

April 29, 2005

DIRECTIVE: JOB CORPS PROGRAM INSTRUCTION NO. 04-22

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

FROM: GRACE A. KILBANE
 National Director
 Office of Job Corps

SUBJECT: Job Corps Segregation of Duties, Account Management, and Account Re-Certification Policies, Procedures and Guidelines for the Career Development Services System Suite of Applications.

1. Purpose. To notify the Job Corps community of federal requirements, policies and guidelines associated with segregation of duties, account management, and account re-certification for the Career Development Services System (CDSS) Suite of Applications. The segregation of duties policy is to ensure that staff have access to only those functions necessary for their job. The account management and re-certification policy is to enforce segregation of duties whereby staff have access to only those functions necessary for their jobs. These policies, procedures and guidelines are necessary to maintain data integrity and must be enforced.

2. Background. To continue to ensure compliance with federal security requirements, the Job Corps Segregation of Duties, Account Management, and Account Re-Certification Policies, Procedures and Guidelines Program Instruction Notice is being developed to replace the Job Corps Program Instruction No. 02-03, dated September 10, 2002, Network Accounts Management Requirements.

The National Office of Job Corps Policy and Requirements Handbook (PRH) states that Center operators and Outreach Admissions/Career Transition Services (OA/CTS) contractors shall “submit written descriptions of control procedures to the contracting officer as part of the standard operating procedures

in accordance with the schedule shown in Exhibit 5-1 (Standard Operating Procedures).” (Chapter 5, Section 5.7. R4b). It also states “Control procedures shall include: 1) Separation of duties; 2) Approval requirements; 3) Documentation.” The guidelines in the Segregation of Duties Policy and Procedures, Attachment A, should be used to develop and incorporate the separation/segregation of duties as they pertain to Information Technology (IT) system access. These policies apply to the entire Job Corps community.

3. Action. Effective immediately, Job Corps Center Directors, OA/CTS Contract Managers and Points of Contact (POC) must:

- a. Review the Segregation of Duties and Account Management documents. Incorporate these policies and procedures into their agency’s Standard Operating Procedures (SOP).
- b. Verify and update their user accounts and user account profiles from the list to be provided by the Job Corps Data Center (JCDC) to each Center Director, POC, and OA/CTS Contract Manager. Lists will be sent in a separate communication from the JCDC.
- c. Fax to the JCDC Security Team the signed certification that accounts have been verified and updated in compliance with the Segregation of Duties and Account Management policies no later than June 24, 2005.
- d. Participate in spotlight training on the process for re-certification of accounts and address questions during the training session.

The user lists and complete instructions on how to verify and update the user accounts will follow in a separate email. Job Corps Center Directors, OA/CTS Contract Managers and POCs are to follow the guidelines in the attached Segregation of Duties Policy, Procedures, and Guidelines, and Attachment B the Account Management and Re-Certification Policies, Procedures, and Guidelines. Regional Offices and Job Corps center operators will ensure compliance.

In those instances where duties and system access and critical system functions cannot be fully segregated, mitigating controls must be established (at each location) as appropriate. Mitigating controls are additional procedures designed to reduce the risk of errors, irregularities or fraudulent activities. Procedures could include such controls as maintaining logs, monitoring staff activities, dual authorization requirements, and documented reviews of input/output. These procedures and supporting documents should be available for audit purposes.

No individual user should have access to all three student-tracking applications – Outreach & Admissions Student Input System (OASIS), Career Transition System (CTS), and the Center Information System (CIS) – unless special authorization is obtained from the National or Regional Office. For example, the National Office may authorize an employee to have access to all three systems to conduct internal audits at Job Corps centers.

- User ID request forms are available at the following Web site:
<http://forms.jcdcnet.org/datacenter/logins.htm>.

4. Expiration Date. Until superseded.

5. Inquiries. Questions or comments may be addressed to Lori McElroy, at mcelroy.lori@jobcorps.org, Linda Estep, estep.linda@jobcorps.org, or the JCDC Technical Assistance Center at (800) 598-5008.

Attachment A – Segregation of Duties Policy, Procedures, and Guidelines

Attachment B – Account Management and Re-Certification Policies, Procedures, and Guidelines