

SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION

OMB No. 1205-0025

Job Corps Application Data
Information Collection Request

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: Job Corps is the nation's largest residential, educational, and career technical training program for young Americans. Job Corps was established in 1964 by the Economic Opportunity Act and is currently authorized by Title I-C of the Workforce Investment Act of 1998. For almost 50 years, Job Corps has helped prepare nearly three million at-risk young people between the ages of 16 and 24 for success in our nation's workforce. With 125 centers in 48 states, Puerto Rico, and the District of Columbia, Job Corps assists students across the nation in attaining academic credentials, including a High School Diploma (HSD) and/or General Educational Development (GED), and career technical training credentials, including industry-recognized certifications, state licensures, and pre-apprenticeship credentials.

Job Corps is a national program administered by the U.S. Department of Labor (DOL) through the Office of Job Corps and six Regional Offices. DOL awards and administers contracts for the recruiting and screening of new students, center operations, and the placement and transitional support of graduates and former enrollees. Large and small corporations and nonprofit organizations manage and operate 97 Job Corps centers under contractual agreements with DOL. These contract center operators are selected through a competitive procurement process that evaluates potential operators' technical expertise, proposed costs, past performance, and other factors, in accordance with the Competition in Contracting Act and the Federal Acquisition Regulations. The remaining 28 Job Corps centers, called Civilian Conservation Centers, are operated by the U.S. Department of Agriculture's Forest Service, via an interagency agreement. The DOL has a direct role in the operation of Job Corps, and does not serve as a pass-through agency for this program.

In accordance with 5 CFR 1320, DOL is seeking approval for forms connected with determining applicant basic eligibility for the Job Corps Program. These forms are the initial forms completed for each applicant. They also provide demographic characteristics for program planning, evaluating and reporting purposes. This activity, previously authorized by Title IV-B of the Job Training Partnership Act and currently authorized under the Title I, Subtitle C of the Workforce Investment Act of 1998, is the major responsibility of the Job Corps admissions counselor. The forms in this collection are:

ETA 652, Job Corps Data Sheet, ETA 655, Statement from Court or Other Agency, and ETA 682, Child Care Certification.

The ETA 652, Job Corps Data Sheet, is used to obtain information for screening and enrollment purposes to determine eligibility for the Job Corps program in accordance with the Workforce Investment Act. It is prepared by the admissions counselor for each applicant and has no further impact on the public. It is critical to the screening process. It also provides demographic characteristics for program planning and reporting purposes. Data for the form are collected by interview, generally at the admissions counselor's work site. The information obtained includes age, legal U.S. residency, family income/welfare status, school status, behavior history, parental consent and child care needs of each applicant.

The remainder of the form asks for basic information such as name and address, which are already on the ETA 652. This data continues to be collected electronically.

The ETA 655, Statement from Court or Other Agency, collects essential information for determining the suitability of an applicant to participate in the Job Corps program. It is used to document past behavior problems for all applicants, as well as provide a basis for projecting future behavior. It is collected by the Job Corps admissions counselor who requests the information from proper authorities. If it were not obtained, serious problems could result from enrolling potentially harmful or disruptive individuals in Job Corps, which is a residential program. This could have legal implications for the federal government.

The ETA 682, Child Care Certification, is used to certify an applicant's arrangements for dependent children while the applicant is in Job Corps.

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.

Response: Data for the screens are collected via interview by Job Corps Admissions Counselors, generally at the Admissions Counselor's work site. Documentation of behavioral background is obtained from appropriate courts, agencies, and/or institutions. The information gained from these forms is used to determine applicant's eligibility for the Job Corps program.

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 basis for the decision for adopting this means of collection.

Response: In order to comply with the Government Paperwork Elimination Act of 1998, Job Corps has reduced the paperwork burden by implementing an electronic system of application data collection for use in determining eligibility for the program. Admissions counselors enter data directly from information provided during interviews with applicants. Behavioral information is entered on the ETA 655 from courts and institutions that provide the information. These records are transmitted electronically to

the admissions contractor headquarters for quality control as required, to the appropriate Job Corps center to which applicant has been assigned, and to the Regional Office where appropriate. The database is located at the Job Corps Data Center in Austin, Texas. Further savings in burden are made by having demographic information, such as name and address, automatically printed on all forms where required, after the information is initially entered.

Student records have been consolidated into one database. This has provided a seamless record for each student from application through post-placement follow-up, and has effectively eliminated much duplication of data.

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.

Response: Due to the nature of the activity, duplication is minimal. One application must be completed for each person who applies to Job Corps. The forms have no cycle and are used only as the individual situation dictates (e.g., only applicants with dependent children must complete an ETA 682, Child Care Certification). Unless the legislation is changed, the frequency, nature, and use of this information will remain unchanged. In terms of duplication, once basic information (name and address) is entered, it is automatically carried to other forms, as appropriate.

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: Small businesses collect the data as part of their contract, but the information is gathered from individuals.

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.

Response: These are basic source documents. No other information is available at the time these documents are prepared. The information must be obtained to determine each applicant's eligibility to receive the benefits of Job Corps.

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 3 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: There are no such special circumstances.

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 recordkeeping, 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 three years – even if the collection of information activity is the same as in prior periods. Consultation with those who use this form is an ongoing process. Unless the laws are changed, the frequency of, the nature of, and the use to which this information is put, will remain unchanged.

Response: In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review and comment on this information collection by way of a *Federal Register* notice published on June 18, 2013 (Vol. 78, p. 36597). No comments were received.

It is important to note that DOL maintains regular contact with the Outreach and Admissions contractors, 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: There are no 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: The nature of the program requires that sensitive areas be addressed in order to gather information about each applicant's eligibility to receive Job Corps benefits. The Job Corps Privacy Act Statement is given to each applicant. It describes how the information will be used, who has access to it, and how it can be released. Some potentially sensitive items are included on the forms such as welfare status, race, annual income, and history of conviction or delinquency against persons or property. All of these, however, are part of the eligibility equation to determine need and suitability for admission to the program, as required by law. The information sought is essential to the well-being of the Job Corps program and is so mandated by legislation. The information is essential to making eligibility decisions on those applicants with known past behavior problems. Further, keeping information private regarding student social security numbers, and 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 keep the information private which is obtained on each student.

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 sensitive nature.

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 the chart below for the listing of forms, by number, number respondents, hours per submission, and total annual burden hours. Further explanation of the burden hours is explained below.

ETA Form No.	Total Number of Respondents	Frequency	Average Time Per Respondent	Total Burden Hours
Job Corps Application ETA 652	86,581	1/person	10 minutes	14,430
Statement from Court ETA 655	86,581	1/person	1 minute	1,443
Child Care Certification ETA 682	6,561	On occasion	3 minutes	328
Total	179,723			16,201

During PY 2011, 86,581 applicants completed applications for Job Corps. The total, as the chart above indicates, for the 3 forms is 16,201 burden hours. Based on the current minimum hourly wage of \$7.25, the cost to applicants is calculated at 16,201 x 7.25 for a total estimated annual participant cost of \$117,457.

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 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.

Response: The annual cost for contractor staff and related costs is estimated to be approximately \$704,889. There are no added federal costs.

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

Response: There were no program changes. However, the reduction in applicants accounted for reduced hours in #12. During PY 2011, 86,581 applicants completed applications for Job Corps. This number of applications is reduced from the PY2009 figure of 92,122 applicants in the previously approved ICR. The Department has also reconsidered its approach in counting the number of responses provided by each respondent and concluded that, while all forms may be filed at the same time, each form should be considered a separate response. These adjustments to the number of responses (from 92,122 to 179,723) do not affect burden time or other costs, except to the extent that there are fewer respondents. Also in #14 the previous submission inadvertently included the estimated opportunity costs to participants for filling out forms (\$.7.25) to the federal costs, which belongs only in #12. This has been addressed in the database and in supporting statement item current #14.

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: Much of the data from these collections (Forms 652 and 682) is aggregated into reports published on Job Corps' public website @ http://www.jobcorps.gov/AboutJobCorps/performance_planning.aspx, and for WIA required reports to congress.

There are no plans to publish data from ETA Form 655 (Statement from Court or Other Agency).

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: The expiration date is displayed.

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 that Employ Statistical Methods

Response: This collection does not employ statistical methods.