

AGENCY RESPONSE TO DRAFT REPORT

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



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MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General for

FROM: EMILY STOVER DeROCCO *Emily Stover DeRocco*
Assistant Secretary for Employment and Training

SUBJECT: High Growth Job Training Initiative
Draft Report No. 02-08-201-03-390

The Employment and Training Administration (ETA) strongly disagrees with the primary findings in the Inspector General’s Draft Report related to the procurement practices utilized for non-competitive grants under the High Growth Job Training Initiative (HGJTI). In fact, we believe that the report is fatally flawed and misrepresents sole source requirements and issues. ETA adhered to federal procurement law and Department of Labor procedures as outlined in the Department of Labor Manual Series (DLMS) for awarding non-competitive grants, with minor technical issues identified.

During the course of the audit, ETA provided the Office of the Inspector General (OIG) with documentation in grant files sufficient to support that grants met the DLMS exceptions for non-competitive sourcing and provided information through staff interviews and written documents that fully support the non-competitive awards made under the HGJTI.

Below are specific responses to findings or content in the report:

- 1. While federal law encourages competitive procurement, non-competitive grant making is permissible if certain criteria are met. The non-competitive HGJTI grants met these criteria and competitive grant making has been a key component of the initiative.**

The OIG points out that federal laws and regulations encourage competition in assistance programs where appropriate. The OIG also points out on page 4 of the Executive Summary that, absent Congressional action, *there is no prohibition against awarding grants non-competitively*, as long as grants otherwise meet the procedural requirements for making non-competitive awards. [emphasis added] ETA met these procedural requirements, and nothing in the OIG’s report suggests any abuse or misuse of this method of procurement. In addition, ETA embraces the value of the competitive grant making process and, from the beginning of the initiative, expressed the intent to provide competitive grant opportunities for the second round of the HGJTI grants in each of the industry sectors. ETA has fully realized that intent and is in the process of issuing the fourth competitive opportunity under the HGJTI; the first such opportunity was announced and awarded in 2004.

- 2. There are no express requirements for documenting the decision making process for a non-competitive grant. ETA documentation can be improved, but is adequate to justify meeting DLMS exceptions for non-competitive awards.**

The OIG's draft report contains many references and assertions, and, in fact, is mainly based on the suggestion that ETA failed to meet a standard of documentation associated with the non-competitive procurement process. It is essential to note that no explicit DLMS requirement to document any decision making process exists regarding the selection of which grants to fund. ETA officials have continued to point this fact out to OIG auditors and have not been presented with any information to the contrary. In fact, the HGJTI process and documentation were unprecedented and provided much more justification than any past sole source grants. ETA does have documentation consistent with the DLMS requirement to assure that sole source procurements meet one of the DLMS exceptions for non-competitive sourcing, although not every grant record specifically identifies which exception was met. Independent of program office reviews, grant officer decisions to award grants non-competitively met the established federal standards. As the OIG points out, ETA relied heavily on the exceptions related to grants for innovative models and grants that are in the interest of the government as a result of leveraging other resources, which are both specific DLMS exceptions.

- 3. ETA decision making was based on significant research and engaged a wide array of participants to ensure that innovative workforce solutions addressing industry identified workforce challenges were selected.**

The OIG asserts that ETA could not assure the best qualified applicants were properly considered to carry out this important job training initiative. ETA disagrees with the inference in the report that inconsistencies in ETA's internal processes may have led to funding less than the "best" grants. Additionally, ETA did not enter into any grants indiscriminately as inferred on page 11.

As provided in greater detail in the attachment that was provided to the OIG, ETA implemented a comprehensive and thorough process to research high growth industries and to engage a wide array of strategic partners to better understand workforce challenges in order to set the stage for the grant making process. ETA had clear principles driving the decision making for funding High Growth grants:

- Was the proposed grant directly related to an industry identified workforce challenge in one of the targeted high growth, high demand industries?
- Was the solution the result of a collaborative process among strategic partners including business and industry, labor, education and the workforce investment system?
- Was the solution innovative?
- Was it a model that could be replicated – either as a workforce solution in the same industry in other locations or in other industry sectors?

- Where feasible, were other resources leveraged?

ETA consistently applied these principles in the decision making process in order to fund grants that were truly innovative and would model new solutions to complex workforce issues being faced in high growth industries – issues that were well explored in the High Growth executive and solutions forums.

As ETA received proposals, many individuals were engaged in reviewing them and discussing their merits for possible funding. The review process evolved over time and became more routinized, incorporating steps in the process such as development of abstracts as a starting point, in order to manage the large number of proposals requiring review and to ensure quality investments. Again, this entire process was unprecedented.

- 4. ETA decisions to exempt proposals from Procurement Review Board (PRB) review were properly researched and valid, and documentation supports that PRB review was not necessary in those cases where ETA did not seek PRB review.**

The OIG suggests in several places in the report that ETA does not have sufficient documentation to support that PRB review was unnecessary or that ETA did not properly apply the criteria. ETA strongly disagrees with both assertions. Once again, the OIG cites no express requirement for such documentation. ETA does not disagree that improved documentation may be valuable, but it is not expressly required. What is required is that the grant fall into one of the DLMS exceptions for not taking a proposal through the PRB process, such as a grant that falls under the simplified acquisition threshold of \$100,000 or a grant to a state or unit of government. ETA grants that were not reviewed by the PRB in all cases met one of the exceptions and have sufficient evidence to support that fact. ETA agrees that documenting the decision not to take a case to the PRB, while not expressly required, is desirable, and ETA will develop a form to assist in the determination and to provide file documentation.

- 5. While ETA believes the documentation provided regarding the \$7 million grant to Alaska demonstrates it was the equivalent of an earmark, the grant is also justifiable as an innovative workforce solution to ensure dislocated workers are provided education and training leading to employment in high growth, high demand industries.**

The OIG report suggests the Congressional direction related to this grant was not sufficient to require ETA funding of the grant. ETA strongly disagrees. Report language related to appropriations bills is given great weight by the Department, and there was specific language regarding the intent of Congress in this case. ETA was able to utilize H-1B fee money to fund the grant, given the activity to train workers for skills needed in high growth, high demand industries is fully aligned with the allowable uses of H-1B funds. ETA has consistently made the OIG aware that this grant was not made under the auspices of the HGJTI, but it is aligned with the Initiative on the ETA Web site because it represents a demand-driven workforce solution.

6. ETA had a control environment that ensured adherence to applicable criteria.

The OIG suggests that ETA did not promote an environment that ensured applying appropriate procurement criteria. ETA has worked collaboratively with both the Solicitor's Office and the PRB from the outset of the HGJTI to ensure that necessary procurement requirements associated with non-competitive grant making were followed. With minor technical exceptions related to completion of conflict of interest statements and the grant modification process, which are in the process of being corrected, ETA has fulfilled its obligation with regard to the requirements.

7. The 11 grants (15 occurrences) identified in the report as not having demonstrated justification were, in fact, justified.

In the chart developed by the OIG found in the Exhibit which details all of the grants reviewed as part of the audit, the OIG inaccurately identifies the 11 grants (15 occurrences) as not demonstrating justification for the applicable DLMS exemption. The OIG separates these occurrences into three different categories.

- The OIG asserts nine are not justified generally. While ETA may not have identified the specific applicable DLMS exception that applied at the time of the grant, ETA provided sufficient evidence in the grant files to support that each of the nine grants is innovative and/or meets one of the other criteria.
- The OIG suggests that funding a grant at less than the requested amount and under the simplified acquisition threshold is inappropriate. ETA strongly disagrees with the assertion that providing a grant for less than the simplified acquisition threshold of \$100,000 when the proposal request was for a greater amount was somehow improper. Both historically and currently, ETA frequently makes grants for less than the amount requested and applies statements of work and grant requirements accordingly. There is no express requirement for documentation of the decision to reduce funding in these cases, which the OIG has acknowledged. There is only the need to ensure they meet the DLMS criteria for non-competitive awards and the need to align the statement of work with the amount funded.
- The OIG also asserts that in four cases, ETA improperly identified the grantee as being a unit of state or local government and, therefore, should have taken the proposals to the PRB. ETA actively consulted with staff in the Office of the Solicitor to provide an opinion on this issue, a memorialization of which was provided to the OIG. The Solicitor's Office advice disagrees with the OIG's interpretation of the DLMS exception from PRB review for state or government entities (pages 9 and 11). DLMS 836(D)(1)(a) specifically exempts grants "awarded to state or local governments and agencies thereof (includes state and local entities designated by the state or chief elected

official as a program grant recipient . . .)” ETA, on the advice of the Solicitor’s Office, interprets this section to exempt from the PRB process grants to local workforce investment boards that are program grant recipients under the Workforce Investment Act and have been designated by chief elected officials. There is nothing in the DLMS that indicates this designation is related only to the grant in question. This section can also be similarly interpreted to exempt a community college that is a program recipient of a state-run community college system as in the case of the grant to the Kentucky Community and Technical College. Therefore, ETA disagrees with the inclusion of these grants in the OIG’s report as not being a proper exception to the DLMS requirement for taking a case to the PRB.

8. There is no express requirement for “consistent documentation” of the review process for grants awarded non-competitively.

Although there is no such requirement, ETA did develop procedures to support the review process, such as abstracting. Abstracting was not considered “documentation,” but rather was a tool to support the internal review and decision making process. Therefore, the OIG’s assertion that 39 grants did not have proper documentation due to something related to the abstracting process is erroneous.

The abstracts were seen as a beginning point for discussion as part of the decision making process. Additional information was frequently requested following the initial abstract, and it was not uncommon to reevaluate proposals and abstracts as part of the decision making process.

Citing that conflicting information on abstracts related to the final award amount is an indication of improper grant making is not accurate and only suggests that the author of the abstract had an opinion that was not ultimately shared by other ETA leadership engaged in the decision making process. The same is true for the two cases cited where the initial recommendation was not to fund the proposal. An initial recommendation not to fund was, in a number of cases, reversed after additional information was received and/or a proposal was refined to make it stronger and in line with the High Growth principles.

9. There was no conflict of interest, but better documentation can occur.

ETA emphatically asserts that there was no conflict of interest by any staff participating in the review process and the mere lack of a certification is not an indicator of any conflict existing. However, ETA acknowledges the lack of conflict of interest certifications for non-PRB reviewed awards, and is remedying that process. ETA will develop and implement a process to ensure that potential conflicts of interest or lack thereof by recommenders and approvers of sole source grant awards are identified and documented in the grant file.

10. ETA acknowledges failure to carry forward matching requirements and has already instituted corrective action.

ETA has already acknowledged the issue of not properly carrying forward match requirements when grants were modified, and corrective action is already in progress. In order to correct this administrative finding, we are developing procedures and formats to address these inconsistencies and appropriate staff training will be provided. ETA will implement procedures to ensure that all grantee commitments to provide leveraged resources or match (either cash or in-kind) are appropriately documented and maintained in the grant file and appropriately accounted for. ETA will ensure that, when applying DLMS 2-836 (G)(5), the activity conducted by the grantee or a partner organization using its own resources or those donated or provided by third parties is fully documented and accounted for and an assessment of cost effectiveness is completed.

While these procedures are being finalized, ETA will immediately implement a policy to ensure that grant officers verify all budget re-alignment modifications contain both pages of the SF 424A and any match requirements are clearly presented prior to approving such a modification. In addition to improving our procedures, ETA is in the process of updating Employment and Training Order No. 1-03 and will undergo an internal procurement review in the near future.

Response to Specific Recommendations:

1. Competition is encouraged when awarding discretionary grants.

As stated previously in the response, ETA agrees that competition is to be encouraged where appropriate and has actively used competition as the vehicle for awarding High Growth grants.

2. Policy is established for documenting all decisions and discussions that lead to actions by departmental officials that affect how and to whom grant funds are distributed.

ETA has provided specific action steps in the body of the response related to this recommendation and agrees that additional documentation of the processes related to awarding non-competitive grants is desirable and will take steps to do so.

3. Any future non-competitive awards are properly justified and based on appropriate DLMS exceptions.

ETA disagrees that any prior non-competitive awards were not justified and based on appropriate DLMS exceptions, but agrees that any future ones will also be made in accordance with all procurement requirements.

4. Decisions to exempt proposals from PRB review are properly researched, valid, and documented.

ETA asserts that prior decisions have been properly researched and were valid, but agrees that additional documentation is helpful.

5. Agency officials are fully trained and aware of the procurement procedures for non-competitive awards, including documenting the decision-making process.

ETA currently has a well-trained staff related to procurement procedures. However, to strengthen staff capacity and to implement enhanced documentation processes, ETA will develop and distribute a guide for procurements, including non-competitive awards, to assist agency officials. This guide will include current agency policy.

Attachment

High Growth Job Training Initiative

Evolution of the High Growth Job Training Initiative

The Department of Labor's (DOL) High Growth Job Training Initiative (HGJTI) is a systemic change initiative designed to propel the workforce investment system to become demand-driven and to approach workforce development more strategically by engaging business and industry, education partners, and others to collectively define the workforce challenges in the 21st century economy and to develop solutions to those challenges – solutions that leverage a wide array of resources among the partners.

Investments in model workforce solutions under the HGJTI have been part of a much larger strategic process that has grown and evolved as a result of learning gained and an ever changing economy. The HGJTI began with a tiered approach that included several key steps prior to making financial investments. Each phase built on the next, offering a systematic approach to developing solutions to workforce challenges defined by business and industry.

- **Identification of high growth, high demand industries.** Given that the HGJTI was designed to model how state and local partners could become more demand driven by identifying the high growth, high demand industries in their economies, it was never DOL's intent to identify all high growth industry sectors in the economy. Rather – to provide a framework for the process to be used at the state and local levels, we strategically chose industries that represent a variety of different sectors of the economy and all have significant demand for workers. Industries fell into four categories for inclusion as high growth, high demand: 1) industries that are truly high growth, such as health care and financial services; 2) industries that are transforming as a result of technology and innovation, such as advanced manufacturing; 3) emerging industry sectors such as biotechnology and geospatial technology; and, 4) those that are critical to the foundation of any economy such as energy and transportation. We began the process with advanced manufacturing and healthcare and gradually added additional industries or sectors based on these criteria.
- **Industry Scans.** Before reaching out to industry leaders and stakeholders, DOL completed a scan of the size, trends, and scope of each industry as well as any already identified workforce challenges in order to better prepare for dialogues on their workforce needs and challenges. The industry scans became the foundation for more complete published reports on each industry following the completion of the industry executive forums and workforce solutions forums discussed below.
- **Industry Executive Forums.** With a better understanding of the context of the industry overall, the next phase of the process involved convening industry executives at the CEO level, often with the help of industry trade associations, to hear about the growth potential of their industries and to understand workforce challenges critical to continued growth. This phase of the process was important for four reasons. First, it was the opportunity to learn directly from industry; second, it was an opportunity to set the stage for ongoing business engagement and strategic partnerships; third, it allowed us to identify where the private sector was already working on solutions; and fourth, it allowed us to validate and expand our industry scan information to help inform the next phases of our work. During this phase, DOL conducted 37 Executive Forums with industry leaders across each of the

industry sectors, reaching 815 industry partners through the process.

- Workforce Solutions Forums. With a solid understanding of the workforce challenges in each industry, DOL then hosted a series of Workforce Solutions Forums. These forums again brought together high-level executives, often those engaged in companies' human resources and training activities, with representatives from education, labor, and the public workforce system. Participants were identified as those leading the nation in developing new workforce approaches for each industry sector. The primary outcome from these forums was a set of industry-driven solutions for each industry, which were compiled and added to the overall industry summary reports. In total, DOL conducted 15 Workforce Solutions Forums, reaching 627 strategic partners.
- Investments in Workforce Solutions Addressing Industry Identified Challenges. One of the outcomes of the executive and solutions forums and our general focus on an industry sector was the receipt of many unsolicited proposals. DOL reviewed these proposals with an intent to choose for funding those proposals that were innovative; responded directly to the issue areas defined by industry; represented strategic partnerships that included business and industry, education, labor as appropriate, and the public workforce system; and, in many cases, leveraged both public and private funding from other sources. In carrying out this mission, the Department awarded grants to model programs using discretionary funding for this activity as authorized under title I of the Workforce Investment Act, and starting in mid-2005, utilizing H-1B Nonimmigrant Petitioner fees under the amended American Competitiveness and Workforce Development Act of 1998. The Department made sole source awards consistent with the Department's policies and procedures governing non-competitive awards and Federal procurement rules.

More specifically, sole source grants were reviewed and approved by the Department's Procurement Review Board, which rigorously screens proposals in accordance with Federal procurement policies (DLMS 2-836). Proposals were presented for review under the required criteria of [DLMS 2- 836 (g)(3)] where *services are available from only one responsible source and no substitute will suffice; or the recipient has unique qualifications to perform the type of activity to be funded; [DLMS 2- 836 (g)(4)] the project is unique or innovative and has outstanding merit; or [DLMS 2- 836 (g)(5)] the activity will be conducted by an organization using its own resources or those donated or provided by third parties, and DOL support of the activity would be highly cost effective.*

As the initiative began to mature, additional steps were needed to ensure our investment strategy was achieving our goals of a demand-driven workforce investment system and a more competitive workforce that meets the needs of business. To that end, the following additional strategies have been implemented.

- Follow-on competitive funding opportunities in targeted industry sectors as incentive to continue driving the demand-driven vision. It was DOL's intent from the early phases of the HGJTI to move to a competitive investment model in order to incent the workforce investment system and other strategic partners to use this model to drive demand-driven, innovative workforce solutions at the state and local levels. DOL completed the majority of its initial round of investments in most of the industry sectors by PY 2005. During that year, DOL focused on supporting the success of grantees to date and preparing for our second competitive solicitation in Advanced Manufacturing.

- Dissemination strategies for HGJTI Products. DOL has been committed to strategies designed to disseminate the innovative approaches, tools, and products developed as a result of HGJTI investments since the beginning. Below are key strategies:
 - Workforce³ One (www.workforce3one.org), ETA's Web based, interactive learning and knowledge sharing network, offers the public workforce system, employers, economic development professionals, labor leaders, and education professionals access to a wide array of learning opportunities and is the central repository for HGJTI products. In addition to direct access to the products, Workforce³ One hosts webinars, podcasts, and electronic newsletters featuring both HGJTI achievements and those developed with Community Based Job Training Grants, as well as other state or locally funded demand-driven approaches.
 - Partnership with League for Innovation in Community Colleges (League) and American Association of Community Colleges (AACC): DOL is working in close partnership with the League to distribute product CDs to 1,900 community colleges nationwide and the public workforce system to ensure broad dissemination of HGJTI products for replication. Examples of products include competency models, curriculum, course materials, career ladders, career guidance, and replication guides, and will be available on Workforce3 One for download by the over 18,000 registrants. In addition, the League and AACC are supporting efforts to promote products through their on-line resources and annual conferences.
 - Workforce Innovations Conference: DOL, in partnership with the American Society for Training & Development (ASTD), sponsors an annual conference at which more than 3,000 local, state and national workforce professionals have the opportunity to talk directly to grantees in workshops to gain first hand experience in replicating demand-driven strategies. In 2007, each conference participant will receive a CD set with over 125 products across all of the high growth, high demand industries.
 - Private Sector Promotion of Products: In addition to the avenues listed above, DOL receives frequent requests to share and promote these industry-driven products and tools from a myriad of industry associations and national organizations.
- Strategies for Assessing Outcomes and Performance. Below are the key strategies DOL has implemented related to tracking outcomes and performance for HGJTI grants:
 - All grantees are reporting on the number of individuals trained through the grants. Through the \$285.5 million investment, the HGJTI is expected to train over 130,000 participants under the grants awarded to date. (In comparison, 189,000 individuals completed training through the workforce investment system last year, with an investment of about \$4 billion.)
 - The Department has also been taking steps to collect the common performance

measures fully aligned with those required under the Workforce Investment Act on individuals participating in training.

- For grants that include capacity-building strategies to improve capacity to train and educate in high growth, high demand industries, grantees are required to track and report the impact of all capacity building products, models, and activities.
 - ETA is conducting a two phase evaluation of the HGJTI. The first component of the evaluation focuses on implementation and sustainability for 20 early HGJTI grants with a final report to be completed in 2007. The second component of the evaluation is a quasi-experimental analysis of the early impacts of training provided by six HGJTI grantees, using program data on trainees and state administrative data on employment and earnings. The goal is to evaluate the effects HGJTI grant-funded training has on worker employment and earnings and the final evaluation report is anticipated in early 2008.
 - DOL continuously collects anecdotal information on the adoption of demand-driven strategies by state and local areas. A number of states and local workforce investment boards have adopted and implemented demand-driven industry strategies that have informed the use of their Workforce Investment Act formula dollars including California, Texas, Pennsylvania, and local areas boards such as Southwest Connecticut, Houston, and Lancaster, PA.
- Ongoing industry engagement strategies. DOL continues to remain actively engaged with industry partners to advance understanding of the skill sets and competencies that are essential to educate, train and employ a globally competitive workforce. In each of our high growth industries, we have been working closely with business leaders to create comprehensive and readily accessible documentation of the skills and competencies required in a variety of high growth, high demand industries, which is used by educators and trainers to get workers the skills they need to succeed in the workplace.

In addition, DOL is working to develop cross-industry strategies to workforce challenges. For example, the shortage of skilled craftsmen and utility workers is a key challenge for the U.S. energy industry. DOL and its partners, including representatives from the energy industry and the construction firms and labor management organizations that support it, are embarking on an initiative to improve the pipeline of craftsmen and utility workers who can build, maintain, and operate the growing energy infrastructure.

DOL has now recognized the need to not only connect workforce development with education and industry leaders, but also to integrate it with economic development in the context of regional economies. The WIRED (Workforce Innovation in Regional Economic Development) initiative and framework builds on the demand-driven concepts in the HGJTI and is further leveraging those investments in new ways. DOL is now encouraging regional economies to clearly identify the industry sectors that will make them competitive and grow their economy and to focus on the talent development strategies that are key to ensure that workers have the skills they need to prosper in the global economy and that businesses have workers with the skills that will help them be competitive.

- **Cross-cutting Industry Strategies:** Through the HGJTI, DOL has identified a number of cross-cutting strategies that will help ensure a competitive U.S. workforce. In an increasingly global, knowledge-driven society, science, technology, engineering and math (STEM) education and development are critical to our economic competitiveness and growth as a nation. DOL intends to issue a competitive SGA for STEM talent development strategies that attract and prepare workers for STEM careers, including creating an alternative pathway for out-of-school youth. In addition, under the HGJTI, DOL recognized the need for new and alternative approaches to training workers, and plans to implement a competitive investment focused on innovative technology-based and remote learning strategies designed to provide training in real time and to promote increased access to educational opportunities for all workers.

The strategies discussed above continue to expand and evolve. The value of the HGJTI investments are continuing to be identified and leveraged in new ways.

High Growth Awards

There are a total of 150 HGJTI grants amounting to \$285,516,990. These investments leveraged almost \$335,000,000 in resources contributed by partners. 127 of these grants, totaling \$256,670,191, were awarded on a sole source basis after approval from the Department of Labor's Procurement Review Board.

23 High Growth grants were awarded on a competitive basis for \$28,846,799:

- **Health Care/Biotechnology** - In June 2005, under the High Growth Healthcare/Biotech Solicitation for Grant Applications (SGA), the Department reviewed close to 230 applications and awarded 12 grants totaling \$12,032,302.
- **Advanced Manufacturing** - In October 2006, the Department announced the award of \$16.8 million in grants to 11 organizations in 10 states to prepare workers for careers in advanced manufacturing. The 11 organizations were selected from among the 186 applicants competing for funding.
- **Health Care:** - In February 2007, the Department announced a grant competition for approximately \$3 million to be invested in training for the healthcare industry's long-term care sector. Grants awards were announced in June 2007.

Current and future competitions include:

- **Energy/Construction** - In the Fall 2007, the Department anticipates a grant competition for approximately \$10 million to be invested in training and capacity building in the energy and construction industries. This competition follows an Energy Skilled Trades Summit held in August 2007.
- **Science, Technology, Engineering and Math (STEM)** - In the Fall 2007, the Department anticipates a grant competition for approximately \$10 million for STEM talent development strategies that attract and prepare workers for STEM careers, including creating an alternative pathway for out-of-school youth.

Grant Recipients

Grants under the HGJTI have been awarded to a wide range of organizations as follows:

- 45 to public workforce investment system organizations, including Workforce Investment Boards, One-Stop Career Centers, and state/local workforce agencies;
- 36 to employers, industry associations and labor/management organizations (2 were awarded directly to unions and 5 grants have unions as partners);
- 48 to community colleges and educational institutions representing the continuum of education; and
- 21 to community-based organizations.

High Growth Job Training Initiative Training Summary Overview

Of the 130,767 individuals projected to be trained under the HGJTI, 89% are currently enrolled in or completed training.

Total Projected Trained	130,767
Total Trained as of March 29, 2007	61,186
Total Enrolled as of March 29, 2007	55,588
Total Trained + Enrolled	116,774