

U.S. Department of Labor

Office of Inspector General—Office of Audit

OFFICE OF JOB CORPS



COMPLAINT INVOLVING THE TULSA JOB CORPS CENTER

Date Issued: March 13, 2008
Report Number: 26-08-003-01-370

BRIEFLY...

Highlights of Report Number 26-08-003-01-370, *Complaint Involving the Tulsa Job Corps Center*, to the National Director, Office of Job Corps, dated March 13, 2008.

WHY READ THE REPORT

The report discusses the audit results from our assessment of a hotline complaint concerning improprieties at the Tulsa Job Corps Center, located in Tulsa, Oklahoma and operated by ResCare Corporation (ResCare). The hotline complaint listed 4 specific allegations, and our audit of the hotline complaint reported that 3 of the 4 allegations had merit.

WHY OIG CONDUCTED THE AUDIT

The complainant alleged that Tulsa officials did not properly conduct and complete student surveys, did not properly follow parental approval requirements when enrolling minors, did not establish and maintain an Equal Employment Opportunity (EEO) program for students, and did not properly account for separated students.

Our audit objective was to determine if the allegations had merit. Specifically, we answered the following questions:

1. Did Tulsa officials properly conduct and complete student surveys?
2. Did Tulsa officials properly follow parental approval requirements when enrolling minors?
3. Did Tulsa officials establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the Policy and Requirements Handbook (PRH)?
4. Were separated students improperly included in the Center's Morning Report and shown as part of the Center's On-Board Strength (OBS)?

READ THE FULL REPORT

To view the report, including the scope, methodology, and full agency response, go to: <http://www.oig.dol.gov/public/reports/oa/2008/26-08-003-01-370>

U.S. Department of Labor
Office of Inspector General
Office of Audit

WHAT OIG FOUND

We concluded that 3 of the 4 allegations had merit. Specifically, Center officials properly conducted and completed student surveys. However, Center officials did not properly follow parental approval requirements when enrolling minors. Six of the 7 minor students included in our review did not have proper parental consent, which could prevent Center staff from fully assessing the student and providing appropriate services, and could lead to the student not completing the program.

We also concluded that Center officials did not properly establish and maintain an EEO program for its students. Center officials did not publicize the program and most students we interviewed were not aware of the program. As a result, there was not sufficient assurance that the Center was adequately protecting students' civil rights.

Finally, we concluded that 2 of the 3 separated students mentioned in the complaint were improperly included in the Center's Morning Reports and shown as part of the OBS. Including students in OBS after the students should have been separated artificially distorts the Center's actual performance.

WHAT OIG RECOMMENDED

The OIG recommended the National Director, Office of Job Corps require the Center Director to: establish procedures to verify compliance with PRH and local requirements for obtaining and maintaining supporting documentation regarding parental consent for minor students; take action to provide training to the EEO Officer, establish a formal EEO training program for students, train all students, periodically monitor student awareness of the EEO program, and adequately publicize the EEO program to students; and verify the integrity of the Center's reported OBS by monitoring the Center's Morning Report and by periodically visiting the Center to confirm reported OBS.

HOW AUDITEE RESPONDED

The National Director, Office of Job Corps, concurred with all findings and the 3 recommendations made in the report.

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Executive Summary

The Office of Inspector General (OIG) received a hotline complaint concerning improprieties at the Tulsa Job Corps Center (Center), which is operated by ResCare Corporation (ResCare) and is located in Tulsa, Oklahoma. In response to this complaint, we initiated a limited review of four specific allegations. Specifically, the complaint alleged that ResCare did not properly conduct student surveys; did not follow parental approval requirements; did not establish and maintain an EEO program for its students; and did not follow guidance regarding student accountability.

Our objective was to determine if the allegations had merit. Specifically, we answered the following four questions:

1. Did Center officials properly conduct and complete student surveys?
2. Did Center officials properly follow parental approval requirements when enrolling minors?
3. Did Center officials establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the Policy Requirements Handbook (PRH)?
4. Were separated students improperly included in the Center's Morning Report and shown as part of the Center's On-Board Strength (OBS)?

To accomplish our objective, we assessed the Center's compliance with the PRH governing student surveys, parental consent for minors, EEO requirements, and student accountability.

Results

We concluded that 3 of the 4 allegations shown above had merit. Specifically, from our limited review, we found that:

1. Center officials did properly conduct and complete student surveys in accordance with the PRH. Therefore, this allegation did not have merit.
2. Center officials did not properly follow parental approval requirements when enrolling minors. Specifically, Center officials did not obtain or maintain all supporting documentation for 6 of 7 students as required by the PRH regarding parental approval when minor students were enrolled. Therefore, this allegation had merit.

3. Center officials did not establish and maintain an EEO program for its students as required by the PRH. Specifically, Center officials did not adequately publicize the EEO program as required by the PRH. Therefore, this allegation had merit.
4. Separated students were improperly included in the Center's Morning Report and those students were shown as part of the Center's OBS. Of the 3 students identified in the complaint, 2 were improperly included in Center's OBS beyond the dates that the students should have been terminated (in accordance with the PRH). Therefore, this allegation had merit.

Recommendations

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

1. Direct the Center Director to establish procedures that verify 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, and periodically verify that parental consent for students enrolled as minors was appropriately obtained and documented in student files.
2. Direct the Center Director to: 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 phone number of the EEO Officer throughout the Center; and list the EEO program and the name and phone number of the EEO Officer in the Center's telephone directory as a reference for all students.
3. Determine the integrity of Tulsa's reported On-Board Strength by monitoring the Center's Morning Report and by periodically visiting the Center to confirm reported data related to On-Board Strength.

Agency Response

The National Director, Office of Job Corps, concurred with the audit's findings and all 3 recommendations provided for improvement. The Agency's complete response to all 3 audit recommendations can be found in Appendix D. The Director stated the Dallas Regional Director (Administrator) would provide monitoring and oversight for using parental consent forms, had already confirmed the implementation of the EEO program and the training of all students at the Center, and would use desktop monitoring, onsite monitoring, and center assessments to oversee the Center's On-Board Strength.

OIG Conclusion

The OIG agrees that the corrective actions taken and planned by Job Corps management are appropriate for all 3 audit recommendations. Based on the actions taken, we consider recommendation 2 resolved and closed. Recommendations 1 and 3 are resolved and open. To close these recommendations, the Office of Job Corps needs to provide documentation showing their planned corrective actions have been completed.

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U.S. Department of Labor

Office of Inspector General
Washington, DC 20210



March 13, 2008

Assistant Inspector General's Report

Esther R. Johnson
National Director
Office of Job Corps
U. S. Department of Labor
200 Constitution Avenue, N.W.
Washington, DC 20210

In response to a hotline complaint, the Office of Inspector General (OIG) conducted a limited review of four specific allegations at the Tulsa Job Corps Center (Center), which is located in Tulsa, Oklahoma. The complaint alleged the Center's operator, ResCare Corporation (ResCare), did not:

1. Properly conduct student surveys,
2. Follow parental approval requirements,
3. Establish and maintain an EEO program for its students, and
4. Follow guidance regarding student accountability.

Our objective was to determine if the allegations had merit and our review was limited to Program Year (PY) 2005 and a portion of PY 2006 (July 1, 2005 through January 31, 2007). To accomplish our objective, we assessed the Center's compliance with the Policy and Requirements Handbook (PRH) governing student surveys, parental consent for minors, EEO requirements, and student accountability. Accordingly, we asked the following four questions:

1. Did Center officials properly conduct and complete student surveys?
2. Did Center officials properly follow parental approval requirements when enrolling minors?
3. Did Center officials establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the PRH?
4. Were separated students improperly included in the Center's Morning Report and shown as part of the Center's On-Board Strength?

The table below presents the allegations we considered and our conclusions whether each individual allegation had merit.

ALLEGATION	CONCLUSION
Student surveys were not conducted and completed in accordance with the PRH	Did not have Merit
The Center did not follow parental approval requirements when enrolling minors	Had Merit
The Center did not establish and maintain an EEO program for its students as required by the PRH	Had Merit
Separated students were improperly included in the Center's Morning Report and shown as part of its On-Board Strength	Had Merit

We conducted the audit in accordance with Government Auditing Standards for performance audits issued by the Comptroller General of the United States. We have provided a Background in Appendix A that further discusses the Center's and Job Corps' performance measures. Our audit objective, scope, methodology, and criteria are shown in Appendix B.

Objective 1 – Did Center officials properly conduct and complete student surveys?

Finding 1. Center officials did properly conduct and complete student surveys.

Based on our interviews with students at the Center, we concluded that Center officials did properly conduct and complete student surveys in accordance with the PRH. According to the PRH, the student survey is required to be administered quarterly to all students, including new arrivals, enrolled in Job Corps. The survey questions elicit students' perceptions on a broad range of services and center activities, and the questions focus on students' experiences during the last month. We separately interviewed 10 students that were previously assigned proctor duties¹ for the period September 2005 through December 2006. Each of the 10 student proctors stated that they were given instructions by the Career Standards Officer (CSO) on how to administer the surveys, but were not told what to put on the surveys. Moreover, each proctor stated that only students were present when surveys were administered. We concluded Proctors understood their roles and responsibilities regarding student surveys and concluded the allegation did not have merit.

¹Job Corps student surveys were administered by students that volunteered to accept proctor duties. Proctor duties included instructing other students about the purpose of the survey, overseeing the completion of the survey, collecting the results, and sealing the information that was then sent to the Job Corps Data Center.

Objective 2 – Did Center officials properly follow parental approval requirements when enrolling minors?

Finding 2. Center officials did not properly follow parental approval requirements when enrolling minors.

Center officials did not properly follow parental approval requirements when enrolling minors. Specifically, our review of documentation for seven students who were minors at the time of enrollment showed that Center officials did not obtain or maintain adequate proof of parental consent as required by Chapter 1 (Exhibit 1-1) of the PRH for six of the seven minor students. The PRH requires that applicants who are minors must have parental or legal guardian consent in order to enroll in a Job Corps center.

Of the four students mentioned in the allegation, two students were not minors, and therefore did not need consent. Regarding the other two students, both underage students did not have proper parental consent. For one student, Tulsa officials could not provide documentation of parental consent. For the other student, the parental consent form was not witnessed by a Center representative as required by the PRH. Therefore, the allegation had merit.

Based on the results of our initial review, we conducted tests of five additional minor students who enrolled in the Center from the Thunderbird Youth Academy during the period December 30, 2006, through January 31, 2007, and found similar results. The five additional students had signed consent forms. However, only one of the signed forms were either notarized or signed by a Center Representative. Thus there was not sufficient assurance the signatures were valid.

Enrollment of minors without parental consent could result in a lack of pertinent information regarding the student that could prevent Center staff from fully assessing the student and providing appropriate services, which could lead to the student not completing the program. In addition, the Center did not follow its own local form to ensure the accuracy of parental and guardian signatures. The Center established a requirement that parental or guardian signatures be notarized on a form developed by the Center. While we agree that this additional Center-developed control was helpful in assuring the validity of parental or guardian signatures, Center officials did not always execute this control.

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.

Agency Response

The National Director, Office of Job Corps provided a copy of the parental consent form used by the Tulsa Job Corps Center's staff that documents parental or legal guardian consent. The National Director stated that the parental consent form was put into place in the Fall of 2006. Lastly, the National Director stated that the Dallas Regional Director (Administrator) will provide monitoring and oversight of the use of this document through monitoring trips and center assessments.

OIG Conclusion

The OIG agrees that these planned corrective actions are appropriate and we consider audit recommendation 1 resolved and open. To close this recommendation, the Office of Job Corps needs to provide documentation showing their planned corrective actions have been completed.

Objective 3 – Did Center officials establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the PRH?

Finding 3. Center officials did not establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the PRH.

Center officials did not establish and maintain an EEO program for its students as required by the PRH. Specifically, Center officials did not adequately publicize the EEO program, ensure that students were knowledgeable about or received adequate training on the program, or ensure that students knew how to file a complaint or with whom to file the complaint. The PRH states that Job Corps centers must develop and implement systems to respond to complaints of discriminatory treatment of students. The PRH also includes a requirement that the Center provide training and publicity about the program. We found that the Center's actions regarding the EEO program were not adequate to ensure student awareness. Therefore, the allegation had merit.

We interviewed 11 students in order to determine their awareness of the program. These students initially enrolled at the Center during the period February 2006 through November 2006. Of the 11 students we interviewed, 10 students were not knowledgeable or aware of the EEO program. The one student who was knowledgeable about the EEO Program stated that he knew how to report an EEO complaint but did not know who at the Center would accept the complaint. The student incorrectly thought the Center Standards Officer (CSO) was the person with whom to file an EEO complaint.

We also found that EEO training for students was limited. According to the EEO Officer for the students, incoming students do not receive formal EEO orientation. Instead, the EEO Officer provides incoming students with a brief EEO discussion when they tour the recreational center. We also found that the EEO Officer did not keep a log or list of students that received the brief EEO discussion. In fact, the EEO Officer stated that she had not received any EEO training when she was appointed EEO Officer. The PRH requires that designated EEO Officers be well trained.

Further, we found that the EEO program was not adequately publicized. Through our observations at the Center, we could not find any posted EEO information anywhere at the Center regarding the EEO Officer or the EEO program. Further, the Center phone listing did not include the title, position, or name of the EEO Officer.

Without adequate information about and training on the EEO program, there was not sufficient assurance that the Center was adequately protecting students' civil rights and promoting an environment free from discrimination and sexual harassment.

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 phone number of the EEO Officer throughout the Center; and
 - List the EEO program and the name and phone number of the EEO Officer in the Center's telephone directory as a reference for all students.

Agency Response

The Dallas Regional Director confirmed through a center assessment, completed from June 4, 2007 through June 8, 2007, that the Tulsa Job Corps Center had implemented an EEO presentation for new enrollees to be delivered during the student's first week on center. At the completion of the training, students are suppose to sign the PRH EEO acknowledgement form (a copy of the form was included in Job Corps' response, see Appendix D). Additionally, the Center formed an EEO committee consisting of 2 students and 3 Center staff. To publicize the members of the EEO committee, pictures of the students and staff representatives were placed around the Center. In addition, on-line training was provided to the EEO committee on April 17, 2007. Lastly, the EEO

Officer retrained all students who were enrolled at the time of the audit and obtained student signatures on the PRH EEO form.

OIG Conclusion

The OIG agrees that the corrective actions taken are appropriate, and we consider audit recommendation 2 resolved and closed.

Objective 4 – Were separated students improperly included in the Center's Morning Report and shown as part of the Center's On-Board Strength?

Finding 4. Separated students were improperly included in the Center's Morning Report and shown as part of the Center's On-Board Strength.

Separated students were improperly included in the Center's Morning Report for up to 102 days after the student left the Center, and those students were also shown as part of the Center's On-Board Strength (OBS). Therefore, the allegation has merit.

We reviewed available documentation for the 3 students that were identified in the complaint and determined that 2 of the 3 students were improperly included in Center's OBS beyond the dates that the students should have been terminated. Below is the information on the two students:

- The first student was included in OBS for 29 days after the student should have been separated. The student was caught inhaling glue in class on March 9, 2006. The Instructor completed an incident report and turned the matter over to Center management. According to the Center's Standard Operating Procedure 552.1, (Disciplinary Separation, page 2, paragraph C 10), the student committed an offense that required a Center Review Board (CRB) within 48 hours of the offense. Center officials had until March 11, 2006, to convene the board. Center officials did not maintain any record of the CRB results. However, Center officials stated that the Board met on March 12, 2006, and recommended separation. However, the student was not separated until April 10, 2006, which was 29 days after the student should have been separated.
- The second student was included in OBS for 102 days after the student should have been separated. The PRH (Exhibit 6-1, Duty/Pay/Leave Status, page 4) states that a student who is absent without official leave (AWOL) for 12 days in a 6-month period shall be terminated. The student had 12 AWOL days between February 2, 2006 and March 5, 2006. However, the student was included in OBS until June 15, 2006, which was 102 days after the student should have been separated.

Including students in OBS after the students should have been separated artificially distorts the Center's actual performance. OBS is one of the measures used by Job Corps to monitor a center's performance. OBS measurement focuses on the center's

ability to operate at full student capacity. Centers operating at less than full-student capacity may be required to refund Job Corps a portion of reimbursable expenses.

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.

Agency Response

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

OIG Conclusion

The OIG agrees that these planned corrective actions are appropriate, and we consider audit recommendation 3 resolved and open. To close this recommendation, the Office of Job Corps needs to provide documentation showing their planned corrective actions have been completed.



Elliot P. Lewis

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Appendices

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APPENDIX A

BACKGROUND

Job Corps is a national residential training and employment program administered within the Department of Labor by the Office of Job Corps. The program addresses the multiple barriers to employment faced by at-risk youth throughout the United States. The Job Corps program is currently authorized by Title I, Subtitle C, of the Workforce Investment Act of 1998.

As a national, primarily residential training program, Job Corps' mission is to attract eligible young adults, teach them the skills they need to become employable and independent, and place them in meaningful jobs or further education.

Education, training, and support services are provided to students at Job Corps center campuses located throughout the United States and Puerto Rico. Job Corps centers are operated for the U.S. Department of Labor by private companies through competitive contracting processes, and by other Federal Agencies through an inter-agency agreement.

The WIA legislation authorizing Job Corps requires the Secretary of Labor to provide a level of review of contractors and service providers over a 3-year period. The CFR states all Job Corps centers must be reviewed over the 3-year period. The OIG has taken the lead in providing audit coverage of the operators and service providers for the Secretary.

The Tulsa Job Corps Center is located approximately five miles from downtown Tulsa, Oklahoma. The center is approximately 98 miles east of the State Capital, which is located in Oklahoma City, Oklahoma. The Tulsa Job Corps Center has on-board student strength of 300 students and an annual operating budget of approximately \$7 million.

In 1984, the current facility was purchased from Tulsa University. There are four buildings on 13 acres of land with ample recreation space. This includes a recreation center, multipurpose field, and a volleyball court.

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OBJECTIVES, SCOPE, METHODOLOGY, AND CRITERIA

Objectives

Our audit objectives were to determine the validity of the 4 allegations contained in the hotline complaint regarding the Tulsa Job Corps Center. Our specific objectives were to answer the following 4 questions:

1. Did Center officials properly conduct and complete student surveys?
2. Did Center officials properly follow parental approval requirements when enrolling minors?
3. Did Center officials establish and maintain an Equal Employment Opportunity (EEO) program for its students as required by the PRH?
4. Were separated students improperly included in the Center's Morning Report and shown as part of the Center's OBS?

Scope

Our audit comprised a limited review of the four allegations. We limited our audit coverage to those areas specifically addressed in the original complaint and restricted our testing to audit procedures necessary to fulfill the audit's objective. For the allegation involving parental approval requirements, four names were specifically addressed in the complaint but only two were minors. As a result, five additional names were added for review. Also, the complaint listed three separated students improperly included in the Center's Morning Report, and we limited our testing to only those three students.

We examined data covering the period July 1, 2005, through January 31, 2007. Field work was performed in February 2007 at Tulsa Job Corps Center.

To accomplish the audit, we reviewed the controls and PRH requirements associated with student surveys, obtaining parental consent when enrolling a minor, establishing an EEO Program for students, and reporting the Center's OBS. However, our work was limited to the original complaint; and as a result, we did not design any specific work necessary to render an opinion about the Center's internal controls and this report does not render any such opinion.

Methodology

To determine whether each allegation had or lacked merit, we gained an understanding of the controls, processes, and standard operating procedures (SOP) used to manage the Tulsa Center's operations. In addition, we interviewed key staff, interviewed

students, and reviewed student records. Specifically, we separately interviewed 10 students who administered Student Surveys to compare how they had fulfilled their proctor duties to those duties called for by the PRH; reviewed the PRH requirements and the local form governing parental consent, and examined student folders to validate the PRH and local requirement was followed; compared EEO practices at the Center to actions called for by the PRH; interviewed 11 students to find out how much they understood about the EEO program; and reviewed the attendance history and disciplinary actions for 3 students to determine whether they were shown as enrolled at the Center after they were no longer active participants at the Center.

The 10 students who administered the Student Surveys and 11 students who were interviewed about the EEO program were all selected judgmentally. We visited the Education and Vocation classes, and with the permission of Center management, selected one student per class visited to interview.

We conducted this performance audit in accordance with generally accepted government auditing standards for performance audits. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Criteria

We used the following criteria to perform this audit:

Job Corps Policy and Requirements Handbook

Tulsa Job Corps Center Standard Operating Procedure 552.1

APPENDIX C

ACRONYMS AND ABBREVIATIONS

AWOL	Absent Without Official Leave
Center	Tulsa Job Corps Center
CRB	Center Review Board
CSO	Career Standards Officer
EEO	Equal Employment Opportunity
OBS	On-Board Strength
OIG	Office of Inspector General
PRH	Policy and Requirements Handbook
PY	Program Year
ResCare	ResCare Corporation

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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

A handwritten signature in cursive script that reads "Esther R. Johnson".

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