

**SUPPORTING STATEMENT FOR  
PAPERWORK REDUCTION ACT SUBMISSION  
OMB No. 1205-0035  
Job Corps Placement Record 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 currently is authorized by Title I-C of the Workforce Investment Act of 1998 (WIA). For nearly 50 years, Job Corps has helped prepare nearly 3 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 High School Equivalency credential, and career technical training, including industry-recognized credentials, state licensures, and pre-apprenticeship credentials.

Job Corps is a national program administered by the U.S. Department of Labor (DOL) through the National 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 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.

The ETA Form 678, Job Corps Placement Record, is the only source of information about a student's training and subsequent placement in a

job, further education or military service and is required for measuring program effectiveness (20 CFR Subpart A Section 670.100).

The purpose of Job Corps is to train young people for the job market; the data collected on this form provides the information required in the Workforce Investment Act in WIA Section 159, MANAGEMENT INFORMATION, item (c):

(c) Information on Indicators of Performance.--

(1) Establishment.--The Secretary shall, with continuity and consistency from year to year, establish indicators of performance, and expected levels of performance for Job Corps centers and the Job Corps program, relating to--

(A) the number of graduates and the rate of such graduation, analyzed by type of vocational training received through the Job Corps program and by whether the vocational training was provided by a local or national service provider;

(B) the number of graduates who entered unsubsidized employment related to the vocational training received through the Job Corps program and the number who entered unsubsidized employment not related to the vocational training received, analyzed by whether the vocational training was provided by a local or national service provider and by whether the placement in the employment was conducted by a local or national service provider;

(C) the average wage received by graduates who entered unsubsidized employment related to the vocational training received through the Job Corps program and the average wage received by graduates who entered unsubsidized employment unrelated to the vocational training received;

(D) the average wage received by graduates placed in unsubsidized employment after completion of the Job Corps program--

(i) on the first day of the employment;

(ii) 6 months after the first day of the employment; and

(iii) 12 months after the first day of the employment, analyzed by type of vocational training received through the Job Corps program;

(E) the number of graduates who entered unsubsidized employment and were retained in the unsubsidized employment—

- (i) 6 months after the first day of the employment; and
- (ii) 12 months after the first day of the employment;
- (F) the number of graduates who entered unsubsidized employment—
  - (i) for 32 hours per week or more;
  - (ii) for not less than 20 but less than 32 hours per week; and
  - (iii) for less than 20 hours per week;
- (G) the number of graduates who entered post-secondary education or advanced training programs, including apprenticeship programs, as appropriate; and
- (H) the number of graduates who attained job readiness and employment skills.

**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: The placement of Job Corps students is the primary responsibility of career transition services agencies, contractors. Data for the screens are collected via interview with applicants by career transition services personnel generally at their work site. Data generated from the ETA Form 678 is used to evaluate whether the program meets its goals. 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.)

**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.**

Response: 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.**

Response: 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 post-center 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 describe any methods used to minimize burden.**

Response: Small businesses or other small entities are not involved.

**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: If this information is not conducted, Job Corps cannot 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.**

Response: 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. 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 the Federal Register notice concerning this information collection, which was published August 7, 2013 (vol. 78, p 48197). 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. No concerns have been brought forward since the last three year cycle that would suggest changes to the collection instruments.

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

Response: 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.**

Response: The nature of the program requires that sensitive areas be addressed in order to gather information about each student's post-center placement to evaluate overall placement outcomes and process. The Job Corps Privacy Act Statement is given to each student. It describes how the information will be used, who has access to it, and how it can be released. Further, keeping information private regarding each student's record 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: Not applicable; the form does not ask 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.**
- **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: The burden hours are calculated for both the job corps graduates who are providing information on placements and for the intake counselors who process the information from the graduates.

Respondent Burden:

$$34,000 \text{ (total annual number of students)} \times 7.43 \text{ (minutes)} = 252,620 / 60 \text{ minutes} = 4,210 \text{ (burden hours)}$$

Because respondents are students, ETA has assigned a value of \$7.25 per hour (Federal minimum wage).  $\$7.25 \times 4,210 = \$30,522.50$ .

Because intake counselors are contractors for the federal government's job corps centers, which are contractor operated, their cost is included in Item 14 and not here.

**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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.**

Response: 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 34,000 students. It would take them approximately 7.43 minutes to complete the form, and the CTS Specialist cost averages \$28.00 per hour. Therefore,  $34,000$  (respondents)  $\times$   $7.43$ (minutes) /  $60$  (minutes) =  $4,210$  hours.  $4,210$  hours  $\times$   $\$28$  (per hour) =  $\$117,880$ . During FY2013, ETA has budgeted  $\$40,473,000$  to operate and maintain the Student Pay Allotment and Management Information System (SPAMIS). Including the subject ICR, this system supports

240,000,000 transactions annually. For administrative purposes therefore the cost allocated to this ICR is estimated to be \$5,733 (\$40,473,000 system cost times 34,000/240,000,000 transactions). Therefore \$117,880 + \$5,733 = \$123,613.

**15. Explain the reasons for any program changes or adjustments.**

Response:

There are no discretionary program changes. However, based on current enrollment trends, the previously approved estimate of 40,000 post placement graduates fell to 34,000 for the current submission, resulting in an adjustment of 6,000 fewer responses. In addition, as respondents are JC graduates, the burden hour equivalent cost estimate was adjusted to reflect the minimum wage rather than the contractor rate previously used. Finally, the cost burden figure in ROCIS was removed to address an inadvertent error at the time of the last 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.**

Response: The Office of Job Corps has implemented an electronic information system called the Center Information System (CIS), an automated application that collects information for managing the centers (e.g. student enrollment, student accountability, student finance, student transportation, and the disposition of property). DOL produces statistical reports directly from this data rather than requiring intermediate levels of reporting. National, regional and individual center performance management reports are developed on a monthly, quarterly and annual schedule, as opposed to requiring Job Corps centers to aggregate student data at their intermediate level. Much of the data from ETA Form 678 is aggregated into reports published on Job Corps' public website @ [http://www.jobcorps.gov/AboutJobCorps/performance\\_planning.aspx](http://www.jobcorps.gov/AboutJobCorps/performance_planning.aspx), and for WIA required reports to congress.

**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: Approval is not sought.

**18. Explain each exception to the certification statement.**

Response: There are no exceptions.

**B. Collection of Information that Employ Statistical Methods**

Response: This collection does not employ statistical methods