

SUPPORTING STATEMENT
Job Corps Enrollee Allotment Determination
OMB Control No. 1205-0030

This information collection request (ICR) seeks to extend without change, Office of Management and Budget authorization for this information collection under the Paperwork Reduction Act (PRA).

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). 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 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 25 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 20 CFR 686.62, 20 CFR 670.965, 5 CFR 1320, and Section 3196 of the Workforce Innovation and Opportunity Act, DOL is seeking approval for a form which collects information necessary to provide allotments for students who have a qualifying dependent. This form, the Job Corps Enrollee Allotment Determination (ETA 658), is used to initiate allotments from a Job Corps student's bi-weekly allowance for a qualified dependent.

- 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 purpose of the form is to obtain the necessary information and documentary evidence from a Job Corps enrollee with a qualified dependent to support their claim for the allotment. The form is completed by either the Job Corps outreach/admissions counselor or the center staff and signed by the student during a personal interview.

- 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 Center Information System (CIS), collects information for managing Job Corps centers (e.g., student enrollment, student accountability, student finances, student transportation, and the disposition of property). Since the implementation of CIS, the Office of Job Corps has automated the collection of all required center-related information electronically. 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.*

Duplication of this activity is minimal because the process used to prepare this form is seamless and unique to each Job Corps student applying for dependent allotments. It is prepared either at the screener's or the center's contact point, but not both. Since the student's identification number is unique, duplication is limited to errors made in preparation

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

This document 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, ETA cannot comply with section 686.62 of the Workforce Innovation and Opportunity Act (WIOA) which allows Job Corps students to designate allotments from their bi-weekly allowance for qualified dependents.

- 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 through a Federal Register notice published on February 5, 2020 (85 FR 6578). No comments were received.

It is important to note that DOL maintains regular contact with the Job Corps centers and the center operators and Career Transition Services providers and solicits continuous feedback on its information collection systems.

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; leave records. Respondents are not required to retain these 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 for this collection.

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 can be used as a guide to calculate the total burden of an information collection.

Activity	Number of Respondents	Frequency of Reporting	Total Annual Responses	Time Per Response per hour	Total Annual Burden	Hourly Rate*	Monetized Value of Respondent
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					(Hours)		Time
ETA 658 Job Corps Allotment Request	1,749	1/person On occasion	1,749	3 minutes	87	\$7.25	\$631

Data Source: Center Information System (CIS)

Respondent Burden:

1,749 respondents x 3 minutes = 5,247 minutes / 60 minutes = 87 Hours.

Because respondents are students, ETA has assigned a value of \$7.25 per hour (federal minimum wage). \$7.25 x 87 = \$631.

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. 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 or costs for Federal staff. 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 the system maintenance cost allocated to this ICR is estimated to be \$372 (\$51,000,000 system cost times 1,749/240,000,000 transactions). Therefore the total Federal cost for this collection is \$2,436 + \$372 = \$ 2,808.

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

There are no adjustments to the burden estimate.

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.*

This information is not collected for publication.

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 will be 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.