

**Supporting Statement  
Placement Verification and Follow-up of Job Corps Participants  
OMB Control No. 1205-0426**

This ICR is being submitted in association with the Workforce Innovation and Opportunity Act. This package is unchanged from the approved ICR except to add the regulatory citations, which are 20 CFR §686.945, § 686.955, § 686.1000, § 686.1010, § 686.1020, § 686.1030, § 686.1040.

**A. JUSTIFICATION**

Since 1998, the Workforce Investment Act (WIA) has required the Office of Job Corps to collect and report the employment outcomes of Job Corps Graduates and Former Enrollees under the approval of the Paperwork Reduction Act (PRA). The OMB approval under PRA for this collection was most recently renewed in March 2016.

To implement the performance requirements of the 2014 Workforce Innovation and Opportunity Act (WIOA), the Office of Job Corps is designing a new WIOA reporting system which is to become effective on July 1, 2016{Sec. 506(b)(1) of WIOA}. The new WIOA reporting system includes revisions to the Post Enrollment Data Collection (PEDC) system to collect data and information about post-enrollment placements to align with specific WIOA reporting requirements. This 30-day FRN submission requests OMB approval for the data collection instruments of the revised PEDC system to collect the required follow-up data from Job Corps program participants during the second and fourth quarters after program exit.

The rationale for conducting the PEDC is explained in further detail in Section A1 of this Supporting Statement (Consequences of Less Frequent Data Collection). This collection is necessary in order to obtain the data required under Sections 159(c) and (d) of WIOA. Section 159(c) requires the Secretary of Labor to collect information on performance of Job Corps participants, centers, recruiters, and career transition service providers. It requires the information to be consistent with the WIOA performance indicators as amended by Section 116(b) (2) (A) (ii) of WIOA. It also includes additional metrics that Job Corps is required to track. In addition, Section 159(c)(1) of WIOA amends the WIA required performance indicators for Job Corps centers and programs by replacing some of the indicators with primary indicators of performance that are applicable to the youth formula programs, which are found at Section 116(b)(2)(A)(ii).

The regulatory citations are detailed below:

**686.945** Provides the procedures for the management of Job Corps student records. These can be found in the Department of Labor's Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student records management of student records. The Secretary issues guidelines for a system for maintaining records for each student during enrollment and for disposition of such records after separation.

**686.955** Establishes procedures to ensure the timely and complete reporting of necessary financial and program information to maintain accountability. Center operators and operational support service providers are responsible for the accuracy and integrity of all reports and data they provide.

**686.1000** Describes how the performance of the Job Corps program as a whole, and the performance of individual centers, outreach and admissions providers, and career transition service providers, is assessed in accordance with the regulations in this part and procedures and standards issued by the Secretary, through a national performance management system, including the Outcome Measurement System (OMS).

**686.1010** Describes the primary indicators of performance for Job Corps centers and the Job Corps program as outlined in this submission.

**686.1020** Describes the indicators of performance for Job Corps outreach and admissions providers.

**686.1030** Describes the indicators of performance for Job Corps career transition service providers.

**686.1040** Details the information that will be collected for use in the Annual Report.

Ultimately, Job Corps intends to incorporate the use of administrative data (state wage records) to track student outcomes when it meets Job Corps' reporting requirements under WIOA. Adding administrative data to its current methods will allow Job Corps to correlate information in a more efficient, accurate, and repeatable manner. When Job Corps' current data collection methods are augmented by administrative data, it will allow the program to begin tracking outcomes for all participants including those who may not be reached under the current data collection methods. This enhanced data collection and reporting process will be highly useful for program operators and program leadership in understanding the outcomes of all youth who interact with the Job Corps program.

The questions in this collection are designed to obtain information needed to report on five of the six WIOA required primary performance measures. These measures are:

- the percentage of program participants who are in education or training activities, or in unsubsidized employment during the second quarter after exit from the program;
- the percentage of program participants who are in education or training activities, or in unsubsidized employment during the fourth quarter after exit from the program;
- the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- the percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (and, for those who obtain a secondary school diploma or its recognized equivalent, have also obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential), during participation in or within one year after exit from the program;
- the indicator(s) of effectiveness in serving employers.

An overview of the modules included in the data collection instruments is provided in Appendix A. Additionally, scripts used in the administration of the two primary collection instruments are provided in Appendix B and the script used in the Employer/Institution instrument is provided in Appendix D.

*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.*

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 was originally established by the Economic Opportunity Act of 1964. The program was transferred from the Office of Economic Opportunity to the Department of Labor in 1969. Job Corps was later authorized as part of the Comprehensive Employment and Training Act (1978) under Title IV-B, and this authorization continued as part of the Job Training Partnership Act (JTPA) of 1982 and the Workforce Investment Act (WIA) of 1998. Now authorized by the Workforce Innovation and Opportunity Act (WIOA), Job Corps is administered federally through the Department of Labor, Employment and Training Administration, Office of Job Corps. The Job Corps program comprises 6 regional offices and 126 Job Corps centers nationwide.

Job Corps participants are typically high school dropouts in need of further education and technical training. Most Job Corps participants live on campus, but in some centers, youth 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 come from 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 a secondary school credential, learn a business or trade through the career technical training program, earn an industry recognized credential 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 diploma (or its equivalent) or complete their career technical training are considered to be program graduates. Students who remain in Job Corps for at least 60 days but leave the program before obtaining a high school diploma (or its equivalent) or completing their career technical training are considered former enrollees.

Upon graduation from Job Corps, youth are prepared to pursue employment opportunities, additional educational and training experiences, or enter the Armed Forces. Job Corps career development specialists are responsible for assisting graduates and former enrollees with finding a job or enrolling in a school or training program. Career development specialists also help students create resumes and prepare for interviews. WIOA authorizes Job Corps to provide placement services to graduates for up to 12 months after they exit the program and to former enrollees for 3 months after exit.

The revised PEDC will collect information to report on five of the six WIOA required primary performance measures. These are:

- the percentage of program participants who are in education or training activities, or in

- unsubsidized employment during the second quarter after exit from the program;
- the percentage of program participants who are in education or training activities, or in unsubsidized employment during the fourth quarter after exit from the program;
- the median earnings of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- the percentage of program participants who obtain a recognized postsecondary credential, or a secondary school diploma or its recognized equivalent (and, for those who obtain a secondary school diploma or its recognized equivalent, have also obtained or retained employment or are in an education or training program leading to a recognized postsecondary credential), during participation in or within one year after exit from the program; and
- the indicator(s) of effectiveness in serving employers.

Information relevant to the sixth WIOA primary indicator, measurable skill gains {sec. 116(b)(2)(A)(i)(V)}, is not obtained through this information collection. It will be collected using an existing data collection system that does not require change and is conducted before a participant exits the program.

Job Corps will also use the information collected from the proposed PEDC to measure and report participant performance under the following metrics mandated by Section 159(d) of WIOA:

- the number of graduates who entered the Armed Forces;
- the number of graduates who entered apprenticeship programs;
- the number of graduates who received a regular secondary school diploma;
- the number of graduates who received a State recognized equivalent of a secondary school diploma;
- the number of graduates who entered unsubsidized employment related to the career and technical education and training received through the Job Corps program;
- the number of graduates who entered unsubsidized employment not related to the education and training received;
- the percentage and number of graduates who enter postsecondary education;
- the average wage of graduates who enter unsubsidized employment—
  - 1) on the first day of such employment; and
  - 2) on the day 6 months after such first day

This data collection effort also provides for verification of work and school placements for all placed graduates and former enrollees. In addition it provides for selected verification for employers and educational institutions and information responsive to the WIOA measure on the effectiveness of serving employers.

The effort to verify work and school placements and obtain information on program effectiveness is consistent with recommendations by the Office of the Inspector General in their 1988 report 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."

In addition to compliance with the WIOA reporting requirement of effectiveness in serving

employers, customer satisfaction data is important and useful to effect program improvement. Results can be compared with internal outcome measurement programs to ensure they agree with actual customer sentiment. Customer feedback can help identify areas for improvement and lead to new initiatives. Data suggests that outbound phone interviews are easier to complete and provide the strongest response rates.

To fulfill these information collection objectives, Job Corps will use the two primary instruments identified in **Appendix C** and the secondary instruments identified in **Appendix D** to collect data. The Job Corps Data Center (JCDC) will provide information about graduates and former enrollees for all surveys. The information will include contact information in addition to the work or school placement status of graduates and former enrollees after exiting 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.*

Congress and the Secretary of Labor will use the data collected with these instruments to assess the effectiveness of the Job Corps program in meeting its objectives under WIOA. The data collected will be used to fulfill the reporting requirements under Section 116(b)(2)(A)(i) and Section 159(c)(4) of WIOA. The Office of Job Corps will also incorporate these data into the Outcome Measurement System to evaluate the post-center outcomes of graduates and former enrollees. Job Corps will use the information about student outcomes and customer feedback about satisfaction with specific services to develop or refine policies to improve the delivery of educational and job training services to at-risk youth.

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

The data collection instruments will be programmed into a computer generated online system for ongoing survey administration augmented by a Computer-Assisted Telephone Interviewing (CATI) system. 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, callback, and on-line data storage, which make it easier to control the sample, monitor the study, and reduce data entry costs. Automated online interviewing reduces the burden by speeding up the collection and analysis of the results and reduces the number of interviews under CATI.

*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.*

No other existing source of data can meet the specific data reporting requirements of WIOA. Although Section 116 (i) (2) of WIOA notes that the Secretary of Labor may collect information on former Job Corps students by using quarterly wage records, such records, in ~~its~~ their current form, do not include information sufficient to support reporting at this time on all the different indicators required. For example, the data available from records collected by Unemployment Insurance (UI) do not include individual information about wage rates, hours worked, or earnings at the individual student level. In addition, UI wage records do not provide any information about enrollment in school or training programs or attainment of secondary or post-secondary credentials, which are key program outcomes, and needed for accurately calculating several of the six primary WIOA measures. Finally, UI wage record information available to Job Corps through national data bases such as the Common Reporting Information System (CRIS) on employer identification number are not consistently available across states, which would lead Job Corps to underreport on the proposed effectiveness in serving employers measure. All of the information referred to in this collection is required to fully measure individual participant performance under the WIOA performance measures, as required by Section 159 of WIOA. The instruments presented in this application have been designed to collect this information.

*5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

This data collection will place minimal burden on small businesses. Businesses and educational institutions will be contacted through a short phone interview and/or by an online method. The brief employment/educational institution verification and satisfaction survey instruments for employers and educational institutions are included in **Appendix D**.

*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.*

Since the information from former enrollees and graduates must be obtained according to the requirements of WIOA, less frequent data collection will not allow the Office of Job Corps to track participant performance under the performance measures specified by WIOA. WIOA mandates contacts with participants to collect information about outcomes in the second and fourth quarters after exit from the program.

The PEDC contact with graduates and former enrollees during the two periods will collect additional information as required under the law.

*7. Explain any special circumstances that would cause an information collection to be conducted in a manner:*

These data collection efforts do not involve any special circumstances.

*8. If applicable, provide a copy and identify the date 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.*

Concurrent with submission of this ICR submission on April 16, 2015, ETA issued a Notice of Proposed Rulemaking (80 FR 20689) that provided a 60-day period for the public to comment on the change to the collection of information. The Department received no public comments. In accordance with the Paperwork Reduction Act (PRA), the public was given a sixty day opportunity to review and comment on this submission through the publication of a notice in the *Federal Register* on March 1, 2016 (81 FR 10664).

The Department received two comments in response to the notice. Both comments concerned the use of administrative data, such as unemployment insurance (UI) wage data, and surveys to collect performance information under the Workforce Innovation and Opportunity Act (WIOA). Commenters stated that, as WIOA requires wage records be used as a primary source of information for performance reporting, the proposal to continue relying on surveys through the Post Enrollment Data Collection System (PEDCS) is unnecessary and inefficient. The commenters recommended that the Department utilize UI wage data through the Wage Record Interchange System, and consider the use of state longitudinal data systems to augment credential attainment. One commenter, however, clearly pointed out the various limitations of the currently available administrative data.

The Department notes that, currently, no source of administrative data exist that can meet the specific data reporting requirements of WIOA. Such records, in their current form, do not include information sufficient to support reporting at this time on all the different indicators required. For example, the data available from records collected by Unemployment Insurance (UI) do not include individual information about wage rates, hours worked, or earnings at the individual student level. In addition, UI wage records do not provide any information about enrollment in school or training programs or attainment of secondary or post-secondary credentials, which are key program outcomes, and needed for accurately calculating several of the six primary WIOA measures. Finally, UI wage record information available to Job Corps through national data bases such as the Common Reporting Information System (CRIS) on employer identification number are not consistently available across states, which would lead Job Corps to underreport on the proposed effectiveness in serving employers measure.

Job Corps has revised the PEDCS to collect data and information about post-enrollment placements to align with specific WIOA reporting requirements. The revised PEDC will collect information to report on five of the six WIOA required primary performance measures,

Ultimately, Job Corps intends to incorporate the use of administrative data (state wage records) to track student outcomes under WIOA. Adding administrative data to its current methods will allow Job Corps to correlate information in a more efficient, accurate, and repeatable manner. Enhanced data collection and reporting process will be highly useful for program operators and program leadership in understanding the outcomes of all youth who interact with the Job Corps program.

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

Consistent with WIOA, the Job Corps program provides ongoing services to graduates for one year and former enrollees for 90 days after exit. 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 program provides graduates with a transitional allowance and graduates and former enrollees with post-separation incentives for taking the PEDC surveys: \$10 after completion of the 2<sup>nd</sup> quarter survey and \$20 after completing the 4<sup>th</sup> quarter survey.

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

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). In addition, the procedures for the management of Job Corps student records can be found in the Department of Labor's Privacy Act System of Records Notice (SORN) DOL/GOVT-2 (Job Corps Student Records) 67 FR 16815. The Secretary issues guidelines for a system for maintaining records for each student during enrollment and for disposition of such records after separation.

In May 2007, in an effort to proactively support Job Corps' commitment to securing Personal Identifiable Information (PII), all aspects of the data collection process were consolidated under the secure network environment provided and maintained by the JCDC. The application is accessible via Citrix, JCDC's preferred secure method.

JCDC takes several steps to insure the safety and integrity of the student data housed at its facilities in Austin, Texas. All student data is housed on a central server, in a secured computer room in a locked building on the fenced and guarded facility. There are several layers of system security. The server network is a private network. The network is also protected from the Internet by a series of layered firewalls, access control lists, and intrusion detection systems.

All Job Corps employees and contractors 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 two-factor authentication, 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. In order to secure the integrity of the data during transmission to the data collection contractors, JCDC has established 256 bit encrypted Citrix sessions from the data collection center operators to the JCDC. All of the survey contractor's staff have completed security awareness training and have access to the Citrix environment and the CDSS suite of applications.

Additionally, the contractor survey sites are maintained in accordance with the Guide for Security and Privacy Controls for Federal Information Systems and Organizations (SP 800-53 Revision 4), at the moderate level, posted by The National Institute of Standards and Technology's Computer Security Resource Center. Internal access to individual records within the database at the Job Corps Data Center follow the principles of least privilege required and are controlled by all appropriate security measures, including controlled user names, passwords, profile name, host name, firewall security IDs, and crypto cards. Input of data occurs only via a secure Citrix tunnel maintained by JCDC, ensuring a secure means of communication for the data collection contractors and hosting facility.

Additionally, the personal computers (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 ten 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 Job Corps survey 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 survey 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). Answers to other questions will be reported at the individual level in the Job Corps Outcome Measurement System (for example, placement and wage status during the second and fourth quarters after exit). 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 answers will not be shared with anyone outside of Job Corps without their written approval.

The policies and procedures maintained at any facility operated by service providers under contract are designed to protect the privacy of data. All contract personnel are required to sign pledges to protect respondents' privacy. Respondent name and contact information is stored in a computer database that is separate from the database that stores the survey responses.

Additionally, the issues of privacy will be addressed in training sessions for all staff involved with the administration of the data collection instruments. Individual identifying information will be 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 survey instruments will not be made publicly available. Job Corps staff or contractors will analyze data

for purposes of program management and quality improvement. Nonetheless, reports that use these data will be handled in a manner that eliminates the possibility of compromising privacy. Job Corps staff and contractors will 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.

*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.*

These data collection instruments being submitted for approval do not include questions of a sensitive or personal nature. All respondents are assured that their responses will be kept private at the outset of the survey or phone interview unless they wish to specifically authorize its release in writing. In addition, they will be informed that they do not have to answer questions with which they are uncomfortable.

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. Specifically, similar questions about wages and income from employment were used in the "Evaluation of the Impact of the Job Corps Program on Participants' Post-Program Labor Market and Related Behavior" study (CMB 1205-0351, expiration date 10/96).

*12. Provide estimates of the hour burden of the collection of information.*

This data collection is an annual process that supports the administration of approximately 93,400 Job Corps online surveys and telephone interviews. The surveys are estimated to require an average of 12 minutes to complete and the telephone interviews 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 estimated at approximately 21,700 hours, as shown in Table 1.

**Table1: Estimates of Respondent Burden Average Time**

<b>Respondent Category</b>	<b>Total Responses</b>	<b>Hours per Respondent</b>	<b>Estimated Hours</b>
Online survey of graduates and former enrollees during the second and fourth quarter after exit	28,000	0.20	5,600
Telephone interview of graduates and former enrollees during the second and fourth quarter after exit	60,400	0.25	15,100
Employer/Institution Verification/Satisfaction Survey	<u>5,000</u>	<u>0.20</u>	<u>1,000</u>
<b>Total</b>	<b>93,400</b>		<b>21,700</b>

Costs to respondents are limited to the time they will spend answering the online survey and being interviewed by telephone.

Table 2 shows the estimated costs to respondents, based on the Job Corps national average wage of placed graduates and former enrollees for Program Year 2014. A standard hourly rate of \$25.00 per hour is used for estimating the costs of responses for employers and educational institutions.

The total estimated cost of the burden for respondents is approximately \$232,267 per year. This burden is offset by the incentive payments totaling approximately \$1,326,000 (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**

**Estimated Data Total Estimated Data Collection**

Placement Verification and Follow-up of Job Corps Participants

OMB Control No. 1205-0426

July 2016

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Online survey of Former Enrollees during the second and fourth quarter after exit	3,000	2	6,000	0.2	1,200	\$9.93	\$1.99
Online survey of Graduates during the second and fourth quarter after exit	11,000	2	22,000	0.2	4,400	\$10.05	\$2.01
Telephone interview of Former Enrollees during the second and fourth quarter after exit.	10,400	2	20,800	0.25	5,200	\$9.93	\$2.48
Telephone interview of Graduates during the second and fourth quarter after exit.	19,800	2	39,600	0.25	9,900	\$10.05	\$2.51
Employer/Institution Verification/Satisfaction Survey	5,000	1	5,000	0.2	1,000	\$25.00	\$5.00
<b>Unduplicated Totals</b>	<b>49,200</b>		<b>93,400</b>		<b>21,700</b>		

\* Hourly wage rates for Graduates and Former Enrollees based on PY-14 MPO-35 Report dated 9/2/15.

\* Employer/Institution wage rates based on BLS data (pay and benefits).

13. Provide an estimate for 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 already reflected on the burden worksheet).

There are no additional 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.

14. Provide estimates of annualized costs 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.

The estimated cost of funding this data collection effort in 2015 was \$3,700,000 dollars. This estimate includes the ongoing maintenance of the infrastructure needed to administer the CATI system, ongoing data communication to and from the Job Corps Data Center, and 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 that will not recur in the future.

Approximately 40% of the cost is budgeted for labor. Approximately 5% of the cost is budgeted for long distance phone service, and approximately 55% of the cost is budgeted for software and equipment including the CATI facilities.

Additionally, the incentive system used to help ensure that graduates and former enrollees remain in contact with the Job Corps system will cost approximately \$1,326,000 annually (Table 3). The incentive system allots \$10 payments to graduates and former enrollees completing the second quarter survey and \$20 payments for those completing the fourth quarter survey after exit.

**Table 3: Incentive Payments**

<b>Surveys</b>	<b>Respondents</b>	<b>Incentive</b>	<b>Amount</b>
Graduates and former enrollees at second quarter after exit	44,200	\$10	\$442,000
Graduates and former enrollees at fourth quarter after exit	44,200	\$20	\$884,000
<b>Total</b>	<b>88,400</b>		<b>\$1,326,000</b>

The total cost per completed survey for this data collection is estimated at approximately \$55.00 for the Job Corps Post Enrollment Data Collection System.

The total annual cost to the Federal Government is \$5,026,000.

*15. Explain the reasons for any program changes or adjustments reported on the burden worksheet.*

The most recent ICR, submitted in December 2015, estimated 48,300 total respondents to the survey, with a corresponding burden of 10,240 hours. For this ICR, Job Corps estimates it will have 49,200 former enrollee and graduate respondents in the second and fourth quarter surveys plus 5,000 employer/institution respondents, yielding a total of 93,400 total responses. This results in a burden of 21,700 hours, an increase of 11,460 hours. This increase in burden under WIOA is attributable to the requirement to survey all program participants, which produces a much larger pool than was produced under the WIA requirement to survey only placed graduates and former enrollees.

*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.*

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 WIOA. Secondly, the data is used for independent verification of contractor reported outcomes regarding initial 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 these purposes, the analysis plan,

reporting plan and time schedule for each does differ.

Performance measurement results are calculated and published on a monthly basis at the center, regional, and national levels.

As part of each contractor's performance measurement, data from the surveys of former enrollees and graduates who were identified as placed in a job or school program are used by Job Corps to verify the reports provided by those contractors. Reports of questionable placements (QPs), i.e., those that fail to meet Job Corps' criteria for hours employed or enrolled in school and/or minimum wages, are produced either from the survey data or from employer/school verification mechanisms. QP reports 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.

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

The instruments will be administered as computer-assisted online and telephone interviews. OMB expiration dates will be displayed on the survey screens for the online survey. However, no hardcopy instruments will contain the printed expiration date for telephone interviews. In conducting follow-up activities with employers and schools, it is anticipated that respondents will sometimes prefer to complete a hardcopy version of the instrument rather than an online survey or telephone interview. In such cases, the questionnaire, including the OMB control number and expiration date, is mailed or sent via facsimile to the contact at the employing organization or school for completion.

*18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions,"*

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