



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.