

Supporting Statement
Student Experience Assessment of Job Corps Centers
OMB Control No. 1205-0NEW

A. JUSTIFICATION

The Department of Labor's (DOL) Office of Job Corps (OJC) is seeking approval from the Office of Management and Budget (OMB) for a new Student Experience Assessment (SEA) Survey. The collection of information through this assessment is necessary for program evaluation to gauge active students' satisfaction with the program.

Job Corps is the nation's largest and most comprehensive residential education and job training program for at-risk youths, ages 16 through 24. The Economic Opportunity Act of 1964 originally established Job Corps. 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 authorized Job Corps in 1978. 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. Several centers are hosting pilot programs or temporarily closed; at this time, there are 116 Job Corps centers that will receive the satisfaction survey.

Job Corps students require further education and technical training. Most Job Corps students live on campus, but at some centers youth from local areas can commute to center 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, health care, and other supportive services.

Measuring Job Corps students' experiences with those services is paramount for several reasons. First, the program is residential and individualized. Therefore, centers must ensure that measures are in place to provide students with the training that meets the students' needs. 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. An essential obligation is providing students quality services that meet their needs.

The Student Experiences Assessment (SEA) is a new instrument that partially replaces the current Student Satisfaction Survey (SSS). Whereas the SSS collected information about the student's access to different aspects of the program, the SEA questions are more in-depth. The survey asks about the quality of the students' current services. This allows Job Corps students an opportunity to express any concerns or issues about their experiences and satisfaction and provides more information for OJC and center operators to provide better oversight. Job Corps is

developing a new version of the safety portion of the SSS and it was submitted in 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. A key aim of the evaluation is to ensure operators provide the contracted services to the participants. The Student Experience Assessment (SEA) is a necessary data collection instrument because it will be the only method of regularly and directly collecting data from the program participants about their experiences in the program. Contractors with a fiscal incentive not to share unappealing information run most Job Corps centers. It is imperative to collect data directly from the students. Every center has a Regional Office Center Assessment (ROCA) at least twice during their five-year contract period. The ROCA will use the results from the SEA. In fact, it will be one of Job Corps' emerging and most important management tools to directly collect the data from active students about their experiences.

The SEA has undergone pre-testing cognitive testing to ensure that the survey uses an appropriate reading level, the correct jargon, and flows for both questions and instructions. The survey is ready for use nationally. The national roll-out may result in minor changes in survey instructions or information provided to centers; however, we anticipate no substantial changes. If the Office of Job Corps identifies any substantial changes in the method or instrument to be made, OJC will submit a change request.

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—rather than grants and/or directly to students—it is critical that federal staff at the Department of Labor can monitor the program. The U.S. Department of Agriculture, Forest Service (USDA FS), runs 26 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 Experience Assessment (SEA). The NOJC management will use the SEA to ensure that Job Corps operators, including the USDA FS, fulfill the requirement of providing a rich program for students that meets their needs. Additionally, center operators and staff will use survey results to gauge their effectiveness at providing a safe training environment and to guide determination of corrective actions.

The SEA is a new instrument that partially replaces the current Student Satisfaction Survey (SSS). 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 to manage the 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.

The Student Experience Assessment (SEA) will be conducted via a Web-based survey that can be completed on any Internet enabled device. Additionally, the SEA is computer-adaptive to further minimize the burden. Students will only complete the sections of the survey relevant to their current point in the program. This format will reduce the burden for SEA participants, provide more accurate data collection, and improve the ability to 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.

The SEA is the only first-hand account by the current Job Corps students about their experiences and satisfaction at Job Corps centers. Twice every five years, regional federal staff conduct a Regional Office Center Assessment (ROCA). Aside from the ROCAs, the staff and administration at Job Corps centers provide all other information about their program. The Job Corps management is dependent on centers reporting issues involving programming that may harm the reputation of their center. There is a financial incentive for centers to under-report. Additionally, the center staff must be aware of issues in order to report them. In conclusion, there is no other way to accurately measure student satisfaction with center programs on a regular basis.

The SEA is not a duplicate of another data collection, and it is necessary to provide an accurate and consistent description of the programming at each center.

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 be required to 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.

Reducing the frequency or length of the survey reduces the information available to the Office of Job Corps, which limits their ability to ensure that all students are receiving the required

services. There is no other reliable information available regarding student satisfaction with the center programs. Contractors, who are fiscally incentivized to not share unappealing information, run most Job Corps centers. Job Corps students are typically 16 to 24 years old and living on center and, in some cases, they are hundreds of miles from their homes. The Student Experience Assessment (SEA) is the only method of obtaining first-hand information about the students' experiences and satisfaction with the program.

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

- *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 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 data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secret, 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 Experience 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

A 60-day Federal Register Notice in support of this information collection request was published in the *Federal Register* on August 9, 2019 (84 FR 39374). No comments were received.

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 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. Two-factor authentication, application level user IDs and passwords, and specific permission applied at the database level all provide additional security. 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 satisfaction of the center; it is not a reflection of the survey participants. The survey provides the former 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 fewer 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 SEA 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 students' experiences and satisfaction with the components of the Job Corps program. The SEA is voluntary. At any time, 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.

This data collection is a quarterly process that supports the administration of approximately all Job Corps students. The current number of students is 37,417 contracted on-board strength (OBS). The average amount of time to complete the survey is about 20 minutes. The combined annual respondent burden with this data collection effort is estimated at approximately 39,513 hours based on an 80% response rate, as shown in Table 1.

Table1: Estimates of Respondent Burden Average Time

Activity	Number of Respondents	Expected Number of Respondents (based on 80% response rate)	Frequency	Total Annual Responses (based on response rate)	Time Per Response (hours)	Total Annual Burden (Hours)	Hourly Rate	Monetized Value of Time
Per administration based on Contracted OBS	37,417	29,934	4	119,736	.33	39,513	-	\$0
Unduplicated Totals	37,417	29,934	-	119,736	-	39,513	-	\$0

If all Job Corps centers were at their contracted On Board Strength and all students responded, the burden would be 37,417 students for 12,472.33 hours quarterly. However, with 80 percent response rate of the maximum size, there would be 29,934 respondents with a burden of 7,483 hours quarterly.

There will be no cost to respondents. The survey will occur during their active enrollment in Job Corps and their Job Corps pay will not be interrupted. Therefore, there will be no loss of income.

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). The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and

explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

** Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.*

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 annual cost of the quarterly administration of the SEA to all Job Corps centers is estimated to be \$154,133. This includes the costs of time and materials for contract employees to prepare the sample; administer the survey; process and analyze the data; provide quarterly reports; maintain a dashboard that allows for easy monitoring of the SEA results nationally, regionally, and by center; and ensure that response rates are at acceptable levels through trainings and materials. The cost for contract employees is derived from contract budget information specific to this task.

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

This is a new submission and therefore, there are no changes.

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.

Not applicable. 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.

Not applicable. The instruments will be administered online and will include the OMB expiration dates.

18. Explain each exception to the topics of the certification statement identified in

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“Certification for Paperwork Reduction Act Submissions,”

Not applicable. No exceptions are requested in the "Certification of Paperwork Reduction Act Submissions."