

SUPPORTING STATEMENT
Job Corps Application Data
OMB Control No. 1205-0025

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 the nation's largest residential, educational, and career technical training program for young Americans. Job Corps was established in 1964 by the Economic Opportunity Act and is currently authorized by Title I-C of the Workforce Innovation Opportunity Act (WIOA). For over 52 years, Job Corps has helped prepare nearly three million at-risk young people between the ages of 16 and 24 for success in our nation's workforce. With 123 centers in 50 states, Puerto Rico, and the District of Columbia, Job Corps assists students across the nation in attaining academic credentials, including a High School Diploma (HSD) and/or High School Equivalency (HSE), and career technical training credentials, including industry-recognized certifications, state licensures, and pre-apprenticeship credentials.

Job Corps is a national program administered by the U.S. Department of Labor (DOL) through the Office of Job Corps and six Regional Offices. DOL awards and administers contracts for the recruiting and screening of new students, center operations, and the placement and transitional support of graduates and former enrollees. Large and small corporations and nonprofit organizations manage and operate 97 Job Corps centers under contractual agreements with DOL. These contract center operators are selected through a competitive procurement process that evaluates potential operators' technical expertise, proposed costs, past performance, and other factors, in accordance with the Competition in Contracting Act and the Federal Acquisition Regulations. The remaining 26 Job Corps centers, called Civilian Conservation Centers, are operated by the U.S. Department of Agriculture's Forest Service, via an interagency agreement. The DOL has a direct role in the operation of Job Corps, and does not serve as a pass-through agency for this program.

In accordance with 5 CFR 1320, DOL is seeking approval for forms connected with determining applicant basic eligibility for the Job Corps Program. These forms are the initial forms completed for each applicant. They also provide demographic characteristics for program planning, evaluating and reporting purposes. This activity is the major responsibility of the Job Corps admissions counselor. The forms in this collection are: ETA 652, Job Corps Data Sheet, ETA 655, Statement from Court or Other Agency, and ETA 682, Child Care Certification.

The ETA 652, Job Corps Data Sheet, is used to obtain information for screening and enrollment purposes to determine eligibility for the Job Corps program in accordance with WIOA. It is prepared by the admissions counselor for each applicant and has no further impact on the public. It is critical to the screening process. It also provides demographic characteristics for program

planning and reporting purposes. This data continues to be collected electronically. Data for the form are collected by interview, generally at the admissions counselor's work site.

The information obtained includes age, legal U.S. residency, family income/welfare status, school status, behavior history, parental consent and child care needs of each applicant. The remainder of the form asks for basic information such as name and address, which are already on the ETA 652.

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

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

2. *Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.*

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

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

In order to comply with the Government Paperwork Elimination Act of 1998, Job Corps has reduced the paperwork burden by implementing an electronic system of application data collection for use in determining eligibility for the program. Admissions counselors enter data directly from information provided during interviews with applicants. Behavioral information is entered on the ETA 655 from courts and institutions that provide the information. These records are transmitted electronically to the admissions contractor headquarters for quality control as required, to the appropriate Job Corps center to which applicant has been assigned, and to the Regional Office where appropriate. The database is located at the Job Corps Data Center in Austin, Texas. Further savings in burden are made by having demographic information, such as name and address, automatically printed on all forms where required, after the information is initially entered.

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

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

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

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

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

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

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

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner that requires further explanation pursuant to regulations 5 CFR 1320.5:*

There are no such 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 recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 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.

In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review and comment on this information collection by way of a *Federal Register* notice published on November 29, 2016 (81 FR 86015). One Job Corps contractor submitted comments. Since several of the comments are related to process improvements and/or policy implementation that are currently under consideration at the national level, but not yet finalized; Job Corps will take these recommendations into consideration upon future revisions of this ICR. At this time, the program is requesting an extension to keep the package active until final changes are approved and then a revision request will be made.

DOL maintains regular contact with the Outreach and Admissions contractors, Job Corps centers and the Center Operators, and provides immediate assistance for problems through the Office of Job Corps, which is responsible for defining the business rules and requirements for Job Corps systems.

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

There are no gifts to respondents.

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

The nature of the program requires that sensitive areas be addressed in order to gather information about each applicant's eligibility to receive Job Corps benefits. The Job Corps Privacy Act Statement is given to each applicant. It describes how the information will be used, who has access to it, and how it can be released. Some potentially sensitive items are included on the forms such as welfare status, race, annual income, and history of conviction or delinquency against persons or property. All of these, however, are part of the eligibility equation to determine need and suitability for admission to the program, as required by law. The information sought is essential to the well-being of the Job Corps program and is so mandated by legislation. The information is essential to making eligibility decisions on those applicants with known past behavior problems. Further, keeping information private regarding student social security numbers, and student records, including student medical records, is covered in the Job Corps Policy and Requirements Handbook. The law authorizing this program provides for compliance with the Privacy Act in all its aspects. 20 CFR 670.965, Disclosure of Information, provides instructions as to how to keep the information private which is obtained on each student.

11. *Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the*

questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature.

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

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

The following table can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
ETA 652 Job Corps Application	66,697	1/person	66,697	10 minutes	11,116	\$7.25	\$80,591
ETA 655 Statement from Court	66,697	1/person	66,697	1 minute	1,112	\$7.25	\$8,062
ETA 682 Child Care Certification	6,561	On occasion	6,561	3 minutes	328	\$7.25	\$2,378
Unduplicated Totals	139,955		139,955		12,556		\$91,031

Data Source: Job Corps Database of Program Applicants.

During PY 2015, 66,697 applicants completed applications for Job Corps. The total, as the chart above indicates, for the 3 forms is 12,556 burden hours. Based on the current minimum hourly wage of \$7.25, the cost to applicants is calculated at 12,556 x 7.25 for a total estimated annual participant cost of \$91,031.

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 other costs.

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

The annual cost for contractor staff and related costs is estimated to be approximately \$543,000. There are no added federal costs.

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

There were no program changes. However, the reduction in applicants accounted for reduced hours in #12. During PY 2015, 66,697 applicants completed applications for Job Corps. This number of applications is reduced from the PY2011 figure of 86,581 applicants in the previously approved ICR.

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 (Forms 652 and 682) is aggregated into reports published on Job Corps' public website @ http://www.jobcorps.gov/AboutJobCorps/performance_planning.aspx, and for WIOA required reports to congress.

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

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

The expiration date is displayed.

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.