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Federal District 1, IAMAW, AFL-CIO



Revitalization of the Civilian Conservation Corps

Over the last four decades, the Job Corps has been enormously successful. However, with the pending reauthorization of its authorizing legislation, the Workforce Investment Act (WIA), we have an opportunity for significant improvement. We strongly support the legislative proposal offered by our parent and sister unions: UBC, IUPAT, IMI, NFFE-IAM, and the IUOE NTF.¹ This brief focuses on aspects especially important to the Civilian Conservation Corps (CCC).

CCC Centers differ from typical Job Corps Centers in a number of important respects:

- Typical Job Corps Centers are administered by government contractors. The Department of Labor (DOL) oversees these Centers. CCC Centers are administered by the Department of Agriculture (USDA). The DOL program of oversight with respect to its sister agency, USDA, is the same as that applied to Job Corps contractors.
- The Job Corps mission is teach disadvantaged youth the skills they need to become employable and place them in meaningful jobs. The CCC mission includes national service as well as job training. Its conservation mission and service learning approach set it apart. CCC students help protect and manage natural resources on federal lands. For example, they participate in reforestation projects and fight forest fires and respond to natural disasters as members of fire crews and incident response teams. These uniquely CCC experiences imbue them with a sense of contribution to our nation and encourage their development into mature, responsible citizens.
- Typical Job Corps Centers are in urban areas. CCC Centers are typically in remote rural areas. Rural communities benefit from their economic activity and from their public service. Indeed, state and local communities depend on CCC crews to respond to wildfires and other emergencies.
- CCC Centers offer unique vocational trade options directly related to their conservation mission, such as forestry, natural resource management, and firefighting. This can lead directly to careers in one of the federal land management agencies as well as in the private sector.

The current WIA has DOL administer the same regulatory oversight over government-run CCC Centers as it does over contractor-run Centers. The bureaucratic redundancies are highly inefficient and, since both USDA and DOL are government agencies, serve no real purpose. Historically, DOL oversight may have provided consistency for CCC Centers administered by different agencies. However, all 28 CCC Centers were recently transferred to the USDA Forest Service. Further, oversight programs designed with contractor Centers in mind are often inappropriate or counterproductive when applied to the CCC. For example, DOL measurement matrices do not consider the critical national service aspects of the CCC mission.

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These inflexibilities have frustrated the CCC's efforts to implement important initiatives. For example, USDA is prepared to implement a "shift in focus toward **green job training** [that] will provide students the tools and skills they need to compete for meaningful jobs that contribute to the revitalization of rural America and support the nation's economy."²

Recommendations

- Provide for the independent operation and management of the CCC by USDA. Under the current WIA, USDA is subordinate to DOL. Under our proposal (Sec. 147(c)), a collaborative DOL-USDA relationship is established. The CCC program would continue to be funded and administered through DOL, but its operations and management would be the responsibility of USDA under a DOL-USDA Agreement.
- Develop performance measures consistent with the mission of the CCC. Under our proposal, DOL and USDA will collaborate on the development of appropriate measures (Sec. 147(c)(2)).
- WIA currently limits enrollment to no more than two years. Extend the enrollment limit for the amount of time a student spends providing national service (Sec. 146(b)(1) and Sec. 147(c)(4)).
- Delete the current Sec. 147(c)(2), which authorizes the Secretary of Labor to outsource USDA jobs. Outsourcing and in-sourcing decisions should reside within the appropriate Department (Sec. 147(c)(9)) and conform with Office of Management and Budget requirements (e.g., OMB Circular A-76) and statutory guidelines.
- Prohibit contractors that operate Centers or have a relationship with a contractor that operates a Center from involvement with recruitment, screening, selection, or assignment of enrollees (Sec. 145(a)). This proposal is germane to the entire Job Corps program. It would eliminate a conflict of interest whereby a recruitment contractor has incentive to refer the most promising enrollees to Centers operated by the recruiter's parent company.
- Because of the unique mission and character of CCC Centers, NFFE-FSC recommends that the recruitment, screening, selection, and assignment of enrollees, as well as the placement of graduates, be under the direct administrative control of the USDA.
- Prohibit DOL from implementing policies in conflict with negotiated Labor Agreements without first bargaining with the appropriate union (Sec. 158(h)). This should go without saying, but because of the DOL-USDA hierarchy, and the fact that USDA unions have no bargaining relationship with DOL, it has been a significant problem. This is symptomatic of the layers of bureaucracy associated with the current DOL-USDA organization.
- NFFE-FSC recommends reestablishment of the critical role played by the New Deal CCC in the 1930s, when World War I veterans were welcomed into the program with no age limit imposed. The CCC can serve as an invaluable means of transitioning and training the thousands of returning veterans who are currently seeking to restart their lives and enter into productive employment.

In the 1930s, the New Deal CCC helped lift the country out of the Great Depression while building model citizens and investing in our nation's natural resources. With these reforms, we will be in a position to make similar contributions in the years to come.

¹ Legislative Proposal, Dec 10, 2009 (http://www.nffe-fsc.org/committees/legislative/ccc/091210_Leg_Proposal_Reauth_JobCorps.pdf)

² USDA Release No. 0104.10, March 5, 2010

(<http://www.usda.gov/wps/portal/!ut/p/.s.7.0.A/7.0.10B?contentidonly=true&contentid=2010/03/0104.xml>)

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