

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
OMB No. 1205-0219**

A. Justification

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Response: The Job Corps is a major residential training and employment program administered by the Department of Labor (DOL) to address the multiple barriers to employment faced by disadvantaged youth throughout the United States. Job Corps is authorized by Title I, Subtitle C, of the Workforce Investment Act (WIA) of 1998. Implementing rules for the Job Corps are found at 20 CFR 670.

The Job Corps is an intensive, residential training program for economically challenged young people aged 16 to 24 who are out of school and out of work. Approximately 16 out of 20 students are residential. WIA provides that up to 20 percent of the individuals enrolled in the Job Corps may be nonresidential participants. The program is principally carried out through a nationwide network of 122 Job Corps centers. These are located at facilities either owned or leased by the Federal Government.

Job Corps is a unique employment and training program in a number of ways:

- a. Job Corps is primarily residential; the Department is responsible for the well being of students on a round-the-clock basis and provides students with food, clothing, medical care, legal services, and other support services in addition to academic education and vocational training.
- b. The Job Corps is mandated as a distinct national program (see Section 143 of WIA) and is not operated through intermediate government levels.
- c. Interested young people apply to join the program through a Job Corps Counselor. Section 145 of WIA describes the preferred outreach and eligibility admissions organizations and the process of enrolling individuals in the program.
- d. Job Corps enrollees are usually assigned to centers as close to their home as possible.
- e. Job Corps enrollees are Federal employees for a number of specific purposes, including: Internal Revenue and Social Security purposes, Federal Workers Compensation, and tort claims.

f. Job Corps Centers are Federal facilities either owned or leased. Section 160(3)(B) of WIA, for example, authorizes the Secretary to expend funds for renting and renovating facilities.

g. Large and small corporations and nonprofit organizations are authorized to manage and operate the Job Corps Centers.

The DOL has a direct role in the operation of Job Corps, and does not serve as a pass-through agency for this program. Job Corps Centers are established by DOL and it is the responsibility of DOL to select operators for them. Of the 122 current centers, 28 are managed and operated by the Departments of Agriculture and the Interior through interagency agreements. These centers are located on Federal lands controlled by these two agencies.

The remaining 94 centers are managed and operated by contractors selected by DOL. Seven of these centers are operated by organizations on a noncompetitive basis. The remaining centers are operated by private organizations, including private for profit companies, procured through competitive procurements that are negotiated and conducted in accordance with the Federal Acquisition Regulations (FAR). Many of the current contractors operate more than one center.

In accordance with 5 CFR 1320, DOL is seeking approval for forms connected with the operation of the 94 contractor-operated Job Corps centers for DOL, including the standard request for proposals.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency had made of the information received from the current collection.

Response: a. The Standard Request for Proposals for the Operation of Job Corps centers (RFP) provides the Government's expectations to potential offerors for the development of proposals to operate Job Corps centers. The RFP was revised in 2005 as part of a continuous effort to incorporate the most recent provisions of the FAR. For example, appropriate sections of the RFP were updated in 2005 to incorporate requirements of the Central Contractor Registration database set forth in the FAR at 48 CFR Parts 1,2,4,13,32 and 52. The RFP was also revised in 2005 to include requirements of government-wide Online Reps a Certs Application. Both of these government-wide applications are designed and expected to shorten proposal submission requirements. A model of the RFP is found at <http://wdcs.doleta.gov/jobcorps>.

As with the current RFP and any new RFP, proposals developed by offerors in response to the RFP are evaluated by Federal staff in terms of technical factors and cost. These proposals serve as the principal basis for selection of a successful offeror.

b. Information Collection Activities Required of Job Corps Center contractors serve a number of purposes. The operation of the Job Corps program is such that many activities required of contractors must be coordinated with other organizations, both Federal and nonfederal. For example, Job Corp students receive allowance payments through a central system operated under a contract funded by the DOL.

Center operators are required to collect certain student information in order to coordinate payment of proper allowances for individual students. Further, certain aspects of the center's operation are not included in the base funding of the contract because they cannot be estimated in advance. These include major medical costs for students, unanticipated transportation costs for students, capital expenditures, equipment costs and the like. Coordination of these activities is required between the contractor and the Federal Government.

Most of the information collection requirements of Job Corps center operators stem directly from operational needs or are necessary to ensure compliance with Federal requirements and the terms of the contract. Statistical reports (e.g., student characteristics) are normally generated from data collected from an automated data system developed by the Federal Government, not by the contractors.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology; e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden;

Response: The Office of Job Corps has implemented an electronic information system called the Center Information System (CIS). The CIS is an automated application that collects information for managing the center (e.g. student enrollment, student accountability, student finance student transportation and the disposition of property.) Job Corps has automated all forms in this information collection: ETA-2110, 2181, 131A, 131B, 131C, 6-40, 6-61, and 3-28. Three are no longer used: ETA 2181A (Center Operations Budget section), ETA 6-125 (Job Corps Health Staff Activity), and ETA 6-128 (Job Corps Health Annual Service Cost). Their discontinuance has been determined to have a negligible effect on the overall burden estimates because, in practice, they were rarely used.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified to use for the purposes described in Item 2 above.

Response: Because Job Corps center contracts are cost-reimbursement, it is not in the interest of the Government, from a cost and efficiency standpoint,

to require any type of duplicate reporting. To this end also, DOL attempts to provide statistical reports directly from system generated data from CIS, rather than requiring intermediate levels of reporting. This allows the National Office of Job Corps to develop national/regional totals on student characteristics, as opposed to requiring Job Corps centers to aggregate student data at their intermediate level.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Response: Job Corps center operators are selected utilizing full and open competition and small business set aside procedures. However, the reporting requirements are the same for all Job Corps Center operators.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing them.

Response: For the standard RFP, less frequent information collection is not possible. Job Corps center contracts are competed every two to five years, depending upon, among other things, the performance of the incumbent. Contractual reporting requirements are designed to meet operations needs. Changes in frequency of information collection would have serious operational consequences.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:
 - requiring respondents to report information to the agency more often than quarterly;
 - requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentiality that is not supported by

authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Response: The Job Corps program is the largest-funded contract program in DOL. The program continues to be scrutinized by Congress, GAO, OIG and other Departmental entities. For the most part, Job Corps receives high “marks” as a result of these reviews. It is evident that continued monitoring of performance is necessary to sustain such high performance. The most efficient means of monitoring performance has proven to be through measured levels. Data is collected more than quarterly for three reports: the Center Financial Report (2110), the Center Operations Budget (2181), and the Property Inventory Transcription Report (3-28). As indicated earlier, DOL, and not intervening governmental levels, has direct responsibility for the well being of students. Section 159 of WIA, for example, provides in part that: “The Secretary shall establish procedures to ensure that each operator, and each service provider, maintains a financial management information system that will provide- (A) accurate, complete, and current disclosures of costs of Job Corps operations; and (B) sufficient data for the effective evaluation of activities carried out through the Job Corps program.” One major method of ensuring that this responsibility is carried out is by the timely review of detailed financial reports. These reports would immediately show, for example, whether the contractor is providing adequate subsistence levels for students. Consequently, these reports are required more frequently for this purpose, as well as to monitor the overall costs of the contract in terms of contract compliance and the timing of Federal incremental obligations to the contract.

The procedures require that after a contract is awarded, finalization and submission of a budget must be made within 10 days. A waiting period for submission of the budget would affect how contractors are paid for services rendered. All other reporting requirements are in compliance with 5 CFR 1320.5.

8. If applicable, provide a copy and identify the data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the

clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

Response: In accordance with the Paperwork Reduction Act of 1995, the public was given a sixty day opportunity to review and comment on this submission, which was published on January 30, 2009 (Vol. 74, p5680); no comments were received.

It is important to note that DOL maintains regular contact with the Job Corps centers and the center operators, and provides immediate assistance for problems through the office of its Business Analyst for the Job Corps Data Center, which is responsible for the collection of business rules and requirements for Job Corps systems.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Response: Other than the remuneration of contractors or grantees, Job Corps does not provide any payment or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Response: With regard to the proposals submitted in response to the RFP, confidentiality is discussed in FAR Provision 52.215-1 of the FAR, which is incorporated by reference, into the RFP. This provision reads in part:

"Offerors that include in their proposal data that they do not want to disclose to the public for any purpose, or used by the Government except for evaluation purposes, shall

(1) Mark the title page with the following legend: "This proposal or quotation includes data that shall not be disclosed outside the Government and shall not be duplicated, used, or disclosed--in whole or in part--for any purpose other than to evaluate this proposal or quotation. If, however, a contract is awarded to this offeror or quoter as a result of--or in connection with--the submission of this data, the Government shall have the right to duplicate, use, or disclose the data to the extent provided in the resulting contract. This restriction does not limit the Government's right to use information contained in this

data if it is obtained from another source without restriction. The data subject to this restriction are contained in sheets (insert numbers or other identification of sheets"); and

(b) Mark each sheet of data it wishes to restrict with the following legend: "Use or disclosure of data contained on this sheet is subject to the restriction on the title page of this proposal or quotation."

Further, confidentiality with regard to student social security numbers, student records, including student medical records, is covered in the Job Corps Policy and Requirements Handbook. The law authorizing this program provides for compliance with the Privacy Act in all its aspects. 20 CFR 670.965, Disclosure of Information, provides instructions as to how to handle the confidentiality of the information obtained on each student. In addition, a Privacy Act Notice is given and explained to each student, stating explicitly how the information is to be used, who has access and how it can be released and to whom. Therefore, the student is aware that data from Job Corps records may be disclosed to another agency or individual without the applicant's specific written consent. Students are not required to sign this form.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Response: There are no other questions of a possible "sensitive" nature other than what is addressed above.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.
- If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.

Response: See attached charts for the listing of forms, by number, number of respondents, and total burden hours. Further explanation of the burden hours is explained below.

The annual burden hours estimated for the preparation of the Standard Center Job Corps Request for Proposal submitted by new and experienced contractors is 15,300 hours.

Data collection for the Center Financial and the Center Operations Budget Reports is made more than quarterly, and is essential to ensure contractor financial compliance with contractual requirements and to ensure orderly operations of the program.

Required Activity	ETA Form No.	Number of Respondents	Submissions Per Year	Total Annual Submissions	Hours Per Submission	Total Burden Hours
Center Financial Report	2110	122	90 at 12/year 28 at 4/year	1240	1	1240
Center Operations Budget	2181	94	3	282	1	282
Total						1,522

Center staff enter data utilizing a personal computer that transmits the data electronically to a centralized database. From this database many management and performance reports are created.

Required Activity	ETA Form No.	Number of Respondents	Submissions Per Year	Total Annual Submissions	Hours Per Submission	Total Burden Hours

Disciplinary Discharge	6-131A	1500	1	1500	0.01875	25
Review Board Hearings	6-131B	1500	1	1500	0.01875	25
Rights to Appeal	6-131C	1500	1	1500	0.01875	25
Student Profile	6-40	1500	1	1500	0.01875	25
Notice of Termination	6-61	1500	1	1500	0.01875	25
Property Inventory	3-28	126	52	6552	0.0275 (3 minutes)	328
Transcription						
Total						477

Student personnel requirements such as: student payroll information, student training and education courses received, student leave, disciplinary actions and medical information are also collected in an electronic information system. The initial data entry is maintained in the national database and used for multiple reporting purposes, therefore reducing the need to enter the data more than once. The total burden associated with the input of data to data screens is 20,347 hours.

Major record keeping and operational forms listed below that pertain to student and facility administrative matters are provided in Portable Data Files or PDF forms. The total burden for processing these forms is 37,648 hours.

A total of 7,578 burden hours are estimated for the preparation of the Center Operating Plans listed below that are required for the operation of a Job Corps center.

Required Activity	ETA Form No.	Number of Respondents	Submissions Per Year	Total Annual Submissions	Hours Per Submission	Total Burden Hours
Center Operation Plan		90	1	90	30	2820
Maintenance		122	1	122	5	610
C/M Welfare		122	1	122	2	244
Annual VST		122	1	122	24	2928

Annual Staff Training		122	1	122	1	122
Energy Conservation		122	1	122	5	610
Outreach		122	1	122	2	244

Total 7,578

Total Estimated Burden: 62,525 hours.

a. Standard Job Corps Center Request for Proposals (RFP). During the development of the current instrument, center contractor staff indicated that about 300 hours is required for an experienced contractor to prepare a proposal for the operation of Job Corps center. They estimated that it would require a new offeror (i.e., an offeror which had not previously prepared a Job Corps center proposal) approximately 800 hours.

Historically, Job Corps averages contracting for 12 centers per year over a two-year period. However, depending on the number of options exercised, the number of new acquisitions can increase. Based on a current analysis of performance statistics of centers for option decisions, Job Corps expects to initiate nine new acquisitions per year for the next two years.

On the average four proposals will be received for each center RFP, three from experienced contractors and one from a new offeror. Consequently, the burden hours per RFP are estimated to be 900 (300 hours times three experienced contractors plus 800 hours for one inexperienced contractor per procurement) and the total annual burden hours are estimated to be 15,300 hours annually (nine procurements times 1,700 hours per procurement).

b. Job Corps Center Contractor Information Collection Requirements.

Federal requirements regarding contractor information collection activities fall into a number of generic categories. From a burden hour standpoint, burden has been minimized due to the implementation of an automated system, CIS, which has reduced burden to a minimal level by only requiring key entry by users for data that is already collected.

Information collection activity relates to student enrollment, education, vocational, employment and payroll matters. Other modules within the centralized database contain Portable Data Files (PDF) forms.

Record keeping requirements are contained in the Job Corps Policy and Requirements Handbook, and are incorporated by reference into the contract. The total estimated burden for all requirements is 62,525 reporting hours. This represents an increase of 363 hours from the last approved burden of 62,162 reporting hours. The total number of Job Corps Centers has increased from 118 Centers last reported to the current number of 122 Centers. Also, the Job Corps Centers operated by contractors have increased

from 90 last reported to the current number of 94. This has resulted in a net change in the total burden hours last approved from 62,162 to 62,525.

1. **Automated Data Collection:** (See Chart I). Data collection for the Center Financial Report (1,240 hrs.) and the Center Operations Budget (282 hrs.) is made more than quarterly, and is essential to ensure contractor financial compliance with contractual requirements and to ensure orderly operations of the program. Together these reports total 1,522 burden hours.
2. **Center Information Data Collection:** (See Chart II). Data previously collected on the following forms that relate to student behavior, including the results of disciplinary actions that were appealed by students and reviewed by a student review board, and the inventory of property, is now being collected in CIS from data input screens that electronically transmit the data to a centralized data base: Forms 6-131A, 6-131B, 6-131C, 6-40, 6-61 and 3-38. The burden hours associated with the input of data to the data screens is minimal with a total of 477 hours.
3. **PDF Forms:** (See Chart III). Major record keeping and operational forms related to student health and administrative matters are now provided in PDF format. Data for Forms 6-125, 6-128, 6-112, 6-135, 6-136,6-37, 6-39 and 6-38 is now entered on forms that can be downloaded in a PDF format. The total burden for processing these forms is 37,648 hours.
4. **Other Plans:** (Chart IV). The Center Operating plan that is prepared at the beginning of the contract is the major burden hour requirement totaling 2,800 hours. Approximately 4,778 burden hours are required to revise existing center operating plans, e.g., (Maintenance, C/M Welfare, Annual VST, Annual staff training, etc). A total of 7,578 burden hours are estimated for the preparation of plans required for the operation of a Job Corps center.

Burden hours:		62,525
a. Standard RFP	:	15,300
b. Automated Forms	:	1,522
c. Center Information Data Collection:		477
d. PDF Forms	:	37,648
e. Center Plans	:	7,578

The costs to contractors for accomplishing the record keeping requirements listed above is contracted and computed by the Federal government annually. While precise costs cannot be identified, based on past experience, the annual and related costs for contractor staff are estimated to be \$1,9109.16, which represents an average cost of \$28.00 per hour.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).
- The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.
 - If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

Response: There are no other costs.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

Response: The maintenance cost associated with the system is estimated to be \$2.7 million a year for hardware and software. Total burden

estimates are based on staff experience and consultation with center contractors.

15. Explain the reasons for any program changes or adjustments to reporting in Items 13 or 14 of the OMB Form 83-I.

Response: There are no program changes or adjustments to reporting. As stated in #3 above, although four forms - ETA 2181A, 6-125, 6-127 and 6-128 - are no longer needed, the reduction in burden has been *de minimus*.

16. For collections of information whose results will be published, outline plans for tabulation, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Response: There are no plans to publish.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Response: DOL has no problem with displaying the OMB-approved expiration date for the collection of this information. ETA will make notification of the new expiration date through a Job Corps Directive is attached.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission," of OMB 83-I.

Response: There are no exceptions.

B. Collection of Information Employing Statistical Methods

This request does not employ a statistical methodology.