

AUDITEES RESPONSE

U.S. Department of Labor

Office of Job Corps
Washington, D.C. 20210



JAN 22 2008

MEMORANDUM FOR:

ELLIOT P. LEWIS
Assistant Inspector General
Office of Audit

FROM:

ESTHER R. JOHNSON, Ed.D.
Administrator

SUBJECT:

Response to Performance Audit of the
Tulsa Job Corps Center
Report No. 26-08-001-01-370

The Office of Inspector General's (OIG) performance audit of the Tulsa Job Corps Center resulted in 3 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.

OIG Recommendation 1

We recommend that the National Director, Office of Job Corps, require the Dallas Regional Job Corps Administrator to:

- **Direct the Center Director to establish procedures that require the Tulsa Job Corps Center's compliance with both the PRH and its own local requirement for maintaining supporting documentation showing that parental or legal guardian signatures on parental consent forms were valid at the time of enrollment for all minors, including enrollees from the Thunderbird Youth Academy.**
- **Periodically verify that parental consent for students enrolled as minors was appropriately obtained and documented in student files**

OJC Response

Attached for documentation is the parental consent form used by the Tulsa Job Corps Center staff that documents parental or legal guardian consent. This form was put into place Fall 2006. The Dallas Regional Director (Administrator) will provide monitoring and oversight of the use of this document through monitoring trips and center assessments.

OIG Recommendation 2

We recommend that the National Director, Office of Job Corps, require the Dallas Regional Job Corps Administrator to verify the Tulsa Job Corps Center's compliance with the PRH requirements governing the EEO program. Specifically the Center Director, should:

- **Provide the EEO Officer with sufficient training on the program**
- **Establish a formal EEO training program for students and require that training be provided to all students**
- **Periodically monitor student awareness of the program**
- **Adequately publicize the program by placing posters including the name and telephone number of the EEO Officer throughout the center**
- **List the EEO program and the name and telephone number of the EEO Officer in the center's telephone directly as a reference for all students**

OJC Response

The Dallas Regional Director has confirmed through a center assessment, June 4-8, 2007, that the Tulsa Job Corps Center has implemented an EEO presentation for new enrollees to be delivered during the first week on center. At the completion of the training, students sign the PRH EEO acknowledgement form (Exhibit 6-11) attached. Additionally, the center formed an EEO committee consisting of 2 students and 3 center staff. To publicize the members of this committee, pictures of the students and staff representatives were placed around the center. Corporate on-line training was provided to the EEO committee on April 17, 2007. The EEO Officer retrained all students who were enrolled at the time of the audit and obtained student signatures on the PRH EEO form Exhibit 6-11.

OIG Recommendation 3

We recommend that the National Director, Office of Job Corps, require the Dallas Regional Job Corps Administrator to determine the integrity of Tulsa's reported On-Board Strength by monitoring the Center Morning Report and by periodically visiting the Center to confirm reported data related to On-Board Strength

OJC Response

The Regional Director of Dallas has been instructed to closely monitor On-Board Strength through desktop monitoring, onsite monitoring visits and center assessments.

ATTACHMENT A

PARENTAL CONSENT

Trainee's Name: _____ DOB: _____ SSN: _____
Last First MI

Parent/Guardian: _____

Address: _____ City: _____ ST: _____

Home #:() _____ Wk #:() _____ Cell # () _____

Emergency # 1:() _____ 2: () _____

Trainees enrolled have to have a Physical by the Medical Department and Females will be given a Pap smear and Breast exam. In case of an emergency the Medical Staff Needs consent for possible off-center & on-center treatment for medical and/or mental emergencies.

Job Corps policy requires that written permission be obtained from parent or guardian of any trainee under the age of 18 to participate in the Job Corps/Thunderbird partnership program. Please complete this form and initial the appropriate authorizations below. **WE MUST HAVE THIS FORM ON FILE.** Thank you for your assistance. Please call me at 918-591-5666 if you have any questions.

Linda Little CDSS Manager, Tulsa Job Corps Data Center

Thunderbird Represent

****THE SIGNATURE OF THE PARENT OR LEGAL GUARDIAN MUST BE NOTARIZED****

Signed: _____ Date: _____
Parent/Legal Guardian

Signed: _____ Date: _____
Notary Public

In and for _____ County, State of _____

My Commission Expires: _____

Note: After the trainee reaches the age of 18, this form will not apply. The trainee must observe the zero tolerance for violence, no smoking, alcohol and other drug policy at all times during enrollment in the program.

EQUAL OPPORTUNITY IS THE LAW

It is against the law for this recipient of federal financial assistance to discriminate on the following bases:

- Against any individual in the United States, on the basis of race, color, religion, sex, national origin, age, disability, political affiliation or belief, and;
- Against any beneficiary of programs financially assisted under Title I of the Workforce Investment Act (WIA) of 1998, on the basis of the beneficiary's citizenship/status as a lawfully admitted immigrant authorized to work in the United States, or his or her participation in any WIA Title I - financially assisted program or activity.

The recipient must not discriminate in any of the following areas:

- Deciding who will be admitted, or have access, to any WIA Title I – financially assisted program or activity;
- Providing opportunities in, or treating any person with regard to, such a program or activity; or,
- Making employment decisions in the administration of, or in connection with, such a program or activity.

WHAT TO DO IF YOU BELIEVE YOU HAVE EXPERIENCED DISCRIMINATION

If you think you have been subjected to discrimination under a WIA Title I – financially assisted program or activity, you may file a complaint within 180 days from the date of the alleged violation with either:

- *[Insert name, phone number, e-mail address, and mailing address for center's Equal Opportunity Officer]*, the recipient's Equal Opportunity Officer, or;
- The Director, Civil Rights Center (CRC), U.S. Department of Labor, 200 Constitution Avenue, NW, Room N-4123, Washington, DC 20210.

If you file your complaint with the recipient, you must wait either until the recipient issues a written Notice of Final Action, or until 90 days have passed (whichever is sooner), before filing with the CRC (see address above).

If the recipient does not give you a written Notice of Final Action within 90 days of the day on which you filed your complaint, you do not have to wait for the recipient to issue that Notice before filing a complaint with CRC. However, you must file your CRC complaint within 30 days of the 90-day deadline (in other words, within 120 days after the day on which you filed your complaint with the recipient).

If the recipient does give you a written Notice of Final Action on your complaint, but you are dissatisfied with the decision or resolution, you may file a complaint with the CRC. You must file your CRC complaint within 30 days of the date on which you received the Notice of Final Action.

Student Signature

Date

Please place a copy of the signed form in student's file.

October 5, 2005