

SUPPORTING STATEMENT
Standard Job Corps Contractor Information Gathering
OMB Control No. 1205-0219

This ICR is being submitted in association with the Workforce Innovation and Opportunity Act (WIOA); Final Rule. This ICR adds the regulatory citations from the Final Rule, 20 CFR § 686.945.

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.*

Job Corps is a residential training and employment program administered by the Department of Labor (Department) to address the multiple barriers to employment faced by disadvantaged youth throughout the United States. Job Corps is authorized by Title I, Subtitle C, of the Workforce Innovation and Opportunity Act (WIOA), which superseded the Workforce Investment Act (WIA). The Department is in the process of finalizing regulations implementing WIOA. Once finalized the implementing regulation for the Job Corps program will be found at 20 Code of Federal Regulations (CFR) Part 686. The Job Corps Policy and Requirements Handbook (PRH) also govern administration of the program.

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.

Job Corps is an intensive, residential training program for economically challenged youth aged 16 to 24 who are out of school and out of work. The program is principally carried out through a nationwide network of 126 Job Corps centers located at facilities either owned or leased by the Federal Government.

Job Corps is a unique employment and training program in a number of ways:

- Job Corps is primarily residential; the Department is responsible for the well-being of students on a round-the-clock basis and provides students with food, clothing, medical care, legal services, and other support services in addition to academic education and vocational training.
- Job Corps is mandated as a distinct national program and is not operated through intermediate government levels.

- Interested youth apply to join the program and are screened by an admissions counselor. Section 145 of WIOA describes the preferred outreach admissions organizations and the process of enrolling eligible individuals in the program.
- Job Corps enrollees are usually assigned to centers as close to their home as possible.
- Job Corps enrollees are Federal employees for limited purposes, including under the Internal Revenue Code, Social Security Act, Federal Workers Compensation Act, and the Federal Tort Claims Act.
- Job Corps centers are Federal facilities that are either owned or leased. Section 160(3) (B) of WIOA, for example, authorizes the Secretary of Labor to expend funds for renting and renovating facilities.
- Private entities, including large and small corporations and nonprofit organizations, among other entities are eligible to manage and operate Job Corps Centers.

The Department has a direct role in the operation of Job Corps and does not serve as a pass-through agency for this program. Job Corps centers are established by the Department and it is the responsibility of the Department to select operators for and provide funding to each center. Of the 126 current centers, 27 are managed and operated by the U.S. Department of Agriculture - Forest Service (USDA) through an interagency agreement.

The remaining 99 centers are managed and operated by contractors selected by the Department. These centers are operated by private organizations, including private for-profit companies, in most cases contracted through competitive procurements that are negotiated and conducted in accordance with WIOA, the Competition in Contracting Act, and the Federal Acquisition Regulations (FAR). Many of the current contractors operate more than one center.

To manage the 126 centers, Job Corps must collect information from centers and operators regularly to exercise its federal oversight duties and ensure safe and smooth operation of the program at all centers.

In accordance with 5 CFR 1320, the Department is seeking approval for forms connected with the operation of the 126 Job Corps centers.

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 had made of the information received from the current collection.*

The information collection activities required of Job Corps center contractors, and described below, serve a number of purposes. The operation of the Job Corps program is such that many activities required of contractors must be coordinated with other organizations, both Federal and nonfederal. For example, Job Corps students receive allowance payments through a central system operated under a contract funded by the Department. Center operators are required to collect certain student information in order to coordinate payment of proper allowances for individual students.

Another example is that certain aspects of center operations are not included in the base funding of the contract because they cannot be estimated in advance. These include major medical costs for students, unanticipated transportation costs for students, capital expenditures, and equipment costs. Coordination of these activities, and timely and accurate reporting of these costs, is required between the contractor and the Federal Government to efficiently operate the program.

Most of the information collection requirements of Job Corps center operators described below stem directly from operational needs or are necessary to ensure compliance with Federal requirements and the terms of the contract. Federal staff use the data collected to oversee the operation and effectiveness of the program in a variety of ways. For example, statistical reports (e.g., student characteristics) are normally generated by an automated data system developed by the Federal Government using the data collected as part of this information collection request.

- 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.*

Job Corps has implemented an electronic information system called the Center Information System (CIS). The CIS is an automated application that collects information for managing centers (e.g., student enrollment, student accountability, student finances, student transportation, and the disposition of property). Job Corps has automated the following Employment and Training Administration (ETA) forms: 2110, 2181, 6-131A, 6-131B, 6-131C, 640, 661, and 328.

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

The Department attempts to provide statistical reports directly from system generated data from CIS, rather than requiring intermediate levels of reporting. This allows the National Office of Job Corps to develop national/regional totals on student characteristics, as opposed to requiring Job Corps centers to aggregate student data at their intermediate level.

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

This collection of information does not impact small businesses.

- 6. Describe the consequence to Federal programs or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing them.*

Changes in the frequency of information collection would have serious operational consequences by reducing the Department's ability to effectively administer and oversee the operation of the program.

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

The Department's administration and oversight of the Job Corps program continue to be scrutinized by Congress, the U.S. Government Accountability Office, the U.S. Office of the Inspector General, and other Departmental entities. The most efficient means of overseeing the performance of the program has proven to be through the collection and review of a wide range of data, including the data collected in the various instruments described below. For example, the Department is able to ensure the financial health of the program and the provision of adequate services to the students through collection and analysis of two financial reports - the Center Financial Report (2110), and the Center Operations Budget (2181). Review of these reports, which are submitted on at least a quarterly basis, would immediately show, for example, whether the contractor is providing adequate subsistence levels for students. Consequently, these reports are required more frequently for this purpose.

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 3, 2016 (81 FR 11291). No public comments were received.

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

Other than the remuneration of contractors or grantees, Job Corps does not provide any payment 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.*

Keeping information private with regard to student social security numbers and student records, including student medical records, is covered in WIA and WIOA regulations and the Job Corps PRH. The regulations implementing WIA and WIOA, as well as the PRH, require that all student records be maintained and disclosed in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA). In addition, Privacy Act and HIPAA notices are given and explained to each student, stating explicitly how the information is to be used, who has access, and how it can be released and to whom. In addition, information provided is subject to the rules governing the disclosure of proprietary, business confidential, and procurement sensitive information.

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.

There are no other questions of a possible “sensitive” nature other than what is addressed above.

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

The charts below provide detailed information on the forms. Further explanation of the burden hours is also explained below.

Data collection for the Center Financial and the Center Operations Budget Reports is made at least quarterly, and is essential to ensure contractor financial compliance with contractual requirements and orderly operations of the program. The total burden associated with these activities is 4,536 hours.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Center Financial Report	126	12	1,512	2	3,024		
Center Operations Budget	126	4	504	3	1,512		
Unduplicated Totals	252		2,016		4,536		

*No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding (MUO) with the center operators.

Center staff enters data utilizing a personal computer that transmits the data electronically to a centralized database. Several management and performance reports are created from this database.

Student personnel requirements such as student payroll information, student training and education courses received, student leave, disciplinary actions and medical information are also collected in an electronic information system. The initial data entry is maintained in the national database and used for multiple reporting purposes, thereby reducing the need to enter the data

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more than once. The total burden associated with the input of data to data screens is 36,145 hours.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Disciplinary Discharge	126	86	10,895	1	10,895		
Review Board Hearing	126	86	10,895	1	10,895		
Right to Appeal	126	86	10,895	1	10,895		
Student Profile	126	412	51,912	0.01875	974		
Notice of Termination	126	412	51,912	0.01875	974		
Property Inventory Transcription	126	12	1,512	1	1,512		
Unduplicated Totals	756		138,021		36,145		

*No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding (MUO) with the center operators.

Major record keeping and operational forms that pertain to facility matters are provided in Portable Data Files or PDF format. The total burden for processing these forms is 997 hours.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Inspection of Residential & Educational Facilities	126	4	504	0.5	252		
Inspection of Waste Treatment Facilities	23	4	92	1.25	115		
Inspection Water Supply Facilities	126	4	504	1.25	630		
Unduplicated Totals	275		1,100		997		

*No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding (MUO) with the center operators.

A total of 12,764 burden hours are estimated for preparation of the center plans listed below that are required for the operation of a Job Corps center.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Center Operation Plan	126	1	126	30	3,780		
Center Maintenance Plan	126	1	126	5	630		
Annual CTST	126	1	126	24	3,024		
Annual Staff Training	126	1	126	1	126		
Energy Conservation	126	1	126	5	630		
Outreach/Public Education Plan	126	1	126	2	252		
Health and Wellness Center annual Program Description	126	1	126	0.5	63		
Health Service Utilization Report	126	12	1,512	1	1,512		
Alcohol Testing Report	126	12	1,512	0.08	126		
Immunization Report	126	416	52,416	0.05	2,621		
Unduplicated Totals	1,260		56,322		12,764		

*No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding (MUO) with the center operators.

Total Estimated Burden: 54,442 hours

Job Corps Center Contractor Information Collection Requirements

Federal requirements regarding contractor information collection activities fall into a number of categories. From a burden hour standpoint, burden has been minimized due to the implementation of an automated system, CIS, which has reduced burden to a minimal level by

only requiring key entry by users for data that is already collected.

Information collection activity relates to student enrollment, education, vocational, employment and payroll matters. Other modules within the centralized database contain Portable Document Format (PDF) forms.

Record keeping requirements are contained in the Job Corps PRH, and are incorporated by reference into the contract for 99 contractor operated centers. The remaining 27 centers are operated by the USDA, and are required to report on the same information as the contractor operated centers. Also, the Job Corps centers operated by contractors increased from 97 as last reported to the current number of 99. This has resulted in a net change in the total burden hours last approved.

Automated Data Collection: Data collection for the Center Financial Report (3,024 hours) and the Center Operations Budget Report (1,512 hours) occurs at least quarterly, and is essential to ensuring contractor financial compliance with contractual requirements and orderly operation of the program. Together these reports total 4,536 burden hours.

Center Information Data Collection: Data collected on Forms 6-131A, 6-131B, 6-131C, 640, 661, and 328 that relate to student behavior, including the results of disciplinary actions that were appealed by students and reviewed by a student review board, and the inventory of property, is being collected in CIS from data input screens that electronically transmit the data to a centralized data base. The burden associated with the input of data to the data screens is 36,145 hours.

PDF Forms: Major record keeping and operational forms related to student facility matters are provided in PDF format. The burden for processing these forms is 997 hours.

Center Plans: Approximately 12,764 burden hours are estimated to revise and submit existing center operating plans in addition to Center Maintenance Plans, Annual Career Technical Skills Training (CTST), Annual Staff Training, Energy Conservation, Outreach/Public Education Plans, Health and Wellness Center Annual Program Descriptions, Health Services Utilization Reports, Alcohol Testing Reports, and Immunization Records.

Burden Hours

Automated Forms	4,536
Center Information Data Collection	36,145
PDF Forms	997
Center Plans	12,764

Total Burden Hours **54,442**

The costs to contractors for accomplishing the record keeping requirements listed above is contracted and computed by the Federal government annually. While precise costs cannot be identified, based on past experience, the annual and related costs for contractor staff are estimated to be \$1,524,376 which represents an average cost of \$28.00 per hour.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

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.

The maintenance costs associated with the system are estimated to be \$2.7 million a year for hardware and software. No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding (MOU) with the center operators. Total burden estimates are based on staff experience and consultation with center contractors.

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

There are no program changes or adjustments to the burden.

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.

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

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.

The Department will display the OMB-approved expiration date for the collection of this information. ETA will make notification of the new expiration date through a Job Corps directive, once approved.

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

There are no exceptions.

B. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.