

U.S. Department of Labor

Office of Inspector General—Office of Audit

OFFICE OF JOB CORPS



AUDIT OF CINCINNATI JOB CORPS CENTER'S STUDENT LEAVE AND UNEXCUSED ABSENCES

Date Issued: March 30, 2007

Report Number: 03-07-003-01-370

BRIEFLY...

Highlights of Report Number: 03-07-003-01-370, to the National Director of the Office Job Corps.

WHY READ THE REPORT

OIG conducted an audit to follow up on a previous audit of issues raised in a complaint made against the Management and Training Corporation (MTC), operators of the Cincinnati Job Corps Center (the Center). The Center has a training capacity for 225 students.

The previous audit¹ substantiated that the Center used the Present for Duty Off Center (PDOF) and other leave to extend the students' termination dates beyond their actual departure from the Center and that there was a pattern of excessive unexcused absences. However, the previous audit did not determine the effect of extending the stay of the students, and the audit could not determine if the Center took appropriate action on unexcused absences because the Center destroyed the student Center Standards Office (CSO) file 6 months after the separation date unless the student separated from the Job Corps Program for disciplinary reasons.

WHY OIG DID THE AUDIT

The purpose of our audit was to answer the following questions:

1. To what extent did the Center misuse PDOF and other leave to artificially extend students' length of stay and what was the effect?
2. Did the Center take action to address the behavior of students who had excessive unexcused absences from class?

READ THE FULL REPORT

To view the report, including the scope, methodology, and the National Director of the Office of Job Corps' response, go to:

<http://www.oig.dol.gov/public/reports/oa/2007/03-07-003-01-370>

¹ Complaint Involving the Cincinnati Job Corps Center, September 29, 2006, Audit Report No. 03-06-004-01-370.

March 2007

Audit of Cincinnati Job Corps Center's Student leave and Unexcused Absences

WHAT OIG FOUND

For the period June 1, 2002 through May 31, 2006, the Center put 264 students on the PDOF status at least one or more days during their training. We reviewed the records for 150 of these students who were in PDOF status more than 10 days and determined the Center improperly used the PDOF status to extend the stay for 94 of these students. This occurred because of a weak internal control environment under the previous Center Director. As a result, the Center overstated its on-board strength, which depicts the extent to which the Job Corps centers operate at full capacity and is one of the efficiency measures that Job Corps uses to determine center contractor performance. The Center is subject to liquidated damages totaling \$208,121, because it did not comply with contract requirements prohibiting the artificial extension of students' separation dates.

The Center's process for addressing the behavior of students who had excessive unexcused absences was inconsistent and not effective. This occurred because the Center did not follow its SOP on student attendance and took action that did not correct the students' attendance problem. As a result, the students did not receive the necessary academic and social development during class hours, and excessive unexcused absences could have a negative impact on the students' employability.

WHAT OIG RECOMMENDED

We recommend that the National Director of the Office of Job Corps:

1. assess MTC liquidated damages of \$208,121;
2. require MTC to ensure that the Center follows its SOP in addressing the behavior of students who have excessive unexcused absences; and
3. direct MTC to require that the Center identify the underlying causes that may be unique to non-resident students who have excessive unexcused absences and determine if they need to develop appropriate procedures to address the students' behavior.

In response to the draft report, the Office of Job Corps expressed appreciation for the audit but did not specifically address the recommendations. The response did state that Job Corps is undertaking a review of policies related to performance data to determine if they need to be strengthened and/or clarified.

Table of Contents

	PAGE
EXECUTIVE SUMMARY	3
ASSISTANT INSPECTOR GENERAL'S REPORT	7
The Center Improperly Used Present for Duty Off Center Status and Other Leave to Extend the Stay of 94 Students Who Left the Job Corps Program.....	8
The Center Took Inconsistent and Ineffective Action On Students Who Had Excessive Unexcused Absences	15
EXHIBITS.....	23
A. Duty/Pay/Leave Status Categories	25
B. Differences in Separation Dates and Amount of PDOF Days Questioned	29
C. Examples of Center Extending Students' Separation Dates	33
D. Schedule of Students Tested With Excessive Unexcused Absences	35
APPENDICES	37
A. Background	39
B. Objectives, Scope, Methodology, and Criteria	37
C. Acronyms and Abbreviations	43
D. Agency Response to Draft Report.....	45

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Executive Summary

OIG conducted an audit to follow up on a previous audit¹ of issues raised in a complaint made against the Management and Training Corporation (MTC), operators of the Cincinnati Job Corps Center (the Center). The Center has both residential and non-residential students. The Center's capacity for training is 225 students. This prior audit substantiated that the Center used the Present for Duty Off Center (PDOF) and other leave to extend the students' termination dates beyond their actual departure from the Center and that there was a pattern of excessive unexcused absences. However, the previous audit did not determine the effect of extending the stay of the students, and the audit could not determine if the Center took appropriate action on unexcused absences because the Center destroyed the student Center Standards Office (CSO) file 6 months after the separation date unless the student separates from the Job Corps Program for disciplinary reasons. Therefore, our objectives were to determine:

1. To what extent did the Center misuse PDOF and other leave to artificially extend students' length of stay and what was the effect?
2. Did the Center take action to address the behavior of students who had excessive unexcused absences from class?

Results

The Center Improperly Used Present for Duty Off Center Status and Other Leave to Extend the Stay of 94 Students Who Left the Job Corps Program

From June 1, 2002 through May 31, 2006, over 1,400 students were enrolled at the Center, of whom, 264 were on PDOF status sometime during their training. We reviewed documentation for all 150 students who were on the PDOF status more than 10 days and found that the Center improperly used the PDOF status and/or combinations of various leave categories to extend the separation dates of 94 students beyond their actual departure from the Center. The number of days extended beyond the separation date for the 94 students totaled 2,967. The Center approved the PDOF status for these students for either job search or off Center work-based learning. However, the Center did not have evidence to support that job search or work-based learning actually occurred and that the amount of time in PDOF status was reasonable. This occurred because of a weak internal control environment under the previous Center management which resulted in not following the Center's standard operating procedures (SOP) or the Job Corps Policy Requirements Handbook (PRH), which were designed to ensure the proper use of the PDOF status. We found no improper use of the PDOF status after MTC appointed the current Center Director in May 2004.

¹ Complaint Involving the Cincinnati Job Corps Center, September 29, 2006, Audit Report No. 03-06-004-01-370.

Because the Center extended the students' separation dates beyond their actual departure from the Center, the Center overstated its on-board strength (OBS), which is one of the efficiency measures that Job Corps uses to determine center contractor performance. OBS depicts the extent to which the centers operate at full capacity. Also, the contractor operating the Center is subject to liquidated damages because the Center did not comply with contract requirements prohibiting the use of leave to artificially extend student separation dates. We calculated that the contractor is subject to \$208,121 in liquidated damages.

Center and MTC officials disagreed with our conclusion that the Center is subject to liquidated damages. According to these officials, one of the criteria the audit used to question the PDOF days was the Center's SOP. However, the PRH in effect at the time the questioned PDOF days occurred did not provide a limit on the number of days that could be used. The officials' position is that the PRH takes precedent over the Center's SOP. The officials also told us that although the PRH required student career activity to be documented in the Center Information System (CIS), the Center did not fully implement CIS until 2006. They said the Center was not required to maintain the documentation that may have supported the PDOF days past 3 years.

The Center and MTC officials' positions did not change our conclusion. Concerning the use of the Center's SOP to question the PDOF days, PRH Chapter 5.1, Program Management, required the Center to establish SOPs. The SOPs cited in this report show they were designed to ensure that the PDOF was properly used by limiting the number of days. Concerning the officials' position that they were not required to maintain documentation that may have supported the job search and work-based learning activities past 3 years, 54 of the 94 students for the PDOF days we questioned had separation dates within 3 years of the date (June 21, 2006) when we notified the Center of our audit and when we made our documentation request. The Center did not have documentation to support the job search and work-based learning for these 54 students. This led us to conclude the same situation existed for the remaining 40 students who separated from the Center over 3 years from the date of our audit notification and documentation request

The Center Took Inconsistent and Ineffective Action On Students Who Had Excessive Unexcused Absences

The Center's process for addressing the behavior of students who had excessive unexcused absences was inconsistent and not effective. This occurred because the Center did not follow its SOP on student attendance and took action that did not correct the students' attendance problem. Additionally, Center management told us they attribute multiple unexcused absences as primarily due to the large population of non-resident students. (Of the 37 students tested in our audit, 81 percent were non-resident students). As a result, the students did not receive the necessary academic and social development during class hours, and excessive unexcused absences could have a negative impact on the students' vocational, educational and social development and the students' employability.

Recommendations

We recommend that the National Director of the Office of Job Corps:

1. assess MTC liquidated damages totaling \$208,121;
2. require MTC to ensure that the Center follows its SOP in addressing the behavior of students who have excessive unexcused absences, and document the action taken and results; and
3. direct MTC to require that the Center identify the underlying causes that may be unique to non-resident students who have excessive unexcused absences and determine if they need to develop appropriate procedures to address the students' behavior.

Agency Response

In response to the draft report, the National Director of the Office of Job Corps expressed appreciation for the audit, but did not specifically address the report recommendations.

The National Director stated that Job Corps takes very seriously the need for high data integrity in the program. Having data accurately captured and presented is critical to determining program performance and overall effectiveness. Consequently, the National Director stated that Job Corps is undertaking a targeted review of existing policies to determine if relevant policies need to be strengthened and/or clarified.

See Appendix D for the entire response from the National Director of the Office of Job Corps.

OIG Conclusion

The recommendations in the report will be resolved when the National Director of the Office of Job Corps provides a corrective action plan with milestone dates for addressing the weaknesses found and the corresponding recommendations in this report.

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U.S. Department of Labor

Office of Inspector General
Washington, DC 20210



Assistant Inspector General's Report

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OIG conducted a follow-up audit on a previous audit of issues raised in a complaint made against the Management and Training Corporation (MTC), operators of the Cincinnati Job Corps Center (the Center). The previous audit substantiated that the Center used the Present for Duty Off Center (PDOF) status and other leave to extend students' termination dates beyond their actual departure from the Center and that there was a pattern of excessive unexcused absences. However, the previous audit did not determine the effect of extending the stay of the students, and could not determine if the Center took appropriate action on unexcused absences because the Center destroys the student Center Standards Office (CSO) file 6 months after the separation date unless the student separated from the Job Corps Program for disciplinary reasons. Therefore, our objectives were to determine:

1. To what extent did the Center misuse PDOF and other leave to artificially extend students' length of stay and what was the effect?
2. Did the Center take action to address the behavior of students who had excessive unexcused absences from class?

We conducted our audit in accordance with Government Auditing Standards for performance audits. Our scope, methodology, and criteria are detailed in Appendix B.

Objective 1 – To what extent did the Center misuse PDOF and other leave to artificially extend students' length of stay and what was the effect?

Finding – The Center Improperly Used PDOF Status and Other Leave to Extend the Stay of 94 Students Who Left the Job Corps Program.

From July 1, 2002 through May 31, 2006, over 1,400 students were enrolled at the Center, of whom 264 were on PDOF status sometime during their training. We reviewed documentation for all 150 students who were on Present for Duty Off Center (PDOF) status more than 10 days, and found the Center improperly used the PDOF status and/or combinations of various leave categories to extend the separation dates of 94 students beyond their actual departure from the Center. The number of days extended beyond the separation date for the 94 students totaled 2,967. The Center approved the PDOF status for these students for either job search or off-Center work-based learning. However, the Center did not have evidence to support that job search or work-based learning actually occurred and that the amount of time in PDOF status was reasonable. This occurred because of a weak internal control environment under the previous Center management which resulted in not following the Center's standard operating procedures (SOPs) or the Job Corps Policy Requirements Handbook (PRH), which were designed to ensure the proper use of the PDOF status. We found no improper use of the PDOF status after MTC appointed the current Center Director in May 2004.

Because the Center extended the students' separation dates beyond their actual departure from the Center, the Center overstated its on-board strength (OBS), which is one of the efficiency measures that Job Corps uses to determine center performance. OBS depicts the extent to which the Job Corps centers operate at full capacity, which is 225 students. Also, the contractor operating the Center, MTC, is subject to liquidated damages because the Center did not comply with contract requirements prohibiting the use of leave to artificially extend student separation dates. We calculated that the contractor is subject to \$208,121 in liquidated damages.

According to Job Corps' Policy Requirements Handbook (PRH), Appendix 501a, each Job Corps center has a planned capacity (beds available). OBS is the percentage of capacity utilized on a cumulative basis for the program year. According to MTC's Residential Living Training Manual, OBS is determined by the average number of students who are enrolled in the program compared to the center's contracted enrollment capacity. The manual further states that OBS is affected by the Weekly Termination Rate (WTR). The WTR consists of all students who separate from the program. The PRH, Appendix 501a, shows that Job Corps' goal for OBS for all centers is 100 percent.

The PRH, Chapter 6.1 R2a, Administrative Support, Student Attendance, Leave, and Absences, states that leave shall not be granted as a means of artificially postponing the student's separation date. The PRH, Chapter 6, Administrative Support Exhibit 6-1, defines the duty and leave status categories, the type of allowed leave, and any

limitation on the number of days allowed for the duty and leave status categories. The PRH provides that PDOF is a type of duty status category that can be used for students involved in authorized activities off center such 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.¹

See Exhibit A for a listing and explanation of the duty and leave status categories.

For the 150 students reviewed, 75 percent were on the PDOF status for job search, 17 percent were on PDOF status for work-based learning, and 8 percent were on PDOF status for other purposes such as military, illness, school, etc.

PDOF for Job Search

The Center's Standard Operating Procedures, Section 324.7(b), Job Search Leave Procedures (PDOF), dated May 1, 2002, states: "As part of the Career Development Services System potential graduates are encouraged, during the Career Transition Period, to being actively seeking employment in their field of training. This search may encompass the local area, their home area, or any other geographical area, depending on the potential graduate's willingness to relocate upon completion of the Job Corps program. Eligibility for job search leave is determined by the Retention Committee." The SOP requires the Job Corps Center to:

- limit job search-related PDOF to a maximum of 20 days per 6 months;
- limit initial job search-related PDOF to 5 days and any subsequent leave or leave extension for not more than a combined limit of 10 training days per 6-month period; and
- ensure that, prior to job search, potential graduates have a minimum of three verified job interviews for the week of the scheduled leave.

PDOF for Work-Based Learning

The PRH, Chapter 3.7, dated July 1, 2001, provides that Job Corps centers incorporate work-based learning as a primary instructional method of training and such activities may include job shadowing, internships, and paid and unpaid work assignments. The PRH requires the Job Corps centers to:

- provide work-based learning that involve students in work experiences related to the career field for which they are preparing and occur throughout the student's enrollment;

¹ All PDOF status and leave we are questioning for this audit occurred before May 2004. Unless noted otherwise, the PRH in effect during this period is dated July 1, 2001.

- develop a written agreement with the employer when a student is assigned to a work site;
- monitor all active work-based learning sites; and
- ensure all student work-based learning assignments and progress are documented and recorded using the Center Information System (CIS).

In August 2001, the Job Corps Chicago Regional Office issued a Regional Career Development Services System (CDSS) plan. The CDSS plan was designed so that the Job Corps centers and Career Transition Services staff would pro-actively work with potential graduates on their transition to a career prior to their projected separation date. This was to ensure the successful outcome and to coordinate pre-graduation job searches and arrangement for transition services tailored to the potential graduate's needs.² The CDSS plan required that the Center develop a Personal Career Development Plan (PCDP) for each potential graduate and use the PCDP as a case record to identify all required support service and job or educational goals. The CDSS stated that the Job Corps center Career Development Manager, Counselors, and Career Transition Services staff uses the PCDP to:

- record counseling sessions and progress updates with potential graduates;
- monitor timely initiation of job development;
- provide job search and transition services;
- assist in post-graduate placement;
- obtain employer feedback; and
- provide support service delivery.

Our analysis of data obtained from the Job Corps Data Center covering the period July 1, 2002 through May 31, 2006, identified 264 students whom the Center put on PDOF status 1 or more days. Of these 264 students, we tested 150 who had more than 10 days on PDOF status. Our testing consisted of reviewing all documentation provided by the Center to support the students' PDOF status. See the Methodology Section of this report for details on the type of documentation used in our testing.

For 94 students, the Center used PDOF status to delay reporting students as terminated beyond their actual departure date from the Center. See Exhibit B for a list of the separation dates and amount of PDOF days questioned for the 94 students. We also found incidents in which the Center used PDOF status combined with Unpaid Administrative Leave and Absent Without Leave (AWOL) to delay reporting students as terminated. The purposes that the Center used for putting these students on PDOF status were mostly for job search, job interviews, or work-based learning. We questioned the days these students were on PDOF status because of the following:

² Career Transition Services are provided by contractors responsible for assisting students in job placement and support services after they separate from the Job Corps center.

- For job search, the amount of days exceeded the amount allowed by the SOP and there was no evidence that the student:

had at least three verified job interviews prior to the job search; or

returned to the Center, or telephoned the Center, to discuss the results of the job search activities with the Center Career Development Manager. We assumed that had the job search occurred, there should have been documentation showing the results of the job search activities.

- For work-based learning, there was no evidence of:

a written agreement with the employer; or

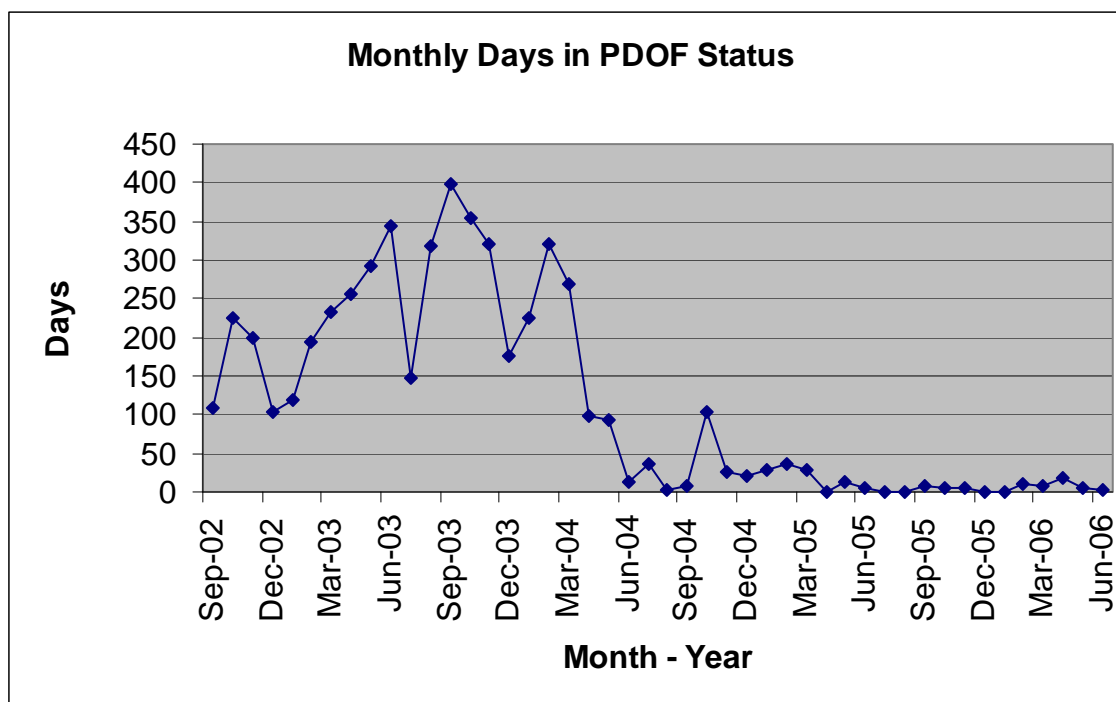
the work-based learning assignments and progress.

We also found evidence of some students' circumstances that demonstrated the student no longer wanted to be in the program, but the Center put the students on the PDOF status. We considered this additional support for our questioning the Center's practice of assigning PDOF status to students. See Exhibit C for examples of where the Center extended students' separation dates by using the PDOF status and other leave.

We could not determine the underlying cause for why the Center management and staff did not comply with the Center's SOP when they assigned PDOF status to students for job search or comply with the PRH when they assigned PDOF status to students for work-based learning. All of the PDOF status days we are questioning occurred before the current Center Director, who was appointed Director in May 2004. Also, the Center staff involved in placing students on PDOF status for the days we are questioning were no longer employed when we started our field work for this audit. Additionally, the Center did not maintain minutes of meetings in which students' retention status was discussed.

We concluded that the control environment was weak under the previous Center Director because she signed most of the PDOF Notification Forms without ensuring that the requirements in the SOP and PRH were followed. Additionally, we found that the monthly use of PDOF status days for the Center dropped significantly starting April 2004 (see chart below). The prior Center Director resigned in February 2004. The current Center Director, assigned in May 2004, reported that he made it very clear that PDOF status should be rarely used and be limited in the number of days. The Center Director said that staff had different interpretations of the PRH criteria for using PDOF which probably led to the situation at the Center before his assignment.

Because PDOF was not misused starting in May 2004, we conclude that no further action is needed to improve the internal controls designed to ensure that PDOF is used properly.



The contract provided for liquidated damages³ for each day we found that the Center artificially extended the students' separation date. In Section G, Item IV of the contract, Liquidated Damages For Failure To Comply With Regulations For Terminating Students, the contractor agreed to refundable costs to the Government for each day a student is retained (counted in the reported on-board-strength) in violation of the PRH requirement that leave shall not be granted as a means of artificially postponing students' separation date⁴. The costs are to be determined by dividing the "annual student cost" ("cost per student year"), as stated in the contract, by 365. If the annual student cost is not stated for any given year, it shall be computed by dividing the total contract amount for the year by the planned average on-board strength.

Using the contract amount and the planned average on-board strength, we determined the refundable costs by dividing the total contract amount for each year by the planned average on-board strength.

We determined that the Center contractor is subject to \$208,121 in liquidated damages. The following table shows the refundable cost for the number of days we determined

³ Liquidated damages are an amount stipulated in the contract which the parties agree is a reasonable estimation of the damages owing to one in the event of a breach by the other.

⁴ The PRH requirement in effect at the time the contract was signed in 1999, was Chapter 4.1. Job Corps moved the requirement to Chapter 6.1 in July 2001, when it revised the PRH.

the student was counted in the reported on-board strength beyond their actual separation date.

Computation of Liquidated Damages				
Time Period by Contract Year in Which the Center Extended the Separation Date	Number of Students	Number of Days Students' Separation Date Was Extended	Daily Rate	Amount of Liquidated Damages
August 2002 through April 2003	32	886	\$ 69.03	\$ 61,161
May 2003 through April 2004	62	2,081	\$ 70.62	\$ 146,960
Total	94	2,967		\$ 208,121

Center and MTC officials disagreed with our conclusion that the Center is subject to liquidated damages. According to these officials, one of the criteria the audit used to question the PDOF days was the Center's SOP. However, the PRH in effect at the time the questioned PDOF days occurred did not provide a limit on the number of days that could be used. The officials' position is that the PRH takes precedent over the Center's SOP. The officials also told us that although the PRH required student career activity to be documented in the Center Information System (CIS), the Center did not fully implement CIS until 2006. They said the Center was not required to maintain the documentation that may have supported the PDOF days past 3 years.

The Center and MTC officials' positions did not change our conclusion. Concerning the use of the Center's SOP to question the PDOF days, PRH Chapter 5.1, Program Management, required the Center to establish SOPs. The SOPs cited in this report showed they were designed to ensure that the PDOF was properly used by limiting the number of days. Concerning the officials' position that they were not required to maintain documentation that may have supported the job search and work-based learning activities past 3 years, 54 of the 94 students for the PDOF days we questioned had separation dates within 3 years of the date (June 21, 2006) when we notified the Center of our audit and when we made our documentation request. The Center did not have documentation to support the job search and work-based learning for these 54 students. This led us to conclude the same situation existed for the remaining 40 students who separated from the Center over 3 years from the date of our audit notification and documentation request.

Recommendation

1. We recommend the National Director of the Office of Job Corps assess MTC liquidated damages totaling \$208,121.

Agency Response

In response to the draft report, the National Director of the Office of Job Corps expressed appreciation for the audit, but did not specifically address the report recommendations.

The National Director stated that Job Corps takes very seriously the need for high data integrity in the program. Having data accurately captured and presented is critical to determining program performance and overall effectiveness. Consequently, the Job Corps is undertaking a targeted review of existing policies to determine if relevant policies need to be strengthened and/or clarified.

OIG Conclusion

The recommendation will be resolved when the National Director of the Office of Job Corps provides a corrective action plan with milestone dates for addressing the assessment of liquidated damages along with planned implementation dates.

Objective 2 – Did The Center Take Action To Address the Behavior of Students Who Had Excessive Unexcused Absences From Class?

Finding –The Center Took Inconsistent and Ineffective Action On Students Who Had Excessive Unexcused Absences.

The Center's process for addressing the behavior of students who had excessive unexcused absences was inconsistent and not effective. This occurred because the Center did not follow its SOP on student attendance and took action that did not correct the students' attendance problem. Additionally, Center management told us they attribute multiple unexcused absences as primarily due to the large population of non-resident students. (Of the 37 students tested in our audit, 81 percent were non-resident students). As a result, the students did not receive the necessary academic and social development during class hours, and excessive unexcused absences could have a negative impact on the students' vocational, educational and social development and the students' employability.

PRH Chapter 3.4, Student Standards and Conduct, Section R2, Rules and Sanctions, dated November 15, 2004, states: "Centers shall develop standards of conduct, including a set of rules and sanctions." PRH Exhibit 3-1, Infraction Levels and Appropriate Center Actions, shows that absent from assigned activity is a Level III infraction and the Job Corps Center action is to sanction the student in accordance with the Center's policy and behavior review panel.

The Center's SOP, Student Attendance Systems, dated May 1, 2002, provides the policy on student attendance. According to the following parts of the SOP, the Center is expected to take action on students who fail to attend classes.

- Paragraph B 1 - Failure to attend classes or walking off the center during class hours is a violation of center rules and regulations and interferes with students' vocational, educational and social development.

- Paragraph B 4 - The center views class attendance as paramount to the students' development in all areas of performance and has established this intolerance for absence policy to reflect this view.
- Paragraph B 5 - Since attendance is an employability issue, it is imperative that our students understand its importance.

Paragraph B 9 and Section C, provides the following steps should be taken to address attendance problems:

- **First Time Offenders:** Students who have five unexcused absences within a 2-week period attend a counseling session.
- **Second Time Offenders:** Students meet with the Attendance Committee and sign a performance contract.
- **Third Time Offenders:** Students meet with the Center Standards Office (CSO).
- **Fourth Time Offenders:** Students are referred to the CSO and then referred to the Center Review Board which may lead to separation.

The Center made minor revisions to the SOP in January 2006. The number of unexcused absences within a 2-week period was increased from 5 to 8. The number of steps to address attendance problems was reduced from four to three.

- **First Time Offenders:** Students received contact and verbal warning by attendance committee when they have 8 unexcused absences within a 2-week period attend a counseling session.
- **Second Time Offenders:** Students meet with the Attendance Committee and sign a performance contract and receive sanctions.
- **Third Time Offenders:** Students are referred to the CSO for fact-finding board and recommendations for separation.

According to the Center Standards Officer (CSO), on the first and third Monday of the month, the Center Records Supervisor initiates a printout listing students absent from training. The information is provided to the Intervention Panel comprised of the CSO, Academic Manager, Vocation Manager, Counseling Staff or Designee, Residential Living Manager (RLM), Programs Director, and Security. Depending on the level of the violations, the Center schedules a meeting with the students who are attendance violators and the appropriate staff.

The Center Director told us he implemented a program to address student behavior including class attendance called the Managers Accessing Panther Pride (MAPP).

When students are placed on the MAPP, they must carry a progress card and obtain the instructor's signature to verify their attendance. The Center holds a weekly MAPP meeting to discuss the student's progress. Students remain on MAPP until they are terminated from the program. If the student's behavior does not improve, the student is referred to the Retention Board which meets to determine if the student should be separated from the program for non-compliance with Center rules.

We examined excessive unexcused absences for any student who had an incident of 5 or more absences⁵ within a 2-week period and for whom these incidents occurred more than 9 times during the student's enrollment at the Center. We reasoned that the student should have changed his or her behavior after going through the multi-step progressive action provided in the Center's SOP.

We obtained the universe of all students who had unexcused absences from class for the period June 1, 2005, through May 31, 2006. We identified for testing those students who had 9 or more incidents of excessive unexcused absences. The number of students totaled 50. We considered these students the worst offenders of the Center's policy on class attendance. Of the 50, counseling records were not available for 13 students because they had been separated for over 6 months at the time we started our audit at the Center. The Center destroys student counseling records 6 months after the student's termination date, unless they separate them for disciplinary reasons. We found that this practice complied with the PRH. Therefore, the Center had counseling records for 37 of the 50 students identified for testing.

Our testing focused on whether the Center followed its SOP on classroom attendance. We also considered any documented action taken by the Center outside of the requirements in the SOP that dealt with addressing the student's classroom attendance problems.

We found that the Center did not follow its SOP for classroom attendance. Most of the action taken by the Center consisted of counseling meetings with the students to discuss class attendance. We also found instances in which the Center placed the students on the MAPP but the students continued to have unexcused absences. There were instances in which the students signed an attendance contract. However, the students signed the contracts as part of the enrollment process instead of at the time when unexcused absences became a problem. Additionally, there were instances where the student was referred to the Center's Fact Finding Board for termination. However, the termination usually occurred after the student accumulated a significant amount of unexcused absences. Overall, we concluded the action taken by the Center was inconsistent and not effective, and students continued to have unexcused absences throughout their enrollment at the Center.

Exhibit D shows the number of incidents of excessive unexcused absences and the total hours for the unexcused absences for the 37 students tested.

⁵ After January 1, 2006, the number of unexcused absences increased to eight and we considered this in our review.

The Center Director told us he has been working with his staff to ensure the SOPs for class attendance are followed and he has seen a decrease in the amount of unexcused absences after our audit period.

Recommendations

We recommend that the National Director of the Office of Job Corps require MTC to ensure that the Center:

2. follow its SOP in addressing the behavior of students who have excessive unexcused absences and document the action taken and results; and
3. identify the underlying causes that may be unique to non-resident students who have excessive unexcused absences and determine if they need to develop appropriate procedures to address the students' behavior.

Agency Response

The National Director of the Office of Job Corps response to the draft report did not specifically address the recommendations related to excessive unexcused absences at the Center.

OIG Conclusion

The recommendations will be resolved when the National Director of the Office of Job Corps provides a corrective action plan with planned milestone dates for addressing the weaknesses and recommendations related to unexcused absences.



Elliot P. Lewis
December 18, 2006

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Exhibits

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EXHIBIT A

Duty/Pay/Leave Status Categories ⁸

Category Type	Purpose	Criteria/Limitation
Present for Duty Off Center (PDOF)	<ul style="list-style-type: none"> • Regional/National competitions or awards. • Work-based Learning. • Vocational Skills Training projects off Center. • Recruiting drives. • Escort Duty. • Out-of-town job interviews. • Apprenticeship jobs. • Armed Forces processing. 	None
Absent Without Leave	Failure to report to Center for morning attendance.	AWOL absence in excess of 6 consecutive training days, or 12 days in a 6-month period, will result in separation from the program.
Administrative Leave Without Pay	<ul style="list-style-type: none"> • Family compassion or hardship. • Court appearance as a defendant. • Pending results of disciplinary fact finding when deemed necessary to remove student from the center. • Elective medical/dental treatment. • When all other leave time is exhausted. 	Not to exceed 30 days per year, unless additional days are approved by the regional office.
Winter/Summer Break	Students are entitled to a scheduled summer break set by the Job Corps National Office.	A break is equivalent to 10 training days. Destination is usually home or alternate destination with limited transportation cost.
Emergency Leave	<ul style="list-style-type: none"> • Death in Family. • Life threatening illness or injury. • Serious illness or injury to student's child. 	Not to exceed 10 training days.
Administrative Leave	<ul style="list-style-type: none"> • Center closure for emergency conditions. • Court appearance. • Securing medical/dental as concurred by Center health staff. • Temporarily housed off Center as a precaution against harm or injury. • Short-term active duty in National Guard. • Other circumstances of an urgent personal nature. 	Not to exceed 10 training days per 6-month period.

⁸ Policy Requirements Handbook - Administrative Support, Exhibit 6-1, July 1, 2001

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Differences in Separation Dates and Amount of PDOF Days Questioned

Student	Separation Date per Center	Separation Date per Audit	PDOF Days Questioned
1	04/14/04	10/14/03	183
2	09/17/03	05/15/03	125
3	09/11/03	06/07/03	96
4	10/08/03	07/14/03	86
5	02/25/04	12/08/03	79
6	02/18/04	12/02/03	78
7	12/10/02	09/25/02	76
8	01/22/04	11/11/03	72
9	11/26/03	09/15/03	72
10	03/20/03	01/13/03	66
11	10/22/03	08/26/03	57
12	10/09/03	08/21/03	49
13	10/09/02	08/22/02	48
14	03/16/04	01/31/04	45
15	10/17/02	09/03/02	44
16	11/06/03	09/25/03	42
17	12/17/03	11/05/03	42
18	05/01/03	03/21/03	41
19	12/17/03	11/06/03	41
20	11/26/02	10/16/02	41
21	06/25/03	05/16/03	40
22	09/30/03	08/22/03	39
23	01/13/04	12/05/03	39
24	02/12/03	01/06/03	37
25	03/05/03	01/27/03	37
26	10/23/02	09/16/02	37
27	11/20/02	10/15/02	36
28	03/24/04	02/17/04	36
29	05/21/03	04/16/03	35
30	10/22/03	09/17/03	35
31	06/11/03	05/09/03	33

Differences in Separation Dates and Amount of PDOF Days Questioned

Student	Separation Date per Center	Separation Date per Audit	PDOF Days Questioned
32	04/17/03	03/18/03	30
33	11/12/03	10/13/03	30
34	10/16/02	09/16/02	30
35	04/09/03	03/10/03	30
36	04/21/03	03/23/03	29
37	09/24/03	08/26/03	29
38	02/11/04	01/13/04	29
39	03/10/04	02/11/04	28
40	03/25/04	02/27/04	27
41	02/25/04	01/29/04	27
42	03/24/04	02/26/04	27
43	06/25/03	05/29/03	27
44	08/20/03	07/25/03	26
45	04/16/03	03/21/03	26
46	03/17/04	02/21/04	25
47	09/30/03	09/06/03	24
48	03/24/04	02/29/04	24
49	06/04/03	05/11/03	24
50	12/03/03	11/10/03	23
51	09/30/03	09/08/03	22
52	03/09/04	02/16/04	22
53	05/28/03	05/06/03	22
54	11/26/02	11/04/02	22
55	02/27/03	02/05/03	22
56	03/10/04	02/18/04	21
57	05/07/03	04/16/03	21
58	05/28/03	05/07/03	21
59	11/12/03	10/22/03	21
60	05/21/03	04/30/03	21
61	10/02/02	09/11/02	21
62	06/11/03	05/22/03	20

Differences in Separation Dates and Amount of PDOF Days Questioned

Student	Separation Date per Center	Separation Date per Audit	PDOF Days Questioned
63	02/20/03	01/31/03	20
64	03/23/04	03/03/04	20
65	11/12/03	10/23/03	20
66	06/04/03	05/16/03	19
67	12/03/03	11/15/03	18
68	10/17/02	09/30/02	17
69	04/23/03	04/07/03	16
70	02/19/04	02/03/04	16
71	08/20/03	08/04/03	16
72	01/21/04	01/05/04	16
73	11/19/03	11/03/03	16
74	08/21/03	08/07/03	14
75	02/11/04	01/28/04	14
76	04/10/03	03/27/03	14
77	06/04/03	05/22/03	13
78	09/24/03	09/11/03	13
79	03/05/03	02/20/03	13
80	09/26/02	09/13/02	13
81	08/20/03	08/08/03	12
82	08/20/03	08/08/03	12
83	03/11/03	02/28/03	11
84	04/28/04	04/18/04	10
85	11/06/02	10/27/02	10
86	02/26/04	02/17/04	9
87	01/29/03	01/21/03	8
88	02/26/04	02/18/04	8
89	06/11/03	06/03/03	8
90	02/12/03	02/05/03	7
91	11/19/03	11/12/03	7
92	01/14/03	01/07/03	7
93	03/25/04	03/18/04	7
94	11/05/03	10/31/03	5

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Examples of Center Extending Students' Separation Date

Example 1

Status per Center	Dates	Days	Auditor Comments
Administrative Leave Without Pay	10/06/2003 to 10/10/2003	5	The comment on Leave Request form showed the student had no job for food, clothing, or shelter. There was a letter dated October 3, from Kelly Services that stated the student accepted employment and will start on October 6.
Present for Duty On Center	10/11/2003 to 10/13/2003	3	Last period the MAC supports the student was on Center.
PDOF	10/14/2003 to 12/16/2003	64	PDOF Notification form showed the student would be on job search from October 14 to 31. There was no evidence to show job search actually occurred. The training classes listed in the Center Training Progress Section of the Student Profile showed work-based for the period October 13, 2003 to April 14, 2004. This conflicted with the job search on the PDOF Notification Form.
Present for Duty On Center	12/17/2003 to 12/17/2003	1	The MAC showed the student on PDOF, not on Center. The Attendance History Roster showed the student had a training related absence for work-based learning.
Winter Break	12/18/2003 to 01/04/2004	18	
Present for Duty On Center	01/05/2004 to 04/14/2004	101	The MAC showed check marks next to the student's name indicating the student was not on Center. One day, January 15, "WBL" was written next to the student's name.
Separation Date	04/14/2004		We concluded that the student was done with the program on October 13. Therefore, the Center extended this student's separation date by 184 days.

Examples of Center Extending Students' Separation Date

Example 2

Status per Center	Dates	Days	Auditor Comments
Present for Duty on Center	05/13/2003 to 05/14/2003	2	The MAC showed the student's last day on Center was May 14. The Student Profile showed the last training course the student took was completed on February 21. The PCDP did not show any additional training activities either on or off Center.
PDOF	05/15/2003 to 05/27/2003	13	PDOF Notification form showed student would be on job search from May 14 to June 30. There was no evidence to show that job search actually occurred.
Present for Duty on Center	05/28/2003	1	The MAC did not show the student on Center.
PDOF	05/19/2003 to 06/25/2003	28	PDOF Notification showed student would be on job search from May 28 to June 26. There was no evidence to support that job search actually occurred.
Summer Break	06/26/2003 to 07/12/2003	17	
Present for Duty on Center	07/13/2003	1	The MAC did not show the student on Center.
PDOF	07/14/2003 to 09/17/2003	66	PDOF Notification showed student would be on job search from July 14 to July 30. There were two handwritten notes on the form extending the PDOF to September 17. There was no evidence to show job search actually occurred or that the student returned or telephoned the Center to discuss the job search results.
Separation Date	09/17/2003		We concluded that the student was done with the program on May 15. Therefore, the Center extended this student's separation date by 125 days.

Examples of Center Extending Students' Separation Date

Example 3

Status per Center	Dates	Days	Auditor Comments
Present for Duty on Center	11/29/2003 to 12/01/2003	3	
Administrative Leave Without Pay	12/02/2003 to 12/14/2003	13	<p>There were AWOL Occurrence Reports for December 2 and 5. On December 5, the student informed the Center she was employed and not returning to the Center. Therefore, we concluded the student was done with the program on December 5, and the Center should have terminated her.</p> <p>By December 5, the student exceeded the maximum allowable AWOL days and the Center put the student on Administrative Leave Without Pay before putting the student on PDOF status until separation. There was no Leave Request form to support the Administrative Leave Without Pay.</p>
PDOF	12/15/2003 to 12/17/2003	3	<p>PDOF Notification form dated December 17 showed the student would be on work-based learning until January 16.</p> <p>There was no evidence to show work-based learning actually occurred.</p>
Winter Break	12/18/2003 to 01/04/2004	18	
PDOF	01/05/2004 to 01/13/2004	9	<p>PDOF Notification form dated January 5 showed the student would be on job search activities.</p> <p>There was no evidence to show job search actually occurred or that the student returned or telephoned the Center to discuss the job search results.</p>
Separation	01/13/2004		<p>We concluded that the student was done with the program on December 5. Therefore, the Center extended this student's separation date by 39 days.</p>

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EXHIBIT D

Schedule of Students Tested With Excessive Unexcused Absences

Student Tested	Incidents of Excessive Unexcused Absences ⁹	Total Number of Unexcused Hours
1	24	585
2	20	403
3	18	472
4	18	307
5	18	257
6	17	475
7	16	390
8	16	321
9	16	321
10	16	306
11	15	353
12	15	210
13	14	404
14	14	348
15	13	336
16	13	217
17	12	256
18	12	199
19	11	323
20	11	308
21	11	175
22	11	152
23	11	151
24	10	213
25	10	210
26	10	160
27	10	139
28	9	325
29	9	199
30	9	188
31	9	167
32	9	158
33	9	142
34	9	140
35	9	138
36	9	122
37	9	103

⁹ Incidents of excessive unexcused absences are defined as 5 or more unexcused absences (8 or more after January 1, 2006) within a 2-week period.

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Appendices

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BACKGROUND

Job Corps is a national program, administered by the U.S. Department of Labor (DOL), Office of Job Corps, which offers a comprehensive array of career development services to at-risk young women and men, ages 16 to 24 to prepare them for successful careers. Job Corps was established by the Economic Opportunity Act of 1964 and is currently authorized under the Workforce Investment Act of 1998, Part 670, Title I. Job Corps' objective is to provide young people with the skills they need to obtain and stay employed, enter the Armed Forces, or enroll in advanced training or further education.

The Cincinnati Center is operated by the Management and Training Corporation (MTC), under contract with Job Corps. The Center has both residential and non-residential students. The Center's capacity (OBS) for training is 225 students. OBS is the percentage of capacity utilized on a cumulative basis for the program year. There were two contracts in effect during the scope of our audit. DOL awarded the first contract to MTC on April 29, 1999. The base contract in the amount of \$10.7 million covered the Center's operational cost for the period of May 1, 1999, through April 30, 2001. The contract contained three option years and the cost of each option year was \$5.5 million, \$5.7 million, and \$5.8 million, respectively. According to the contract, the contractor was to provide training and related support to 225 students. DOL awarded the second contract to MTC on March 16, 2004. The base contract covered the Center's operational cost for the period of May 1, 2004, through April 30, 2006, and totaled \$13.3 million. The contract contained three option years and the cost of each option year was \$6.9 million, \$7 million, and \$7.2 million respectively. According to the contract, the contractor was to provide training and related support to 225 students.

Job Corps uses OBS as an efficiency measure that depicts the extent to which the centers operate at full capacity. OBS is the percentage of capacity utilized on a cumulative basis for the program year. According to MTC's Residential Living Training Manual, OBS is determined by the average number of students that are enrolled in the program compared to the center's contracted enrollment capacity. The manual further states that OBS is affected by the Weekly Termination Rate (WTR). The WTR consists of all students that separate from the program. The PRH, Appendix 501a, shows that Job Corps' goal for OBS for all centers is 100 percent.

In May 2002, Job Corps began implementing performance-based contracts. These contracts tie option years, incentive fees, and bonuses directly to contractor performance. The contract in effect for the period in which we questioned the use of the PDOF status was not a performance-based contract because Job Corps awarded it before May 2002. The subsequent contract awarded in March 2004, was a performance-based contract. The Job Corps Chicago Regional Office was responsible for monitoring the Center's contracted operator.

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OBJECTIVES, SCOPE, METHODOLOGY, AND CRITERIA

Objectives

OIG initiated this audit because of issues identified in a previous audit of allegations raised in a complaint made against MTC, operator of the Center. The previous audit substantiated that the Center used PDOF and other leave to extend the students' separation dates beyond their actual departure from the Center and that there was a pattern of excessive unexcused absences. However, the previous audit did not determine the effect of extending the stay of the students, and the audit could not determine if the Center took appropriate action on unexcused absences because the Center destroys the student Center Standards Office file 6 months after the separation date unless the student separates from the Job Corps Program for disciplinary reasons. Our objectives were to determine:

1. To what extent did the Center misuse PDOF and other leave to artificially extend students' length of stay and what was the effect?
2. Did the Center take action to address the behavior of students who had excessive unexcused absences from class?

Scope

For the use of PDOF leave, our audit covered students at the Center during the period July 1, 2002, through May 31, 2006. For the action taken to address students with excessive unexcused absences from training, our audit covered students enrolled at the Center during the period June 1, 2005, through May 31, 2006. We conducted our audit in accordance with Government Auditing Standards for performance audits. Fieldwork at the Center was conducted August 28, 2006, to December 16, 2006.

Methodology

Present for Duty Off Center (PDOF)

To determine the extent the Center used PDOF status to artificially extend students' length of stay; we obtained the universe of students at the Center during the period July 1, 2002, through May 31, 2006 who were on 1 or more days of PDOF status. During this period, the Center enrolled over 1,400 students. We identified 264 students who were on 1 or more days of PDOF status. Of the 264 students, we selected for testing all students who had more than 10 days in PDOF status. We based our judgmental selection on the Center SOP for using PDOF status that required initial job search leave was for a period of 5 days and any subsequent leave or leave extension for not more than a combined limit of 10 training days per 6-month period. The number of students selected for testing totaled 150.

We interviewed Center management and staff in order to understand the process for putting students on PDOF leave status. Center management consisted of the Center Director, Finance Director, Center Standards Officer, Counselor Manager, and the Career Development Services Manager. We obtained and reviewed the Center's Standard Operating Procedures for the use of PDOF leave for job search and work-based learning. We reviewed the Job Corps Chicago Region's Career Development Services System Plan dated August 2001.

We reviewed several types of documentation provided by the Center to support the students' PDOF leave status. These included:

- Student Profiles (The Student Profile provides a complete history of a student's activities while he/she is at the Center.)
- Center case s
- Present for Duty Off-Center Notification forms
- AWOL Occurrence Records
- Leave Request Forms
- Documents explaining leave
- Travel documents
- Personal Career Development Plan (PCDP). (The PCDP is a case record that Center staff are expected to use to document counseling sessions, progress updates, and job search and transition services for potential graduates.)
- Morning Accountability Count report. (This report shows if the student was at the Center.)

To calculate the amount of liquidated damages the contractor operating the Center was subject to for failing to comply with the contract and Job Corps requirements for terminating students, we determined the refundable cost for each day the students were retained beyond the date when the Center should have terminated them. We calculated the costs per day by dividing total contract amount for each year by 365 days.

Unexcused Absences

We obtained the universe of all students who had at least one unexcused absence from class for the period June 1, 2005 through May 31, 2006. From the universe of 471 students, we used a data base tool to extract all students who had at least one or more incidents of excessive unexcused absences from class. We defined an incident of excessive unexcused absences as when any student had 5 or more absences within a 2-week period (8 or more after January 1, 2006). The number of students totaled 406. From the 406 students who had one or more incidents of excessive unexcused absences, we identified the students who had more than 5 incidents of excessive unexcused absences. The number of students totaled 99. After five incidents, we reasoned that the student should have changed his or her behavior after going through the multi-step progressive actions provided in the Center's SOP. Next, we judgmentally selected for testing all students who had 9 or more incidents of 5 or more unexcused absences within a 2-week period. We considered these the worst offenders of the

Center's policy on class attendance. The number of students totaled 50. Of the 50, counseling records were not available for 13 students because they had separated over 6 months from the time we started our audit at the Center. The Center destroys student counseling records 6 months after the student's termination date, unless they are terminated for disciplinary reasons. We found that this practice complied with the PRH. Therefore, the counseling records were available for 37 of the 50 students identified for testing.

We interviewed Center management and staff to understand the process addressing students who have class attendance problems. Center management consisted of the Center Director, Finance Director, Center Standards Officer, Counselor Manager, and the Career Development Services Manager. We reviewed the PRH and the Center's SOP dealing with classroom attendance.

We performed testing to determine if the Center followed its policy on classroom attendance. The testing included identifying any action taken by the Center with the student that dealt with addressing classroom attendance problems. The Center provided student counseling records and any other documentation dealing with unexcused absences..

We performed data reliability testing. We tested data provided to us by the Job Corps Data Center and the Center by comparing data elements to supporting documentation in the student files maintained by the Center. We followed up and reconciled all differences to ensure we used the actual data. Therefore, we concluded the data we used were sufficiently reliable to meet our objectives.

We did not test the overall internal controls of the Center's Job Corps program or perform a complete audit of the Center's Job Corps program. We only performed the necessary fieldwork and tested controls related to the use of PDOF leave and action taken to address unexcused absences.

Criteria

We used the following criteria to perform our audit.

- Job Corps' Policy Requirements Handbook, July 1, 2001, unless otherwise stated.
- Job Corps Chicago Regional Office Career Development Services System (CDSS) plan August 2001
- Cincinnati Job Corps Center's Standard Operating Procedures, details in report.
- MTC's Residential Living Training Manual.

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ACRONYMS AND ABBREVIATIONS

AWOL	Absent Without Leave
CDSS	Career Development Services System
Center	Cincinnati Job Corps Center
CIS	Center Information System
CSO	Center Standards Office
DOL	Department of Labor
MAC	Morning Accountability Check Report
MAPP	Managers Accessing Panther Pride
MTC	Management and Training Corporation
OBS	Onboard Strength
OIG	Office of Inspector General
PDOF	Present For Duty Off Center
PRH	Policy Requirements Handbook
SOP	Standard Operating Procedures
WTR	Weekly Termination Rate

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AGENCY RESPONSE TO DRAFT REPORT

U.S. Department of Labor

Office of Job Corps
Washington, D.C. 20210



MAR 30 2007

MEMORANDUM FOR: ELLIOT P. LEWIS
Assistant Inspector General for Audit

FROM: ESTHER R. JOHNSON, Ed.D. *Esther R. Johnson*
National Director
Office of Job Corps

SUBJECT: Audit of Cincinnati Job Corps Center's Student Leave
and Unexcused Absences
Report No. 03-07-003-01-370

We have reviewed your draft report pertaining to the audit of the Cincinnati Job Corps Center's Student Leave and Unexcused Absences. That draft report summarized the two prevailing areas that were investigated, and the question of whether the center operators used student codes to improperly extend the stay of students, and whether the center took appropriate actions to address students who had excessive unexcused absences from class.

Job Corps takes very seriously the need for high data integrity in a program such as this. Having data accurately captured and presented is critical to determining program performance and overall effectiveness. As a consequence, we are undertaking a targeted review of our existing policies to determine if the relevant policies need to be strengthened and/or clarified. We will provide you with a timely response on the changes that may be an outgrowth of that review as soon as it is completed. The results of those changes will be reflected in published changes to existing policy.

We appreciate your review and your on-going efforts to help us make Job Corps an even better organization.