

AGENCY RESPONSE TO DRAFT REPORT



JoAnn McDougall, Vice President  
Central Region

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August 31, 2006

Mr. Michael T. Hill  
Public Ledger Building – Suite 1072  
150 South Independence Mall West  
Philadelphia, PA 19106

Re: Cincinnati Job Corps Center Draft Report Response

Dear Mr. Hill:

I am responding to the draft report that you sent to Carl Hilliard and me dated August 16, 2006. There are three areas where we disagree with your findings and recommendations.

1. You stated on pages 3 and 6 that *“We found that the Center reported students on the Morning Accountability Check report even though they had physically left the Center but not officially terminated. The Center used combinations of various leave categories to extend the students’ termination dates beyond their actual departure from the Center.”*

Response: All of the students who were on leaves or AWOL had to appear on the Morning Accountability Check because they were on leave or AWOL. The reasons for the leaves were varied, but the fact that they occurred at the end of a student’s tenure in the program did not automatically mean that they were being used to extend the termination date.

2. You stated on pages 4 and 12 that *“We recommend the Director of the Office of Job Corps notify the Cincinnati Job Corps Center to ensure that all sign-in/sign-out sheets be retained for a 3-year period.”*

Response: This recommendation referred to staff signing in and out. However, that is not a Job Corps requirement. Management & Training Corporation documents the hours that non-exempt staff work with timecards signed by the supervisor.

3. On pages 7 and 8 you referred to the PRH definition of PDOF leave. You concluded that job search was not an allowable purpose for using PDOF. *“The PRH provided that PDOF leave can be used for students involved in authorized activities off center such*

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*as: regional or national competitions or awards, work-based Learning or Vocational Skills Training off center, recruiting drives, escort duty, out-of-town job interviews, and apprenticeship jobs or armed forces processing..."*

*"...the purpose was for job search, which is not one of the allowable purposes listed in the PRH."*

Response: We believe that job search was considered a legitimate use of PDOF. The language in the PRH says "such as," so it was not considered as "limited to" those examples. You followed up on the center director's response concerning the Regional office support for using PDOF for job search. You stated that *"We contacted the Job Corps Regional Office Project Director concerning the Center Director's response and were informed that the CDSS directed the Center to follow the PRH. According to the PRH, students on PDOF leave are allowed to be off center for job interviews; it does not mention job search as one of its uses."*

We do not believe that the Regional Office ever intended to disregard the PRH, however using PDOF for job search was not viewed as violating the PRH. We have attached the Regional Office CDSS Plan that was issued in August 2001 and the center Standard Operating Procedure that was titled "JOB SEARCH LEAVE PROCEDURES (PDOF). The regional goal for centers was to place at least 90% of graduates prior to their separation dates. Students were designated as "in the zone" during their last six weeks before separation. The center's SOP was sent to the region and the terminology was never questioned. Based on these documents and the memories of those of us who worked with the region in 2001, we believe that job search was a legitimate use of PDOF.

We appreciate this opportunity to respond to your draft report. If you have any further questions, please contact Carl Hilliard or me.

Sincerely,



JoAnn McDougall, Vice President  
Central Region

CC: Anthony Grice  
John Pedersen  
Carl Hilliard

JM/jshCRO2006-52

NOTE: MTC's response to the draft report included two attachments: "Career Development Services System Plan, Chicago Region, August 2001" and the center Standard Operating Procedure entitled "JOB SEARCH LEAVE PROCEDURES (PDOF)." The attachments have not been included in this final report, but are available upon request.