

SUPPORTING STATEMENT
Job Corps Application Data
OMB Control No. 1205-0025

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) (29 U.S. Code § 3196). For over 55 years, 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.

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 applicants, 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 agreements. 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.

In accordance with 5 CFR 1320, DOL is seeking approval for data collection to obtain necessary information from each applicant to the Job Corps program. These forms collect initial data to determine eligibility, collect socio-demographic characteristics and employment barrier information that are required for reporting under the Workforce Innovation Opportunity Act (WIOA), and used for program planning, evaluation and reporting purposes. This activity is the major responsibility of Job Corps admissions counselors. The forms in this collection are ETA 652 - Job Corps Applicant Data Sheet, ETA 655 -Statement from Court or Other Agency, and ETA 682 - Child Care Certification.

The ETA 652, Job Corps Applicant Data Sheet, is critical to the screening process. This form is used to collect information from applicants for screening and enrollment purposes to determine eligibility for the Job Corps program in accordance with WIOA. It is prepared by the admissions

counselor for each applicant and has no further impact on the public. It also collects socio-demographic characteristics and information on employment barriers for program planning, evaluation and reporting purposes. This data continues to be collected electronically. Data for the form are collected by interview, generally at the admissions counselor's work site.

In addition to an applicant's basic contact information, the ETA 652 collects date of birth, place of birth, race/ethnicity, sex, legal residency type, criminal history, income eligibility, employment history, military experience, social services received, education, and family/child care of each applicant. The form has been updated with this revision request to obtain more detailed information necessary to meet WIOA mandated reporting requirements, align with recommendations from the Office of the Inspector General (OIG) and reflect Job Corps eligibility requirements as defined in current policy.

The ETA 655, Statement from Court or Other Agency, collects information for determining applicant background, in compliance with WIOA and Job Corps policy. The Job Corps admissions counselor, if applicable, collects it for the applicant from the appropriate agency.

The ETA 682, Child Care Certification, used to certify an applicant's arrangements for dependent children while the applicant is in Job Corps.

- 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.*

Job Corps Admissions Counselors collect these data via interview, generally at the Admissions Counselor's work site.

The information gathered through these forms is used to determine an applicant's eligibility for the Job Corps program. Additionally, data captured through the ETA 652 are included in the PIRL data file required by DOL for reporting program outcomes.

- 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.*

In order to comply with the Government Paperwork Elimination Act of 1998, Job Corps has reduced the paperwork burden by implementing an electronic application collection system for use in determining eligibility for the program and in compliance with WIOA reporting requirements on student demographics. Admissions counselors enter data provided during interviews with applicants for the ETA 652 directly into the electronic Outreach and Admissions Student Input System (OASIS). If an applicant is subject to the ETA 655, courts and institutions provide the information and admissions counselors key enter the information into the relevant OASIS screens. The data entered into OASIS are stored in an IQ Warehouse located at the Job Corps Data Center in Austin, Texas. Job Corps centers to which students have been assigned

then access the applicant's information from the electronic database. Further savings in burden are made by having demographic information, such as name and address, automatically printed on all forms where required, after the information is initially entered.

Student records are consolidated into one database. This has provided a seamless record for each student from application through post-placement follow-up and has effectively eliminated much duplication of data.

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.*

Due to the nature of the activity, duplication is minimal. One application must be completed for each person who applies to Job Corps. The forms have no cycle and are used only as the individual situation dictates (e.g., only applicants with dependent children must complete an ETA 682, Child Care Certification). Unless the legislation is changed, the frequency, nature, and use of this information will remain unchanged. In terms of duplication, once basic information (name and address) is entered, it is automatically carried to other forms, as appropriate.

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

Small businesses collect the data as part of their contract, but the information is gathered from individuals (applicants).

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.*

These are basic source documents. No other information is available to Job Corps admissions staff at the time these documents are prepared. The information must be obtained to determine each applicant's eligibility to receive the benefits of Job Corps.

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 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 given 60 days to review and comment on this information collection by way of a *Federal Register* notice published on Wednesday, January 8, 2020 (85 FR 935). There were no public comments.

DOL maintains regular contact with the Outreach and Admissions contractors, Job Corps centers and the Center Operators, and provides immediate assistance for problems through the Office of Job Corps, which is responsible for defining the business rules and requirements for Job Corps systems.

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

There are no gifts to respondents.

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

Applicants are required to meet eligibility requirements to receive Job Corps benefits. The Job Corps Privacy Act Statement is given to each applicant. It describes how application

information will be used, who has access to it, and how it can be released. Some potentially sensitive items are included on the forms such as income, citizenship status, date of birth, and any criminal history. All such information is required by law to determine eligibility for Job Corps. Additionally, keeping information private, which also includes social security numbers, prior educational records, and prior medical records, is covered in the Job Corps Policy and Requirements Handbook. The law authorizing Job Corps 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, which is obtained on each student private.

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."*

See the chart below for the listing of forms, by number, number respondents, hours per submission, and total annual burden hours. Further explanation of the burden hours is explained below.

The following table represents the burden of this information collection.

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
ETA 652 Job Corps Application	66,630	1/person	66,630	10 minutes	11,105	\$7.25	\$80,511
ETA 655 Statement from Court	66,630	1/person	66,630	1 minute	1,111	\$7.25	\$8,055
ETA 682 Child Care Certification	6,554	On occasion	6,554	3 minutes	328	\$7.25	\$2,378
Unduplicated Totals	139,814		139,814		12,544		\$90,944

Data Source: Job Corps Database of Program Applicants.

During PY 2018 66,630 applicants completed applications for Job Corps. The total burden, as the chart above indicates, for the three forms is 12,544 hours. Based on the current minimum hourly wage of \$7.25, the total estimated cost to applicants is \$90,938. The federal minimum wage provisions are contained in the Fair Labor Standards Act (FLSA) <https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/FairLaborStandAct.pdf> .

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 other costs.

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. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost for contractor staff and related costs is estimated to be approximately \$543,000. There are no added federal costs.

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

There were no program changes and the number of estimated applicants is based on PY 2018 data, which is relatively unchanged from the currently approved collection at 66,630 vs 66,697.

The changes to the ETA 652 include:

- Revision and expansion of data collected on the applicant's employment history to align with recommendations from the OIG to increase the relevance of data collected for post-separation placement outcomes. The data to be collected are: employment status at time of application; current and previous employer names; and hourly wage, estimated hours per week, and months employed under each of these employers. Additionally, a field to collect information on the applicant's receipt of unemployment compensation has been added to meet the requirements to report on a corresponding data element in the DOL Participant Individual Record Layout (PIRL) used for calculating performance outcomes required by WIOA and DOL.
- Revision and expansion of data collected on the applicant's current or prior military experience. This data will be collected to meet the requirement to report on corresponding data elements in the PIRL used for calculating performance outcomes required by WIOA and DOL. These data are: prior military; eligible veteran status; campaign veteran; disabled veteran; homeless veteran; date of military separation; transitioning member; and covered person entry date.
- Revision and expansion of data collected related to the applicant's receipt of specific welfare benefits to meet the requirement to report on corresponding data elements in the PIRL used for calculating performance outcomes required by WIOA and DOL. The data to be collected are: Temporary Assistance for Needy Families (TANF); supplemental security income; social security disability income; and receipt of cash assistance through General Assistance or Refugee Cash Assistance.

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 these collections (Forms 652 and 682) is aggregated into reports, which are always available and published on Job Corps' public website at: <https://www.jobcorps.gov/job-corps-reports>, and for WIOA-required reports to congress. There are no plans to publish data from ETA Form 655 (Statement from Court or Other Agency).

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 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. Collections of Information Employing Statistical Methods

This information collection does not employ statistical methods.