

September 30, 2016

<b>DIRECTIVE:</b>	<b>JOB CORPS PRH CHANGE NOTICE NO. 16-04</b>
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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:** LENITA JACOBS-SIMMONS  
National Director  
Office of Job Corps

**SUBJECT:** Policy and Requirements Handbook (PRH) Section 5.2, R4; Exhibit 5-3;  
and Exhibit 6-5

1. Purpose. To revise current PRH staffing requirements for center physician/nurse practitioner/physician assistant, including requests for waivers.
2. Background. PRH Exhibit 6-5 outlines Health and Wellness Center (HWC) staff requirements, including physician coverage on center by contracted On-board Strength (OBS). PRH Exhibit 6-5 clarifies that “scope of practice” includes supervision as required by state laws.

Supervision requirements are defined differently by state and differ among states between the Nurse Practitioner (NP) and Physician Assistant (PA) positions. In each state, PAs always require some form of physician supervision, and may not delegate orders. On the other hand, NPs may or may not require physician supervision.

The center physician is the Medical Director of the HWC. PRH Exhibit 5-3 has been updated to clarify this role. As Medical Director, the center physician is responsible for supervising all staff members who require physician supervision, and should be outlined in the center physician’s employment contract. For the NP/PA, there must be either direct supervision or a signed collaborative agreement between the center physician and the NP/PA, as required by state regulations or standards of practice.

Recruitment of a center physician can be challenging in many locations where Job Corps centers are located. Thus, PRH Section 5.2, R4 Staff Qualifications, has been updated to include annual waivers for physician/NP/PA position(s) on a case-by-case basis, with new restrictions.

The new restrictions in PRH Section 5.2, R4 state that an NP or PA may assume more coverage hours allocated with a waiver if either:

- a) The supervision requirements outlined above are met for the NP/PA.

If the recruitment of physician is challenging, then NP/PA supervision by a physician may be allowed with an annual National Office Health Unit waiver. The supervising physician will be the center's Medical Director, which means the physician is responsible for medical care on center, including delegating orders and signing pertinent health-care guidelines.

-OR-

- b) The NP can practice independently in the state where the center is located and has an active Drug Enforcement Agency (DEA) registration.

In independent-practice states, it is possible that an NP may assume the Medical Director role on center. All centers should staff a qualified individual as Medical Director of the HWC in the physician/NP position to ensure that students get safe, quality, health-and-wellness services.

All waiver requests are now submitted to the National Office Health Unit for review, in consultation with the regional health specialists. This waiver should be renewed each subcontract anniversary. A copy of the waiver should be available for review during contract renewals and during a Biannual Health and Wellness Program Compliance Assessment.

3. Explanation of PRH Changes. PRH changes are as follows:

- a. Changed Section 5.2, R4: Staff Qualifications by:

- 1. Adding (f) "Centers must request an annual waiver from the National Office prior to hiring the following health and wellness positions if the minimum coverage requirements set forth in Exhibit 6.5 are not met:

- 1. Nurse Practitioner (NP): An annual waiver for the NP may be requested if an NP assumes more coverage than 2 hours/100 students/week. If supervision is required, the supervising physician will be the center's Medical Director. This supervision arrangement must be clearly defined as part of the NP contract and in the collaborative agreement.

An annual waiver for the NP may be requested in independent practice states, where an NP with an active DEA registration could serve as Medical Director.

- 2. Physician Assistant (PA): A one-time waiver for the PA may be requested if a PA assumes more coverage than 2 hours/100 students/week. Supervision is always required, and the supervising physician will be the center's Medical Director. This supervision arrangement must be clearly

defined as part of the PA contract and in the collaborative agreement.

2. Renumbering (g) “Regional health specialists shall review all health-and-wellness staff waivers prior to National Office approval/denial of the request.”
- b. Changed Exhibit 5-3: Minimum Staffing Qualifications by updating Physician Primary Duties to read, “Provides medical services, serves as Medical Director, and provides supervision in accordance with state practice rules and regulations.”
- c. Changed Exhibit 6-5: Center Health Services Staffing Requirements by:
  1. Revising (1) to read “Physician: Four hours/100 students/week is the minimum required level of physician coverage for centers with a capacity of 2,000 or fewer students. Centers with a capacity greater than 2,000 students are not required to have more than 80 hours of physician coverage. Up to 2 hours/100 students/week of required physician hours can be assumed by a Physician Assistant (PA) or Nurse Practitioner (NP) to provide routine medical services within the licensee’s scope of practice and supervision requirements. The terms of supervision, where applicable, must be outlined in a collaborative agreement and contracts for the Center Physician and the NP/PA. The Center Physician/PA/NP may not serve as both the Center Physician/PA/NP and the Health and Wellness Manager.
4. Action Required. Addressees are to ensure this PRH Change Notice is distributed to all appropriate staff.
5. Effective Date. Immediately.
6. Expiration Date. Until superseded.
7. Inquiries. Inquiries should be directed to Johnetta Davis at (202) 693-8010, or [davis.johnetta@dol.gov](mailto:davis.johnetta@dol.gov).

Attachments

- A – PRH Chapter 5: Management
- B – PRH Exhibit 5-3
- C – PRH Exhibit 6-5