

Justification for Non-Substantive Change

The Department is submitting a non-material /non-substantive change request to Employment and Training Administration (ETA) Information Collection Request (ICR), 1205-0548, COVID-19 Symptom Tracker for Students, Emotional Wellness Form for Students, and Student Vaccination Status and Test Consent Form Collection. Specifically, ETA would like to update language on the Form 9197, Job Corps COVID-19 Symptom Tracker and Attestation, to include a “fully vaccinated” option in line with current Centers for Disease Control and Prevention (CDC) and Safer Federal Workforce Taskforce guidance. As further discussed below, the Department is not making any program changes to the other form associated with this collection at this time.

The Job Corps program consolidated its COVID-19 policies and aligned the policies with the CDC Guidance for Institutions of Higher Education (IHE). The CDC defines “up to date” as “a person has received all recommended doses in their primary series of COVID-19 vaccine and one booster dose when eligible.”¹ The Job Corps program also follows the Safer Federal Workforce Taskforce guidance in applicable circumstances, such as masking in federal facilities and guidance for federal contractors. Because the Safer Federal Workforce Taskforce guidance continues to use “fully vaccinated” for some COVID-19 mitigation strategies and the CDC continues to use the term “fully vaccinated” to track vaccine status, it is important for the Job Corps program to continue to track students who are “fully vaccinated” but not yet “up to date” as defined by the CDC.

In accordance with this guidance, ETA requests changes to the subject ICR to add a new option in the Form 9197 under Section One, Question One, to indicate that the party completing the form is fully vaccinated, as defined by the most up-to-date CDC guidance.

In March of 2022, ETA revised the Form 9197 to replace the “fully vaccinated” option with “up to date” to reflect the CDC’s change in terminology from guidance based on “fully vaccinated” to guidance based on “up to date.” However, in consolidating its COVID-19 policies, Job Corps has determined that tracking “fully vaccinated” status is relevant to certain COVID-19 mitigation strategies and to identify and assist students who are eligible for boosters to bring them up to date.

Job Corps Program Information Notice No. 21-12 was updated to reflect this change and issued on June 15, 2022.

¹ Center for Disease Control, *Stay Up to Date with Your COVID-19 Vaccines* available at <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/stay-up-to-date.html#> (last updated March 30, 2022).