

## **APPENDIX 505**

### **ADMINISTRATION AND MANAGEMENT OF JOB CORPS CONTRACTOR-HELD GOVERNMENT-FURNISHED PROPERTY**

#### **1. General Administration**

- a. Property funded, leased, or owned by U.S. Department of Labor (DOL)/Job Corps and furnished to Job Corps contractors is contractor-held government-furnished property. Government-furnished property (GFP) is administered by the Job Corps National Office, with assistance from the Job Corps Regional Offices, and is managed on location by Job Corps contractors. Appropriate stewardship of government property is a contractual requirement. A National Property Officer for Job Corps is assigned by the Job Corps Administrator to direct and manage the Job Corps GFP Administration Program in accordance with all applicable rules, regulations, and policies.
- b. Rules and regulations pertaining to administration of contractor-held GFP are included in the Code of Federal Regulations (CFR), Federal Management Regulations (FMR), the Federal Acquisition Regulation (FAR), and other regulations, including those established by the General Services Administration (GSA). Policies within the Job Corps GFP Administration Program align with those of its parent agency and with the Department of Labor with regard to contractor-held GFP.<sup>1</sup> DOL/Job Corps contractors are bound by contract to adhere to applicable regulations and policies for management and stewardship of government property.
- c. Rules and regulations pertaining to contractor-held GFP differ from government property in other categories. Property in other categories includes, for example, that which is assigned to federal offices, and property that is held by grantees. Job Corps currently administers the largest volume of contractor-held GFP within the Department of Labor.
- d. Job Corps' Electronic Property Management System (EPMS) and Fleet Tracking Management System (FTMS) are managed by the Job Corps Data Center (JCDC), and help to support the Job Corps GFP Property Administration Program. Because of the high volume of contractor-held inventory, volume of activity, and unique rules associated with contractor-held GFP, the GFP Administration Program (along with the Job Corps EPMS and FTMS) is managed separately from the property and fleet tracking systems established at the DOL level. However, the Job Corps EPMS and FTMS provide information for various reports to DOL and to other federal agencies as needed.
- e. The National Office of Job Corps is responsible for providing information to DOL for inclusion in accounting and reporting systems as required.

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<sup>1</sup> Variances resulting from Job Corps updates are noted.

- f. Where requirements or procedures are not included in this policy, Chapter 5, Management Services, and the ETA 359 Property Management Handbook (August 2003) will be consulted. With some variances as noted herein, Chapters VIII (Closeout Procedures) and IX (Motor Vehicles) of the ETA 359 shall be incorporated in whole into this policy, along with all example forms included in the ETA 359 appendices.
- g. Contractors are encouraged to review the use of Voluntary Consensus Standards for property management as established by the National Institute of Standards and Technology (NIST), and to make determinations for adopting such standards, as practicable, and wherever such determinations do not directly or indirectly conflict with this policy. (See GSA Bulletin FMR B-18 <https://www.gsa.gov/cdnstatic/bulletinb-18.doc> for additional information.)
- h. Job Corps has not implemented an exchange/sale program for personal property. Therefore, except as otherwise provided in this policy, the sale or exchange of GFP is expressly prohibited.

## 2. Categories of Contractor-Held GFP in Job Corps

- a. *Movable Durable Property (MDP)*: Training equipment, furniture, and vehicles are good examples of MDP in Job Corps. MDP includes property that historically has been referred to as “Personal Property.” **MDP is not:**
  - Real estate property (including buildings, lands, plumbing and fixed appliances like refrigerators, washing machines, etc.)
  - Expendable (such as food, paper supplies, and other items that generally are used up or are expected to be used up to meet their purpose, or lose their identity in contract performance)
- b. Unless otherwise stated, where the term “property” appears in this policy, it shall be construed as MDP that is furnished or funded by the government to contractors for dedicated contract use.
- c. *Sensitive and Non-Sensitive MDP*:

MDP is categorized in Job Corps as sensitive or non-sensitive. For Job Corps’ purposes, sensitive property is property that is at high risk for loss. All sensitive property in Job Corps must be reported into the EPMS. Non-sensitive property also must be reported if it meets or exceeds the dollar threshold for reporting established by Job Corps (see Section 9, Dollar Thresholds).
- d. *Fleet*:
  - (1) Fleet vehicles in Job Corps are mobile vehicles that are:

- Leased (usually from GSA)
  - Rented (for a special purpose; for instance, a bucket truck for a specific on-site use)
  - Owned (purchased outright by the government, or acquired by transfer or donation)
- (2) Fleet vehicles are considered MDP but are reported in the Job Corps Fleet Tracking Management System (FTMS) rather than in the EPMS.
- (3) Vehicles used exclusively as student training aids in Automotive Career Technical Training Programs are not considered fleet but are considered to be training equipment and, therefore, are reported in the EPMS.

### 3. Reporting and Accountability

- a. Effective July 1, 2010, all non-expendable property with an original purchase cost of \$3,000 or higher must be reported in the Job Corps EPMS.<sup>2</sup> In addition, all sensitive property, regardless of original purchase cost, must be reported. (See Section 9 for examples of sensitive property.)
- b. All fleet vehicles are considered reportable property. Because of their special category and requirements, fleet vehicles are reported separately from other property. This includes both GSA-leased and non-GSA-leased vehicles (but excludes vehicles used as training equipment in Automotive Career Technical Training programs).
- c. Property acquired via incoming transfer or donation shall be subject to the same reporting and accountability requirements as property that is purchased and leased.
- d. All property established by Job Corps to be reportable must be entered into the EPMS or FTMS within three days following arrival on site. All property (including leased or rented items) will be entered into the system with required identifying information, including location designation. Reportable items must remain on the contractor's inventory within the EPMS and/or FTMS until such time as removed following final disposition or transfer from the contract. Entries for final disposition or transfer from the contract are not made by contractors but are completed by authorized federal staff at the Regional Office. Transfers and final dispositions must be approved in advance by the region or the National Office prior to EPMS or FTMS adjustment.
- e. Job Corps contractors will establish an internal accountability system for all expendable and non-expendable property. Reportable property, as established by Job Corps in this policy, must be reported in Job Corps' EPMS. Contractors *may use* the EPMS to conduct inventory management for other non-expendable

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<sup>2</sup> This is a variance from the ETA 359 Property Management Handbook (August 2003).

inventory. Accountability systems for expendable and non-expendable property must be described in writing in the Contractor's Property Management Plan (see below) and are subject, at all times, to review and inspection by the government.

- f. Job Corps contractors must comply with the provisions of this policy, and establish and submit a Contractor's Property Management Plan (CPMP) annually for review and approval by the appropriate Regional Office. CPMPs are due to Regional Offices, attention Regional Property Officer, by October 1 of each year. Regions will review and approve CPMPs by December 1 for implementation annually by January 1. Deficiencies in the CPMPs will be identified by the regions, communicated to contractors, and addressed adequately and timely. The government's assumption of risk may be revoked where a Contractor's Property Management Plan is not approved, or where identified deficiencies have not been sufficiently addressed by the contractor. Copies of the regionally approved CPMP will be held in the offices of the Center Director, Property Manager, and Fleet Manager, or other managers of the contractor, as appropriate, and will remain available on-site for inspection by the government.
- g. The CPMP will include the following elements for all government-furnished property held by the contractor, and its subcontractors, where the use of government-furnished property exists:
  - (1) System and procedures used to account for reportable property using a "cradle to grave" approach, from authorized purchase requests (Property Requirements Lists [PRLs]), to receipt of property, to assignment, use, protection, and disposition
  - (2) System and procedures used to account for non-reportable property (including expendable inventory)
  - (3) System and procedures used to account for and report fleet vehicles
  - (4) Management and security measures established to protect and preserve property, including fleet; ensure integrity of purpose; and control and monitor use
  - (5) Systems and procedures used to ensure that environmentally friendly practices are implemented for property and fleet use, maintenance, and disposition
  - (6) Training provided to center management and staff for appropriate use, security, transfer, and disposition of property
  - (7) Actions taken in instances of waste, fraud, misuse, or abuse of property
  - (8) Actions taken in instances of theft or otherwise missing property

- (9) Names and titles of key personnel included in the contractor's property management system
  - (10) Specific actions taken to ensure subcontractor implementation into the contractor's property management system
  - (11) A basic summary report that reflects, for the prior fiscal year (10/1 through 9/30): (a) all ETA 396 Reports of Missing or Damaged Property submitted for the contract, and subsequent determinations by federal officials; and (b) a report of the total number of property items that were moved into disposition, with a breakdown reflecting how many of those items were "reportable" property items vs. "non-reportable" items, and disposition type, to include redistribution (contractor-to-contractor transfer), GSA transfer, donation, recycling, or disposal
  - (12) Continuous improvement and quality assurance systems
- h. Identification and labeling of property are key accountability elements (see Section 6, Contractor Requirements).
  - i. Quarterly inventories conducted by the contractor, property assessments and surveys conducted by federal (or federally designated) officials, and annual inventory certifications, are key accountability elements (see Section 6, Contractor Requirements).

#### **4. Support Elements**

- a. Administration and Management: The Job Corps National Office establishes the GFP Administration Program for contractor-held property, sets policy, provides guidance, and interprets rules and regulations, as appropriate. Job Corps Regional Offices implement policy, oversee, and monitor property actions in their regions. For GSA-leased fleet vehicles, the General Services Administration provides specific guidelines and requirements for use and for reporting in addition to those set by this policy.
- b. Technology Systems and Reporting: Both the EPMS and FTMS are web-based applications that are accessible through the Job Corps CITRIX system. The Job Corps Data Center provides training and technical assistance to system users on all Job Corps CITRIX applications.
- c. Training and Technical Assistance: On-demand and web-based training is provided to Job Corps personnel with key responsibility for management of property. All federal Project Managers/CORs, Regional Property Officers (RPOs), and other individuals as assigned by Regional Directors or the National Property Officer must complete training as directed. Additional technical

assistance is made available as appropriate by the Job Corps National Office, Job Corps Regional Offices, and the General Services Administration (GSA).

- d. Surveys and Assessments: Job Corps contractors will perform surveys of property on an ongoing basis. They will also perform assessments of their property management program quarterly, at the time of internal 100% inventory audits conducted by the contractor. Regional Project Managers and/or Regional Property Officers will conduct desk- and on-site monitoring of contractors' property programs, as appropriate.
- e. Forms and Template: Forms and templates to document and support property actions are contained in the ETA 359 Property Management Handbook (August 2003) appendices. Where possible, property actions will be documented electronically, and where paper copy is used, forms and templates will be made available on the EPMS and/or FTMS for download and printing. Property forms may be updated, changed, or eliminated as goals to optimize electronic tools, improve efficiency, and reduce paperwork are met.
- f. Continual Improvement: The Job Corps National Office conducts periodic review of policies and procedures for the administration of contractor-held GFP in Job Corps. Suggestions and concerns may be forwarded to the Office of Job Corps, U.S. Department of Labor, Employment and Training Administration, 200 Constitution Ave., NW, Washington, DC 20210, Attention: National Property Officer.

## 5. General Roles and Responsibilities

- a. Acronyms for Key Personnel: For purposes of the remaining sections of this policy, references to the Contractor's On-Site Property Manager will appear as "CPM." References to the Contractor's On-Site Fleet Manager will appear as "CFM." References to the federal Regional Property Officer will appear as "RPO." References to the federal National Property Officer will appear as "NPO." References to the federal Contracting Officer will appear as "CO."
- b. An effective system for managing Job Corps contractor-held property necessarily includes adherence to the following organizational roles and responsibilities. Detailed duty descriptions are included in Section 7.
  - (1) Contractor - On-Site: includes Center Director, Administrative Manager, CPM, CFM, property custodians, and appropriate IT system users. It is expected that these personnel will be familiar with the guidance contained in this policy and with resources that are available if further information is needed. Contractors must ensure that all on-site personnel understand appropriate uses of government property, implement its requirements, take all prescribed and reasonable measures to protect and preserve property, and that appropriate training is undertaken at each level.

- (2) Contractor - Corporate: includes upper management with oversight responsibility for contract performance. Corporate managers must ensure adherence to this policy and ensure that the approved CPMP is responsibly implemented, monitored, and included in regular corporate management reviews, with corrective actions established.
- (3) Job Corps Regional (Federal) Officers: includes Project Managers/CORs and Regional Property Officers (RPOs), will provide approvals for specific actions/requests, review and approve CPMPs, enter EPMS adjustments, and provide guidance to contractors.
- (4) Job Corps National (Federal) Officials: includes the NPO designated by the Job Corps Administrator, and the National Job Corps Data Center. The NPO establishes Job Corps' program for administration of contractor- held GFP, in conjunction with DOL, GSA, and other agencies, and works with the Job Corps Regional Offices and contractors to implement and fulfill the goals of the program. The Job Corps Data Center develops and maintains reporting systems for property and fleet, generates reports as requested by National or Regional Offices, and provides training and technical assistance for users of the EPMS and FTMS.
- (5) Property Support Contractors: serves as directed by the Job Corps National or Regional Offices. They have limited delegated authority to conduct property reviews and transactions on behalf of the government, and to provide general technical assistance.
- (6) Federal Contracting Officers (COs): incorporates Job Corps property policy into DOL/Job Corps contracts, provide formal authorization for contractors to use official government supply sources, and who determine and communicate the extent of contractor liability in cases where relief has not been granted for missing or damaged property.

## 6. Contractor Requirements

- a. Cognizance and Demonstration of Responsible Stewardship: Job Corps contractors will be cognizant of and maintain knowledge of policies and procedures pertaining to government-furnished property for Job Corps contracts, and will ensure that appropriate management practices are actively in place to establish an effective and responsible system that demonstrates good stewardship of public resources and taxpayer dollars.
- b. Compliance: Contractors will comply with all provisions of this policy and all federal guidelines as outlined in the CFR, FMR, FAR, and Job Corps' Policy and Requirements Handbook (PRH). For fleet vehicles, contractors also will comply with terms of use and guidelines established by GSA. Contractors will establish and implement procedures to control the use of government property in a way that

protects, preserves, and maintains the property in good operating condition, and must ensure that all government property is used only for the purposes contractually set forth.

- c. Property Management Plan: Contractors will develop and implement an approved Contractor Property Management Plan (CPMP) that describes effective on-site property management elements, as designated in Section 3 of this policy.
- d. Communications: Contractors must inform the appropriate federal Project Manager of property requirements in the early stages of project preparation, and provide updated information as needed. Property actions involving purchases, acquisitions, transfers, donations, disposals, and other significant actions must be communicated to the federal Project Manager in advance for approval. For fleet vehicles, requests to add, exchange, or remove vehicles from a location require the advance approval of the federal Project Manager as well as the NPO. Federal Project Managers also must be informed when a new GSA vehicle arrives on center, either as a replacement for a vehicle as part of GSA's replacement cycle, or as a new addition to the fleet. Similarly, federal Project Managers also must be informed when GSA reclaims a fleet vehicle. The contractor also will inform the federal Project Manager and RPO promptly with regard to changes in contract property or fleet personnel.
- e. Duty Designation: Contractors must designate an employee as the on-site CPM, who must become familiar with the provisions of this policy and serve as the point of contact for property-related actions, communications, directions, and questions from site personnel. Contractors also must designate location custodians who will assume day-to-day charge of property assigned to their areas and under their immediate supervision. This may include instructional, residential, recreation, maintenance, security, administrative, and other staff throughout various operational locations. The CPM will ensure that location custodians conduct recordkeeping and maintain records for property assigned to their respective areas, and will hold regular meetings (at least quarterly) with location custodians to review and discuss the status and disposition of property. Contractor property meetings will include center administration, CPM, CFM, and location custodians. Records of meetings will be maintained as part of the CPMP, and will remain available for inspection by federal officials at all times.
- f. Training: Contractors must ensure that employees with designated responsibility for property management, fleet management, and custodianship receive appropriate information and training, to include this policy, web-based training, and face-to-face training as appropriate; are made aware of their responsibilities; and can demonstrate competence related to their property-related duties.
- g. Recordkeeping: Contractors will retain and secure property and fleet records for inspection by the government during the contract performance period. Property records will be maintained by the CPM, except as otherwise stated in this policy,



and will include completed forms to document receipt, maintenance, movement, modification, and disposition of property; records of quarterly inventories; property meetings; reports of missing and damaged property; staff training; and related support documentation. CFMs will maintain records similarly, as adapted to fleet and fleet reporting systems. Copies of annual property certifications will be maintained by the Center Director or Administrative Manager. Following contract closeouts/transitions, all property records will be preserved and retained on site for a period of six years and three months after final payment to the contractor. Property records subject to dispute or audit beyond this period of time must be retained through resolution and are subject to rules established by CFR Title 41.

- h. Inventory Requirements: Contractors are required to perform (a) a 100 percent-inventory certification of all reportable property on an annual basis, and (b) three 100 percent quarterly inventories of all non-expendable property assigned to the contract. Annual certification packages must be completed by the last month of each contract year (for example, contracts with contract year performance periods of September 1 through August 31 must be completed by August 31, for each contract year), or when requested by the National Property Officer. The annual certification process is intended, in large part, to validate a Master Property Inventory List annually. During the quarterly and annual inventory process, items that are identified as damaged, destroyed, or missing will enter the disposition process and be reported to federal officials as outlined in this policy. Annual inventories are conducted by contractors during the last month of each contract year, are reconciled and certified by a corporate official, and submitted in full to the federal Project Manager/COR, along with a summary memorandum. The summary memorandum will include a total number of items certified and will present and discuss any outstanding reconciliation issues. Failure to submit, or submission of incomplete or inaccurate annual property certifications, will be addressed by the Contracting Officer and reflected on contractor performance reports.
- i. Identification: All GFP in Job Corps will be permanently marked at time of receipt by the contractor as “PROPERTY OF U.S. DEPT OF LABOR.” Where permanent marking is not possible, semi-permanent markings or labels will be affixed in conspicuous locations on the surface of the property so that they are clearly visible. This applies to all non-expendable property. Reportable property must be bar-coded using the established bar-coding system, wherever feasible. Extra care will be taken to ensure that property unable to host bar-code labeling is accounted for and reported. Property not belonging to the government, such as some Student Government Association (SGA) or Labor Union/NTC property, should be marked as such, be easily distinguishable from government property, and should not be bar-coded. Rented and leased property will not be permanently marked; however, secured labels will be affixed to the item, reading, “Assigned to U.S. Department of Labor.” CPMs, CFMs, and location custodians will inspect property regularly, and at least quarterly, to ensure that GFP is identified, labeled,

and bar-coded as required.

j. Procedures: Contractors must:

- (1) Conduct quarterly and annual inventories and recordkeeping, as described above. Prepare an annual CPMP and submit to the federal Project Manager by October 1 for review, approval, and implementation by January 1.
- (2) Enter all required information for reportable property in the Job Corps EPMS. An item code is required at the time of initial reporting. Item codes help to ensure the proper identification of an item, particularly those that are non-serialized, and help to reduce guesswork during physical inventories. Item codes are obtained from a drop-down selection menu contained in the EPMS database.<sup>3</sup> Obtain user authorization and access from the JCDC. Direct technical EPMS system questions to the JCDC Help Desk; direct questions related to policies and procedures to the RPO.
- (3) Enter all required fleet data in the FTMS, at least monthly. Fleet reporting must occur by the 25th of each month for the prior month.<sup>4</sup> Obtain user authorization and access from the JCDC. Direct technical FTMS system questions to the JCDC Help Desk; direct questions related to policies and procedures to the federal Project Manager.
- (4) Receive and subdivide property for the contract into logical units specified by Location Codes within the EPMS, and assign a Property Custodian to each location. (All facility areas on center will have an assigned Property Custodian.)
- (5) Maintain a historical file containing records of property procurement, acquisitions, transfers (incoming, outgoing, and internal), modification/cannibalization, missing/damaged property, repairs, dispositions, donation, recycling, abandonment, and destruction.
- (6) Identify and report missing, damaged, or destroyed government property using the Report of Survey/Inventory Adjustment Report (Form ETA 396), and forward to the Regional Office. All contract staff must be trained on the requirement to report missing or damaged property immediately to senior management. Reports to law enforcement officials will occur at the time it is discovered that property is missing. Efforts to report, locate, and recover missing property will be documented and maintained with the contractor's property records and will be submitted

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<sup>3</sup> Item codes have been updated and streamlined in the Job Corps EPMS (as of July 2010). Item codes will thus vary from those shown in the ETA 359 Property Management Handbook (August 2003).

<sup>4</sup> This timeline has been updated to allow time for receipt by contractors of monthly GSA statements; these statements contain data required for FTMS reporting.

concurrently with a completed ETA 396 to the federal Project Manager within 30 days of identification of loss. Items below the \$3,000 EPMS reporting threshold may be listed together, if loss is identified at the same time, and reported on a single ETA 396. Items at or above the \$3,000 reporting threshold will be reported separately and should not be listed together. Loss of items valued above the reporting threshold must be reported immediately, upon identification of loss, by e-mail to the Regional Project Manager and RPO, to be followed within 30 days by the ETA 396 report along with supporting documentation. The submission of an ETA 396 form to the Job Corps Regional Office automatically requests relief of liability; however, submission of the ETA 396 does not automatically grant relief to the contractor and should not be assumed.<sup>5</sup>

- (7) Receive prior written approval from the federal Project Manager of both the sending and receiving centers for all transfers of property requested from one contract to another. Items that are listed in the Marketplace (Redistribution) section of the EPMS, and are picked up by another contract, will be documented via a fully executed SF-122 Transfer Order – Excess Personal Property. Note that block 14 in this instance does not receive GSA approval, but DOL approval by the appropriate PM (who may delegate signature authority to the Regional Property Officer). **Under no circumstances will property be moved from one contract to another without prior written approval and signature of the appropriate federal staff**, and timely adjustment to EPMS inventories.
- (8) Conduct transfer or movement of property within the same contract (and at the same site of operation) through use of a Property Transfer Request, which is a hand receipt, **and maintain hand receipts with the records of the receiving custodian**. Hand receipts should include the description of the property, serial number (if serialized), old location code, new location code, signature and date of sending custodian, and signature and date of receiving custodian. Copies of all hand receipts must be provided to the CPM at time of transfer. If the property location transfer is expected to exceed 30 days, the CPM must forward copies of hand receipts to the RPO as part of the contractor's quarterly submission package, for location adjustments in the EPMS.
- (9) Conduct physical modification or cannibalization of property **only as authorized in advance in writing by the federal Project Manager and RPO**, and only where such action constitutes the best available option. CPMs will ensure that items are not "stripped for parts" without advance approval from the Regional Office. Complete records of cannibalized items will be maintained with the appropriate authorizing document(s).

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<sup>5</sup> The preceding paragraph contains Job Corps procedural updates that may vary from the ETA 359 Property Management Handbook (August 2003).

- (10) Keep documentation for property transactions up to date, including those requiring approval of the federal Project Manager, and send routine actions at least quarterly to the Regional Office for review and processing.<sup>6</sup> Regional officials will review and approve transaction requests as appropriate, and process within 30 days (see Job Requirements for Property Administration – Regional Staff). Non-routine or high-priority actions will be forwarded and processed based on an agreed-upon timeline between the contractor and the Regional Office.
- (11) Maintain a suspense file with records of pending transactions (i.e., pending ETA 396 reports/requests, pending disposition requests, etc.). Contractors will follow up with federal Project Managers monthly to finalize outstanding or pending transactions. Transactions pending beyond 90 days in the regions must be communicated by either the RPO or the contractor to the NPO.
- (12) Provide for the appropriate and timely disposition of excess property (see Appendix 505a, Disposition of Excess Property).
- (13) Coordinate with the federal Project Manager, and with GSA, as directed, to conduct leased-vehicle acquisition, utilization, and maintenance in accordance with this policy and with GSA guidelines. Requests for additions, removals, or exchanges of GSA-leased vehicles, or for vehicle maintenance outside of GSA-authorized guidelines or service locations, will be sent to the federal Project Manager for review and approval, subject to final approval by the National Office. Except as otherwise noted herein, contractors and federal staff will follow the ETA 359 Property Management Handbook (August 2003), Chapter IX, Motor Vehicles, for policies and procedures regarding Job Corps fleet vehicles.
- (14) Ensure that a Property Requirements List (PRL) is completed by the contractor and submitted to the federal Project Manager for approval, for all property that the contractor wishes to procure with government (contract) funds, as follows:
  - (a) Items with a unit cost of \$200 or above require the advance review and approval of the federal Project Manager/COR prior to purchase. **Advance PRLs** will be submitted to the federal Project Manager/COR as needed by the contractor.
  - (b) Items with a unit cost of under \$200 do not require advance review and approval of the federal Project Manager/COR prior to purchase. These PRLs may be executed for purchase by the

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<sup>6</sup> This represents a Job Corps procedural variance over the ETA 359 Property Management Handbook (August 2003), Section 3e(3), which requires contractors to forward supporting documentation for all property-related transactions within 10 days.

contractor. However, copies of all **internal PRLs** will be submitted quarterly to the federal Project Manager/COR along with the quarterly property report for review at the discretion of federal officials.

The PRL format must be consistent and numbered by the contractor in strict numerical sequence. PRL numbers must be easily identified on each page, should the PRL exceed one page or contain attachments. All PRLs shall be readily accounted for and available for review on-site at the request of federal officials. Each PRL must contain the following elements:

- Next sequentially assigned PRL number
- Clear description of the item intended for purchase
- Purpose of item
- Department and location where the item will be assigned
- Unit cost
- Suggested vendor name and location
- Date of purchase (for internal PRLs), or  
Expected purchase date (for advance PRLs)
- Requestor's name
- Date of request
- Date received and name of receiver (noted for each item immediately upon receipt)

PRLs are maintained in the on-site purchasing office, matched with shipping and receiving documents upon arrival of goods, and are subject to inspection as part of center assessments, survey, and reviews.

Note that requirements for PRLs are separate from requirements for EPMS reporting. Although PRLs are an important part of property accountability, the PRL process has no bearing on what property is reported in the EPMS.

- (15) Ensure that government excess is the first source of supply for obtaining property and equipment, whenever feasible, and that government supply sources are used when they are available and cost effective. Typically, these are GSA supply sources. A Letter of Authority will be received by the contractor from the CO or federal Project Manager/COR, authorizing the contractor to use government supply sources during the performance period. Contractors must possess a Letter of Authority to obtain an Activity Address Code (AAC) and a GSAXcess User ID and password, in order to access GSA supply sources. AACs are contract-specific and are assigned by GSA through the Job Corps Regional Office (usually the RPO); they also may be facilitated through the Job Corps National Office.

The GSAXcess User ID is specific to individuals, assigned for DOL/Job Corps contractors by GSA through a designated official at the Department of Labor in Washington, D.C. **A valid AAC must be established in advance and as part of an application for a GSAXcess user ID.**

- (16) Strictly control the use of GSAXcess. Contractors must inform the RPO when an employee applies to become authorized to screen for or list government property and when authorized individuals have terminated from the contract. Such notices must be included in the contractor's quarterly Property Report to the region.
- (17) Ensure that a Property Custodian is designated by the Center Director for each facility area, performs regular audits of property inventory under their stewardship, as appropriate, and immediately reports missing or damaged property to senior management.
- (18) Submit a Property Report quarterly to the RPO, to include:
  - (a) Results of quarterly 100% inventory (for prior quarter)
  - (b) Reports of missing or damaged property (ETA 396 forms, with supporting documentation)
  - (c) Copies of hand receipts (for permanent location changes)
  - (d) Other requests (e.g., SF-120s, 122s, etc.) for approval by the Regional Office
  - (e) Notes from quarterly property meetings
  - (f) List of key personnel (with duties for property or fleet, noting any removals or additions)
  - (g) Training certificates or documentation of completion
  - (h) GSA Activity Address Code (AAC) for the current contract
  - (i) List of existing GSA system users (User IDs), noting removals and additions
  - (j) Highlights, problems, and concerns
- (19) Ensure that contract closeout procedures are followed as outlined in the ETA 359 Property Management Handbook (August 2003) policy. Incoming and outgoing contractors will initiate a side-by-side, 100% physical inventory as soon as possible following notice of award. The outgoing contractor will complete a full reconciliation of all property, including all missing or damaged property (by forwarding a completed ETA 396 form to the federal Project Manager/COR not less than 15 days prior to contract end/changeover), and will present a reconciled property inventory of all expendable and non-expendable property, certified by a corporate official, at time of contract end/changeover.<sup>7</sup>

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<sup>7</sup> Some variance with ETA 359 Property Management Handbook (August 2003).

## 7. Duty Requirements for Property Administration

### a. Center/Contractor Property Managers:

Each Job Corps contractor will appoint a Contractor Property Manager (CPM) who is a member of the contractor's operational management team, and has primary responsibility for ensuring that GFP is appropriately identified, used, maintained, protected, accounted for, and reported as required. The CPM will ensure that the procedural requirements of this policy and subsequent updates are implemented; the contractor has established and implemented an approved CPMP; reporting occurs in the EPMS and FTMS as required; documentation is executed and maintained as directed by this policy and by federal regulation; routine quarterly and annual 100% inventories are conducted for all GFP (expendable and non-expendable); location and area inventories are conducted as needed (e.g., following incidences of damage or theft); records are maintained and protected; incidences of loss, damage, destruction, and theft are identified, reported, documented, and processed as prescribed; excess property is identified and entered into disposition status expediently; repair logs are maintained; modification/cannibalization of property occurs only in rare instances of best available option and as approved in advance by the region; Property Custodians are assigned by the Center Director and lists of Property Custodians remain up-to-date; quarterly Property Meetings are held and documented as outlined in this policy; GSA systems are utilized as required and to the maximum extent possible; quarterly submissions, as designated in this policy, are sent to the region; training is provided to center staff, particularly to Property Custodians, to ensure the appropriate use and protection of property; coordination occurs with on-site administrators, fleet, IT, safety and security managers, location custodians, and others as appropriate, to ensure that the requirements of this policy and compliance with federal regulations are fulfilled, and that integrity of use occurs for all property.

### b. Regional Staff:

- (1) Each Job Corps region will appoint a federal Regional Property Officer (RPO) to oversee property requirements and activities by Job Corps contractors within the region. The RPO will work with and provide assistance to the federal Project Managers/CORs in order to review and approve CPMPs; initiate and process Regional Boards of Survey (see Section 8, Contractor Liability); review and approve excess property, transfers, donations, modifications, and disposal of property; and adjust contractor EPMS inventory records, as needed. RPOs provide coordination with contractors in their regions to ensure that substantial stores of excess property are moved forward for disposition in a timely manner; a list of CPMs and CFMs is maintained and kept current for all contracts within the region; communication and training for CPMs and CFMs occurs as needed; GSA Activity Address Codes (AACs) are

obtained by Job Corps contractors; GSAccess User IDs are obtained by contractors, and contractors understand GSA systems that support purchase, acquisition, excess, donation, and disposal; property-related questions by centers and federal staff within the region are answered; regional participation occurs with regard to development of new policies and procedures initiated by the Job Corps NPO or Job Corps Administrator; and that communication occurs with the Regional Director, Regional Project Managers/CORs, and other staff as needed, with regard to significant property-related matters. RPOs also are responsible for ensuring that each contract-operated center within the region reports fleet data, monthly, as required into the FTMS.

- (2) Federal Project Managers/CORs hold primary responsibility for oversight of contractor-held GFP assigned to their contracts. They maintain the same property-related authorities as Regional Property Officers; however, Project Managers will consult with RPOs whenever possible when conducting property-related actions and reviews. Disputes will be brought to Regional Directors for determination. Federal Project Managers will conduct inspections and surveys of contractor-held GFP as appropriate, to include on-site and remote spot checks, desk monitoring, EPMS and documentation auditing, and other such assessments as needed. Federal Project Managers/CORs issue, at the direction of the CO, Letters of Authority authorizing contractors to use government supply sources during the performance period, and conduct review of property actions proposed and documented by the contractor, and provide approval (as appropriate). Federal Project Managers shall maintain copies of communications to contractors regarding liability (or relief thereof) in the contract file. Federal Project Managers will ensure that both outgoing and incoming contractors are informed with regard to required procedures prior to contract end/changeover, and will receive and review final property reconciliations and reports of missing/damaged property not later than 15 days prior to the scheduled end/changeover date, for review. The federal Project Manager/COR will monitor joint inventory efforts between incoming and outgoing contractors during the contract transition period, and ensure that a certified final inventory (signed and certified by an officer of the company) is submitted at time of contract end/changeover.
- (3) Regional Directors maintain the same property-related authorities as RPOs and Project Managers; however, Regional Directors hold authority to resolve property matters within the region. Regional Directors are encouraged to consult with the NPO and the CO with regard to property-related matters where property cost is \$3,000 and above, and in cases that are atypical, unusual, or appear to require guidance beyond this policy.



c. Job Corps National Property Officer:

The Job Corps National Property Officer (NPO) develops policies, procedures, communications, and training pertaining to Job Corps' Property Administration Program as outlined herein; coordinates with GSA and other federal agencies to ensure that Job Corps is in compliance with existing regulations and requirements; remains informed on systems, support, and new and emerging policies and regulations that may affect the administration of contractor-held GFP in Job Corps; coordinates with DOL and National Office officials to ensure that Job Corps' Property Program operates in alignment with DOL, agency, and other National Office requirements; interprets regulations, orders, policies, and other guidance and provides decisions pertaining to significant property matters; issues procedural waivers as appropriate; provides guidance to CORs and RPOs for actions and duties related to property administration; reviews and makes determinations pertaining to contractor liability and/or replacement of property following regional review, as designated in this policy, and forwards determinations of contractor liability to the appropriate CO for approval; establishes workgroups to address elements of administration and oversight of contractor-held GFP; writes policies and directives for approval by the National Director; holds conference calls and trainings with regional and contractor staff as needed; provides reports and information as required to the National Director and other DOL officials; inspects property activities of Project Managers/CORs, RPOs, and other staff as appropriate; and retains authority to inspect contractor compliance with Job Corps property policies.

d. National Job Corps Data Center:

Develops and maintains Job Corps' Electronic Property Management System (EPMS) and Job Corps' Fleet Tracking Management System (FTMS); provides technical assistance for EPMS and FTMS users; provides routine and ad hoc reports to the National Office and other federal officials as needed; provides input on development of policies and procedures for contractor-held GFP; and issues guidance as appropriate and in conjunction with the NPO regarding IT equipment utilization.

e. Contracting Officers:

- (1) At the time of new contract award, the assigned CO issues (or directs the COR to issue) a Letter of Authority to the contractor, to include provisions for the use of government supply sources. The Letter of Authority specifies the contract number and performance period along with other information. A Letter of Authority typically is needed by a contractor in order to obtain a GSA Activity Address Code (AAC). A copy of the Letter of Authority will be maintained by the federal Project Manager/COR, and will be furnished to the National Office or to GSA upon request.

- (2) COs will make final determinations for findings of contractor liability, following Regional and National Office reviews. COs will inform the contractor in writing of findings and required actions, or may request that the Regional Director or COR issue such communications. RPOs will monitor the status of National Office recommendations and CO decisions regarding contractor liability for replacement of property or reimbursement of costs, and will monitor contractor compliance accordingly (see below, Section 8, Contractor Liability).

## 8. Contractor Liability

- a. Contractors are responsible for the appropriate use, care, protection, and disposition of government property, and for compliance with this policy and applicable federal regulations. The CPMP is central to establishing an effective on-site property management system, a key consideration during determinations of accountability and liability. Contractors are required to inform the federal Project Manager, in writing, of instances of missing, damaged, destroyed, or stolen property, and contractors may be held liable where appropriate controls or management systems were not being followed. All instances of missing, damaged, destroyed, or stolen property will be reported by the contractor to the region. The appropriate Job Corps Regional Office will receive and review reports of all instances of missing, damaged, or destroyed property and will determine whether relief of accountability is to be granted for inventory that is under the established \$3,000 threshold. Items at or above the \$3,000 threshold will receive a formal Board of Survey at the Regional Office, and results will be forwarded to the NPO along with recommendations.

Where the Job Corps NPO finds that contractor liability is indicated and relief of accountability should not be granted, in whole or in part, he or she will work with the designated CO to establish the amount of liability and mechanisms to reimburse the government so that the contract is made whole. The CO will make and issue final determinations and provide notice to the contractor, or may request that the Regional Director or COR provide such communication in accordance with the CO's final determination.<sup>8</sup>

- b. The preferred method for reimbursement, where a determination of liability has been issued by the Contracting Officer, is **replacement of property** – for both function and cost. Replacement costs will be assumed by the contractor from non-contract funds and will be reflected in corporate accounting records, subject to inspection by government officials. In such instances, contractors will replace the property for function – in the same area on center where the loss occurred – at or close to the original purchase cost of the missing/damaged item. Only in instances where this is not feasible (for example, following contract closeout), will a check

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<sup>8</sup> This is a variance between Job Corps updated property administration policy and the ETA 359 Property Management Handbook (August 2003).

payment from the contractor for the amount of liability be forwarded to the federal Project Manager/COR. All such checks will be made payable to the U.S. Department of Labor. Upon receipt, the federal Project Manager will provide copies to the RPO and the CO to provide documentation for closeout of the pending payment, and to authorize adjustment to the contract's EPMS records. The Regional Office will then forward the contractor's original check to the NPO, along with an explanation of payment.

- c. Where missing/damaged property is reported during contract closeout, the outgoing contractor will be notified of either Job Corps' or the CO's findings, in accordance with this policy, for relief of accountability. Notice of findings/final determinations will be provided to the contractor within 30 days under normal circumstances. Such requests for relief of accountability will follow the same procedures as outlined in this policy for all missing or damaged GFP. Job Corps does not grant automatic relief of accountability in instances where more than 30 days have passed to notify contractors of liability decisions. The CO holds final authority to apply discretion, relative to the circumstances, regarding a reasonable and appropriate time frame for notice to a contractor.<sup>9</sup>
- d. Non-capitalized GFP generally is not depreciated for purposes of determining contractor liability. Conversely, capitalized property generally is depreciated for purposes of determining contractor liability. The CO may make determinations regarding depreciation at the time of his or her review, if liability is indicated.

## 9. Dollar Thresholds

- a. **The dollar threshold for reporting of contractor-held GFP in Job Corps' Electronic Property Management System (EPMS) is \$3,000.00, except for sensitive property.** All sensitive property as outlined in this policy will be reported in the EPMS. Non-sensitive property below an original purchase cost of \$3,000 is not required to be reported in the EPMS. Job Corps contractors *may* use the EPMS as an inventory system to assist in managing all non-expendable GFP, but it is not required.
- b. **There is no dollar threshold for sensitive property.** All sensitive property must be reported in the EPMS. Sensitive property includes electronics, computers, printers, telecommunications devices, video and audio devices (including DVD players), flat screens and monitors, and items that are serialized. Sensitive property also includes power tools (including powered hand tools), tool kits, and specialty tools and equipment used by career technical training (CTT) programs or by center operations and maintenance. When in doubt, contractors may contact the appropriate RPO for additional guidance.
- c. The following property is **not** considered sensitive property in Job Corps: landline

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<sup>9</sup> This is a variance between Job Corps updated property administration policy and the ETA 359 Property Management Handbook (August 2003).

telephone systems and phone sets, handheld calculators, and cell phones. However, cell phone replacements will **not** be funded from contract funds.

- d. **The dollar threshold for contractor reporting of missing, damaged, destroyed, or stolen property is \$0.00.** All property that is found to be missing, damaged, destroyed, or stolen must be reported by the contractor to the federal Project Manager/COR by way of the ETA Form 3-96, and with all supporting documentation/reports as prescribed in this policy.
- e. **The dollar threshold for Job Corps NPO review of Boards of Survey and contractor liability is \$3,000.00.** The Regional Office will review all instances of property loss under \$3,000.00, and where the region finds that relief should be granted, the federal Project Manager/COR will directly communicate that finding to the contractor and maintain such communications in the contract file. Instances of loss \$3,000.00 or above will be forwarded to the NPO along with the results of the Regional Board of Survey, for review and action as described herein.

Related documents include:

Appendix 505a, Disposition of Excess Property in Job Corps (Procedures)

Form 5-06, Property Custodian's Request to Designate Excess Property