



November 22, 2024

MEMORANDUM FOR: JOSÉ JAVIER RODRÍGUEZ  
Assistant Secretary  
for Employment and Training

A handwritten signature in cursive script that reads "Carolyn R. Hantz".

FROM: CAROLYN R. HANTZ  
Assistant Inspector General  
for Audit

SUBJECT: Job Corps Needs to Revise How it Measures and  
Reports on its Activities Supporting the President's  
National Drug Control Strategy,  
Report No. 03-25-001-03-370

This memorandum presents the results of the U.S. Department of Labor (DOL) Office of Inspector General's audit of the Job Corps program's measuring and reporting of its drug control activities<sup>1</sup> that support the President's National Drug Control Strategy (President's Strategy). Since 1999, drug overdoses have killed more than 1 million Americans, with over 100,000 overdose deaths occurring in 2021. The President's Strategy, released by President Biden in 2022, is a plan to address addiction and the overdose epidemic in the United States. The Office of National Drug Control Policy (ONDCP) is responsible for implementation of the President's Strategy across the federal government, coordinating across 19 federal agencies—including DOL—and overseeing an approximately \$44 billion budget as part of a whole-of-government approach to addressing addiction and the overdose epidemic.

Each year, ONDCP is required to publish the National Drug Control Assessment, an update of the 19 federal agencies' progress in achieving the President's Strategy's goals and objectives.<sup>2</sup> The assessment includes information and data submitted by each agency that describe and reflect the performance of its drug control activities.

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<sup>1</sup> With respect to Job Corps, drug control activities refer to activities intended to reduce or prevent the use of drugs.

<sup>2</sup> 21 U.S.C. § 1705(g)(1)

Administered by DOL's Employment and Training Administration, Job Corps is the nation's largest residential education and job training program for underserved youth, ages 16 through 24. Job Corps provides not only education and training but also career counseling and support services for students at more than 120 Job Corps centers.

In Program Year 2022, six Job Corps students died of suspected unintentional drug overdoses, including three on center. In Fiscal Year (FY) 2023, Job Corps requested \$6 million for drug control activities,<sup>3</sup> comprising \$0.7 million for student drug testing and \$5.3 million for the Trainee Employee Assistance Program (TEAP), its core drug control activity. TEAP provides intervention services designed to help students address their substance use issues, if possible, before starting academic and career technical training coursework in Job Corps. TEAP's general focus is on prevention, education, identification of substance use problems, relapse prevention, and supportive services to enhance students' health, wellbeing, and access to quality employment. To ensure the health and safety of Job Corps' student population and prevent overdose deaths, it is vital that Job Corps' drug control activities are effective in maintaining a drug-free environment.

An ONDCP review of FY 2023 performance data identified three performance measures for which Job Corps reported inconclusive data. ONDCP subsequently requested the Office of Inspector General conduct an audit related to Job Corps' drug control activities and associated performance measures.

In response to ONDCP's request, we initiated a performance audit to determine the following:

Is Job Corps effectively measuring and reporting the performance of its drug control activities in support of the President's Strategy?

We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

To address our objective, we interviewed Job Corps and Office of the Assistant Secretary for Administration and Management<sup>4</sup> officials. We analyzed information related to Job Corps' drug control activities and the performance measures it submitted to ONDCP for FY 2023. We reviewed ONDCP Circulars to gain an understanding of ONDCP's reporting requirements. We also reviewed the 2023 and 2024 National Drug Control Assessments to identify missing or inaccurate data.

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<sup>3</sup> Executive Office of the President, Office of National Drug Control Policy, National Drug Control Strategy: FY 2023 Budget Summary, available at:

<https://www.whitehouse.gov/wp-content/uploads/2023/05/FY-2023-Budget-Summary.pdf>

<sup>4</sup> The Office of the Assistant Secretary for Administration and Management—specifically, the Departmental Budget Center—serves as the liaison between DOL and the Office of National Drug Control Policy.

In planning and performing our audit, we considered Job Corps' internal controls relevant to our audit objectives by obtaining an understanding of those controls and assessing control risks for achieving our objectives. The objective of our audit was not to provide assurance of the internal controls; therefore, we did not express an opinion on Job Corps' internal controls. Our consideration of internal controls for measuring and reporting on Job Corp's drug control activities would not necessarily disclose all matters that may be significant deficiencies. Because of the inherent limitations on internal controls, or misstatements, noncompliance may occur and not be detected.

## **Results**

While we found Job Corps' drug control activities support the President's Strategy, Job Corps is not effectively measuring and reporting the performance of those activities as required by ONDCP. First, Job Corps has not developed or identified performance measures that accurately reflect the performance of its activities supporting the President's Strategy with respect to TEAP. Second, Job Corps reported untimely data to ONDCP. Third, Job Corps did not establish targets for three of its four current performance measures. As a result, Job Corps cannot demonstrate the effectiveness of its drug control activities nor the extent of its contributions to the President's Strategy and the overall goal of reducing and preventing drug use and overdose deaths.

In addition to our findings, we also noticed the 2023 and 2024 National Drug Control Assessments contained inaccurate Job Corps information and data.

### **Finding One: Job Corps Did Not Develop or Identify Performance Measures to Evaluate TEAP Effectiveness**

We found Job Corps did not have any performance measure for its core drug control activity, TEAP. As such, Job Corps also did not comply with ONDCP's criteria for evaluating the performance of its drug control activities. This occurred because Job Corps relied on its mandated Workforce Innovation and Opportunity Act performance measures, which report overall program outcomes, rather than developing or identifying appropriate measures to evaluate the specific performance of TEAP. Without establishing a performance measure for TEAP, Job Corps cannot demonstrate the effectiveness of its drug prevention and intervention efforts in support of its own mission or the extent to which these efforts assist the President's Strategy.

For the National Drug Control Assessment, ONDCP requires agencies to submit an evaluation of their progress toward achieving specific goals in the President's Strategy. In doing so, each agency must include a chart that displays performance measures (targets and results) demonstrating "how the programs, projects, or activities described

in [the evaluation] contributed towards achieving the goals, objectives, and targets of the Strategy.”<sup>5</sup>

The 2024 National Drug Control Assessment identified two goals with three total objectives that Job Corps supported through its drug control activities in FY 2023:

**Goal 1.** Illicit substance use is reduced in the United States.

**Objective 1:** The number of drug overdose deaths is reduced by 13 percent by 2025.

**Objective 2:** The percentage of people meeting criteria for cocaine, opioid, and methamphetamine use disorders are each respectively reduced by 25 percent by 2025.

**Goal 5.** Recovery efforts are increased in the United States.

**Objective 2:** The number of peer-led recovery community organizations is increased by 25 percent by 2025.

According to the evaluation Job Corps provided for the 2024 National Drug Control Assessment, it supported these goals and objectives with the following drug control activities:

**Illicit substance use is reduced in the United States (Goal 1, Objectives 1 and 2)**

- educating students on its policy of prohibiting controlled substance use as a condition of enrollment;
- educating center staff on how to respond to an opioid overdose and administer Narcan if needed;
- drug testing all students and screening them to identify potential opioid and methamphetamine use;
- providing intervention services for students who initially test positive for drugs and ongoing relapse prevention support; and

**Recovery efforts are increased in the United States (Goal 5, Objective 2)**

- through Job Corps’ TEAP, incorporating student-supported peer recovery efforts both on- and off-center.

In the 2024 National Drug Control Assessment, Job Corps also provided four performance measures to demonstrate how its drug control activities reported above contributed to achieving the goals and objectives in the President’s Strategy:

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<sup>5</sup> Executive Office of the President, Office of National Drug Control Policy, ONDCP Circular: National Drug Control Assessment (September 9, 2021), available at: <https://www.whitehouse.gov/wp-content/uploads/2023/03/ONDCP-Circular-National-Drug-Control-Assessment.pdf>

1. Drug Testing, Percentage of students tested for drugs upon entry;
2. Number of people served;
3. Employment Rate, 2<sup>nd</sup> quarter after exit; and
4. Employment Rate, 4<sup>th</sup> quarter after exit.

Job Corps policy requires it to test every student upon entry,<sup>6</sup> so the first measure relates to its drug testing program. According to Job Corps, the second measure represents the number of students who were drug tested throughout the fiscal year although this was not clearly noted in the National Drug Control Assessment. The other two measures are Workforce Innovation and Opportunity Act-mandated outcome measures that demonstrate overall program success. Job Corps did not establish or submit any measures specific to TEAP—the core drug control activity with which Job Corps supported each of its selected goals and objectives in the 2023 National Drug Control Assessment.

Job Corps officials stated the program’s “mandate comes from [the Workforce Innovation and Opportunity Act] and its performance outcomes. Job Corps is not a drug treatment program and therefore does not have any specific performance measures that can be tied to drug control activities.”

While Job Corps’ primary focus is not drug treatment, it has invested significant resources—\$5.3 million, or 88 percent of its drug control budget in FY 2023—into TEAP’s drug education, prevention, and intervention services. These services are vital to Job Corps’ efforts in maintaining a drug-free learning environment for students while also supporting the President’s Strategy. Additionally, in serving underserved youth, Job Corps is on the front lines with an ability to help reduce overdose deaths.

As such, Job Corps management could use available data to determine if TEAP is operating effectively by helping students and contributing to the President’s Strategy. For example, TEAP provides intervention services and ongoing relapse prevention support for students who initially test positive for drugs. One way that Job Corps could consider measuring the effectiveness of these services and support would be by reporting the percent of students who test negative on their follow-up drug test. Job Corps has access to data on drug test results as reported on by the Government Accountability Office in 2023.<sup>7</sup> Further, as these activities support Goal 1, Objective 2 of the President’s Strategy—to reduce cocaine, opioid, and methamphetamine use disorders—Job Corps could further examine the data to measure the percent of students who test negative on follow-up after initially testing positive for these specific drugs.

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<sup>6</sup> Job Corps Policy and Requirements Handbook (February 14, 2024), Chapter 2.3, R5.g.1.(a)(1)

<sup>7</sup> Government Accountability Office, Job Corps: DOL Could Improve Center Safety and Security Procedures and Assess Hiring Flexibilities for Drug Intervention Specialist, GAO-23-105589 (July 2023), available at: <https://www.gao.gov/assets/gao-23-105589.pdf>

Reviewing such data and establishing relevant performance measures for the National Drug Control Assessment would be useful for determining TEAP's effectiveness in reducing student drug use and its contributions to the President's Strategy. This would also allow management to better identify program weaknesses and develop specific strategies to strengthen TEAP's overall programmatic success.

### **Finding Two: Job Corps Reported Untimely Data**

We also found Job Corps reported untimely data to ONDCP for the 2024 National Drug Control Assessment. This occurred because Job Corps chose to report two performance measures for which it knew it could not submit the supporting data before ONDCP's statutory due date. Untimely data submission may hinder the overall assessment process and inhibit stakeholders' ability to assess DOL's efforts towards meeting the goals and objectives of the President's Strategy.

Job Corps was over 5 months late in submitting two performance measures (Employment Rate, 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit) to ONDCP. ONDCP requires agencies to submit data and other information for the following year's assessment by November 1 of the previous year.<sup>8</sup> For the 2024 National Drug Control Assessment, Job Corps did not submit the results for these two measures until April 8<sup>th</sup>, 2024.

Job Corps officials stated they are unable to obtain the necessary data to calculate these employment measures before ONDCP's statutory due date because the data does not become available until 70–90 days after the close of a quarter. Because of this, it will not be able to improve the data collection and reporting schedule to submit timely data to ONDCP for these measures in the future. Further, they noted Job Corps provided explanations for the delay in footnotes or comments to ONDCP and these delays were never flagged as problematic. Moving forward, Job Corps indicated it will submit the data to ONDCP as soon as it becomes available rather than waiting for a request to be made for the data.

Although Job Corps selected these measures and knew it could not produce the data timely, it did not coordinate with ONDCP to develop a plan of accommodation to ensure the National Drug Control Assessment process was not delayed or hindered by late data submission for these measures.

Job Corps' untimely submission can hinder stakeholders' ability to assess DOL's progress in supporting the President's Strategy. Policymakers need timely data to make informed decisions and effectively allocate resources to help address the addiction and overdose epidemic.

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<sup>8</sup> 21 U.S.C. § 1705(g)(2); Executive Office of the President, Office of National Drug Control Policy, ONDCP Circular: National Drug Control Assessment (September 9, 2021), available at: <https://www.whitehouse.gov/wp-content/uploads/2023/03/ONDCP-Circular-National-Drug-Control-Assessment.pdf>

### **Finding Three: Job Corps Did Not Establish Targets for Three Performance Measures**

Further, Job Corps did not establish targets for three of the four performance measures it reported to ONDCP. For two measures, Job Corps relied on a practice that caused it to forgo establishing a target when it determined historical data was insufficient. For the third measure, Job Corps decided not to establish a target because management did not find it useful. Failure to establish targets for performance measures removes a benchmark to hold Job Corps accountable for its performance and does not comply with ONDCP's requirements.

Job Corps did not establish targets for Employment Rate, 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit performance measures for FY 2022 and FY 2023.<sup>9</sup> This occurred because Job Corps did not have a process in place to establish adjusted targets when it determined historical data was insufficient. According to Job Corps, "the data from FY 2020 and FY 2021 are skewed due to the COVID-19 pandemic and – because it did not reflect real program performance under normal operating conditions – was determined to be insufficient for establishing reasonable targets for the two employment rate measures." Therefore, Job Corps' process for establishing performance targets meant 2 years of skewed data resulted in it being unable to set performance targets for 4 subsequent years. Job Corps expects to be able to establish targets for both employment measures beginning in FY 2025.

In addition to not establishing targets for the two employment performance measures, Job Corps also did not establish a target for the number of people served. Instead, according to Job Corps, it establishes on-board strength targets for each Program Year. Job Corps stated it does not establish a target for the number of people served because "the number of people served in a fiscal year spans program years, includes students who have graduated from the program (and therefore is not reflected in the [on-board strength] number), and includes students in their transition period." Further, Job Corps stated it is not useful to set a target for this measure. However, Job Corps acknowledged that, while it does not establish targets for the number of people served, it is able to provide estimates based on historical data and program trends.

ONDCP requires agencies to submit an evaluation that includes performance measure targets and results.<sup>10</sup> In addition, federal internal control standards require management to compare actual performance to planned or expected results and analyze significant differences.<sup>11</sup>

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<sup>9</sup> Targets for FY 2023, Employment Rate, 2<sup>nd</sup> and 4<sup>th</sup> quarter after exit measures appear in the 2024 National Drug Control Assessment. This reporting was not accurate. See "Observation" section that follows for additional details.

<sup>10</sup> Executive Office of the President, Office of National Drug Control Policy, ONDCP Circular: National Drug Control Assessment (September 9, 2021), available at: <https://www.whitehouse.gov/wp-content/uploads/2023/03/ONDCP-Circular-National-Drug-Control-Assessment.pdf>

<sup>11</sup> Government Accountability Office, Standards for Internal Control in the Federal Government (September 2014), Section 10.03

Failure to establish targets or goals for performance measures makes it difficult to assess and enhance program performance and reduces transparency into the effectiveness of agency operations. Further, it may hinder ONDCP's ability to assess DOL's progress in supporting the President's Strategy to reduce overdose deaths and address addiction in the United States.

### **Observation: Inaccurate Information and Data Published in National Drug Control Assessments**

We also noticed the 2023 and 2024 National Drug Control Assessments contained inaccurate Job Corps information and data.

The 2023 National Drug Control Assessment included a FY 2022 target for the number of people served. Job Corps indicated it did not establish or report a target for the number of people served, and we confirmed that this error occurred after Job Corps' data submission to ONDCP.

In the 2024 National Drug Control Assessment, Job Corps included a footnote stating a target for the number of people served would be established in FY 2025; this was inaccurate information because Job Corps does not establish targets for the number of people served.

Finally, the 2024 National Drug Control Assessment erroneously reflected data submitted in support of FY 2023 results for the 2<sup>nd</sup> and 4<sup>th</sup> quarter Employment Rate as FY 2023 targets. In April 2024, ONDCP had followed up with DOL to request this overdue data, which DOL provided to ONDCP 2 business days later. It appears the late data submission resulted in the data being reported in the wrong column.

We encourage Job Corps to coordinate with the Office of the Secretary for Administration and Management and ONDCP to ensure appropriate review of final content involving its drug control data to prevent inaccurate reporting within future National Drug Control Assessments.

### **Recommendations**

We recommend the Assistant Secretary for Employment and Training:

1. Examine existing Job Corps data regarding its drug control activities to identify appropriate data that aligns with the President's Strategy and the Office of National Drug Control Policy's reporting timelines and identify or develop appropriate and relevant performance measures that demonstrate the effectiveness of its drug control activities as they relate to the President's Strategy.
2. Coordinate with the Office of the Assistant Secretary for Administration and Management and the Office of National Drug Control Policy to establish reporting



timelines for any performance measures that cannot be submitted before the Office of National Drug Control Policy's reporting deadline.

3. Establish targets for all performance measures reported by Job Corps in the National Drug Control Assessment.

### **Analysis of ETA's Comments**

In response to a draft of this memorandum, ETA agreed with our three recommendations to improve how it measures and reports the performance of its drug control activities supporting the President's Strategy. The agency also provided additional information. We reviewed the response in full; our memorandum was accurate as stated and the agency's response did not result in any changes to our reported results or conclusions. A synopsis of ETA's comments and our corresponding responses follows:

#### Recommendations

- ETA agreed with Recommendation 1 and stated that, in consultation with the Office of the Assistant Secretary for Administration and Management, it has identified existing data and performance measures that satisfy Job Corps' reporting requirements and submitted those to ONDCP.
- ETA agreed with Recommendation 2 and stated it has eliminated reporting on measures that would cause significant delays in Job Corps' submission. Further, ETA will continue to work with the Office of the Assistant Secretary for Administration and Management to ensure future submissions meet required deadlines and quality standards.
- ETA agreed with Recommendation 3 and stated it will establish performance targets for all reporting metrics that Job Corps identified in response to Recommendation 1.

#### Additional Information

- ETA expressed concern that the draft memorandum implied Job Corps deliberately knew its data would hinder and delay the ONDCP process.
  - To clarify, the draft memorandum did not state Job Corps intended to hinder or delay the ONDCP process nor did the memorandum contain such a conclusion. The memorandum stated Job Corps officials indicated these delays were never flagged as problematic. ETA stated it recognizes the importance of meeting reporting deadlines and has indicated it has already taken and plans to take further corrective action as described under Recommendation 2.

- ETA expressed concern that the draft memorandum insisted Job Corps should have established targets based on COVID-19 data to comply with ONDCP reporting, disregarding that setting WIOA targets has wider implications for the program.
  - The draft memorandum did not state Job Corps needed to establish targets based on skewed data. The memorandum stated that Job Corps reported performance measures without targets because it did not have a process in place to establish adjusted targets when it determined historical data was insufficient. The memorandum concluded that failure to establish targets or goals for performance measures makes it difficult to assess and enhance program performance and reduces transparency into the effectiveness of program operations. As such, we agree that setting performance targets has wider program implications. ETA stated setting clear, measurable targets is essential for assessing program effectiveness and contributions to the President's Strategy and agreed to take corrective action as described under Recommendation 3.

We appreciate the cooperation and courtesies ETA extended to us during the audit and look forward to working with ETA personnel to ensure the intent of the recommendations is addressed.

ETA's full response to our draft memorandum follows.



November 14, 2024

MEMORANDUM FOR:

CAROLYN R. HANTZ  
Assistant Inspector General for Audit

FROM:

JOSÉ JAVIER RODRÍGUEZ 

SUBJECT:

Response to Draft Report – *Job Corps Needs to Revise How it Measures and Reports on its Activities Supporting the President’s National Drug Control Strategy*, Report No. 03-24-XXX-03-370

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The U.S. Department of Labor’s (Department) Employment and Training Administration (ETA) appreciates the opportunity to respond to the above referenced draft report from the Office of Inspector General (OIG). Below are ETA’s observations on the draft report followed by responses to the OIG’s recommendations.

The Job Corps program, administered by ETA, is a comprehensive, primarily residential, academic and career technical training program for eligible youth, ages 16 – 24. There are currently over 120 Job Corps centers nationwide in 50 states, Puerto Rico, and the District of Columbia providing services to more than 36,000 eligible youth each year to help them acquire high school diplomas or equivalencies and occupational credentials leading to careers starting with a job, registered apprenticeship, or entry into the military.

A component of the Job Corps program is the Health and Wellness Trainee Employment Assistance Program (TEAP). TEAP teaches life skills and includes elements for drug prevention and drug education activities as related to job preparation for program participants. TEAP’s drug testing and prevention services are implemented as part of the program’s operational requirements under the Workforce Innovation and Opportunity Act (WIOA), to provide drug testing and implement a zero-tolerance drug policy on Job Corps centers. These program operational requirements, which are complementary to the President’s National Drug Control Strategy, are neither funded, nor designed as part of a standalone drug control strategy.

Nonetheless, ETA is committed to maintaining a safe and drug-free environment for Job Corps students and acknowledges the need to align its programmatic reporting with the national strategies to combat drug use.

### **Areas of Concern with the Draft Report**

#### ***Development of Drug Control-Specific Performance Measures, including TEAP Reporting***

The draft report recommends ETA expand Job Corps’ performance measures to include metrics specifically tied to drug control activities, discusses Job Corps’ “drug control budget,” and claims that Job Corps “has invested significant resources—\$5.3 million, or 88 percent of its drug

control budget” into TEAP, its “core drug control activity.” This mischaracterization of Job Corps’ “drug control activities” and “drug control budget” underpins the OIG’s misconceptions contained in the draft report.

The Job Corps program drug testing and prevention services, including TEAP, are funded through a portion of Job Corps’ operations budget and are implemented as part of the program’s operational requirements under WIOA to provide drug testing, implement a zero-tolerance policy, and ensure a safe and supportive learning environment for Job Corps students. While the Department must comply with the Office of Management and Budget Circular on the National Drug Control Assessment<sup>1</sup> that requires reporting on drug control activities, Job Corps’ TEAP services are neither independently funded, nor structured as a standalone drug control strategy. Instead, Job Corps’ TEAP services are tailored to address the specific needs of Job Corps participants as authorized by statute and within the framework of the program’s broader educational and workforce development mission.

Additionally, one of the central findings in the draft report is the recommendation to establish performance measures for TEAP to better support the goals of the President’s National Drug Control Strategy. TEAP is not designed to yield such data because it serves a specific function within the program relating to drug testing and the zero-tolerance policy; TEAP does not lend itself to specific performance measures or targeted outcomes. Job Corps’ TEAP is a subset of substance use disorder treatment and emphasizes education and support over clinical treatment, helping students manage substance use issues within a structured, supportive environment. A key issue with measuring TEAP’s effectiveness is that the program focuses on individualized outcomes that vary significantly depending on each participant’s background, needs, and goals, making standardized metrics potentially misleading. Research indicates that using outcome-based assessments in addiction treatment often fails to capture the complex, individualized nature of recovery. For instance, recovery indicators such as abstinence at fixed intervals post-treatment are problematic since they do not account for varying life circumstances and often overlook incremental, meaningful progress within each participant’s recovery journey.

Job Corps is working with the Department and the Office of National Drug Control Policy (ONDCP) to reach a mutual understanding on reporting that aligns with Job Corps services and meet ONDCP’s requirements.

### ***Consideration of External Data Inputs for ONDCP Reporting***

The draft report highlights concerns around the timeliness and accuracy of Job Corps’ data submissions to ONDCP. While ETA recognizes the importance of meeting reporting deadlines, the draft report does not fully consider external factors that have historically delayed certain submissions. Specifically, delays in receiving data from external partners and the need for thorough validation processes were contributing factors in past instances of late submissions, and the draft report does not adequately acknowledge the complexities of coordinating multiple data streams in Job Corps. Additionally, the draft report implies that Job Corps deliberately knew that its data would hinder and delay the ONDCP process even though ETA had no indication that this was an issue before the OIG began its audit.

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<sup>1</sup> [ONDCP-Circular-National-Drug-Control-Assessment.pdf \(whitehouse.gov\)](https://www.whitehouse.gov/wp-content/uploads/2017/08/ONDCP-Circular-National-Drug-Control-Assessment.pdf)

Finally, although the OIG acknowledges the challenges in establishing targets based on COVID-19 data, which was a temporary challenge that will no longer affect WIOA target performance, it insists that Job Corps should have done so to comply with ONDCP reporting. The draft report disregards that setting WIOA targets has wider implications for the program given that these targets are used to assess center performance and must be based in accurate, factual data rather than conjecture based on very skewed data during a historic global pandemic. Job Corps also explained to the OIG that it has performance reporting and metrics, unrelated to ONDCP reporting, and in addition to the WIOA requirements, that it used to set reasonable targets for Job Corps centers' performance.

ETA is committed to refining Job Corps' reporting processes to better support the goals of the President's National Drug Control Strategy and to ensure that the performance metrics provide an accurate and timely reflection of Job Corps' contributions.

### **ETA's Responses to the Draft Report's Recommendations**

**Recommendation 1: Examine existing Job Corps data regarding its drug control activities to identify appropriate data that aligns with the President's Strategy and the Office of National Drug Control Policy's reporting timelines and identify or develop appropriate and relevant performance measures that demonstrate the effectiveness of its drug control activities as they relate to the President's Strategy.**

ETA Response: ETA agrees with this recommendation. For Fiscal Year (FY) 2025 and beyond, Job Corps, in consultation with the Departmental Budget Center (DBC), has identified existing data and performance measures that satisfy Job Corps' reporting requirements and submitted those to ONDCP. The Administrator for the Office of Job Corps is responsible for the implementation of this recommendation.

**Recommendation 2: Coordinate with the Office of the Assistant Secretary for Administration and Management and the Office of National Drug Control Policy to establish reporting timelines for any performance measures that cannot be submitted before the Office of National Drug Control Policy's reporting deadline.**

ETA Response: ETA agrees with this recommendation. ETA, in consultation with DBC, has eliminated reporting on measures specifically for the ONDCP report that would cause significant delays in Job Corps' submission. ETA will continue to work closely with the DBC to transmit information to ONDCP to ensure all future submissions meet required deadlines and quality standards. The Administrator for the Office of Job Corps is responsible for the implementation of this recommendation.

**Recommendation 3: Establish targets for all performance measures reported by Job Corps in the National Drug Control Assessment.**

ETA Response: ETA agrees with this recommendation and will establish performance targets for all reporting metrics that Job Corps identified in response to Recommendation 1. Setting clear, measurable targets is essential for assessing the program's effectiveness and its

contributions to the National Drug Control Strategy. For FY 2025 and beyond, Job Corps, in consultation with DBC, has identified existing data and performance measures that satisfy Job Corps' reporting requirements and submitted those to ONDCP. The Administrator for the Office of Job Corps is responsible for the implementation of this recommendation.