

**SUPPORTING STATEMENT FOR
COVID-19 Symptom Tracker for Students, Emotional Wellness Form for Students, and
Student Vaccination Status and Test Consent Form Collection**

OMB CONTROL NO. 1205-0548

This ICR is a request for a revision to a currently approved ICR. This ICR was initially approved under the Emergency Processing Provisions under the PRA for six months and expires on April 30, 2022. This ICR is essential to the mission of the ETA in 1) collecting data to assess the impact of COVID-19 and steps to prevent infection, and 2) supporting efforts in the reduction of the risk and spread of COVID-19 among Job Corps students and staff.

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 training program, serving a unique cross-section of opportunity youth. Our students include young people who did not complete high school, individuals who are housing insecure, runaways, and individuals with disabilities. The program also waives some requirements to encourage the enrollment of victims of human trafficking. U.S. Department of Labor regulations for the Workforce Innovation and Opportunity Act (WIOA) – Job Corps' authorizing statute – require Job Corps to provide medical, dental, and mental health care services to students during the program. 20 CFR § 686.530(d). Many of these young people enter the program having experienced inconsistent access to healthcare over the course of their lives. Accordingly, Job Corps collects thorough health information on each of its students to determine what health supports its centers can provide during the program minimize the safety risk of communicable disease among our students while they live on center.

Among this health information is the collection of medical records verifying what immunizations a student has received prior to Job Corps and an authorization that Job Corps administer any age-appropriate vaccination recommended by the Centers for Disease Control and Prevention (CDC). This information and authorizations are gathered through ETA Form 653: Student Health Questionnaire (OMB Control No. 1205-0033: Job Corps Health Questionnaire) and recorded in the Student Health Record, part of ETA 640 (OMB Control No. 1205-0219: Standard Job Corps Contractor Information Gathering). Thus, this collection supplements Job Corps' existing health collections to gather information that will allow Job Corps to safely mitigate the spread of COVID-19 and protect the safety and health of students during the ongoing pandemic.

Specifically, this collection includes three forms:

1. **Form ETA 9194: Job Corps COVID-19 Student Symptom Tracker and Attestation:** This mandatory form collects information on whether students are experiencing symptoms consistent with COVID-19. This form ensures each center has a full daily picture of who might be experiencing COVID-19 symptoms so it can carry out COVID-19 safety protocols.
2. **Form ETA 9196: Student Daily Emotional Wellness Checklist:** Like other Americans, Job Corps students have suffered significant stress due to the COVID-19 pandemic and compliance with the careful distancing and masking requirements Job Corps installed to ensure student safety. This voluntary form helps assess students' mental health so that Job Corps can provide any additional supports to assist them during this difficult time.
3. **Form ETA 9197: Student COVID-19 Vaccine Certification, Authorizations, and Acknowledgements and Testing Consent:** This mandatory form collects an attestation as to student vaccination status modeled off the Certification of Vaccination (OMB Control No. 3206-0277) form for Federal employees, contractors, and visitors to Federal workspaces. Similar to that form, Job Corps will use a student's attestation to determine what COVID-19 safety protocols the student must follow while living or learning on center. However, to align with existing Job Corps policy on vaccination, this form authorizes the collection of information verifying vaccination where a student has indicated full or partial vaccination against COVID-19 and explains the steps necessary for Job Corps to gather this information. This approach maximizes transparency with our students given heightened public sensitivity and misinformation about COVID-19 vaccination and provides clarity and uniformity to Job Corps centers regarding the methods of collection and verification. This form also includes a consent to testing as recommended by the CDC and, if necessary, surveillance testing required by Job Corps policy for partially vaccinated students, unvaccinated students, and students who decline to answer as to vaccination status.

For students who are unvaccinated, partially vaccinated, or declining to answer as to vaccination status, this form also obtains acknowledgement that they will be subject to heightened COVID-19 safety protocols, including weekly testing, until they submit a form indicating they are fully vaccinated. For these students, this form also includes acknowledgements that students will not be punished for their vaccination certification, as well as information as to how Job Corps will facilitate vaccination if they later choose to receive vaccination. Similar to the above, this approach is intended to maximize transparency and provide consistent information to our students on COVID-19 vaccination and how vaccination status may affect their time during the program.

Job Corps needs this information to safely and effectively provide Job Corps' opportunities to its unique cross-section of opportunity youth, who have been underserved during the pandemic. Collecting the fullest information possible to prevent COVID-19 infection is the safest way of providing the full opportunities of Job Corps residential and non-residential students during the pandemic.

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.

1. **Form ETA 9194: Job Corps COVID-19 Student Symptom Tracker and Attestation:** This mandatory form collects information on whether students are experiencing symptoms consistent with COVID-19. Job Corps center operators use this form to determine whether students are showing symptoms of COVID-19 and should be tested and/or isolated on center or, if non-residential, return home to avoid spread of the virus.
2. **Form ETA 9196: Student Daily Emotional Wellness Checklist:** Like other Americans, Job Corps students have suffered significant stress due to the COVID-19 pandemic and compliance with the extremely careful distancing and masking requirements Job Corps installed to ensure student safety. Job Corps center operators use this voluntary form to assess student's mental health so that Job Corps can provide any additional supports to assist them during this difficult time.
3. **Form ETA 9197: Student COVID-19 Vaccine Certification, Authorizations, and Acknowledgements and Testing Consent:** This mandatory form collects an attestation as to student vaccination status modeled off the Certification of Vaccination (OMB Control No. 3206-0277) form for Federal employees, contractors, and visitors to Federal workspaces. Similar to that form, Job Corp centers use a student's attestation to determine what COVID-19 safety protocols the student must follow while living or learning on center. However, to align with preexisting Job Corps policy on vaccination, this form authorizes the collection of information verifying vaccination where a student has indicated full or partial vaccination against COVID-19 and explains the steps necessary for Job Corps to gather this information. This approach maximizes transparency with our students given heightened public sensitivity and misinformation about COVID-19 vaccination. It also provides students clarity on how Job Corps will use their COVID-19 vaccination information.

Consistent with this transparency, for students who are unvaccinated, partially vaccinated, or declining to answer as to vaccination status, this form also obtains student acknowledgement that they will be subject to heightened COVID-19 safety protocols, including weekly testing, until they submit a form indicating they are fully vaccinated. For these students, this form also includes acknowledgements that students will not be punished for their vaccination certification, as well as information as to how Job Corps will facilitate vaccination if they later choose to receive vaccination.

Finally, this form also includes a consent to testing as recommended by the CDC and, if necessary, surveillance testing required by Job Corps policy for not fully vaccinated and non-residential students. This ensures Job Corps operators have consent to perform testing needed to detect and mitigate the spread of COVID-19.

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 centers employ a variety of methods to collect this information. Centers are encouraged to utilize Google forms; however, some use hard copies and others have developed an app to collect information. The app is the most user-friendly and least time-consuming approach to collecting this information.

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 A.2 above.

These collections provide daily monitoring of student COVID-19 symptoms and monitoring of the potentially harmful mental health impacts of any necessary quarantine and isolation on students. It also allows COVID-19 vaccination collection for students in alignment with existing Job Corps policies collecting records of vaccinations, while also providing transparency to students as to how COVID-19 vaccination will affect their day-to-day interactions with the Job Corps program and uniformity to centers as to how to collect and verify the students' COVID-19 vaccine information. Job Corps' other health collection forms do not provide for symptom or voluntary mental health tracking tailored to the COVID-19 pandemic. While ETA Form 653 authorizes Job Corps to administer vaccinations recommended by the CDC, the vaccination certification form collects information specific to COVID-19 vaccine status for students modeled off of the OMB common form for Federal employees and contractors.

For each student, Job Corps adds all of these completed forms and COVID-19 vaccination records to the Student Health Record. All student information must comply with PRH Appendix 202, which provides detailed requirements for safeguarding health and disability information.

COVID-19 vaccination information for students is used on center for determining COVID-19 vaccination status and what safety protocols apply to students. COVID-19 testing information is used to determine if a student is infected with COVID-19 and what steps must be taken to mitigate or prevent its spread.

Students who refuse COVID-19 testing will not be permitted to participate in on-center activities and will remain in distance learning status (Present for Duty Off-Center). Centers alert the local health department and follow any necessary contact tracing procedures for COVID-19 for positive COVID-19 tests.

For vaccinated students, Job Corps align protocols for these students to present CDC guidance for vaccinated people. While these students are subject to testing if they exhibit COVID-19, they

are not subject to the same higher-level masking, quarantine, and weekly testing requirements of unvaccinated students, unless they have had a close-contact exposure necessitating enhanced safety protocols, or where present CDC guidance may conflict. If vaccinated students refuse testing in this situation, they are required to isolate or quarantine instead. Requests for accommodation due to a disability or a sincerely held religious belief, practice, or observance is determined on a case-by-case basis.

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

Some Job Corps operators are small businesses or small entities. To minimize impact on these entities, Job Corps used the following techniques:

- **Consolidation:** The Vaccine Certification form combines a vaccine attestation form with material on consents and acknowledgements that otherwise could have been covered in multiple additional forms.
- **Simplification:** The Symptom Tracker and Emotional Wellness forms are one- to two-page forms that simplify collection of an extensive list of symptoms and thus streamline the routing of needed student medical and mental health supports. Additionally, data from Symptom Tracker and Emotional Wellness forms are not reported to the Office of Job Corps and are used only on-center instead, avoiding the burden of detailed, daily reporting.

Furthermore, Job Corps covers most costs associated with this collection, including the cost of procuring COVID-19 testing supplies, minimizing expense and burden placed on small businesses and entities operating Job Corps centers.

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.

Symptom Tracker and Attestation: This information is necessary for collection; students may enter Job Corps centers with symptoms of COVID-19 or an exposure to COVID-19. It is imperative that information is collected daily as COVID-19 is a highly contagious disease and the regular collection of this information will help minimize the chances of exposure or an outbreak. Collecting daily information about COVID-19 symptoms and exposure has become a standard in schools, workplaces, and businesses to prevent the spread of COVID-19.

Emotional Wellness Checklist: Isolation and quarantine, while imperative to stop the spread of COVID-19, take a toll on emotional health. Job Corps Center Mental Health Consultants uses this checklist on a daily basis as a means of identifying opportunities to provide students with appropriate mental health services.

Student COVID-19 Vaccine Certification, Authorizations, and Acknowledgements and Testing Consent: Without testing information, Job Corps is not able to determine whether a

student has COVID-19, a highly dangerous communicable disease, and what steps it must take to minimize spread and protect students and staff. Without vaccine information, Job Corps cannot tailor each student's interaction with the program in a way that maximizes the health and safety of the student and all others living, learning, and working at Job Corps centers. Furthermore, without this form, Job Corps cannot collect COVID-19 vaccination information in a way that is built to accommodate and address the unique informational needs and challenges of this pandemic, including heading off misinformation and determining whether an individual is only partially vaccinated. It also provides centers a uniform method of collection and verification of student vaccine status.

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 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 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.**

Information is reported daily as symptoms of COVID-19, exposure to COVID-19, and emotional wellbeing of those in quarantine and isolation fluctuates daily. Vaccination status is not collected daily; however, students will have to complete new forms if their vaccination status changes, such as when they have received shots to reach partial or full vaccination. Quarterly information does not protect the health and wellbeing of the Job Corps community.

Daily symptom tracking is necessary regardless of vaccine status because of the transmissibility of some variants of COVID-19 by vaccinated individuals.

Due to the nature of COVID-19, 30 days does not be an adequate frequency to collect testing or symptom tracking information. Information changes day-to-day about students experiencing symptoms of COVID-19, students exposed to COVID-19, and individual student emotional wellbeing. Monthly information does not protect the health and wellbeing of the Job Corps community. Further, daily symptom tracking is necessary regardless of vaccine status because of the transmissibility of some variants of COVID-19 by vaccinated individuals.

Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, will be collected on separate forms. All such information, whether in hard copy, electronic, or both, is maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they are locked or otherwise secured.

8. If applicable, provide a copy and identify the date and page number of publications 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 allowed 60 days to comment through the *Federal Register* notice posted on Monday, December 20, 2021 (86 FR 71928). 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.

The Symptom Tracker and Attestation is based on CDC guidance on collecting information on COVID-19 symptom information and exposure in schools and business. Because COVID-19 is a highly communicable disease, daily collection of this information is necessary to safely

manage Job Corps facilities, including targeted cleaning and determining when and where to house and quarantine students to avoid COVID-19 infection and minimize the spread of COVID-19 infection.

Job Corps also consulted the *Equal Employment Opportunity Commission (EEOC) What You Should Know about COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws* webpage. The EEOC provides guidance on collecting and storing information on COVID-19 symptoms and exposure. In collecting this information, Job Corps is abiding by all applicable collection and storage laws.

COVID-19 can affect youth and young adults directly and indirectly. Beyond getting sick, the pandemic has impacted many young adults' social well-being and mental health. The CDC encourages parents and adults serving youth and young people to recognize social and emotional challenges and help ensure their well-being. The Emotional Wellness Checklist assists Job Corps in meeting this recommendation and identifying students in need of support.

Vaccination collection is needed to determine the best protocols to provide to students to ensure their protection during this pandemic. Unvaccinated people are at greater risk of more severe disease and hospitalization from COVID-19. Additionally, the overall lower risk of infection for vaccinated individuals means vaccinated students do not have to quarantine or isolate as frequently or as long, decreasing the risk of negative mental health impacts. In determining the best path forward, Job Corps consulted recent OMB guidance on collecting vaccine attestations from Federal employees and contractors, as well as information about mandates instituted by large corporate employers. It also consulted its long-established policies on collecting vaccine records, and how operators have applied these policies in practice, to determine the best approach for collecting COVID-19 vaccination records.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

There will be no additional payments or gifts associated with this collection.

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

Job Corps staff have received training on keeping this information confidential and sharing only with people with a need-to-know, including health and wellness staff and dormitory staff, for residential students. Job Corps staff have received training on programming Google Forms and sharing access to forms only as necessary. Additionally, staff have received training that included the need to store any paper-based forms or checklist in a secure location in the Health and Wellness Center (for students) or in Human Resources, Administration, or Security (for staff). Emotional Wellness Questionnaires will only be accessed by licensed health professionals, including the Center Mental Health Consultant and nurses. Any medical or disability-related information obtained about a particular individual, including information that could lead to the disclosure of a disability, will be collected on separate forms. All such information, whether in

hard copy, electronic, or both, will be maintained in one or more separate files, apart from any other information about the individual, and treated as confidential. Whether these files are electronic or hard copy, they are locked or otherwise secured.

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.

The Symptom Tracker and Attestation asks about symptoms of COVID-19 and exposure to COVID-19. These questions are necessary to minimize the risk of students with COVID-19 interacting with others on center. This information is used to ensure people with COVID-19 symptoms or exposure do not enter the centers. Students returning to Job Corps have been informed of these requirements and the need to answer the questions honestly.

The Emotional Wellness Questionnaire asks questions regarding how a student is currently feeling. This information will be viewed only by the Center Mental Health Consultant, or a nurse in the absence of a Center Mental Health Consultant. There is an explanation for students located on the form. It is optional for students to complete and is a basic form that does not seek disability-related information from students.

The Vaccine Certification and Consent Form's collection of COVID-19 diagnostic information is necessary to determine whether the highly communicable and dangerous disease has spread into Job Corps' largely residential setting, as well as provide information needed to contain such an infection. Job Corps' longstanding policy has been to collect all vaccination information on its students to best protect its student populations from communicable diseases that can spread quickly in residential living environments. Collection of COVID-19 vaccination information through the Certification Form is needed in particular to best ensure the health and safety of Job Corps students regardless of vaccination status. Knowing vaccination status allows Job Corps to install safety protocols that can protect unvaccinated students—including those unable to vaccinate because of immunodeficiency—since they are at higher risk of a more severe form of COVID-19, if infected. Additionally, the overall lower risk of infection for vaccinated individuals means vaccinated students do not have to quarantine or isolate as frequently or as long, decreasing the risk of negative mental health impacts.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **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.**
- **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 in Item 14.**

Estimated Respondent Cost and Hour Burden

| Activity | Form Number | No. of Respondents | No. of Responses per Respondent | Total Responses | Average Burden (Hours) | Total Burden (Hours) | Total Burden Cost |
|---|--------------------|---------------------------|--|------------------------|-------------------------------|-----------------------------|--------------------------|
| COVID-19 Symptom Tracker -- Students | ETA 9194 | 20,000 | 365 | 7,300,000 | 0.33 | 2,409,000 | N/A |
| COVID-19 Emotional Wellness -- Students | ETA 9196 | 20,000 | 365 | 7,300,000 | 0.33 | 2,409,000 | N/A |
| Student Vaccination Certification and Testing Consent | ETA 9197 | 20,000 | 4 | 80,000 | 0.33 | 26,400 | N/A |
| Unduplicated Totals | | 60,000 | | 14,680,000 | | 4,844,400 | N/A |

Students: There will be no cost to student respondents. The collection will occur during their active enrollment in Job Corps and their Job Corps pay will not be interrupted and therefore, there will be no loss of income.

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 startup cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service 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 collection 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.

14. Provide estimates of the 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 into a single table.

There are no costs to the Federal Government.

15. Explain the reasons for any program changes or adjustments.

The burden was updated to reflect annual burden numbers rather than the six-month burden numbers approved under the emergency approval. The language in Attachment C: Student COVID-19 Vaccine Certification, Authorizations, and Acknowledgements and Testing Consent was updated to refer to “up-to-date COVID-19 vaccinations” rather than “fully vaccinated”.

16. For collections of information whose results will be published, outline plans for tabulations, 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.

The results of this collection will not be published.

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.

N/A

18. Explain each exception to the certification statement.

N/A

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS.

This collection does not employ statistical methods.