

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

This information collection request (ICR) seeks to renew the Job Corps Placement and Assistance Record (ETA Form 678).

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). Since its inception, Job Corps has helped prepare over three million at-risk young people between the ages of 16 and 24 for success in our nation's workforce. With 121 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. In addition, Job Corps provides the necessary assistance and support to ensure that eligible students leaving the Job Corps program are placed into a job, the military, or additional training, and that program graduates receive the support necessary to retain employment long-term.

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 95 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. Two centers are operated under demonstration grant arrangements. The remaining 24 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 Job Corps Placement Record (ETA Form 678), which gathers information about each student's post-center placement outcomes 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. The ETA Form 678 is the primary source of information about

a student's training, subsequent placement, and continued employment 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) providers. When the CTS provider places a student, employment data (e.g., employer name, date placed, initial wage, etc.) is entered into the Job Corps database as described in #3 below. Data generated from the ETA Form 678 is used to evaluate whether the program has met its goals. At placement, the CTS provider completes the form and provides placement information. After placement, this form may be used to provide information on placement upgrades and continued employment during the CTS service period.

- 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.*
- * 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.*

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 Thursday, January 2, 2020 (85 FR 132). There were no public comments.

It is important to note that DOL maintains regular contact with the Job Corps center operators and CTS 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; and 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.*

* 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.”

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 hour	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA Form 678 Job Corps Placement Record	34,000	1	34,000	7.43 minutes	4,210	\$28.00*	\$117,889

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

*The rate is based on data obtained from contract rates for CTS providers.

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).

* 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 respondents. They are Federal contractors. See section 12 and 14 for a breakdown of these costs.

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 costs. The CTS provider completes the ETA Form 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, $34,000 \text{ (respondents)} \times 7.43 \text{ (minutes)} / 60 \text{ (minutes)} = 4,210 \text{ hours}$. $4,210 \text{ hours} \times \$28 \text{ (per hour)} = \$117,889$.

During FY2019, ETA has budgeted \$51,000,000 to operate and maintain the Student Pay Allotment and Management Information System (SPAMIS). Including the subject ICR, this system supports 240,000,000 transactions annually. For administrative purposes, therefore, the cost allocated to this ICR is estimated to be \$7,225 ($\$51,000,000 \text{ system cost times } 34,000/240,000,000 \text{ transactions}$). Therefore, the total Federal cost for this collection is $\$117,889 + \$7,225 = \$125,114$.

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

There are no material changes or adjustments to the burden.

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 (<https://www.jobcorps.gov/>) and 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.