SUPPORTING STATEMENT
Placement Verification and Follow-up of Job Corps Participants: OMB CONTROL NO. 1205-0425, extension request without changes

A. JUSTIFICATION

This submission requests the extension of approval, without changes, for three primary and two secondary instruments used to collect follow-up data from former Job Corps participants. The current expiration date for this information collection is December 31, 2015.

Please note that once OMB approves this extension request, the Department will then submit to OMB a request for approval of revisions to this data collection as required by the Workforce Innovation and Opportunity Act of 2014 (WIOA).

The follow-up data is collected from the following groups of former Job Corps participants:

• Former enrollees (those who stayed in the program at least 60 days, but left before completing graduation requirements) who were placed in a job or school program; this group will be contacted 90 days after separation.

• Graduates who were placed in a job or school program; this group will be contacted 90 days after initial placement;

• Graduates who were placed in a job or school program; this group will be contacted 6 months after initial placement;

• Graduates who were placed in a job or school program; this group will be contacted 12 months after initial placement; or

The data collection instrument for graduates 90 to 120 days after their initial placement is called Interim Checkpoint for Eligibility (ICFE). Administration of the ICFE at this time facilitates the key data collection at 6 and 12 months. The rationale for conducting the ICFE is explained in further detail in Section A6 (Consequences of Less Frequent Data Collection). This submission also requests extension of the approval for two brief questionnaires (one for employers and one for schools or training institutions) used to collect re-verification data about initial placement for the subset of placed graduates and former enrollees who cannot be contacted directly.

To maximize the comparability of the data collected from the different subgroups of students, the ICFE, the 90-day follow-up for former enrollees, and the 6-month and 12-month follow-up sections of the data collection instruments use modules with identical sets of questions on the same topics. The questions are designed to obtain:

• Data to re-verify the initial job or school placements of placed graduates and information

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about employment experiences in the previous week;

• Information about educational experiences in the previous week;

• Summary information about the work, school, and job search activities of those who were neither working nor in school the previous week; and

• Information about satisfaction with the services provided by Job Corps.

Al. Circumstances Necessitating the Data Collection

Job Corps is the nation's largest and most comprehensive residential education and job training program for at-risk youths, ages 16 through 24. Job Corps participants are typically high school dropouts in need of further education and technical training. Most Job Corps participants live on campus, but at some centers, youths from local areas can commute to centers for training. As an open-entry, open-exit program, Job Corps admits and graduates students throughout the year.   Generally, these students are economically disadvantaged ethnic minorities who live in communities that do not foster favorable education or employment outcomes. Job Corps offers these youths academic and career technical training, social skills training, personal and career counseling, health care, and other supportive services.

During their Job Corps tenure, students can obtain their secondary school credential, learn a business or trade through the career technical training program, and participate in work-related training that is intended to make them marketable in jobs that pay a living wage. Students who obtain their high school diplomas (or equivalent), or complete their career technical training are considered program graduates.

Upon graduation from Job Corps, youths are prepared to pursue employment opportunities, additional educational and training experiences, or enter the armed forces. Career development specialists at Job Corps are responsible for assisting graduates and former enrollees (students who leave the program after 60 days without a credential and do not violate Job Corps' drug or violence policy) with finding a job or enrolling in a school or training program. Career development specialists also help students create resumes and prepare for interviews. Job Corps has enhanced its placement services to graduates by expanding the period of eligibility for placement services to 12 months after they leave the center, and by providing more intensive services through the Career Development Service System (CDSS). Former enrollees who leave Job Corps without a credential are eligible for up to 3 months of placement services upon termination from Job Corps.

The Workforce Investment Act (WIA) of 1998, which is Public Law 105-220, and reauthorized by WIOA, mandates additional reporting requirements for certain classes of Job Corps participants.

Sections 159c1(D), (E), (F), and (G) of the WIA legislation stipulate that the following information about graduates be provided:

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- Their average wage on the first day of employment, 6 months after the first day, and 12 months after the first day;
- The number who entered and remained in unsubsidized employment 6 months and 12 months after the first day of employment;
- The number of those employed 32 hours per week or more; those employed not less than 20 but fewer than 32 hours per week; and those employed fewer than 20 hours per week; and,
- The number who entered postsecondary or advanced training programs.

Section 159d of the Act mandates that the Job Corps collect and report to the Secretary of Labor specific information about the status of former enrollees. According to the WIA, the Office of Job Corps must provide information about the performance of each center and about the larger program with respect to the number of former enrollees who:

- Entered the armed forces;
- Entered postsecondary education;
- Entered unsubsidized employment related to the vocational training received through the Job Corps program;
- Entered unsubsidized employment not related to the vocational training received through the Job Corps program; and
- Received a secondary school diploma or its recognized equivalent.

Although the WIA allows for the placement of former enrollees by Job Corps, placement services are required only for students who graduate from the program. Section 159d of the legislation requires that the Job Corps provide job placement information about former enrollees who may have obtained jobs or admission to educational programs without the assistance of Job Corps.

Besides providing the Office of Job Corps with information about placed graduates, this data collection will provide similar information about former enrollees 90 days after they separate from Job Corps. This data collection effort also includes re-verification of initial work and school placements of graduates and former enrollees. The effort to re-verify initial work and school placements is consistent with recommendations by the Office of the Inspector General (in *Adopting Best Practices Can Improve Placement Services to Students Terminating From the Job Corps Program* report, 1988) that Job Corps "monitor the services provided by placement contractors to ensure that contract requirements are being met and students are receiving quality placement services."

Thus, the objectives of collecting these data are to:

- Provide yearly information to Congress and the Secretary of Labor about the employment and education outcomes of Job Corps graduates and former enrollees according to the WIA reporting requirements; and

- Assess graduates' and former enrollees' satisfaction with their Job Corps experience in order to identify aspects of the program that were useful to participants, and to identify factors that contributed to decisions to withdraw from the program before graduation.

To fulfill these objectives, ETA/Job Corps has contracted to collect this data using the three primary instruments identified in **Appendix C,** and the two secondary instruments identified in **Appendix D.** Telephone interviews are conducted with graduates and former enrollees or their employers and educational institutions at specified times (see **Appendix A**). The survey contractor obtains identifying information about graduates and former enrollees from the Job Corps Data Center (JCDC), and uses this data to identify the initial work or school placement status of graduates and former enrollees after they leave Job Corps and to find out where they can be contacted.

A2. How, By Whom, and for What Purposes the Information Will Be Used.

Congress and the Secretary of Labor use the data collected with these instruments to assess the effectiveness of the Job Corps program in meeting its objectives under the WIA. The Office of Job Corps incorporates these data into the Outcome Measurement System to evaluate the short-term post-center outcomes of graduates and former enrollees and the long-term post-center outcomes of graduates. The Job Corps program uses the information about student outcomes and the customer feedback about satisfaction with specific services to develop or refine policies in order to improve the delivery of educational and job training services to at-risk youths.

A3. Use of Technology to Reduce Burden

The data collection instruments are programmed into a Computer-Assisted Telephone Interviewing (CATI) system for ongoing survey administration. This automated system performs a range of response checks and complex skip patterns, and it also checks for internal consistency. Additionally, CATI provides automated scheduling, call-back, and online data storage, which make it easier to control the sample, monitor the study, and reduce data entry costs. Automated interviewing reduces burden by speeding up the interviewing process and by reducing the number of interviewer errors that result in callbacks.

A4. Efforts to Identify Duplication

No existing source of data can meet the specific data reporting requirements of the WIA. Although Section 159(e) notes that the Secretary of Labor may collect information on former Job Corps students by using quarterly wage records, such records do not include information about wage rates, hours worked, jobs held in a different state, and jobs that are not covered by unemployment insurance. In addition, unemployment insurance wage records do not provide any information about enrollment in school or training programs, which is a key program outcome. All of the information referred to must be collected to meet the WIA objectives. The instruments presented in this application have been designed to collect this information.

A5. Methods to Minimize Burden on Small Businesses

This data collection effort places minimal burden on small businesses. Businesses are contacted only when former enrollees and graduates who were initially placed in a job cannot be reached to conduct the Former Enrollee Survey (FES) or the ICFE. To provide comprehensive information about placements, employers are contacted to re-verify youths' reported placement status. Job Corps' survey contractor follows a similar practice for individuals who are placed in a school or training program but who cannot be reached to complete the FES or the ICFE. In other words, we contact the educational institutions only to re-verify the initial placement.

Because employers and educational institutions are used only as backup sources for this information and asked only those questions related to re-verification, the burden on small businesses is minimal.

A6. Consequences of Less Frequent Data Collection

Since the information from former enrollees is obtained through a single administration of the instrument, the only issue pertaining to the frequency of data collection concerns the plan for placed graduates. Placed graduates are contacted three times after the initial placement: 90 to 120 days after placement (to complete the ICFE); 6 months after initial placement; and, 12 months after placement. The WIA mandates contacts with placed graduates at 6 and 12 months after their initial placement. Thus, only the ICFE for placed graduates at 90 to 120 days is not mandated by legislation.

The ICFE contact at 90 to 120 days with placed graduates is included in the plan for the following reasons:

• The re-verification questions are included only in the ICFE. Attempting to collect re-verification information as part of the 6-month survey would be more difficult and reduce the reliability of the information.

• The ICFE will collect valuable contact information that will enhance the response rates for the critical surveys to be administered at 6 and 12 months; and

• Having consistent outcome data for placed graduates at 90 to 120 days that can be compared to the outcome data for placed former enrollees at 90 days will be valuable for Job Corps.

A7. Special Circumstances for Data Collection

These data collection efforts do not involve any special circumstances.

A8. Federal Register Notice and Consultation outside the Agency

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to comment on this extension request through a *Federal Register* Notice published September 4, 2015 (Vol. 80, p. 53577). We received one response, from a contractor who is a Job Corps

center operator: Wendy Boyd, Senior Director of Education and Training for the Management and Training Corporation.   The excerpted comments and Job Corps' responses are below:

Comment:	Agency Response:
"We have found that the survey company focuses more on 13-week graduate and former enrollee surveys, over 12-week surveys, instead of surveying the two pools equally. Example, in October 2015, there were 44 Utah/Montana (UTMT) students in the 13-week survey window and 40 of these students surveyed, for an **87%** contact rate. However, there were 77 students in the 12-month survey window and only 25 were surveyed, for a **32%** contact rate. As 13-week surveys hold no weight on a CTS report and 12 months surveys hold a 20% weight, the issue over the survey company not uniformly contacting students in the pools negatively impacts CTS contractors as well as does not accurately report graduate outcomes."	Job Corps appreciates this comment. Some confusion may exist in how the Job Corps placement surveys work. Job Corps uses call scheduler software to ensure that all 3 types of surveys (13-week, 6-month, and 12-month) are attempted with the same frequency and schedule throughout the 8-week survey window. While the efforts expended across the various survey types are comparable, the resulting response rates are different because of the elapsed time after the student has left Job Corps. The survey population (former Job Corps participants) are highly mobile and often hard-to reach. Contact information deteriorates over time (people move, phone numbers change). To reach students, Job Corps has dedicated staff that look for alternate contact information and search for updated contact information. Some of the tools used to track respondents include: Accurint, Lexis Nexis, reverse lookups, and white pages.
"The survey companies changing the policy to not students to call into the survey lines is a practice that does not support the accuracy and validity of placement data. This change has lowered their customer service and caseloads. For example, at one of our CTS contracts (Utah/Montana) in July 2015 there were **122** students in the 12-month survey window yet only **13** students were	Job Corps appreciates this comment. Job Corps continues to accept incoming calls from students that are in the survey window. The program does, however, discourage wholesale call-in by students for two strong reasons. First, the entire survey system is predicated on an out-bound calling methodology, with the overwhelming bulk of resources dedicated to calling the thousands

surveyed. This was only a **11% of the students in the survey range**."	of students electronically presented to call-center staff. Far fewer resources are dedicated to receiving large volumes of in-bound calls, and negatively affect productivity when this occurs. The second reason is the need to enhance and protect data integrity. When a student is contacted at the home numbers listed on the student's record, the program has much higher confidence that surveyors are speaking with the actual student they are trying to contact. This method provides the program greater confidence in the integrity of its data, and is superior to receiving large numbers of in-bound calls from unidentified persons who merely assert that they are the student.
"The current survey process/companies do not allow students who they do not contact to prove their employment. When students are not able to take the survey, an appeal cannot be filed since there is no negative credit. Consequently, the survey results are skewed."	
"In addition, the PRH placement goals have increased for centers and CTS contracts in PY2015, from 75% to 80%; wage goals have also increased. Overall, the survey goals constitute 40% of the CTS report card, 22.5% of the center report card, and 30% of the CTT Report card. If the survey companies are not contacting a larger number of eligible graduates, this negatively impacts the accuracy of outcomes."	Job Corps appreciates this concern and will address it while developing the WIOA reporting system.
"The survey companies no longer survey our most successful students; those in the military. Students who enter the military and are deployed cannot take the survey. These students used to be given credit through MilPal (MOU with the DOD), however the MOU has expired. This is another example of survey companies not accurately reporting outcomes."	Job Corps appreciates this concern. The survey questionnaire was designed to capture employment in a variety of situations, including the military. All placed graduates and former enrollees, including those who are in the military, are eligible for the follow up survey. For students serving in the military and hard to reach, Job Corps allows family members to confirm military employment. However, family members are not allowed to

	complete the survey. The implicit military wage level is defined by the Office of Job Corps.
"The survey companies are not using student cell phone numbers for contact. The report they utilize only has home numbers. The CTS contractors must email the survey companies student contact numbers. This is an undue burden on the CTS contractors yet has to be done in attempt to ensure accurate outcomes are reported."	Job Corps attempts to reach former students at any and all of the numbers provided on the student's Job Corps records. Those records include capture-points for home numbers, work numbers and cell phone numbers. While developing the new WIOA reports, Job Corps will try to develop ways to better capture and use students' cell phone numbers.
"The survey questions asked to determine student identity need to be revised. Rather than asking students for their Job Corps ID, they could they ask for date of birth, center attended, or trade completed. Many students' performance is not collected because students to not remember their student ID, social security number, or the exact date they arrived or graduated the program. In addition, requesting social security information over the phone is one area we teach students not to give during enrollment as it is an issue for identity theft."	Job Corps appreciates this concern. Some confusion may exist in how the survey system works. A critical component of the survey process is confirmation that Job Corps surveyors are speaking to the correct person. Surveyors are trained to ask a series of questions designed to establish and confirm the identity of the person they are interviewing. If any of the information provided does not match our records, before proceeding, the interviewer will ask more difficult questions to verify the identity of the caller. This is an important and necessary step in protecting data integrity and ensuring the correct person is being surveyed.
"Alaina Barreras/6 month survey: The pending survey report showed her window open as of 6/15. She called on 6/25 and was told that she couldn't take the survey because her window was closed. The report also listed her to contact Battelle when it should have been Impaq. (Impaq does 6 month and Battelle does 12 month)."	Job Corps appreciates this concern. Some confusion may exist in how the survey population is scheduled for interviewed. Whenever a participant enters the follow-up survey window and is queued for a follow-up survey, the Job Corps Data Center's (JCDC) issues a Pending Post Placement Report that shows the open and close dates of the 8-week survey window. The Pending Post Placement Report also identifies the appropriate survey

	organization and corresponding toll-free number for the survey line. Please refer to the Pending Post Placement report to determine which survey organization has the survey record.
"We have had many students complain that they could not understand the surveyor when they were called. This issue also has a negative impact on the accuracy of the survey data."	Job Corps appreciates this concern, and will address it with the support contractor.

A9. Payment or Gifts to Respondents

To meet the requirements of the WIA, Job Corps developed the CDSS to provide ongoing services to program graduates for up to one year after their initial placement. A key element of this system involves regular contacts between the student and his or her career transition specialist. To encourage students to maintain contact with Job Corps, the Career Information System (CIS) provides graduates with a transitional allowance and post-separation incentives: payments paid upon completion of the ICFE ($10); the 6-month follow-up survey ($15); and, the 12-month follow-up survey ($20). Because the system for former enrollees limits placement services to 90 days, no additional incentives are offered for former enrollees to remain in contact with Job Corps.

A10. Confidentiality Assurances

This survey is conducted in accordance with all relevant regulations and requirements, including the Privacy Act of 1974 (5 USC 552a), the Privacy Act Regulations (34 CFR Part 5b), the Freedom of Information Act (5 CFR 552) and its related regulations (41 CFR Part 1-1, 45 CFR Part 5b, and 40 CFR 44502). To support Job Corps' commitment to securing Personal Identifiable Information (PII), in May 2007 all aspects of the data collection process were consolidated under the secure network environment provided and maintained by the JCDC. Job Corps' survey contractor worked closely with the JCDC to secure the servers that housed respondent survey data and contact information by moving the servers to JCDC's Texas location. The application is accessible via Citrix, JCDC's preferred secure method.

The JCDC takes several steps to insure the safety and integrity of the student data housed at its facilities in Austin, Texas and Limestone, Maine. All student data is securely housed on a central server, protected by several layers of security. First, the server network is a private network. The network is protected from the Internet by a series of layered firewalls, access control lists, and intrusion detection systems.

All Job Corps employees enter data into the system through the private network. All users must have a valid user ID and password (which is changed every 90 days) to enter the system. Additional security is obtained through the use of application-level user IDs and passwords, and specific permission applied at the database level. The integrity of the data is insured by running daily validation programs that submit the data to a set of pre-approved business rules established by the Office of Job Corps. To secure the integrity of the data during transmission to the data collection contractors, JCDC has established 128-bit encrypted Citrix sessions from the data collection center operators to the JCDC. All of Job Corps survey contractor staff have completed security awareness training, and have access to Citrix environment and the CDSS suite of applications.

Additionally, the contractor and subcontractor survey sites are maintained in accordance with the Guide for Developing Security Plans for Information Technology Systems (NIST Special Pub 800-18) posted by the National Institute of Standards and Technology's Computer Security Resource Center. Internal access to individual records within the database and the ability to access data transmissions between the JCDC and the data collection contractor are controlled by all appropriate security measures, including controlled user names, passwords, profile name, host name, firewall security IDs, and crypto cards. Transfer of data occurs only via Citrix, ensuring a secure means of communication for the data collection contractors and JCDC.

Additionally, the Personal Computers (PC) in staff offices that are wired to the network are located within the same building as the network drive. The PCs are accessible only after providing individual user passwords that must be changed on a regular basis. Screensavers are installed on all PCs, set to activate after 10 minutes, and can only be released through the individual user's password. PC passwords are not physically documented; therefore, loss of access may be recouped only by the reassignment of a password by the information systems staff.

All respondents are told that completing the interview is voluntary and that the information they provide will not be shared with anyone outside of the Job Corps community. Answers to some questions in the instrument will be provided to appropriate agency staff (for example, information that results in questioning the validity of the initial placement will be reported to Job Corps Regional Office staff for follow-up), and answers to other questions will be reported at the individual level in the Job Corps Outcome Measurement System (for example, placement and wage status at 6 and 12 months). Therefore, it is not possible to guarantee to respondents that their answers will not be released to anyone. However, respondents will be assured that Job Corps will use the collected data only for program evaluation purposes, and that their individual answers will not be shared with anyone outside of Job Corps.

The policies and procedures maintained by the survey contractor are designed to protect the respondents' privacy, requiring all CATI center staff to sign pledges to protect respondents' privacy. Additionally, privacy issues are addressed in training sessions for all staff involved with the administration of the data collection instruments. Access to sample selection data is limited to those who have direct responsibility for sample selection. Individual identifying information is maintained separately from hardcopy collection forms and from computerized

data files prepared for conducting the analysis.

To keep the data private, it is important not to release data into public use files or to present results in reports so that individuals can be identified. Data collected through the instruments presented here will not be made publicly available. Job Corps staff or contractors analyze data for purposes of program management and quality improvement. Nonetheless, reports that use these data are handled in a manner that eliminates the possibility of compromising privacy. Job Corps staff and contractors follow commonly accepted guidelines (what the Federal Committee on Statistical Methodology calls the Threshold Rule) and display only aggregated data when there are more than three cases in a cell table. When there are three or fewer cases in a cell table, tabular data will be presented by combining categories or suppressing cells to ensure the elimination of possible individual identities. Given the size of Job Corps centers and the monthly year-to-date aggregation of data, the data presented in any cell table will most likely represent information from at least four observations.

A11. Additional Justification for Sensitive Questions

For the most part, these data collection instruments do not include questions of a sensitive or personal nature. In any case, all respondents are assured that their responses are kept private at the outset of the interview and are informed that they need not answer questions with which they are uncomfortable. The only questions that may be of a sensitive nature for some respondents pertain to wages and income from employment. Income from employment is an important indicator of economic self-sufficiency, and wage and earnings measures are specifically required by the WIA legislation. The Office of Job Corps (OJC) has found that wage and income questions, when asked in a matter-of-fact manner, are not refused significantly more than other items.

Moreover, all of the questions concerning wages and income have been successfully pretested, and similar questions have been used extensively in previous instruments with no evidence of adverse consequences. Additionally, the survey instrument is equipped to accommodate respondents who are uncomfortable providing a specific wage by allowing their answers to be coded in ranges.

A12. Estimates of the Burden of Data Collection

This data collection is an annual process that supports the administration of approximately 48,300 Job Corps telephone interviews. The interviews require an average of 10 to 15 minutes. These administration times are based on past experience in using these instruments.

The combined reporting burden for respondents associated with this data collection effort is approximately 10,240 hours, as shown in Table 1.

Table 1. Estimates of Respondent Burden

Average Time

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Respondent Category	Number of Respondents	(Hours) per Respondent	Estimated Hours
Placed Former Enrollees at 90 days	800	0.25	200
Placed Graduates at 90-120 days	13,800	0.25	3,450
Placed Graduates at 6 Months	15,500	0.20	3,100
Placed Graduates at 12 Months	13,200	0.20	2,640
Employer/Institution Re-Verification	5,000	0.17	850
Unduplicated Total	**48,300**		**10,240**

Costs to respondents are limited to the time they spend being interviewed by telephone. For employer/institution verifications, this also includes time spent faxing responses or completing verifications over the telephone.

> Table 2 shows the estimated costs to former enrollees and to placed respondents, based on the Job Corps national average wage of placed graduates and former enrollees for Program Year 2014.
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> These hourly rates are the mean wages reported by survey respondents in each category. A mean average hourly rate of $39.88 was used for estimating the costs of responses for employer/educational institution respondents. This is the mean average hourly earnings in the U.S. Department of Labor Bureau of Labor Statistics for the latest available calculations at the time of submission. See the mean hourly rate for category 11-9039, Educational Administrators, All Other, at http://www.bls.gov/oes/current/oes_nat.htm#25-0000.

The total estimated cost of the burden for respondents is approximately $115,596 per year. This burden is offset by the incentive payments totaling approximately $634,500 (See section A14 for calculation) that will be provided to many of the respondents for remaining in contact with the follow-up system for services and tracking.

Table 2. Estimated Cost to Respondents

Respondent Category	Number of Respondents	Total Number of Hours	Hourly Rate	Estimated Data Collection Cost to Respondents	Estimated Data Collection Cost per Respondent
Placed former enrollees at 90 days	**800**	**200**	**$9.93**	**$1,986**	**$2.48**
Placed graduates at 90 to 120 days	**13,800**	**3,450**	**$10.05**	**$34,673**	**$2.51**
Placed graduates at 6 months	**1 5,500**	**3,100**	**$10.05**	**$31,155**	**$2.01**
Placed graduates at	**13, 200**	**2,640**	**$10.05**	**$26,532**	**$2.01**

12 months Employer/ Institution Reverification	**5,000**	**850**	**$39.88**	**$33,898**	**$6.78**
Totals	**48,300**	**10,240**		**$128,244**	

Total Respondent Burden Cost: $115,596

Total Burden Hours: 10,240

A13. Estimated Cost of the Survey

There are no costs to the respondents for participating in this survey. All telephone or postage costs for contacting the respondents are borne by the Federal government through the data collection contractors.

A14. Estimates of Annual Costs to the Federal Government

The estimated cost of funding this data collection effort in 2014 was $3,580,000 dollars. This estimate includes the ongoing maintenance of the infrastructure needed to administer the CATI system, ongoing data communication to and from JCDC, data collection using telephone interviews from trained staff who are not Job Corps employees, data processing including coding of occupational and industry information, and preparation of summary data tabulations. Supervision of this total system is also included here. This cost does not include one-time expenditures.

Approximately 95 percent of the data collection cost is spent on labor.
Approximately 5 percent of the cost is budgeted for long distance phone service,
postage, training materials, and equipment necessary to maintain CATI operations.

Additionally, the incentive system used to encourage graduates to remain in touch with the Job Corps system and participate in the survey is budgeted to cost $634,500 annually. The incentive system provides $10, $15, and $20 payments to graduates for participating in the 90 to 120 day survey, the 6 month survey, and the 12 month survey, respectively (see Table 3).

Table 3. Incentive Payments

Graduate Surveys	Respondents	Incentive	Amount
Placed graduates at 90 to 120 days	13,800	$10	$138,000
Placed graduates at 6 months	15,500	$15	$232,500
Placed graduates at 12 months	13,200	$20	$264,000

Totals	42,500	$634,500

The total cost per completed student interview for this data collection is estimated at approximately $99.51.

A15. Changes in Burden

Job Corps centers' enrollment has been reduced from approximately 44,000 in PY-12 to 38,000 now. Therefore the corresponding number of respondents has been reduced, with the number of completed interviews declining from the previous OMB submission - from 53,323 total respondents to 48,300 total respondents. Consequently the burden on respondents has correspondingly declined from 11,440 hours to 10,240.

A16. Tabulation and Publication Plans and Time Schedules for the Project

The data collected serves three primary purposes. First, the data is used to fulfill part of the performance measurement and reporting requirements for the Job Corps program specified in WIA. Second, data is used for independent verification of contractor reported outcomes regarding initial and longer-term placement and wages. Such information is used in determining incentive and award fees as part of the performance-based service contracts through which Job Corps operates centers and post-center services. Finally, the information supports the continuous program improvement activities regularly conducted by the Office of Job Corps and program operators. Although the same data collection instruments support all the purposes, the analysis plan, reporting plan, and time schedule for each differ.

Performance measurement results are calculated and published on a monthly basis at the center, regional, and national levels. These reports include the following measures:

- the proportion of initially placed graduates who are still placed in a job or schooling program at 6 months;

- the average weekly earnings of placed graduates at 6 months;

- the proportion of initially placed graduates who are still placed in a job or schooling program at 12 months; and

- the average weekly earnings of placed graduates at 12 months.

Data from the 90-day surveys of former enrollees and graduates, identified as placed in a job or school program, are used by the Office of Job Corps to re-verify the reports provided by those contractors. Reports of Questionable Placements (QP), (those who fail to meet Job Corps' criteria for proper job placement or school enrollment) are provided to the Job Corps Regional Offices for follow up with the reporting contractor to determine whether the reported placement will be disallowed for the performance report for that contractor. These QP reports are for

internal contractor monitoring and management purposes only, and are not published or made public.

A17. Approval Not to Display OMB Expiration Date

Approval is not requested.

A18. Exceptions

No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."