

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.