



APPENDIX B

ETA's RESPONSE

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| U.S. Department of Labor | Employment and Training Administration 200 Constitution Avenue, N.W. Washington, D.C. 20210 |  |
| MAR 29 2017 | | |
| MEMORANDUM FOR: | ELLIOT P. LEWIS Assistant Inspector General for Audit | |
| FROM: | BYRON ZUIDEMA  Deputy Assistant Secretary for Employment and Training | |
| SUBJECT: | Response to the Office of Inspector General (OIG) Draft Report No. 26-17-001-03-370, <i>Review of Job Corps Center Safety and Security</i> | |

Thank you for the opportunity to review this follow-on report on Job Corps safety and security and to provide a response to its recommendations. The safety and security of Job Corps' students and employees has been and remains one of the Employment and Training Administration's (ETA's) top priorities.

In spite of our concerns with some of the underlying premises of the report with which we disagree — such as the contention that “students are not held legally accountable” — we appreciate the ongoing feedback from your office and demonstrate below how we have made substantial changes to the program as a result of your important work.

Job Corps has made major improvements in safety and security in response to recommendations in the OIG's February 27, 2015 report.¹ We largely agreed with the February 2015 OIG report's findings. As a result, ETA and Job Corps leadership and staff have taken significant steps to strengthen the safety and security of Job Corps system-wide. Many of these steps were taken between late 2015 and January 2017 and prior to the draft issuance of the second review,² and were the subject of several Job Corps briefings for the OIG. They include:

- A revised Zero Tolerance Student Conduct policy to support a safe, secure learning environment;
- Center Culture and Safety Assessments that resulted in numerous contractual actions affecting center operators;
- A new Job Corps division dedicated to reviewing and coordinating regional operations and activities;
- A new safety and security hotline;
- A new student-based safety and security awareness program;
- Training for all regional staff on the new Student Conduct Policy and approaches for effective monitoring and oversight; and
- A new national criminal background check process.

¹ OIG Report No. 26-15-001-03-370
² OIG Report No. 26-17-001-03-370

Job Corps has made major improvements in safety and security measures. Because of the intersecting timing of the first report issued in February 2015 and the follow-up field work, ending December 2015,³ much of what was pointed out or recommended in the follow-up draft report has been overtaken by Job Corps' actions. Unfortunately, the timing of the follow-up report (field work ending in December 2015) did not permit the OIG to acknowledge the many steps taken by Job Corps to improve the safety and security situation for its students and staff in the past 15 months. We will discuss many of the safety and health improvements we have undertaken in our responses to the specific OIG recommendations. Significantly, we have already implemented most of the recommendations presented in this follow-up report.

Additionally, the report may well leave a reader with the incorrect impression that the Job Corps safety and security situation is significantly worse than at high schools, community colleges, technical schools, and other organizations and institutions that also serve the same population as Job Corps. For example, a review of the Bureau of Justice Statistics and National Center for Education Statistics Annual Reports would have shown that serious incidents at Job Corps Centers are consistent with what occurs at schools across the country. To be clear, we do not tolerate unsafe conditions for our students in any form; however, we believe that the safety and security issues that arise at Job Corps are no different and on par with the issues that educators face in serving today's young people at comparable institutions.

Our responses to the individual OIG recommendations in the report follow.

Recommendation 1: Ensure Job Corps' centers report potentially serious criminal misconduct to law enforcement.

Response: Job Corps has implemented this recommendation. Job Corps requires all centers to report serious criminal misconduct to law enforcement. In August 2016, Job Corps issued Program Instruction Notice (PIN) 16-09 to remind centers of the requirement to contact law enforcement when they "suspect criminal behavior, or when serious incidents occur." The PIN further directs centers to "contact local law enforcement for all emergency situations involving potential criminal activity, and the threat to the safety and security of Job Corps students and staff."

We disagree with the OIG's characterization of the PIN as inconsistent with federal regulations. It appears the OIG audit team may not appreciate the complex legal relationship between Job Corps' regulations, guidance, and handbooks, which under basic principles of administrative law are not inconsistent with regulations if they interpret or address particular points and responsibilities described in the regulations. As the OIG's report notes, Section 5.4, R2, of the Policy and Requirements Handbook (PRH) expands on the regulatory requirement in sec. 686.925(b) to require agreements with the law enforcement agency responsible for overseeing the response to illegal activity on the center and conditions under which center operators are to call law enforcement. The August 2016 PIN reminded centers that they should call 911 or other appropriate law enforcement agencies in emergency situations. Job Corps has repeatedly and consistently communicated to center operators that all staff should be allowed to call 911 in

³ Most of the information upon which the OIG follow-on review report is based is field work whose scope covered January 1, 2014 through June 30, 2015.

emergency situations.

Recommendation 2: Ensure significant incidents are reported to Job Corps and correctly classified.

Response: Job Corps has implemented this recommendation. Job Corps requires significant incidents to be reported to the program and correctly classified. Its new Zero Tolerance Student Conduct Policy was issued on June 1, 2016, and became effective on July 1, 2016. It addresses the OIG's concerns about reporting and classification of significant incidents. This change revised PRH Exhibit 3-1 Infraction Levels, Definitions, and Appropriate Center Actions to clearly define behavior infractions, prescribe center actions, and specify reporting requirements for significant incidents. Each infraction is assigned as a Level I - Zero Tolerance Infraction (requiring immediate dismissal); a Level II Infraction; or a Minor Infraction, depending on the severity of the infraction. All Level I Infractions and many Level II Infractions require a Significant Incident Report (SIR).

Prior to the effective date of the new Zero Tolerance Student Conduct Policy, the Office of Job Corps conducted training for all components of the Job Corps system to ensure uniform understanding and enforcement of student conduct policies system wide. This effort included three in-person sessions for regional federal employees; web-based training for operators and contract staff; and specific training highlighting the changes in software applications necessitated by the change in the policy.

In addition, Job Corps' national and regional leadership monitors SIRs filed by centers in the program's ordinary course of business. Leadership often reaches out to gather more information to ensure Job Corps policy is consistently and appropriately applied. In March 2016, the OIG asked Job Corps to provide to it, on an ongoing basis, SIRs for seven categories of significant incidents. To date, the OIG has received reports on about 100 incidents. Job Corps has asked for feedback during quarterly meetings with the OIG leadership team, and it has received no concerns from the OIG about how Job Corps classifies incidents. Additionally, in the original findings discussed with ETA in December 2016, the OIG's analysis showed that centers correctly classified about 97 percent of the almost 1,000 incidents reviewed.

Recommendation 3: Define when law enforcement is to be contacted and the center staff authorized to contact law enforcement.

Response: Job Corps has implemented this recommendation. As fully described in response to Recommendation 1, Job Corps has established policy that specifically defines when law enforcement is to be contacted and addresses center staff authorized to contact law enforcement. ETA does not agree that a more prescriptive, one-size-fits-all policy would be feasible or practicable, and it raised this in meetings with the OIG audit team. While the report states that "Job Corps centers need to contact law enforcement to investigate serious incidents," this recommendation is impractical, misconstrues Job Corps Centers' relationship with law enforcement, and overstates its ability to assure investigations from those entities. Centers need to be able enter into an agreement with law enforcement and negotiate mutually agreeable provisions. Job Corps cannot dictate to local law enforcement agencies when it is appropriate to be contacted by a center, what types of incidents they will respond to or investigate, and what types of items they will remove from centers.

Job Corps has operated 126 centers in 126 different communities, and the kinds of incidents—serious and otherwise—to which Law Enforcement Officials (LEOs) will respond differ from community to community. In one major city, for example, police will not respond to calls from the center unless there is a life-threatening emergency. Many LEOs will not retrieve illegal drugs and controlled substances less than a felony amount in weight. Some LEOs will not come to a center to investigate an assault unless the victim wants to press charges. As of today, 94 percent of Job Corps Centers do have current agreements with local law enforcement, and efforts continue to obtain agreements for four percent of the centers. The remaining two percent of centers have LEOs that are unwilling to sign agreements. Some LEOs stated that they will provide similar services to Job Corps that they will provide for private citizens and organizations. When agreements are less detailed, it often is because LEOs do not want to be bound by parameters that may hinder their flexibility to respond as they deem appropriate.

It is also important to reiterate that Job Corps has repeatedly and consistently communicated to center operators that all staff should be allowed to call 911 in emergency situations.

Recommendation 4: Define center authority to investigate potentially serious criminal activity, including conducting searches, interviewing suspects and witnesses, performing surveillance, and collecting evidence.

Response: Job Corps has implemented this recommendation. The Job Corps' PRH defines center authority to investigate potentially serious criminal activity, including conducting searches, interviewing suspects and witnesses, performing surveillance, and collecting evidence. Job Corps has an unambiguous policy describing the limited situations where center staff may conduct searches, and when law enforcement must do so. PRH 5.4, R7, sets forth documentation and situational requirements before conducting searches for unauthorized goods on campus; flatly prohibits strip searches; and states that searches for evidence to support criminal prosecution "must always be done by a law enforcement officer with a search warrant, except when delay would endanger the physical well-being of students."

ETA also contends that we must distinguish between center enforcement of the Zero Tolerance Student Conduct Policy and investigation of alleged criminal activity for law enforcement purposes, which is the responsibility of law enforcement agencies. Job Corps' behavioral policy, like those of many schools and universities, prohibits conduct that also may violate criminal law in some or all states. Centers must investigate activities that violate the disciplinary code regardless of whether or not those activities also might violate applicable criminal law. Depending on the severity of incidents, this can include conducting investigations and holding Fact-Finding Boards within a few days of an alleged incident. These center investigations and Fact-Finding Boards — which may include searches, interviewing witnesses, reviewing videotape, and collecting evidence — are not criminal investigations, nor are they meant to replace, supplement, or duplicate the role of law enforcement in investigating alleged criminal misconduct. In other words, centers do not act as law enforcement agencies or as agents of the police.

Rather, under the Fifth Amendment of the Constitution, Job Corps is required to provide students appropriate due process prior to behavioral separation or imposition of any other sanction. To fulfill this obligation, centers conduct investigative activities and hold Fact-Finding Boards. A center's failure to investigate thoroughly a student's alleged violation of Job Corps' behavior

management system before conducting a Fact-Finding Board and separating a student would violate the student's constitutional right to due process. Center investigations and Fact-Finding Boards are thus an integral component of the Job Corps behavior management system rather than part of or intended to affect criminal investigation.

Job Corps has requested examples from the OIG audit team about where center actions taken in accordance with their responsibility to enforce the Zero Tolerance Student Conduct Policy negatively affected criminal investigations or prosecution of crimes; as of this writing, the OIG audit team has not provided such examples. We look forward to additional conversations about this subject.

Recommendation 5: Establish jurisdictional agreements that cover applicable Federal, State and local law enforcement for each center, including a determination of which LEO or combination of LEOs based on type of criminal activity that occurs.

Response: While more than 90 percent of Job Corps Centers have agreements with local law enforcement agencies, it is not within the authority of Job Corps to require local law enforcement agencies to establish such agreements. A few key enforcement agencies, such as the Metropolitan Police Department of the District of Columbia, are not willing to enter into such agreements.

The OIG follow-on review report suggests that Job Corps students' safety and security is jeopardized by a lack of detail in law enforcement agreements regarding jurisdiction. ETA disagrees with this premise, and the OIG did not identify incidents where this occurred in its report or during its review. Still, Job Corps students' safety and security is first and foremost to ETA, and the program requires centers to contact law enforcement in all emergency situations and in response to serious criminal activity—even in the absence of an agreement with local law enforcement or where the existing agreement does not contain the level of detail suggested by the OIG.

Where local law enforcement enters into an agreement to define its relationship with a center, these agreements necessarily vary in detail based on the specific circumstances of each center, local law enforcement agencies' priorities, and their willingness to include specific details in such agreements. These agreements primarily set out the circumstances in which local police will respond to an incident at the Job Corps Center; they also can memorialize Job Corps Centers' responsibility to contact the closest law enforcement organization to respond to emergencies and serious criminal activity. Where law enforcement does not wish to define its relationship with the center, the center still maintains a relationship with local law enforcement, albeit one that is not formalized, to ensure that agencies can respond on short notice to emergencies and serious criminal activity.

The OIG report suggests that "[t]he matter of jurisdiction is a cornerstone of criminal law as it relates to Job Corps." However, criminal law jurisdiction, as discussed in the report, is distinct from law enforcement's ability to respond to emergencies and investigate crimes on a Job Corps Center. As used in the report, the term "jurisdiction" refers to which entity has authority to prosecute a suspect accused of a crime on a Job Corps campus — not to the geographic area in which law enforcement will respond to crimes and emergencies.

Establishing jurisdiction for criminal law prosecution is complicated for Job Corps Centers, and such jurisdictional issues have only arisen a few times in recent years. While questions about the proper court with criminal law jurisdiction over incidents at Job Corps Centers can arise during prosecution of alleged criminal activity, those issues have no relation to Job Corps students' safety and security. Thus, because jurisdiction is relevant to the prosecution rather than investigation by law enforcement of an alleged crime, we disagree with the report's contention that not establishing the jurisdiction of each center could "impede or defeat criminal investigations."

The report also asserts that (a) a "lack of clarity regarding jurisdiction could lead to confusion and delayed LEO responses to potentially serious criminal activity," and (b) determining the criminal law jurisdiction at each center would "eliminate any potential confusion regarding which LEO to call and the level of involvement by each." Job Corps is not aware of any instance where a law enforcement organization has refused or delayed a response to a request for assistance from a Job Corps Center over jurisdictional concerns. Because Job Corps continues to explore ways to improve the safety and security of Job Corps' students and employees, we would appreciate receiving any specific examples that the OIG audit team has found of past situations where a "lack of clarity" about jurisdiction prevented a timely response to serious criminal activity or an emergency situation.

In addition, contrary to the report's suggestion that jurisdiction simply "depends on the nature and location of the misconduct," determining prosecutorial jurisdiction is a complex question under the constitutional and statutory provisions governing federal lands and their interactions with states. Its answer can depend on information such as how and when the federal government acquired the property (if it is owned by the government) and whether the state has ceded certain jurisdictional rights to the federal government as a consequence of its occupancy. How these rights are ceded varies by state; some states require state legislation, others delegate this authority to governors or allow the decision to be handled administratively. States may cede jurisdiction for parts of a property, but not others. Because many Job Corps Centers are located on second- or third-use federal properties, complete records of how the federal government first acquired the facility may not be in the possession of Job Corps or the Department of Labor. Thus, a definitive determination of jurisdiction would likely require significant research and resources—and still not be definitive because of disputed issues of law and fact that would require resolution by a court of competent jurisdiction. That resolution could only be obtained as part of a criminal prosecution.

Job Corps will require that all center operators submit annually to ETA Regional Offices and the Job Corps Division of Regional Operations and Program Integrity their written cooperative agreements with local law enforcement agencies – or an explanation about why such agreement could not be accomplished. Job Corps staff will review the agreements to determine whether they are complete, current, executed by appropriate officials, and contain minimum PRH requirements. While Job Corps cannot require law enforcement to include specific details in the agreements, it will provide assistance to those centers that do not have agreements in place or where agreements are lacking in detail.

Recommendation 6: Identify and address physical security challenges at centers.

Response: ETA agrees with the basic premise of this recommendation that physical security challenges at centers must be identified and addressed and is implementing this recommendation. In its Request for Proposal (RFP) to potential center contractors, Job Corps establishes its broad requirements for contractors to develop and implement procedures to ensure students feel safe and secure on center. Contractors must describe how they will tailor safety and security procedures to the unique features of the center, which are specified to include whether the center is an open campus with or without fencing, whether the campus is in a high crime area; a rural location, and so on. Offerors respond to the RFP, and Job Corps program experts on the technical evaluation panel determine whether the applicant's detailed solution for safety and security meet the requirements in the RFP. The contractor selected must perform according to the terms and conditions of the contract, which were originally identified in the RFP.

Job Corps holds contractors accountable, using a risk-management process that identifies key indicators and is designed to predict the emergence of student misconduct and safety issues at Job Corps Centers. This process considers many risk factors such as significant increases in reported serious student misconduct, and identifies leading indicators of potential security and safety issues at centers. The process helps Job Corps' staff to identify specific centers that are not providing a safe and secure environment for students and employees and focus attention and resources on those centers before more serious concerns surface.

Focused on continued improvement, Job Corps is proactively improving physical security as funding permits, including implementation of a \$12 million physical security pilot at 14 centers selected using criteria based upon comparative risk and areas of greatest need. The physical security system, put in place at each center, leverages existing technology to improve center safety; this includes physical access controls and video surveillance to detect and respond to incidents (video analytics, lockdowns, visitor management, panic messages, and partnerships with local police.) One center is complete, three are in progress, and 10 centers have completed initial surveys. Job Corps anticipates that all center work will be completed by September 30, 2017. Depending on funding levels, Job Corps will roll out the physical security system to 14 additional centers and then continue this phased approach until all centers have the new technology.

In addition to the physical security pilot, Job Corps also continues to conduct Job Corps Center Safety and Security Vulnerabilities Assessments of 12 centers. These centers were selected using criteria based upon the crime statistics in the designated center's commuting area, data captured from the Job Corps Security Needs Survey, and the incidents occurring on center. These assessments include, but are not limited to, the following security elements: (a) access control of buildings; (b) access control of campus; (c) campus-wide emergency notifications; (d) closed-circuit television; (e) campus lighting; (f) security operations; (g) campus signage; (h) grounds maintenance; and (i) other issues related to the overall security of the campus. As of this writing, all planned center assessments have been completed. Remediation of the findings from these assessments depends upon the availability of additional Construction, Rehabilitation and Acquisition (CRA) funding.

Recommendation 7: Implement methods to share best physical security practices systematically and in a timely way.

Response: Job Corps will continue to inform its center operators about best practices on physical security, including the many new physical security practices being instituted under the physical security pilot program discussed above. However, there are legal limitations on what information Job Corps may share. Some contractors' security techniques may be considered confidential proprietary information which may be protected from disclosure under applicable law, such as the Trade Secrets Act, 18 U.S.C. § 1905.

As a way to improve the sharing of best physical security practices with all center operators, Job Corps intends to hire a physical security specialist as part of its new Division of Regional Operations and Program Integrity. This will provide Job Corps with a source of physical security expertise to be provided to all Job Corps Centers.

Recommendation 8: Require Job Corps to proactively and continuously evaluate and improve its efforts to mitigate violence and other serious crimes at its centers.

Response: Job Corps has implemented this recommendation. Job Corps has established several integrated policies and practices across multiple divisions to proactively and continuously evaluate and improve its efforts to mitigate violence and other serious crimes at its centers. For example, Job Corps has developed a comprehensive, strategic, risk-based approach to identify centers with high levels of programmatic risk. In addition, it has undertaken several national initiatives to strengthen Job Corps safety posture and institutionalize a culture of mutual accountability. Looking forward, Job Corps established the Division of Regional Operations and Program Integrity to coordinate regional operations and activities by improving communications between the national and regional offices, strengthening quality assurance, and working to promote continuous improvement. The following summarizes Job Corps and the Division's efforts to date to improve center safety and security.

Job Corps has established a dedicated toll-free student safety hotline, 844-JC1-SAFE. This number is for calls of urgent nature or calls that relate to the safety and security of Job Corps students and staff. The hotline, employing telephone, text, and email/internet, is serviced by licensed professional staff skilled in the effective delivery of counseling, social work, behavioral health, psychology, conflict resolution and follow-up, as well as possessing an extensive knowledge of laws, law enforcement, and community-based services. Operational in the Chicago region, Job Corps anticipates expanding access to the entire Job Corps program in 2017.

Job Corps is implementing a new National Criminal Background Check process for applicants who request enrollment into the Job Corps program. The new process will obtain any existing criminal background information about an individual through a national search, as opposed to previous local searches. This will improve the scope, accuracy, and timeliness of information to fulfill the background eligibility requirement and provide a consistent and uniform process. National Criminal Background Checks started in the Atlanta region in the fall of 2016. They were rolled out in the Philadelphia region in February 2017, and will be rolled out to all regions by June 30, 2017.

Job Corps currently is developing and testing a comprehensive new student enrollment process to better provide that young people admitted to Job Corps not only meet the minimum program requirements, but that they can benefit from what Job Corps offers. The new admissions process includes two tools: (a) an updated tool for admissions staff to review any criminal background or court involvement, and (b) a tool to help assess readiness for Job Corps participation. The latter tool includes readiness indicators such as motivation and positive work attitude. Other enrollment process improvements include new quality assurance checks for all applications. Implementation of the comprehensive new student enrollment process is ongoing, with full, program-wide implementation by December 30, 2017.

Early in 2016, Job Corps introduced extensive changes to its behavior management policies in response to center assessments, recommendations from the OIG's February 2015 Student Conduct audit, and other events which raised concerns about center safety and operators' interpretation and adherence to Job Corps' behavior management requirements. Job Corps' revisions clearly define misconduct infraction categories. They provide specific definitions or examples for serious infractions and a crosswalk that identifies the previous infraction title and its corresponding new title, provides an explanation of any change, and a definition of the new infraction along with examples to provide a common understanding and proper classification by center personnel. The revisions also add a column to PRH Exhibit 3-1 to help centers determine whether the cited infraction requires that a SIR be entered into the SIR system. A Menu of Progressive Discipline Interventions and Sanctions was added to standardize these actions, set limitations, and provide progressive consequences for emerging patterns of minor infractions. Job Corps conducted training for center personnel prior to the effective date of the new policy, encouraging feedback from operators and experts for possible refinements.

Job Corps uses a risk-management based approach to schedule Regional Office Center Assessments, or ROCAs. Each center has two comprehensive assessments during the life of a contract, ideally during years two and five. However, Job Corps Regional Offices make adjustments to scheduling based on center performance and emerging problems at a Job Corps Center based upon information tracked through a Risk Management Dashboard (RMD) and other triggers.

Job Corps also employs targeted assessments focusing on specific program areas in response to Significant Incidents, whistleblower allegations, and other deficiencies identified during ongoing monitoring at the regional and national levels. Targeted assessments also verify the status of a contractor's corrective actions taken in response to violations communicated through formal correspondence, such as a Letter of Concern, or Cure Notice. These targeted assessments typically are unannounced. Examples of triggers that could initiate an adjusted full or targeted assessment (outlined in PRH Change Notice 15-08) include:

- Unfavorable results of performance, operational, or financial audits;
- Constituent issues (including email, telephone calls, and hotline reports);
- Whistleblower allegations;
- Unsatisfactory center progress in response to a PIP;
- Element of performance that is significantly below par;
- Failure to address initially cited ROCA weaknesses;
- Need to verify contractor's progress on Corrective Action Plan;

- Significant Incident Reports (either a very serious single incident or a negative trend);
- Sharp decline in Student Satisfaction Survey results;
- Significant facility issues; and
- Significant findings and concerns on operator annual assessments.

The implementation of targeted assessments – for example, the Center Culture and Safety Assessment (CCSA) – allow Job Corps to be more agile and responsive to data-driven, risk management tools that identify program weaknesses, inconsistencies, and non-compliance particularly in the area of center safety and security. The CCSAs are performed using a standardized, targeted assessment tool that focuses on 10 PRH sections; these sections comprise 18 requirements pertaining to the specific operational and compliance areas that have the highest impact on center safety, culture, and risk based upon in-depth analysis of critical breaches that occurred previously. From September 2015 to December 2016, 43 CCSAs were conducted, resulting in contractual actions including Letters of Notification, Letters of Concern, Cure Notices, and Show Cause Letters. (The CCSAs may be augmented by a Job Corps Center Safety and Security Vulnerabilities Assessment of the pilot centers mentioned previously.)

Job Corps also introduced a Corrective Action Tracker (CAT) to monitor issues uncovered during assessments that were serious enough to warrant contractual action and follow-up. Job Corps' Contracting Officer's Representatives (COR) in the Regional Offices use the CAT to document center corrective actions and their monitoring efforts to ensure that contract deficiencies are addressed. As part of its oversight function, the Division of Regional Operations and Program Integrity monitors completeness and accuracy of Regional Office documentation around "open issues," and it maintains a bird's eye view of compliance issues program wide. Through review of regional activities, the Division serves as a quality control function and provides real-time assistance and guidance so that program wide oversight activities are timely, consistent, and effective.

Job Corps also engaged students in violence mitigation efforts. At the 2015 National Job Corps Association (NJCA) Training Conference, about 90 Job Corps student ambassadors approached the National Director seeking to leverage the power of Job Corps students to reach other students within their communities for the purpose of addressing violence, aggression, and bullying. Job Corps developed a student-organized and student-led campaign called Youth 2 Youth: Partners 4 Peace (Y2Y) for Job Corps Centers across the nation. Y2Y Student Ambassadors' efforts culminated during Y2Y Week 2015, where the Job Corps National Director visited the Long Beach and Detroit Job Corps Centers to address the students, participate in some planned activities, and obtain student feedback on safety and security.

In 2016, Y2Y Student Ambassadors took their engagement into the communities where they live, learn, train, and work. Through events such as the Listening & Learning Session in Washington, D.C. with the National Director; community engagement pilot programs in Louisiana, Maine, and North Carolina; and webinars with student leaders, Job Corps' Ambassadors continued the conversation about ending youth violence. Y2Y Week 2016 marked the culmination of a year's worth of nonviolence efforts by 630-plus Y2Y Student Ambassadors at 100-plus Job Corps Centers across the nation. Throughout the week, the Y2Y Student Ambassadors encouraged more than 37,000 Job Corps students to take their message of peace into their communities by inspiring others to share stories of nonviolence, meet with law

enforcement, coordinate peace walks, and engage in other community events. More than 100 centers hosted peace walks on September 21, 2016, the International Day of Peace, to symbolize the unity and strength of their ongoing commitment to ending violence in the community. Job Corps has made Y2Y a permanent part of its ongoing efforts to promote safe centers. The results of Job Corps' dedicated focus on violence mitigation efforts and increased student involvement in center safety initiatives are reflected in improvement in Job Corps' Student Satisfaction Survey. The survey is conducted twice a year in March and September. The safety rating, as of September 2016 was 88.2, the highest level since March 2014.

Recommendation 9: Define the types and frequency of background checks needed for the different employment positions within centers and the criminal histories that would disqualify individuals from employment.

Response: ETA agrees that we must define the types and frequency of background checks needed for the different employment positions within Job Corps Centers, as well the criminal histories that would disqualify individuals from employment and is implementing this recommendation. Because background checks implicate several federal and state laws, including civil rights laws, Job Corps carefully and mindfully is developing a new, written background check policy for staff.

We appreciate the opportunity to review this OIG follow-on review report. ETA takes seriously its responsibility for the safety and security of Job Corps students and staff, and we remain committed to working with the OIG on ways to improve the program.