*Note: This is a sample SOP; each center should update this sample as needed. Ensure that edits/modifications do not remove PRH requirements and are reflective of the center’s actual applicant file review process.*

**APPLICANT FILE REVIEW SOP**

**PRH REFERENCES**

PRH 1: 1.5; Forms 1-06, 2-04, 2-05

**PURPOSE**

To provide a detailed description of the center’s policy on applicant file review and how an applicant file is processed from the time an application is entered electronically as “Pending Center Review” status by Admissions Services until there is a final disposition of the application to include appeals of applicant file dispositions. See also Movement of Applicant Files and Appeals Process.

The File Review Team (FRT) reviews applicant files to:

* Determine if the applicant’s health care needs exceed those of basic care (see PRH Exhibit 2-4 and Form 2-05).
* Determine if the applicant’s health care needs could potentially be met with disability accommodations if the applicant were enrolled in a center closer to needed and available healthcare needs resources.
* Determine if the applicant with a disability poses a direct threat to others (see PRH Form 2-04).
* Determine if there is new information only under the specific circumstances described in PRH Chapter 1, Section 1.5, R1.a, Eligibility Review, R7, Eligibility Review Due to New Information and R9, Determination of Ineligibility or Failure to Meet Other Eligibility Requirements After Enrollment.
* Determine if the applicant is eligible based upon age or income due to disability status (see PRH Chapter 1, Section 1.5, R8, Eligibility Due to Disability Status - Age (Eligibility Requirement or Criterion 2) and Income (Eligibility Requirement or Criterion 3).

**POLICY**

The center shall develop a written policy and procedure related to the center’s review of applicant files [PRH 1.5, R2; Exhibit 5-1].

**PROCESS**

**Timelines for Applicant File Review**

The applicant file review process is completed within 30 days of receipt of a complete file (i.e., all eligibility required documents are included such as a birth certificate, etc., and are accurate) except when an applicant is being recommended for denial with a referral to an alternate center where the file review is completed within 15 calendar days by the referring center and 15 calendar days by the potential alternate center as required in Chapter 1, Section 1.5, R6.

*Extensions of Time*

If more than 30 days is needed to secure essential medically-related documentation or for the applicant to be available to participate in an interview process, then the Records Manager notifies the Center Director and requests a time extension from the center’s program manager at the Department of Labor’s, Office of Job Corps’ Regional Office. The date the applicant file review extension is requested, the date the Regional Office responds, and the date the extension expires are documented on the Center File Review Tracking log and the electronic correspondence with the Regional Office is maintained by Records along with the Center File Review Tracking log.

Extension requests are submitted to the relevant Regional Office no later than 25 calendar days after receipt of the file or 10 calendar days after receipt of the file for applicants recommended for denial with a referral to an alternate center.

**Tracking of Applicant Files**

Once Admissions Services places an applicant file into a pending center review status within the Center Information System (CIS), the Records Department documents the receipt of the file into a single Center File Review Tracking log, which includes:

* File receipt date (i.e., date) Admissions Services placed file into “pending center review” status
* File review due date (i.e., 30 days after file placed into “pending center review”)
* Applicant ID #
* Applicant last and first name
* Health and Wellness Director (HWD) Reviewer (by name) and the date the initial HWD review is completed
* Other Reviewer (by name) and the date their review is completed
* Extension Requested (e.g., for files needing more than 30 days to review; also, for files with potential recommendations of denial with a referral to an alternate center needing more than 15 days to review)
* Final Disposition (Approved, Returned to Admissions Services, Recommendation for Denial)
* Disposition Date
* Days File in Review (File Receipt Date to Disposition Date)
* Date of Assignment
* Date of Enrollment
* Comments (e.g., detailed explanations of any actions taken related to the applicant file)

Wellness maintains its own internal tracking log which lists the assigned Qualified Health Professionals who review each applicant file, the date of their review, and the final disposition of the file. The HWD provides Records with the applicant file review outcome and related dates redacting any PII or PHI before doing so.

**Application Outcomes**

The FRT only reviews applicant files to determine the following application outcomes:

* If the applicant’s health care needs exceed those of basic care (see PRH Exhibit 2-4, PRH Form 2-05).
* If the applicant’s health care needs could potentially be met with a Reasonable Accommodation, Reasonable Modification in Policies, Practices or Procedures, and Auxiliary Aids and Services (RA/RM/AAS) if the applicant were enrolled in a center closer to needed and available healthcare needs resources.
* If the applicant with a disability poses a direct threat to others (see PRH Form 2-04).
* If there is new information only under the specific circumstances described in Chapter 1, Section 1.5, R1.a, Eligibility Review (see PRH Chapter 1, R7, Eligibility Review Due to New Information and R9, Determination of Ineligibility or Failure to Meet Other Eligibility Requirements After Enrollment).
* If the applicant is determined not to be eligible due to disability status (see PRH Chapter 1, Section 1.5, R8, Eligibility Due to Disability Status - Age (Eligibility Requirement or Criterion 2) and Income (Eligibility Requirement or Criterion 3).
* If the applicant withdraws their application (see PRH Chapter 1, R5.a, Withdrawal of Application) or the center FRT is unable to complete the application review because the applicant cannot be reached to complete either the clinical interview or the disability accommodation interactive process even with the assistance of Admissions Services (see PRH Chapter 1, R5.b, Incomplete Application Process).
* If there is a potential error in the initial eligibility determination (i.e., there is a determination that there was an error in the original eligibility certification process (see PRH Chapter 1, R5.c, Error in Initial Eligibility Process).
* If the applicant is cleared for enrollment.

**Movement of Applicant Files**

Once the center has received a complete applicant file (all eligibility required documents are included such as a birth certificate, etc., and are accurate), applicant files are not returned to Admissions Services, except as outlined below:

*Withdrawal of Application*

If an applicant is no longer interested in attending Job Corps and withdraws their application, the HWD notifies Records so that the reason for concluding the file review is logged in the disposition column and the disposition date column of the Center File Review Tracking log and Records can change the status in Pending OASIS arrivals to the appropriate one. If the file is already in regional review, then the HWD notifies Records and the Regional File Review Coordinator or the regional reviewer corresponding with the center instead of Admissions Services as the Regional Office retains the final decision-making authority once a file has entered regional review.

*Incomplete Application Process*

If the center FRT has attempted to contact an applicant at least twice to either complete a clinical interview or the disability accommodation process (if an applicant with a disability) and is unable to reach the applicant, the FRT contacts the Admissions Services staff to assist. If neither the center nor Admissions Services can reach the applicant to complete the required processes, the center:

* Documents each attempted contact (e.g., 2 or more) in an applicant contact log or the Center File Review Tracking Log, including the date of the contact, the medium used, and the outcome of the contact as well as the collaboration with Admissions Services and the outcome of that collaboration;
* Maintains a copy of the applicant contact log;
* Provides the log information to the center Records Department to include in the Center File Review Tracking Log (i.e., Disposition and disposition date column and comments section);
* Updates the status in Pending OASIS arrivals to the appropriate one and the applicant file is returned electronically to Admissions Services.

If the application is in regional review, the center notifies the Regional File Review Coordinator or the regional reviewer corresponding with the center via email and uploads any supporting documentation including the applicant contact log into the Wellness and Accommodation (Health) E-Folder labeled “Other” as the Regional Office makes the final determination.

*Error in Initial Eligibility Process*

If the center FRT identifies a potential eligibility concern (i.e., acceptable legal status, for example) that occurred as a potential error in the initial eligibility review process, then the center contacts the respective DOL Program Manager for guidance.

*Applicants in Residential Settings or Currently Hospitalized*

If an applicant is in a treatment facility, residential program, or is currently hospitalized, the center FRT and/or Disability Accommodation Committee (DAC) makes at least two attempts to contact the applicant using contact information provided in the applicant file (i.e., ETA 652: Job Corps Data Form) to complete the applicant file review process and make a determination regarding enrollment.

An applicant in a treatment facility or hospitalized at the time of application or during the application process has no bearing on the application process itself, and the applicant is not treated any differently than any other applicant unless the applicant has requested a disability accommodation.

Contact Made with Applicant

If the center can contact the applicant, the center completes the file review process to make a determination on enrollment.

Unable to Contact Applicant

* If the center is not able to contact the applicant, the HWD informs the Records Department that the FRT and/or DAC was not able to reach the applicant and the Records Manager documents the final disposition and disposition date on the Center File Review Tracking log and returns the file electronically to Admissions Services. See also *Incomplete Application Process*.
* If the application is in regional review, the HWD notifies the Records Manager so that they may document the final disposition and disposition date on the Center File Review Tracking log. The HWD also notifies the Regional File Review Coordinator or the regional reviewer corresponding with the center via Job Corps email since the Regional Office makes the final determination on outcomes once a file is in Regional Review.

*Other*

The center does not return files to Admissions Services outside the scope of or in conflict with Job Corps policy. Reasons for returning an application to Admissions Services are clearly documented in the Center File Review Tracking log.

**Storage and Transmission of Protected Health and Disability Information**

All documents disclosed by the applicant, other medical or disability file documentation acquired, completed health care needs or direct threat assessments, or contact logs generated during the applicant file review process are uploaded to Wellness and Accommodation E-Folders (e.g., Health and Disability) if any type of withdrawal of application occurs or there is a recommendation of denial of enrollment. See also PRH Appendix 202, Transmission, Storage, and Confidentiality of Medical, Health, and Disability-Related Information.

**Center Applicant File Review Process**

*Roles and Responsibilities of Applicant FRT Members*

The FRT’s role is to review each applicant’s file to make enrollment recommendations. The HWD serves as the FRT Coordinator. All other team members are determined by the HWD on a case-by-case basis and may include the following:

* Center Mental Health Consultant (CMHC) – reviews mental health information/needs
* Center Physician – reviews medical information/needs
* Center Dentist – reviews dental information/needs
* TEAP Specialist – reviews substance abuse information/needs
* The Non-health Disability Coordinator (DC) [insert position for your center (i.e., full time DC, Academic Manager, etc.] – reviews IEPs, 504 plans, educational reports including special education assessments.

If there are new court-related or other unusual situations that have been identified that Admission Services staff could not have reasonably known (i.e., occurred after Admission Services staff certified the applicant as being eligible or a legal issue identified within other confidential medical/disability information), then the HWD involves other staff on center as the need-to-know warrants. See also PRH Appendix 202, Transmission, Storage, and Confidentiality of Medical, Health, and Disability-Related Information.

*Initial Review of Applicant Files*

The HWD reviews the information in the applicant’s file, such as on the Job Corps

Health Questionnaire (ETA 653), the accompanying documentation that is medically related to the information on the questionnaire, or that the applicant has otherwise voluntarily disclosed, to determine the health needs of the applicant and/or to determine whether the applicant has a disability, mental health, or medical condition that likely poses a significant risk of substantial harm to the health or safety of others that cannot be eliminated or sufficiently reduced by RA/RM/AAS.

After completion of the initial review of the applicant file, the HWD completes the *Center Applicant File Review Form* in Form 1-06 for each application reviewed unless they have a reasonable belief, based on objective evidence, that an individual applicant or student has a medical condition or disability that may pose a significant risk of substantial harm to the health or safety of others, then they complete the *Center Applicant/Student File Review Form - Health and Wellness Director’s Initial Review of Applicant Files or Review of Student Documentation for Assignment of Possible Direct* *Threat Assessment* in PRH Form 2-04. Based upon their initial review, the HWD determines whether the application must also be reviewed by relevant qualified health professionals. See also *Health Care Needs* and *Direct Threat*.

*Health Care Needs*

If the HWD identifies potential health care needs that *may* exceed those of Job Corps’ basic health responsibilities (see PRH Exhibit 2-4), they refer the applicant file for review to a qualified health professional who has current, documented expertise in the medical condition(s) or disability or disabilities involved in a particular case. See *Initial Review of Applicant Files*. The health care needs review includes a review of any voluntarily disclosed medical or disability-related documentation and may include a clinical interview and/or contact with outside treating providers. Determination that an applicant’s health care needs exceed those of Job Corps’ basic health responsibilities occurs via the completion of a health care needs assessment, which includes a clinical interview, and is documented on PRH Form 2-05, Health Care Needs Assessment. See also *Recommendation for Denial of Enrollment Process.*

*Referral to an Alternate Center*

If the qualified health professional on the FRT determines that an applicant’s health care needs may be manageable in Job Corps provided the individual attends a center closer to the needed and available resources (see PRH Chapter 1, 1.5, R6(a-b)), then the qualified center licensed health professional documents this need and recommendation via Form 2-05, Health Care Needs Assessment. See also *Timelines for Applicant File Review* and *Recommendation for Denial of Enrollment Process.*

*Direct Threat*

If the HWD has a reasonable belief, based on objective evidence, that an individual applicant has a medical condition or disability that may pose a significant risk of substantial harm to the health or safety of others, they refer the applicant file for review to a qualified health professional who has current, documented expertise in the medical condition(s) or disability or disabilities involved in a particular case. See *Initial Review of Applicant Files*. An assessment must not be conducted based solely on information that an individual has a particular disability or medical condition. The direct threat review includes any voluntarily disclosed medical or disability-related documentation and may include a clinical interview and/or contact with outside treating providers. Determination that an applicant poses a direct threat to others occurs via the completion of a direct threat assessment, which includes a clinical interview, and is documented on PRH Form 2-04, Individualized Assessment of Possible Direct Threat. See also *Recommendation for Denial of Enrollment Process.*

*Post Health Care Needs or Direct Threat Assessment*

If the individual has a disability, the qualified health professional, in collaboration with the Disability Coordinator, completes the disability accommodation process to explore the available disability accommodation possibilities to reduce or remove the barriers to enrollment or to remaining in the program for a particular applicant or student with a disability. Then, either the qualified health professional or the Disability Coordinator initiates an interactive process with the qualified individual with a disability to discuss the RA/RM/AAS that the qualified health professional selected or suggested in the Post Health Care Needs or Direct Threat Assessment area of either PRH Form 2-04 or Form 2-05, as applicable. The qualified health professional or the Disability Coordinator documents whether the applicant accepts, declines, or there is agreement to modify the proposed disability accommodation(s). Ultimately, the qualified health professional determines whether RA/RM/AAS would eliminate or sufficiently reduce the barriers to enrollment.

With respect to auxiliary aids and services (AAS), primary consideration is given to the request of the applicant/student with a disability. If the applicant/student or any other individual on the applicant’s/student’s behalf requests a disability accommodation that potentially reduces the barriers to enrollment or to remaining in the program, the qualified health professional considers these requests as well. If there is concern about the reasonableness of any related requested disability accommodation (i.e., it may either pose an undue hardship or fundamental alteration to the program), the center contacts the Regional Disability Coordinator for assistance in completing a reasonableness review as per *Determining Reasonableness* in PRH Form 2-03.

*Clinical Process Summary*

The qualified health professional completes a clinical summary that includes a summary of the information from the applicant’s file, information from the clinical interview and/or discussion with outside treating providers to support the health care needs assessment.

*Disability Accommodation Process Summary*

If disability accommodations were identified within the health care needs or direct threat assessment, the qualified health professional documents a detailed explanation for why those supports would not sufficiently reduce the barriers to allow for enrollment. See *Recommendations for Denial of Enrollment*.

*Eligibility Review Due to New Information*

The center FRT or its individual members only revisits the determination that an applicant is qualified for admission (i.e., an applicant’s eligibility status) when

* There is new information presented that Admissions Services staff could not have reasonably known at the time the applicant’s qualification for admission was established; and
* The new information indicates that the applicant offered enrollment may no longer meet an eligibility requirement as outlined in Exhibit 1-1, Job Corps Eligibility Requirements, and/or Appendix 102, Guide for Evaluating Group Participation and Maintenance of Sound Discipline, as previously certified by Admissions Services staff.

If new information related to eligibility is identified, the FRT revisits the specific criteria from the Eligibility Requirement(s)(ERs) in question as stated in Exhibit 1-1. If the applicant is no longer eligible based on the criteria in the particular ER(s), the application review is stopped. The center completes PRH Form 1-06, *Center Applicant File Review Center Recommendation of Denial Form – Eligibility Review/New Information*, uploads the form and any corresponding documentation to the Health E-Folder in CIS and notifies the Regional Office by selecting the FLAG for Regional Review button also located in the Health E-Folder. The Records Manager also changes the status in OASIS Pending Arrivals to from “Center Pending Review” to “Regional Review” status. See *Recommendations for Denial of Enrollment*.

*Eligibility Due to Disability Status - Age (Eligibility Requirement or Criterion 2) and Income (Eligibility Requirement or Criterion 3)*

Admissions Services staff notifies the HWD that a specific applicant requires a disability determination review to assess eligibility under the age or income criteria or the center FRT notes that the applicant is above the typical age to qualify for enrollment.

Determining Disability

The FRT reviews the documentation of disability to determine if the applicant is a person with a disability or verifies that the disability is obvious.

* If the documentation supports that the applicant is a person with a disability or the disability is obvious, the center applicant file review process continues. No further action is taken.
* If the center determines that the applicant is not a person with a disability, then the center completes and uploads PRH Form 1-06, *Center Applicant File Review Center Recommendation of Denial Form for Age or Low Income Due to Disability Status* to the Disability E-Folder in CIS along with any corresponding health and/or disability documentation to the appropriate Wellness and Accommodation E-Folders (e.g., Health or Disability) and notifies the Regional Office by selecting the FLAG for Regional Review button also located in the Health E-Folder. The Records Manager also changes the status in OASIS Pending Arrivals to from “Center Pending Review” to “Regional Review” status. See *Recommendations for Denial of Enrollment*.

*Determination of Ineligibility or Failure to Meet Other Eligibility Requirements after Enrollment*

If, after an individual is enrolled in Job Corps, new information is received that is credible and reliable and that indicates that the individual does not meet the eligibility criteria for the program as outlined in Exhibit 1-1, Job Corps Eligibility Requirements, appropriate members of the FRT review the new information and determine, based solely on that information, whether the individual remains eligible for the program. If the team determines that the individual has become ineligible and recommends that the individual be removed, the center completes PRH Form 1-06, *Center Applicant File Review Center Recommendation of Denial Form – Eligibility Review/New Information*, uploads the form and any corresponding documentation to the Health E-Folder in CIS and notifies the Regional Office by selecting the FLAG for Regional Review button also located in the Health E-Folder. The Records Manager also changes the status in OASIS Pending Arrivals to from “Center Pending Review” to “Regional Review” status. See *Recommendations for Denial of Enrollment*.

The individual should remain on center until the Regional Office notifies the center of the need to separate the student unless they pose a risk to others or would interfere with the delivery of services to other students.

*Appeals Process* within *Center Applicant File Review*

If the center is notified that an applicant who has been denied enrollment by the Regional Office has appealed their denial decision, the center confirms that the individual has submitted or provided updated and/or new medical or health documentation to be considered. If this information is not present in E-Folder, the center initiates contact with the individual to inquire and/or inform of the need for this information. Once the information has been received, the center proceeds with a new file review (i.e., file documentation review, clinical interview, contact with outside treating providers and completion of disability accommodation process if a person with a disability).

Appeal Outcomes

1. The center notifies the regional reviewer/Regional Office via email if the individual did not provide updated and/or new medical or health documentation even after receiving a request to provide it so that the Regional Office may issue a formal notice to the applicant that the appeal review could not commence. The center returns the applicant file to Admissions Services.
2. If the center is unable to reach the applicant after making at least 2 attempts to contact and with Admission Services staff assistance, the center notifies the regional reviewer/Regional Office via email that the applicant cannot be reached to complete required clinical interview(s) and/or the disability accommodation process (if a person with a disability) so that the Regional Office may issue a formal notice to the applicant that the appeal review could not be completed due to an inability to contact them. The center returns the applicant file to Admissions Services as an incomplete application.
3. If the center accepts the applicant, the center notifies the Regional Office via email of the decision to enroll so that the Regional Office may issue a formal notice of the outcome of the appeal. The applicant’s arrival is expedited.
4. If the qualified health professional determines that the individual’s health care needs continue to exceed those of basic health responsibilities as per PRH Exhibit 2-4 or that the individual continues to pose a direct threat to others, then either the qualified health professional or the HWD uploads a new Health Care Needs or Direct Threat Assessment, as applicable, to the Health E-Folder in CIS along with any newly acquired corresponding documentation and notifies the Regional Office by selecting the FLAG for Regional Review button also located in the Health E-Folder. The Records Manager also changes the status in OASIS Pending Arrivals to from “Center Pending Review” to “Regional Review” status. See Recommendations for Denial of Enrollment.

*Reapplication to Job Corps*

After Regional Office Denial of Application

If an applicant has been denied admission by a Regional Office due to health care needs exceeding those of basic health care or because the individual poses a direct threat, they are required to provide new or updated health- and/or behavior-related documentation to reapply.

After Medical Separation

If an applicant has been medically separated, they also are required to provide new or updated health- and/or behavior-related documentation to reapply.

All new or updated health- and/or behavior-related information is uploaded to the Wellness and Accommodation E-Folder (i.e., respective Health and/or Disability E-Folders) and reviewed as part of the center’s applicant file review process. If the applicant does not provide the new or updated information, the HWD informs the applicant of the need for this information and gives them 14 days to secure it. If the individual does not provide the documentation, the file is returned to Admissions Services as an incomplete application.

If extensions of time are needed, the center requests/secures the appropriate time extensions from the Regional Office.

*Accessibility*

Accessibility concerns generally are addressed after there has been a decision on enrollment. If the DCs have accessibility concerns (i.e., person in a wheelchair who has mobility needs, etc.), the DC contacts the Regional Disability Coordinator for assistance. The FRT does not make enrollment decisions based upon individual accessibility needs.

*Recommendation for Denial of Enrollment Process*

The center FRT recommends denial of enrollment to the Regional Office. To submit a recommendation of denial (i.e., health care needs, direct threat, or new information),

* The qualified health professional or the HWD uploads all the applicant’s file documentation to the respective E-Folders in CIS (e.g., Health and Disability) including either the Health Care Needs Assessment (PRH Form 2-05) OR the Individualized Assessment of Possible Direct Threat (PRH Form 2-04) along with all file review notes. If the recommendation of denial is for new information or disability status, the center uploads PRH Form 1-06, *Center Applicant File Review Center Recommendation of Denial Form – Eligibility Review/New Information* or *Center Applicant File Review Center Recommendation of Denial Form for Age or Low Income Due to Disability Status*, respectively.
* The HWD alerts Records that an applicant file is being recommended for denial so the Center File Review Tracking log may be updated and the Records Manager can place the applicant’s status into “Regional Review” in the “Pending Arrivals in OASIS.”
* The HWD selects the FLAG for Regional Review button in the Health E-Folder.

*Disability Accommodation Process when Enrolling*

If an applicant who has been approved for enrollment has either requested RA/RM/AAS or disclosed disability status via documentation of the disability, then a center DC contacts the applicant to complete the disability accommodation process (e.g., engages the applicant in an interactive disability accommodation process to determine RA/RM/AAS needs prior to assigning the applicant a start date).

See PRH Form 2-03, *Procedures for Providing Reasonable Accommodation, Reasonable Modification in Policies, Practices or Procedures, and Auxiliary Aids and Services*, for detailed information about disability accommodation process requirements.