APPENDIX D

AUDITEE RESPONSE TO REPORT

U.S. Department of Labor Office of Job Corps
Washington, D.C. 20210

JAN 1 4 2008

MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General
Office of Audit

FROM: ESTHER R. JOHNSON, Ed.D. *Esther R. Johnson*
Administrator

SUBJECT: Response to Performance Audit of the
Schenck Job Corps Civilian Conservation Center
Report No. 09-06-002-03-390

The Office of Inspector General's (OIG) performance audit of the Schenck Job Corps Civilian Conservation Center resulted in 14 recommendations. The Office of Job Corps concurs with the audit findings and corresponding recommendations for improvement shown in the report. Presented below are the OIG's recommendations along with the Office of Job Corps' (OJC) response. These responses were developed in conjunction with the USDA Forest Service National Director of Job Corps. Those responses cited with an asterisk are activities that fall outside of the jurisdiction of the Office of Job Corps to enforce and there is no mechanism to hold the USDA Forest Service accountable for noncompliance.

OIG Recommendation 1
Establish controls to verify costs submitted to DOL are accurate by reporting on an accrual basis of accounting in accordance with the PRH, recording costs in a timely manner, and classifying costs correctly.

OJC Response
* The USDA Forest Service (FS) National Director of Job Corps will direct the Schenck Job Corps Civilian Conservation Center staff to establish controls and verify costs submitted to DOL are accurate by reporting cost on an accrual basis per the Job Corps PRH, recording costs in a timely manner, classifying costs correctly and ensure the costs reports (2110F) are reconciled to the FS ledger.

The National Office of Job Corps has instructed the Atlanta Regional Director (RD) to provide technical assistance and training to FS headquarters and center staff as requested. The Atlanta Regional Director will also ensure the Atlanta Regional Program Manager (PM) will monitor the 2110F reports submitted by Schenck.

OIG Recommendation 2
Maintain copies of all contracts supporting the center, such as the Center Welding Contract, and only authorize and approve payments as specified in the contract.

OJC Response
* The USDA FS National Director of Job Corps will ensure that both the Schenck staff and all other appropriate FS staff responsible for these procedures maintain all copies of contracts supporting the center and only authorize and approve payments as specified in the contract.

The Atlanta RD will monitor compliance through desktop monitoring, site visits and annual center assessments.

OIG Recommendation 3
Discontinue the practice of bypassing Human Resources and the Government Contracting Officer, regarding personal services contracts, when hiring temporary employees.

OJC Response
* The USDA FS National Director of Job Corps will direct the Schenck staff to follow all Federal Human Resource and/or government contracting procedures when hiring temporary employees.

OIG Recommendation 4
Follow PRH prescribed internal controls governing expenditures for non-personal service and contracts to ensure all future expenditures are supported by a proper invoice, comply with Federal Acquisition Regulation (FAR) guidelines, support the Job Corps mission, and are properly recorded into the General Ledger.

OJC Response
* The USDA FS National Director of Job Corps will ensure that Schenck and all other FS staff responsible for these tasks follow the appropriate Job Corps policies to ensure all future expenditures are supported by a proper invoice, comply with Federal Acquisition Regulation guidelines, support the Job Corps' mission, and are properly recorded into the General Ledger.

OIG Recommendation 5
Expeditiously deposit all cash received on center from the sale of meal tickets and student-assessed fines for government property lost or damaged and ensure these funds are credited back to the center cost category that purchased the material, as required by the PRH.

OJC Response
* The USDA FS National Director of Job Corps will ensure that staff follow the appropriate PRH policies and ensure collected funds are deposited and credited back to the center in an expeditious manner.

The Atlanta RD will monitor compliance through site visits and annual center assessments.

OIG Recommendation 6

Review the questioned costs of $171,719 addressed in this report and as appropriate, lower future year operating budgets for costs that do not benefit the Job Corps program and its students.

OJC Response
* The USDA FS National Director of Job Corps will review the questioned costs to ensure the expenditures were appropriately charged in support of the Job Corps program. The FS will report the findings of this review to the Atlanta Regional Director.

OIG Recommendation 7
Require center management to comply with the center's own student accountability system and policies and improve the process for using the center's current serialized sign-in/sign-out log, bed check procedures, student morning sign-in process, and recording student class attendance. The improvements should extend to the overall process used to create the Center Morning Report to allow center management to know the whereabouts of all students at all times.

OJC Response
* In August 2007, Standard Operating Procedures were installed by the FS to prevent a recurrence of this issue. The USDA FS National Director of Job Corps will ensure the procedure is followed by all FS center directors. USDA FS Log Book has been installed on center and will mirror attendance data recorded in CIS. Date of implementation: August 2007, attachments A, B, C, & D. USDA FS personnel will conduct an initial review of this process during a monitoring visit in November, 2007 attachment E, trip report.

The Atlanta Regional Office will monitor compliance through desktop monitoring, site visits and annual center assessments.

OIG Recommendation 8
Retain student accountability data and documentation as required for a period of no less than 3-years.

OJC Response
* In August 2007, multiple Standard Operating Procedures were installed by the FS to ensure data integrity compliance and quality. The FS center directors will be required to store student accountability documentation for no less than 3-years. USDA FS personnel will review compliance with this review in November, 2007. USDA FS personnel will conduct an initial review of this process during a monitoring visit in November, 2007 attachment E, trip report.

The Atlanta Regional Office will monitor compliance through onsite monitoring visits and annual center assessments.

OIG Recommendation 9
Require in accordance with the PRH, that all student leave granted by center management be reasonable, supportable, and allowable.

OJC Response
*   In August 2007, Standard Operating Procedures were installed by the FS to prevent a recurrence of this issue. The FS center directors will be required to comply with the PRH requirement that all student leave granted by management is reasonable, supportable, and allowable. Electronic documentation (CIS) and hard-copy documentation (student files) will also be maintained and synchronized. Attachments: F, G, H, & I. These safeguards will ensure that hard-copy data mirror data in CIS.

The Atlanta Regional Office will also monitor compliance through desktop monitoring, site visits and annual center assessments.

OIG Recommendation 10
Immediately terminate students in AWOL status for 6-consecutive training days or those students with 12 AWOL training days within a 180 consecutive day period.

OJC Response
*   In August 2007, Standard Operating Procedures were installed by the FS to prevent a recurrence of this issue. The USDA FS National Director of Job Corps will terminate all appropriate students in AWOL status for 6-consecutive training days or those students with 12 AWOL training days within a 180 consecutive day period and report compliance to the Atlanta Regional Director. Additionally, USFS personnel will review compliance with this review in November, 2007 on site. CIS training, if required, will be provided with respect to AWOL tracking.

The Atlanta Regional Office will determine if the students were terminated and report to the National Director of Job Corps and will continue to monitor compliance through desktop monitoring, site visits, and annual center assessments.

OIG Recommendation 11
Require center management to attempt to contact all AWOL students and to record all attempts and contacts in the student's file.

OJC Response
*   The FS National Director of Job Corps will direct the Schenck Job Corps Center staff to immediately attempt to contact all AWOL students, record all attempts and contacts in the student's file, and report the outcomes to the Atlanta Regional Director.

The Atlanta Regional Office will review the appropriate student files at the next site visit and monitor compliance through desktop monitoring, site visits, and annual center assessments.

OIG Recommendation 12
We recommend that the Atlanta Regional Job Corps Director direct his Program Manager responsible for the oversight of Student Accountability at the center to review Center Information System (CIS) reports for students in AWOL status. We further recommend that each instance where the AWOL rules are violated that the Program Manager

authenticate that the center complied with the mandatory student termination as outlined in the PRH.

OJC Response
The National Office of Job Corps will work with the Atlanta Regional Office to review CIS reports for students in AWOL status and identify instances where the center did not comply with the PRH. A report outlining the findings will be provided to the FS National Director of Job Corps, along with recommendations on how to hold the Schenck Job Corps Civilian Conservation Center accountable for any questionable findings.

OIG Recommendation 13
The USDA Forest Service Job Corps National Director of Field Operations should direct his Project Manager responsible for the oversight of Student Accountability at the center to review the Center Information System (CIS) reports for students in AWOL status. We further recommend that for each future instance where the AWOL rules are violated that the Program Manager authenticate that the center complied with the mandatory student termination as outlined in the PRH.

OJC Response:
The Atlanta Regional Director will submit a directive to the FS National Director, requesting they review the CIS reports for students in AWOL status and prepare a report of their findings. The FS Office will then work with the Atlanta RD to reconcile the findings from each office.

* In August 2007, Standard Operating Procedures were installed by the FS to prevent a recurrence of this issue. The USDA FS National Director of Job Corps has committed to enforcing the procedure and ensuring all FS center directors comply. Compliance by operator: On July 25 and 26, 2007, the USDA Forest Service Job Corps National Director, through his program staff, delivered a two-day training to center directors with respect to AWOL tracking, data integrity, and zero tolerance for non-compliance across topics raised in the initial OIG draft as released to USFS on July 12, 2007.

OIG Recommendation 14
The Atlanta Regional Job Corps Director and US Forest Service Job Corps National Director of Field Operations should intensify monitoring efforts at the center. For all future visits to the center, Job Corps Regional and FS personnel should validate that center's student accountability process to verify that center management knows the whereabouts of all students at all times.

OJC Response:
* The FS National Director of Job Corps will increase monitoring efforts and ensure all FS center directors comply with all PRH requirements. The Atlanta Regional Director will also increase monitoring efforts to ensure compliance with the PRH.

Thank you again for the time and commitment given by you and your staff to improving the Job Corps program.

ATTACHMENT A
SCHENCK JOB CORPS

Policy, Requirements and Procedures

Control Number: PRH 6.1 SK-002   **Effective Date:** AUGUST 1, 2007

Filing Instructions: New ( )   **Supercedes:** (December 18, 2000)

Subject: After-hours Accountability

Purpose: The purposes of accountability are as follows:

1. To establish a uniform system to account for and document the whereabouts of students during their Job corps enrollment.

2. To establish a uniform system to report and respond to unauthorized student absences.

Requirements and Responsibilities:

1. An exact accounting of the status of all students assigned to the dorm is required. This includes students both on and off center. Accountability information is recorded in Dorm Electronic Logbooks and on Bed Check sheets.

2. A physical count of students must be done to ensure all students are present or otherwise accounted for. A bed check will be done immediately after midnight and a headcount done thereafter until wake up. Students must be in assigned bed areas. Some part of each individual must be visible. Bed checks will be logged on Bed check sheets twice between the hours of 0000 and 0600.

3. Accountability during the day and evening hours will be as follows:

Monday - Thursday   1800 and 2300
Friday   - 1800, 2000 and 2300
Saturday - 1100,1800,2000 and 2300
Sundays/Holidays 1100, 1800 and 2100 (2000 on 2nd Sunday of the month)

Expected Outcomes:

1. To track and document the whereabouts of each student.
2. To establish a record system for daily notification of the dorm staff of each student's duty status.
3. To encourage and promote regular attendance, and identify absences, missed appointments and tardiness.

Quality Indicators:
1. Students can articulate the importance of regular attendance and understand the consequences of absences.
2. Staff actions encourage support and enforce center attendance rules.

Approved: */s/ Raoul Gagne*
          Center Director

ATTACHMENT B
SCHENCK JOB CORPS CIVILIAN CONSERVATION CENTER
SERIALIZED REGISTER

Page No. 100

	Print Name	Signature	Date	Status	Time Out Indicate AM or PM	Time In Indicate AM or PM
1.						
2.						
3..						
4.						
5..						
6.						
7.						
8.						
9.						
10.						
11.						
12.						
13.						
14.						

ATTACHMENT C
SCHENCK JOB CORPS

Policy, Requirements and Procedures

Control Number: PRH 6.1 SK-001   **Effective Date:** AUGUST 1, 2007

Filing Instructions: New (X)   **Supercedes:** (December 18, 2000)

Subject: Center Log Book

Purpose: To outline methodology for utilization of logbook as critical communication tool in center operations.

Requirements and Responsibilities:

The center log book is a communication tool to other staff. Also, it is a tracking device and the main accountability tool to track students departing and arriving on Center. Sometimes, the time becomes an important factor in solving a problem. Therefore our entries in the Center Log should be accurate.

Entries should be complete enough for others unfamiliar with the situation to be able to understand what happened. Be sure to initial each entry in the Log. Keep in mind that everyone has access to read the Log (including students). Confidential information should be communicated by other means. It is possible to log an event and give more detailed communication separately to specific concerned individuals.

An all inclusive list of entries that should be made is not practical. However, the following list of expectations should give a good idea of what information to enter:

- Center Sponsored trip leaving Center - The staff taking the trip has the responsibility to make a log entry to include driver's name, Vehicle #, destination, cell phone # if applicable, purpose of trip, and the name, dorm and color of the students.

- Center Sponsored trip returning to Center - The driver returning has the prime responsibility to make a log entry. The entry is to indicate the staff returning, from what trip, and who is returning with the trip, plus any problems that may have been encountered on the trip.

- Students Departing From Or Returning To Center - These are to be indicated in the log book. Info required at minimum: AWOL students, new and/or transfer students need to be logged in.
  1. If students are departing Center by their own transportation (POV) for the day only, a log entry is appropriate - indicating method of departure, with whom, name of student and expected time of return. Upon return, a simple log entry indicating the student is back on Center is adequate.
  2. If a student departs center POV for overnight or longer, then log entry should

indicate all of the items above and their status during their absence.

- Ill or Injured Students - When a student so seriously injured or ill that medical advice is needed, log entries will be made. A thorough paper trail is expected. Log phone calls attempted or successful. Log student's name, a description of the injury or illness. Log decisions made as to course of action taken.

- Law Enforcement - If activities on or around Center end up involving the Sheriff or other Law enforcement officials, log entries are appropriate. A general description of the situation should be noted. If the law enforcement action is taken, then log name. TO CALL LAW ENFORCEMENT ON CENTER REQUIRES SHIFT SUPERVISOR OR HIGHER APPROVAL.

- Fires - Any fires serious enough to cause property damage or injury to personnel or students is serious enough to log in the center log book. Give enough information so as to give a clear picture of what took place, decisions made, actions done, and damage done (or not done). If major damage or injuries occur, it is MANDATORY to notify the Center Director of Acting during the process of handling the situation.

- Maintenance - If maintenance is needed of such serious nature as to call staff from other departments during their time off, log such events. Describe problem, person's calls, and actions taken.

- Night Person Entries - Staff on duty from midnight to 0830 have a number of entries that are to be made. A dorm accountability notation verifying the number of students on Center by form is required. Also, enter each dorm circulation, each facilities security circulation, entries signing on duty at the beginning of the shift and off duty at the end of the shift, and entries of special wake-ups (KPs, cooks,)

There are numerous other events occurring on center and in the dorms for which other forms of communications other than the Center log are much more appropriate. E-mail, Sharepoint, Dorm logs, notes to staff, student behavior reports, counseling referral forms, maintenance request forms, talking to persons directly, etc. A good operating guideline to use is that you probably can't communicate too much. One of our main sources of shared information on Center is our Center log - use it!

Expected Outcomes:

Center log book is neat, accurate and professional. It consistently reflects accountability status change and documents major events on Center.

Quality Indicators: Staff actions encourage, support and enforce Center accountability requirements.

Approved: */s/ Raoul Gagne*
   Center Director

ATTACHMENT D

Centers must have a Quality Assurance Data Integrity Plan (QAP) to address how the center will monitor, validate, audit, and conduct training on the center's student data, finance, purchasing, and property procedures.

The center must communicate the importance of data integrity:

➤ All staff must have a common understanding of data integrity.
➤ Clear support from the TOP of the organization. If TOP management staff do not support data integrity, the line staff will not support data integrity, it's as simple as that.
➤ Consequences for non-compliance.

Listed below are key components of what should be in your QAP. Also listed below is a SOP template that is very generic and should be used to assist the center in developing a Quality Assurance Plan:

The four key components of your centers Quality Assurance Plan (QAP):

1. Your plan must address the extent to which oversight, monitoring and assessment will be applied to ensure program compliance and quality.

2. Your QAP must identify how the agency will validate the accuracy and integrity of student outcomes and financial data.

3. Your plan must address how quality assurance activities will be managed and what corrective action will be taken to maintain outcomes and quality standards.

4. Your plan must describe the degree to which the agency documents the results of inspections, tests, audits and any program assessments conducted.

Program areas that should be included in your centers QAP:

5. Finance
6. Property Procedures
7. Purchasing
8. Student Data
   a. Validating admission data
   b. Program accomplishments
   c. Student placement data

Key components of center QAP:

9. Written procedures on validating student data during enrollment:

   d. Current accountability SOPS
      ➤ Designation of authority.
      ➤ Center Training Calendar

> ➢ How student leaves are processed and approved.

   e.   Written procedures on Vocational TAR updates.
   f.   Written procedures on TABE/GED testing procedures and recording.

10. Frequency when student data will be reviewed/audited:

   g.   By the Center
   h.   By the individual Center Department, i.e. CTT, Academics, records, counseling, etc.
   i.   By the Agency

11. Staff Training:

   j.   Comprehensive training for all staff:
        ➢ PRH requirements
        ➢ Internal procedures
        ➢ Frequency of Training
        ➢ Standard part of new employee training

12. Internal Controls:

   k.   Designate an individual with responsibility at the center level:
        ➢ For Quality Assurance Plan
        ➢ For establishing and updating internal procedures
        ➢ For monitoring data integrity.

   l.   Identify who should verify (double check) data before entry into data systems:
        ➢ All leaves
        ➢ GED/HSD certifications
        ➢ Vocational completions

        (Must be a different person from the one generating the leave, certification, etc.)

Center Quality Assurance Plan

A. PURPOSE

To establish a standard operating procedure for the _____ Job Corps Center that ensures data integrity.

B. POLICY

1. The Generic Job Corps Center is committed to high ethical standards and integrity in all operations as confirmed by the center's mission statement and the center's published goals.

2. The Generic Job Corps Center's commitment to data integrity is demonstrated through its established procedures for identifying and correcting data integrity errors that are discovered through the center's auditing processes.

C. PROCEDURES

Center Director

1. Ensures compliance with the Bureau of Reclamation (BOR), the center and Job Corps ethical standards.

2. Ensures that training on data integrity is provided to all center employees.

3. Ensures specific training for facility department managers and supervisors on departmental data integrity requirements.

4. Contacts the center's Bureau of Reclamation Project Manager upon identification of data integrity concerns.

5. Submits corrective action plans and follow up to the centers BOR project manager

Director of Career and Technical Training (CTT), Manager of Academics, Work Programs Manager, Residential Living Manager, Counseling Manager, Health Services Manager, Center Standards Officer, and Student Records.

6. Directors/managers will conduct a quarterly compliance and quality audit of their respective area to include a review of CIS case notes. This will include at a minimum 25% separated and 25% active student files.

7. Document monthly compliance and quality audits in each department area by requiring departments to conduct 100% audit of separated files and 30% audit of active files including CIS case notes in each area.

8. Departments will create a corrective action plan that addresses audit issues. Departments will also submit follow up responses to the center director, by the third week of each month.

9. The individual directors and managers will meet with their respective departments and/or managers will meet with their respective supervisors to review audits and corrective action plans prior to submission to the center director and BOR project manager.

10. The directors and/or managers will meet with the Center Director to discuss any pertinent issues related to the findings of the audit.

11. The directors and/or managers will meet with departmental staff and review audit findings and corrective action plans.

12. The directors, managers or departmental staff will ensure appropriate correction of all identified errors using the Data Integrity Error Correction Form when appropriate. The error correction form will be forwarded to student records for the correction to take place.

13. The directors and/or managers will ensure follow up on corrective action plan components.

14. The directors and/or managers will maintain a copy of the quarterly/monthly audits in the respective department files.

Student Records

15. The student records department will conduct a <u>monthly</u> 100% audit of all separated student permanent records, and 30% of all active student files, to include case notes for both separated and active student files.

16. Documents identified errors and omissions.

17. Discusses with appropriate managers and/or student records staff, identified errors and omissions.

18. Create a corrective action plan that addresses audit issues connected with student records functions. Submit follow up responses to the center director, by the third week of each month.

19. Ensure appropriate correction of all identified errors using the Data Integrity Error Correction Form when appropriate.

20. Maintain a master error correction log in student records for all departments.

21. Copies of the error correction form will be placed in the active and separated individual student's personnel file.

22. Maintains a copy of the monthly audits in the respective department file.

Center Data Integrity Administrator

23. On a quarterly basis, conducts a random audit of outreach and admissions files submitted to the center for data integrity compliance.

24. On a quarterly basis, conducts a random compliance and quality audit in each area, including review of CIS case notes.

25. On a weekly basis conducts a random review of Training Achievement Records (TAR) prior to submission to the records department.

26. Assists departmental directors/managers in creating a corrective action plan that addresses audit issues.

27. Meets with department directors/managers and reviews audit findings and corrective action plans.

28. Ensures follow up on corrective action plan components.

29. Conducts targeted audits of completed departmental data integrity audits.

30. Conducts training for departmental directors, managers and supervisors on departmental data integrity and accuracy requirements.

31. Performs random audits of TAR's in selected Academic classrooms/Career and Technical Training classrooms to include CIS case notes.

32. Randomly monitors all classrooms to ensure staff are in compliance with National Office Data Integrity standards.

33. Meets with the Center Director to discuss any pertinent issues related to the findings of the departmental audits.

34. Semi-yearly conducts targeted audits using information obtained from CIS and EIS. Uses information obtained from completed center data integrity audits and annual ROCCA assessments.

35. Assists as requested, the center in conducting training for departmental directors, managers and supervisors on departmental data integrity and accuracy requirements.

36. Assists as requested, the center in conducting training on data integrity to all center employees.

37. Conducts technical assistance to selected center staff and departments on data integrity as requested.

ATTACHMENT E
Schenck Civilian Conservation Corps
USFS Agency Initial Site Visit by Program Manager
Trip Report
November 5-7, 2007

Larry Dawson, National Director
Louis Black, Deputy Director
Gerard O'Hare, Program Manager

Background

The new Program Manager conducted an initial site visit to establish a base-line understanding of Schenck staff and students – and this in the wake of two recent and negative reviews of center operations, one by the US DOL, Atlanta Region, and one by OIG, DOL. With responses due to both reports, the intent of this report was to (a) take a snap-shot of student-staff culture and (b) to provide initial technical assistance with respect to implementation of programmatic responses (COP's and SOP's) generated to address concerns and shortcomings identified by OIG.

By October 1, 2007, Schenck's OMS rankings and ratings had fallen steadily, and the OMS-10R for October, 2007 saw the center decline into 113th place overall.

Career Preparation

Rolling OBS for the center stood at 90% overall, with only a 55% female OBS. The center is encouraged to work directly with DOL Atlanta and with OA providers to address both issues.

The center is encouraged to maintain a 30 day CPP program that includes, in addition to the PRH requirements, intensive and structured presentations by both TEAP and all counselors: many new arrivals report being unaccustomed to structured environments and will need help adjusting to and meeting our requirements in behavior, dress, and time management. At the same time, the center should review the current policy whereby new students enter one dorm and are then disbursed to another post CPP.

Career Development Period

Standards

- Student dress codes need to be tightened, explained to and negotiated with the student body through the SGA, embodied in the handbook, then enforced center-wide. It is recommended that all jewelry be banned during the work day in all areas and that any violations lead to permanent removal of the same for individuals or the group, depending on the extent of policy violation. (A similar policy should be discussed with SGA with respect to cell phones.)

Dress code must be rooted in employability at all times, including weekends, and during off-center trips and community events. The students represent the center in the community. (OA needs to understand and explain any new policies to future enrollees.)

- Students in academics and vocations need to dress in appropriate uniforms at all times, without exception. Staff does not consistently enforce dress and safety. The vocational and academic managers are responsible for spear-heading this policy in the work day.

- Clothes that sag should not be purchased using center funds. Clothes issued from the warehouse should reflect only one criterion: they must fit. Clothes purchased externally should follow the same, single criterion.

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- Literature and web sites, as well as information to OA providers, should cite what is and what is not allowed on center: simple rules, simply enforced.
- Social Skills Training needs to underpin and define the work day; but SST must also be taught in a significant and rigorous fashion – perhaps during weeknight study sessions in the dormitories. Staff could not outline or detail the current SST program.

- While many staff members are impatient for change and, in some cases, for former structures, many of those same staff members do not currently and actively confront staff and students who are in violation of center standards. In advance of normative culture training, all staff members must begin to assert themselves with the student body, day-in and day-out.

- Certain staff members do not dress professionally and must do so at all times. Business casual has been, and remains, the minimum standard in Job Corps; and this policy pre-dates the CSS program as mandated by DOL in 2005-06. Leisure wear and sporting wear are not appropriate for an employment and training environment.

Academics
- Classrooms must never be locked. Discipline and classroom management do not involve locking doors.
- Male bathrooms in the academic building were consistently filthy. It is recommended that male students clean the facility hourly, by rotation, and with inspection, until the situation improves. This is not a group punishment; rather, it is an attempt to make the young men in academics take responsibility for their own surroundings.
- Again, students do not comply at all times even with the stated dress code.
- In the absence of one teacher, the program manager occupied a classroom for approximately 90 minutes. The following observations were made:

1. The classroom was dirty and disorganized; the students therein were bored and the teacher failed to provide a lesson plan for any substitutes.
2. Student folders were covered in gang-style graffiti and obscenities.
3. The windows were shut tight with nails and cardboard, and leaked heavily.
4. Neither staff nor student personalities and interests were on display via projects or achievements on walls and bulletin boards.
5. The room was cold, obliging students to wrap themselves in oversized outdoor wear that impede learning and work against employability.
6. Of the 10 students in the class, 4 were simply doing nothing and 6 were trying to teach themselves. 1 student was still wearing an ear ring after being told previously to remove it. 2 students arrived late and demanded passes; both refused to explain why they needed passes and were denied the same; one of the two walked away.
7. 4 of the students were poorly dressed and not well-groomed. Staff must be prepared to address such sensitive issues both with individuals and with groups. Good hygiene is a critical life skill, and apt material for formal and informal SST

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and dorm meetings. Students should begin their work day with clean clothes, tidy hair, and appropriate appearance.

8.   Staff should monitor all movement within the building at all times. Students should not be used to ask or tell their roaming peers where they should be at a given time.

9.   Accountability must be taken and adhered to within CIS. Students who cannot be located should be coded as AWOL – as explained to both training departments. Staff members <u>do</u> have access to CIS; they now have to use it.

By developing more structured learning, by further engaging the students in each and every class, staff can hold students more accountable and students, in turn, will behave more appropriately. Details matter.

Vocations

A pre-on-site analysis of separated folders revealed a major break-down in vocational management. Interpersonal strife is not being addressed and is therefore not being resolved; TAR's are not being evaluated on a regular basis and the vocational staff who complete those TAR's are not being held responsible for the quality of their work. This is not a generalization.

- TAR review does not occur.
- Vocational instructors are not receiving in-class formal and informal evaluations of student progress on the TAR's. Nor are they receiving ongoing training in TAR completion and critical data reports in JCRL and CIS.
- Some students are not entered into their initial trade on time – out of CPP and into trade.
- Too many students are permitted to change trades after the CIS trade window has closed. Students should complete one trade before entering another – period. (This issue is not to be confused with critical trade sampling in CPP, before the enrollment window closes.)
- Too many students are completing trades in under 30, 60, 90 and 120 days. The WPO and other managers have been provided with NOJC-DOL data integrity training modules along with the TAR Audit Sheet, Data Error Correction Form, and Leave Request Form. Any TAR completed in less than 120 days requires WPO, then CD approval. No TAR can be entered into CIS without first being reviewed and approved by the WPO or his designee.
- The necessity for assistant WPO's should be reviewed; there is certainly no need for more than one permanent, full-time assistant.
- There is no evidence of active collaboration across the training departments to ensure that managers *manage the flow* of students – from CPP into a first or second choice trade, between TAR completion and academic advancement. As pointed out both by the PM and National Director Larry Dawson, vocations are part of a center spectrum and do not exist to simply generate completion credits.

By February 1, 2008, it is expected that the WPO will review TAR's regularly, at least monthly, and that these reviews be documented by the WPO and be available for

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inspection. Additionally, all vocational instructors must understand this expectation and comply with standard TAR protocols and TAR review – be they federal, NTC or contract instructors. Again, accountability is a key and daily task within CIS for all staff charged with tracking students' whereabouts.

Counseling and Assessment
The pre-on-site review included a review of at-risk students who were subsequently terminated. The on-site review found zero hard-copy records of any interventions with these same students.

1. Counseling needs to develop and follow a case-load schedule and meet with every student at least once per month. Students with few issues will receive fewer contacts and thus less documentation in hard copy files and CIS.
2. The counseling area needs to be deep-cleaned and then kept tidy.
3. Counseling needs to manage a newly-revised ESP process which, after January 1, 2008, should be held every 30 days.
4. ESP requires full-panel on-time submission of scores, and full-panel attendance by key departments. This process needs to be recorded and visible, moreover, within CIS.
5. It is recommended that the color card system and ESP be combined; that the PCDP be upgraded in real time during the 30 day assessment.
6. Counseling, both personal and career, like assessment, is not a secondary function in Job Corps. Counseling must re-assert itself as a key player in shaping and re-directing student behaviors. *Students need to adjust to and conform to CCC Job Corps culture.*
7. Initial intake assessments were not found in the folders reviewed; no documentation of one-to-one counseling was found in the folders reviewed; and the folders for separated students were not stored in a secure, professional manner. Intake assessments should drive, in part, the individualized plan for each student in CPP and beyond.

Review boards, likewise, need to be more organized. The board members need to review and be apprised of the pertinent incidents, then meet with the student in question. The facts of the case need to be outlined; the student, with or without a representative, needs to understand the pertinent issues that led to the board, needs to be given an opportunity to speak, and then the board needs to make a recommendation.

Residential
An excellent dorm meeting was observed in the new male dormitory at 4 pm. Domestic issues and scores were reviewed; good interaction between students and staff made for a lively and humorous meeting.

While the WPO has developed an electronic database for work orders, a back-log persists. Schenck has both hard trades and maintenance staff, and yet critical quality-of-life issues (broken lockers, broken doors, graffiti) remain. Not every repair requires a

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work order. At the same time, students, maintenance staff and hard trades are responsible for a rapid response to repairs, especially in the residential area.

Conclusion

The new and permanent center director is faced with the challenge of unifying a once-productive team. All staff members, in turn, must set high standards for student employees by insisting on, and modeling, professional demeanor, behavior and appearance. A lengthy and productive meeting between National Office Director, Program Manager, vocational instructors and other key staff, underlined the desire for positive change among staff at all levels, even between staff who have not recently been cooperating with one another. One staff member commented: "We meet with students and go over expectations. Why can't we meet with full staff and go over expectations?" Interpersonal conflict continues to impede staff performance, which in turn has a direct and negative impact on student outcomes and students' lives.

The student employees are an impressive cadre of young people who are highly trainable. The current staff, moreover, has the knowledge, skills, and abilities to turn Scheck around, perhaps quickly. As evidenced in residential, vocational, maintenance, counseling, and academic areas, however, an attention to detail and to quality at every level, must be restored; assessment, counseling, SST and character-building must drive center culture and not be seen as 'add-ons' or mere programs.

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TRAINING AND ACHIEVEMENT (TAR) AUDIT SHEET

DATE:	STUDENT NAME:	STUDENT ID#

Instructor	Manager	
		Start & stop and/or completion date on front of tar? Matches cis?
		Level and corresponding o*net code annotated on front of tar? Matches cis?
		All line items are completed and initialed by instructor and student?
		Completion not the same date as student sep (should be the last day in trade)? Matches cis?
		Line item completion dates not completed during any movements/non training days/center holidays?
		All performance ratings are 2 or above unless the training is not complete and the tar is a trainee (jt) level?
		Pre 120 day completion supported by strong documentation of skill attainment and center director approval? (documentation attached)

TAR HAS BEEN AUDITED AND IS COMPLETE AND ACCURATE

DATE:	SIGNATURE OF INSTRUCTOR
DATE:	SIGNATURE OF CT SUPERVISOR/MANAGER (WPO)
DATE:	SIGNATURE OF CENTER DIRECTOR (Less than 120 days completion)

RETURN FOR CORRECTION DATE:	RESUBMISSION DATE:

COMMENTS:

RECEIVED BY RECORDS:	DATE:	AUDITED BY:
ENTERED IN CIS:	DATE:	INITIALS OF STAFF ENTERING CORRECTION:

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TO BE REVIEWED AND UPDATED BY SEPTEMBER 1, 2007

ATTACHMENT F
Schenck Civilian Conservation Center

Standard Operating Procedure (SOP)

SOP: 06.1

Title: <u>Student Accountability</u>

Primary Responsibility: **Residential Living Staff**
                                        Principal Teacher and Academic Instructors
                                        Work Programs Administrator and Vocational Instructors

Reference(s) PRH 6.3 (Student Attendance, Leaves, and Absences)

Related SOPs:

Date of Issue: September 23, 2002 (revised)

NOTE: This procedure supercedes any previous instruction or procedure regarding same subject and will remain in effect until further notice.

I.   PURPOSE: To establish uniform systems that account for and document the participation and achievement of program participants.

II.   POLICY AND PROCEDURE
The shift supervisor will complete an accountability summary with input from the Dorm Managers, post in the Center log and inform the night shift supervisor of the summary (Student Status) at the change of the shift (midnight).

Night supervisor will be responsible to make bedchecks between 12 midnight and 3:00 a.m. and keep a chronological file in the Residential Department (Duty Office). Bedchecks will include names of students who are missing. Night supervisor will require each students to sign a serialized register between 6:00 a.m. - 9:00 a.m. on weekends and holidays.

The roster will be kept by dorms. A copy will remain in the Dorm file (Duty Office). The weekend accountability sheets (serialized register) will be forwarded to Student Records each Monday morning.

The morning report will be published and distributed by 10:00 a.m. every weekday.

Class attendance logs are taken for each class and filed chronologically in the Education departmental files. Class attendance records indicate the students who were tardy.

The department supervisor is responsible for locating the whereabouts of tardy students. Incident report will be filed in the Center Discipline System as necessary. Continued AWOL will be reported to other department supervisors.

Class attendance logs are taken at the beginning of each work day by the Vocation Instructor and again immediately following lunch period, and filed chronologically in the Work Programs Administrator office.

Student accountability in the dorms will begin immediately after the training day is completed.

Students will sign a serialized register upon enrollment. Students will sign a serialized register when departing and upon returning to Center from any off-Center status.

The Center Log book will be kept in Reception during the training hours and the Duty Office after hours and on weekends. The Dorm Logs and Center Log Book should be at Reception by 8:00 a.m. each weekday.

DELEGATION OF ACTING

The following form should be completed by all department heads during any absence they may have from the center. This form should be distributed to all department heads, the receptionist, and a copy should be placed in the employees personnel folder.

Approved:_____ / September 23, 2002
Center Director   Date of issue

DESIGNATION OF ACTING

To:_____

Date:_____

From:_____

Subject: Delegation of Authority

You are hereby designated Acting
_____
during my absence on
through_____.

This designation carries all of the delegable authorities of my position except:
_____

_____

–

_____

–

I can be reached as follows:

DATE: PLACE:

_____

_____

_____

_____

SHIFT CHANGE: CONTINUITY

A Job Corps Center is a 24 hour program with each area providing equally important training and support. Here, as in industry, it is important that shift changes do not complicate our mission. In order to assure the changes are as smooth as possible, the following policy and guidelines are in effect:

1. Staff will not end a shift without using an acceptable method of communicating to the next shift carry-over items and potentially dangerous situations.

2. Residential staff will Brief-in as follows:
    Dorm Staff (2nd) - 3:30 p.m
    Security shift (3rd) - 11:30 p.m.

3. Residential will assume responsibility after 3:30 p.m. on week days for transportation and other administrative details including picking up students.
    This responsibility will continue to 8:00 a.m. each training day.

4. All evening "carry-over" details must be communicated to the Residential Supervisor or Shift Supervisor directly at or prior to the daily Brief-In.

5. Should "carry-over" detail to weekends, Holidays or evenings require additional resources, request(s) should be made to the Center Director or

Acting Center Director for those resources.

AWOL CONTACT PROCEDURES AND FORM

In order that we might serve our students, parents, and staff, the AWOL Counselor is recommending that the following procedure on AWOL notification and contacting be adhered to by all Center staff:

6.   When a student is absent from as assigned area, within the close of a working day, the staff on duty should fill out the proper documentation and report to the department head. Under no circumstances should a staff end a shift unless all absences are accounted for or information is passed on.

7.   If a student is absent more than 24 hours, the staff on duty should notify this student's parents in regard to his/her present AWOL status. The date, time, and reason should be given. Notification to Law Enforcement is case of minors.

8.   All contacts by the staff should be placed on the notification form.

9.   The staff should check with the AWOL Counselor within three days for follow-up on AWOL students.

10. A copy of all notifications and contacts should be put into the student's discipline and counseling folders.

The following form should be completed by staff:

AWOL FORM

Student Name:_____ Date:_____

<u>AREA OF AWOL: (Please check one)</u>

      11.   Education:_____

      12.   Vocation:_____

      13.   Residential:_____

<u>CIRCUMSTANCES SURROUNDING AWOL:</u>

_____

_____

_____

_____

_____

_____

                         Staff Signature:

_____

Follow Up:

Parents have been contacted: _____Yes   _____No

Date:_____;   Time:_____
                                 Staff Signature:

_____

cc: **Counseling Folder**
        Discipline Folder
        AWOL Counselor

ATTACHMENT G

Leave Verification Form		
Student's Name	**Student ID#**	**Date**

Age: ____ Gender: M / F   Dorm: _____ Counselor:_____

Minor's: Was Parent or Legal Guardian's permission given: Y / N

Home of Record: _____ State _____ Zip Code_____

Name of Parent or Legal Guardian_____

Phone #: _____

REASON FOR LEAVE REQUEST

Reason for Leave (Medical/Legal Appointment /Funeral/Pending FFB/Military/ WBL /PDOF/Child Care/Family Issues, etc.):

_____

_____

_____

VERIFICATION OF LEAVE

Contact Person: _____ Telephone #_____

Contact Address:_____ State:_____ Zip Code:_____

Name of individual providing verification:_____

Date of verification: _____

Comments:

_____

_____

_____

APPROVAL PROCESS

Signature of staff who verified leave: **Date:**

Signature of Supervisor/Manager: **Date:**

1. Form to be attached to all requests for leave.
2. The above information will be entered into CIS case notes and a copy of the case notes attached to this form.

September, 2006

ATTACHMENT H

TRAINING AND ACHIEVEMENT (TAR) AUDIT SHEET

DATE:		STUDENT NAME:		STUDENT ID#

	Instructor	Manager		
START & STOP AND/OR COMPLETION DATE ON FRONT OF TAR?				Matches CIS?
LEVEL AND CORRESPONDING O*NET CODE ANNOTATED ON FRONT OF TAR?				Matches CIS?
ALL LINE ITEMS ARE COMPLETED AND INITIALED BY INSTRUCTOR AND STUDENT?				
COMPLETION NOT THE SAME DATE AS STUDENT SEP (SHOULD BE THE LAST DAY IN TRADE)? Matches CIS?				
LINE ITEM COMPLETION DATES NOT COMPLETED DURING ANY MOVEMENTS/NON TRAINING DAYS/CENTER HOLIDAYS?				
ALL PERFORMANCE RATINGS ARE 2 OR ABOVE UNLESS THE TRAINING IS NOT COMPLETE AND THE TAR IS A TRAINEE (JT) LEVEL?				
PRE 120 DAY COMPLETION SUPPORTED BY STRONG DOCUMENTATION OF SKILL ATTAINMENT AND CENTER DIRECTOR APPROVAL? (DOCUMENTATION ATTACHED)				

TAR HAS BEEN AUDITED AND IS COMPLETE AND ACCURATE

DATE:	SIGNATURE OF INSTRUCTOR
DATE:	SIGNATURE OF CATE SUPERVISOR/MANAGER
DATE:	SIGNATURE OF CENTER DIRECTOR (Less than 120 days completion)
RETURN FOR CORRECTION DATE:	RESUBMISSION DATE:

COMMENTS: _____

RECEIVED BY RECORDS:	DATE:	AUDITED BY:
ENTERED IN CIS:	DATE:	INITIALS OF STAFF ENTERING CORRECTION:

ATTACHMENT I

Use this form to correct errors in the following CIS data:

- Enrollment Information
- Birth Information
- HSD/G
- Separation Date
- Reason for Separation
- GED
- TABE Score deletion
- Separation Status Error
- Vocational Completion
- Training and Achievement Record (TAR)
- Vocational Completion
- Retroactive changes to student leave and pay status

Student Name:	**Student ID#**	**Date:**

REASON DATA TO BE CORRECTED

Reason for Data Integrity Correction:
Data To Be Corrected From
Data To Be Corrected To

Signature of staff requesting correction:	**Date:**
Supervisory/Managerial Review:	**Date:**

Approval Signature of Center Director or Designee:	**Date:**

Signature of Records Specialist:	**Date of Receipt:**
Correction made by:	**Date of Correction/TAC Number:**