

**SUPPORTING STATEMENT**  
**Standard Job Corps Contractor and Grantee Information Gathering**  
**OMB Control Number 1205-0219**

This Information Collection Request (ICR) seeks OMB approval for a revision to the currently approved ICR that expires in September 2022. Revisions include the following updates:

- Form ETA-9190 (used to collect information necessary for reporting under the Workforce Innovations and Opportunity Act (WIOA) and the grant Funding Opportunity Announcements (FOA)) was updated to capture applicants' first and last names, the option for applicants to not disclose their gender, and the date first reported to placement for separated students. Additionally, this revision updated these forms to include form numbers.
- An increase in the burden hours for forms ETA-9190 due to the addition of the number of demonstration grant recipients under the Job Corps Scholars Program grant.
- A new form ETA-9192 to collect center-level information primarily related to academic instruction, testing and planning to inform decisions on and understanding of the academic programs offered through Job Corps and collect data to be used in the development of model-adjusted goals for the High School Diploma/High School Equivalent Attainment measure in Job Corps' Outcome Measurement Systems. Additional information is collected regarding driver's license programs and Registered Apprenticeship program opportunities to help direct programmatic initiatives.
- Readjustments to burden hours as a result of a complete review of this collection.

**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 and most comprehensive residential education and job training program for opportunity youth, ages 16 through 24. The Economic Opportunity Act of 1964 originally established Job Corps. The program was transferred from the Office of Economic Opportunity to the Department of Labor in 1969. Job Corps was later authorized as part of the Comprehensive Employment and Training Act (1978) under Title IV-B, and 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 6 regional offices and 121 Job Corps centers nationwide.

The regulatory citations are detailed below:

**686.945** Provides the procedures for the management of Job Corps student records. These can be found in the Department of Labor's (Department) Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student records management of student records. The

Department's Secretary issues guidelines for a system for maintaining records for each student during enrollment and for disposition of such records after separation.

The Department has a direct role in the operation of Job Corps and does not serve as a pass-through agency for this program. The Department establishes Job Corps centers and it is the responsibility of the Department to select operators for and provide funding to each center. Of the 121 current centers, 24 are managed and operated by the U.S. Department of Agriculture - Forest Service (USDA) through an interagency agreement. Of the remaining centers, 95 are managed and operated by contractors selected by the Department and an additional two are being operated under demonstration grants. The 95 centers are operated by private organizations, including private for-profit companies, in most cases contracted through competitive procurements that are negotiated and conducted in accordance with WIOA, the Competition in Contracting Act, and the Federal Acquisition Regulations. Many of the current contractors operate more than one center. The two centers operated under demonstration grants are run by the State of Idaho and the National Guard Job Challenge program respectively. Additionally, there are 26 public colleges and universities operating Job Corps Scholars Program demonstration grants.

**686.565** Authorizes Job Corps to conduct experimental, research and demonstration projects related to the Job Corps program according to WIOA sec. 156(a), provided that such projects are developed, approved, and conducted in accordance with policies and procedures developed by the Secretary.

To manage the program, Job Corps must collect information from center operators and grantees regularly to exercise its federal oversight duties and ensure safe and smooth operation of the program. In accordance with 5 CFR 1320, the Department is seeking approval for forms connected with the operation of the Job Corps centers and oversight of projects under 686.565.

- 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 had made of the information received from the current collection.*

The information collection activities required of Job Corps operators and grantees, as described below serve a number of purposes. The operation of the Job Corps program requires that many activities be coordinated with other organizations, both Federal and non-federal. For example, Job Corps students receive allowance payments through a central system operated under a contract funded by the Department. Center operators are required to collect certain student information in order to coordinate payment of proper allowances for individual students.

Another example is that certain aspects of center operations are not included in the base funding of the contract because they cannot be estimated in advance. These include major medical costs for students, unanticipated transportation costs for students, capital expenditures, and equipment costs. Coordination of these activities and timely and accurate reporting of these costs are required between the operators and the Federal government to efficiently operate the program.

Most of the information collection requirements of Job Corps operators described below stem directly from operational needs or are necessary to ensure compliance with Federal performance

reporting requirements and the terms of their contract or grant. Federal staff use this data to oversee the operation and effectiveness of the program in a variety of ways. Student demographics, attendance, learning gains, high school diploma/high school equivalency, career technical training completion, and credential attainment are included in this category. These data are normally collected and reports generated by automated data systems developed by the Federal government.

- 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.*

Job Corps has implemented electronic information systems designed to gather the data necessary for program management and financial accountability to include the Center Information System (CIS), the Financial Management System (FMS), the Construction, Rehabilitation and Acquisition System (CRA) and the Job Corps Fund Allocation System (JFAS) and the Grant Data Collection Tool (GDC). The CIS is an automated application that collects information for managing centers (e.g., student enrollment, student accountability, student finances, student conduct, and student transportation). The FMS is an automated application that collects information related to center operations budget and cost reports and the disposition of property. The GDC collects information similar to the CIS from grantees.

The JFAS is used to control the allocation of funds to center operations contracts and other contract activities. The CRA system provides the mechanism for collecting Job Corps center construction, maintenance and repair activities. Job Corps has automated the following Employment and Training Administration (ETA) forms: 2110, 2181, 6-131A, 6-131B, 6-131C, 640, 661, and 328.

The Grantee Data Collection (GDC) system collects grantee data for the purposes of reporting performance results in compliance with the requirements in the Funding Opportunity Announcements (FOA) and WIOA. This system automates ETA forms 9190-A, 9190-B and 9190-C thereby reducing repetition and burden, and streamlining data collection.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified to use for the purposes described in Item 2 above.*

There is no other existing source of data containing similar information. The CIS, FMS, CRA and JFAS systems have been developed exclusively for the purpose of accountability, performance reporting and oversight of the Job Corps program. The Department provides statistical and financial reports directly from system generated data from these sources rather than requiring intermediate levels of reporting. This allows the National Office of Job Corps to develop national/regional totals on student characteristics and outcomes and cost and budget allocations. Additionally, the GDC synthesizes data across grantees into a simple format for calculating performance results as required under the Funding Opportunity Announcement

(FOA) and WIOA.

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

This collection of information does not affect small businesses.

6. *Describe the consequence to Federal programs or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing them.*

Changes in the frequency of information collection would have serious operational consequences by reducing the Department's ability to effectively administer and oversee the operation of the Job Corps program and comply with financial reporting requirements.

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.*

The Department's administration and oversight of the Job Corps program continues under the scrutiny of Congress, the U.S. Government Accountability Office, the U.S. Office of the Inspector General, and other Departmental entities. The most efficient means of overseeing the performance of the program has proven to be through the collection and review of a wide range of data, including the data collected in the various instruments described below. For example, the Department is able to ensure the financial health of the program and the provision of adequate services to the students through collection and analysis of two financial reports - the Center Financial Report (2110), the Center Operations Budget (2181), and the US DOL ETA Financial Report (9130). The financial report 9130 is approved under OMB 1205-0461. Review of these reports, which are submitted on a quarterly basis or as necessary, would immediately show, for example, whether a center operator is providing adequate subsistence levels for students. Consequently, these reports are required more frequently for this purpose.

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 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 (PRA) 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 Friday, November 19, 2021(86 FR 64959). One public comment was received which was determined to be non-substantive. DOL maintains regular contact with the representatives of the program who must compile the records associated with this collection.

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

Other than the remuneration of contractors or grantees, Job Corps does not provide any payment 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.*

Keeping information private with regard to student social security numbers and student records, including student medical records, is covered in WIOA regulations, the Job Corps PRH and the Department of Labor's Privacy Act SORN DOL/GOVT-2, Job Corps Student Records. The regulations implementing WIOA and the PRH require that all student records be maintained and disclosed in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA). In addition, Privacy Act and HIPAA notices are given and explained to each student, stating explicitly how the information is to be used, who has access, and how it can be released and to whom. In addition, information provided is subject to the rules governing the disclosure of proprietary, business confidential, and procurement sensitive information.

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 other questions of a possible "sensitive" nature other than what is addressed above.

12. *Provide estimates of the hour burden of the collection of information.*

### **Job Corps Center Operator and Grantee Information Collection Requirements**

Federal requirements regarding contractor information collection activities fall into a number of categories. From a burden hour standpoint, burden has been minimized due to the implementation of automated systems (CIS, FMS, CRA, JFAS and GDC) which only require entry by users for data that is already collected. Some information collection activities relate to student enrollment, education, vocational, employment and payroll matters. Some modules within the centralized database produce reports on Portable Document Format (PDF) forms which report the data collected in the system.

Record keeping requirements are contained in the Job Corps PRH, and are incorporated by reference into the contract for 95 contractor-operated centers. The remaining 24 centers are operated by the USDA, and are required through an interagency agreement with the Department of Labor to report on the same information as the contractor operated centers. Record keeping requirements for grantees are contained within the grant documents.

**Automated Data Collection:** Data collection for the Center, Staff Vacancy, and Grantee Financial Reports (4,122 hours) and the Center Budget Reports (1,476 hours) occurs at least quarterly, and is essential to ensuring financial compliance with contractual/grant requirements and orderly operation of the program. Together these reports total 5,598 burden hours.

**Center Information Data Collection:** Data collected on Forms 6-131A, 6-131B, 6-131C, 640 and 661, which relate to student profiles, behavior and separations including the results of disciplinary actions are being collected in CIS from data input screens that electronically transmit the data to a centralized database. Grantee data collection will occur separately through the GDC. The burden associated with the input of data to the data screens is 58,240 hours.

**PDF Forms:** Major record keeping and operational forms related to student facility matters are provided in PDF format. They are OJC 6-36, 6-37, 6-38, and 6-39. The burden for processing these forms is 661 hours.

**Center Plans:** Approximately 9,567 burden hours are estimated to revise and submit existing Center Operating Plans in addition to Center Maintenance Plans, Construction and Rehabilitation Reports, Property Inventory Reports, Annual Career Technical Skills Training (CTST), Annual Staff Training, and Annual Center Academic Programs Review and Planning Report. Along with the Health and Wellness Center Annual Program Descriptions, Alcohol Testing Reports, Immunization Records, the total burden for collecting these reports is 19,053 hours.

The charts below provide detailed information on the forms. Further explanation of the burden hours is also explained below.

**Financial Information:** Data collection for the Center and Grantee Financial and the Center Operations Budget Reports is made at least quarterly, and is essential to ensure contractor

Standard Job Corps Contractor Information Gathering  
 OMB Control No. 1205-0219  
 September 2022

financial compliance with contractual requirements and orderly operations of the program. The total burden associated with these activities is 5,082 hours.

Required Activity	ETA Form Number	Number of Respondents (one person per center/grant)	Number of Responses per Respondent	Total Responses	Average Burden (hours)	Total Burden (hours)	Hourly Wage Rate	Monetized Value of Burden
Center Financial Report	2110	121	12	1,452	2	2,904	\$28.00	\$81,312.00
Center Vacancy Separation Report	2110 S	121	12	1,452	0.5	726	\$28.00	\$20,328.00
Center Operations Budget	2181	121	4	484	3	1,452	\$28.00	\$40,656.00
<b>Unduplicated Total</b>	-	<b>363</b>	-	<b>3388</b>	-	<b>5082</b>	-	<b>\$142,296.00</b>

Note: Burden calculations based on Program Year 2017 data and estimates of grant requirements.

**Student Enrollment Management Information:** Center and grantee staff members enter the data electronically to a centralized database. Several management and performance reports are created from this database. Student personnel requirements such as student payroll information, student training and education courses received, student leave, disciplinary actions and medical information are also collected and maintained electronically in the Center Information System (CIS). Total burden associated with these activities is 58,240 hours.

Required Activity	ETA Form Number	Number of Respondents (one person per center/grant)	Number of Responses per Respondent	Total Responses	Average Burden (hours)	Total Burden (hours)	Hourly Wage Rate	Monetized Value of Burden
Disciplinary Discharge	6-131A	121	97	11,737	1	11,737	\$28.00	\$328,636.00
Review Board Hearings	6-131B	121	97	11,737	1	11,737	\$28.00	\$328,636.00
Rights to Appeal	6-131C	121	97	11,737	1	11,737	\$28.00	\$328,636.00
Student Profile	640	121	349	42,229	0.15	6,335	\$28.00	\$177,380.00
Grant Data Collection Form	9190-A	28	1500	42,000	0.1	4,200	\$28.00	\$117,600.00
	9190-B	28	1100	30,800	0.1	3,080	\$28.00	\$86,240.00
	9190-C	28	1100	30,800	0.1	3,080	\$28.00	\$86,240.00
Student Separation	661	121	349	42,229	0.15	6,334	\$28.00	\$177,352.00
<b>Unduplicated Total</b>	-	<b>689</b>	-	<b>223,269</b>	-	<b>58,240</b>	-	<b>\$1,630,720.00</b>

Standard Job Corps Contractor Information Gathering  
 OMB Control No. 1205-0219  
 September 2022

Note: Burden calculations based on Program Year 2017 data and estimates of grant requirements.

**Facilities Information:** Major record keeping and operational forms that pertain to facility matters are provided in Portable Data Files or PDF format. The total burden for processing these forms is 1,273 hours.

Required Activity	ETA Form Number	Number of Respondents (one person per center/grant)	Number of Responses per Respondent	Total Responses	Average Burden (hours)	Total Burden (hours)	Hourly Wage Rate	Monetized Value of Burden
Environmental Health Inspections	OJC 6-36	121	4	484	1	484	\$28.00	\$13,552.00
Inspection of Residential and Educational Facilities	OJC 6-37	121	4	484	1.25	605	\$28.00	\$16,940.00
Inspection of Waste Treatment Facilities Cost	OJC 6-39	23	4	92	1	92	\$28.00	\$2,576.00
Inspection of Water Supply Facilities	OJC 6-38	23	4	92	1	92	\$28.00	\$2,576.00
<b>Unduplicated Total</b>	-	<b>288</b>	-	<b>1,152</b>	-	<b>1,273</b>	-	<b>35,644.00</b>

Note: Burden calculations based on Program Year 2017 data and estimates of grant requirements.

**Plans and Reports:** We estimate 19,045 burden hours for preparation of the center plans listed below that are required for the operation of a Job Corps center.

Required Activity	ETA Form Number	Number of Respondents (one person per center)	Number of Responses per Respondent	Total Responses	Average Burden (hours)	Total Burden (hours)	Hourly Wage Rate	Monetized Value of Burden
Center Operations Plan	PRH Required	121	1	121	30	3,630	\$28.00	\$101,640.00
Construction and Rehab Report (CRA)	PRH Required	121	4	484	2	968	\$28.00	\$27,104.00
Center Preventive Maintenance Plan (CRA)	PRH Required	121	1	121	2	242	\$28.00	\$6,776.00
Annual CTST	PRH Required	121	1	121	24	2,904	\$28.00	\$81,312.00
Annual Staff Training	PRH Required	121	1	121	1	121	\$28.00	\$3,388.00
Health and Wellness Center Annual Program	PRH Required	121	1	121	1	121	\$28.00	\$3,388.00

Standard Job Corps Contractor Information Gathering  
 OMB Control No. 1205-0219  
 September 2022

Description								
Alcohol Testing Report	PRH Required	121	12	1,452	0.2	290	\$28.00	\$8,120.00
Immunization Record	PRH Required	121	375	45,375	0.2	9,075	\$28.00	\$254,100.00
Property Inventory	PRH Required	121	12	1,452	1	1,452	\$28.00	\$40,656.00
Annual Center Academic Programs Review and Planning Report	ETA-9192	121	1	121	2	242	\$28.00	\$6,776.00
<b>Unduplicated Total</b>	-	<b>1,210</b>	-	<b>49,489</b>	-	<b>19,045</b>	-	<b>\$533,260.00</b>

Hourly rate can vary widely depending on many important factors, including education, certifications, additional skills and the number of years you have spent in your profession. While precise costs cannot be identified, based on past experience, the annual and related costs for contractor and grantee staff are estimated to be \$2,341,920 which represents an average cost of \$28.00 per hour.

Activity	No. of Respondents	No. of Responses per Respondent	Total Responses	Average Burden (Hours)	Total Burden (Hours)	Hourly Wage Rate	Monetized Value of Burden
Financial Information	363	-	3388	-	5082	\$28.00	\$142,296.00
Student Enrollment Management Information	689	-	223,269	-	58,240	\$28.00	\$1,630,720.00
Facilities Information	288	-	1,152	-	1,273	\$28.00	\$35,644.00
Plans and Reports	1,210	-	49,489	-	19,045	\$28.00	\$533,260.00
Unduplicated Total	2,550	-	277,298	-	83,640	-	\$2,341,920.00

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

There are no other 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. Agencies also

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

The maintenance costs associated with the system are estimated to be \$2.7 million a year for hardware and software. No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding with the center operators. Total burden estimates are based on staff experience and consultation with center contractors.

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

The previously approved forms ETA Forms 9190-A, 9190-B and 9190-C, a series of Grant Data Collection forms. These forms collect demonstration grant applicants' demographic information. The Department of Labor is funding 26 demonstration sites under Job Corps Scholars Program grants and requires the reporting of data within the GDC system for calculating the performance outcomes required under their FOA and WIOA. This revision updated these forms to include form numbers.

Additionally, Job Corps has included a new form, the ETA-9192, Annual Center Academic Programs Review and Planning Report, to this request to collect, annually, information from academic centers on their current and future plans for academic programs related to both attaining learning gains and completing an academic credential. This form will collect information that cannot be captured through existing data systems or other sources. The information collected will allow Job Corps to better understand the academic landscape, including barriers to academic credential attainments, academic instructional needs, requirements and barriers around TABE testing used for attaining Educational Functional Level gains reported under WIOA, and future planning needs around attainment of High School Diploma credentials or recognized equivalents. No individual student-level data will be collected; all data will be aggregated or at the center-level.

The previously approved total annual burden hours were 81,516 hours, and this request notes 83,640 hours. An increase of 3,124 hours, which is all attributed to the new form.

*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 are aggregated into reports published on Job Corps' public website (listed below) and for WIOA required reports to congress.  
<https://www.jobcorps.gov/job-corps-reports>

*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 Department will display the OMB-approved expiration date for the collection of this information. ETA will make notification of the new expiration date through a Job Corps directive, once approved.

*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.