

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.