placements must be verified and reported to the Job Corps Data Center through the national, automated system within 90 days after the placement requirements have been met.

d. Maintain documentation of all placement verification for 3 years.

Sample and Selection Indicators

The CTS sample files contain three worksheets: Instructions, Placement, and Review List. As with the center-based sample files, the Instructions page offers brief summary guidance, and the Review List is intended to be presented to the agency prior to the assessment or Regional Office review so they can retrieve the records of the targeted students.

Similar to the center-based samples, the CTS agency assessment samples file contains students that meet selection criteria that make them more likely to have data integrity issues with their post-separation placement. The header on the Placement worksheet gives information regarding the CTS agency and time period covered by the assessment, as well as the total number of cases meeting each of the selection criteria. Note that because students may be selected for more than one reason, the “Total” number of (individual or unique) students selected may be smaller than the sum of the students meeting each of the individual criteria.

Students listed in the Placement worksheet have been reported as placed by the CTS agency and have a date reported or placed falling within the time period covered by the samples. The students are sorted by Date Reported (i.e., the date they began their job, service, school, or training). The specific selection criteria for the students listed on the Placement worksheet (“Selection Reason” column) are listed in Exhibit 16.

June 23, 2010
Exhibit 16: Reasons for Inclusion in the Placement Sample

<table>
<thead>
<tr>
<th>Selection Reason</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qplace</td>
<td>The student provided information during the 13-week survey that conflicted with information reported by the agency and caused the placement to be in doubt. The information given by the student is given in the &quot;QP Reason Given by Student&quot; column.</td>
</tr>
<tr>
<td>Qwage</td>
<td>The student reported a wage during the 13-week survey that was at least $1.00 lower than that reported by the agency. The wage reported by the student is given in the &quot;Wage Reported by Stdnt&quot; column.</td>
</tr>
<tr>
<td>Late</td>
<td>The student was placed in the last week (former enrollees) or 2 weeks (grads) of their placement window (3 and 6 months respectively).</td>
</tr>
<tr>
<td>Qbus</td>
<td>The student had a residence address or phone number identical to that of the employer reported on the placement verification form.</td>
</tr>
<tr>
<td>Domestic</td>
<td>The student had a job title containing a word such as “baby,” “child,” “care,” “dish,” “lawn,” or “yard.”</td>
</tr>
</tbody>
</table>

As seen in Exhibit 17, the Placement worksheet provides identifying details, other potentially useful information, and blank columns for use by the reviewer for each student selected. As with the center-based samples, the “Selection Reason” column gives the selection criteria that caused the student’s name to be selected. These criteria correspond to the definitions given in Exhibit 16. Exhibit 18 lists documents to be used during the assessment of placements.

Exhibit 17: Example of Placement Worksheet

June 23, 2010
### Exhibit 18: Documents to Use in the Placement Review

<table>
<thead>
<tr>
<th>Document</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Placement Worksheet</td>
<td>This worksheet provides summary information on all the students in the Placement sample, sorted by date reported. Pay particular attention to the “Selection Reason” column, as this gives an indication of potential problems that should be examined during the review. Use this worksheet to record the findings of the placement review for each student.</td>
</tr>
<tr>
<td>Placement Verification Form(s)</td>
<td>This form is filled out by the employer or educational institution and contains the information entered into the CTS database by CTS specialists. Reviewers should check to verify that (1) the information on this form matches that in the Placement worksheet and on Form ETA 6-78, (2) the placement meets the definition given in PRH Exhibit 4-1 based on the information given on the verification form, and (3) the form meets the documentation requirements specified in PRH Exhibit 4-2. When reviewing these forms, look for details such as a fax banner or employer’s stamp, which provide additional assurance that the form in fact originated from the stated source. Note that a pay stub or printout from The Work Number© Web site may serve in lieu of the verification form as long as it contains all the required information (hours worked per week, wages paid, etc.) and that there are different documentation requirements for self-employed students. Copies of all documentation should be in the file.</td>
</tr>
<tr>
<td>Supporting documentation (if applicable)</td>
<td>In addition to the placement verification form, CTS records frequently contain supplemental supporting documentation such as pay stubs, business cards, or printouts from The Work Number© Web site. This supplemental documentation can provide additional assurance that the placement is valid.</td>
</tr>
<tr>
<td>Form ETA 6-78 Placement and Assistance Record (ETA 6-78)</td>
<td>Form ETA 6-78 provides detailed information on the placement and who approved it, which should match the information contained in the Placement worksheet and verification form. If this form is not in a student’s file, reviewers can retrieve it from CIS if they feel that reference to it will help assess the placement.</td>
</tr>
<tr>
<td>Supplemental Documents That May Be Useful</td>
<td></td>
</tr>
<tr>
<td>Form ETA 6-40</td>
<td>Section 6.3 (R3) of the PRH requires that the ETA 6-40 report be in the file of each separated student. It can be useful to reviewers if issues in a student’s placement case raise questions about their Job Corps enrollment (e.g., separation type, trade). The ETA 6-40 can be retrieved from CIS if the document is not in the student’s file.</td>
</tr>
<tr>
<td>Case notes</td>
<td>Case notes from CTS placement specialists may provide additional information on a student’s placement. They are sometimes printed and included in students’ personnel folders; in other cases, they can be retrieved from CIS if necessary.</td>
</tr>
</tbody>
</table>

June 23, 2010
Valid Career Transition Services Placements

To conduct the review of placements, it is essential that the reviewer have a copy of PRH Exhibit 4-1 and 4-2. Each type of placement has specific requirements for verification. Descriptions included here are only providing an overview of those requirements. Additionally, placement windows are different for graduates and former enrollees. Graduates separating from the program prior to October 1, 2009 had a CTS placement window of 6 months; former enrollees had a CTS placement window of 3 months. Graduates separating from the program after October 1, 2009 had a CTS placement window of 9 months; former enrollees continued to have a placement window of 3 months. Reviewers must identify the date the student separated from the program prior to the CTS review in order to determine the appropriate placement window for the student.

However, regardless of the reason for selection for review, the assessment of placements should include, at a minimum, the following steps for each student selected for review:

- Check the placement verification form to make sure that the information confirms the placement listed on the Placement worksheet: that the placement meets the definition given in PRH Exhibit 4-1: and that the form meets the documentation requirements given in PRH Exhibit 4-2. Specific requirements vary by the type of placement (i.e., part-time job, full-time job, education, training, or military), but in all cases the documentation and verification information must include the date the student reported to the placement (i.e., date reported); the date the student met the Job Corps’ placement criteria (i.e., date placed); the date of verification; and the name, title, and phone number of the person who provided the information. Additional requirements depend on the type of placement:
  - Job and military placements must include the date the student met the placement definition (i.e., date placed—the date the student worked at least 32 hours [full time] or 20 hours [part time] in one or more jobs or 40 hours per week for a military placement), the student’s wage, and the number of hours the student worked in the preceding week.
  - Educational and training verifications must include the number of credit hours for which the student is enrolled or the number of training hours per week and the expected duration of the class or training. To be considered a valid placement, the student must be enrolled in 9 credit hours or 20 hours per week for an academic semester or quarter, or in a training program with an expected duration of at least 90 days.
  - Combination placements must meet the documentation requirements of both the job and educational placement for the same 1-week period at the number of hours specified in Exhibit 4-1.

- Review any supplemental information such as pay stubs or printouts from The Work Number® job verification Web site. These are acceptable forms of documentation for job placements in lieu of a placement verification form provided they include both the number of hours worked in a 1-week period and the wage the student earned.

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• Especially for cases where the selection reason is “Late,” confirm that the date placed falls before the end of the student’s active placement window. Recall that placement windows changed for graduates separating after October 1, 2009, from a 6 month placement window to a 9 month window (former enrollees continued to have a 3 month window based on the 2005 change). Note, however, that the placement window for eligible students who separated as medical separations with reinstatement rights (MSWR) does not begin until the student’s close-out occurs. The close-out date may be either during their 180-day reinstatement period (MSWR Early Close-out date) or at the end of their 180-day reinstatement period (MSWR Close-out date). The close-out date typically occurs at a later date than the student’s separation date.

• Review the information on ETA form 6-78 to confirm that it matches the information given on the placement verification form and the Placement worksheet and that the placement has been approved by an authorized individual.

• If the information given on the placement verification form indicates that the placement did not meet the definition given in Exhibit 4-1 or if the information given is insufficient to verify the placement, it should be considered potentially invalid.

• In some cases, case notes from the CTS specialist may provide additional information that could help clarify questions the reviewer has regarding the placement. For example, it may help the reviewer determine that a student who claimed not to have heard of the listed employer during the 13-week survey did so because they were familiar only with the “doing business as” (DBA) name, not the corporate name.

• In addition, the reviewers should verify that the placement verification form(s) in use by the agency are designed so that they can efficiently collect all of the required information. If there is a standardized form or set of forms in use in the region, the reviewer should confirm that the agency is using the correct version of these forms.

Reviewer Worksheets and Documents

After reviewing each student’s training records, the reviewer should enter sufficient notes in the “Notes” column that a third party looking at the worksheet after the visit will be able to understand what the reviewer found and how he or she made the determination. At a minimum, the “Notes” section should include the following:

• The type of placement reviewed
• Whether or not the placement is potentially invalid
• Reasons the reviewer found the placement to be potentially invalid

Additionally, in cases where the reviewer determines that the agency has claimed a placement that did not meet the definition or satisfy documentation requirements, the reviewer should mark an “X” in the “RO Dec: Invalid” column.

Additional detail on things to look for in the placement review and issues that may result in a determination of a potentially invalid credit is provided in Exhibit 19 (below).
After completing their assessment of all records in the placement sample, reviewers should take the following steps to consolidate and summarize their findings:

- If necessary, combine the separate Placement Excel worksheets used by different reviewers in a single file. This means copying and pasting entries in the “Invalid” and “Notes” columns by hand. Retain the original (separate) files each of the reviewers generated in case any data are lost due to errors while copying.

- Count the number of cases determined to be potentially invalid. This can be done on the Placement worksheet itself.

- In a separate document, summarize the causes for the potentially invalid findings and the number of potentially invalid credits associated with each cause. If there is a pattern that recurs with a particular type of placement or with a specific CTS specialist, note this as well.

- Summarize any administrative findings (e.g., routinely reporting the incorrect date as the date reported, use of outdated or confusing placement verification forms).
# Exhibit 19: Career Transition Services Review Issues

<table>
<thead>
<tr>
<th>Issue</th>
<th>Standard Review Tools</th>
<th>Discussion</th>
</tr>
</thead>
<tbody>
<tr>
<td>No verification form and/or documentation in the file</td>
<td>Placement worksheet</td>
<td>If the reviewer determines that the file does not contain documentation verifying the claimed placement, the placement should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column.</td>
</tr>
<tr>
<td>Verification form does not contain all required information</td>
<td>Placement worksheet, placement verification form, PRH Exhibit 4-2</td>
<td>In general, if the verification form or pay stub does not contain all of the required information specified in PRH Exhibit 4-2, the placement should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column. However, the placement may be considered valid if the missing information is provided by supporting documentation contained in the folder or if the existing documentation provides the reviewer with sufficient assurance that the placement is in fact valid.</td>
</tr>
<tr>
<td>Dates on verification form do not match dates in Placement worksheet or ETA Form 6-78</td>
<td>Placement worksheet, placement verification form, ETA Form 6-78</td>
<td>If the date the student reported to his or her job/school/training listed on the verification form is different from the date reported listed on the Placement worksheet or ETA Form 6-78, this may not be sufficient cause to consider the placement potentially invalid. Pilot assessments to date have found that many agencies do not understand that “Date Reported” refers to the date the student actually began their job/school/training and instead routinely enter the beginning of the 1-week period when the student met the placement definition. If discovered, this issue should be raised as an administrative finding in need of correction but would not threaten an otherwise valid placement.</td>
</tr>
<tr>
<td>Verification form signed prior to the date placed</td>
<td>Placement worksheet, placement verification form</td>
<td>In some cases, employers or institutional officials may sign a verification form prior to the student completing the 1-week period when he or she is expected to meet the placement definition. These placements should be considered potentially invalid unless there is further documentation confirming that the student worked or attended the required number of hours of work/school/training during the week in question as expected. An example of an invalid placement would be a military placement that contains documents from the recruiting office showing that the student committed to service but does not provide follow-up documentation showing that he or she reported for duty as scheduled and completed the first week.</td>
</tr>
<tr>
<td>Issue</td>
<td>Standard Review Tools</td>
<td>Discussion</td>
</tr>
<tr>
<td>----------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Documentation covers a 2-week period</td>
<td>Placement worksheet, placement verification form (or other verification documents)</td>
<td>PRH Exhibits 4-1 and 4-2 specify that placements require a certain number of hours within a 1-week period. However, because many employers’ payroll systems operate on a biweekly basis, it is recommended that Regional Offices allow verification documents covering a 2-week period provided that they show that the student worked/attended at least twice the number of hours required in a 1-week period. In such cases, the date placed should be the end of the first of the 2 weeks.</td>
</tr>
<tr>
<td>Student’s date placed fell after the close of the placement window</td>
<td>Placement worksheet, placement verification form, ETA Form 6-40</td>
<td>In order for a placement to be considered valid, the date reported must occur prior to the close of the placement window, the placement must satisfy the requirements specified in PRH Exhibit 4-1, and the placement verification must be received and reported to the JCDC via the CTS system within 90 days of date placed. If, however, the date reported occurs within the last 7 days of the placement window, the date placed and the date verified must be obtained and entered in the CTS system within 90 days of the end of the placement window. Any placement that does not meet the above criteria should be considered a potentially invalid placement. Note, however, that the placement window for eligible students who separated as medical separations with reinstatement rights (MSWR) does not begin until the student’s close-out occurs. This close-out date may be either during their 180-day reinstatement period (MSWR Early Close-out date) or at the end of their 180-day reinstatement period (MSWR Close-out date). The close-out date typically occurs at a later date than the student’s separation date. Reviewers should pay particular attention to whether the placement fell within the student’s active placement window for cases whose selection reason is “Late.”</td>
</tr>
<tr>
<td>Information on verification form indicates that placement did not meet definition</td>
<td>Placement worksheet, placement verification form, PRH Exhibit 4-1</td>
<td>Reviewers should pay close attention to whether the information on the placement form is sufficient to determine that the placement met the definition given in Exhibit 4-1. Reasons that a placement may not meet the definition include, but are not limited to, an insufficient number of hours per week in the job or training, an expected training duration of less than 90 days, or a wage below the federal minimum. Such placements should be considered potentially invalid and the reviewer should put an “X” in the “RO Dec: Invalid” column.</td>
</tr>
</tbody>
</table>
8. Reporting on Assessment Results

At the end of the assessment, combine all reviewers’ completed Excel worksheets into a single aggregated work file. Unfortunately, this is a time-consuming and tedious process that involves cutting and pasting from one file to another. Re-sorting the records so that those audited by each individual are all together and in the same order can simplify the process by enabling the data entries to be copied and pasted in blocks.

Data integrity reviewers typically produce a summary report categorizing and tallying the types of problems found during the audit. This summary includes a count of the GED and CTT credits determined to be potentially invalid, the reasons for these determinations, a count of unexcused days, the number of students who had problems with their leave records resulting in unexcused days, the reason some days were determined to be unexcused, and any administrative findings the region and center should be aware of that do not threaten the validity of reported data (e.g., failure to document AWOL retrieval attempts). Some regions have chosen to incorporate the results presented in the summary into Chapter 6 of their assessment report; others have submitted a separate data integrity report as an attachment. Likewise, the completed Excel worksheets are typically submitted to the center, but the regions have discretion in deciding when and if this occurs.

In some cases, the region may decide that the data integrity violations found are egregious enough that the contractor should be assessed liquidated damages as part of the year-end contract reconciliation. Again, this decision is at the discretion of the region. As a general principle, the center will be given a chance to respond and provide additional documentation for any data integrity violations found before any liquidated damages are assessed.
Appendix 1: Downloading Samples from the Job Corps Resource Library

Assessment samples for all centers are now available for download from JCRL. New samples for every center are generated and posted quarterly.

To download the current samples in preparation for an assessment of a particular center, click on “Audit” on the left side of the window and then on “DIG Audit Samples.” The samples are listed by center ID number (given in the “Context” column) and are named with a date stamp in the format “assessment_mmddyyyy.xls.” The date stamp refers to the end of the 1-year assessment period. The most current samples for every center should be listed first and will typically be 3–6 months earlier than the present date to allow centers sufficient time to make sure that students’ records are finalized post-separation.

To download samples for a particular center, click on the filename corresponding to the appropriate center ID number and save the file to your computer. Note that because the samples for every center are named identically, it is **strongly recommended that you rename the file with a unique name corresponding to the center** to avoid later confusion. Note that the center name is given in the header of the samples themselves so that you can confirm that you downloaded samples for the correct center by opening the file in MS Excel.

The current version of this assessment guide can be downloaded by clicking on “Resources” under “Audit” on the left side of the window.
### Duty/Pay/Leave Status Chart

<table>
<thead>
<tr>
<th>PAY STATUS</th>
<th>DUTY STATUS</th>
<th>CIS Leave Type</th>
<th>CIS Leave Reason</th>
<th>USES</th>
<th>CRITERIA/LIMITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paid</td>
<td>Present for Duty</td>
<td>Present for Duty On Center</td>
<td>N/A</td>
<td>For students involved in normal training and other on-center activities.</td>
<td>Centers must have documented daily accountability for student attendance at the ACT/OCT site; this documentation should be submitted, at a minimum, once per week to the center.</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty Off Center</td>
<td>Present for Duty Off Center</td>
<td>Nonresident OCT/ACT</td>
<td>For nonresident students enrolled in off-center ACT/OCT programs.</td>
<td></td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty Off Center</td>
<td>Present for Duty Off Center</td>
<td>Home-Based WBL</td>
<td>For students involved in authorized activities off center for home-based work-based learning (WBL).</td>
<td>Home-based WBL assignment is limited to a maximum of 6 work weeks (30 training days) per student enrollment. The Regional Office, at its discretion, may grant a waiver to extend the 5-week limit if there is reasonable expectation of full-time employment not to exceed 6 additional weeks (30 additional training days). See PRH 3.8 for details. At the end of the home-based WBL assignment, the student may return to the center, or may be separated as an ordinary separation without returning. When a student does not return to the center, the center is required to arrange an appointment for the student with the student's CTS counselor.</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty Off Center</td>
<td>Present for Duty Off Center</td>
<td>CTST/WBL/OCT</td>
<td>For students involved in off-center training that requires overnight stays (CTST, WBL, OCT).</td>
<td>The CTST projects must be approved on a center's CTST plan. Other WBL and OCT must have approval by the region through the CDSS plan or authorization letter. Covers such programs as American Barge Lines, Advanced Paving, Advanced Cement, Habitat, and similar programs.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Career-Related Activities</td>
<td>For students involved in authorized activities off center for job interviews, job search, apprenticeship registration, college registration, or armed forces processing.</td>
<td>Maximum length of time for out-of-town job search and interviews, apprenticeship registration, college registration, or armed forces processing shall not exceed 10 training days during enrollment. The Regional Office, at its discretion, may grant a waiver to extend the 10 training day limit if there is reasonable expectation of full-time employment. Regional Office extensions are limited to 5 training days during a student's enrollment. Students must have at least two prearranged and</td>
</tr>
<tr>
<td>PAY STATUS</td>
<td>DUTY STATUS</td>
<td>CIS Leave Type</td>
<td>CIS Leave Reason</td>
<td>USES</td>
<td>CRITERIA/LIMITATIONS</td>
</tr>
<tr>
<td>------------</td>
<td>-------------</td>
<td>---------------</td>
<td>-----------------</td>
<td>------</td>
<td>---------------------</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty Off Center</td>
<td>Present for Duty Off Center</td>
<td>Firefighting, Emergency Service</td>
<td>For students involved in authorized activities off center firefighting and/or national emergencies.</td>
<td>• Maximum length of time shall not exceed 8 weeks (56 calendar days) per year of enrollment. • Verification must be documented on the leave form in CIS.</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty Off Center</td>
<td>Present for Duty Off Center</td>
<td>Center Miscellaneous</td>
<td>For students involved in authorized training activities off center for recruiting drives, escort duty, competitions, awards, conferences, events.</td>
<td>• Maximum length of time shall not exceed 10 training days during enrollment. • Verification must be documented on the leave form in CIS.</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty En Route</td>
<td>En Route</td>
<td>En Route</td>
<td>For students in authorized travel status using most direct route home or to receiving center for: • New Arrivals. • Separations. • Transfers.</td>
<td>• New enrollee with inbound travel overnight or longer. • Separating students with travel overnight or longer. • Transferring students during travel by most direct route. • En route status not authorized if student takes unauthorized side trip or layover.</td>
</tr>
<tr>
<td>Paid</td>
<td>Present for Duty On Pass</td>
<td>On Pass</td>
<td>Visit family/Friend National Guard Duty</td>
<td>For authorized overnight pass including National Guard weekend duty.</td>
<td>• Must not conflict with scheduled classes. • Destination must be documented. • For minors, only to destinations authorized by parental consent.</td>
</tr>
<tr>
<td>Paid</td>
<td>Not Present for Duty</td>
<td>Winter Break</td>
<td>Visit family/Friend</td>
<td>Students are entitled to a scheduled winter break set by the National Office of Job Corps. This break will be scheduled to include 10 non-training days as well as two federal winter holidays and three weekends. Students are entitled to a scheduled summer break set by the National Office of Job Corps.</td>
<td>• Destination is home of record, or alternate destination with transportation costs no higher than to home of record. • For minors, only to destinations authorized by parental consent. • Students are entitled to go on winter and summer breaks regardless of length of enrollment.</td>
</tr>
</tbody>
</table>

AUGUST 18, 2008

June 23, 2010
### Exhibit 6-1 (Page 1)

#### PRH Chapter 6: Administrative Support

<table>
<thead>
<tr>
<th>PAY STATUS</th>
<th>DUTY STATUS</th>
<th>CIS Leave Type</th>
<th>CIS Leave Reason</th>
<th>USES</th>
<th>CRITERIA/LIMITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paid</td>
<td>Not Present for Duty - Administrative Leave With Pay</td>
<td>Center closure for emergency</td>
<td>For authorized absences due to:</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Securing medical treatment</td>
<td>• Center closure for emergency conditions.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Subpoenaed court appearance</td>
<td>• Securing medical/dental treatment as concurred by center health staff.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Temporarily housed off center</td>
<td>• Subpoenaed court appearance</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Life-threatening illness/injury</td>
<td>• Temporarily housed off center as a precaution against harm or injury to self.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Illness or injury of child</td>
<td>• Life-threatening illness or injury to immediate family (mother, father, spouse, grandmother/father, child, sister, brother, guardian, sole living blood relative, someone acting in lieu of parents).</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>• Serious illness or injury to student’s child.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

- Students may elect not to go on break, but may decide to remain at the center instead. Centers must have an appropriate level of structured activities for students who remain at the center during break periods.
- Some students will not be able to go on the scheduled break because of conflicts with their off-center training or program activity schedules. In these cases, the students shall be permitted to go on an alternate break consisting of 10 consecutive non-training days. The alternate 2-week summer break period must begin no sooner than June 1 and end no later than August 31. The alternate winter break period must begin no sooner than the Saturday prior to Martin Luther King, Jr. Day.
- Regional Offices may authorize individual break schedules for specific students. Documentation of approval must be maintained in the students’ permanent record.

- Shall not exceed 5 training days within any consecutive 6-month period.
- Must be verified by attending physician, hospital authority, government authority, or court official.
- Verification obtained from phone calls is allowed as long as the following information is obtained and documented on the CIS leave form: name of contact person, title, phone number, date of contact, and name and address of the facility.
- Regions can authorize an additional 5 training days for students who have extenuating circumstances. Documentation and regional approval must be maintained in the student’s permanent record.
- Regions can extend the number of training days under this leave in the case of emergency center closure.
<table>
<thead>
<tr>
<th>PAY STATUS</th>
<th>DUTY STATUS</th>
<th>CIS Leave Type</th>
<th>CIS Leave Reason</th>
<th>USES</th>
<th>CRITERIA/LIMITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paid</td>
<td>Not Present for Duty – Bereavement Leave</td>
<td>Bereavement Leave</td>
<td>Bereavement</td>
<td>Death in immediate family (mother, father, spouse, grandmother/father, child, sister, brother, guardian, someone acting in lieu of parents).</td>
<td>• Not to exceed 10 training days per the prior 12-month window of time.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Must be verified by attending physician/hospital, funeral director, American Red Cross.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Verification obtained from phone calls is allowed as long as the following information is obtained and documented on the CIS leave form: name of contact person, title, phone number, date of contact, and name and address of the facility.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>• Verification must be obtained within 1 working day after leave request.</td>
</tr>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>• Must be authorized by CD or designee.</td>
</tr>
<tr>
<td>Paid</td>
<td>Not Present for Duty – Active Duty Military</td>
<td>Active Duty Military</td>
<td>Active Duty Military</td>
<td>Short-term active duty in National Guard.</td>
<td>• Not to exceed 8 weeks (56 calendar days) during enrollment.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>• Must be verified with Military Personnel.</td>
</tr>
<tr>
<td>Paid</td>
<td>Not Present for Duty – Personal Leave</td>
<td>Personal Leave With Day</td>
<td>Personal Leave With Day</td>
<td>For students to use at their discretion. Only allowed with concurrence of the center.</td>
<td>• 5 training days available upon enrollment for personal leave use.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>• After 6 months of enrollment, 1 training day is accrued every subsequent 30 calendar days of enrollment.</td>
</tr>
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<td></td>
<td></td>
<td>• The personal leave day must be requested by the student, and the CIS leave form submitted, no later than 1 hour after a student’s scheduled training day start time on the leave date.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• No special documentation required, other than the CIS leave form.</td>
</tr>
<tr>
<td>Unpaid</td>
<td>Not Present for Duty - AWOL</td>
<td>Absent Without Leave (AWOL)</td>
<td>N/A</td>
<td>For students who fail to return or report to center within 3 hours of the student’s scheduled training day start time.</td>
<td>• AWOL absence in excess of 6 consecutive training days (not including weekends, holidays, SBRK, WBRK, or other center non-training days) will result in separation from the program 3 hours after student’s scheduled training day start time.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• Unauthorized absences in excess of 12 training days (not including weekends, holidays, SBRK, or other non-training days) per the prior 6-month window of time will result in separation from the program 3 hours after student’s scheduled training day start time on the 13th training day, with the separation date being the 13th training day.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>• If the student contacts the center with a credible and</td>
</tr>
</tbody>
</table>

AUGUST 18, 2008
### PRH Chapter 6: Administrative Support

<table>
<thead>
<tr>
<th>PAY STATUS</th>
<th>DUTY STATUS</th>
<th>CIS Leave Type</th>
<th>CIS Leave Reason</th>
<th>USES</th>
<th>CRITERIA/LIMITATIONS</th>
</tr>
</thead>
</table>
| Unpaid     | Not Present for Duty - Administrative Leave Without Pay | Administrative Leave Without Pay | Unsubpoenaed court appearances | For authorized absences due to:  
- Unsubpoenaed court appearances.  
- Pending results of disciplinary fact finding when deemed necessary to remove student from campus.  
- Appearance for probation/parole.  
- Cultural or religious observances/practices. | Verifiable explanation, the student's status may be changed to the appropriate leave category, effective the date of the contact and receipt of documentation to support the status change. The required verification is the same as outlined for Bereavement, Paid Administrative Leave, etc. |
| Unpaid     | Not Present for Duty - Personal Leave Without Pay | Personal Leave Without Pay | Fending review board | | 5 training days allowed during a consecutive 6-month window.  
Verification from court, medical provider, or a CSO incident report must be documented and submitted in CIS prior to leave being granted.  
Verification obtained from phone calls is allowed as long as the following information is obtained and documented on the CIS leave form: name of contact person, title, phone number, date of contact, and name and address of the facility.  
Regions can authorize an additional 5 UDAL days for students who have extenuating circumstances such as subsistence fishing/hunting or religious accommodations. Documentation of the need for student's presence at home and Regional Office approval is required and shall be maintained in the permanent record. |
| Paid       | Not Present for Duty - Separation in Error | Separation in Error | For students who are separated due to clerical error and must be re-established | No maximum number of days.  
This leave category may be used at the discretion of the Regional Office. |

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**AUGUST 18, 2008**

**June 23, 2010**
### Exhibit 6-1 (Page 9)

<table>
<thead>
<tr>
<th>PAY STATUS</th>
<th>DUTY STATUS</th>
<th>CIS Leave Type</th>
<th>CIS Leave Reason</th>
<th>USES</th>
<th>CRITERIA/LIMITATIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Paid</strong></td>
<td>Net Present for Duty – Disciplinary Separation Overturn</td>
<td>Disciplinary Overturn With Pay</td>
<td>Disciplinary Overturn With Pay</td>
<td>For re-establishment after disciplinary discharges are overturned by the Regional Office. For re-establishment after student found not guilty of felony or misdemeanor charge.</td>
<td>- Center must submit justification to Regional Office for approval. - No maximum number of days. - Center must submit justification to Regional Office for approval. - Regional Office to approve use of this status.</td>
</tr>
<tr>
<td><strong>Unpaid</strong></td>
<td>Net Present for Duty – Disciplinary Separation Overturn</td>
<td>Disciplinary Overturn Without Pay</td>
<td>Disciplinary Overturn Without Pay</td>
<td>For re-establishment after disciplinary discharges are overturned by the Regional Office. For re-establishment after student found not guilty of felony or misdemeanor charge.</td>
<td>- No maximum number of days. - Center must submit justification to Regional Office for approval. - Regional Office to approve use of this status.</td>
</tr>
</tbody>
</table>
Appendix 3: Using the Center Information System for Assessing Student Leave

Below are screenshots of the CIS with corresponding guidelines for using the CIS to review student leave.

Each reviewer conducting the review of student leave will need to have access to the CIS system (requires Citrix log-in/password and log-in/password for the CIS).

1. Once logged into the CIS, the reviewer needs to choose the center under review from the list of centers. Double click highlighted center or highlight center and click OK.
2. The CIS Main Menu will appear. Check to see if the name of the center you have chosen appears at the top of the screen.

At the top of the screen is the toolbar. Icons useful for DIA purposes include:

- The icon of the Man Wearing Sunglasses will take you to the **Student Look Up** function at any time.
- The Dome icon will take you back to the list of centers.
- The Door will exit you from the CIS.
3. To begin the review of a student leave record, use the **Student Look Up** button on the main menu to search for and select the student.
4. A new box will appear allowing you enter the student’s name or ID number. Before entering student information, make sure the Status drop-down menu reads "Separated." Enter information and click "Retrieve." The student’s name and corresponding information will appear in the white box. Highlight the student’s line by clicking on it and click "Select."
5. Once a student has been chosen, the program will take you back to the Main Menu, and the student’s name should now appear at the bottom of the screen in the Student box. If the name does not appear, go back to Student Look Up and try again.

6. Once you’ve confirmed the student’s name on the bottom of the screen, click on the Student Information icon.

7. A new screen will open, and it will take a minute or so for all of the tabs within to be populated. Again, once the student information appears, check to make sure you have selected the right student.
8. There are two primary areas within the **Student Information** section that will need to be accessed to assess student leave: the Leaves tab and the Daily Status tab.

The **Leaves tab** provides a listing of each leave request that has been entered into the CIS. All leave requests should have verification information in the Comments box and/or documentation in the student’s file to support the granting of leave. Additionally the Leaves tab includes a count of days Used and Remaining for each leave category in the Leave Days box at the bottom right-hand corner. NOTE: The Leave Days box is not always accurate!
The **Daily Status tab** lists the student’s entire attendance history and includes On Center, AWOL, and leave periods. Information on the Daily Status tab should match the student’s ETA 6-40.

<table>
<thead>
<tr>
<th>Status</th>
<th>Start Date</th>
<th>Total Days</th>
<th>Training Days</th>
</tr>
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<tbody>
<tr>
<td>Present for Duty On Center</td>
<td>09/11/2007</td>
<td>66</td>
<td>56</td>
</tr>
<tr>
<td>Admin Leave W/O Pay - Unpaid</td>
<td>11/02/2007</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>12/03/2007</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Admin Leave W/O Pay - Unpaid</td>
<td>12/04/2007</td>
<td>6</td>
<td>4</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>12/10/2007</td>
<td>4</td>
<td>4</td>
</tr>
<tr>
<td>Winter Break - Paid</td>
<td>12/14/2007</td>
<td>20</td>
<td>2</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>01/02/2008</td>
<td>25</td>
<td>15</td>
</tr>
<tr>
<td>Admin Leave W/O Pay - Unpaid</td>
<td>01/29/2008</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>02/19/2008</td>
<td>14</td>
<td>9</td>
</tr>
<tr>
<td>Temporarily Unaccounted For - Paid</td>
<td>02/15/2008</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>02/19/2008</td>
<td>34</td>
<td>23</td>
</tr>
<tr>
<td>Temporarily Unaccounted For - Paid</td>
<td>03/04/2008</td>
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<td>1</td>
</tr>
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<td>Present for Duty On Center</td>
<td>03/25/2008</td>
<td>34</td>
<td>24</td>
</tr>
<tr>
<td>Personal Leave w/Pay - Paid</td>
<td>04/29/2008</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>04/30/2008</td>
<td>37</td>
<td>26</td>
</tr>
<tr>
<td>Personal Leave w/Pay - Paid</td>
<td>06/05/2008</td>
<td>3</td>
<td>1</td>
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<tr>
<td>Present for Duty On Center</td>
<td>06/05/2008</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Absent Without Leave - Unpaid</td>
<td>06/13/2008</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Present for Duty On Center</td>
<td>06/12/2008</td>
<td>15</td>
<td>11</td>
</tr>
</tbody>
</table>

June 23, 2010
9. Closing the Student Information section will return the user to the CIS main menu page. From the main menu, the reviewer can access the Case Notes section of the CIS to review all the case notes that have been entered for the student under review.

Inside the Case Notes section, the reviewer will have a choice about how to review the Case Notes information. Choosing Browse Case Notes by Student will lead the reviewer directly to the Case Notes for the student currently selected for review. Once on the student case notes page, the reviewer will be able to sort which type of case notes he or she would like to review, such as sorting by “Note Type,” which allows a reviewer to look for types such as AWOL retrieval notes.
10. An additional section useful to reviewers will be the **Work-Based Learning Report** within the **Training** section of the CIS.

The **Work-Based Learning Report** provides information on any CTST or WBL leave the student may have taken while enrolled in Job Corps.
11. Two additional reports within the CIS that will prove useful to reviewers are the Non-Training Days Report within the Systems Functions section and the student’s ETA 6-40 Report in the Enrollment section.

The Non-Training Days Report provides the reviewer with yearly calendars noting the days the center was not open.

The example below is for the year 2008 (years are selected by the reviewer).
The student’s **ETA 6-40 Student Profile Report** can be accessed from the **Enrollment** section.

**NOTE:** Student information does not need to be reentered. By choosing Select in the ETA 6-40 report pop-up box, the reviewer will be taken back to the Student Look Up box where the student under review should already be highlighted. Choosing Select again in the Student Look Up will populate the fields in the ETA 6-40 box. The reviewer then simply selects Retrieve to generate the ETA 6-40 for the student under review.
Appendix 4: 2006–2010 Reference Calendars

Calendars for 2006 through 2010 are provided below as a reference tool. For example, they may be used to confirm that steps on a TAR were signed off on training days or to count the number of training days a student spent in a particular status. Weekends and summer and winter breaks are considered non-training days and are shaded gray. However, be aware that some centers may have breaks that do not correspond to the dates given here, and that individual students may also, with prior approval, take their breaks at alternate times. In addition, these calendars do not indicate holidays and other center-specific non-training days.
2006

January
Su Mo Tu We Th Fr Sa
1  2  3  4  5  6  7
8  9 10 11 12 13 14
15 16 17 18 19 20 21
22 23 24 25 26 27 28
29 30 31

February
Su Mo Tu We Th Fr Sa
1  2  3  4
5  6  7  8  9 10 11
12 13 14 15 16 17 18
19 20 21 22 23 24 25
26 27 28

March
Su Mo Tu We Th Fr Sa
1  2  3  4
5  6  7  8  9 10 11
12 13 14 15 16 17 18
19 20 21 22 23 24 25
26 27 28 29 30 31

April
Su Mo Tu We Th Fr Sa
1
2  3  4  5  6  7  8
9 10 11 12 13 14 15
16 17 18 19 20 21 22
23 24 25 26 27 28 29
30

May
Su Mo Tu We Th Fr Sa
1  2  3  4  5  6
7  8  9 10 11 12 13
14 15 16 17 18 19 20
21 22 23 24 25 26 27
28 29 30 31

June
Su Mo Tu We Th Fr Sa
1  2  3
4  5  6  7  8  9 10
11 12 13 14 15 16 17
18 19 20 21 22 23 24
25 26 27 28 29 30

July
Su Mo Tu We Th Fr Sa
1
2  3  4  5  6  7  8
9 10 11 12 13 14 15
16 17 18 19 20 21 22
23 24 25 26 27 28 29
30 31

August
Su Mo Tu We Th Fr Sa
1  2  3  4  5
6  7  8  9 10 11 12
13 14 15 16 17 18 19
20 21 22 23 24 25 26
27 28 29 30

September
Su Mo Tu We Th Fr Sa
1  2
3  4  5  6  7  8  9
10 11 12 13 14 15 16
17 18 19 20 21 22 23
24 25 26 27 28 29 30

October
Su Mo Tu We Th Fr Sa
1  2  3  4  5  6  7
8  9 10 11 12 13 14
15 16 17 18 19 20 21
22 23 24 25 26 27 28
29 30 31

November
Su Mo Tu We Th Fr Sa
1  2  3  4
5  6  7  8  9 10 11
12 13 14 15 16 17 18
19 20 21 22 23 24 25
26 27 28 29 30

December
Su Mo Tu We Th Fr Sa
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10 11 12 13 14 15 16
17 18 19 20 21 22 23
24 25 26 27 28 29 30
31

June 23, 2010
2008

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June 23, 2010