



July 2023

JOB CORPS

DOL Could Improve Center Safety and Security Procedures and Assess Hiring Flexibilities for Drug Intervention Specialists

GAO Highlights

Highlights of [GAO-23-105589](#), a report to congressional committees

Why GAO Did This Study

Job Corps centers must ensure federally illegal drugs are not permitted on campus, and are required to test students for drug use within 48 hours of their arrival. Students testing positive must receive intervention services and be retested 37 to 40 days later. A subsequent positive test result is grounds for termination from the program.

GAO was asked to review Job Corps. Among other objectives, GAO examined (1) the extent to which selected Job Corps centers' safety and security protocol documents included minimum requirements, (2) the progress of students testing positive for drug use, and (3) perspectives of staff at selected centers on challenges assisting students.

GAO analyzed program year 2018 (the most recent complete data prior to the COVID-19 pandemic) DOL and contractor data on drug testing and program completion. GAO also selected a nongeneralizable sample of six Job Corps centers to include a range of drug test rates, center sizes, and locations. GAO reviewed current center security protocols, interviewed officials, and distributed a student questionnaire from July through August 2022.

What GAO Recommends

GAO is making three recommendations to DOL including developing procedures for reviewing and approving centers' security protocol documents and assessing actions to help centers recruit and retain drug intervention specialists. DOL agreed with GAO's recommendations.

View [GAO-23-105589](#). For more information, contact John D. Sawyer at (202) 512-7215 or sawyerj@gao.gov or Howard Arp at (202) 512-6722 or arpj@gao.gov.

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JOB CORPS

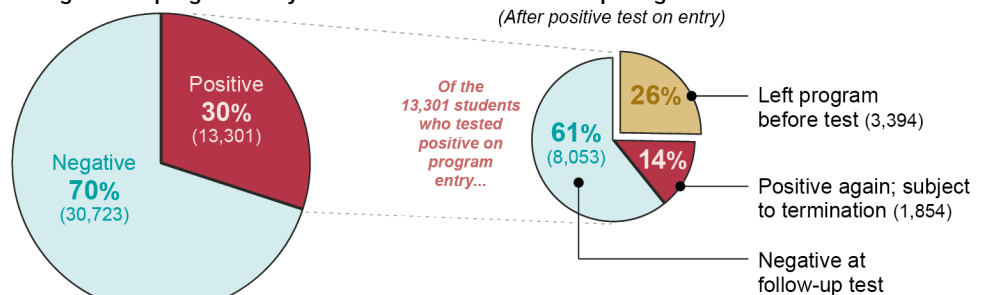
DOL Could Improve Center Safety and Security Procedures and Assess Hiring Flexibilities for Drug Intervention Specialists

What GAO Found

Although four of the six selected Job Corps centers' safety and security protocols GAO reviewed included required elements to prevent illegal drugs from entering their campuses, two centers' protocol documents did not, but were approved by the Department of Labor (DOL). DOL national officials told GAO that they provide guidance on minimum requirements for the protocol documents, and the regions should not approve documents omitting required elements. However, GAO found that the broad guidance lacked the written procedures needed for regional offices to identify missing elements. Without such procedures, regional officials may continue to approve incomplete protocol documents, diminishing centers' efforts to prevent drugs from entering their campuses.

In program year 2018, 30 percent of students tested positive for drug use on program entry, and 61 percent of these students subsequently tested negative during follow-up drug tests, according to GAO's analysis (see figure). About 51 percent of these students completed an educational or technical training credential, compared to about 58 percent of students who tested negative for drug use on entry. After drug tests administered at entry to all students and follow-up drug tests for students testing positive at entry, students are not tested again unless there is reasonable suspicion of drug use.

Drug Test Results for Students Who Enrolled in Job Corps in Program Year 2018



Note: Program year 2018 was July 1, 2018–June 30, 2019

Source: GAO analysis of data from the Department of Labor and its national drug testing lab contractor. | GAO-23-105589

Difficulties recruiting and retaining qualified specialists negatively affect a center's ability to provide intervention services to students who test positive for drugs, according to officials GAO interviewed in five of six selected centers. DOL requires intervention specialists to have a drug abuse counseling certification in the state where the center is located, but allows centers to waive the certification requirement for one year. Some centers used waivers over consecutive years, according to DOL information, indicating prolonged challenges recruiting certified specialists and retaining those hired using a waiver. DOL officials said the agency has not assessed specific options to address these hiring challenges. This would help ensure that centers are positioned to provide intervention services to help students successfully complete the program.

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Abbreviations

CDSS	Career Development Services System
DOL	Department of Labor
DOL OIG	DOL Office of Inspector General
ETA	Employment and Training Administration
SOP	standard operating procedure
THC	tetrahydrocannabinol
TEAP	Trainee Employee Assistance Program
USDA	U.S. Department of Agriculture
WIOA	Workforce Innovation and Opportunity Act

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July 25, 2023

The Honorable Bill Cassidy
Ranking Member
Committee on Health, Education, Labor and Pensions
United States Senate

The Honorable Virginia Foxx
Chairwoman
Committee on Education and the Workforce
House of Representatives

Job Corps is the nation’s largest residential, educational, and career and technical training program for low-income youth generally between the ages of 16 to 24.¹ Job Corps is administered by the Office of Job Corps under the Department of Labor’s (DOL) Employment and Training Administration (ETA). In December 2022, Congress appropriated nearly \$1.8 billion for the Job Corps program. The program enrolls students at 123 centers located in all 50 states, the District of Columbia, and Puerto Rico. Job Corps is designed to help low-income youth obtain the necessary skills to find a job or registered apprenticeship, go to college, or enter military service. Most Job Corps centers (99 of 123 centers or 80 percent) are operated under contracts with various service providers (center operators)—including businesses, Native American tribes, and nonprofit organizations. The remaining 24 centers are operated by the U.S. Department of Agriculture’s (USDA) Forest Service through an interagency agreement.

Prior work by GAO and DOL’s Office of Inspector General (OIG) identified issues with Job Corps student safety, related in part to substance use issues. In June 2018, we reported that drug-related incidents accounted for nearly one-third of all reported safety and security incidents (nearly

¹Job Corps was originally established by the Economic Opportunity Act of 1964. Pub. L. No. 88-452, 78 Stat. 508. Job Corps was most recently reauthorized in 2014 by the Workforce Innovation and Opportunity Act (WIOA). Pub. L. No. 113-128, tit. I, §§ 141-162, 128 Stat. 1425, 1537-60 (2014) (codified at 29 U.S.C. §§ 3191 et seq.). In general, eligible individuals must be age 16 to 21 at the time of enrollment. Additionally, individuals who are ages 22 to 24 at the time of enrollment may participate in the program, although such individuals may comprise no more than 20 percent of Job Corps overall participants. The age limits may be waived by DOL, in accordance with DOL regulations, for individuals with a disability. See 29 U.S.C. § 3194(a)(1)(B).

4,000 of about 13,700) for program year 2016.² In a March 2021 audit, DOL's OIG found that Job Corps center health and wellness managers reported concerns with substance abuse issues among students.³

In 2021, GAO added drug misuse to its high-risk list, as it has been a persistent and long-standing public health issue in the United States.⁴ Further, drug use among American youth, including Job Corps youth, has been a concern over the years. The percentage of Job Corps students testing positive for drug use on program entry increased from 28 percent in program year 2015 to 32 percent in program year 2021.⁵ National Office of Job Corps officials noted that during this same time period, state legalization of marijuana increased in the United States. DOL has acknowledged the adverse effects that drug misuse can have on young people by contributing to poor academic performance, risky behaviors, physical and mental health consequences, and diminished employability.⁶

You asked us to conduct a review of the Job Corps program. This report examines (1) the extent to which selected Job Corps centers' safety and security protocol documents included minimum requirements and followed required protocols to prevent drugs from entering their campuses, (2) what is known about the progress of students who test

²GAO, *Job Corps: DOL Could Enhance Safety and Security at Centers with Consistent Monitoring and Comprehensive Planning*, [GAO-18-482](#) (Washington, D.C.: June 15, 2018). Job Corps is operated on a program year basis, which runs from July 1 of a given year to June 30 of the following year. For example, program year 2016 ran from July 1, 2016 to June 30, 2017.

³DOL OIG, *Job Corps Should Improve Its Pre-Admission Evaluation Process*, 05-21-001-03-370 (Washington, D.C.: March 25, 2021).

⁴Since 2021, GAO has listed national efforts to prevent, respond to, and recover from drug misuse as a high-risk area. See GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: April 2023).

⁵This excludes the time period during program year 2020 when enrollment was paused during the COVID-19 pandemic. Students testing positive for drug use on entry dropped to 24.3 percent for program year 2020. Job Corps reported that COVID-19, center closures, and virtual enrollment greatly impacted entry drug testing statistics during that year. DOL, *Job Corps Health, Wellness, and Disability Report: Review of Selected Health and Disability Indicators Program Year 2021* (Nov. 2022) and *Job Corps Health, Wellness, and Disability Report: Review of Selected Health and Disability Indicators Program Year 2019* (Nov. 2020).

⁶DOL, *Job Corps Health, Wellness, and Disability Report: Review of Selected Health and Disability Indicators Program Year 2019* (Nov. 2020).

positive for drug use in the Job Corps program, (3) what support services Job Corps centers provide students who test positive for drug use, and (4) the perspectives of staff at selected centers about challenges they face in assisting students who test positive for drug use.⁷

To address all of our objectives, we selected six Job Corps centers that included a range of positive drug test rates for students, center sizes, and locations. While our findings from these centers are not generalizable to all Job Corps centers, they provide context and illustrative examples of the kinds of issues Job Corps centers may face. We also reviewed relevant federal laws, regulations, agency policies and procedures, and past GAO and DOL OIG reports concerning safety and security issues at Job Corps centers. We collected feedback from students at each of the selected centers using an anonymous questionnaire. In addition, at each of the selected centers, we interviewed the center director, staff involved in providing intervention services to students testing positive for drugs, and safety and security staff. We also interviewed officials from the national Office of Job Corps and regional office directors covering the regions of the six selected centers in our review.

To address our first objective, we reviewed centers' most current safety and security standard operating procedures (SOPs) and local law enforcement agreements to determine if they included required protocols identified in Job Corps' Policy and Requirements Handbook. In addition, during our audit work in the summer of 2022, our criminal investigators visited the center campuses to observe their entry security practices. We compared these practices with each center's SOP as they pertain to preventing drugs from entering campus. In addition, our criminal investigators obtained and reviewed call logs from law enforcement agencies for the selected centers to identify the extent to which drug-related calls were reported from the centers. Between July and August 2022, we also administered a nongeneralizable anonymous questionnaire of enrolled students at the selected centers to gather their perspectives regarding drug use on campus.

⁷For the purpose of this review, we used the Job Corps definition of prohibited drugs, which includes any substance listed on any schedule of the Controlled Substances Act, except when possessed and used in accordance with a valid prescription. As stated in Job Corps policy, no valid prescription can be provided for Schedule I drugs, including marijuana. We did not include alcohol in the scope of our review.

To address our second objective, we matched data from DOL's lab testing contractor on the results of student drug tests with DOL student data, including data on program completion and safety and security incidents. We analyzed these data for students who enrolled in Job Corps in program year 2018 (July 1, 2018 through June 30, 2019). We selected this time period, in part, to ensure that students had enough time to complete the program before Job Corps sent them home due to the COVID-19 pandemic in March 2020.⁸ We assessed the reliability of the data by reviewing relevant documentation, interviewing knowledgeable officials, and conducting basic electronic testing. We determined these data were sufficiently reliable for the purposes of describing what is known about the progress of students who tested positive for drug use.

For our third objective, we reviewed student health records for a random, nongeneralizable sample of students who tested positive for drug use when they entered the program in program year 2018 at the six selected centers. Our anonymous questionnaire of enrolled students at selected centers also gathered their perspectives regarding intervention services.

Lastly, for our fourth objective, we interviewed DOL and center officials on the challenges they face in assisting students who test positive for drug use. We also reviewed DOL's data collection efforts and interviewed agency officials related to key staffing challenges. We compared this information to leading practices for staff recruitment and retention⁹ and federal internal controls related to quality information.¹⁰ See appendix I for more information on our scope and methodologies.

We conducted this performance audit from January 2022 to July 2023 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. We believe that

⁸Job Corps temporarily suspended operations at its centers on March 16, 2020 due to the COVID-19 pandemic. Most Job Corps students were sent home or to other designated locations. Some centers stayed open to provide housing and meals for students who had nowhere to go.

⁹GAO, *State Department: Additional Actions Needed to Address IT Workforce Challenges*, [GAO-22-105932](#) (Washington, D.C.: July 12, 2022). In this report, we developed leading practices based on our analysis of workforce-related areas and practices identified in federal Office of Personnel Management guidance and our prior work.

¹⁰GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We conducted our related investigative work in accordance with investigation standards prescribed by the Council of the Inspectors General on Integrity and Efficiency.

Background

Job Corps Program Overview

Job Corps offers education and training to help students earn their high school diploma, high school equivalency, or complete career technical training programs in various industries. To be eligible for the Job Corps program, an individual generally must be 16 to 24 years old at the time of enrollment; be considered low-income; and have an additional barrier to education and employment, such as being homeless, not completing high school, or being in foster care.¹¹ Once enrolled, students are assigned to a specific Job Corps center, usually located nearest their home, that offers a job training program of interest. The vast majority of students live at Job Corps centers in a residential setting, while the remaining students commute daily to their respective centers. Residential students may obtain a pass and leave the campus for job training or personal reasons. For example, students may participate in work-based learning at an employment site or obtain a pass for a weekend at home.

Under its residential structure, Job Corps provides a comprehensive array of services, including housing, meals, clothing, academic instruction, and job training. Centers must provide certain recreational activities, such as fitness; and may provide cultural events, dance, and arts. Centers are required to provide health and wellness services, including basic medical services, and must employ full- or part-time physicians, nurses, dentists, and mental health consultants.

Job Corps temporarily suspended operations at its centers on March 16, 2020 due to the COVID-19 pandemic. Nearly 2 months later, Job Corps transitioned all centers to remote learning in order to continue educating and training students. The centers began to reopen for in-person learning in the fall of 2020. According to DOL officials, enrollment declined significantly from about 29,000 at the beginning of the COVID-19

¹¹Under Job Corps policy, the criteria for being considered low-income include receiving certain public assistance or having a total family income that does not exceed, for the 6-month period prior to application, and in relation to family size, the higher of the poverty level or 70 percent of the lower living standard income level. The Department of Health and Human Services publishes annual poverty guidelines and DOL publishes annual lower living standard income levels.

pandemic to around 9,000 by the middle of 2021. Enrollment declined due to suspension of new enrollment as a safety measure against the pandemic and continued separations by the existing students. DOL officials reported that since the fall of 2021, when new enrollment resumed, enrollment steadily increased, and as of May 2023 was roughly 18,000.

Job Corps Structure and Operations

ETA administers Job Corps' 123 centers through its national Office of Job Corps under the leadership of a national director and a field network of six regional offices located in Atlanta, Boston, Chicago, Dallas, Philadelphia, and San Francisco. Job Corps is operated primarily through contracts. Most Job Corps centers are operated under contracts with large and small businesses, nonprofit organizations, and Native American tribes. The remaining centers (called Civilian Conservation Centers) are operated by the USDA's Forest Service through an interagency agreement with DOL.

The Office of Job Corps is responsible for overseeing and monitoring center contractors (operators) to ensure they follow the Job Corps' Policy and Requirements Handbook, including the safety and security provisions. Job Corps regional office staff are largely responsible for monitoring centers' compliance with the handbook, such as through regular and targeted compliance assessments. Job Corps center operators and the USDA Forest Service employ a variety of staff who provide program services to students, including a center director, residential counselors, instructors, safety and security personnel, and health and wellness personnel.

Job Corps Safety and Security

Since 2017, Job Corps has taken several steps to focus on physical security at center campuses, such as enhancing video surveillance and physical access control systems and developing a safety and security strategic plan. In addition, Job Corps added new requirements to the Policy and Requirements Handbook for center operators to establish safety and security SOPs describing how they will regulate access to campuses; handle, secure, and quickly dispose of any illegal drugs confiscated; and record and track illegal drugs; among other safety and security measures.

Job Corps also established minimum required content for centers' agreements with local law enforcement, and required that these agreements—in addition to the safety and security SOPs—be submitted to Job Corps' national and regional offices for approval annually. Centers that are unable to establish an agreement with local law enforcement

must include sections in their SOPs in place of or as a supplement to agreements with local law enforcement to address the Policy and Requirements Handbook requirements.¹²

Job Corps Drug Testing and Intervention

The Policy and Requirements Handbook states that center operators must ensure unauthorized goods (including illegal drugs) are not permitted on center property. The Policy and Requirements Handbook defines illegal drugs as any substance listed on any schedule of the Controlled Substances Act. Job Corps is a federal program, and centers must comply with the federal statute defining illicit substances, regardless of the state laws where the center is located.

Under the Controlled Substances Act, marijuana and the mind-altering chemical it contains—tetrahydrocannabinol (THC)—are classified as Schedule I substances. Schedule I substances are considered to have (1) a high potential for abuse, (2) no currently accepted medical use in treatment in the United States, and (3) no accepted safety for use under medical supervision. Under federal law, unless specifically authorized, it is unlawful to knowingly or intentionally manufacture, distribute, or dispense a controlled substance. Several states and territories have enacted state laws that allow for recreational or medical use of marijuana under some circumstances.¹³

Job Corps has a statutory zero tolerance policy for drug use, and requires centers to test new students for drug use within 48 hours of their arrival at a Job Corps center (see fig. 1).¹⁴ In its 2021 audit, the DOL Office of Inspector General (OIG) questioned whether Job Corps applicants should be tested for drugs before they are enrolled in the program. However, DOL's Employment and Training Administration responded that requiring Job Corps applicants to undergo drug testing prior to program enrollment could present legal risks by infringing upon applicants' constitutional

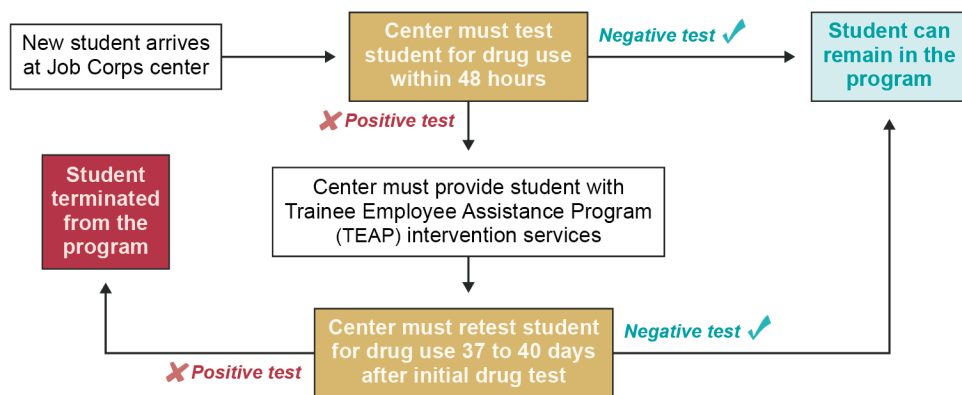
¹²Because law enforcement is not required to enter into agreements with centers, centers may not be able to establish an agreement or an agreement that completely addresses all requirements listed in the Job Corps Policy and Requirements Handbook for processing illegal drugs.

¹³CRS, *The Federal Status of Marijuana and the Expanding Policy Gap with States*, IF12270 (December 7, 2022).

¹⁴Job Corps conducts drug testing using a 10-panel drug test processed by a nationally contracted laboratory.

rights under the Fourth Amendment's protection against unreasonable searches.¹⁵

Figure 1: Job Corps Drug Testing on Program Entry Requirements and Consequences



Source: GAO analysis of Job Corps center procedures. | GAO-23-105589

The Policy and Requirements Handbook directs centers to provide enrolled students who test positive for drugs on program entry with drug intervention services to assist students in understanding their substance use and how to abstain from such use. These intervention services are generally provided under the leadership of the center's health and wellness unit's Trainee Employee Assistance Program (TEAP) specialist. Intervention services begin after a student's initial positive drug test and conclude with the follow-up drug test, which policy requires be conducted 37 to 40 days after the initial test. The Workforce Innovation and Opportunity Act (WIOA) requires DOL to establish procedures to test and receive results within 45 days after the student enrolls in Job Corps.¹⁶

Students determined to have violated the standards of conduct by testing positive for drug use in the follow-up test, or any test following the initial

¹⁵DOL OIG, *Job Corps Should Improve Its Pre-Admission Evaluation Process*, 05-21-001-03-370 (Washington, D.C.: Mar. 25, 2021).

¹⁶See 29 U.S.C. § 3195(a)(2)(A).

drug test, are terminated from the program.¹⁷ Any student separating from Job Corps who has a substance use condition must be provided with a referral for support services in their community. In addition to the initial testing, a center must test a student at any time for drug use if center officials have reasonable suspicion that a student has used drugs.

Selected Job Corps Centers Generally Followed Protocols though DOL Missed Some Deficiencies, and Concerns Remain About Drugs Getting through Security

Most of the Selected Job Corps Centers Generally Followed Security Screening Protocols, but Some Centers Omitted Key Requirements That Were Not Identified by DOL's Approval Process

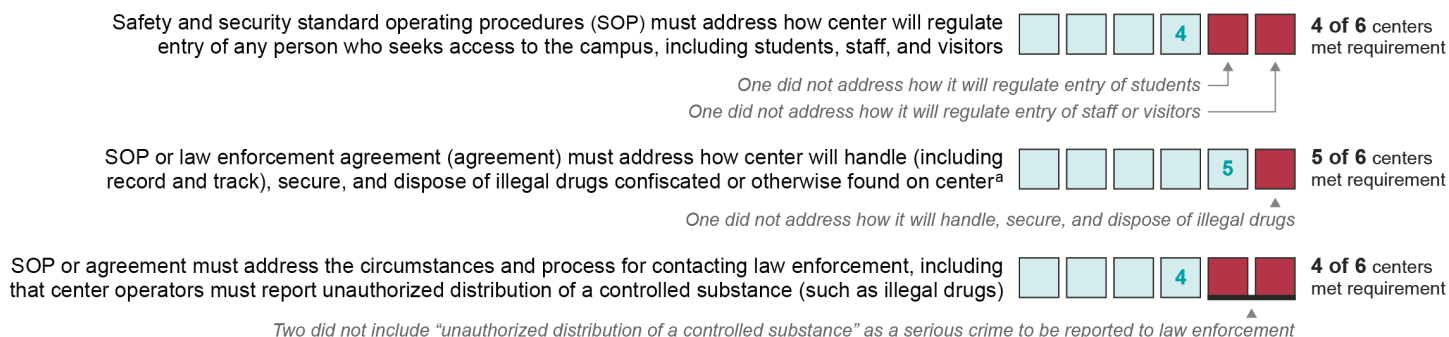
Standard Operating Procedures and Law Enforcement Agreements Compared to Job Corps Policy Requirements

We found that the six selected centers had established safety and security protocols to prevent drugs from entering their campuses as required. However, the documents sometimes omitted key requirements,

¹⁷According to the Policy and Requirements Handbook, students terminated for drug use are eligible to be re-admitted after 1 year. However, re-admitted students previously separated for drug use who test positive upon entering the program or any time during their second enrollment at Job Corps must be separated immediately without an intervention period. Such students are not allowed to reapply to Job Corps.

yet were approved by DOL.¹⁸ We reviewed the centers' current safety and security SOPs and local law enforcement agreements, and compared them to selected requirements in the Job Corps' Policy and Requirements Handbook.¹⁹ Although most of the SOPs and law enforcement agreements for the six selected Job Corps centers contained required information, some did not (see fig. 2). For example, the SOPs for two centers did not include information on how the centers would regulate the entry of students, staff, and visitors. One of those center's SOP also did not address the handling of illegal drugs. Also, the SOP or agreement for the same two centers did not include information on the circumstances and process for reporting the unauthorized distribution of controlled substances, such as illegal drugs, to law enforcement.

Figure 2: Extent to Which Safety and Security Standard Operating Procedures and Law Enforcement Agreements for Six Selected Centers Met Requirements Specified by the Job Corps Policy and Requirements Handbook



Source: GAO analysis of select requirements for safety and security standard operating procedures and local law enforcement agreements for six selected Job Corps centers. | GAO-23-105589

Note: For this analysis, we compared the centers' procedures to selected requirements of Job Corps' Policy and Requirements Handbook. We limited the scope of our review to security procedures related to preventing drugs from entering campus.

^aThe requirement to record and track drugs confiscated is specific to the safety and security SOP.

Officials from the national Office of Job Corps said a center's SOP may have omitted a required element because it addresses an uncommon circumstance for the center. For example, it may be rare for a center

¹⁸Five of six centers had a local law enforcement agreement on file. The sixth center had documentation that the local law enforcement does not enter into such agreements.

¹⁹For this analysis, we limited the scope of our review to security procedures related to preventing drugs from entering campus.

campus to receive visitors, but the officials acknowledged that the required element should be described in the SOP.

Although the Policy and Requirements Handbook states that Job Corps regional offices are to review SOPs for the centers they oversee, DOL has not provided the regional offices with written steps they should follow to ensure that SOPs contain all required elements before approving them. The Policy and Requirements Handbook states that centers are to submit their SOPs annually to both the national and regional offices. Officials from the national Office of Job Corps said that SOPs are reviewed by regional offices annually, at a minimum, and should not be approved when they do not contain the basic requirements.²⁰ DOL national officials told us that their Policy and Requirements Handbook describes the minimum requirements that must be contained in protocol documents. However, we found that the broad guidance does not provide the regions with written steps to guide the review process to ensure that required elements are included in protocol documents. Federal internal control standards state that management should document control activities through policies, including the operational process for how those activities will be implemented.²¹ However, DOL has not operationalized the broad requirements included in the Policy and Requirements Handbook into written procedures for regional offices to follow as they review SOPs. Without these procedures, centers' safety and security protocols may lack required elements and diminish centers' efforts to prevent drugs from entering their campuses.

Entry Security Screening Practices Compared to Standard Operating Procedures

The selected centers generally followed their written procedures on pedestrian entry security screening during onsite observations by our criminal investigators. Specifically, at the four centers with SOPs addressing the requirement to regulate entry of persons seeking access to campus, security officers generally followed these procedures for

²⁰Officials from the national office of Job Corps said that regional offices also review SOPs during compliance assessments, providing additional opportunities to identify any omissions of the basic requirements. According to the Policy and Requirements Handbook, regional offices conduct assessments at each center to monitor performance and compliance with program requirements at least twice during the center's 5-year contract.

²¹GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014).

pedestrian entrants.²² For example, our criminal investigators observed security officers screening pedestrian entrants using metal detection and inspecting their bags.

However, our criminal investigators observed that security officers did not follow vehicle entry screening procedures at the five centers that included these procedures in their SOPs.²³ Specifically, at four centers, we found that security officers did not always follow procedures such as asking staff or visitors to show identification, display parking passes, or undergo a physical inspection of their vehicles as required by their centers' written procedures. To monitor centers' adherence to their SOPs, DOL conducts routine monitoring to help ensure centers' practices follow their SOPs. Specifically, Job Corps regional offices conduct onsite assessments for compliance with program requirements, including the safety and security SOPs, roughly every 2 years. According to regional officials, these onsite assessments were on hold during the COVID-19 pandemic—which may have affected their ability to identify noncompliance. The officials stated, however, that the onsite assessments have resumed.

Also, when procedures were not explicit in centers' SOPs, our criminal investigators observed some variation among security officers' entry security screening practices. For example, at one center where the SOP did not explicitly address whether to screen delivery bags, our investigators observed that security officers did not always search delivery bags before they were given to students. At another center where the SOP did not address whether and how to inspect open food and drink containers, our investigators observed that security officers sometimes allowed students to bring open drink containers onto campus without physically or visually inspecting them.

²²At each center, there were some procedures that our criminal investigators were unable to observe in practice because a situation did not arise. For example, one center's procedures describe how to screen delivery packages; however, no deliveries occurred during the time that the criminal investigators were onsite.

²³The sixth center's SOP did not include vehicle screening procedures; therefore, we were unable to compare the observed vehicle screening practices to written procedures. During the observation at this center's campus, our criminal investigators saw a staff member arrive in a vehicle that was not physically or visually inspected; the staff member did present identification to the security officer, however.

Officials and Students at Selected Job Corps Centers Said Drugs Can Evade Detection at Entry, and Had Different Views Regarding the Adequacy of Screening Efforts

Job Corps center officials and students at the six selected centers reported that vulnerabilities in entry screening procedures could make it possible for drugs to get on their campuses, and shared different views regarding the adequacy of screening efforts. Officials from all six Job Corps centers said that students could potentially bring drugs and paraphernalia onto campus through security screening by hiding them in their clothing (such as undergarments), food, and other possessions. For example, a health and wellness director at one center said that because marijuana edibles can look like vitamins, they can be brought onto campus in what appears to be a sealed bottle. Another official said that because vape cartridges are plastic, they do not set off the metal detector.

Center directors and security personnel at the six selected Job Corps centers identified some vulnerabilities in their entry procedures that may make it possible for drugs to enter campus undetected. Vulnerabilities included restrictions on physical searches of students and lack of technology to detect drugs during the screening process. However, four center officials said they did not want to allow physical searches or cautioned against them because it would change the culture at the center or infringe on students' rights.

Instead, safety and security managers and Job Corps national officials described other steps they take to prevent drugs on campus. For example, safety and security managers described random room and locker inspections, monitoring campus security cameras, patrolling the campus perimeter, and inspecting packages delivered for students. In addition, officials with the national Office of Job Corps said they have installed enhanced video surveillance systems, video intercom systems, and access control systems at a majority of centers nationally. The officials said they are scheduling the installation of this equipment at additional centers in 2023, and are conducting research to identify the most efficient and effective way to outfit the remaining centers.

Although safety and security officials from all six selected centers acknowledged that some vulnerabilities exist in their entry screening procedures, they also considered drug use a minor concern on their campuses. The officials attributed this to steps they take to deter drugs on campus, as well as the lower enrollment at their centers due to the COVID-19 pandemic. Security officers interviewed at the six centers said they thought their center does a good job preventing drugs from coming onto campus. In addition, the security officers at five centers said they were either unaware of any attempts to get drugs on campus in the past

year or were aware of one attempt. The security officer for the sixth center reported 10 instances that were thwarted during the entry screening process. Our criminal investigators obtained and reviewed call logs from law enforcement agencies for the selected centers and confirmed that few drug-related incidents were reported by these centers.²⁴

Students also shared their views on drug use on their campuses and the adequacy of center efforts in keeping drugs off campus in response to our nongeneralizable questionnaire for the six selected centers. The majority of respondents—57 percent (198 of 349)—reported that they believed that Job Corps centers’ efforts to keep drugs from entering campus were sufficient.²⁵ However, 20 percent (69 of 349) disagreed, and 23 percent (82 of 349) were undecided.

Respondents were also asked to share any additional comments about drug use on their campus. The most common responses related to concerns that drugs were on campus and center staff did not do enough to prevent drugs on campus. Specifically, of students submitting open-ended responses (56), about 34 percent or 19 students indicated that drugs were getting onto campuses. About 38 percent or 21 students said they did not believe that screening procedures were adequate to keep drugs off of their campuses (see table 1).²⁶ The results from our questionnaire are not generalizable to the six centers or to Job Corps centers nationwide, but provide illustrative examples of the mixed

²⁴For each of the six selected Job Corps centers included in our review, our criminal investigators requested from local or state law enforcement, records of calls for service from the respective Job Corps center from July 1, 2021 through July 31, 2022. Our criminal investigators reviewed these call logs to identify the extent to which drug-related calls were reported from the centers. The service calls identified the following drug-related service calls; zero for three centers, one for one center, and three for one center. For the remaining center, law enforcement did not respond to our requests.

²⁵Our questionnaire asked “How much do you agree or disagree that your Job Corps center takes sufficient steps to prevent drugs from entering the Job Corps center campus?” We received a total of 349 completed responses. Although we use the term “respondents” to report our findings in this report, we could not determine whether we received responses from 349 separate individuals because we collected questionnaire responses from students anonymously. For more information, see appendix I.

²⁶At least one student in five of the six centers reported that drugs are on campus. At least one student in four of the six centers reported that security personnel or other center staff do not do enough or need to do more to keep drugs from coming onto campus. The questionnaire responses are not generalizable within or across Job Corps centers. See appendix I for more information.

perceptions of students regarding centers' efforts to keep drugs off their campuses.

Table 1: Student Responses to Nongeneralizable Questionnaire Regarding Drug Use on Job Corps Campus

Is there anything else you would like to share about drug use on campus at your Job Corps center?

GAO category	Percent of students responding (number of responses)
Security personnel or other center staff don't do enough to keep drugs from coming onto campus and/or need to do more to prevent drugs on campus	37.5% (21)
Drugs are on campus	33.9% (19)
Security personnel or other center staff don't take drug possession/use seriously	16.1% (9)
Have not seen drugs on campus	12.5% (7)
Fear of reporting	7.1% (4)
Center/staff doing a good job	7.1% (4)
Other ^a	30.4% (17)

Source: GAO analysis of open-ended responses to Job Corps student questionnaire. | GAO-23-105589

Notes: We reviewed and coded the open-ended responses into the categories above. We administered an online anonymous questionnaire to Job Corps students actively enrolled at the six selected Job Corps centers included in our review. We enlisted the assistance of the national Office of Job Corps and the six centers' directors to distribute the questionnaire online on our behalf. The centers sent the questionnaire to students at their respective sites between July 29, 2022 and August 4, 2022. Out of 349 total respondents, 56 respondents (16 percent of the total 349 respondents) answered the open-ended question with a response other than "no," "nothing," or "N/A." Although we use the term "respondents" to report our findings in this report, we could not determine whether we received responses from 56 separate individuals because we collected questionnaire responses from students anonymously. For more information, see appendix I.

Percentages do not total 100 percent because some respondents provided information pertaining to more than one of the categories.

^aSeventeen respondents provided answers for which we were unable to identify commonalities, and we therefore categorized as "other."

Job Corps students' responses to anonymous questionnaire at selected centers

Is there anything else you would like to share about drug use on campus at your Job Corps center?

[Minor edits made to improve readability]

- “There are a large amount of students that have access to illegal drugs and substances, yet our security only seems to care when it’s obvious. They have given the response that they shouldn’t be involved unless it is an emergency, and I guess drug use isn’t an emergency.”
- “People sneak dab pens in to this day and I used to smoke weed and it’s kinda triggering me to smoke so with that being said I think they should do a better job keeping drugs off campus.”
- “All I can say is they’re definitely not stopping it from entering. If they had better surveillance it might not be a problem, but people are capable of leaving and entering whenever they want.”
- “People bring weed in all the time. It’s everywhere in the dorms....”
- “My center is doing their very best when it comes to disciplining students who don’t follow the rules.”
- Job Corps takes drug use on campus very seriously, as they do with other situations that they have dealt with before. I don’t have any other further comment to make other than this one.”

Source: GAO analysis of open-ended responses to student questionnaire. We administered an online anonymous questionnaire to Job Corps students actively enrolled at the six selected Job Corps centers included in our review. | GAO-23-105589

DOL and the national office of Job Corps have taken steps to gather feedback from students on safety at centers, including whether drugs are used and distributed on campuses. For example, DOL developed the Student Safety Assessment that is designed to be administered monthly to randomly selected students.²⁷ The survey was approved by the Office of Management and Budget in 2020. However, officials with the national Office of Job Corps said that because Job Corps enrollment dropped significantly during the COVID-19 pandemic, they are waiting for enrollment to increase before administering the survey to avoid sampling the same students repeatedly. DOL also solicits student safety concerns via its Safety Hotline, which has been operational since 2017.

²⁷The Student Safety Assessment will replace the Student Satisfaction Survey that was last administered in September 2019. The new Student Safety Assessment revised and expanded upon safety-related questions asked in the previously administered Student Satisfaction Survey.

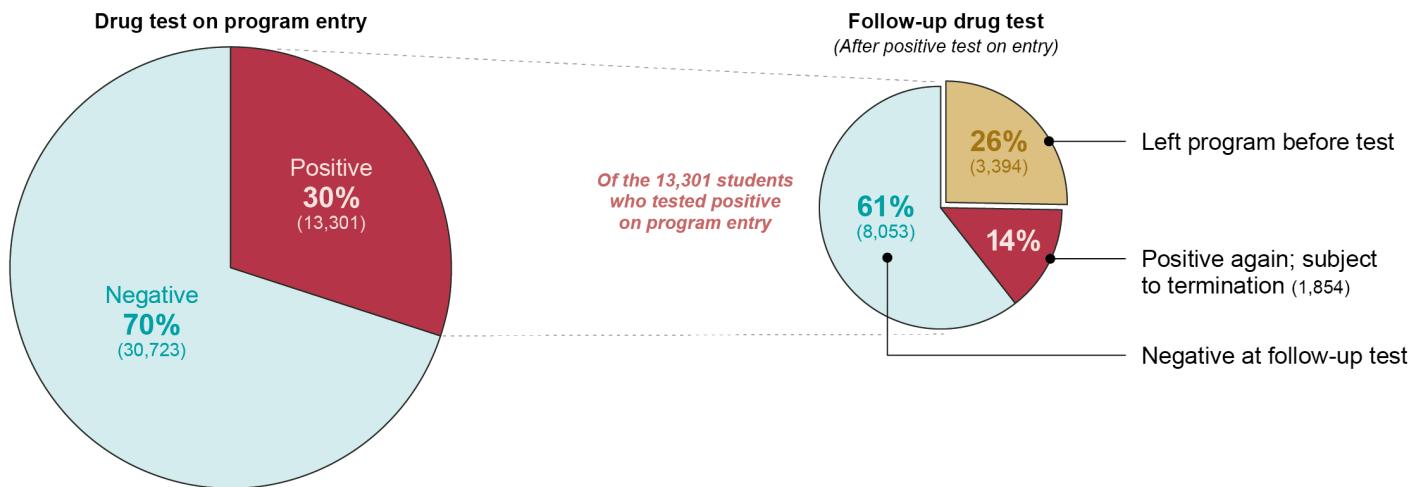
Most Students Testing Positive for Drugs on Entry in Program Year 2018 Had Slightly Lower Completion Rates, but More Drug-Related Incidents Compared to Other Students

Thirty Percent of Students Tested Positive for Drug Use on Entry in Program Year 2018 and Over Half of Those Students Tested Negative on Follow-up Drug Tests

Our analysis of DOL and Job Corps contractor data showed that 13,301 (30 percent) of the 44,024 students who enrolled in Job Corps in program year 2018 tested positive for drug use when they first arrived at their center—referred to as program entry (see fig. 3).²⁸ Marijuana accounted for 90 percent of positive drug tests included in our analysis. Of those who tested positive on program entry, nearly 75 percent remained in Job Corps to receive a follow-up drug test at the end of the TEAP intervention period—the time between the initial and follow-up drug tests when intervention services are provided.

²⁸Our analysis focused on the students who enrolled in program year 2018 (July 1, 2018 through June 30, 2019) and information about their progress in Job Corps from the time of their enrollment through September 2022, when we received data. Because DOL does not maintain data on student drug test results, this analysis matched DOL's drug testing lab contractor data on student drug tests with DOL's Job Corps data on student information to identify students' drug test results using a unique student identifier. We were unable to identify drug test results for all students listed in the Job Corps data system who enrolled in program year 2018. We excluded a total of 2,940 students comprising 6.3 percent of the 46,964 students who enrolled in program year 2018. For each value in this report, the number presented is the minimum number of students. The maximum possible number would include the additional 2,940 students we excluded. The 95th percentile is 1,700 of the 2,940 students, signifying that the range of 13,301 to 15,001 students includes 95 percent of all possible numbers of students testing positive on entry in program year 2018 out of the 46,964 students who enrolled that year. See appendix I for more information on our scope and methodology.

Figure 3: Drug Test Results for Students Who Enrolled in Job Corps in Program Year 2018



Source: GAO analysis of data from the Department of Labor and its national drug testing lab contractor. | GAO-23-105589

Notes: We were unable to identify drug test results for all students listed in the Job Corps data system who enrolled in program year 2018 (July 1, 2018 through June 30, 2019). We excluded a total of 2,940 students comprising 6.3% of students who enrolled in program year 2018.

Percentages in this figure may not total 100 percent due to rounding. Specifically, of students that tested positive on entry, 60.5 percent tested negative during the follow-up test, 13.9 tested positive during the follow-up, and 25.5 left the program before the follow-up test.

Over one-half of Job Corps students (61 percent) who tested positive for drug use on program entry in program year 2018 tested negative during a follow-up drug test. However, nearly 40 percent of students who tested positive on program entry left the program (voluntarily or involuntarily) before the follow-up drug test, or were terminated from the program when they tested positive during the test.²⁹

About one-quarter (3,394) of the students who tested positive for drug use on program entry in program year 2018 did not have a record of a follow-up drug test. Our analysis showed that about 23 percent of those students resigned, left for medical reasons, or left because their parents withdrew their consent for enrollment. The other 77 percent of those students were terminated for disciplinary reasons or unexcused absences (see table 2).

²⁹Percentages do not total 100 due to rounding. Specifically, of students that tested positive on entry, 60.5 percent tested negative during the follow-up test, 13.9 tested positive during the follow-up, and 25.5 left the program before the follow-up test.

Table 2: Reasons for Separating from Job Corps among Students Who Enrolled in Program Year 2018 and Tested Positive for Drugs on Program Entry, but Separated Prior to Receiving a Follow-up Drug Test

Reasons for separation	Number of students (percent) ^a
Disciplinary—Student has committed a disqualifying behavioral infraction.	1,659 (48.9%)
Unauthorized absence—Student has accrued unauthorized absences from scheduled training days.	960 (28.3%)
Resignation—Student voluntarily resigned from Job Corps.	365 (10.8%)
Medical—Student is no longer able to participate in Job Corps due to medical, dental, substance use, or mental health reasons.	289 (8.5%)
Withdrawal of parental consent—Legally responsible parent or guardian withdraws consent for enrollment of a minor student.	117 (3.4%)
Other ^b	4 (0.1%)

Source: GAO analysis of data from Department of Labor and its national drug testing lab contractor. | GAO-23-105589

Note: Reasons for separating are for students who enrolled in Job Corps in program year 2018 (July 1, 2018 through June 30, 2019) and tested positive for drug use on program entry, but separated before receiving the required follow-up drug test. The separation reasons are how DOL categorizes these separations.

^aPercentages may not add up to 100 percent due to rounding.

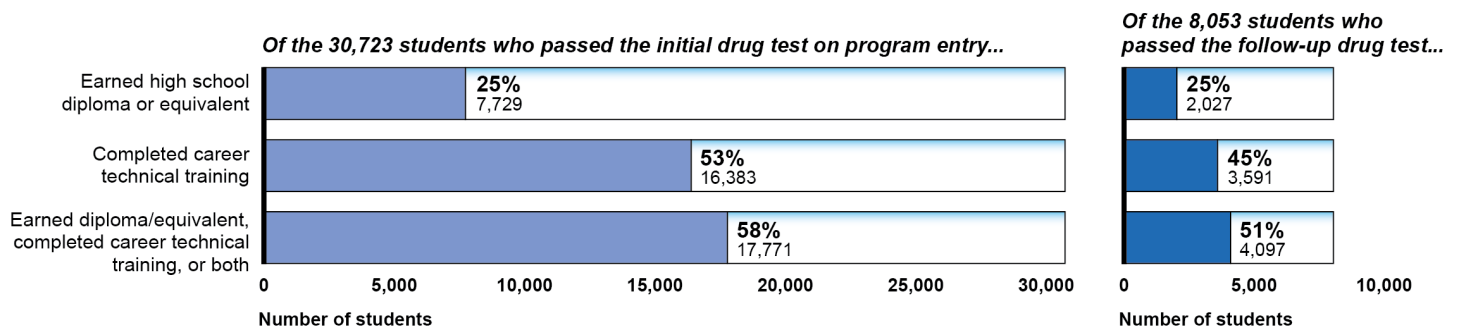
^bOther reasons for separation include fraudulent enrollment and ordinary separation, when a student has completed the Job Corps program as scheduled.

Our analysis found that centers tested 1,101 students who enrolled in program year 2018 based on reasonable suspicion of drug use. Of those, 57 percent (628 students) tested positive for drug use that year, which under program requirements, is grounds for termination from the program. Of the students that tested positive, 67 percent (420 students) had previously tested positive for drug use on program entry before they were tested based on reasonable suspicion of drug use. About 21 percent (131 students) had a positive test that was administered based on reasonable suspicion of drug use before their follow-up drug test. Forty-six percent (289 students) had negative follow-up drug tests and later had a positive test administered based on reasonable suspicion.

Students Enrolled in Program Year 2018 Who Passed the Follow-up Drug Test Had a Slightly Lower Rate of Completion and Committed More Drug-Related Incidents than Other Students

Students who passed the follow-up drug test in program year 2018 completed Job Corps at a slightly lower rate than students who tested negative for drug use on program entry. The Job Corps' Policy and Requirements Handbook states that a student has completed the program by (1) earning a high school diploma or high school equivalency credential, (2) completing a career technical training program, or (3) both. The rate of completion for earning a high school diploma or equivalent for students who passed the follow-up drug test was about the same (25 percent) as students who tested negative on program entry. However, overall, students who passed the follow-up drug test completed Job Corps at a slightly lower rate compared to students who tested negative on program entry (see fig. 4).

Figure 4: Completion Rates of Students Who Enrolled in Job Corps in Program Year 2018 (July 1, 2018–June 30, 2019) by Drug Test Results



Source: GAO analysis of data from the Department of Labor and its national drug testing lab contractor. | GAO-23-105589

Note: Students who tested positive at program entry and left or were terminated before the follow-up test are not included in this figure. Students who do not have a high school diploma or equivalent upon enrolling in Job Corps are required to work towards earning one in the program, according to Department of Labor officials.

Job Corps centers reported that some students who passed the follow-up drug test were involved in safety and security incidents, and committed more drug-related incidents than students who tested negative for drugs on program entry.³⁰ Our analysis of DOL's data from its Significant Incident Reporting System showed that Job Corps centers reported

³⁰For this analysis, we reported incident types according to the primary incident type that was assigned to each incident. Incidents may also have secondary and tertiary types. According to DOL guidance, positive entry tests reflect students' drug use prior to enrollment and are not to be reported as incidents. Positive follow-up tests and tests administered based on suspicion of drug use are to be reported as incidents.

14,242 safety and security incidents committed by students who enrolled in program year 2018. Students who passed the follow-up drug test were reportedly responsible for 3,450 of these incidents.³¹ Drug-related incidents (27 percent) and assaults (24 percent) accounted for about half of the 3,450 reported incidents (see table 3).³² Students who tested negative for drug use on program entry in program year 2018 were reported as committing 7,106 safety and security incidents. Assaults (29 percent) and breach of security/safety incidents (16 percent) accounted for 45 percent of these reported incidents, while drug-related incidents made up 12 percent.

Table 3: Reported Safety and Security Incidents Committed by Students Who Enrolled in Program Year 2018 Based on Drug Tests Results

Incident type	Number (percent) of incidents ^a	
	Students who tested positive for drug use on program entry and passed their follow-up drug tests	Students who tested negative for drug use on program entry
Alcohol-related incident	283 (8%)	625 (9%)
Arrest	101 (3%)	223 (3%)
Assault	837 (24%)	2,036 (29%)
Breach of security/safety	422 (12%)	1,105 (16%)
COVID-19 ^b	0 (0%)	6 (0.1%)
Danger to self or others	31 (0.9%)	200 (3%)
Death	0 (0%)	2 (< 0.1%)
Drug-related incident ^c	916 (27%)	864 (12%)
Hospitalization	0 (0%)	18 (0.3%)
Inappropriate sexual behavior	26 (0.8%)	120 (2%)
Incident attracting potentially negative media attention	30 (0.9%)	77 (1%)
Incident involving a missing minor student	4 (0.1%)	26 (0.4%)
Incident involving illegal activity (not in any other code)	0 (0%)	7 (0.1%)
Incident involving law enforcement	68 (2%)	169 (2%)
Inciting a disturbance	143 (4%)	302 (4%)
Missing person	19 (0.6%)	40 (0.6%)

³¹Our analysis included incidents that were reported as committed by student perpetrators who enrolled in program year 2018, for incidents that were reported in the Significant Incident Reporting System in program year 2018 through program year 2021.

³²The incident categories in this report are taken directly from DOL documentation and represent how DOL categorizes these incidents. Drug-related incidents include intent to distribute, possession, trafficking, use, and other.

Incident type	Number (percent) of incidents ^a	
	Students who tested positive for drug use on program entry and passed their follow-up drug tests	Students who tested negative for drug use on program entry
Motor vehicle accident	1 (< 0.1%)	20 (0.3%)
Safety/hazmat	3 (0.1%)	4 (0.1%)
Serious illness/injury	22 (0.6%)	65 (0.9%)
Sexual assault	47 (1%)	114 (2%)
Student accountability ^d	240 (7%)	465 (6%)
Theft or damage to property, center, staff, or student	257 (7%)	627 (9%)
Total	3,450 (100%)	7,106 (100%)

Source: GAO analysis of data from the Department of Labor and its national drug testing lab contractor. | GAO-23-105589

Note: Students who tested positive at program entry and left or were terminated before the follow-up test are not included in this table. This table includes incidents that centers reported in program year 2018 through program year 2021 to DOL's Significant Incident Reporting System that were reported as committed by student perpetrators who enrolled in program year 2018 (July 1, 2018 through June 30, 2019). This table shows the primary incident type that was assigned to each incident. We did not include incidents' assigned secondary and tertiary types in this report. The incident categories in this report are taken directly from DOL documents and represent how DOL categorizes these incidents. There may be overlap between categories.

^aPercentages may not add up to 100 percent due to rounding.

^bCOVID-19 incidents include all positive COVID-19 tests.

^cDrug-related incidents include intent to distribute, possession, trafficking, use, and other.

^dStudent accountability incidents include missing persons, missing minor students, and unauthorized exits.

Students who tested positive on the follow-up drug test or left the program before the follow-up test accounted for 3,686 (26 percent) of the 14,242 incidents reported in the Significant Incident Reporting System, including incidents that were positive follow-up tests. Specifically, students who tested positive on their follow-up drug tests, which under program requirements is grounds for termination, were reported as committing 1,860 of the 14,242 safety and security incidents. The vast majority of these incidents were due to positive drug test results. Students who tested positive on entry but left before their follow-up drug test were reported as committing 1,826 or 13 percent of incidents.

Selected Job Corps Centers Provided Students with Discussion Sessions and Other Intervention Services, but Students Had Varied Perceptions of These Services

The six selected Job Corps centers provided discussion sessions and other services to students testing positive for drug use during the TEAP intervention period based on our analysis of a random, nongeneralizable sample of 81 program year 2018 student health records.³³ Specifically, the centers provided students with individual and group discussion sessions with a TEAP specialist, provided them with opportunities for physical activity, and encouraged them to drink water to help flush from their bodies the drugs they used prior to entering Job Corps.

Although Job Corps does not provide drug counseling and treatment, Job Corps policy requires centers to provide individual and group intervention services with attention to behaviors that represent employability barriers among other topics. The guidance also requires centers to document the services provided but acknowledges that the structure and delivery of those services will vary by center needs, skills, and staff expertise. Most of the records we reviewed contained documentation that the student received some type of intervention service. Specifically, 72 of 81 records we reviewed across all six selected centers included documentation that at least one intervention service was provided to the student.³⁴

Individual and group discussion sessions. Among the sample of student records we reviewed for the six selected centers, the centers most often provided the students with individual and group discussion sessions. Five centers used individual and group sessions to support students during the intervention period, while one center used individual sessions only. Overall, more students received group sessions (60 of 81), than individual sessions (55 of 81).

Our review of the sample of student health records indicated that the purpose and frequency of the individual sessions varied among the centers. For example, at some centers, the records we reviewed suggested the primary purpose of the individual sessions was to inform students of their drug test results and introduce them to the TEAP intervention period. At some centers, the records documented recurring meetings with the TEAP specialist and students to discuss their progress during the intervention period, such as whether they were attending group

³³For each of the six selected centers, we reviewed a random, nongeneralizable sample of 10 percent of student health records for those who tested positive for drug use on program entry in program year 2018.

³⁴Nine of 81 student health records we reviewed did not include documentation that any intervention services were provided to the student. These nine records were for students at three of the six centers.

sessions and participating in physical activity. At other times, TEAP specialists documented discussions with students regarding their plans for abstaining from drug use while on visits to their homes. In some instances, the records indicated the student talked to the specialist about other personal difficulties, such as relationships with other students.

Documentation of group discussion sessions described a variety of topics and activities conducted in these groups. According to our review of student health records, group discussion topics included assignments to help identify the reasons for student's drug use and its impact on their lives. Other topics included relapse prevention and developing a plan to avoid future drug use. For example, in some groups, students were asked to identify activities they could pursue other than using drugs. TEAP specialists used a variety of resources, such as drug education films and contemporary movies, to spur discussion about drug use.

TEAP specialists said that their use of individual or group discussion sessions was sometimes determined by various factors, such as the student's preferences and availability. For example, one TEAP specialist told us that providing more individual discussion sessions was effective for students who are uncomfortable sharing information in a group environment. Another TEAP specialist told us smaller group sessions facilitated greater participation among students uncomfortable with sharing information in larger groups.

Physical activity and hydration. Five of six selected centers also provided physical activity opportunities (28 of 81 records) as an intervention service for students who tested positive for drug use on program entry, but varied in the extent to which they documented this service.³⁵ For example, while five of six selected centers' records contained documentation of students' physical activities for at least some students, one of five centers documented physical activity in all of the records we reviewed. Our review of records for the sixth center suggested physical activity was not provided as an intervention service. In addition, some centers required students to engage in a minimum number of hours or sessions of physical activity during the TEAP intervention period. Physical activities included basketball, running laps, and walking. TEAP

³⁵Although many of the student health records documented that physical activity was part of the intervention services for students testing positive for drug use on program entry, according to the Job Corps' Policy and Requirements Handbook, centers must provide all Job Corps students with recreation, such as fitness classes, organized sports, and exercise groups.

specialists at some centers told us that they led group exercise sessions, and in other centers, certain hours in the gym were reserved for students who were required to participate in intervention services.

Job Corps students' responses to anonymous questionnaire at selected centers

Please describe what worked well, if anything, about the TEAP-provided substance use intervention services provided by your Job Corps center

[Responses presented unedited, as written by respondents]

- "Having to do group with other people that want to change their life."
- "Just speaking on substance abuse as well as the encouragement to be active and putting steps in place to better myself."
- "talking."
- "I loved the program and I talked to the TEAP counselor all the time, they're super supportive probably the biggest and best support system I had at [...] Jobcorps."
- "The fact that the specialists cared so much."

TEAP= Trainee Employee Assistance Program

Source: GAO analysis of open-ended responses to student questionnaire. We administered an online anonymous questionnaire to Job Corps students actively enrolled at the six selected Job Corps centers included in our review. | GAO-23-105589

Our review of the sample of student health records and interviews with TEAP specialists also indicated that some centers encouraged students to hydrate during the TEAP intervention period as an aid to help rid their bodies of the drugs they used prior to entering Job Corps. Specifically, four of six centers' records we reviewed (22 of 81), contained documentation that the TEAP specialist encouraged at least some of the students to hydrate. In some cases, notes from individual and group sessions indicated the TEAP specialist reminded the students to hydrate frequently, such as drinking a certain number of bottles of water daily. In our interviews with center staff, they emphasized the importance of physical activity and hydration to help students achieve a negative drug test result at the conclusion of the TEAP intervention period.

Student satisfaction with TEAP intervention services. Students responding to our nongeneralizable questionnaire in the six selected centers reported varied perceptions of the TEAP intervention services they received.³⁶ Specifically, 29 of 70 respondents who reported receiving intervention services from their Job Corps center indicated that they were satisfied with these services.³⁷ Eighteen respondents reported that they were unsatisfied with the services, while 23 reported being undecided about how satisfied they were with the services.

³⁶We administered an online anonymous questionnaire to Job Corps students actively enrolled at the six selected Job Corps centers included in our review. We enlisted the assistance of the national Office of Job Corps and the six centers' directors to distribute the questionnaire online on our behalf. The centers sent the questionnaire to students at their respective sites between July 29, 2022 and August 4, 2022.

³⁷Of 349 total respondents to the questionnaire, 70 reported that they had received TEAP intervention services from their Job Corps center. The questionnaire asked those respondents questions about the intervention services they received. This question asked "Overall, how satisfied do you feel about the TEAP-provided substance use intervention services provided to you by your Job Corps center." Although we use the term "respondents" to report our findings in this report, we could not determine whether we received responses from 70 separate individuals because we collected questionnaire responses from students anonymously. For more information, see appendix I.

Job Corps students' responses to anonymous questionnaire at selected centers

Please describe what did not work well, if anything, about the TEAP-provided substance use intervention services provided by your Job Corps center

[Minor edits made to improve readability]

- "they just put up a slide show and talk."
- "drug and alcohol counseling is lacking."
- "Not a lot of students were open about their use."

TEAP= Trainee Employee Assistance Program

Source: GAO analysis of open-ended responses to student questionnaire. We administered an online anonymous questionnaire to Job Corps students actively enrolled at the six selected Job Corps centers included in our review. | GAO-23-105589

We also asked respondents to provide open-ended comments about what they felt worked well regarding the TEAP services they received. The small number of responses included comments such as that discussion sessions and opportunities to communicate worked well for them.³⁸ We also asked what did not work well. Nine respondents commented "nothing" and we were unable to identify any other commonalities in the respondents' comments.³⁹

Officials at Selected Job Corps Centers Reported That Staffing Challenges and Other Issues Complicate Efforts to Support Students Who Test Positive for Drug Use

³⁸Out of 349 total survey responses, 43 respondents provided some type of response to this open-ended question "Please describe what worked well, if anything, about TEAP-provided substance use intervention services provided by your Job Corps center," including 11 that responded "no," "n/a," or "haven't attended". We were unable to interpret those responses.

³⁹Out of 349 total survey responses, 43 respondents provided some type of response to this open-ended question "Please describe what did not work well, if anything, about TEAP-provided substance use intervention services provided by your Job Corps center," including 20 that responded "no," "n/a," or "haven't attended". We were unable to interpret those responses.

Challenges Recruiting and Retaining Specialists Who Provide Intervention Services Could be Mitigated with Data Collection and Exploring Hiring Flexibilities

Difficulties recruiting and retaining qualified TEAP specialists negatively affect a center's ability to provide intervention services to students who test positive for drugs, according to officials in five of six selected centers. Specifically, they said that vacancies in the TEAP specialist position limited the implementation and effectiveness of intervention services, and in some cases, prevented students from receiving intervention services. For example, officials in one center said that a TEAP specialist vacancy prevented them from providing individual and group discussion sessions and other intervention services students needed. Officials in another center said that frequent TEAP specialist vacancies and high turnover interrupted their ability to provide intervention services and decreased the quality of their services.

Our review of DOL compliance assessments from program years 2017 and 2018 (the most recent at the time of our review) also found that at that time two of six selected centers did not provide students with intervention services when they had TEAP specialist vacancies. According to officials in the national Office of Job Corps, the program is legally required to terminate students with positive follow-up drug tests. However, they stated that students can appeal the termination decision, and some students have done so successfully when they did not receive intervention services.⁴⁰ Nationally, in program year 2021, about 8 percent of centers responding to a DOL survey (nine of the 116 responding centers) reported TEAP specialist vacancies. Officials in five of six selected centers said they had either a recent, current, or upcoming TEAP specialist vacancy.⁴¹

Officials in five of six selected centers said that Job Corps' TEAP specialist qualification requirements hindered their efforts to recruit and retain TEAP specialists. Job Corps' Policy and Requirements Handbook requires that TEAP specialists hold a substance abuse counseling certification in the state where the center is located. However, officials at two centers said that this qualification requirement is sometimes cost-prohibitive for otherwise suitable candidates, who pay the cost of obtaining the certification. In addition, one center official said the lack of nearby schools providing the certification can present a challenge for

⁴⁰Officials said the provision or lack of intervention services is considered along with any other evidence presented in an appeal.

⁴¹Job Corps' program year 2021 survey collected voluntary, self-reported responses from centers in January to March 2021. For more information, see appendix I.

candidates, stating that the closest school providing this certification was located far from the center's campus.

Officials from the six selected centers also described a misalignment between the required certification, the duties of the position, and the pay offered. For example, they said that TEAP specialists who possess the certification are trained drug counselors, but DOL's technical assistance guide for TEAP specialists states that Job Corps does not provide drug counseling or treatment to students. One center official said potential candidates can find positions in treatment centers and correctional facilities without obtaining the state certification. Other center officials said that prospective candidates who possess the certification can find positions elsewhere that offer higher salaries or are better aligned with their expertise in drug counseling and treatment.

Officials at the national Office of Job Corps acknowledged difficulties hiring and retaining TEAP specialists and said that centers may not be offering competitive salaries. They said that DOL's current qualifications requirement for TEAP specialists is necessary to meet students' health care needs. Specifically, the officials said that only certified substance abuse counselors can appropriately identify students with substance use disorders and refer them to substance abuse treatment outside of the program when warranted.⁴²

Although DOL requires TEAP specialists to obtain the substance abuse counseling certification, it currently allows centers to request waivers of the requirement. DOL issues year-long, nonrenewable waivers that allow centers to temporarily hire TEAP specialists who do not have the required substance abuse counseling certification. With a waiver, a TEAP specialist can work at a Job Corps center for up to 1 year while pursuing the necessary certification. A TEAP specialist who does not earn the certification within the year cannot continue in the position. At the time of our review, four of six selected centers had a TEAP specialist working under a waiver.

DOL does not collect nationwide data on waivers, but some information is available on the number of waivers the national health support contractor

⁴²Students identified with a substance use condition may be separated from the program (Medical Separations with Reinstatement Rights) but are eligible to reapply within 180 days if they provide proof of completing treatment.

recommended for approval from program years 2016 through 2021.⁴³ These recommendations indicate that at least 10 percent of centers used waivers in 5 of the 6 years. Over 20 percent of centers used waivers in program year 2019 and 2020.

Some centers used waivers over consecutive years, indicating prolonged challenges recruiting certified TEAP specialists and retaining those hired using a waiver. During program years 2016–2021, two centers used waivers for 4 consecutive years, four centers used them for 3 consecutive years, and 10 centers used waivers for 2 consecutive years, according to the information DOL provided on waiver recommendations. This suggests some TEAP specialists hired using a waiver may not have completed the certification within the required year, necessitating that the center hire a new TEAP specialist.

Centers' prolonged use of waivers indicates that the waivers do not fully address staffing challenges. Regional office directors we interviewed said that regional offices and centers employ several other strategies to address TEAP specialist vacancies. These strategies include hiring short-term certified staff through temporary employment agencies, having other center staff perform some duties, and partnering with community-based organizations to perform some TEAP specialist duties.

Regional office directors we interviewed suggested that changes in national policy could increase flexibilities for recruiting and retaining TEAP specialists. For example, two regional directors said DOL should consider allowing certified staff to share responsibilities with or supervise uncertified TEAP specialists. Another regional office director said TEAP specialists should be able to work under a certification they may have earned in a different state, such as where they attended college or completed their training program.

Despite national Office of Job Corps officials acknowledging the continued difficulties centers face in recruiting and retaining qualified TEAP specialists, DOL has not assessed actions it could take to leverage hiring flexibilities to address this issue. Officials agreed there would be

⁴³Officials at the national Office of Job Corps provided this information based on email transmittals of recommendations to approve waivers that the agency had received from its national health support contractor. Officials said the national Office approved waivers on a case-by-case basis for candidates pursuing the state certification. They also said that the documented numbers of recommendations are most likely an undercount because additional records of recommendations may not be readily accessible due to staff turnover.

benefits to doing so, and said they had begun to explore whether Job Corps would be able to provide center operators with additional funding to increase TEAP specialists' compensation in order to improve retention. However, officials said they were in the initial stages of looking into the matter and did not know if any changes would be feasible. Further, officials said they had no plans to assess other options to leverage hiring flexibilities. For example, officials had not reassessed the knowledge and skills needs of the agency related to TEAP specialists or determined the feasibility of alternative approaches to providing TEAP services. Officials at the national Office of Job Corps said they have not assessed hiring flexibilities to assist centers in filling TEAP specialist vacancies because their priority is to ensure that all TEAP specialists have the required certification once the waiver period has expired.

Without assessing actions DOL could take to leverage hiring flexibilities to fill TEAP specialist vacancies, DOL may be missing opportunities to help ensure centers are positioned to provide intervention services to help students successfully complete the program.⁴⁴ Recruitment and retention leading practices state that agencies should (1) continually assess the knowledge and skills needs of the agency to achieve its goals, and (2) strategically leverage available hiring flexibilities and offer recruitment and retention incentives, such as competitive compensation.⁴⁵ The Job Corps Safety and Security Strategic Plan includes a goal to ensure Job Corps has policies in place to promote safe and secure centers.⁴⁶ This goal includes expanding TEAP specialists' services in order to support students' success and better address safety and security concerns associated with drug use.

DOL also does not require the national Office of Job Corps to collect and monitor data on recruiting TEAP specialists using waivers and retaining those who obtain certification in order to assess waivers' effectiveness. For example, DOL does not require the national Office of Job Corps to collect data on the numbers of TEAP specialists hired under a waiver, and whether they earn the required certification or leave the position

⁴⁴Job Corps' Policy and Requirements Handbook requires centers to provide individual and group intervention services to students who test positive for drug use on entry into the program.

⁴⁵[GAO-22-105932](#). GAO developed these leading practices based on our analysis of workforce-related areas and practices identified in federal Office of Personnel Management guidance and our prior work.

⁴⁶DOL, *Job Corps Safety and Security Strategic Plan: A Framework for the Job Corps Center Safety and Security*. (Feb. 2019).

without obtaining it. Officials at the national Office of Job Corps said they do not collect these data because doing so would not affect centers' obligation to hire TEAP specialists. Officials also said their priority is to ensure that all TEAP specialists have the correct certification once the waiver period has expired. However, the data could help officials achieve this priority by informing DOL of how many TEAP specialists do not have the certification, and the extent to which waivers help centers employ TEAP specialists who gain the credential and continue employment.

Federal standards for internal controls state that agencies need quality information for effective monitoring and informed decision-making.⁴⁷ Also, recruitment and retention leading practices state that agencies should use data that enable the agency to evaluate the successes of its human capital approaches. Agencies should also establish, track, and continually assess metrics to monitor the effectiveness of the recruitment program at addressing skills and vacancies, and report to agency leadership on progress addressing skill and vacancy gaps.⁴⁸ Without a requirement to collect data on recruiting TEAP specialists using waivers and retaining those who obtain certification, DOL cannot assess waivers' effectiveness and ensure that centers provide high-quality intervention services to students.

Center Officials Said the Required Time Frame for Follow-up Drug Testing Is Too Short, and DOL Has Suggested Statutory Changes

At least one official at each of the six selected centers said the length of time between the initial drug test and follow-up test for students is too short. According to officials, this may cause a positive result during the follow-up test even in some cases when students have not used drugs since starting the Job Corps program. Officials at the national Office of Job Corps shared this concern, stating that even students who stop using drugs when they enter the program may retain a sufficient concentration of drugs in their bodies to produce a positive result during the follow-up test. Center officials described several challenges related to the short time period:

- **Differences in Student Characteristics.** Officials in the six selected centers stated different characteristics and behaviors (e.g., weight, gender, diet and exercise habits, and frequent marijuana use prior to entry) affected whether students achieved a negative test in the allotted time period. For example, some center officials raised concerns about body mass index because overweight or obese

⁴⁷GAO-14-704G.

⁴⁸GAO-22-105932.

students may have difficulty ridding their bodies of drugs such as marijuana.

- **Lingering Potency of Marijuana Products.** Officials in five centers said the higher potency of modern marijuana products may linger, making it difficult for students to rid their bodies of the drug. As previously noted, marijuana accounted for about 90 percent of positive drug tests included in our analysis.⁴⁹ Students who are unable to flush drugs from their bodies through exercise and hydration, and fail their follow-up drug test, are removed from the program. For example, officials in one center said that even when they believed students were abstaining from drugs, some students were removed from the program and lost educational opportunities.
- **Insufficient Time for Relationship Building.** Officials in five centers also said the TEAP intervention period between drug tests should be extended so that center staff have more time to build relationships with students, elicit buy-in, and educate students about how drugs will impact their lives and careers. One center official said having more time to work with the students would make the TEAP intervention period more effective because staff would be able to identify and address the underlying issues that led to students' drug use. Another official said having more time to work with students would help them break drug habits.

Because the 45-day time period for receiving drug testing results is established in law, officials at the national Office of Job Corps said DOL cannot change it. Instead, officials said they had suggested lengthening the timeline as part of their technical assistance to Congress for the next reauthorization of Job Corps under the Workforce Innovation and Opportunity Act (WIOA).

Additionally, officials in four of six selected centers said the Job Corps program should test and report THC metabolite levels detected in students' drug tests, rather than relying on current tests' binary positive/negative results.⁵⁰ For example, officials said that knowing the metabolite levels could help them understand whether students were using marijuana during the intervention period. According to one official,

⁴⁹We analyzed drug test results for students who enrolled in Job Corps during program year 2018 (July 1, 2018 through June 30 2019).

⁵⁰Tetrahydrocannabinol (THC) is the mind-altering chemical in marijuana. A metabolite is any substance produced or used during metabolism (digestion). In drug use, a metabolite usually refers to the end product (what remains after metabolism).

such information could be used as a basis for students to appeal termination. Officials in the national Office of Job Corps said they previously reported THC levels on all drug tests, but ended this practice to ensure test results are applied consistently in making decisions to terminate students who receive a positive follow-up test. However, these officials also said that they have heard this concern and are re-examining the issue.

Officials at Selected Job Corps Centers Said that State Legalization and Relaxed Societal Attitudes toward Marijuana Affected Their Ability to Discourage Student Drug Use

Officials in all six selected centers said state-level marijuana legalization and students' attitudes toward marijuana negatively impact students' participation and buy-in to intervention services. Four center officials stated that students did not understand why they could not use marijuana while in Job Corps when it was legal outside of the program. Officials from the national Office of Job Corps said that state-level legalization of marijuana created confusion regarding Job Corps' drug policy and that non-residential students are sometimes exposed to its use off campus. At the time of our interviews in June and July 2022, two centers were located in a state where adult recreational marijuana use was legal under state law. In two states where recreational use was not legal, center officials said that some students at their centers come from states in which it is legal under state law.

Officials in four centers said that relaxed societal attitudes toward marijuana, including the normalization of marijuana use in students' homes and communities, presented a challenge to persuading students not to use the drug. For example, officials said some students used marijuana at home, as did their parents. One official shared an anecdote about a parent who dropped off a package for a student that included vaping supplies hidden in a box of crackers. Two officials said that students know adults in their communities who use marijuana while maintaining employment, leading them to question the extent to which drug use would affect their employability. In addition, officials in three centers said that students viewed marijuana use as "acceptable," or did not see it as a problem.

Conclusions

In addition to ensuring that students are safe and secure, Job Corps' role is to provide services that help students complete the program and improve their future career opportunities. Increasing rates of drug use are a growing concern for Job Corps and can decrease a student's chances of completing the program. A key part of center safety and security is preventing drugs from coming onto center campuses. However, DOL currently does not provide regional office staff responsible for reviewing and approving safety and security SOPs with written procedures to

ensure that they contain required protocols. As a result, reviewers approved documents missing required protocols. Without written procedures, DOL and regional office management lack reasonable assurance that regional office staff are approving safety and security SOPs that detect and deter the use of drugs.

Job Corps centers are required to provide students who test positive for drugs at entry with intervention services. However, centers are experiencing difficulties in recruiting and retaining qualified specialists responsible for providing students with these required services. Vacancies for this position can affect the implementation and effectiveness of intervention services. Yet, DOL has not assessed hiring flexibilities that could help centers address this issue. DOL grants year-long waivers to allow the hiring of specialists without the required certification. However, the agency does not collect and monitor data on recruiting TEAP specialists using waivers and retaining those who obtain certification to assess the effectiveness of waivers in successfully helping TEAP specialists obtain this certification. Without examining additional hiring flexibilities and collecting data on recruitment and retention to evaluate the effectiveness of waivers, centers may continue having challenges providing required intervention services to students who may ultimately not be able to complete the Job Corps program.

Recommendations for Executive Action

We are making the following three recommendations to ETA:

The Assistant Secretary of ETA should develop written procedures detailing the steps regional office staff need to take to review and approve Job Corps center safety and security standard operating procedures, including clarifying how to address situations in which the requirements relate to uncommon circumstances. (Recommendation 1).

The Assistant Secretary of ETA should assess actions the national Office of Job Corps can take to help centers address challenges with recruiting and retaining TEAP specialists, such as assessing possible changes to national policy that allow greater hiring flexibility. (Recommendation 2).

The Assistant Secretary of ETA should require the national Office of Job Corps to collect and monitor data on recruiting TEAP specialists using waivers and retaining those who obtain certification. (Recommendation 3).

Agency Comments

We provided a draft of this report to DOL for its review and comment. In its comments, reproduced in appendix II, DOL agreed with all three of our

recommendations, and discussed actions it planned to take to address them. In particular, DOL stated that its national Office of Job Corps will establish written procedures for the review and approval of center safety and security standard operating procedures. DOL also stated that its national Office of Job Corp will work to support centers in recruiting and retaining qualified TEAP specialists by encouraging center operators to offer competitive wages and assessing changes to current policy to increase hiring flexibilities. DOL also stated that its national Office of Job Corps will establish a set of procedures to collect and monitor data on recruiting and retaining TEAP specialists working under approved waivers. DOL provided additional comments as well as technical comments, which we incorporated as appropriate. We will monitor DOL's actions to determine whether they address our recommendations.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies to the appropriate congressional committees and the Secretary of Labor. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staffs have any questions about this report, please contact us at (202) 512-7215 or sawyerj@gao.gov, or (202) 512-6722 or arpj@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.



John D. Sawyer, Director
Education, Workforce, and Income Security



J. Howard Arp, Director
Forensic Audit and Investigative Services

Appendix I: Objectives, Scope, and Methodology

Overview

This report examines (1) the extent to which selected Job Corps centers' safety and security protocol documents included minimum requirements and followed required protocols to prevent drugs from entering their campuses, (2) what is known about the progress of students who test positive for drug use in the Job Corps program, (3) what support services Job Corps centers provide students who test positive for drug use, and (4) the perspectives of staff at selected centers about challenges they face in assisting students who test positive for drug use.

To address all of our objectives, we selected six Job Corps centers that included a range of positive drug test rates for students, center sizes, and locations. While our findings from these centers are not generalizable to all Job Corps centers, they provide context and illustrative examples of the kinds of issues Job Corps centers may face. We also reviewed relevant federal laws, regulations, agency policies and procedures, and past GAO and Department of Labor (DOL) Office of Inspector General (OIG) reports concerning safety and security issues at Job Corps centers. We collected feedback from students at each of the selected centers using an anonymous questionnaire. In addition, at each of the selected centers, we interviewed the center director, staff involved in providing intervention services to students testing positive for drugs, and safety and security staff. We also interviewed officials from the national Office of Job Corps and regional office directors covering the regions of the six selected centers in our review.

To address our first objective, we reviewed centers' most current safety and security standard operating procedures (SOP) and local law enforcement agreements to determine if they included required protocols identified in Job Corps' Policy and Requirements Handbook. In addition, during our audit work in the summer of 2022, our criminal investigators visited the center campuses to observe their entry security practices. We compared these practices with each center's SOP as they pertain to preventing drugs from entering campus. Between July and August 2022, we also administered a nongeneralizable anonymous questionnaire of enrolled students at the selected centers to gather their perspectives regarding drug use on campus.

To address our second objective, we matched data from DOL's lab testing contractor on the results of student drug tests with DOL student data, including data on program completion and safety and security incidents. We analyzed these data for students who enrolled in Job Corps in program year 2018 (July 1, 2018 through June 30, 2019). We selected this time period, in part, to ensure that students had enough time to

complete the program before Job Corps sent them home due to the COVID-19 pandemic in March 2020. We determined these data were sufficiently reliable for the purposes of our analysis.

For our third objective, we reviewed student health records for a random, nongeneralizable sample of students who enrolled in program year 2018 at the six selected centers and tested positive for drug use when they entered the program. On our questionnaire for enrolled students at the selected centers we asked for their perspectives regarding intervention services. For each of the selected centers, we also reviewed the regional office health and wellness program compliance assessments for findings on the centers' Trainee Employee Assistance Program (TEAP). The assessments we reviewed were conducted in program years 2017 and 2018 and were the most recent at the time of our review.

Lastly, for our fourth objective, we interviewed DOL and center officials on the challenges they face in assisting students who test positive for drug use. We also reviewed DOL's data collection efforts and interviewed agency officials related to key staffing challenges. We compared this information to leading practices for staff recruitment and retention¹ and federal internal controls related to quality information.²

The following sections contain detailed information about the scope and methodology for this report.

Selection of Job Corps Centers for Review

We selected six Job Corps centers representing a range of positive drug test rates for students, variation in center size, and in different locations across four Job Corps regions (Boston, Chicago, Dallas, and Philadelphia).³ To select these centers, we analyzed data on the number of students who tested positive for drugs after receiving intervention services to identify and select a mix of centers with high, low, and

¹GAO, *State Department: Additional Actions Needed to Address IT Workforce Challenges*, [GAO-22-105932](#) (Washington, D.C.: July 12, 2022). In this report, we developed leading practices based on our analysis of workforce-related areas and practices identified in federal Office of Personnel Management guidance and our prior work

²GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

³We used data on center size for program year 2021. While program year 2021 enrollment levels were low due to the drop in enrollment because of the COVID-19 pandemic, we used 2021 to help us ensure sufficient student size at centers selected for our audit work, such as our onsite observations.

midrange positive test rates. We used data DOL provided from its nationally contracted lab on drug test data publicly reported by DOL for program year 2018,⁴ the most recent year of data available before centers sent students home due to the COVID-19 pandemic.⁵

Safety and Security Operating Procedures

To determine the extent to which selected Job Corps centers' safety and security protocol documents included minimum requirements, we compared the six selected centers' SOPs and law enforcement agreements to select requirements of Job Corps' Policy and Requirements Handbook. To do this, we reviewed the handbook to identify the required procedures for centers to address in their safety and security SOPs and law enforcement agreements.⁶ We limited the scope of our review to security procedures related to preventing drugs from entering campus. For example, we did not include required elements related to weapons or stolen property. For each of the six centers, we requested the most current (as of May 2022 when we made our request) SOPs and law enforcement agreements. We developed a data collection instrument to review these documents against the requirements described in the Policy and Requirements Handbook to determine whether each center met each requirement.

Observations of Entry Security Screening Practices

To determine the extent to which selected Job Corps centers followed required protocols for preventing drugs from entering their campus, we also conducted onsite observations during June through August of 2022. Specifically, for each of the six centers, our criminal investigators observed how center security staff screened students and other entrants to their campuses to see if the practice aligned with the center's safety and security SOPs related to entry security screening procedures. In order to determine when to conduct the observations, we gathered information from each center about the day(s) of the week and times of day that the center has the highest volume of student returning to campus. However, centers' restrictions on students leaving the center due to COVID-19 may have affected the number of observations. The number of pedestrian and vehicle entries observed across the centers

⁴DOL, Job Corps Health, Wellness, and Disability Report: Review of Selected Health and Disability Indicators Program Year 2018 (Nov. 2019)

⁵Most students were sent home or to other designated locations. Some centers stayed open to provide housing and meals for students who had nowhere to go.

⁶Because law enforcement is not required to enter into agreements with centers, centers may not be able to establish an agreement or an agreement that completely addresses all requirements listed in the Job Corps' Policy and Requirements Handbook for processing illegal drugs.

ranged from three to 41. While our investigators were onsite, they also conducted an interview with a security officer for each center to gather perspectives on security at the center.

Data Analysis on the Progress of Students through the Job Corps Program

To examine what is known about the progress of students who test positive for drug use in the Job Corps program, we matched data from DOL's Job Corps Career Development Services System (CDSS) with the agency's national drug testing lab contractor. CDSS is a suite of applications, including the two data systems we used: the Center Information System and the Significant Incident Reporting System. Student data in each system are linked using unique student identification numbers, and Job Corps center staff input data on a rolling basis.

The CDSS Center Information System is the principle source of student records, according to DOL officials. We analyzed variables including the dates students enrolled in and separated from the program, reasons students separated from the program (e.g., disciplinary action, unauthorized absence, or medical reason), and program completion (i.e., earning a high school diploma or high school equivalency credential, completing a career technical training program, or both).

The CDSS Significant Incident Reporting System contains safety and security incident reports related to student conduct, among other information. Centers must report incidents involving Job Corps students and staff, including identifying whether each student or staff was a victim or perpetrator. Additional incidents are reported in the Significant Incident Reporting System that did not involve student perpetrators, but we did not include these incidents in our analysis. We analyzed variables regarding serious safety and security incidents for which centers recorded students as the perpetrators (e.g., assault, drug-related incidents, and breach of security/safety). The incident categories in this report are taken directly from DOL documents and represent how DOL categorizes these incidents. We reported incident types according to the primary incident type that was assigned to each incident. Incidents may also have secondary and tertiary types.

We also analyzed student drug test results data from DOL's national drug testing lab contractor because DOL does not maintain data on student drug test results. We analyzed variables in the lab contractor data including the type of drug test (i.e., entry, follow-up, and based on

suspicion of drug use)⁷ and drug (i.e., tetrahydrocannabinol (THC)—the mind-altering chemical in marijuana—amphetamines, cocaine, opiates, PCP, barbiturates, benzodiazepines, fentanyl, hydrocodone, and oxycodone).

To identify students who tested positive for drug use, we matched the CDSS and lab contractor data using unique student identification numbers that are recorded in both data sources. We were unable to match drug test results for students whose identification numbers were missing from, or incorrectly entered in, the lab contractor data.⁸

We also excluded (1) students for whom we could not locate entry test result records; (2) students with positive test results recorded for both the follow-up test and a test administered based on suspicion of drug use; (3) students with positive entry test results for whom we could not locate follow-up test result records if the student separated after 45 days following the entry test, which is after the follow-up test is required to take place; and (4) students with follow-up tests recorded who also tested positive for a test administered based on suspicion of drug use within 45 days. We excluded a total of 2,940 students, comprising 6.3 percent of the 46,964 students who enrolled in program year 2018. After excluding these individuals, our population of analysis was 44,024 students.

We analyzed these data for students who enrolled in Job Corps in program year 2018 (July 1, 2018 through June 30, 2019). We selected this time period for two reasons. First, program year 2018 was the most recent program year when the majority of students had enough time to complete the program before Job Corps sent them home due to COVID-19 on March 16, 2020 during program year 2019.⁹ We conducted a preliminary analysis to determine whether students who enrolled in program year 2018 had completed or separated from the Job Corps

⁷Job Corps centers are required to test new students for drug use within 48 hours of their entry at a Job Corps center. Students who test positive take a follow-up test 37 to 40 days later. A center must also test a student at any time for drug use if center officials reasonably suspect that drugs have been used.

⁸DOL officials said that recording student identification numbers with drug test results used to be voluntary on the part of the lab contractor and centers, but they began requiring it in 2022.

⁹Most students were sent home or to other designated locations. Some centers stayed open to provide housing and meals for students who had nowhere to go. Throughout the COVID-19 pandemic, drug testing was on hold until students resumed on-site participation at a center.

program before Job Corps centers sent students home. We reviewed separation dates and found that about 86 percent of students had separated by March 16, 2020 and by September 2022, all but 20 students had separated.

Second, program year 2018 was the most recent complete program year when DOL's lab contractor recorded student identification numbers with drug testing data, allowing us to match lab contract data with DOL's CDSS data. In December 2019, DOL began contracting with a new lab contractor, which did not record student identification numbers. In November 2022, DOL began requiring the lab contractor and centers to record student identification numbers with drug testing data.

To examine the progress of students who enrolled in program year 2018, we analyzed CDSS data regarding these students from July 1, 2018 through September 2022, when we received the data. We analyzed the entry and follow-up drug test results data for students who enrolled in program year 2018. We also analyzed results of drug tests that Job Corps administered based on reasonable suspicion that a student had used drugs that occurred during program year 2018. Although centers may administer drug tests at any time during a student's enrollment when there is reasonable suspicion that the student is using drugs, starting in December 2019 DOL's new national drug test lab contractor did not record student identification numbers. Consequently, we were not able to match lab data from program year 2019 through program year 2021 to the CDSS data.

To assess the reliability of DOL's CDSS data, we reviewed available agency documentation about the data and systems that produced them. We also conducted a series of interviews with knowledgeable DOL officials about how the data are inputted, maintained, and reviewed for accuracy. We determined that CDSS data are sufficiently reliable for the purposes of describing what is known about the progress of students through the Job Corps program.

To assess the reliability of DOL's national drug testing lab contractor data, we interviewed knowledgeable agency officials and reviewed their written responses to data reliability questions. Because DOL does not maintain data on student drug testing results, and DOL changed to a new lab contractor in December 2019, limited documentation was available. DOL officials said the unique student identification numbers were not consistently and accurately recorded with the lab contractor data.

To determine if the lab contractor data are sufficiently reliable for the purpose of identifying students' drug test results and matching them with the CDSS data, we conducted electronic data testing to identify any missing or illogical data (such as alphabet letters appearing in student identification numbers and dates that did not align with our knowledge of the program, e.g., the sequence and timing of entry and follow-up drug tests). We determined that the lab data were sufficiently reliable for our purpose of identifying the drug test results for most students who enrolled in program year 2018. Due to the limitations of the data, we excluded 2,940 out of 46,964 students, as described above. We ran descriptive statistics on demographic characteristics between students who (1) could and (2) could not be matched, to determine if there were any large differences. We did not find any large differences, signifying that the students we report on most likely have equal demographic characteristics as the students we excluded. However, because there is a possibility that the students we excluded differ from the students we did not on some characteristic that we did not measure, we reported population totals using a margin of error that displays the range of possible values from the minimum possible value to the 95th percentile.

Nongeneralizable Anonymous Student Questionnaire

In order to inform our work across engagement objectives, we administered an online anonymous questionnaire to enrolled Job Corps students at the six selected Job Corps centers included in our review. We pretested a draft of the questionnaire with three students at one Job Corps center, and we refined the questionnaire based on information gathered from the pretest. We also had our instrument peer reviewed by an independent GAO survey specialist and made modifications based upon their recommendations prior to launching the questionnaire.

The topics of the questionnaire included respondents' use of and satisfaction with TEAP-provided intervention services, and satisfaction with the steps their center takes to prevent drugs from entering campus. We also included open-ended questions for respondents to provide comments about what worked well and did not work well about the TEAP-provided services, and to provide an opportunity to comment on anything else they wanted to share about drug use on campus at their Job Corps center. We conducted a content analysis of three open-ended questions. To do this, we reviewed the open-ended responses and developed categories of responses based on this review. To determine the categories that reflected each response, we had two analysts independently review and assign a category to each open-ended response that best reflected the response. Each response could be assigned multiple categories. If the reviewers were unable to reach

agreement on the categories for a response, a third party reviewer weighed in.

We enlisted the assistance of the national Office of Job Corps and the six centers' directors to distribute an email on our behalf, including an anonymous link to the questionnaire, to all actively enrolled students at their respective sites between the dates of July 29, 2022 and August 4, 2022. We accepted questionnaire responses directly through our anonymous survey link until August 30, 2022. Student responses were submitted directly to us through our software. We received 349 completed responses affirming that the respondent met our criteria of being 18 years of age or older, and actively enrolled at one of the six centers. We cannot report a response rate due to the anonymous nature of our questionnaire, as it is possible that respondents may have submitted multiple responses, and we cannot confirm that all respondents met our criteria (students 18 years of age or older and actively enrolled at one of the six centers). We reviewed responses to identify any obvious or apparent duplicate entries and did not identify any such entries. The results are not generalizable to the six centers or to Job Corps centers nationwide, but do provide contextual information and illustrative examples of the perceptions held by students regarding their centers' efforts to keep drugs off their campuses.

Student Health Records

In order to identify the services provided to students who test positive for drug use on program entry, we collected and reviewed a nongeneralizable sample of student health records for students who enrolled in program year 2018 for each of the six selected Job Corps centers included in our engagement review. We requested and obtained from DOL, for each of the six centers, a list of student identification numbers for students who were given a follow-up drug test after testing positive to the initial drug test on program entry in program year 2018.¹⁰ Using these lists, we randomly selected 10 percent of these students for each center. For the list of selected students, we then requested and received from DOL student health records with personally identifiable information redacted. We reviewed components of the records that documented drug testing and described TEAP intervention services the students received between the initial and follow-up drug tests. We reviewed a total of 81 records, ranging from seven records to 28 records.

¹⁰The Policy and Requirements Handbook states that follow-up tests are administered 37 to 40 days after an initial drug test.

Law Enforcement Calls for Service

To inform our work related to determining the extent to which selected Job Corps centers followed required protocols for preventing drugs from entering their campus, we gathered information on law enforcement calls for service during program year 2021. Specifically, for each of the six selected Job Corps centers included in our review, our criminal investigators requested from local or state law enforcement, records of calls for service from July 1, 2021 through July 31, 2022. Our investigators reviewed these call logs to identify the extent to which drug-related calls were reported regarding the centers.

TEAP Specialist Vacancies and Waivers

We reviewed voluntary, self-reported survey data submitted by centers to DOL on their staffing levels for TEAP specialists for program year 2016 to 2021. The survey was intended to be completed by center directors or health and wellness managers, and captures staffing levels at a snapshot in time of TEAP staffing levels when the survey is completed. We determined not to use this information for program year 2016 to 2020 because the nonresponse rates ranged from between 29.8 and 41.6 percent.

We used the program year 2021 survey results, which had a nonresponse rate was 4.1 percent, since DOL began taking additional steps to require centers to report information on staffing levels. We assessed the reliability of the data by interviewing DOL officials to learn how centers submitted the data and analyzing the data for potential errors. We cleaned the data, including removing duplicate entries. After completing these steps, we determined it was sufficiently reliable for our purposes.

We also analyzed information provided by DOL on waivers of TEAP specialist qualifications requirements for program year 2016 to 2021. DOL's national health support contractor reviews all waiver requests submitted by centers, and provides waiver recommendations to the national Office of Job Corps to make the final decision. Because aggregate data on waivers are not maintained by the national and regional offices, for our review, DOL's national health support contractor compiled lists of waivers it recommended for approval per center per year. We reviewed the lists of centers for each year to check for any obvious errors including duplicates in each year's list. We identified one duplicate entry and removed it from our analysis. The information provided by DOL are limited because (1) they are not final waiver decisions and (2) they may be missing some waiver recommendations because all records may not be readily accessible to DOL. DOL officials told us that while they are not certain, the information provided most likely

may be an undercount of final waiver decisions. Although these data are limited, we determined it was sufficiently reliable for our purposes of presenting summary level information on recommendations for waivers provided by the national health support contractor. We analyzed this information to provide a national aggregate summary of centers with recommendations for waivers by year and across consecutive years.

We conducted this performance audit from January 2022 to July 2023 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. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. We conducted our related investigative work in accordance with investigation standards prescribed by the Council of the Inspectors General on Integrity and Efficiency.

Appendix II: Comments from the Department of Labor

U.S. Department of Labor

Employment and Training Administration
200 Constitution Avenue, N.W.
Washington, D.C. 20210



June 23, 2023

John D. Sawyer
Director
Education, Workforce, and Income Security
U.S. Government Accountability Office
441 G St. N.W.
Washington, DC 20548

J. Howard Arp
Director
Forensic Audit and Investigative Services
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RE: Job Corps: DOL Could Improve Center Safety and Security Procedures and Assess Hiring Flexibilities for Drug Intervention Specialists (GAO-23-105589)

Dear Director Sawyer and Director Arp:

The U.S. Department of Labor (Department) appreciates the information, analysis, and insights that the U.S. Government Accountability Office (GAO) has shared in this Report. The safety, security, and wellness of Job Corps students is a top priority for the Department. The Department raises two areas for GAO's consideration. These considerations are also reflected in the technical comments the Department provided regarding the Report.

First, the Department disagrees with the statement that the youth entering Job Corps have higher rates of drug use than youth nationwide. Job Corps is required by statute to drug test all students upon enrollment. Thus, Job Corps' data is determined by laboratory results of drug testing and includes all enrolled students. In contrast, national surveys on youth drug use are based on self-reported data of sample sizes by age group. Self-reported data does not involve the level of rigor of laboratory-based drug testing and is more likely to be influenced by underreporting bias. Thus, the Department does not draw the conclusion that drug use among Job Corps students is necessarily higher than drug use among youth nationwide. Regardless, the Department remains committed to continuing its efforts to limit the impact of nationwide drug use among youth in the Job Corps program, including by providing youth entering Job Corps with services through the Trainee Employee Assistance Program (TEAP), which provides both drug prevention and drug education activities. Each Job Corps center employs TEAP specialists to facilitate the program with an overall goal of ensuring students are prepared to enter the workforce drug-free and able to secure and maintain gainful employment.

Second, the Department is concerned about the language on page 2 of the draft report referencing the Office of the Inspector General (OIG) report's statements that center staff characterized students as having "significant" substance abuse issues and attributed program disruptions and

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safety issues to students “with substance abuse or mental health issues.” Without supporting data or further context, these statements are both inaccurate and stigmatizing to students who may suffer from substance abuse disorders or mental health conditions, and the Department’s response to the OIG report articulates such concerns. The Department respectfully requests striking these two sentences as they are not material to GAO’s recommendations, which the Department accepts as discussed below.

In the first recommendation of the report, GAO recommends:

The Assistant Secretary of ETA should develop written procedures detailing the steps regional office staff need to take to review and approve Job Corps center safety and security standard operating procedures, including clarifying how to address situations in which the requirements relate to uncommon circumstances.

The Department agrees with GAO’s first recommendation. The Office of Job Corps (OJC) will establish written procedures for the review and approval of center safety and security standard operating procedures.

In the second recommendation of the report, GAO recommends:

The Assistant Secretary of ETA should assess actions the national Office of Job Corps can take to help centers address challenges with recruiting and retaining TEAP specialists, such as assessing possible changes to national policy that allow greater hiring flexibility.

The Department agrees with GAO’s second recommendation. The Department acknowledges center operators’ challenges to recruit and retain qualified personnel for several positions, including TEAP specialists. One of the challenges to recruiting and retaining qualified personnel is providing competitive wages; center operators that do not pay competitive wages cannot retain qualified staff for open vacancies, including TEAP specialists. The OJC will continue to advocate for budgetary increases and encourage center operators to offer competitive wages. Additionally, the program is assessing revisions to the Job Corps Policy and Requirements Handbook (PRH) that would provide greater hiring flexibility.

In the third recommendation of the report, GAO recommends:

The Assistant Secretary of ETA should require the National Office of Job Corps to collect and monitor data on recruiting TEAP specialists using waivers and retaining those who obtain certification.

The Department agrees with GAO’s third recommendation. The Department agrees OJC should collect and monitor data on recruiting and retaining TEAP specialists who are working under an approved waiver. OJC will establish a set of procedures to conduct these tasks.

Again, we appreciate the information, analysis, and insights GAO provided to help reach our shared goals of improving safety and security procedures and addressing challenges with

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recruiting and retaining TEAP specialists. Thank you for sharing this information and for the opportunity to respond to this Report.

Sincerely,



Brent Parton
Acting Assistant Secretary

Appendix III: GAO Contacts and Staff Acknowledgments

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Related GAO Products

Job Corps: DOL Should Provide Greater Transparency in Communicating Its Rationale for Closure Decisions, [GAO-20-240R](#). Washington, D.C.: April 14, 2020.

Job Corps: Actions Needed to Improve Planning for Center Operation Contracts, [GAO-19-326](#). Washington, D.C.: August 8, 2019.

Job Corps: DOL Could Enhance Safety and Security at Centers with Consistent Monitoring and Comprehensive Planning, [GAO-18-482](#). Washington, D.C.: June 15, 2018.

Job Corps: Preliminary Observations on Student Safety and Security Data, [GAO-17-596T](#). Washington, D.C.: June 22, 2017.

Job Corps: Assessment of Internal Guidance Could Improve Communications with Contractors, [GAO-15-93](#). Washington, D.C.: January 22, 2015.

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