

Justification for Non-Substantive Change to OMB 1290-0012

This memo requests a non-material change to the Paperwork Reduction Act (PRA) package previously approved by the Office of Management and Budget (OMB Control No. 1290-0012) for data collection from February 2017-2020. The purpose for this request is to include three additional sites to the approved data collection activities.

Background

The Cascades Job Corps College and Career Academy (CCCA) Pilot program is implementing innovative and promising models that could improve outcomes for students; particularly youth, ages 16-21. The U. S. Department of Labor (DOL) is conducting an evaluation of the CCCA program, using multiple approaches that include an impact study and implementation analysis. Previously approved ICR (1290-0012) approved collection of baseline data, key informant interviews, and collection of tracking data. With the goal of producing a comprehensive study of CCCA pilot program's implementation and systems work, DOL seeks to extend the already approved data collection instruments to three additional sites and additional interviews at the already approved sites. No other changes to the study are planned.

Reason for non-material change

The Technical Working Group (TWG) recommended that additional implementation visits would enhance and broaden the evaluation's ability to understand and document (a) the extent to which CCCA operates differently from traditional Job Corps centers, and (b) the differences in services received by the treatment group members versus control group members who choose to attend another Job Corps center. The additional interviews at CCCA will provide information on changes in CCCA's staffing structure. Finally, the additional focus groups at CCCA will allow the researches to delve into greater depth about the two separate program offerings at CCCA and will enhance the implementation study. Conducting additional interviews during site visits and analyzing the resulting information would greatly improve DOL's ability to use the CCCA evaluation results for future planning and programming. The proposed change would add 41 additional annual burden hours but no other change to the study.

Data Collection Activities and change in burden

This submission therefore requests a modest increase in burden for additional interviews using a subset of the previously approved instruments. This increase will allow for additional implementation site visits and interviews with site staff.

In February 2017, OMB approved the following information collections:

- Baseline Information Form (BIF)
- Interview Protocol – Academy Director, College and Career Dean, and College Preparation Manager
- Interview Protocol – Admission and Placement Director and Placement Officer
- Interview Protocol – IT Pathway Manager and Healthcare Pathway Manager
- Interview Protocol – Social Development Director
- Interview Protocol – Skagit Valley College Liaison and Sedro-Wooley School District Liaison
- Interview Protocol – Employer Calls
- Interview Protocol – Other Center Directors

- Interview Protocol – Student Focus Group
- Follow-up Tracking Form

This submission is requesting increase burden for a subset of the original information collections:

- Interview Protocol – Academy Director, College and Career Dean, and College Preparation Manager:
- Interview Protocol – IT Pathway Manager and Healthcare Pathway Manager
- Interview Protocol – Social Development Director
- Interview Protocol – Student Focus Group

Under the expanded effort, the study team will visit three additional Job Corps centers, in addition to the two visits already approved. The additional burden will include twenty-four additional interviews and three additional focus groups of approximately twenty students each. The additional burden will allow the evaluation to include in-person interviews with the center directors, the college and career deans, the college preparation managers, the training pathway managers (e.g., the director of healthcare training and the director of IT training), the social development directors and focus groups with students. The expansion to include these respondents is of particular interest to both the program and evaluation teams at DOL. The site visits to additional Job Corps centers would enhance the ability of the evaluation to understand and document (a) the extent to which CCCA operates differently than traditional Job Corps centers, and (b) the differences in services received by the treatment group members versus control group members who choose to attend another Job Corps center.

Additionally, the Department seeks approval to conduct interviews with additional CCCA staff and students. These additional interviews are needed due to changes in CCCA's staffing structure that have added more staff than the Department originally knew about. The additional effort at CCCA includes 2 additional Social Development Directors (for a total of three). The Department also requests approval to conduct focus groups with 30 additional students at CCCA so that students in the Healthcare and Information Technology tracks can be placed in separate focus groups and allow the researchers to better understand each of the separate program offerings.

Burden Change

This burden estimate reflects an increase of 41 annual hours resulting from the increases in the interview protocols for (1) Academy Director, College and Career Dean, and College Preparation Manager; (2) IT Pathway Manager and Healthcare Pathway Manager; (3) Social Development Director and (4) Student Focus Group. The revised burden estimates in Table 1 reflect the combined effect of the change in estimate for the previously-approved CCCA visit (due to unanticipated changes in staffing at CCCA) and the discretionary request to add three site visits to additional (non-CCCA) Job Corps centers. For example, the requested increase from .33 to 4 annual respondents for the Interview Protocol for the Social Development Director includes both the increase from 1 to 3 respondents at CCCA (where three staff are covering the duties of a position originally covered by 1 staff person), plus an additional 9 respondents (3 each at 3 non-CCCA site visits) (e.g., 12 respondents total/3 years=4 annual respondents).

Table 1. Revised Estimated Annualized Respondent Burden Hours

Instrument	Annual Number of Respondents	Number of Responses Per Respondent	Total Number of Responses	Average Burden Hours Per Response (in Hours)	Total Annual Burden Hours
Baseline Information Form (BIF)	733 ^a	1	733	0.33 ^b	242
Interview Protocol – Academy Director, College and Career Dean, and College Preparation Manager	4	1.25	5	1.5	8
Interview Protocol – Admission and Placement Director and Placement Officer	0.67	1.5	1	1.33	1
Interview Protocol – IT Pathway Manager and Healthcare Pathway Manager (use for Training Pathway Managers at Traditional Centers)	2.67	1.25	3	1	3
Interview Protocol – Social Development Director	4.00	1.25	5	1	5
Interview Protocol – Skagit Valley College Liaison and Sedro-Wooley School District Liaison	0.67	2	1	0.5	1
Interview Protocol – Employer Calls	1	1	1	0.5	1
Interview Protocol – Other Center Directors	1	2	2	1	2
Interview Protocol – Student Focus Group	40	1	40	1	40
Follow-up Tracking Form	733 ^a	1.5 ^c	1,100	0.1	110
Total	1,520	--	1,891	--	413

^a This includes 2,200 participants (1,100 treatment and 1,100 control group members) enrolled into the impact study over a three year period. A response rate of 100% is expected for the BIF.

^b We assume that 25% of the BIF data elements will be provided by the Job Corps' national MIS and thus create no burden for respondents. These elements are indicated with asterisks (*) on the accompanying BIF. Thus, the burden estimate applies only to new elements that are not available from the Job Corps' national MIS.

^c We will request tracking information six times for each study participant; based on previous experience, we expect 25% of study participants will respond to each tracking attempt. This 25% response rate to 6 tracking attempts equates to $(6 * 0.25) = 1.5$ average responses per respondent.

Table 2: Original (Approved) Burden Estimates
Estimated Annualized Respondent Burden Hours

Instrument	Number of Respondents	Number of Responses Per Respondent	Total Number of Responses	Average Burden Hours Per Response (in Hours)	Total Burden Hours
Baseline Information Form (BIF)	733 ^a	1	733	0.33 ^b	242
Interview Protocol – Academy Director, College and Career Dean, and College Preparation Manager	1.00	2	2	1.5	3
Interview Protocol – Admission and Placement Director and Placement Officer	0.67	1.5	1	1.33	1
Interview Protocol – IT Pathway Manager and Healthcare Pathway Manager	0.67	2	1	1	1
Interview Protocol – Social Development Director	0.33	2	1	1	1
Interview Protocol – Skagit Valley College Liaison and Sedro-Wooley School District Liaison	0.67	2	1	0.5	1
Interview Protocol – Employer Calls	1	1	1	0.5	1
Interview Protocol – Other Center Directors	1	2	2	1	2
Interview Protocol – Student Focus Group	10	1	10	1	10
Follow-up Tracking Form	733 ^a	1.5 ^c	1100	0.1	110
Total	---	---	1852	---	372

^a This includes 2,200 participants (1,100 treatment and 1,100 control group members) enrolled into the impact study over a three year period. A response rate of 100% is expected for the BIF.

^b We assume that 25% of the BIF data elements will be provided by the Job Corps' national MIS and thus create no burden for respondents. These elements are indicated with asterisks (*) on the accompanying BIF. Thus, the burden estimate applies only to new elements that are not available from the Job Corps' national MIS.

^c We will request tracking information six times for each study participant; based on previous experience, we expect 25% of study participants will respond to each tracking attempt. This 25% response rate to 6 tracking attempts equates to $(6 * 0.25) = 1.5$ average responses per respondent.