

Supporting Statement
Student Safety Assessment of Job Corps Centers
OMB Control Number 1205-0NEW

A. Justification.

The Department of Labor's Office of Job Corps (OJC) is seeking approval from the Office of Management and Budget (OMB) for a new Student Safety Assessment. The collection of information through this assessment is necessary for program evaluation to gauge active students' sense of safety and security at centers on a monthly basis.

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 transferred from the Office of Economic Opportunity to the Department of Labor in 1969. In 1978, Job Corps was authorized as part of the Comprehensive Employment and Training Act under Title IV-B. 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 six regional offices and 121 Job Corps centers nationwide.

Most Job Corps students live on campus, but at 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 youth 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, healthcare, and other supportive services.

Measuring Job Corps student safety is paramount for several reasons. First, the program is residential and includes minors. Therefore, centers must ensure that measures are in place to provide students with a safe environment at all times. Additionally, unlike many federal programs, the Department of Labor's Office of Job Corps contracts directly with the companies that operate the centers. The Job Corps management and contract officials must be able to determine if the center operators are fulfilling their contractual obligations. One obligation is providing a safe environment for program students.

The Student Safety Assessment (SSA) is a new instrument that partially replaces the current Student Satisfaction Survey (SSS). Whereas the SSS collected information about the student's satisfaction with the program including safety, the SSA was developed to focus entirely on student safety. The SSA questions are about violence, drugs and alcohol availability and use on center, and the climate of the center. Job Corps students are afforded an opportunity through the SSA to express any concerns or issues about their safety and provide more information for federal managers and center operators to provide better oversight. Job Corps is developing a new version of the satisfaction portion of the SSS and is submitting a separate collection request for OMB approval.

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.

As the nation's largest and most comprehensive residential education and job training program for at-risk youth, the Office of Job Corps must monitor the safety of all Job Corps centers. As stated in the Workforce Innovation and Opportunity Act (WIOA) of 2014, Sec 159 (b)(2) and (f) (1), and Code of Federal Regulation §686.100, the program must evaluate the centers at least every three years and assess centers' performance annually. An important part of the evaluation and assessment is ensuring operators provide a safe environment for students which is of paramount importance to the program. For this purpose, the new SSA is a necessary data collection instrument that will be used monthly. In fact, it will be one of Job Corps' emerging and most important management tools to frequently and directly collect data from active students about their safety.

Furthermore, the SSA will be used to determine elements of center safety and security that was previously measured by the Student Satisfaction Survey. Based on Job Corps program requirements, known as the Policy Requirements Handbook (PRH), the center safety and security is part of the Center Quality Assessment. The SSA improves on the safety questions that were included in the SSS by broadening their scope and the depth. This allows for a more robust measure of the safety of the Job Corps students.

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.

Because Job Corps is a federal program that provides services mainly through contracts it is critical that federal managers at the Department of Labor have effective tools to ensure the safety and security of the program. The U.S. Department of Agriculture, Forest Service (USDA FS), runs twenty-four (24) Job Corps centers. The USDA FS has an additional layer of federal staff that must monitor their center performance, just like DOL Job Corps federal staff. The National Office of Job Corps (NOJC) and the regional offices who manage the individual centers, including the USDA FS centers, will use the Student Safety Assessment. The NOJC management will use the SSA to ensure that Job Corps operators, including the USDA FS, fulfill the requirement of providing a safe environment for program students. Additionally, center operators and staff to gauge their effectiveness at providing a safe training environment and determine corrective actions will use the SSA.

The SSA is a new instrument that partially replaces the current Student Satisfaction Survey. The SSS results were received and used by the Office of Job Corps, including national and regional staff and the managers of the Job Corps centers.

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 SSA will be conducted via a Web-based survey that can be completed on any Internet enabled device. This format will reduce the burden for SSA participants, provide more accurate data collection, and improve the ability to analyze trends and provide results quickly.

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.

Because the SSA will replace the safety related questions from the SSS, it will be the only instrument used to collect student perceptions of safety and security on Job Corps centers. The other information about center safety is provided by the center operators' reports, including Significant Incident Reports and reported Behavior Infractions. Although this center operator provided safety information is related to questions within the SSA, they are not directly reflective of Job Corps student's perceptions.

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. The contractors that operate Job Corps centers will only have to notify and encourage the students to take the survey. It places no burden on businesses that have not accepted a Job Corps contract.

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.

The SSA is the only method of obtaining first-hand information about student's perceptions of safety and security during their Job Corps experience. This information is vital to program management and adverse risk reduction. Reducing the frequency or eliminating this collection would seriously impair oversight efforts.

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. Special circumstances in 5 CFR 1320.5 are as follows:

- * Requiring respondents to report information to the agency more often than quarterly;*
- * Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- * Requiring respondents to submit more than an original and two copies of any document;*
- * Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*

- * In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- * Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- * That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- * Requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

These data collection efforts do not involve any special circumstances. The Student Safety Assessment is completely voluntary. Respondents are never required to report information.

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 allowed 60 days to comment through the *Federal Register* notice posted on July 5, 2019 (84 FR 32221). No public comments were received and the collection has not changed.

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

The U.S. Department of Labor will not make any payment or gift to respondents for completing the survey.

10. Describe any assurance of confidentiality 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 managing 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 Job Corps Data Center (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 are housed on a central server, in a secured computer room in a locked building on a 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 JCDC 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 survey is voluntary. Only aggregated results will be shared. Their individual responses are private. The results will be used to determine the safety of the center; it is not a reflection of the survey participants. The survey provides the students with a hotline number if they need to report an immediate safety concern.

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 aggregation of data, the data presented in any cell table will most likely represent information from many more observations. A center report will not be provided to the center if less than ten students complete the survey.

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.

The Student Safety Assessment does not ask students to report their own behaviors, including sexual behaviors and attitudes, religious beliefs, or substance use or abuse. The survey does include questions about a students' knowledge of violent and disruptive behaviors, substance use, and other rule violations at the center. These questions are required to determine the level of safety at the Job Corps centers. The SSA is voluntary. Job Corps students can choose not to complete the survey if they object to the questions.

*12. Provide estimates of the hour burden of the collection of information. * Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.*

** If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.*

** Provide estimates of annualized cost to respondents for the hour burdens for collections of*

information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under “Annual Cost to Federal Government.”

This data collection is a monthly process that supports the administration of approximately 9,317 Job Corps online surveys. The average amount of time to complete the survey is about 15 minutes. The combined annual respondent burden with this data collection effort is estimated at approximately 34,989 hours, as shown in Table 1.

Table 1: Estimates of Respondent Burden Average Time

Activity	Number of Respondents *	Frequency	Total Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Wage Rate	Monetized Value of Respondent
SSA Survey	11,663	Monthly	139,956	.25	34,989	NA*	NA*
Totals	11,663	Monthly	139,956	.25	34,989		

* Respondents can take the survey more than once during their enrollment based on sampling.

The survey will be sent to a maximum of 14,579 students per administration; the number of surveys will vary based on the size of the student population at the centers at the time of the survey. If all Job Corps centers were at their contracted on-board strength (OBS) and all students responded (14,579), the burden would be 3,645 hours. However, with 80 percent response rate of the maximum size, there would be 11,663 respondents with a burden of 2916 hours. The total annual estimated number of respondents is 139,956 with a burden of 34,989 hours.

**There will be no cost to respondents. The survey will occur during their active enrollment in Job Corps.*

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.

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 annual cost to administer the Student Safety Assessment is \$374,137. This includes the costs of time and materials for contractor personnel to prepare the survey; process and analyze the data; provide monthly and quarterly reports; maintain a dashboard that allows for easy monitoring of the SSA results nationally, regionally, and by center; and ensure that response rates are at acceptable levels through trainings and materials.

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

This is a new information collection request.

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 will not be published publically.

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 online and will include the OMB expirations dates.

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."