

**SUPPORTING STATEMENT**  
**Job Corps Placement and Assistance Record**  
**OMB Control No. 1205-0035**

This ICR seeks to revise Form ETA 678 to improve accuracy and simplify data entry.

**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 124 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 98 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.

DOL is seeking approval for the form connected with gathering information about each student's post-center placement outcome after separation from the program. The Workforce Innovation and Opportunity Act (WIOA) Public Law 113-128 Section 159 and 29 U.S.C. 3199 & 3209 requires collection of information related to the placement of Job Corps participants after exit. This form, the ETA Form 678, Job Corps Placement Record, is the only source of information about a student's training and subsequent placement in a job, further education or military service.

- 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.*

The placement of Job Corps students is the primary responsibility of career transition services (CTS) agencies. When the CTS provider places a student, employment data including employer name, date placed, initial wage, etc. is entered into the Job Corps data base as described in #3 below. Data generated from the ETA Form 678 is used to evaluate whether the program meets its goals. At placement, the career transition specialist completes the form, providing placement information.

- 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.*

Job Corps uses a comprehensive electronic data system to provide management information for the program. This system contains subsystems or system applications developed to meet specific program management requirements. One subsystem, the Career Transition System (CTS) collects information necessary for program management and performance reporting for post enrollment placement. The data is entered utilizing a personal computer which transmits the data electronically to a centralized database. From this database many management and performance reports are created. This has resulted in savings of both time and resources.

- 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.*

This is a basic source document which generates all placement information. No other such information is available at the time this document is prepared for each student separating from Job Corps. The purpose of the collection is to gather information about each student's post-center placement outcomes after separation from the program. Therefore, duplication does not occur.

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

This collection does not impact small businesses or other entities.

- 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.*

If this information is not collected, Job Corps cannot comply with regulations and measure program effectiveness.

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 data and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.*

*Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.*

*Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. 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 the Federal Register notice concerning this information collection, which was published on December 9, 2016 (81 FR 89152). No public comments were received.

It is important to note that DOL maintains regular contact with the Job Corps centers and the center operators and Career Transition Services providers for discussions regarding this information collection.

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

There are no payments or gifts to respondents.

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

The Job Corps Privacy Act Statement (PRH Appendix 601) is given to each applicant. It describes how the information will be used, who has access to it, and how it can be released. 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.

SORN DOL/GOVT-2 (Job Corps Student Records) 81 FR 25765 identifies the categories of records in the system containing Job Corps student records including records of a sensitive nature, such as separate running accounts of the students' general biographical data; health (dental, medical, mental health, and drug testing records); administrative records covering data pertaining to enrollment allowances and allotments; leave records.

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.*

Further explanation of the burden hours is explained below.

Respondent Burden:

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

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

**Estimated Annualized Respondent Cost and Hour Burden**

Activity	Number of Respondents	No. of Responses per	Total Responses	Average Burden Per	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA 678 Job Corps Placement Record	34,000	1	34,000	7.43 minutes	4,210	\$28.00	\$117,880

Source: Job Corps Career Transition System (CTS) database.

13. *Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).*

There are no costs to respondents. They are Federal contractors.

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.*

The form is maintained electronically; therefore, there are no printing cost. The Career Transition Services (CTS) specialist completes the ETA 678 electronically for every student who is placed in a job, military or an additional education or training environment. As noted in #12, an estimated 34,000 students are placed on an annual basis. The CTS specialists require approximately 7.43 minutes to complete the form, at an average hourly rate of \$28.00 per hour. Therefore,  $34,000 \text{ (respondents)} \times 7.43 \text{ (minutes)} / 60 \text{ (minutes)} = 4,210 \text{ hours}$ .  $4,210 \text{ hours} \times \$28 \text{ (per hour)} = \$117,880$ . During FY2017, ETA has budgeted \$32,400,000 to operate and maintain the Student Pay Allotment and Management Information System (SPAMIS). Including the subject ICR, this system supports 292,000,000 transactions annually. For administrative purposes therefore the cost allocated to this ICR is estimated to be \$3,773 ( $\$32,400,000 \text{ system cost times } 34,000/292,000,000 \text{ transactions}$ ). Therefore the total Federal cost for this collection is  $\$117,880 + \$3,773 = \$121,653$ .

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

There were revisions made to the ETA 678 to improve data accuracy and simplify data entry.

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 ETA Form 678 is aggregated into reports published on Job Corps' public website @ [http://www.jobcorps.gov/AboutJobCorps/performance\\_planning.aspx](http://www.jobcorps.gov/AboutJobCorps/performance_planning.aspx), and for WIOA required reports to congress.

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

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. Collection of Information Employing Statistical Methods**

This collection does not employ statistical methods.

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