SUPPORTING STATEMENT FOR

PAPERWORK REDUCTION ACT 1995 SUBMISSIONS

OMB No. 1205-0035

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.

   The ETA 678, Job Corps Placement and Assistance Record, is the only source of information about a student's training and subsequent placement in a job, further education or military service.

   The purpose of Job Corps is to train young people for the job market; the data collected on this form provides information as set forth in 20 CFR, Subpart A, Section 670.100.

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 has made of the information received from the current collection.

   The placement of Job Corps students is the primary responsibility of career transition agencies, using information from the form supplied by the Job Corps center. At placement, the career transition specialist completes the form, providing placement information. (20 CFR, Subpart G, Section 670.700, 670.710, 670.720, 670.730 and Section 670.110.) This information is used to evaluate whether the program meets its goals.

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.

   Since the last submission in 2007, the Office of Job Corps has refined its electronic information systems, called the Center Information System (CIS) and the Career Transition Service System (CTS). The CIS and CTS

applications are automated systems that collect information for managing center and placement information. The data is entered utilizing a personal computer that transmits the data electronically to a centralized database. From this database many management and performance reports are created. This process, while enhanced since implementation, has not changed the nature of the process or the burden hours required to complete the form.

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

   This is a basic source document which generates all placement information. No other such information is available at the time this document is prepared for each student separating from Job Corps. The purpose of the collection is to gather information about each student's placement outcome after separation from the program. Therefore, duplication does not occur.

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.

   This document does not involve small businesses or other entities.

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 burden.

   If this information is not collected, Job Corps cannot comply with regulations and measure program effectiveness.

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 secrets, 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.

This request is consistent with 5 CFR 1320. There is no such circumstance.

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.

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review and comment on

the Federal Register notice concerning this information collection, which was published August 20, 2010 (Volume 75, page 51484). No comments were received.

DOL maintains regular contact with the Job Corps centers and the center operators and Career Transition Services providers for discussions regarding this information collection.

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

   There are no payments 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.

    The law authorizing this program provides for compliance with the Privacy Act in all aspects (20 CFR 638.537, Disclosure of Information). This regulation provides instructions on how to handle information obtained on students. Additionally, the Job Corps Privacy Act Statement gives each student assurance of confidentiality by describing when the information may be used, who has access to it, and how it may be released.

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.

    Not applicable; the form does not ask subject questions.

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.

Respondent Burden: For the three years culminating in 2010, annualized, Job Corps estimates that this form was completed for 40,000 graduates, rather than for the previous estimate of 48,318.

Placement specialists processed the 40,000 forms in the course of individual meetings with the Job Corps graduates who are placed in specified settings annually.

ETA has assigned a value of $8.20 per hour, slightly above the current minimum wage, since the preponderance of graduates have some type of employment, for graduates' time in the completion of the form.

$8.20 x annual time burden of 4,953 hours = $40,615

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 to keep records for the government, or (4) as part of customary and usual business or private practices.

There are no additional 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.

The form is maintained electronically; therefore, there would be no printing cost. The Career Transition Services (CTS) Specialist completes the application electronically of all students who are placed in a job, military or an additional education or training environment for approximately 40,000 students. It would take them approximately 7.43 minutes to complete the form, and the CTS Specialist averages about $16.00 per hour 40,000 x 7.43(minutes) / 60 x $16 = $79,253.

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

    There are no program changes or adjustments; the slightly lower burden results from there being fewer program graduates during this three year submission period (annualized) compared with the previous submission.

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.

    This information is not collected for publication.

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.

    DOL displays the OMB-approved expiration date for the collection of this information.

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

    There are no exceptions.

B. Collection of Information Employing Statistical Methods

No statistical methods are employed.