JOB CORPS
CHROMEBOOK ACCOUNTABILITY WORKGROUP
REPORT

Background

Job Corps Program Instruction Notice 19-17 directed centers to transition to virtual operations with students participating in various aspects of the program virtually. Job Corps has invested in information technology (IT) to support distance learning for off campus students through purchases of 20,000 chrome books and hot spots to support a national distance learning program. It is anticipated that 20,000 chrome books and hotspots will be delivered to Job Corps Centers during the month of July 2020.   The National Director formed a Chromebook Accountability workgroup to provide a flowchart, guidance, and recommendations regarding the receipt, inventory, distribution, and administration of the government furnished equipment.

Committee members consisted of federal managers and operator representatives outlined below:

Federal Staff

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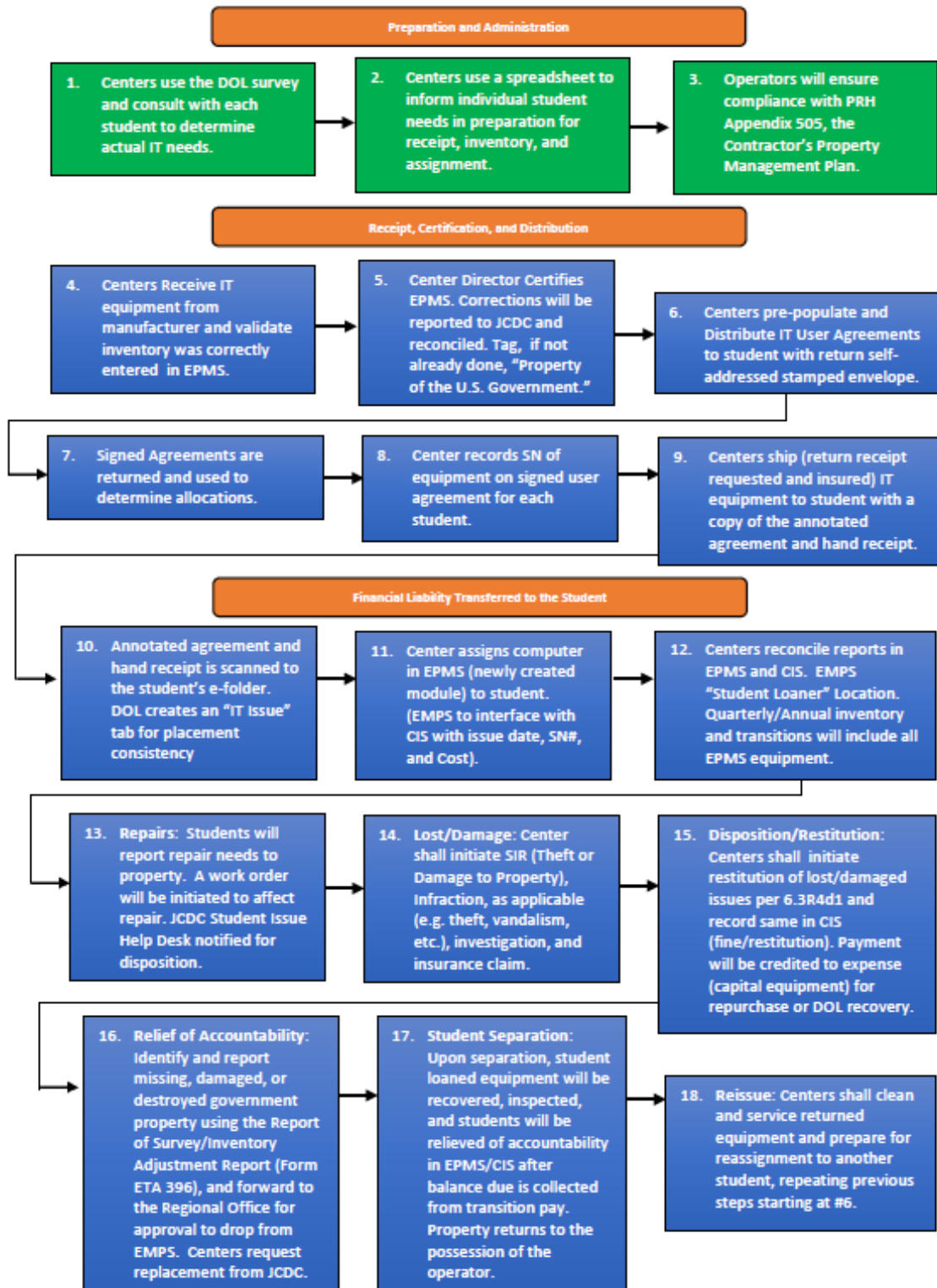
Operator Representatives

Peter Calvo, calvop@horizonsva.com – Horizons Youth Services
Andrew Carpenter, ACarpenter@CAREERSYSTEMS.com – Career Systems Development Corp.
Chris Herro, Herro.Chris@odlemanagement.com – Odle Management Group
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Derek Darter, derek.darter@usda.gov – Program Coordinator, US Forest Service

The workgroup conducted its initial meeting on Friday, June 19, 2020. A follow-up meeting was held on Wednesday, June 24, 2020. A final meeting was held on Friday, June 26, 2020.

A flow chart was prepared that illustrated the three major areas of the process, namely: 1) Preparation and Administration; 2) Receipt, certification and distribution; and 3) Financial liability transferred to the student. The workgroup's report provides further detail and guidance supporting the recommendations and in alignment with the flow chart.

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Preparation and Administration

1. Centers use the DOL survey and consult with each student to determine actual IT needs.

2. Centers use a spreadsheet to inform individual student needs in preparation for receipt, inventory, and assignment.

3. Operators will ensure compliance with PRH Appendix 505, the Contractor's Property Management Plan.

Receipt, Certification, and Distribution

4. Centers Receive IT equipment from manufacturer and validate inventory was correctly entered in EPMS.

5. Center Director Certifies EPMS. Corrections will be reported to JCDC and reconciled. Tag, if not already done, "Property of the U.S. Government."

6. Centers pre-populate and Distribute IT User Agreements to student with return self-addressed stamped envelope.

7. Signed Agreements are returned and used to determine allocations.

8. Center records SN of equipment on signed user agreement for each student.

9. Centers ship (return receipt requested and insured) IT equipment to student with a copy of the annotated agreement and hand receipt.

Financial Liability Transferred to the Student

10. Annotated agreement and hand receipt is scanned to the student's e-folder. DOL creates an "IT Issue" tab for placement consistency

11. Center assigns computer in EPMS (newly created module) to student. (EMPS to interface with CIS with issue date, SN#, and Cost).

12. Centers reconcile reports in EPMS and CIS. EMPS "Student Loaner" Location. Quarterly/Annual inventory and transitions will include all EPMS equipment.

13. Repairs: Students will report repair needs to property. A work order will be initiated to affect repair. JCDC Student Issue Help Desk notified for disposition.

14. Lost/Damage: Center shall initiate SIR (Theft or Damage to Property), Infraction, as applicable (e.g. theft, vandalism, etc.), investigation, and insurance claim.

15. Disposition/Restitution: Centers shall initiate restitution of lost/damaged issues per 6.3R4d1 and record same in CIS (fine/restitution). Payment will be credited to expense (capital equipment) for repurchase or DOL recovery.

16. Relief of Accountability: 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 for approval to drop from EMPS. Centers request replacement from JCDC.

17. Student Separation: Upon separation, student loaned equipment will be recovered, inspected, and students will be relieved of accountability in EPMS/CIS after balance due is collected from transition pay. Property returns to the possession of the operator.

18. Reissue: Centers shall clean and service returned equipment and prepare for reassignment to another student, repeating previous steps starting at #6.

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Recommendations and guidelines included in this report conforms with existing requirements as outlined in the Job Corps Policy and Requirements Handbook. Nothing contained in the recommendations are intended nor qualify as a deviation from existing policy.

Accountability

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.

The PRH and Job Corps contracts require operators to develop and maintain an inventory system to account for all property in accordance with procedures in Employment Training Administration (ETA) 359, ETA Property Management Handbook as well as PRH Appendix 505.

OJC's Webinar of May 28, 2020 announced changes to PRH Appendix 505, requiring all new equipment with an acquisition cost of $1,000 or above or considered a Sensitive item to be entered into the Job Corps' Electronic Property Management System (EPMS). Sensitive items are defined as "items, regardless of cost, that require special control and accountability due to the unusual rates of loss, theft or misuse. Example: Drones, iPads, items with memory, government cell phones, specialized tools." Job Corps SOP 15: Property Management, available on the Job Corps Community Website.

JCDC noted both the Chromebooks and Hot Spots are "sensitive" items and will be reported in EMPS. JCDC reported that the unit cost of each Chromebooks will be recorded as $500, and the Hot Spots were $1. The Chromebooks included a 3-year warranty and the Hot Spots included an unlimited annual data plan costing $258 per student per year.

Receipt of Property

JCDC Notice 19-233 JCDC News for 06-19-20 reported a center-by-center listing of student IT needs with data collected from an earlier student IT survey. Within CITRIX, this information is available at: https://drive.google.com/file/d/1B3XDFd-YSbkvvHDzqRqWl5vfTIRETAW-/view. This listing will be used by the IT vendor to ship devices to each center. It is anticipated shipments will arrive during the last week of June 2020 through the last week of July 2020. Chromebooks and Hot Spot shipments will include an expendable bag to protect each unit.

Per JCDC the property will be tagged "Property of the U.S. Government" and entered by JCDC into EPMS. Prior to shipping the equipment to the students, Centers are responsible for ensuring tags are in place and to verify the accuracy of the information entered into EPMS. Variations and corrections are to be reported to the Job Corps Data Center. As part of the verification process,

the center director shall certify the inventory to be correct and forward a copy of the EPMS certification sheets to the respective Regional Director.

Validate Student Needs

Per JCDC Notice 19-233 JCDC News for 06-19-20, centers are responsible for creating a comprehensive list of student IT needs by student name, student ID number, device(s) to be issued, device serial number, and shipping. Job Corps operators created a recommended spreadsheet and uploaded the document on the National Job Corps Association website for use by any operator.

| JOB CORPS CENTER | | CONFIRM DELIVERY ADDRESS (CIS) | | | | SURVEY STUDENTS | | Complete After Reciept or (NA) | | |
Student	SID	Address	City	State	Zip	Computer (Y/N)	Hot Spot (Y/N)	Computer SN#	Hot Spot SN#	Tracking #

DOL has drafted a *Job Corps Student Loaner Device Program Equipment and Usage Agreement*, which has gained clearance from SOL to be used. The student usage agreement details the requirements for proper use, financial consequences if the equipment is lost or damaged, and requires each student to return the agreement to the center prior to being issued any equipment. The user agreements must be completed, signed by the student, and returned to the center by July 25, 2020.

Prior to sending to students, centers will need to pre-populate the agreement with the center and student information along with the serial number as provided in the example below:

Center Name: Hometown Job Corps Center
Center Property POC: John Smith, Property Coordinator   Phone: (123) 456-7890

Student Name: Buster Brown   Student ID: 1234567
Student Shipping Address: 123 Main Street
City: Anytown   State: US   Zip: 12345   Phone: (789) 123-4567

Serial Number (Chromebook or equivalent computer equipment): ABCD-1234567

Hot Spot Serial Number: XYZ9876543

Other Digital Equipment Serial Number: N/A - IT bag

JCDC advised that a cover letter had been drafted to be forwarded to each student with the Job Corps Student Loaner Device Program Equipment and Usage Agreement. The draft was not available for committee review.

The completed Job Corps Student Loaner Device Program Equipment and Usage Agreement will be mailed to each respective student with a self-addressed, stamped envelope for return. Centers will retain a copy of the agreement in suspense pending return.

Signatures of each student, or guardian, if a minor must be returned prior to releasing any shipments. Open receipt of the properly executed agreement, the center property coordinator or designee shall sign the acknowledgement, as illustrated below, and prepare the items for shipping.

Student Signature/Date Received: _____

Parent or Guardian Signature
if Student is a Minor/Date Received: _____

Acknowledgement by Center Staff/
Date Received by Student: _____

Through EPMS, the property coordinator will use the Job Corps Student Loaner Device Program Equipment and Usage Agreement to assign the equipment to the applicable student. The property coordinator will validate the entry in EPMS and ship the equipment to the respective student. Each shipment will include a copy of the fully executed user agreement and hand receipt.

Recommendation: The workgroup recommends immediate expedited clearance of the cover letter, to accompany the Job Corps Student Loaner Device Program Equipment and Usage Agreement already cleared, to facilitate distribution of the Chromebooks

Hand Receipts

PRH Appendix 505 requires operators to "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."

Shifts in the property management handbook has eliminated sample hand receipts necessary to promote consistency throughout the Job Corps community. Most operators have retained

templates from prior ETA handbooks and incorporated the Property Hand Receipts, illustrated below, as part of the Contractor's Property Management Plan (CPMP).

Property Hand Receipt

Originating Custodian Name			Transfer Date	___ / ___ / ___
Location Code	__ __ __	Item Code	__ __ __ __ __	Serial Number _ _ _ _ _ _ _ _ _ _ _ _ _ _ _
Item Description (BE SPECIFIC)			Type of Transfer (check one) Permanent ☐ Temporary ☐	
Receiving Custodian Name			Receiving Location	___ ___ ___
Originating Custodian Signature				Date
Receiving Custodian Signature				Date

The workgroup was advised that Job Corps is in the process of updating ETA's Property Management Handbook No. 359 and Job Corps' associated PRH Appendix 505, but the workgroup did not know whether forms were to be included in these updates.

Recommendation: Until such time as DOL updates Job Corps' PRH Appendix 505, the workgroup recommends operators use the templates provided in their Contractor's Property Management Plan or the sample provided in this report.

Documentation

The fully executed Job Corps Student Loaner Device Program Equipment and Usage Agreement along with the hand receipt will be scanned and uploaded to the CIS eFolder.   JCDC advised the workgroup that an "IT Issue Chromebooks" tab would be added to an exiting tab in the eFolder.

Systems

Job Corps has established an interface between EPMS and CIS to account for IT equipment loaned to students. This interface is intended to transfer liability and accountability of the loaned equipment to the student, who would then become the custodian of the property. If any equipment loaned to students becomes missing, damaged or destroyed while in the possession of the student the center operator could employ existing Job Corps policies to recover the cost of the missing, damaged or destroyed equipment through restitution as outlined in PRH 6.3R4d1.

The Job Corps Data Center has drafted business rules and reports, which provide for an interface between EPMS and CIS and include output reports to provide for student loaner issue tracking, as illustrated below:

Center Information System							
Job Corps Center Name							
Student Loaner Equipment /Chromebooks Allocation							
As of 8/15/2020							
Student Name	**Student ID**	**Arrival Date**	**Equipment**	**Serial No**	**Assigned Date**	**Cost**	**Unassigned Date**
John Adams	12345	3/1/2020	Chromebook	3489898	8/1/2020	500	

The business rules and user guide has not been updated to inform the Job Corps community on the process for assigning student Chromebooks or output reports available in EPMS/CIS to ensure reconciliation.

Recommendation: JCDC should provide guidance on the administration of the EPMS data entry for assigning equipment to students and the output reports available in EPMS and CIS.

Civilian Conservation Centers (CCCs)

The interagency agreement with the U.S. Department of Labor (DOL) and the U.S. Department of Agriculture (USDA) does not require CCCs to utilize EMPS to account for GFE. The USDA Property Management Division (PMD) provides overall leadership, coordination, and direction for the management of USDA's portfolio of real, personal, and fleet property, which includes land, buildings, equipment, vehicles, and aircraft. The Property Management Division develops regulations, standards, and techniques concerning receipt, utilization, preservation, disposal, and replacement of real property.

Since Job Corps is using EMPS/CIS interface to track student loaner equipment, the CCCs will need access to and training related to EMPS. This will require CCC property coordinators and other administrative staff prepare and complete a Center Staff User ID Request Form, available on the Job Corps Community Website. Additionally, those staff will require training on the EMPS system and EPMS Technical Guide.

Recommendation: The USDA Forest Service, Job Corps National Office and Job Corps Data Center must coordinate and expedite completion of Staff User ID Requests Form and schedule EPMS training.

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Shipping to Students

All shipments will be insured and return receipt required. USPS insurance rates are reported at $6.40 for coverage up to $500. UPS rates are $1.05 per $100 of coverage. FedEx rates are $1.00 per $100 valuation.   All associated shipping costs will be paid via center contracts.

To reduce health risks for our USPS employees and customers and to safeguard operational and business continuity, the Postal Service has changed delivery procedures to eliminate the requirement that customers sign their Mobile Delivery Devices for delivery.

Likewise, FedEx and UPS are no longer requiring signatures on many ecommerce deliveries that have historically required signatures. The companies want to protect workers and consumers from the spread of COVID-19. It should be noted that UPS is the contracted delivery vendor for USDA.

Tracking numbers and delivery receipts will serve as a factor in determining final delivery to students. Once delivery is confirmed, center staff can contact the student to validate the serial numbers and provide support. Students who log into the computer will also validate delivery.

Control regarding insurance, signature, tracking numbers, student contacts, and monitoring will ensure the integrity of each shipment to assigned students.

Inventory

PRH Appendix 505 requires "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)."

The CPMP 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. As part of the inventory process, student IT issues will be validated with individual students, who serve as the custodian of property. Such inventory will be affirmed via siting of property and/or usage of same.

JCDC reported loaner equipment is tracked and logged and includes GPS locators. Similarly, JCDC provides ad hoc reports of students engaged in Google Classrooms during distance learning. Student engagement in either Google Classrooms or the tracking of student Chromebook usage is an invaluable and necessary tool for operators to determine the level of student engagement beyond existing systems (e.g. Penn Foster, Aztec, TABE 11/12 Academy) that capture students' time on task and engagement.

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When students are issued Chromebooks due to the lack of technology and subsequently are not using the equipment for its intended purpose, the user agreement stipulates, "I will return equipment either when I am asked to return it or depart the program."

JCDC staff mentioned that usage reports could be made available and this would allow center staff to gain visibility on each student's usage of the Chromebook loaned to them. This would provide the center with some level of monitoring student's engagement in distance learning as well as gauging the student's accountability over the loaned equipment. A suggestion was made to make these usage reports readily available to center staff within Job Corps' EIS.

The Executive Information System (EIS) is part of the CDSS Suite of Applications and enables corporate, Regional, and National Office staff to produce detailed reports about Job Corps student demographics, operational statistics, appropriations, and other data, from the national to the center level.   Using EIS, staff can generate pie charts, bar graphs, and tables that illustrate statistical breakdowns of students into categories. The graphical report is always accompanied by a table showing the numerical detail on which the pie chart percentages are based. Users can select specific start and end dates for the search criteria using the Calendar icons.

Enabling for the Chromebook user information disaggregated by Region, Center, and end user will improve accountability, increase integrity of virtual learning operations, and inform center management of the need to recover unused or abused IT equipment.

Recommendation: The workgroup recommends JCDC capture student engagement time in EIS to capture logins of the JCDC network using personal computers or smartphones and the use of Chromebooks. The data should be filtered by Region, Center, and student to determine effective utilization and security of the JCDC network and loaned equipment. Further clarification is needed from JCDC on what the EIS reports would look like and ease of accessing these reports. Centers will use the information to make informed decisions on loaned equipment recovery and student engagement, and subsequent accountability in virtual learning and other on-center applications.

Repairs

Should a student need repair or service to an assigned Chromebook, they should be directed to the center so that a work order can be initiated. PRH 5.8 R3b requires centers to maintain all buildings, grounds, roads, sidewalks, and equipment for which the center is responsible by implementing a center maintenance program that includes a tracking system that documents scheduled maintenance, work orders, Operations and Maintenance (O&M) deficiencies, and the amount of time taken to complete work.

JCDC has expanded the help desk with 5 FTEs to support the issuance of Chromebooks. The scope of services has not been communicated to the Job Corps community, it is anticipated that

students will contact the HelpDesk to address Chromebook or Hot Spot hardware issues and guidance will be provided for return and replacement of warrantied units. Technical issues related to login or software can be accomplished via direct HelpDesk calls from students via (800) 598-5008 option 8. If the helpdesk is unable to resolve the issue, JCDC will email the center POC with the disposition or assistance, as necessary to resolve student IT issues (e.g. return and replacement of equipment).

Lost/Damaged Equipment

PRH 5.4 R2 requires contractors to report significant incidents, including theft or damage to center, staff, or student property to the National and Regional Offices within 24 hours of the center being made aware of the loss. In such cases, operators must 1) investigate each significant incident, 2) initiate appropriate action to resolve the incident, and 3) identify and implement appropriate procedures to prevent recurrence, to the maximum extent possible. All such incidents shall be reported through the web-based Significant Incident Reporting (SIR) System.

As required by PRH Appendix 505 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 concurrently with a completed ETA 396 to the federal Project Manager within 30 days of identification of loss.

If as part of the investigation, if it is determined that the missing/damaged property was the fault of a student (e.g. theft, possession, vandalism), the perpetrator will be charged with the applicable Level II infraction. The center will follow the investigation and disposition guidelines contacted in PRH 2.3 R3 and afforded the opportunity to appeal the center's decision to the Regional Appeals Board.

Centers will continue to submit supplemental reports monthly, or more frequently, if new information is obtained, until a final report has been submitted. Until a report is submitted as final, a supplemental report, at minimal, is required every 30 days following the submission of the initial report.

Insurance

In response to COVID-19, school districts across the nation have invested in Insurance coverage that includes Mechanical Malfunction, Accidental Damage, Liquid Damage, Loss, Theft, Flood, Fire and Vandalism including missing or broken keys, and battery failure to protect the districts' investment in laptops and Chromebooks. Such insurance covers unlimited claim incidents for repair and replacements.

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The Job Corps operator community has solicited a vendor quote from Securranty in order to present the quote to DOL for consideration. The quotes received from the vendor offer options for $0 or $25 deductibles, ranging from $23 - $25 respectively for Chromebooks estimated at $400 and without knowing the actual model# or specifications.

The coverage includes Cracked Screen, Missing or Broken Keys, Liquid, Spill, Full Immersion, Internal damage to Product, Mechanical malfunction, Display Failure, Hard Drive Failure, Battery Failure, Wi-Fi Failure, Port Failures, Motherboard Failure, Won't Charge, Won't Power On, Power Surge, A.C Adapter, Lost or misplaced, Flood, Fire, Vandalism, Mischief, Power Surge by Lighting, Burglary, Theft, or Stolen. Protection Plan Summary followed by Terms & Conditions have been provided to members of the workgroup.

During the Job Corps operator's call on 6/24/20, members of the Job Corps community were surveyed to determine if they had available under-run funds to cover the cost of the insurance. There was unanimous agreement for an insurance recommendation. There was unanimous agreement that the costs could be borne by the Centers operations budgets from one-time savings. Enabling operator to purchase the insurance would eliminate the need for DOL to seek clearance for such a purchase, while enable the program to use existing funds to insure the property in a timely manner.

JCDC reported the model number 14A G5 with touch screens to enable the most accurate cost estimates for covered insurance.

Recommendations: Operators should purchase coverage from existing under-runs. Limitations on student liability will reduce from $500 to $25, based on the deductible and provides a much shorter period in which to collect the deductible from the student.

Disposition/Restitution

As required by PRH 6.3 R4 centers will recover Student Indebtedness and reimbursement for lost or damaged government property, with total indebtedness against a student not to exceed $500. Student reimbursement for property loss or damage must not exceed 50 percent per pay period as a deduction against student's personal allowance.

Center operators shall apply such student reimbursements as offsets to be credited to the contract or interagency agreement and used to repair and replace damaged property or for other allowable costs. Any balance remaining due from the student at time of separation may be deducted from any transition payment due to the student. Thereafter, any remaining balance due shall be treated as uncollectible.

PRH Appendix 502 outlines requirements for accounting of money received. Such reimbursements are recorded as reductions (credits) in the appropriate expense accounts (Equipment) for recovery or replacement, as determined by the Regional Office.

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Relief of Accountability

Center operators sought policy language to be held harmless of equipment issued to students when such equipment is in the student's sole possession outside the confines of any Job Corps campus, is in support of virtual learning, and cannot be monitored, managed, or inventoried by the operator.

As previously noted, PRH Appendix 505 requires operators reports to law enforcement officials 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 concurrently with a completed ETA 396 to the federal Project Manager within 30 days of identification of loss.

Operators understand 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.

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 all property matters and in cases that are atypical, unusual, or appear to require guidance beyond this policy.

In furtherance of PRH Appendix 505 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.

Recommendation: The appropriate Job Corps Regional Office will receive and review reports of all instances of missing, damaged, or destroyed property and will determine relief of accountability to be promptly granted for inventory that is under the possession of students.

Student Separation/Recovery

Centers will be responsible for recovering, inspecting, and relieving student of accountability. The recovery of IT equipment may be prompted upon student separation, resumption of on-center training, or lack of use by students as determined by center management.   Upon return of loaned IT equipment, the center will pull a copy of the Job Corps Student Loaner Device Program Equipment and Usage Agreement and hand receipt for CIS, or property suspense. The property coordinator will obtain the signature of the student or guardian, and sign the form acknowledging return. The hand receipt will also be annotated with the date of return.

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Student Signature/Date Returned:	_____
Parent or Guardian Signature if Student is a Minor/Date Returned:	_____
Acknowledgement by Center Staff/ Date Returned by Student:	_____

The center will update EPMS to remove the students as the custodian of the property. The property will return to the possession of the operator for reissuance to another student.

END