

SUPPORTING STATEMENT
Job Corps Placement Record
OMB Control No. 1205-0035

This Information Collection Request (ICR) seeks OMB approval for the revision of ETA-678 Job Corps Placement Record. The purpose of this form is to track, document, and verify a student's post-center placement after separating from Job Corps.

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 is composed of 6 regional offices and 121 Job Corps centers nationwide.

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 97 centers, 95 are managed and operated by private organizations, including private, for-profit companies. In most cases, these entities are contracted through competitive procurements, with negotiations and selections conducted by the Department in accordance with WIOA, the Competition in Contracting Act, and Federal Acquisition Regulations. Many current contractors operate more than one center. Additionally, there are 26 public colleges and universities operating Job Corps Scholars Program demonstration grants.

A statutory purpose of the Job Corps program is to provide eligible youth with the education and training that lead to "successful careers, in in-demand industry sectors or occupations or the Armed Forces, that will result in economic self-sufficiency and opportunities for advancement; or enrollment in postsecondary education, including an apprenticeship program." 29 U.S.C. § 3191(1)(A). Specifically, WIOA requires that the Secretary "place [Job Corps] enrollees in employment leading to economic self-sufficiency for which the enrollees are trained or assist the enrollees in further activities described in this subtitle." 29 U.S.C. § 3199(b). Job Corps requires that placement information must be recorded and submitted according to procedures established by the Secretary. See 20 C.F.R. § 686.730.

In accordance with 5 C.F.R. Part 1320, the Department is seeking renewed approval for data collection to obtain information from Job Corps students, upon program completion and/or separation, as to their post-program placement (i.e., entry into full-time employment, postsecondary education or other advanced training, a Registered Apprenticeship, or the armed forces). Evaluating Job Corps program completion and post-program placement using the Job Corps Placement Record will enable the Job Corps National Office track, document, and verify information on placements, which is a required activity under WIOA. Student data is maintained in accordance with the Department's Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student Records.

- 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 placement of Job Corps students is the primary responsibility of career transition services (CTS) providers. When the CTS provider places a student, employment data (e.g., employer name, date placed, initial wage, etc.) is electronically entered into the Job Corps Career Transition Services (CTS) database. This data pre-populated the ETA Form 678, which is then used to evaluate whether the program has met its goals related to the statutory requirements under WIOA. At placement, the CTS provider completes the form and provides placement information. After placement, this form may be used to provide information on placement upgrades and continued employment during the CTS service period.

- 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 Career Transition System (CTS) collects information necessary for program management and performance reporting for post enrollment placement. The CTS provider uses a personal computer to enter the data which is transmitted electronically to a centralized database. Performance reports and other management reports are created because of information entered into the database.

- 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.*

This is a basic source document that generates all placement information. No other such information is available at the time this document is prepared for each student separating from Job Corps. The purpose of the collection is to gather information about each student's post-center placement outcomes after separation from the program. Therefore, duplication does not occur.

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.*

This information collection is needed to track Job Corps placement after a student completes and/or is separated from the program. Job Corps is required under WIOA to place students into a quality placement pathway (i.e., entry into full-time employment, postsecondary education or other advanced training, a Registered Apprenticeship, or the armed forces) upon program completion. See 29 U.S.C. 3199(b).

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 (PRA) of 1995, the public was given 60 days to review and comment on this information collection by way of *Federal Register* notice 88 FR 7998 published on 2/7/2023. No comments were received.

It is important to note that DOL maintains regular contact with the Job Corps center operators and CTS providers for discussions regarding this information collection.

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.*

This survey is conducted in accordance with all relevant regulations and requirements, including the Privacy Act of 1974 (5 U.S.C. § 552a), the Department's regulation implementing the Privacy Act (29 C.F.R. Part 71), the Freedom of Information Act (5 U.S.C. § 552), and the Department's regulation implementing the Freedom of Information Act (29 C.F.R. Part 70). In addition, the procedures for managing Job Corps student records can be found in the Department of Labor's Privacy Act System of Records Notice (SORN) DOL/GOVT-2 (Job Corps Student Records) 67 FR 16815. The Secretary issues guidelines for a system for maintaining records for each student during enrollment and for disposition of such records after separation.

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 hourly 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 the 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.”*

Further explanation of the burden hours is explained below:

Respondent Burden:

$$34,000 \text{ (total annual respondents)} \times 7.43 \text{ (minutes)} = 252,620 / 60 \text{ minutes} = 4,210 \text{ (burden hours)}$$

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

Estimated Annualized Respondent Cost and Hour Burden

Activity	Number of Respondents	No. of Responses per	Total Responses	Average Burden Per hour	Total Burden (Hours)	Hourly Wage Rate	Total Burden Cost
ETA Form 678 Job Corps Placement Record	34,000	1	34,000	7.43 minutes	4,210	\$28.00*	\$117,889

Source: Job Corps Career Transition System (CTS) database.

*The rate is based on data obtained from contract rates for CTS providers.

There are no additional costs to respondents. They are Federal contractors. See section 12 and 14 for a breakdown of these costs.

13. *Provide an estimate of the total annual cost burden to respondents or recordkeepers 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 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 to respondents. 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. The CTS provider completes the ETA Form 678 electronically for every student who is placed in a job, the Armed Forces or an additional education or training environment. As noted in #12, an estimated 34,000 students are placed on an annual basis. The CTS specialists require approximately 7.43 minutes to complete the form, at an average hourly rate of \$28.00 per hour. Therefore, $34,000 \text{ (respondents)} \times 7.43 \text{ (minutes)} / 60 \text{ (minutes)} = 4,210 \text{ hours}$. $4,210 \text{ hours} \times \$28 \text{ (per hour)} = \$117,889$.

During FY2021, 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, therefore, the cost allocated to this ICR is estimated to be \$7,225 ($\$51,000,000 \text{ system cost times } 34,000 / 240,000,000 \text{ transactions}$). Therefore, the total Federal cost for this collection is $\$117,889 + \$7,225 = \$125,114$.

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

Revisions to this information collection include: (1) incorporating additional data points, (2) minimizing human error/inconsistencies, and (3) promoting diversity, equity, inclusion, and accessibility (DEIA) principles. These changes enable career transition services staff to accurately capture occupation data related to Job Corps graduates' employment outcomes. The addition of apprenticeship fields allows staff to capture data necessary to verify that placements are Registered Apprenticeships. The addition of unique employer codes allows for consistent employment data without human error to conduct accurate data analysis. Last, the addition of DEIA data including preferred name, gender identity, and pronouns helps promote inclusive interactions between Job Corps staff and graduates.

- 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 ETA Form 678 is aggregated into reports published on Job Corps' public website (<https://www.jobcorps.gov/>) and WIOA-required reports to Congress.

- 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.