

DIRECTIVE: JOB CORPS PRH CHANGENOTICE NO. 21-05

TO: ALL JOB CORPS NATIONAL OFFICE STAFF
ALL JOB CORPS REGIONAL OFFICE STAFF
ALL JOB CORPS CENTER DIRECTORS
ALL JOB CORPS CENTER OPERATORS
ALL JOB CORPS CENTER STAFF
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS
ALL CENTER USERS

FROM: RACHEL TORRES **Rachel** Digitally signed by
National Director **Torres** Rachel Torres
Office of Job Corps **Torres** Date: 2022.03.15
09:56:43 -04'00'

SUBJECT: Updates/Revisions to the Policy and Requirements Handbook (PRH)
to Prevent Cheating in High School Programs

1. Purpose. To add to current PRH requirements in response to the Office of the Inspector General's (OIG) recommendations that *Job Corps Should Do More to Prevent Cheating in High School Programs* (26-19-001-03-370).
2. Background. On September 25, 2019, the OIG issued Final Audit Report No. 26-19-001-03-370 *Job Corps Should Do More to Prevent Cheating in High School Programs*. In that document, the OIG made five recommendations:
 1. Establish basic preventative controls for cheating for all high school programs operated by centers.
 2. Ensure centers partner only with those school providers with established cheating or academic integrity policies that include basic preventative controls.
 3. Ensure reviews of high school programs are ongoing, consistent, and routine and, at a minimum, cover key controls to detect cheating.
 4. Regularly collect and analyze center-wide data for unusual trends or outcomes to detect cheating.
 5. Develop a centralized process to ensure deficiencies are timely mitigated and address their root causes.
3. Explanations of Changes
 - a. Chapter 5, Section 5.1 Program Management. Requirement R2. Quality Assurance.
 - Added high school diploma/equivalency programs that are subject to a Regional Office Targeted Assessment (ROTA) due to suspected integrity violations or investigated during a Regional Office Center Assessment (ROCA) will be put on an Academic Continuous

Improvement Plan (A-CIP) if the violations are confirmed during the ROTA/ROCA.

- Added excessive high school diplomas or equivalency certificates flagged for integrity issues to triggers that could initiate a targeted or full assessment.
 - Added \$200 for “Claiming credit for a HSD or HSE in OMS where cheating occurred, and the appropriate actions were not taken (see Chapter 3, Section 3.2 R9. b)” to the schedule of contractual remedies (liquidated damages) for misreporting data.
- b. Chapter 5, Section 5.1 Program Management. Requirement R8. Career Development Period Plan
- Added to the list of required documentation “Operator or center Standard Operating Procedures (SOP) establishing basic preventive controls to inhibit cheating in high school diploma and equivalency programs.”
- c. Chapter 5, Appendix 502 Financial Management for Contract Centers, F. 1. Assessment Amounts
- Removed “DOL shall assess contractor for liquidated damages” and replaced it with “the contractor agrees to pay the amounts specified below as remedies.”
 - Added to the list of assessments for misreporting data, “The operator claiming credit for a HSD or HSE in OMS for work where the operator knew cheating occurred and failed to follow the guidance in 3.2 R9.b will result in an assessment of \$200 in contractual remedies per student.”
- d. Chapter 5, Section 5.2 Personnel. Requirement R4.a. Personnel Policies
- Added to personnel management policies that policies must address any instances of cheating and clearly state the consequences for cheating.
- e. Chapter 5, Exhibit 5-1 Standard Operating Procedures
- Added “t. High School Diploma and High School Equivalency Test basic cheating prevention procedures.”
- f. Chapter 5, Exhibit 5-4 Required Staff Training
- Added “Academic Integrity Training” within the first 90 days and yearly for all center staff.
- g. Chapter 3, Section 3.2 Academics. Requirement R7. Concurrent HSD/HSE Programs
- Added definition of concurrent HSD/HSE programs: students simultaneously enrolled in Job Corps and enrolled in a local HSD or HSE-preparation program.
 - Added: Centers will submit the Memoranda of Understanding (MOU) or contract and HSD provider’s test integrity procedures to the Regional Director.

- Added to the list of HSD/HSE MOUs minimum requirements:
 - Requirement for reporting to the center by month-end cheating incidents and data irregularities that may flag staff or student misconducts
 - Requirements for submitting internal SOPs for HSD/HSE program integrity.
 - Revised the list of HSD/HSE MOUs minimum requirements to read:
 - i. Authorized body certifying attainment of the HSD or HSE certificate.
 - ii. Accreditation board(s) or agency(ies)
- h. Chapter 3, Section 3.2 Academics. Requirement R8. Online High School Program Requirements
- Added: Centers will submit to the Regional Director for approval MOUs/contracts for HSD online providers and provider's test integrity procedures. At a minimum, the MOU/contract must include:
 - Job Corps program eligibility of all participants
 - Name and location of the HSD/HSE program provider
 - Description of how services will be delivered and coordinated throughout the student's Career Development Period (CDP)
 - Requirement for reporting to the center by month-end cheating incidents and data irregularities that may flag staff or student misconducts
 - Requirements for submitting internal SOPs for HSD program integrity.
 - Methods for determining student enrollment, progress, and completion in the online HSD program
 - Authorized body certifying attainment of the HSD certificate
 - Accreditation board(s) or agency(ies)
 - Nondiscrimination clauses and commitments to adhere to all applicable state and federal laws with regard to students with disabilities (e.g., IDEA, Section 504 of the Rehabilitation Act, ADA, etc.)
- i. Chapter 3, Section 3.2 Academics. Requirement R9. HSD/HSE Program Integrity
- Added Section R9 to specify:
 - All centers must develop, comply with, and submit annually to their Regional Offices for approval SOPs that establish basic cheating prevention controls for students and staff.
 - Actions the operator must take if the HSD/HSE provider, operator staff, a Fact-Finding board, or a Job Corps' Regional Office discovers or determines that cheating took place.
 - Actions centers must take upon receipt of a report from their HSD or HSE service provider of data irregularities or any other circumstance that may flag student or staff misconduct.
- j. Chapter 2, Exhibit 2-1 Infraction Levels, Definitions, and Appropriate Center Actions

- Added to the examples in the definition of cheating:
 - Representing someone else's work as one's own or helping someone else to do so.
 - Added to Center Action that center must follow 3.2, Rule 9 if the student is retained.
- k. Chapter 3, Appendix 302a Guidelines for Determining Cheating
- Added Appendix 302a to define cheating and provide examples of staff and student cheating:
 - Cheating is defined as representing someone else's work as one's own or helping someone else to do so. Cheating can take many forms, including plagiarism. Plagiarism is defined as passing off the ideas or words of another as one's own without crediting the source.
 - *Cheating by staff* includes test/test materials misuse, test answer misconduct, testing room infractions, inappropriate grading practices, and inappropriate award of units/credit hours.
 - *Cheating by students* includes test answer misconduct, testing room infractions, and inappropriate response to course work.
4. Timeframe. The PRH website (<https://prh.jobcorps.gov/Pages/Home.aspx>) will be updated within 2 business days. All center operators must meet the new policies to prevent cheating no later than June 1, 2022.
 5. Actions. Ensure that this Change Notice is distributed to all appropriate staff.
 6. Effective Date: Immediately
 7. Expiration Date. Until superseded
 8. Inquiries. Questions about this PRH Change Notice should be addressed to Marcus Gray at Gray.Marcus@dol.gov.