



# *REPORT TO THE CONGRESS*



087485

## **Selected Aspects Of Payments And Charges To Job Corps Members** B-130515

Department of Defense  
Office Of Economic Opportunity

*BY THE COMPTROLLER GENERAL  
OF THE UNITED STATES*

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COMPTROLLER GENERAL OF THE UNITED STATES  
WASHINGTON, D.C. 20548

B-130515

To the President of the Senate and the  
Speaker of the House of Representatives

This is our report on selected aspects of payments and charges to Job Corps members by the Office of Economic Opportunity Operations, Finance Center, U.S. Army, Indianapolis, Indiana, for the Office of Economic Opportunity.

The principal findings described in this report were included in our summary report on the "Review of Economic Opportunity Programs" (B-130515, March 18, 1969).

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53); the Accounting and Auditing Act of 1950 (31 U.S.C. 67); and contract clauses prescribed by the United States Code (41 U.S.C. 254(c)).

Copies of this report are being sent to the Director, Bureau of the Budget; the Secretary of Labor; the Secretary of Defense; the Secretary of the Army; and the Director, Office of Economic Opportunity.

Comptroller General  
of the United States

D I G E S T

WHY THE REVIEW WAS MADE

Under an interagency agreement, the Army Finance Center (OE00-FCUSA) in Indianapolis, Indiana, makes payments for the Job Corps to all corps members for various types of allowances. Because of the magnitude of the payments (\$105 million in calendar year 1967), the General Accounting Office (GAO) made a review to evaluate the adequacy of controls exercised by the Office of Economic Opportunity (OEO), the Job Corps centers, and OE00-FCUSA in administering the payment of these allowances and the offsetting advances. OE00-FCUSA was reimbursed by OEO in the amount of \$1.6 million for the cost of this operation for calendar year 1967.

The principal findings described in this report were included in the GAO summary report on the "Review of Economic Opportunity Programs" (B-130515, March 18, 1969), which was issued to the Congress pursuant to title II of the Economic Opportunity Amendments of 1967 (81 Stat. 727).

FINDINGS AND CONCLUSIONS

From a statistical sample, GAO estimated that in 1967 Job Corps centers did not report cash advances of about \$125,000 to OE00-FCUSA because of inadequate accounting controls. GAO estimated that, if the advances had been properly reported, about \$115,000 could have been deducted from separation payments. (See p. 9.)

About 5,600 terminated corps members reenroll annually. Over 50 percent of a sample test of 25 reenrollees had debts outstanding from prior enrollment in the Job Corps, but OEO instructions did not require collection upon readmittance and such prior indebtedness was not collected. (See p. 12.)

OEO's policy requiring recovery by the Job Corps centers of the unused portion of Government-furnished transportation or meal tickets was not being implemented; neither was OE00-FCUSA notified so that the amount due terminated corps members could be reduced by the value of the unreturned tickets. (See p. 13.)

Unexcused absences for which corps members were not entitled to allowances, were not properly reported to OE00-FCUSA. (See p. 15.)

Because of variations between the Job Corps requirements and center procedures and practices, centers did not treat enrollees equally (1) in the application of fines for absences without leave and (2) for the liability for loss or damage to Government property. (See p. 16.)

#### RECOMMENDATIONS OR SUGGESTIONS

GAO proposed that OEO conduct a study of all areas affecting corps members' allowances to establish a set of uniform policies and to develop adequate instructions and guidelines for use by center directors in establishing better control over advances and other amounts due or to be collected from corps members. (See p. 21.)

GAO recommends that the Director, OEO, make the necessary arrangements with the Department of the Army to have OEEO-FCUSA reconcile certain types of advances at least on a test basis. (See p. 23.)

#### AGENCY ACTION AND UNRESOLVED ISSUES

OEO and the Department of the Army, in commenting on the draft report, expressed general agreement with the GAO findings and proposals.

The Acting Deputy Director, OEO, advised GAO that an in-depth survey of pay and allowances had been conducted subsequent to August 1968; the Job Corps handbook on corps members' allowances and allotments was being revised to incorporate the GAO proposals; and increased surveillance at all levels of the Job Corps should achieve the desired controls in the area of pay and allowances. (See p. 27.)

The Assistant Secretary of the Army (Financial Management) advised GAO that OEEO-FCUSA would take certain actions to reconcile amounts claimed by the centers to reimburse their imprest funds with amounts advanced to corps members. (See p. 33.)

GAO believes that, if the actions being taken by OEO and OEEO-FCUSA are satisfactorily implemented, overall control over corps members' pay and allowances should be materially strengthened. However, GAO understands that OEEO-FCUSA does not plan to reconcile advances for bail bonds, legal fees, fines, living allowances, or readjustment allowances of \$15 or less. GAO believes that these types of advances should be reconciled at least on a test basis and has so recommended. (See p. 22.)

#### MATTERS FOR CONSIDERATION BY THE CONGRESS

The matters presented in this report are for consideration by the congressional committees having oversight responsibilities for federally assisted antipoverty programs. In view of the interest shown by members of the Congress in antipoverty programs generally, GAO is bringing its findings and observations to the attention of the Congress for general information purposes.

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## ABBREVIATIONS

AAA	Army Audit Agency
AWOL	Absent Without Leave
GAO	General Accounting Office
OEO	Office of Economic Opportunity
OEOO-FCUSA	Office of Economic Opportunity Operations, Finance Center, U.S. Army

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GAO believes that, if the actions being taken by OEO and OEEO-FCUSA are satisfactorily implemented, overall control over corps members' pay and allowances should be materially strengthened. However, GAO understands that OEEO-FCUSA does not plan to reconcile advances for bail bonds, legal fees, fines, living allowances, or readjustment allowances of \$15 or less. GAO believes that these types of advances should be reconciled at least on a test basis and has so recommended. (See p. 22.)

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## INTRODUCTION

The General Accounting Office has made a review of the financial controls exercised by the Office of Economic Opportunity; the Office of Economic Opportunity Operations, Finance Center, U.S. Army; and selected Job Corps centers' overpayments and charges to corps members of the Job Corps. The scope of our review is described on page 24.

OEO's written comments on our draft report were furnished on February 20, 1969, and are included as appendix I. The Department of the Army's written comments on our draft report were furnished on February 6, 1969, and are included as appendix II. We have noted in the appropriate sections of this report those comments that we consider appropriate to a clear understanding of the matters discussed herein.

The principal officials of OEO and the Department of Defense responsible for the administration of activities discussed in this report are listed in appendix III.

The Job Corps was established under title I, part A, of the Economic Opportunity Act of 1964 (42 U.S.C. 2701). The purpose of the Job Corps, as stated in title I of the act, is to prepare young men and women, aged 14 through 21, for the responsibilities of citizenship and to increase their employability by providing them with education; vocational training; and useful work experience, including work directed toward the conservation of natural resources; and other appropriate activities.

The Director of OEO is authorized to enter into agreements with any Federal, State, or local agency or private organization for the establishment and operation of training centers which in his judgment are needed to accomplish this purpose. He is authorized also to call upon other Federal agencies to supply information and materials as he deems necessary to discharge his responsibilities.

In December 1964, the Director of OEO requested the Secretary of the Army to provide financial services to OEO by maintaining and operating a system to pay Job Corps members the allowances to which they are entitled. The Secretary of the Army agreed to provide the requested services and in December 1964 established the Office of Economic Opportunity Operations within the Army Finance Center, Indianapolis, Indiana, for this purpose. The Secretary of the Army also agreed to disburse OEO funds for transportation services and meals furnished to corps members on the basis of transportation requests and meal tickets issued by OEO.

#### CORPS MEMBERS' ALLOWANCES AND BENEFITS

Corps members are entitled to:

Living allowances--Corps members are entitled to receive a regular monthly living allowance of \$30 and may be given incentive increases in \$5 increments up to a maximum total monthly allowance of \$50. Payments for corps members' living allowances are made semimonthly on the 15th and last day of each month. Living allowances are paid to corps members by checks prepared by OEOO-FCUSA and bulk-mailed to the centers for distribution.

Prior to April 1968, center directors were authorized to advance up to \$25 to newly recruited corps members to enable them to fill personal needs until they began receiving their regular living allowance checks. Effective April 1968, OEO reduced the maximum living allowance that could be advanced to a corps member to \$15.

Readjustment allowance--Prior to August 1967, readjustment allowances of \$50 a month for every month of satisfactory service were authorized to be paid to corps members when they terminated from the Job Corps if they had completed 90 days of service. One month's readjustment allowance could be forfeited by a corps member at the discretion of the center director if the corps member failed to remain at the center for orderly separation or if he was terminated for unsatisfactory service.

In August 1967, OEO changed its policy to provide that corps members who completed 90 days but less than 180 days would be entitled to a readjustment allowance of \$25 for each month of satisfactory participation in the program. Corps members who completed training, were forced to leave the Job Corps for reasons beyond their control, or remained in the Job Corps for 180 days or more would be entitled to a readjustment allowance of \$50 a month for each month of satisfactory service.

Effective April 15, 1968, OEO further revised its policy to provide that corps members who leave the Job Corps within 180 days will not be authorized readjustment allowances except in cases involving medical reasons, entrance into the Armed Forces, or graduation.

Allotments--Corps members can authorize the payment of up to \$25 a month of the readjustment allowance to designated allottees for the purpose of providing financial support to dependents while the corps members are in the Job Corps. The amount that corps members authorize to be paid from their readjustment allowance will be matched by an equal amount contributed from Job Corps funds.

Prior to February 1968, corps members could authorize an allotment for a spouse, child, or any relative or guardian who drew substantial support from the corps members. Effective February 1, 1968, OEO required that such allotments be paid to wives or children only. OEO estimated that under the revised policy only about 5 percent of new enrollees would be eligible for allotments, compared with about 82 percent of corps members who had allotments at the date of the change. Allotments in effect prior to February 1, 1968, were not affected and will continue to be paid until the corps members terminate.

Civilian clothing allowance--Center directors are authorized to issue a personal clothing allowance of \$75 if corpsmen complete 30 days' satisfactory service in the Job Corps and show a willingness to remain. When corpsmen complete 1 year of satisfactory service, they are entitled to a supplemental clothing allowance of \$30

to replace worn items of personal clothing. Corpswomen are entitled to an initial personal clothing allowance of \$140 and a supplemental personal clothing allowance of \$60 upon satisfactory completion of 1 year of service.

Government-issued clothing--Corps members are issued work clothing and dress uniforms in accordance with Tables of Allowances published by OEO.

Transportation--Corps members are entitled to transportation at Government expense from home to the initial training centers; between training centers; and upon termination or graduation, from training centers to homes or places of employment. Corps members are also entitled to transportation at Government expense for two home leaves during a 2-year enrollment in the Job Corps and for emergency leave without regard to the length of time they have been enrolled.

Bail bonds, fines, and legal fees--Center directors are authorized to pay bail bonds and fines imposed by civilian courts for corps members who become involved with law enforcement authorities. These payments made on behalf of corps members are chargeable to corps members' accounts. In addition, OEO provides legal representation to corps members who are faced with criminal proceedings. A standard rate of \$3 an hour for out-of-court time and \$5 an hour for in-court time, up to a maximum of \$50, is charged to corps members for the time an attorney spends on the case.

The responsibilities for administering the program to pay allowances and benefits to corps members are shared jointly by OEO, OEEO-FCUSA, and Job Corps center directors.

The principal responsibilities retained by OEO are to (1) develop and maintain a system of accounting and internal control designed to document all necessary facts and to fully support the Army personnel responsible for certifying and disbursing payments for OEO and (2) reimburse OEEO-FCUSA for the cost of furnishing the financial services.

The principal responsibilities assigned to OEEO-FCUSA are to (1) establish and maintain individual accounts for all corps members, (2) compute and pay living allowances, readjustment allowances, and allotments, (3) establish and maintain fiscal records for funds expended from OEO appropriations, and (4) compute and pay the final payment for corps members who terminate or are graduated from the Job Corps program.

Center directors are responsible for preparing documentation and furnishing data to OEEO-FCUSA to serve as a basis for OEEO-FCUSA to make payments to corps members and render accounting, disbursing and tax reports.

As of December 31, 1967, imprest funds had been established by the OEEO-FCUSA disbursing officer at the Job Corps conservation centers operated by Government agencies to make funds available to center directors for advance payment of living allowances to newly recruited corps members; for partial payments of readjustment allowances to corps members in advance of their graduation; and for civil fines, bail bonds, attorney fees, and miscellaneous expenses on behalf of corps members. Funds for similar purposes were provided on a reimbursable basis by contractors operating the men's and women's urban residential centers.

The imprest funds and contractor funds are replenished periodically by the OEEO-FCUSA disbursing officer based on vouchers submitted by the center directors showing evidence of payments made to or on behalf of corps members. During calendar year 1967, OEEO-FCUSA reimbursed about \$3.4 million to imprest fund cashiers and to contractors for advances made by them to corps members.

OEO procedures require center directors to report payments of civil fines, bail bonds, legal services, and other miscellaneous debts to OEEO-FCUSA at the time such payments are made so that OEEO-FCUSA can deduct these amounts from corps members' current allowances. OEO procedures also require center directors to report advances to corps members for living allowances and for

partial payments of readjustment allowances when corps members terminate their enrollment or graduate, so that OEEO-FCUSA may deduct these advances from amounts accrued to corps members, at the time of separation.

As of December 1968, OEO was administering six men's urban centers, 18 women's urban centers, 82 men's conservation centers, and three special centers for carrying out experimental projects. Job Corps enrollment is limited by law to 45,000, of which, by June 1968, 25 percent were to be women; enrollment, as of December 1968, was about 32,000 youths--about 22,400 males and 9,600 females.

Between January 1965 and December 31, 1967, OEEO-FCUSA disbursed about \$105 million for corps members' allowances and benefits. During the same period OEO reimbursed OEEO-FCUSA about \$1.6 million for its costs of providing the financial services.

## SELECTED ASPECTS OF PAYMENTS AND CHARGES

### TO JOB CORPS MEMBERS

Our review showed a need to improve financial controls over Job Corps allowances to avoid improper costs such as had been incurred by the Government because (1) payments were being made by OEEO-FCUSA without reduction for the amount of funds previously advanced, (2) procedures did not exist to recover prior outstanding indebtedness of terminated corps members later readmitted to Job Corps, (3) procedures were not being implemented to recover unused transportation and meal tickets from terminated corps members, and (4) absent without leave (AWOL) time for which corps members were not entitled to allowances was not being properly reported to OEEO-FCUSA.

Also, because of the lack of uniform requirements of Job Corps and of varying procedures among centers, not all corps members were receiving equal treatment in the application of fines for absences without official leave and for liability for loss or damage to Government property.

The Office of Economic Opportunity and the Department of the Army, in February 1969, expressed general agreement with our findings and proposals. Their comments on these matters are noted where appropriate in the body of this report and are presented in detail in appendixes I and II.

### NEED FOR ESTABLISHING BETTER ACCOUNTING CONTROLS OVER CASH ADVANCES TO CORPS MEMBERS

We estimate that during calendar year 1967 Job Corps centers did not report to OEEO-FCUSA cash advances of about \$125,000 because the centers had not established adequate accounting controls over such advances. We further estimate that OEEO-FCUSA could have recovered as much as \$115,000 of the \$125,000 by offset against the final payments due corps members had the centers properly reported the advances to OEEO-FCUSA.

In a statistical sample of advances amounting to about \$44,000 made to or on behalf of 1,340 corps members

during calendar year 1967, we found 70 instances where centers did not report or did not fully report to OEEO-FCUSA advances totaling about \$1,600. By projecting instances in our sample where advances were not reported or were not fully reported (\$1,600 of \$44,000) to the total advances of about \$3,400,000 made by the centers during calendar year 1967, we estimate that more than \$125,000 was not reported to OEEO-FCUSA.

Although our sample was limited to those youths who left the centers during calendar year 1967 and the total advances of \$3,400,000 were made to all youths, some of whom were still at the centers at the end of calendar year 1967, we believe that, because of the nature of the control weaknesses, those youths who were still at the centers would leave with similar uncollected advances. Also, we found that about \$1,500 of the \$1,600 could have been offset against monies otherwise due the corpsmen involved; and, on this basis, we estimate that about \$115,000 could have been offset against other monies due corps members at the time of separation had the center directors properly reported the advances.

A similar observation was made by the Army Audit Agency as a result of its review of OEEO-FCUSA activities for fiscal year 1967. (See p. 20.)

To determine the reasons why centers did not report or incorrectly reported some cash advances to OEEO-FCUSA, we selected four Job Corps centers for site review-- Kilmer, Atterbury, Eight Canyon, and Cispus.

By comparing imprest fund reimbursement vouchers with corps members' allowance records for the four centers, we found 86 additional cases of unreported advances amounting to about \$1,000. The four centers generally had not established accounting controls to ensure that the amounts reported to OEEO-FCUSA agreed with the amounts actually advanced to corps members. At the four centers, we discussed the situation with the center director who either took corrective action or promised that corrective action would be taken.

In commenting on this matter in February 1969, the Acting Deputy Director, OEO, and the Assistant Secretary of the Army (Financial Management) advised us that OEEO-FCUSA would take certain actions to reconcile amounts claimed by the centers to reimburse their imprest funds with amounts advanced to corps members. Officials at OEEO-FCUSA told us that no reimbursements to the centers would be withheld but that, if errors were noted in the comparisons, data on unreported items identified by OEEO-FCUSA would be forwarded to Job Corps headquarters officials for their action.

We were further advised by officials of OEEO-FCUSA, however, that only advances of readjustment allowances that exceeded \$15 would be compared by OEEO-FCUSA with the amounts reported by the Job Corps centers; comparisons would not be made for advances of bail bonds, legal fees, fines, or living allowances in any amounts. Although advances of readjustment allowances generally exceed \$15, other advances do not. We believe that comparisons of reimbursements with the other types of advances should be made, at least on a test basis, regardless of the dollar amount involved.

COLLECTION OF PRIOR INDEBTEDNESS OF  
REENROLLEES

OEO instructions pertaining to corps members' allowances did not require center directors or OEEO-FCUSA to collect prior indebtedness of readmitted enrollees.

We reviewed the records of the 25 corps members who were readmitted to the Atterbury Job Corps Center during November and December 1967. Fourteen of the 25 corps members who reenrolled during this period had outstanding indebtedness amounting to \$658.18 in connection with their earlier enrollment. Because OEO had not issued instructions for offsetting such debts against amounts due corps members for the current enrollment, neither OEEO-FCUSA nor the Center took action to collect the amounts due the Government.

In view of the fact that about 5,600 discharged corps members reenroll in Job Corps annually and there are indications that many may be indebted to the Government from their prior enrollment, we concluded that OEO should establish procedures for offsetting during the reenrollment period the prior debts against the corps members' allowances.

In commenting on this matter, the Acting Deputy Director, OEO, stated that in November 1968 OEO directed the centers to notify OEEO-FCUSA when a corps member is reenrolled so that the OEEO-FCUSA may effect collection of any outstanding indebtedness incurred in previous enrollment through offset from the corps member's allowance.

Under the above procedures OEEO-FCUSA must rely upon the center's advice that the corps member has previously been in Job Corps. In March 1969 we discussed with the Director, OEEO-FCUSA, the possibility that it might be more feasible to identify corps members who have previously been in Job Corps by using the information available at OEEO-FCUSA. The Director stated that he would conduct a study of reenrollee cases to determine the problems that would be involved in making such

identifications as well as whether or not such procedure would be economically feasible.

OEO INSTRUCTIONS REQUIRING CENTERS  
TO RECOVER ALL UNUSED TRANSPORTATION  
AND MEAL TICKETS, TO BE IMPLEMENTED

OEO's policy requiring OEOO-FCUSA or the Job Corps centers to recover the unused portion of Government-furnished transportation or meal tickets from corps members when they are terminated for being AWOL while in leave status, or to reduce the amount due terminated corps members for the value of such unreturned tickets, was not being followed.

Job Corps policy permits corps members to be absent from the centers, as necessary, in the interest of health, morale, and welfare. Each corps member earns leave at the rate of two calendar days for each complete calendar month of satisfactory service, for a total of 24 calendar days of leave a year.

A corps member is entitled to a maximum of two home leaves, with transportation furnished at Government expense, during a 2-year enrollment in the Job Corps. Additionally, corps members may be authorized emergency leave with transportation furnished at Government expense without regard to the length of time they have been enrolled. Generally, corps members travel on carrier tickets obtained with Government transportation requests.

The Transportation Division, Finance Center, U.S. Army, is responsible for paying carriers for the cost of tickets on the basis of the original Government transportation request submitted by the carrier for payment. The value of unused carrier tickets forwarded to the Transportation Division is deducted from carrier billings. Consequently, it is important that travelers return unused tickets so that the Government will not pay for transportation that carriers have not provided.

In addition to transportation tickets, meal tickets are issued to corps members to obtain meals while traveling between the centers and their home cities or places

of employment. Restaurants that furnish meals to corps members bill the Transportation Division, Finance Center, U.S. Army.

We examined the records of all 27 corps members who were terminated during January and February 1968 for being AWOL while on home leave from the Kilmer and Atterbury men's centers and from Eight Canyon and Cispus conservation centers and who had been furnished meal tickets and transportation at Government expense for the round-trip travel between the centers and their homes. As of June 30, 1968, only four carrier tickets, valued at about \$93, furnished to these corps members for the return trip had been processed by the Transportation Division for refund, and apparently these had been voluntarily returned to the centers by the corps members. We were unable to find evidence that the remaining 23 carrier tickets, valued at about \$768, or the meal tickets intended to provide the corps members with meals on the return trip had been returned to the center for cancellation. None of the four centers had made an effort to recover the return portion of carriers' tickets or the meal tickets issued to corps members.

However, at Eight Canyon, we did find that the loss resulting from the nonuse of return transportation tickets was of concern to OEO. In a memorandum dated July 17, 1967, the Regional Administrator of the Job Corps, Southwest Regional Office, suggested that certain procedures be instituted at Eight Canyon to recover unused transportation tickets or to deduct the cost of any tickets not returned from the corps members' final pay. The suggested procedures, however, were not being followed.

In commenting on this matter, the Acting Deputy Director, OEO, advised us that, to reinforce OEO's policy, a memorandum dated December 10, 1968, was issued to all OEO Regional Administrators on this subject and that follow-up action was continuing by the Job Corps Transportation Branch to ensure more effective compliance with the policy.

ALL UNEXCUSED ABSENCES TO BE  
REPORTED TO FINANCE CENTER

Our review at the centers revealed that the Atterbury and Kilmer men's centers were reporting all periods of AWOL time to OEEO-FCUSA so that appropriate deductions from the corps members' current or final pay could be made but that Eight Canyon and Cispus conservation centers were not reporting certain unexcused absences to OEEO-FCUSA.

OEO instructions required center directors to notify OEEO-FCUSA by teletype on the day following the 7th day of an AWOL period so that OEEO-FCUSA could suspend the corps member's allowances. OEO instructions also required that corps members' allowances be forfeited for every day of unexcused absence; however, center directors, at their discretion, were permitted to excuse unauthorized absences of less than 7 days, and there was no specific requirement that unexcused absences of less than 7 days were to be reported to OEEO-FCUSA. OEO instructions further provided that corps members were to be terminated after 15 cumulative days of AWOL.

A review of the records at Cispus disclosed that 19 corpsmen had been AWOL during the month of March 1968. For these 19 corpsmen, there were 11 instances of AWOL for 7 consecutive days or more and nine instances of AWOL for 6 days or less. One corpsman was AWOL twice during the month. The 11 instances of AWOL periods for 7 days or more were correctly reported to OEEO-FCUSA. However, in none of the nine instances of AWOL periods of less than 7 days had the AWOL periods been excused or reported to OEEO-FCUSA. We discussed this matter with Center officials in May 1968, who subsequently advised OEEO-FCUSA of the AWOL periods for eight of the corps members. The other corps member had terminated from the Job Corps and an adjustment could not be made in his account. The Center director told us that procedures would be revised so that in the future AWOL time of corpsmen would be properly reported to OEEO-FCUSA.

At Eight Canyon, Center management had unexplainably failed to report unexcused absences to OEEO-FCUSA. After our review started, Center management began to report such periods of AWOL to OEEO-FCUSA.

In commenting on this matter, the Acting Deputy Director, OEO, advised us that OEO's policy was being revised to revoke the authority of center directors to excuse any unauthorized corps members' absences and to require any and all such absences for periods over 24 hours to be reported to OEEO-FCUSA beginning the first day of absence.

#### UNIFORM REQUIREMENTS FOR CHARGING FINES AND PENALTIES, TO BE APPLIED

We found that variations existed between Job Corps requirements and center procedures and practices for charging fines to corpsmen for AWOL time and for loss or damage of Government property. In our opinion there is a need for Job Corps to ensure compliance to a uniform policy at all centers so that equal treatment will be given to all corps members.

#### Fines for AWOL time

In July 1967, the Director of Job Corps Men's Centers established a policy at men's centers which required that, in addition to forfeiture of allowances, corps members be fined for each period of AWOL. The Directors of Women's Centers and Men's Conservation Centers had not established a similar policy.

Under this policy the Atterbury Center fined corps members \$1 for each day of AWOL, and in some cases the fines exceeded the \$5 a pay period (semi-monthly) limitation on fines prescribed by Job Corps. The Kilmer Center was not levying fines for AWOL. We discussed this matter with the Kilmer Center director who told us that he was unaware that AWOL corpsmen were not being charged a fine. On June 6, 1968, the Kilmer Center director issued instructions to require that corpsmen be charged a fine of

\$1 a day for each day of AWOL not to exceed \$5 a pay period.

In commenting on this matter, the Acting Deputy Director, OEO, informed us that in January 1969 OEO advised all directors of men's centers that the requirement that corpsmen be fined \$1 for each day of AWOL had been rescinded, the fine system was now uniform throughout the Job Corps, the \$5 limitation on fines per pay period would still apply, and the system would be monitored by the project managers or appropriate agencies.

Loss or damage of Government property

Job Corps stated policy provides that corps members may be held financially liable for the loss, damage, destruction, sale, or wrongful disposition of Government property, including Government-issued clothing. However, the practices followed by center directors for charging corps members for loss or damage of Government property varied among centers.

With respect to loss of or damage to Government property, other than Government-issued clothing, Kilmer and Cispus did not hold corpsmen liable for the cost of damaged property, although at Atterbury and Eight Canyon, corps members were charged for the cost of damaged property in some cases, and in other cases, due to what appeared to be an administrative oversight, corps members were not charged.

Job Corps instructions provide that a periodic inventory be taken of all Government-issued clothing in the possession of corps members and that, in view of Job Corps aims to guide and instruct, penalties for losing clothing be applied with restraint. The policy in the Job Corps Conservation Center Administrative Manual states that, because corps members have a right to privacy, no "showdown" inspections will be conducted except to check the condition of Government property or to check property in connection with search and seizure.

The contractor at Atterbury conducted regular monthly inspections of issued clothing in possession of corpsmen. These inspections were made for the purpose of issuing clothing to those corpsmen who did not have the amount of clothing required by the OEO Table of Allowances and of taking clothing from corpsmen who had more than that amount issued to them. Atterbury procedures required that corpsmen who had not retained all the clothing issued to them be charged the depreciated value of the missing clothing. Atterbury did not uniformly follow the requirement and was unable to explain to us why corps members were charged in some cases and not in others.

At Cispus, Kilmer, and Eight Canyon, periodic inspections of clothing issued to corpsmen were not made; consequently, the question of corpsmen's liability for missing clothing did not arise. An official at Cispus told us that no periodic inspections of clothing issued to corpsmen were being made because he thought that the policy was that no such inspection should be made at conservation centers. Center officials at Kilmer told us that they had no procedures which called for such inspections.

Job Corps procedures provide that corps members who leave the program before completing 180 days of service or a prescribed course of instruction must turn in clothing charged to them, with the exception of a few personal items, and that the corps members are liable for the depreciated value of the clothing they do not turn in.

None of the four centers was consistently charging corps members for missing clothing after they had been discharged from the Job Corps for being AWOL. For example, we found, from the records of 17 corpsmen who terminated at Cispus in March 1968, that six corpsmen, who had not completed 180 days of service or a prescribed course, had clothing shortages which had not been reported to OEEO-FCUSA so that the depreciated value of the missing clothing could be offset against the final pay of the corps members.

In commenting on this matter, the Acting Deputy Director, OEO, advised us that corps members would be held financially liable (when and for how much being at the discretion of the center directors) for the negligent loss, damage, or willful disposition of Government property, including clothing, and that center evaluation teams would emphasize this subject in all future center evaluations.

OEO ACTION ON ARMY AUDIT THAT REVEALED  
OVERPAYMENTS TO CORPSMEN

The Army Audit Agency (AAA) conducted a review of OEEO-FCUSA operations in 1967, covering transactions in fiscal year 1967, in accordance with an agreement between Job Corps and AAA. Under the agreement AAA confined its review to the activity at OEEO-FCUSA and did not verify whether the data submitted by the centers was complete or correct.

AAA found that corps members had outstanding debts for (1) unrecouped advances of living allowances, (2) allotment overpayments, (3) charges for Government property lost or damaged, and (4) unrecouped fines, legal fees, and bail bonds.

AAA determined that the principal reasons that the overpayments occurred were that Job Corps centers did not promptly notify OEEO-FCUSA when corps members terminated from the Job Corps so that OEEO-FCUSA could discontinue the corps members' allowances and that OEEO-FCUSA procedures to offset outstanding amounts due corps members against amounts due the Government were inadequate.

AAA determined also that a substantial amount of overpayments to allottees could have been avoided if the centers had promptly notified OEEO-FCUSA when corps members terminated so that allotment payments could be discontinued.

As a result of AAA's review, Job Corps revised its procedures to provide that center directors notify OEEO-FCUSA by means of a teletype message on the day following the day corps members terminate or are granted administrative leave without pay and on the day following the 7th day of AWOL (however, see p. 16 regarding OEO's revised procedure), in order that OEEO-FCUSA may suspend payment of corps members' allowances and allotments. OEEO-FCUSA also revised its procedures to provide that, when notified by the centers of any monies owed by corps members, including the Government's contributions to

allottees for periods when the corps members did not perform satisfactory service, OEEO-FCUSA may offset monies in this amount against any monies due the corps members. A Job Corps member is said to have had satisfactory service if he has not been terminated from Job Corps as a result of a disciplinary discharge, AWOL separation, or failure to remain for orderly separation processing.

In addition, Job Corps, in April 1968, made changes in some of its policies with respect to corps members' benefits, which seem likely to reduce the number and amounts of debts owed by terminated corps members. The reduction of the maximum advance of living allowances from the \$25 to \$15 that center directors may advance to new corps members should tend to reduce the amount of uncollectible advances. Also, the restrictions, effective February 1968, against authorizing allotments, except to wives and children, would tend to reduce the number of allotment overpayments.

#### CONCLUSIONS AND AGENCY ACTION

Subsequent to the review by AAA, Job Corps took a number of actions to reduce the instances and magnitude of overpayments to corps members. Our review of Job Corps terminations processed by OEEO-FCUSA in May 1968 showed a reduction in the percentage of corps members who terminated without repaying debts to the Government compared with the percentage noted by AAA in its report. However, because Job Corps instructions to the centers were not clear, did not provide uniform policies, or did not cover some important areas, center directors had not established nor followed adequate procedures to ensure that costs to the Government were minimized or that corps members were uniformly treated. Therefore, we proposed to the Director, OEO, that he conduct an in-depth study of corps members' allowances, in order to establish uniform policies, and to provide a comprehensive set of instructions directed toward rendering assistance to center directors in managing the day-to-day activities relating to corps members' allowances, which cover all areas of corps members' benefits.

In a letter dated February 20, 1969, the Acting Deputy Director, OEO, advised us that an in-depth survey of the pay and allowances area had been conducted subsequent to August 1968; that the Job Corps handbook on corps members' allowances and allotments was being revised to incorporate our proposals; that increased surveillance at all levels of the Job Corps should achieve the desired controls in the areas of pay and allowances; that all center directors had been informed of the need for strict compliance with policies and procedures in these areas; and that emphasis would be placed on the adequacy of controls by center evaluation teams in all future evaluations.

In commenting on this matter in February 1969, the Assistant Secretary of the Army (Financial Management) advised us that OEEO-FCUSA would take certain actions to reconcile amounts claimed by the centers to reimburse their imprest funds with amounts advanced to corps members. Also, according to officials at OEEO-FCUSA, no reimbursements to the centers are to be withheld but, if errors are noted in the comparisons, data on unreported items identified by OEEO-FCUSA are to be forwarded to Job Corps headquarters officials for their action.

We believe that, if actions being taken by OEO are satisfactorily implemented, controls over corps members' pay and allowances should be materially strengthened. However, we were advised by officials at OEEO-FCUSA that only advances of readjustment allowances that exceed \$15 would be compared by OEEO-FCUSA with the amounts reported by the Job Corps centers. Comparisons would not be made for advances of bail bonds, legal fees, fines, or living allowances in any amounts. Although advances of readjustment allowances generally exceed \$15, other advances do not. We believe that comparisons of reimbursements with the other types of advances should be made, at least on a test basis, regardless of the dollar amount involved.

## RECOMMENDATION

We recommend that the Director, OEO, make the necessary arrangements with the Department of the Army to have the OEOO-FCUSA expand control over advances to corps members for bail bonds, legal fees, fines, and living allowances.

## SCOPE OF REVIEW

Our review, which covered in general the period January 1967 to June 1968, was directed primarily toward evaluating the manner in which OEO discharged its responsibility to establish and maintain adequate financial controls over payments of corps members' living and readjustment allowances and other benefits and the accuracy of final settlement of corps members' accounts. Our review covered the related procedures, controls, and operating methods at OEEO-FCUSA, Indianapolis, Indiana, and at four selected Job Corps centers--Atterbury Job Corps Center, Edinburg, Indiana; Kilmer Job Corps Center, Edison, New Jersey; Eight Canyon Job Corps Conservation Center, Mescalero, New Mexico; and Cispus Job Corps Conservation Center, Randle, Washington, and a report and supporting documentation by AAA on its review of the OEEO-FCUSA operations.

**APPENDIXES**

OFFICE OF ECONOMIC  
**OPPORTUNITY**

EXECUTIVE OFFICE OF THE PRESIDENT  
WASHINGTON, D.C. 20506

FEB 20 1969

Mr. Henry Eschwege  
Associate Director  
Civil Division  
U.S. General Accounting Office  
Washington, D.C. 20548

Dear Mr. Eschwege:

We have reviewed the comments contained in the GAO draft report to Congress dated November 29, 1968.

The Job Corps concurs with the findings and recommendation contained in the report [See GAO note].

On Page 10 - of the report a summary of the findings showed a need to improve financial controls in five (5) areas:

- " (1) Payments were being made by OEEO-FCUSA without reducing such payments for the amount of funds previously advanced.
- (2) Procedures did not exist to recover prior and still outstanding indebtedness of terminated corpsmembers later readmitted to Job Corps.
- (3) Procedures [See GAO note] to recover unused transportation and meal tickets from terminated corpsmembers, and
- (4) AWOL time for which corpsmembers are not entitled to allowances was not properly reported to OEEO-FCUSA.
- (5) We also found that because of the lack of uniform requirements by Job Corps and varying procedures among centers, not all corpsmembers were receiving equal treatment in applying fines for absences without official leave and for liability for loss or damage to Government property. "

On Page 24, a recommendation was made to conduct a study of all areas affecting corpsmember allowances.

GAO note: Deleted comments relate to a matter discussed in the draft report but omitted from this report.

Job Corps comments, based on the GAO findings and recommendations are as follows:

Page 11 - Need for additional instructions and establishment of better accounting controls over cash advances to corpsmembers. We concur. OEEO-FCUSA has commenced key punching all JC Form 20's (Voucher for Allocation for Living Allowances and Partial Payment of Readjustment Allowances) and the JC Form 58 (Receipt for Cash Payment). Both forms are source documents supporting SF 1129 (Reimbursement Voucher) submitted by the Center Director to OEEO-FCUSA for reimbursement of advances made out to the Imprest Fund. These key punched cards will be compared with the JC Form 12 or 13 itemizing amounts advanced for deduction from the Corpsmember's pay account. Reimbursement to the Center will not be authorized until these financial documents assessing the Corpsmember for the amounts advanced are processed by the Finance Center. In this way positive control at the OEEO-FCUSA is possible to:

- (1) Effect deductions in the Corpsmember's pay account prior to reimbursement of the Center Imprest Fund.
- (2) Emphasize the Center Director's responsibility for insuring the timely submission and propriety of all financial documents submitted to the OEEO-FCUSA.
- (3) Monitor the types of Imprest Fund expenditures being authorized at the Centers.

The Director, Job Corps, issued TWX's Cite 0822 dated 6 November (Attachment #1)<sup>1</sup> and Cite 0951 dated 26 November 1968 (Attachment #2) informing all Center Directors of their financial liability for incorrectly failing to report financial data.

The JC Form 13 (Notice of Termination) has been revised incorporating additional information requirements for key punching and eliminating interpretive type answers with "yes" or "no" responses and multiple choice boxes to check (Attachment #3).

The JCH 630 (Corpsman Allowances and Allotments Handbook) is being revised for distribution in February to include a provision that JC Forms 12 (Job Corps Allowance and Allotments Change Notice) submitted within 7 days prior to a termination must be referred to by transmittal Letter No. on the JC Form 13 Terminating a Corpsmember. This insures all JC Forms 12 are processed prior to closing out pay accounts.

Staff, Regional, and Center training in the allowances and allotments area is in progress.

<sup>1</sup>GAO note: This and other referred to attachments have not been included in this report because of their extensive length.

Page 13 - OEO instructions should require collection of prior indebtedness of re-enrollees. We concur. Job Corps Headquarters issued a TWX subject "Cross Check of Readmitted Corpsmember's Pay Accounts" Cite 0797 dated 1 November 1968 (Attachment #4) directing Center Directors to annotate the JC Form 27 (Job Corps Initial Allowance Authorization) that the Enrollee is a readmittee when applicable. Instructions were issued in Job Corps Screening Bulletin #69-13 dated December 2, 1968. (Attachment #5) OEOO-FCUSA has been directed to effect immediate collection from the corpsmember's living allowance of any outstanding indebtedness incurred in a previous enrollment. (See Attachment #6).

Page 13 - [See GAO note] recover all unused transportation and Meal tickets. [See GAO note]  
Job Corps does concur with the recommendation. Policy has been promulgated, implementation of the policy has not been effectively monitored. Job Corps transportation Handbook (JCH 640) and its initial version identified as Technical Manual No. 640-1 were distributed to all Job Corps Regional Office Transportation Units and Job Corps Centers issuing transportation requests and meal tickets. There were two issues of TM #640-1 and two issues of JCH 640 (Attachment #7). Promulgated policy states that Center Directors will communicate to corpsmembers to return unused tickets. If the corpsmember fails to return unused tickets, the Center Director, prior to terminating the corpsmember, will notify OEOO-FCUSA of the cost of such tickets to be deducted from the corpsmember's final living and readjustment allowances.

To reinforce this policy, an Associate Director memorandum, same subject, dated December 10, 1968, was issued to all Regional Administrators. This memorandum quotes areas of each publication where reference is made concerning recovery of all unused transportation tickets, transportation request, and meal tickets (Attachment #8). It is believed that instructions on the subject are sufficient.

Follow-up action is continuing by the Job Corps Transportation Branch to insure more effective compliance with the provisions of this manual.

Page 16 - Need to report all unexcused AWOL time to OEOO-FCUSA. We concur. The Center Directors instructions to wait for 7 days prior to submitting a JC Form 12 TWX and his authority to excuse unauthorized absences for any or all periods of less than 7 days is being revoked. The revised JCH 630 (Corpsmen Allowances and Allotment Handbook) stipulates that a JC Form 12 TWX will be prepared for any and all absences for periods over 24 hours to be effective beginning with the first day of absence. Project managers and agencies of conservation centers are required to monitor and evaluate adherence to this policy.

GAO note: Deleted comments relate to a matter discussed in the draft report but omitted from this report.

Page 18 - Need for uniform requirements for charging fines and penalties.  
We Concur. Fines for AWOL - Policy pertaining to fines (Center Director Imposed) has been promulgated through Job Corps Bulletins issued by appropriate Center Associate Directors and by JCH 630, Corpsman Allowances and Allotments (Attachments 9, 10 and 11). Associate Directors through project managers or appropriate agencies are required to implement and monitor the fine system. The Associate Director for Men's Centers has rescinded the policy requiring Men's Center Directors to fine corpsmembers \$1.00 for each AWOL. (Attachment #12). The fine system is now uniform throughout the Job Corps.

Liability for loss or damage of Government property, including issue clothing: Job Corpsmen are held financially liable for the willful or negligent loss, damage, sale or willful disposition of Government property, including issue clothing, in accordance with provisions of Section 670 of the CCCAM (Attachment #13). Departments of the Interior and Agriculture Supplements to the CCCAM and Agriculture Supplements to the CCCAM (Attachments 14 and 15) specify policies and procedures to be carried out at Conservation Center level. In all cases involving financial liability in excess of fifty dollars, a copy of the report of investigation, with a statement of the amount assessed, is required to be forwarded to the Director, Enrollee Support Division, for review. The cost of replacement for Government property lost or damaged shall be entered on JC Form 12 or 13 in accordance with paragraph 15f, JCH 630 (Corpsmen Allowances and Allotment Handbook). Center evaluation teams and Project Managers will emphasize this subject in all future Center evaluations.

Increased effort is being made to ensure that all Centers implement operating procedures governing financial liabilities of corpsmembers for lost, stolen or damaged Government property.

Issue clothing is provided to new enrollees in limited quantities in accordance with immediate requirements. The balance is issued after sufficient time has elapsed to compensate for any rapid changes in weight and also to allow the enrollee to determine if he desires to remain in the program. A periodic inventory is required to be taken of all government clothing in the possession of the corpsmen (Attachment 16). Corpsmen will be held financially liable for the willful or negligent loss, damage, sale or wrongful disposition of issued clothing taking cognizance of current depreciated value. The cost of replacement will be reported to the OEOO-FCUSA for deduction from living and readjustment allowances in accordance with the provisions of paragraph 15 of the Corpsmen Allowances and Allotments Handbook (JCH 630).

As with penalties for losses, damages, and/or destruction of other Government property, the decision on charges for government issue clothing has also been at the discretion of the Center Directors, both as to "when" and "how much" depending on the circumstances.

Page 21 - Need to improve financial controls over Job Corps allowances to avoid increased costs such as have been incurred by the Government. We concur. A Survey in-depth of the pay and allowances area has been conducted since August 1968. Cost effectiveness measures including policy and procedural changes have been implemented to establish more efficient financial controls.

To effect immediate corrective measures, all Center Directors and Regional Administrators have been informed of the need for strict compliance with current pay and allowance policies and procedures.

The revised JCH 630 incorporating the recommendations of the General Accounting Office and increased surveillance at all levels of the Job Corps in the areas of pay and allowances should achieve the desired financial controls. Emphasis on this subject will be placed by Center Evaluation Teams and Project Managers in all future center evaluations.

[See GAO note.]

Sincerely,



Robert Perrin  
Acting Deputy Director

GAO note: Deleted comments refer to a matter discussed in the draft report but omitted from this report.



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY  
WASHINGTON, D.C. 20310

6 FEB 1969

Mr. Charles M. Bailey  
Director, Defense Division  
United States General Accounting Office  
Washington, D. C. 20548

Dear Mr. Bailey:

The Secretary of Defense has asked me to comment on the GAO Draft Report dated 4 December 1968, subject "Need to Improve Controls Over Payments and Charges to Job Corps Members." (OSD Case #2859)

The Army is in agreement with the recommendation contained in the report. Of the five findings and conclusions in the report, the Army can take corrective action only on the first finding as indicated in Inclosure 1. All other findings will require procedural changes on the part of the Office of Economic Opportunity before corrective action may be taken by the Army. We have initiated discussions with the Office of Economic Opportunity to the end that better accounting controls are developed and applied as recommended in your report.

Comments on each finding and conclusion are contained in Inclosure 1.

1 Incl  
as

Eugene M. Becker  
Assistant Secretary of the Army  
(Financial Management)

COMMENTS ON GAO DRAFT REPORT (OSD #2859)

<u>GAO FINDINGS</u>	<u>GAO CONCLUSIONS</u>	<u>COMMENTS</u>
1. Payments were being made by OEEO-FCUSA without reducing such payments for the amount of funds previously advanced.	Need for additional instructions and establishment of better accounting controls over cash advanced corpsmembers.	That portion of the GAO conclusion concerning additional instructions is an OEEO Headquarters responsibility. Establishment of better accounting controls is a joint FCUSA and OEEO Headquarters responsibility.  Procedures provide that the Job Corps Center Director will make a partial payment of the earned readjustment allowance to the enrollee upon graduation. FCUSA is advised on Job Corps Notice of Termination Form of the amount of the advance, which is deducted from the enrollee's final pay computed by FCUSA. The Job Corps Centers are reimbursed by FCUSA for the amount advanced to the enrollees.  FCUSA has not been verifying the amounts shown on the notice of termination forms prepared by the Job Corps Centers with the amounts shown on the requests for reimbursement prepared by the Job Corps Centers; however, effective in January 1969 FCUSA will reconcile these payments on a sample basis based on availability of card punch man hours. All discrepancies will be referred to Job Corps Headquarters for collection from the contractors or imprest fund cashiers, as appropriate.
2. Procedures did not exist to recover prior and still outstanding indebtedness of terminated corpsmembers later readmitted to Job Corps.	OEEO should establish procedures to offset the prior debts against the corpsmembers' allowance earned during the re-enrollment period.	No action is contemplated by FCUSA. Job Corps Headquarters issued instructions to all Job Corps Centers 1 November 1968 that the JC Form 27 (Job Corps Initial Allowance Authorization) will be revised to show if the enrollee is a readmittance. If FCUSA is furnished this information, outstanding indebtedness resulting from a prior enrollment will be collected.

APPENDIX II  
Page 3

<u>GAO FINDINGS</u>	<u>GAO CONCLUSIONS</u>	<u>COMMENTS</u>
3. Procedures did not exist to recover unused transportation and meal tickets from terminated corpsmembers.	OEO instructions should require centers to recover all unused transportation and meal tickets.	No action is contemplated by FCUSA. Procedure for recovery of unused tickets from terminated members is outlined in OEO Transportation Handbook, dated November 1968.
4. AWOL time for which corpsmembers are not entitled to allowance was not properly reported to OEOO - FCUSA.	Need to report all unexcused AWOL time to OEOO - FCUSA.	No action is contemplated by FCUSA. Adjustments for periods of AWOL are made by FCUSA based on instructions received from the Job Corps Centers.
5. Not all corpsmembers were receiving equal treatment in applying fines for absences without official leave and for liability for loss or damage to Government property.	There is a need for Job Corps to establish specific uniform guidance to be followed at all centers in order to assure equitable treatment to corpsmembers.	No action is contemplated by FCUSA. Collections for fines and GPLD from enrollees are made by FCUSA based on instructions received from the Job Corps Centers.

PRINCIPAL OFFICIALS  
OF THE OFFICE OF ECONOMIC OPPORTUNITY  
AND THE DEPARTMENT OF DEFENSE  
RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES  
DISCUSSED IN THIS REPORT

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
DIRECTOR, OFFICE OF ECONOMIC OPPORTUNITY:		
Sargent Shriver	Oct. 1964	Mar. 1968
Bertrand M. Harding (acting)	Mar. 1968	May 1969
Donald Rumsfeld	May 1969	Present
DIRECTOR, JOB CORPS:		
Otis A. Singletary (note a)	Apr. 1965	Dec. 1965
Franklyn A. Johnson (note b)	Feb. 1966	Dec. 1966
William P. Kelly	Dec. 1966	Present
SECRETARY OF DEFENSE:		
Robert S. McNamara	Jan. 1961	Feb. 1968
Clark Clifford	Mar. 1968	Jan. 1969
Melvin R. Laird	Jan. 1969	Present
SECRETARY OF THE ARMY:		
Stephen Ailes	Jan. 1964	July 1965
Stanley R. Resor	July 1965	Present
COMMANDING GENERAL, FINANCE CENTER, U.S. ARMY:		
Brig. Gen. Lawrence B. Markey	Aug. 1964	July 1967
Col. John E. Kirk (acting)	Aug. 1967	Oct. 1967
Brig. Gen. Ralph J. Richards	Nov. 1967	Present

PRINCIPAL OFFICIALS  
OF THE OFFICE OF ECONOMIC OPPORTUNITY  
AND THE DEPARTMENT OF DEFENSE  
RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES  
DISCUSSED IN THIS REPORT (continued)

	<u>Tenure of office</u>	
	<u>From</u>	<u>To</u>
DIRECTOR, OFFICE OF ECONOMIC OPPORTUNITY OPERATIONS:		
Col. Shelton Gaddis	Dec. 1964	Aug. 1966
Michael J. Kirby (acting)	Sept. 1966	Dec. 1966
Clemens A. Voegtle (note c)	Dec. 1966	Present

<sup>a</sup>Served as a consultant to OEO from October 1964 until his appointment in April 1965.

<sup>b</sup>Served as a consultant to OEO from October 1965 until his appointment in February 1966.

<sup>c</sup>Served as acting director from December 18, 1966, to January 15, 1968.