



April 16, 2021

DIRECTIVE:	JOB CORPS PRH CHANGE NOTICE NO. 20-05
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TO: ALL JOB CORPS NATIONAL OFFICE STAFF  
ALL JOB CORPS REGIONAL OFFICE STAFF  
ALL JOB CORPS CENTER DIRECTORS  
ALL JOB CORPS CENTER OPERATORS  
ALL NATIONAL TRAINING AND SUPPORT CONTRACTORS  
ALL OUTREACH, ADMISSIONS, AND CTS CONTRACTORS

FROM: Debra Carr  
Acting National Director **Debra Carr**  
Office of Job Corps

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Date: 2021.04.16 10:06:52 -04'00'

SUBJECT: Policy and Requirements Handbook (PRH) Changes to Health and Wellness Staffing (Exhibits 5-3 and 5-6)

1. Purpose. To change current PRH staffing requirements for nurses and center mental health consultants (CMHCs) by converting Health and Wellness Manager/Health Services Administrator title to Health and Wellness Director, increasing required staffing hours, and changing staffing qualifications.

2. Background. In response to COVID-19, Job Corps has implemented protocols based on Centers for Disease Control and Prevention (CDC) guidance, as outlined in *Job Corps Medical, Mental Health, TEAP, and Oral Health Protocols*. Implementing these additional tasks on Job Corps centers has increased the already stressed workload for health and wellness staff, particularly the nursing and mental health staff.

Prior to COVID-19, nursing duties and program administrative requirements have been increasing exponentially; However, staffing hours have not changed since nursing staff hours were set at current levels in the early 1980s. These increased administrative tasks necessitate a stand-alone administrative position to provide adequate oversight and program management. Additionally, there is a need for nursing hours to increase to meet both the routine PRH requirements on center and the increased COVID-19 response.

Additionally, Job Corps CMHCs report a substantial increase in the number of students returning to campus during the COVID-19 pandemic with serious mental health issues. However, there are limited mental health hours available to meet this increased need. As centers have resumed on-campus operations, CMHCs report that they are treating 50 percent or more of the returning students for symptoms of depression, anxiety, and trauma-related behaviors.

In PY 2018, Job Corps had a total of three suicides. In PY 2019, the number of suicides tripled to nine. For PY 2020 to date, there have been five suicides. Most notable, during COVID-19 since March 2020, there have been seven student suicides and one staff suicide.

Concern about suicide and suicidal ideation among our students is heightened during COVID-19, and increased CMHC hours will help provide needed mental health services.

3. Summary. Effective June 15, 2021, staffing hours are adjusted as follows:

*Health and Wellness Director:* A Health and Wellness Director position is created and it replaces both the Health and Wellness Manager and the Health Services Administrator positions. The Health and Wellness Director position is a 40-hour registered nurse (RN) position at all centers, regardless of size. The Health and Wellness Manager position for centers with an OBS of 699 or less and the Health Services Administrator position for centers with an OBS of 700 or more are removed from the required staff positions and replaced by the Health and Wellness Director position.

*Staff Nurses:* The staff nursing hours must be increased from 35 hours/100 students/week to 50 hours/100 students/week. This is an increase of one RN for nursing duties at centers. This position, combined with the addition of the RN for the Health and Wellness Director position, requires that each center have at least two full-time RNs to ensure compliance with state Nursing Board Practice Acts. Nursing Board Practice Acts limit the ability of licensed practical nurses (LPN) and licensed vocational nurses (LVN) to test, assess, triage, monitor, and administer medications. These nursing capabilities are critical during Job Corps' COVID-19 response and beyond. Adding a second RN position will provide required nursing supervision and allow certain basic health service duties to be performed that are not within the scope of practice of LPNs and LVNs per individual state Practice Acts. Satellite centers must staff an RN.

*CMHC:* An increase in mental health hours allows for earlier intervention, increased services, and better outcomes for students. The CMHC position has been increased from 9 hours/100 students/week to 20 hours/100 students/week to enable CMHCs to provide for the early identification, assessment, and treatment of youth that may be at risk.

4. Explanation of PRH Changes.

This Change Notice transmits changes to the Policy and Requirements Handbook (PRH) Chapter 5, Exhibit 5-3, Minimum Staff Qualifications, and Exhibit 5-6, Center Health Services Staffing Requirements.

PRH Exhibit 5-3 changes include:

- Change the “Health and Wellness Manager” title to “Health and Wellness Director”
- Edit Staff Nurse Primary Duties column to include “Provides nursing services within scope of practice for state-specific nurse practice act” and “Licensed Practical Nurse must be supervised by a Registered Nurse in accordance with state-specific nurse practice act.”
- Edit Staff Nurse Minimum Qualifications column to include “Registered nurse required for minimum of 1 full-time staff nurse” and “Registered nurses or licensed

practical/vocational nurses for additional nurse staffing in compliance with duties and supervision requirements of practice acts.”

- Edit the Center Mental Health Consultant Minimum Qualifications column to include “Active, unrestricted license to practice as an independent practitioner in state where center is located and does not require supervision to practice” and “Minimum 1 year of experience as a licensed independent practitioner providing assessment and treatment services to adolescents and young adults.”

PRH Exhibit 5-6 changes include:

- Edit 1. Physician bullet to change the “Health and Wellness Manager” title to “Health and Wellness Director” in the last sentence.
- Add “2. Health and Wellness Director: Forty hours/week is the minimum required level of Health and Wellness Director coverage for all centers. The Health and Wellness Director minimum qualification is registered nurse or nurse practitioner. The Health and Wellness Director may not serve as both the Health and Wellness Director and the Nurse Practitioner (NP), Physician Assistant (PA), or Certified Nursing Assistant (CNA) instructor. The Health and Wellness Director is a single dedicated position.”
- Renumber subsequent bullets.
- Edit “3. Nursing Staff: Minimum required nursing coverage (i.e., registered nurse, nurse practitioner, and licensed practical/vocational nurse) is 50 hours/100 students/week. At least one member of the full-time staff nurses must be a registered nurse. Other nursing positions may be filled by licensed practical/vocational nurses; however, nurse staffing must comply with scope of practice duty and supervision requirements outlined in the respective state’s Practice Act.

Required hours include coverage for all shifts. Centers are responsible for allocating and managing these hours across all shifts to meet the needs of the center. Required hours do not include relief coverage for annual, holiday, and sick leave because the number of such days varies by center operator. Satellite centers must staff an RN. Registered nurses on staff must not serve as the Health and Wellness Director, the NP/PA, CNA instructor, or in another paid capacity on center.”

- Edit “7. Center Mental Health Consultant (CMHC): Twenty hours/100 students/week is the minimum required level of mental health coverage by a qualified licensed mental-health professional. Except for emergencies or consults by a psychiatrist, all clinical mental health services defined as basic health care in Exhibit 2-4 must be provided on center or via HIPAA compliant telehealth platforms by the CMHC and/or by the designated post-doctoral fellow, intern, extern, or practicum graduate student under the direct supervision of the CMHC. Reviews and recommendations for applicant files and assessments and recommendations related to student separation from the program must be conducted by the CMHC.”

- Remove “12. Health-Services Administrator: In addition to nursing coverage (Item 3 above), a full-time Health Services Administrator is required for centers with a 700-plus student capacity. This individual does not have to be a nurse.”
  - Renumber subsequent bullets.
  - Edit the Minimum Staffing Requirements by Center Size table to include updated positions and increased hours.
5. Action Required. Addressees are to ensure this PRH Change Notice is distributed to all appropriate staff.
6. Effective Date. Effective June 15, 2021 and remains in effect until rescinded.
7. Inquiries. Questions about this Change Notice should be addressed to the responsible Contracting Officer’s Representative (COR) and the Contracting Officer.

Attachments

A – PRH Exhibit 5-3

B – PRH Exhibit 5-6