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Office of Inspector General—Office of Audit

**REPORT TO THE EMPLOYMENT
AND TRAINING ADMINISTRATION**



COVID-19: SAFETY AND REMOTE LEARNING CHALLENGES CONTINUE FOR JOB CORPS

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BRIEFLY...

COVID-19: SAFETY AND REMOTE LEARNING CHALLENGES CONTINUE FOR JOB CORPS

NOVEMBER 12, 2021

WHY OIG CONDUCTED THE AUDIT

In March 2020, Job Corps, administered by the Department of Labor's (DOL) Employment and Training Administration (ETA), suspended operations at 121 campuses and sent nearly 29,000 students home. Over the following months, Job Corps centers developed protocols to resume on-campus operations and transitioned from in-person to remote instruction.

This audit focuses on Job Corps' efforts to resume on-campus operations and teach students remotely in response to the COVID-19 pandemic. As of August 2021, on-campus operations had resumed at 113 centers.

WHAT OIG DID

We conducted this performance audit to answer the following question:

How did the COVID-19 pandemic impact Job Corps' efforts to safely and effectively educate its students?

To answer this question, we reviewed Job Corps policies, data, and documents; center resumption and remote learning plans; and related public health guidance. We also interviewed ETA and Job Corps staff and conducted virtual walk-throughs of two Job Corps centers that had resumed operations.

READ THE FULL REPORT

<http://www.oig.dol.gov/public/reports/oa/2022/19-22-001-03-370.pdf>

WHAT OIG FOUND

The COVID-19 pandemic had a significant impact on Job Corps' efforts to develop and implement protocols to safely resume on-campus operations and provide effective remote instruction.

While Job Corps established specific requirements for safely returning students and staff to centers, we found gaps in the oversight of its COVID-19 safety precautions for resuming on-campus operations. These included lack of site visits (virtually or in-person) to verify safety precautions were followed before and after centers resumed on-campus operations. As of July 2021, Job Corps brought students and staff back to 112 centers, but reviewed less than half of them for compliance with select safety requirements (e.g., masking; installing physical barriers). Instead, Job Corps relied on written explanations and declarations from centers.

Furthermore, since suspending in-person instruction and shifting to remote learning, Job Corps encountered many challenges ranging from an inadequate remote learning infrastructure to ensuring students had the resources to learn remotely. For example, more than 68 percent of its students needed basic tools, including computers and internet access. As such, Job Corps' student enrollment dropped 56 percent from March 2020 to April 2021; trades training completions dropped to zero from April 2020 to April 2021; and the average length of time it took students to complete the program more than doubled from approximately 8 to 18 months.

WHAT OIG RECOMMENDED

We made four recommendations to ETA focusing on continuing COVID-19 safety protocol development and monitoring, identifying and closing student learning gaps, and increasing oversight of remote instructional programs. ETA agreed with our recommendations and indicated the agency has already taken some actions to address them.

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INSPECTOR GENERAL'S REPORT

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Job Corps, administered by the Department of Labor's (DOL) Employment and Training Administration (ETA), provides academic, job, and social skills training to disadvantaged youth who face numerous barriers to employment. Job Corps also houses, feeds, and clothes students, as most live below the poverty line and/or receive public assistance.

This report presents the results of the Office of Inspector General's (OIG) audit of Job Corps' efforts to resume on-campus operations and teach students remotely in response to the COVID-19 pandemic. In March 2020, Job Corps suspended on-campus operations at 121 campuses and sent home nearly 29,000 students who resided on-site. Over the following months, Job Corps centers transitioned to remote learning and developed protocols to resume its on-campus operations.

In April 2020, OIG published a multiphase plan focusing on the DOL's response to COVID-19.¹ In July 2020, we issued a report describing the many hurdles Job Corps faced fulfilling its responsibility to train students and protect the health of everyone at the centers.² As part of this phase, we conducted this performance audit to answer the following question:

How did the COVID-19 pandemic impact Job Corps' efforts to safely and effectively educate its students?

¹ DOL. 2020. *Pandemic Oversight Response Plan*. Washington, DC: Office of Inspector General.

² DOL. 2020. *COVID-19: ETA Should Continue to Closely Monitor Impact on Job Corps Program*. 19-200-007-03-370. Washington, DC: Office of Inspector General.

We found COVID-19 had a significant impact on Job Corps' efforts both to ensure the safety of students when they started returning to in-person instruction and to provide an effective remote education. While it is too early to determine the long-term impact of COVID-19 on Job Corps students, the short-term consequences were significant. After centers stopped in-person instruction, Job Corps saw the following:

- Student enrollment dropped 56 percent from March 2020 to April 2021;
- Trades training completions dropped to zero from April 2020 to April 2021; and
- The average length of time it took students to complete the program more than doubled, from 7.6 to 17.7 months.

Job Corps is taking steps to mitigate these consequences. When Job Corps suspended its on-campus operations in March 2020, it also stopped enrolling new students. When Job Corps started returning enrolled students to campuses in November 2020, it prioritized bringing back students closest to completing their hands-on training so they could finish their educational requirements. Job Corps also granted all enrolled students a 10-month extension to complete the program. In April 2021, Job Corps issued a new virtual enrollment policy, allowing newly enrolled students to start their first 60 days remotely and then continue the program on campus.³ In that same month, according to Job Corps, almost 21,000 students applied to the program.

For our work, we analyzed Job Corps policies, data, and documents; select center resumption plans and remote learning plans; and other information. We also reviewed related public health guidance; interviewed ETA and Job Corps staff, including center officials; utilized questionnaires; and conducted virtual walk-throughs of two centers that had started resuming on-campus operations for adherence to Job Corps' related health and safety requirements. Our audit generally covered the period from March 2020 through August 2021.

RESULTS

We found gaps in Job Corps' oversight of its COVID-19 safety precautions for resuming on-campus operations. Moreover, there are many factors outside of Job Corps' control that may hinder its ability to safeguard students and staff on campus as the pandemic continues. For example, the Delta variant of COVID-19

³ Program Information Notice (PIN) 20-20, *Procedures for Virtually Enrolling Job Corps Applicants*, issued April 26, 2021.

is of increasing concern, as infection rates continued to rise during the summer of 2021.⁴ The United States (U.S.) Centers for Disease Control and Prevention (CDC) has reported the variant is more than twice as contagious as previous variants.

In addition, as with many school programs around the country, Job Corps was unprepared for the need to immediately—in March 2020—roll out a remote learning program. Since suspending on-campus operations at 121 centers and transitioning to remote learning in spring 2020,⁵ Job Corps encountered many challenges ranging from an inadequate remote learning infrastructure to ensuring students had the resources to learn remotely.

GAPS IN JOB CORPS OVERSIGHT OF COVID-19 SAFETY PRECAUTIONS AT CENTERS INCREASED RISKS

While Job Corps established specific requirements, such as reducing capacity and installing barriers to help with physical distancing, for planning a healthy and safe return of students and staff to campuses, we found Job Corps did not ensure centers met all of these requirements before approving them to resume on-campus operations. This and other oversight gaps will make it difficult for Job Corps to keep students and staff healthy and safe as the COVID-19 pandemic continues.

To understand Job Corps' efforts to return students to campus, we looked at Job Corps policies for resuming on-site center operations and interviewed ETA and Job Corps officials. We also judgmentally selected a center from each of Job Corps' six regions—three approved to resume on-campus operations (Atterbury, Jacksonville, and San Diego) and three pending approval (Guthrie, Philadelphia, and Westover) as of January 26, 2021—and reviewed their resumption plans. The Management & Training Corporation (MTC), Career Systems Development Corporation (CSDC), Heritage Services Corporation (HSC), and Alternate Perspectives, Inc. (API) operated these centers along with 28 other centers.⁶ We solicited feedback from these center operators through interviews and questionnaires.

⁴ The Delta variant was first detected in the U.S. in March 2021 and is now the predominant strain of the virus across the country.

⁵ Approximately 55 of 121 centers continued to house and feed students in need of assistance.

⁶ The remaining centers are operated under contracts or other agreements with various service providers, including businesses, Native American tribes, and nonprofit organizations.

DETERMINING HOW AND WHEN TO RESUME ON-CAMPUS OPERATIONS

In the months after it sent home nearly 29,000 students who resided on-campus, Job Corps worked to address two critical questions: how and when to resume its on-campus operations. Job Corps used a team of federal staff, contracted public health experts and consultants, data analysts, and facility managers to establish the methodology for evaluating and measuring risk and on-site readiness for returning students to campus.

On September 25, 2020, Job Corps announced its phased-in approach to start returning cohorts⁷ of students to campuses in fall 2020 and released a 25-page checklist that laid out specific requirements centers must execute before receiving approval to resume on-campus operations. One of the most important conditions was for each center to have a Job Corps-approved plan that described in detail how the center addressed each requirement. For example, the checklist required centers adhere to current CDC protocols, which at the time, included masking; social distancing; cohorting and staggering schedules; cleaning and disinfecting frequently; and installing physical barriers, such as sneeze guards and partitions.

Job Corps also required centers to develop protocols for quarantining and isolating students; consult and/or coordinate with its contracted public health experts and consultants on the state of its medical readiness; and coordinate with local medical facilities to ensure it could meet any potential COVID-19 medical needs.

According to Job Corps, it also considered other factors when approving which centers could bring students back on-campus, such as:

- Existence of an approved plan and corresponding budget;
- Verification of center readiness and implementation of the plan by a center operator official (e.g., corporate vice president);
- Campus size and location;
- State or local hospital admission, infection, and death rates;
- Number of new confirmed symptomatic student and staff cases;
- and
- Availability of COVID-19 testing supplies.

⁷ According to the CDC, cohorting means keeping people together in a small group and having each group stay together throughout an entire day. Cohorting can be used to limit the number of students, teachers, and staff who come in contact with each other.

Job Corps emphasized it could pause a center's on-campus resumption based on a change in its assessed risk level due to a number of factors, including local and state government mandates, center-specific issues, and/or an increase in positive COVID-19 tests at the campus. In short, Job Corps pursued a methodical and comprehensive planning process to safely return students to centers.

In November 2020, Job Corps approved 26 centers to begin resuming on-campus operations. By August 2021, this number had increased to 113 centers. Job Corps anticipates all 121 centers will have students on-site by the end of 2021.

JOB CORPS' APPROACH TO OVERSIGHT INCREASED SAFETY RISKS

Federal standards for internal control require building continuous monitoring into an entity's operations.⁸ While Job Corps paid considerable attention to establishing specific resumption requirements, its monitoring efforts fell short in some areas. We found Job Corps did not do the following to ensure compliance with safety protocols:

- Visit centers (virtually or in-person) to verify checklist requirements were followed before allowing at least 77 centers to resume on-campus operations.⁹ Instead, Job Corps relied on written explanations and declarations from centers. However, Job Corps told us some centers submitted photos along with their plans to show compliance.
- Reject center plans that did not address checklist requirements. Of the six plans we reviewed, four lacked details explaining how the centers intended to meet key requirements. For example, Job Corps approved one center's plan even though it lacked required social distancing guidelines that addressed physical contact, sharing items, and personal belongings.
- Conduct timely monitoring visits (virtually or in-person) to verify centers that resumed on-campus operations continued to follow checklist requirements. Instead, Job Corps relied on its regular Regional Office Center Assessments (ROCA) that generally occur once every 2 years, and Regional Office Targeted Assessments (ROTA), that are triggered by

⁸ Government Accountability Office. 2014. *Standards for Internal Control in the Federal Government*. GAO-14-704G. Washington, DC: Government Accountability Office.

⁹ On March 14, 2020, in response to COVID-19, the Office of Management and Budget issued travel guidance (M-20-14) limiting federal workers to only mission-critical travel.

various indicators of poor center performance to look for noncompliance. According to Job Corps, it did not have adequate resources to assess all of its campuses. Job Corps told us, as of July 2021, it had conducted 54 virtual and on-site assessments of its centers that resumed operations for compliance with select checklist requirements, which is less than half of the 112 centers that started returning students by that time. These infrequent assessments diminish Job Corps' ability to detect and correct COVID-19 risks timely, if at all.

As part of our testing, we conducted virtual walk-throughs at two centers that had started to resume on-campus operations using the center directors' cellphone cameras. At both campuses we looked at key areas, such as building entrances, hallways, classrooms, dormitories, trade shops, dining facilities, vehicles, and bathrooms, to determine if centers met checklist items. For example, we looked for the availability of disinfecting supplies and sanitation kits, directional signage and signage on floors for traffic flow and social distancing, and elimination of water fountains, among other requirements. Overall, we found both centers met all of these requirements, except for one: a water fountain at one campus was working and available for use in one of the trade shops, which violated one of the checklist items. The center director later reported changing all of the fountains on campus, including the one we observed, to water bottle refill stations with no spouts.

Job Corps' lack of emphasis on continuous monitoring, including virtual visits such as the two we conducted, created preventable oversight gaps. These gaps, along with the many factors outside of Job Corps control, such as increasing COVID-19 cases, differing local safety mandates, and varying vaccination rates throughout the U.S., diminished Job Corps' ability to maintain a safe environment for students and staff at campuses during the pandemic.¹⁰

The number of COVID-19 cases at Job Corps centers has been low during its gradual reopening: 2.3 percent of students were infected from November 2020 through June 2021. However, this may change as more students return, remaining centers resume on-campus operations, and new students arrive. This will test the controls put in place for student and staff safety, especially those related to social distancing, once centers become more crowded. That fact, combined with the gaps we found in oversight, keeping up with evolving CDC guidance, new COVID-19 variants, and varying vaccine rates across the country will make it a challenge for Job Corps to maintain a low center COVID-19 case rate.

¹⁰ For example, as of June 2021, only 18 states and territories still had mask mandates.

SIMILAR TO MANY SCHOOL PROGRAMS NATIONWIDE, JOB CORPS WAS UNPREPARED TO TRANSITION TO REMOTE LEARNING

In March 2020, out of an abundance of caution due to the increasing spread of COVID-19 and in accordance with CDC guidance, Job Corps suspended its on-campus operations, ceased all instruction, and sent approximately 29,000 students home. Similar to many school programs nationwide, Job Corps did not have a remote learning platform in place. When Job Corps transitioned its centers from in-person to remote instruction, it experienced a wide array of challenges, such as:

- Having to suspend critical aspects of its training programs;
- Ensuring students had the basic tools to learn remotely, including computers and internet access;
- Providing structure to students who were not acclimated to remote learning;
- Minimizing absences; and
- Preventing dropouts.

On April 24, 2020, amid recommendations and orders from 17 states and 2 U.S. territories, as well as at least 42 state stay-at-home orders, Job Corps announced it was continuing to cease on-campus operations and transitioning to remote learning on May 11, 2020.¹¹

Job Corps' mission is to provide academic, career, and technical education to students in order for them to obtain diplomas or credentials to get jobs and become self-sufficient.¹²

To understand the extent of Job Corps' efforts to train students in the midst of the pandemic, we looked at Job Corps' remote learning policies and interviewed ETA and Job Corps officials. We judgmentally selected and reviewed the remote learning plans for the same centers previously noted: Atterbury, Philadelphia, Jacksonville, San Diego, Guthrie, and Westover. We solicited feedback from their respective center operators through interviews and questionnaires.

¹¹ PIN 19-17, *Transition from Spring Break to Virtual Operating Status for COVID-19 National Emergency*, issued April 24, 2020.

¹² Workforce Innovation and Opportunity Act (WIOA), Pub. L. 113-128 (July 22, 2014).

JOB CORPS DID NOT HAVE THE INFRASTRUCTURE TO OVERCOME REMOTE LEARNING CHALLENGES

Similar to many school programs nationwide, Job Corps did not have an established infrastructure to deliver its entire education program remotely.¹³ As such, Job Corps worked with center operators to design and deploy remote learning plans that were consistent with contract requirements and program guidance covering academic and career technical skills instruction. Job Corps also developed remote learning protocols for students to follow that included helpful guidance for establishing a routine and identifying a space at home or other location for online learning, as well as requirements for meeting deadlines and due dates.

We found that when Job Corps initially announced the transition to remote learning, it was aware it could not perform key aspects of basic skills and technical instruction programs virtually. As detailed below, this resulted in the suspension of basic skills testing and career technical skills training.

For example, Job Corps uses a standardized test, Tests for Adult Basic Education (TABE), to assess students' math and reading levels for basic skills proficiency and qualify them for trades training. Students who score at or below the eighth grade level are considered basic skills deficient, receive remedial instruction, and retest until they pass. While remedial instruction continued, Job Corps resumed TABE testing slowly, with one center waiting almost 10 months before it was able to provide the test remotely, which hindered students' progress.

Further, many training skills require hands-on demonstrations of technical proficiency, such as automotive and machine repair, welding, carpentry, and advanced cement masonry. When on-site, students have access to training tools, materials, and instructor support. Centers developed innovative alternatives to in-person instruction, such as live-streaming instructor demonstrations and supplying material kits for students to practice at home. For example, one center mailed ingredients kits to culinary students. Via video, students were able to demonstrate their skills while instructors assessed their proficiency. However, for many students, the hands-on, skill-based portions of training were effectively on hold until they returned to campus.

According to one center operator, although a significant amount of online instructional content was available to reinforce certain skills, it was not a

¹³ DOL. 2020. *COVID-19: ETA Should Continue to Closely Monitor Impact on Job Corps Program*. 19-200-007-03-370. Washington, DC: Office of Inspector General.

replacement for on-site technical training. Overall, Job Corps' inability to deliver hands-on training delayed students' progress and completions. Job Corps data for April 2020 through April 2021 showed no students completed technical skills training.

To further help centers pivot to remote learning, Job Corps initially selected an online learning platform to streamline file sharing between teachers and students. However, Job Corps later found its chosen platform did not provide the analytics needed to monitor distance learning and switched to a different platform, which all centers are now required to use for remote learning.

Centers also used a number of other methods to teach students, including paper packets, other online platforms where teachers could load lessons and activities, online programs, and/or instructional videos on YouTube. According to one center director, when students had packet work, staff would talk, text, and/or email them every day. Staff also conducted home visits.

However, while these creative approaches helped some training continue, Job Corps still faced critical challenges ranging from ensuring students had the basic learning resources to learn remotely, such as laptops and internet access, to preventing students from dropping out of the program.

PROBLEMS PROVIDING LEARNING RESOURCES TO STUDENTS

In April 2020, before remote learning started, Job Corps surveyed its students to determine their access to devices, such as computers, cellphones, or tablets, to learn remotely. It concluded at least 21,553 students (74 percent)¹⁴ had access to a device and at least 3,804 students did not. A further look at the survey responses found 7,725 students initially thought they could use their cellphone or tablet. However, issues emerged when Job Corps began implementing remote learning, such as:

- **Cellphones were inadequate for online learning.** Job Corps reported students encountered difficulties using smartphones to access online learning applications. According to at least one center operator, many students who initially thought they could use their smartphones ran into serious problems with accessing applications.
- **Internet access was lacking.** Job Corps, center operators, and individual centers reported various access issues, including no internet at home, no service in rural areas, limited data plans, and internet overuse in

¹⁴ Using the number of students enrolled (29,000) as the denominator.

communities, which disrupted connections even at the campuses. For example, one center operator described how some students could only access the internet if they stood outside in the middle of their yards. In the early stages of implementation, Job Corps learned at least 8,247 students had insufficient internet connectivity.

- **Job Corps took months to issue laptops and internet connections to students.** Job Corps ceased in-person instruction in March 2020. Despite the results of the survey months later, in June 2020, Job Corps realized more than 68 percent of its students needed equipment and ordered 20,000 laptops and portable Wi-Fi hotspot devices with data. In September 2020, Job Corps ordered another 5,000 of each. Despite these efforts, some students were still without equipment months after centers ceased in-person instruction. While some delays, such as those caused by supply shortages and delivery service disruptions, were outside of Job Corps control, others were the direct result of Job Corps actions. For example, Job Corps took almost half a year to establish its student loaner device policies, which required students and parents/guardians (if students were minors) to sign usage agreements before receiving the equipment. One center received devices in July 2020, but had to wait for Job Corps to finalize its policies and then for everyone to complete their agreements. As a result, these students did not receive their devices until October 2020.
- **Usage agreements deterred students and parents/guardians from accepting loaner laptops and hotspot devices.** Usage agreements required students and parents/guardians (if students were minors) to agree to pay up to \$500 for lost or damaged equipment. Such usage agreements are common in U.S. school systems and are needed to establish responsibility and accountability. However, there were other factors to consider, such as cost and families' income levels. Passing potential damage costs of \$500 to low-income students (and parents or guardians) did not align with the rest of the program's no-cost provisions—free education, training, housing, meals, and health care—and deterred some from obtaining Job Corps-issued equipment. Three center operators stated some parents or guardians preferred not to assume the financial risks or be responsible for their children and refused to sign the agreements.
- **Mail service disruptions delayed receipt and return of paper packets.** Although Job Corps discouraged paper packets, center staff still used them, sending learning materials to students along with pre-paid return envelopes. Disruptions to the mail service due to COVID-19 delayed both deliveries and responses. Sometimes students waited weeks for a single packet or received multiple packets all at once.

- **Inability to locate students.** After Job Corps ceased on-campus operations and sent students home, center staff were initially unable to locate students and send learning materials, as students were scrambling to find places to live and could change residences on a daily basis.
- **Staff and students not acclimated to remote learning.** A center operator provided extensive training to staff, including how to access materials online and how to use a video camera. However, other center operators mentioned both students and staff struggled with basic technology competency, such as how to turn on laptops, keep laptops charged, and log in to various learning applications.

ISSUES PROVIDING STRUCTURE AND LEARNING SUPPORT TO STUDENTS REMOTELY

Many Job Corps students are high school dropouts and/or deficient in basic skills. Job Corps also serves students with emotional, behavioral, and/or learning disabilities. Without the structured environment centers provide on campus, which includes housing, food, and healthcare, as well as guidelines for daily routines, some students may not be able to adapt to remote learning and leave the program. While Job Corps has taken actions to mitigate these risks, the following concerns remain:

- Job Corps loosened its coursework completion timeframes from a fixed schedule to 24 hours a day, 7 days a week to better accommodate students' needs and abilities (e.g., students with work and/or family responsibilities). However, according to center officials, many students were not acclimated to remote learning and struggled with time management. This raised concerns that the added flexibility placed the responsibility on the student to proactively set a schedule themselves, which is what the on-campus experience would have provided for them.
- Students with disabilities are entitled to receive reasonable accommodations to enable them to participate in Job Corps, even in remote learning. Although staff are trained to identify if modifications to reasonable accommodations are necessary, Job Corps recognized students may not understand how and when to use the accommodations. As a result, there is a risk that the accommodation may not be as effective.

LAX OVERSIGHT OF REMOTE LEARNING

Job Corps acknowledged that in the early stages of remote learning, it did not have immediate oversight over the execution of plans and procedures. We found Job Corps oversight of centers' remote learning was lax.

For example, Job Corps developed and launched a module for tracking distance learning. However, Job Corps disclosed it had not fully utilized these reports for monitoring. Job Corps also did not specifically review students' training records to determine how students were progressing in remote learning. While Job Corps told us it reviewed some training records to determine progress, in general, it mostly relied on its regularly scheduled monitoring reviews—ROCAs—that generally occur every 2 years, as well as ROTAs.

In addition, Job Corps' staff observed classes in session, focusing on instructor and student engagement and if the course materials appeared appropriate. However, Job Corps acknowledged its staff are not educational experts and need to rely on their personal judgement to determine if the remote learning is effective.

MINIMIZING ABSENTEEISM AND DROPOUTS

After Job Corps sent students home, many faced circumstances beyond their control, such as working to support themselves or their families, lacking childcare, and/or caring for family members, that precluded them from solely focusing on completing their required coursework. Job Corps was aware that students might not return to campus and drop out. As a result, Job Corps revised a number of its policies to minimize these risks and accommodate these circumstances. For example, Job Corps extended its timeframes for completing the program, generally capped at 2 years, by 10 months. While this extension may still not be sufficient for students to complete the program as COVID-19 continues, the extension does provide students with needed flexibility.

In addition, Job Corps recognized there were circumstances when students might be unable to participate in remote learning, but would continue the program in person when campuses resumed operations. Job Corps revised its policies to allow students to temporarily separate from the program with the options to: (1) come back within 45 days of their campus resuming operations, or (2) immediately continue the program if they could participate effectively in remote learning. The number of students who selected these options increased from May through October 2020, when it peaked at 489 students.

Job Corps also expanded the timeframes for completing coursework to 24 hours a day, 7 days a week. On-site, students typically participate in 6 hours of direct

instruction a day. Job Corps recognized the challenging circumstances its students faced and sought to provide maximum flexibility for students during this time. It adopted the approach to allow students to complete their coursework at any point during the week, which could be regular intervals each day (similar to on-campus learning) or during irregular hours or irregularly throughout the week.

Job Corps also reduced the required hours students need to participate in learning activities. Prior to COVID-19, students were required to have 30 hours a week of direct instruction. Center operators reported it was challenging for students to meet the 30-hour requirement because many were now working full-time jobs to support their families or found themselves with additional caregiving responsibilities. In the last quarter of 2020, Job Corps data showed that students spent a median of 14 hours per week on remote learning.¹⁵ Recognizing the additional challenges students faced, Job Corps reduced the requirement to 20 hours per week.

Lastly, Job Corps increased the number of allowed absences before separating students from the program. Prior to the pandemic, Job Corps separated students if they had more than 6 consecutive unauthorized absences (UA) or more than 12 nonconsecutive UAs in the prior 6 months.¹⁶ To address varying student schedules and family and work demands during the remote learning period, Job Corps gave students an additional 5 UAs for online learning and an additional 10 UAs for students using mailed paper packets, to account for postal service delays.

CONCLUSION

Similar to many school programs nationwide, Job Corps was caught off-guard by the COVID-19 pandemic. Efforts to resume on-campus operations, while well planned, did not receive adequate oversight. Further, Job Corps was not prepared to transition to remote learning and experienced many challenges, including suspending basic skills testing and hands-on trades training; getting resources to students; providing structure and support remotely; and minimizing absenteeism and dropouts. The impact of COVID-19 on the Job Corps program may have lasting consequences.

¹⁵ PIN 20-17, *Weekly Distance Learning Participation Requirement*, issued April 12, 2021.

¹⁶ A student is considered in “Unauthorized Absence” status if they fail to return or report within 2 hours of their required attendance time either on site or off site.

OIG'S RECOMMENDATIONS

We recommend the Acting Assistant Secretary for Employment and Training require Job Corps:

1. Implement continuous monitoring to ensure centers adhere to Job Corps COVID-19 safety protocols (e.g., use of social distancing markers, installation of barriers, and reconfiguration of furniture to accommodate social distancing).
2. Develop and revise additional COVID-19 safety protocols as needed to align with current recommendations and advice from the CDC, other experts, and stakeholders to ensure the safety of students and staff at the campuses, including supporting efforts to attain a 100 percent vaccination rate for all students and staff.
3. Identify learning gaps that occurred during campus closures and procedures Job Corps needs to take to help students fill in those gaps.
4. Increase oversight of remote instructional programs to ensure students receive the training and resources to complete their programs in a timely way.

SUMMARY OF ETA'S RESPONSE

The Acting Assistant Secretary for Employment and Training agreed with our recommendations and indicated ETA and Job Corps have already taken steps to address some of them. These steps included remotely accessing centers' video surveillance systems to determine if they took required steps to prevent the spread of COVID-19; requiring students vaccinate or adhere to enhanced COVID-19 quarantine, testing, and masking requirements, based on the most up-to-date CDC guidance; and planning to procure a contract to develop its learning management system. 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.



Carolyn R. Hantz
Assistant Inspector General for Audit

APPENDIX A: SCOPE, METHODOLOGY, & CRITERIA

SCOPE

This performance audit covered Job Corps' efforts to resume operations at its campuses for in-person instruction and teach students remotely in response to the COVID-19 pandemic. Our audit generally covered the period from March 2020 to August 2021.

METHODOLOGY

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). 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 objectives.

To answer our audit objective, we reviewed Job Corps policies and guidance related to returning students to its campuses and providing instruction during the COVID-19 pandemic, as well as related public health guidance issued by the CDC and select states. We interviewed ETA and Job Corps officials and their contracted public health experts and facility managers. In addition, we judgmentally selected a center from each of Job Corps' six regions—three approved to resume on-campus operations (Atterbury, Jacksonville, and San Diego) and three pending approval (Guthrie, Philadelphia, and Westover) as of January 26, 2021—and reviewed their efforts to safely resume on-campus operations and teach students remotely. This included reviewing their respective resumption and remote learning plans and actions for adherence to CDC guidelines and Job Corps' policies. MTC, CSDC, HSC, and API operated these centers along with 28 other centers. We solicited feedback from these center operators through interviews and questionnaires. We also conducted virtual walkthroughs of two center campuses to verify the implementation of select Job Corps' safety protocols.

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

- CDC Guidance:
 - Cleaning and Disinfection for Non-emergency Transport Vehicles (April 14, 2020)
 - Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes (May 7, 2020)
 - Considerations for Events and Gatherings (July 7, 2020)
 - Social Distancing (July 15, 2020)
 - Cleaning and Disinfecting Your Facility (July 28, 2020)
 - Isolate If You Are Sick (August 12, 2020)
 - COVID-19 Guidance for Shared or Congregate Housing (August 22, 2020)
 - Preparing K-12 School Administrators for a Safe Return to School in Fall 2020 (August 26, 2020)
 - Operating schools during COVID-19: CDC's Considerations (September 1, 2020)
 - When to Quarantine (September 10, 2020)
 - Living in Shared Housing (September 11, 2020)
 - Indicators for Dynamic School Decision-Making (September 15, 2020)
 - Considerations for Institutions of Higher Education (October 5, 2020)
 - Interim Guidance for Case Investigation and Contact Tracing in Institutions of Higher Education (October 21, 2020)
 - Strategies for Protecting K-12 School Staff from COVID-19 (October 21, 2020)
 - Ensuring COVID-19 Vaccine Safety in the US (April 22, 2021)
 - When You've Been Fully Vaccinated (May 16, 2021)
 - Guidance for COVID-19 Prevention in Kindergarten (K)-12 Schools (July 9, 2021)
- Job Corps' PINs 19-14, 19-15, 19-17, 19-19, 20-01, 20-04, 20-05, 20-06, 20-08, 20-17, 20-18, 20-20, 20-21
- Job Corps Policy and Requirements Handbook Change Notices 19-15 and 20-02
- Workforce Investment Act (1998), which was superseded by the Workforce Innovation and Opportunity Act (2014)

APPENDIX B: AGENCY'S RESPONSE TO THE REPORT

U.S. Department of Labor

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



November 1, 2021

MEMORANDUM FOR: CAROLYN R. HANTZ
Assistant Inspector General for Audit

FROM: ANGELA HANKS **AH**
Acting Assistant Secretary

SUBJECT: Response to Office of Inspector General Draft Audit Report No. 19-22-XXX-03-370 – *COVID-19: Safety and Remote Learning Challenges Continue for Job Corps*

Thank you for the opportunity to respond to the above-referenced Office of Inspector General (OIG) draft audit report. As a result of the COVID-19 pandemic, Job Corps paused in-person operations in March 2020 and transitioned to distance learning until November 2020 when a return to in-person residential training started. The Employment and Training Administration (ETA) is pleased to report that Job Corps emerged from the changes brought about by the COVID-19 pandemic a more prepared program, which is better equipped to safely serve students in new and innovative ways.

Between November 2020 and August 2021, only three percent of all Job Corps students learning on Job Corps campuses tested positive for COVID-19.¹ This was achieved by establishing effective and comprehensive COVID-19 safety protocols to minimize community transmission and infections and with significant effort made by staff, center operators, and students to observe these protocols.

Additionally, while challenging to the Job Corps system, Job Corps' implementation of distance learning programs has led to new methods and strategies that will continue post the COVID-19 pandemic. Job Corps plans to continue initiatives such as virtual enrollment, which allows new students to complete the first phase of the program at home. With this new approach, Job Corps can blend its program design to meet the needs and expectations of the current generation of opportunity youth. However, ETA has received feedback from students and staff that, ultimately, in-person instruction is the best method to deliver the program.

On October 6, 2021, Job Corps published two new Program Instruction Notices (PINs) that establish requirements for Job Corps students to vaccinate against COVID-19 or follow enhanced quarantine, masking, and testing policies. These new requirements are more closely tied to current Centers for Disease Control and Prevention (CDC) guidance and build upon existing COVID-19 protocols, which strongly encourage vaccination and make arrangements for students to be vaccinated. These protocols also allow Job Corps to safely scale program enrollment closer to pre-COVID-19 pandemic levels. On October 15, 2021, Job Corps published

¹ The OIG's report cites a 2.3 percent figure from June 2021, prior to the surge of Delta variant cases nationwide.

two additional PINs resuming new on-center enrollment and welcoming non-residential students back to campus.

ETA agrees with all four of the OIG's recommendations below, most of which ETA addressed with the PINs published in October 2021.

Response to the OIG Recommendations

Recommendation 1: Implement continuous monitoring to ensure centers adhere to Job Corps COVID-19 safety protocols (e.g., use of social distancing markers, installation of barriers, and reconfiguration of furniture to accommodate social distancing).

ETA Response: ETA agrees with this recommendation, as Job Corps has taken this step and coordinates daily with center staff on how to adapt guidance to the current circumstances of the pandemic. However, the physical improvements cited in this recommendation, while important, are only one part of Job Corps' overall strategy for preventing COVID-19. Prior to returning to in-person learning in November 2020, Job Corps published PIN 20-08, which includes a comprehensive 25-page set of requirements addressing considerations such as COVID-19 testing and deep cleaning to managing student dormitory interactions and staggering schedules to prevent crowding. Job Corps requires all operators to meet these COVID-19 protocols and will continue to do so.

Job Corps has already taken steps in recent months to improve oversight of its COVID-19 requirements, including using innovative strategies to monitor centers when the COVID-19 pandemic has limited federal travel. In June 2021, Job Corps developed a regional review tool and technical assistance guide for Job Corps program managers and conducted targeted assessments to ensure that centers complied with Job Corps' COVID-19 safety protocols and other requirements related to resumption of on-center activity. In addition to a number of onsite assessments, Job Corps deployed a remote review protocol that leverages student focus groups, staff interviews, document review, and remote access to centers' video surveillance systems to assess their operations and determine if they have taken required steps to prevent the spread of COVID-19 and safely deliver services in Job Corps' residential learning environments.

Recommendation 2: Develop and revise additional COVID-19 safety protocols as needed to align with current recommendations and advice from the CDC, other experts, and stakeholders to ensure the safety of students and staff at the campuses, including supporting efforts to attain a 100 percent vaccination rate for all students and staff.

ETA Response: ETA agrees with this recommendation, as Job Corps has taken this step and coordinates daily with center staff on how to adapt guidance to the current circumstances of the pandemic. As noted above, on October 6, 2021, Job Corps published new policies regarding vaccination and on-center COVID-19 safety protocols that require students to either vaccinate or adhere to enhanced COVID-19 quarantine, testing, and masking requirements, based on the most up-to-date CDC guidance. These policies do not require students to vaccinate or face termination, as the student body includes young people who are housing insecure who could be displaced. However, the policies make clear that Job Corps strongly supports COVID-19 vaccination and requires centers to take steps that both encourage and facilitate vaccination to make the process as easy as possible for students. Job Corps also is coordinating with centers to

maximize each center's student vaccination rate and is working with a contractor to develop a marketing campaign to promote and strongly encouraging student vaccinations.

In September 2021, all staff at Job Corps centers became subject to an Administration policy requiring attestation of vaccination or a negative COVID-19 test within the past three days. In accordance with the most recent Administration policy, Federal staff at Civilian Conservation Centers must be fully vaccinated by November 22, 2021. This requirement to be fully vaccinated will apply to Job Corps centers' contract staff in December 2021. All center staff must continue to follow Job Corps' COVID-19 safety protocols requiring distancing, masking, and other measures meant to prevent the spread of COVID-19.

Recommendation 3: Identify learning gaps that occurred during campus closures and procedures Job Corps needs to take to help students fill in those gaps.

ETA Response: ETA agrees with this recommendation, as Job Corps already identifies these gaps as part of its normal operations and has taken additional steps to address any academic gaps resulting from the COVID-19 pandemic. By statute, Job Corps' purpose is to address skills deficiencies and academic gaps for opportunity youth. In July 2020, Job Corps implemented remote testing to identify gaps in students' reading and math skills. Further, Job Corps' high school diploma and equivalency programs include stages where instructors identify gaps and address them before student examination to complete these programs. Additionally, since students returned to center in November 2020, Job Corps' Career Technical Training instructors have looked for any student with academic gaps and recommended remediation, where needed. Thus, Job Corps is already identifying and filling learning gaps and will continue to do so.

Recommendation 4: Increase oversight of remote instructional programs to ensure students receive the training and resources to complete their programs in a timely way.

ETA Response: ETA agrees with this recommendation. Much of the OIG's report focuses on a seven-month period at the start of the COVID-19 pandemic in which Job Corps managed logistical challenges related to a sudden and unplanned shift from a mostly residential in-person learning model to becoming an exclusively distance learning program. As the OIG notes throughout its draft audit report, this was a difficult change for most American education institutions, not only Job Corps. However, Job Corps now has the infrastructure in place to accommodate remote learning, and Job Corps students have access to technology tools such as Chromebooks and hotspots, where needed, to complete coursework.

Job Corps plans to continue virtual enrollment to offer another method for students to complete the 60-day Career Preparation Period, the first phase of the program. For remote learning, Job Corps presently uses Google Suite Enterprise, which produces analytics monitoring student engagement and progress and offers breakout rooms to individualize student learning. Job Corps plans to procure a contract to develop its learning management system, which will ensure consistent, well-monitored administration of both in-person and remote learning. Job Corps' administration of its academic and training programs involves multiple providers and contractors, and this new system will allow Job Corps to centralize design and implementation.

APPENDIX C: ACKNOWLEDGEMENTS

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