

U.S. Department of Labor

Office of Inspector General—Office of Audit

**REPORT TO THE EMPLOYMENT
AND TRAINING ADMINISTRATION**



**COVID-19: ETA SHOULD CONTINUE TO
CLOSELY MONITOR IMPACT ON JOB
CORPS PROGRAM**

**DATE ISSUED: JULY 28, 2020
REPORT NUMBER: 19-20-007-03-370**



BRIEFLY...

COVID-19: ETA SHOULD CONTINUE TO CLOSELY MONITOR IMPACT ON JOB CORPS PROGRAM

July 28, 2020

WHY OIG CONDUCTED THE AUDIT

On January 31, 2020, the Secretary for Health and Human Services declared a nationwide public health emergency in response to the coronavirus (COVID-19) pandemic. As of June 28, 2020, there were over 2 million confirmed COVID-19 cases in the United States, and social distancing mandates have caused mass disruption to the economy and peoples' lives in every state.

As part of Phase 1 of the OIG's Pandemic Oversight Response Plan, this report presents the results of our audit of the Employment and Training Administration's initial response to challenges to the Job Corps program posed by the pandemic.

WHAT OIG DID

We conducted a performance audit to answer the following question:

What actions has Job Corps taken in response to challenges posed by the COVID-19 pandemic?

To answer this question, we interviewed ETA and Job Corps officials, and reviewed select guidance issued by federal, state, local governments; and policies and guidance Job Corps issued on COVID-19.

READ THE FULL REPORT

<https://www.oig.dol.gov/public/reports/oa/2020/19-20-007-03-370.pdf>

WHAT OIG FOUND

Job Corps temporarily suspended operations on its campuses on March 16, 2020 and transported nearly 30,000 students to their homes or found them housing. Fifty-five centers remained open to house and feed 445 students who had nowhere to go. Between March 16 and May 31, 2020, 4 of these students tested positive for COVID-19. Thirty-five staff tested positive while they were actively working.

Job Corps transitioned all centers to remote learning on May 11, 2020 in order to continue educating and training students. However, not all students had a laptop, tablet, or even internet access to participate in remote learning. Job Corps said it is working to ensure each student has the necessary tools needed for remote learning by August 2020. Remote learning creates additional challenges for Job Corps students as most are high school dropouts and have deficiencies in basic skills. Without the structured environment Job Corps provides, some students may not be able to learn remotely and may leave the program. Remote learning will be especially challenging as some technical training skills, such as automotive and machine repair, carpentry, and advanced cement masonry, may be difficult to learn when limited to only virtual instruction.

In preparation for when all Job Corps centers reopen, Job Corps recognizes students may surpass the allotted amount of time they may remain in the program. Job Corps said it will grant extensions to address this. In April 2020, Job Corps also started requiring its career transition and outreach and admissions services providers work remotely.

WHAT OIG RECOMMENDED

We made recommendations focused on protecting the health of students and staff currently at centers, ensuring both centers and remote students have the necessary resources to engage in a virtual learning environment, and ensuring centers have the proper controls in place to adhere to national safety guidance prior to reopening their campuses.

ETA generally agreed with our recommendations.

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INSPECTOR GENERAL'S REPORT

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This report presents the results of the Office of Inspector General's (OIG) audit of the Employment and Training Administration's (ETA) actions to mitigate the challenges the coronavirus (COVID-19) pandemic had on the Job Corps program. On January 31, 2020, the Secretary for Health and Human Services declared a nationwide public health emergency in response to COVID-19.

The Job Corps program, administered by ETA, provides academic and job skills training in a mostly residential setting to disadvantaged youth (i.e., those who receive public assistance and/or live below the poverty line) who face numerous barriers to employment, such as being a high school dropout or deficient in basic skills. With 121 centers located nationwide and in the Commonwealth of Puerto Rico, Job Corps provides housing, meals, health care services, and support services to students. According to Job Corps, there were about 30,000 students enrolled when the pandemic occurred.

As part of Phase 1 of the OIG's Pandemic Oversight Response Plan and given the disruptive nature of the COVID-19 pandemic, we conducted this audit to answer the following question:

What actions has Job Corps taken in response to challenges posed by the COVID-19 pandemic?

We found that Job Corps faces a number of challenges, which include: protecting the health of students and staff at centers and fulfilling its responsibility to train

students. In response, Job Corps temporarily closed center campuses, sent most students home, and transitioned to remote learning.

To answer this question, we obtained information from ETA and Job Corps via interviews and a questionnaire and reviewed select guidance issued by federal, state, and local governments, as well as policies and guidance issued by Job Corps specifically addressing COVID-19-related issues. Our audit covered the three-month period from March 2020 through May 2020.

RESULTS

Job Corps faces two primary challenges related to the COVID-19 pandemic:

- Protecting the health of students and staff at centers, and
- Continuing to recruit, train, and place students.

ETA responded by temporarily suspending operations on Job Corps campuses, sending students home, and transitioning to a remote training environment, among other things. Some centers stayed open to provide housing and meals for students who had nowhere to go. Protecting everyone at these centers (i.e., students and essential staff) remains a challenge. Even with remote learning, Job Corps faces other hurdles as many students: need the structured environment Job Corps provides; do not have ready access to the tools – laptop or tablet, or even internet access – to connect remotely; and may be unable to learn and complete certain trades remotely, such as automotive and machine repair and carpentry, without equipment and hands-on instruction.

Job Corps faces more challenges similar to those faced by other residential, educational and training programs with reopening centers – from implementing physical distancing in classrooms, dorms, and common areas and maintaining ample supplies of disinfectant and cleaning materials. High unemployment due to the temporary shuttering of non-essential businesses will also impact the program's ability to place students in good jobs during and after the pandemic.

PROTECTING THE HEALTH OF JOB CORPS STUDENTS AND STAFF AT CENTERS

As the COVID-19 pandemic rapidly developed and guidance recommending people stay-at-home emerged from the Centers for Disease Control and Prevention (CDC) and state and local governments nationwide, ETA initiated a number of actions to protect the health of students and staff at Job Corps

centers. These actions included issuing prevention guidance, suspending operations on Job Corps center campuses, and sending students home.

Adhering to Federal, State, and Local Government Safety and Health Guidelines

The CDC and governments at the state and local levels developed and implemented a variety of guidelines to help prevent the spread of the disease. The CDC recommended everyday steps, such as washing hands often, covering mouth and nose with a cloth face cover when around others, and covering coughs and sneezes. In addition, the CDC noted keeping space between people is one of the best tools to avoid exposure to this virus and slowing its spread locally and across the country and world. To that end, the CDC and most states recommended people practice social distancing (also referred to as physical distancing) by keeping space between themselves and others outside their household as follows:

- Stay at least 6 feet (about 2 arms' length) from other people
- Do not gather in groups
- Stay out of crowded places and avoid mass gatherings

On March 16, 2020, the federal government recommended every American follow these guidelines through the end of the month. On or about the same time, most states, as well as many local jurisdictions, started instituting stay-at-home or shelter-in-place orders that temporarily closed schools and non-essential businesses and restricted people from leaving their homes, except for essential activities, essential travel, and exercise.

Adhering to federal, state, and local recommendations and restrictions created challenges for Job Corps as students generally live in center housing. In response, ETA disseminated critical information and implemented a number of protocols that included:

- *Informing centers about COVID-19 and prevention information.* On March 6, 2020, Job Corps issued Information Notice (IN) 19-12 providing center directors and operators with COVID-19 facts, prevention information, and resources. Among other things, the IN also required center operators to review and update their pandemic influenza response plans and modify them as needed to address the evolving impacts of COVID-19.
- *Temporarily suspending on campus operations.* On March 16, 2020, Job Corps issued Program Information Notice (PIN) 19-14 establishing a spring break and temporarily closing centers from March 16, 2020, through April 14, 2020. In consideration of federal, state and local

guidelines, including the existence of at least 44 state shelter-in-place orders, Job Corps extended its break through May 10, 2020 via follow-up PIN 19-15 issued on April 13, 2020. On May 11, 2020, Job Corps transitioned to remote learning and kept center campuses closed.

- *Transporting students to their homes or finding alternative living arrangements.* According to Job Corps, centers provided students with transportation home and to their designated alternative locations, or worked with local authorities to find other arrangements, and continued providing housing and food to students who remained on campuses due to students who had no stable and safe alternative housing arrangements.
- *Ensuring safety and health of students still at centers.* Job Corps told us 445 students remained on its campuses. To minimize the risk of an outbreak on a center, Job Corps said it worked with medical consultants to assess the medical risks associated with consolidating the remaining students at one of six proposed centers (one center in each region) and settled on a much smaller scale consolidation of students to ensure student safety. As of May 31, 2020, 55 centers remained open to house and feed students who had no stable and safe alternative housing arrangements. Job Corps also allowed staff to work on centers to clean and sanitize the facilities. To protect everyone still on campus, Job Corps issued standard operating procedures (SOPs) on April 3, 2020, outlining reporting and notification responsibilities when a center staff member or student tests positive for COVID-19. Job Corps also issued PINs and INs providing centers with the CDC's COVID-19 environmental cleaning and disinfection recommendations to use in cleaning and sanitizing Job Corps facilities (April 8, 2020) and a checklist to help them determine what actions to take upon being informed of a staff or student who tests positive for COVID-19 (April 21, 2020).

Job Corps informed us that between March 16 and May 31, 2020, 4 students and 35 staff on center campuses tested positive for COVID-19 (as of May 31, 2020). According to the noted checklist and other Job Corps guidance, centers' actions include the following:

- Notify Job Corps' management, its Health and Wellness Manager, contracted regional health specialists (as needed), and the local health department of the positive test and follow directions about any needed actions;
- Identify the students and staff the person who tested positive may have interacted with during the previous 14 days, provide this information to Job

Corps and the local health department, and follow directions about any needed actions;

- Implement temperature check plan and other precautionary measures consistent with CDC guidance;
- Isolate students who test positive for COVID-19 or have symptoms, while ensuring staff have the necessary Personal Protective Equipment (PPE) to safely manage them;
- Alert all students and staff about of positive cases while maintaining privacy;
- Monitor the health of students in isolation, as well as students and staff at and off center; and
- Clean and disinfect all heavily impacted work areas using a professional company, in addition to their routine cleaning and disinfecting.

Additionally, Job Corps needs to continue monitoring the number of individuals testing positive, provide oversight to ensure the appropriate actions are completed and take any necessary steps to contain the spread of COVID-19 at its centers.

Students in Need of Prescription Medication

Providing prescription medications to students after Job Corps suspended on campus operations was another challenge. Students have access to basic medical services on center, including prescription medications when students are leaving campus on planned breaks. Because campus operations were suspended, access to prescription medications was limited.

To address this, Job Corps issued PIN 19-16, on April 24, 2020, requiring centers provide access to prescription medication to students while they are off-center during the duration of the break, including sending medication via mail in compliance with federal and state laws, as well as arranging transfers of prescriptions to local pharmacies or providers.

**CONTINUING TO DELIVER TRAINING, CAREER
TRANSITION, AND OUTREACH AND
ADMISSIONS SERVICES**

To continue delivering academic and career instructional training, ETA transitioned all Job Corps centers to distance learning. Since most students are low income, high school dropouts and have deficiencies in basic skills, many students may not have the tools (e.g., laptop or internet service) or the ability to learn remotely without the structured environment Job Corps provides. Job Corps also started requiring its career transition and outreach and admissions services providers work remotely.

Providing Learning Activities and Career Skills Training to Students

Job Corps temporarily transitioned all centers to virtual training to ensure students continue to receive training during the pandemic. However, virtual training will be a challenge for Job Corps' student population. Many students are high school dropouts and/or basic skills-deficient (i.e., have reading, writing, and computer skills at or below the 8th grade level). Without the structured environment Job Corps provides, which includes housing, food, and healthcare, as well as guidelines for going to bed and getting up early, some students may not be able to learn remotely and may leave the program. However, Job Corps has stated these students will have the flexibility to return to the program once centers resume on campus operations.

Furthermore, like many school districts nationwide, Job Corps did not have an established infrastructure in place to deliver its entire training program virtually. Job Corps is creating the needed infrastructure by requiring center operators to design and deploy distance-learning plans that are consistent with contract requirements and program guidance. To accomplish this, Job Corps took, or is taking, the following actions:

- On April 24, 2020, Job Corps issued PIN 19-17 requiring centers to transition to virtual training starting on May 11, 2020. According to Job Corps, centers can deliver remote training through online courses, mobile learning, webcasts, podcasts, video learning, computer-based instructions and other tools. According to Job Corps, as of July 15, 2020, almost 19,000 active students have logged onto Google Classrooms, the largest online platform being utilized for distance learning by Job Corps centers.
- PIN-19-17 also requires center operators and national training contractors to provide telework or distance learning plans for trades that may typically require equipment or hands-on-instruction. This will be especially

- challenging as some technical training skills that require hands-on demonstration of technical proficiency, such as automotive and machine repair, carpentry, and advanced cement masonry, may be difficult to learn when limited to only virtual instruction.
- Provided national training contractors and centers templates to support tracking and reporting student attendance and participation.
 - Job Corps will continue to use its self-paced training methods and address individual training needs as needed. When requested, Job Corps will work with students with disabilities to determine reasonable accommodations.
 - Required centers to provide students an alternative to learning online that included using learning packages that are mailed to students.
 - Shared contractor common practices in distance learning to support collaboration and drive continuous improvement in the delivery of services.
 - On April 22, 2020, Job Corps conducted an information technology survey of 29,055 active students. Of the 25,357 students who responded, 85 percent reported having access to either a computer, laptop, or smart device to be able to access an online distance learning platform, indicating at least 3,800 students did not have access to either of these. Job Corps is working to ensure each student has the needed tools — a laptop or tablet and internet service — for remote learning by August 2020. Given Job Corps' income eligibility requirement (i.e., receive public assistance and/or live below the poverty line), many students may not have the necessary equipment to learn remotely.
 - Retained an educational consultant to review and advise Job Corps on improving its distance learning program.

Reopening Centers

Resuming operations at 121 center campuses brings more challenges, such as implementing physical distancing with large student bodies in classrooms, common areas, and dorms; obtaining sufficient supplies of PPE (e.g., facemasks, face shields, gloves), disinfectants, and cleaning products; and transporting students to centers.

Job Corps told us it is currently developing criteria for contract operators to use in planning for resuming physical operations of centers when it is in the best interest of the health and safety of the students. These criteria will require

contract operators to follow CDC, federal, state, local and other guidelines when developing their center specific reopening plans. Job Corps will work with the centers to evaluate their preparedness to resume physical operations on a case-by-case basis taking all guidelines into consideration as well as the health and safety of students. The goal is to take the necessary steps to mitigate the possibility that a COVID-19 outbreak will occur at one of the centers. On April 29, 2020, as part of its planning for resumption of on-center operations in the future, Job Corps issued PIN 19-18 providing estimates for annual medical and oral health PPE needs for Job Corps health staff based on center size when undertaking pandemic planning, and providing routine medical and oral health services.

Extending Students' Time in Program

Closing on-center operations for months may result in students leaving the program and not returning to centers when the residential program resumes. Even if they do return, Job Corps told us that some might have challenges resuming their trade and basic skills learning. Further, other students may surpass the allotted amount of time they may remain in the program (i.e., age out).¹

To address this issue, Job Corps said it will grant extensions. To address the rest of the issues, Job Corps said it and center staff will continue to monitor and address the on-going needs of students as issues develop.

According to Job Corps, students in Advanced Training (AT) programs may be unable to become proficient in any required hands-on training. These students are being disproportionately impacted as the Workforce Innovation and Opportunity Act (WIOA) limits them to a maximum of three years of enrollment. Pursuant to WIOA at 29 U.S.C. § 3196(b)(4), Job Corps requested a 180-day extension of the enrollment limit for all students in AT programs. These enrollment extensions will enable Job Corps to mitigate the disproportionate negative impact of COVID-19 to students in AT programs and ensure that Job Corps resources are not wasted in unnecessary separations of students who are unable to complete AT before they reach the enrollment limit.

Recruiting New Students

Shelter-in-place and stay-at-home orders and recommendations imposed by at least 44 states and many local governments may have a negative impact on Job Corps' recruitment efforts. On April 24, 2020, Job Corps issued PIN 19-17 for

¹ Job Corps' age range is 16-24 years old. According to Job Corps, its most successful students stay in the program at least 18 months.

contractors to resume outreach and admissions efforts virtually. This includes, but was not limited to, file reviews; virtual contact with prospects, applicants, and enrollees; outreach to community groups and organizations; and planning.

Finding Jobs for Graduates

Job Corps' center operators and career transition services providers trying to find jobs for recent program graduates may face significant challenges due to a slowed economy resulting from the pandemic. Federal, state and local social distancing, and shelter-in-place and stay-at-home orders and recommendations temporarily shuttered businesses nationwide. According to DOL's Bureau of Labor Statistics (BLS), the unemployment rate in April 2020 increased by 10.3 percentage points to 14.7 percent — the highest rate and the largest over-the-month increase in the history of the data (available back to January 1948). On April 24, 2020, Job Corps issued PIN 19-17 for contractors to resume job placement services virtually.

CONCLUSION

The COVID-19 pandemic poses several challenges for Job Corps. Job Corps initiated a number of actions to mitigate health concerns and continue providing training, placement and outreach/admission services. These actions ranged from temporarily closing center campuses nationwide to deploying remote learning to nearly 30,000 students, and granting extensions to students who now need more time to complete their education and training. Still, other challenges remain, such as protecting the 445 students and essential staff who are still on center campuses. As of May 31, 2020, 4 students and 35 staff on centers tested positive for COVID-19. Job Corps also needs to ensure centers are properly prepared to reopen their campuses considering prevention guidelines for physical distancing, cleaning and disinfecting, and health monitoring, plus having an adequate stock of cleaning supplies and PPE. Job Corps faces more challenges with remote learning as many students do not have laptops or tablets, or even internet access, and need extra resources, equipment (e.g., power tools for carpentry trades), and hands-on instruction to learn. To address these challenges, OIG makes recommendations related to protecting the health of students and staff at centers and learning remotely.

OIG'S RECOMMENDATIONS

The OIG recommends the Assistant Secretary for Employment and Training require the following:

1. To safeguard the health of students and staff still at centers, Job Corps should continue to follow CDC, state, local and Job Corps' COVID-19 prevention and mitigation guidance.
2. Job Corps should continue monitoring the number of individuals testing positive, provide oversight to ensure the appropriate actions are completed, and take any necessary steps to contain the spread of COVID-19 at its centers.
3. Job Corps should ensure centers provide needed resources to address the learning needs of all students, including students who require reasonable accommodations, hands-on-instruction, and special equipment to learn.
4. Job Corps should develop a plan to help ensure all students still at centers and learning remotely have the necessary resources (e.g., laptops, paper packets) to continue to receive training while center campuses remain closed.
5. Prior to reopening campuses, Job Corps should ensure all centers have proper controls in place to adhere to federal, state, local and other guidelines – from physical distancing to having ample disinfectant, cleaning and PPE supplies.

SUMMARY OF ETA'S RESPONSE

The Assistant Secretary for Employment and Training generally agreed with our recommendations and said ETA has implemented and continues to implement the majority of them as the COVID-19 pandemic continues. ETA's written response to our draft report is included in its entirety in Appendix B.

We appreciate the cooperation and courtesies ETA extended us during this audit. OIG personnel who made major contributions to this report are listed in Appendix C.



Elliot P. Lewis
Assistant Inspector General for Audit

APPENDIX A: SCOPE, METHODOLOGY, & CRITERIA

SCOPE

This audit covered ETA's initial actions to address the risks and challenges presented by the COVID-19 pandemic as they relate to the Job Corps program.

METHODOLOGY

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

To answer our audit objective, we relied on INs, PINs, and press releases publicly available on Job Corps' website, interviews with ETA and Job Corps officials knowledgeable about the information and written responses to questions from ETA and Job Corps officials. We determined the information was sufficiently reliable for the purposes of this report.

Furthermore, we:

- Reviewed Job Corps' website, policies and procedures, and reports to obtain a general understanding of program operations.
- Reviewed prior OIG and GAO audit reports for issues related to our audit objective.
- Reviewed CDC guidance related to prevention, cleaning and disinfecting, schools, shared housing, and workplaces.
- Reviewed federal, state, and local government websites, as well as media reports, for COVID-19 data, stay-at-home and shelter-in-place orders, and other prevention guidance.
- Reviewed BLS' national unemployment data for our scope.
- Interviewed ETA and Job Corps' headquarter officials to obtain their input on challenges created by the COVID-19 pandemic on center operations,

as well as the actions ETA took to address them. We also sent detailed questions to ETA to get similar, but in-depth information.

- Reviewed national guidance related to the mitigation of COVID-19 within learning and shared living quarters' environments.
- Reviewed press releases, INs, and PINs Job Corps issued from March through May 2020 to determine the actions Job Corps took to address the various challenges caused by the COVID-19 outbreak.

Internal Controls

In planning and performing our audit, we considered Job Corps' internal controls relevant to our audit objective by obtaining an understanding of those controls, and assessing control risks relevant to our objective. We considered the internal control elements of control environment, risk assessment, control activities, information and communication, and monitoring during our planning and substantive phases and evaluated relevant controls. The objective of our audit was not to provide assurance of the internal controls; therefore, we did not express an opinion on Job Corps' internal controls. Our consideration of internal controls for administering the accountability of the program would not necessarily disclose all matters that might be significant deficiencies. Because of the inherent limitations on internal controls, or misstatements, noncompliance may occur and not be detected.

Criteria

- Workforce Investment Act (1998), which was superseded by the Workforce Innovation and Opportunity Act (2014)
- Job Corps' INs 19-08, 19-09, and 19-12
- Job Corps' PINs 19-14, 19-15, 19-16, 19-17, and 19-18
- CDC Interim Guidance for Businesses and Employers to Plan and Respond to Coronavirus Disease 2019 (COVID-19)
- Occupational Safety and Health Administration Guidance on Preparing Workplaces for COVID-19 (OSHA 3990-03 2020)
- National Strategy for Pandemic Influenza (Homeland Security Council, November 2005)
- Updated Preparedness and Response Framework for Influenza Pandemics (CDC 9/26/2014)
- CDC Interim Guidance for General Population Disaster Shelters During the COVID-19 Pandemic (5/14/2020)
- CDC Guidance on Considerations for School Closures (4/27/2020)

- CDC Interim Guidance for Administrators of US K-12 Schools and Child Care Programs (3/18/2020)
- CDC Interim Guidance for Administrators of US Institutions of Higher Education (3/17/2020)
- CDC Interim Guidance on Unsheltered Homelessness and Coronavirus Disease 2019 (COVID-19) for Homeless Service Providers and Local Officials (5/12/2020)
- CDC Interim U.S. Guidance for Risk Assessment and Work Restrictions for Healthcare Personnel with Potential Exposure to COVID-19 (5/10/2020)
- CDC Guidance for Reopening Buildings After Prolonged Shutdown or Reduced Operation (5/7/2020)
- CDC/EPA guidance for cleaning and disinfecting public spaces, workplaces, businesses, schools and homes (4/28/2020)
- CDC Considerations for Schools (5/19/2020)
- CDC Guidance – Prevent Getting Sick (COVID-19)

APPENDIX B: AGENCY'S RESPONSE TO THE REPORT

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



July 24, 2020

MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General for Audit

FROM: JOHN PALLASCH *J*
Assistant Secretary for Employment and Training

SUBJECT: Response to Office of Inspector General Draft Audit Report No.
19-20-00X-03-370 – *COVID-19: ETA Should Continue to Closely
Monitor Impact on Job Corps Program*

Thank you for the opportunity to respond to the draft Office of Inspector General (OIG) audit report entitled *COVID-19: ETA Should Continue to Closely Monitor Impact on Job Corps Program*, issued July 10, 2020. As the draft report recognizes, the COVID-19 pandemic has posed, and continues to pose, several challenges for the Job Corps program. The Employment and Training Administration (ETA) appreciates the OIG's recommendations focused on protecting the health of the Job Corps students and staff.

As outlined below, the Office of Job Corps (OJC) has implemented and continues to implement the majority of the OIG's recommended actions as the COVID-19 pandemic progresses. OJC has issued guidance to centers to mitigate health concerns consistent with guidelines from the Centers for Disease Control and Prevention (CDC), state, and local health agencies, and in compliance with the various stay-at-home or shelter-in-place orders as instituted by state and many local jurisdictions. OJC has also taken steps to ensure students have the necessary resources to engage in distance learning, and the program will continue to be responsive to students' needs. Finally, OJC will require Job Corps center operators to submit center-specific plans for resuming physical operations that address precautionary measures in accordance with CDC, state, and local health guidance. OJC will review the plans and approve centers to resume physical operations on a center-by-center basis considering the jurisdictional conditions in which the center is located.

ETA Responses to the OIG's Recommendations

OIG Recommendation 1: To safeguard the health of students and staff still at centers, Job Corps should continue to follow CDC, state, local, and Job Corps' COVID-19 prevention and mitigation guidance.

ETA Response: We agree in general with the OIG's recommendation. The Job Corps program has followed guidelines from the CDC, as well as applicable state and local health guidelines, to safeguard the health of students and staff. As the OIG recognized in its draft report, OJC has released several guidance documents pertaining to student safety and health and COVID-19,

which are aligned with and refer to CDC, state, and local health guidelines. This includes Program Instruction Notice (PIN) 19-12, *COVID-19*, issued in March 2020, regarding Job Corps' response to a potential COVID-19 pandemic. Two Information Notices (IN) were issued in April 2020—IN 19-08, *CDC Cleaning and Disinfection Recommendations*, and IN 19-09, *COVID-19 Positive Test Checklist*. All future guidance pertaining to student safety and health, including plans to resume physical operations, will be developed in consultation with CDC guidelines, in consideration of state and local health guidelines, and in close consultation with the OJC medical consultants.

OIG Recommendation 2: Job Corps should continue monitoring the number of individuals testing positive, provide oversight to ensure the appropriate actions are completed, and take any necessary steps to contain the spread of COVID-19 at its centers.

ETA Response: We agree in general with the OIG's recommendation. OJC has monitored, and will continue to monitor, the number of individuals testing positive for COVID-19. As the OIG recognized in its draft report, OJC issued standard operating procedures on April 3, 2020, outlining reporting and notification responsibilities when a center staff member or student tests positive for COVID-19. These procedures are active and assist OJC with ensuring appropriate actions are followed by the centers in accordance with their approved pandemic plans and Job Corps guidance, including PIN 19-12, IN 19-08, and IN 19-09.

OIG Recommendation 3: Job Corps should ensure centers provide needed resources to address the learning needs of all students, including students who require reasonable accommodations, hands-on-instruction, and special equipment to learn.

ETA Response: We agree with the OIG's recommendation. OJC has taken steps to identify students' needs to effectively participate in distance learning during Job Corps' virtual operating status. OJC conducted an Information Technology (IT) survey of active students on April 22, 2020, to determine accessibility to distance learning through either a computer/laptop or smart device. Currently, students who are unable to access distance learning via a computer/laptop or smart device are receiving instruction via paper packets mailed to them by the centers. This is an interim measure as student access to technology continues to evolve and change. OJC is procuring Chromebooks and wireless hotspot devices for the students to participate in distance learning.

Additionally, consistent with the requirements of Job Corps' Policy and Requirements Handbook (PRH), OJC required center operators to ensure students with disabilities have the opportunity to request and receive reasonable accommodations to participate in distance learning. Centers notified all students they have the right to request and receive reasonable accommodations that allow them to participate in the program, and the notice included contact information to assist students in making such a request.

OIG Recommendation 4: Job Corps should develop a plan to help ensure all students still at centers and learning remotely have the necessary resources (e.g., laptops, paper packets) to continue to receive training while center campuses remain closed.

ETA Response: We agree in general with the OIG’s recommendation. As previously stated, OJC has taken steps to identify students’ needs to effectively participate in distance learning during its virtual operating status. OJC conducted an IT survey of all active students to determine student need with respect to technology to participate in distance learning. Centers are expected to provide those who do not have a computer/laptop or smart device, or reliable internet access, with paper packets mailed by centers; and OJC is procuring Chromebooks and wireless hotspot devices for students who need a device, internet access, or both.

OIG Recommendation 5: Prior to reopening campuses, Job Corps should ensure all centers have proper controls in place to adhere to federal, state, local, and other guidelines—from physical distancing to having ample disinfectant, cleaning, and PPE supplies.

ETA Response: We agree with the OIG’s recommendation. As the OIG recognized in its draft report, on April 29, 2020, as part of its pandemic planning and resumption of on-center operations, OJC issued PIN 19-18 providing estimates for annual medical and oral health personal protective equipment needs for Job Corps’ health staff based on center size and requirements for providing routine medical and oral health services. Additionally, OJC has been working with Job Corps center operators to clarify the steps needed to safely return students to the centers. Presently, OJC is developing detailed guidance for all center operators to safely resume physical operations. This forthcoming guidance will consider CDC, Occupational Safety and Health Administration, and other expert advice from medical consultants to safely return, house, educate, train, and support students at the centers.

APPENDIX C: ACKNOWLEDGEMENTS

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