

SUPPORTING STATEMENT
Job Corps Student Experience Assessment
OMB Control No. 1205-0543

This Information Collection Request (ICR) seeks OMB approval for a revision to the Job Corps Student Experience Assessment Survey (SEA). The purpose of this assessment is to evaluate Job Corps programming by measuring the satisfaction of currently enrolled students.

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 (Department) 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 of 1982 and the Workforce Investment Act 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 comprised 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 through an interagency agreement. Of the remaining centers, 95 are managed and operated by contractors selected by the Department and an additional two are demonstration projects. 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 State of Idaho runs one center under a cooperative agreement and the National Guard Job Challenge program runs a center under a demonstration grant.

WIOA requires that each Job Corps center “provide enrollees with **an intensive, well organized, and fully supervised program of education**, including English language acquisition programs, career and technical education and training, work experience, work-based learning, recreational activities, physical rehabilitation and development, driver’s education, and counseling, which may include information about financial literacy.” 29 U.S.C. § 3198(a)(1) (emphasis added). Further, these activities must be targeted to helping students, upon completion of the program,

secure and maintain meaningful unsubsidized employment, enroll in and complete secondary education or post-secondary education or training programs, or satisfy Armed Forces requirements. 29 U.S.C. § 3198(a)(2).

In accordance with 5 C.F.R. Part 1320, the Department is seeking renewed approval for data collection to obtain information from Job Corps enrolled students, on a voluntary basis, necessary to evaluating whether Job Corps center program activities are intensive, well organized, and fully supervised as required under WIOA. Evaluating Job Corps program activities using the SEA will help ensure that operators are providing contracted services and that the program is meeting the needs of its enrolled students.

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.*

WIOA Sec. 159 (b)(2) and (f)(1) (29 U.S.C. § 3209(b)(2) and 29 U.S.C. § 3209(f)(1)), and 20 C.F.R. § 686.1000 require that the program must evaluate Job Corps centers at least every three years and assess centers' performance annually. A key aim of the evaluation is to ensure operators provide the contracted services to enrolled students and that student needs are being met. The SEA is a necessary data collection instrument because it is the only method of regularly and directly collecting data from students about their experiences in the program while enrolled. It is imperative to collect data directly from the students. Every center has a Regional Office Center Assessment (ROCA) at least twice during their five-year contract period. The ROCA uses the results from the SEA. In fact, it is one of Job Corps' emerging and most important management tools to directly collect the data from active students about their experiences at their respective centers and with the program activities provided at the center.

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.*

The SEA is conducted via a Web-based survey platform that can be completed on any Internet-enabled device. Additionally, the SEA is computer-adaptive to further minimize the burden. Students only complete the sections of the survey relevant to their current level of progress in the program. This format reduces the burden for SEA respondents, allows for more accurate data collection procedures, and improves the ability to provide results quickly.

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.*

Prior to the SEA, Job Corps obtained student feedback via the Student Satisfaction Survey, which collected information about student experiences with different aspects of the program. The SEA questions are more in-depth and ask about the quality of the services provided to the students. The SEA is the only method of regularly and directly collecting data from students about their experiences in the program while enrolled. The SEA allows Job Corps students an opportunity to express any concerns or issues about their experiences and level of satisfaction with those experiences. The SEA also provides more information for the Office of Job Corps and center operators to improve oversight and day-to-day administration of the Job Corps program.

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 consequences 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.*

The SEA is the only method of obtaining direct information about student experiences and satisfaction with the program. In addition, because of the fiscal incentives associated with operating a Job Corps center, the operators are often reluctant to share any information that may be considered unappealing or reflect negatively on their center operating structure. Reducing the administration frequency of the survey reduces the information available to the Office of Job Corps, which limits their ability to ensure that all students are receiving contracted services required under WIOA and that student needs are met.

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.*

This data collection effort does not involve any special circumstances. The SEA is voluntary, conducted quarterly.

8. *If applicable, provide a copy of 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 (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 February 9, 2023 (88 FR 8479). No public comments were received.

DOL maintains regular contact with the Job Corps centers and the center operators and provides immediate assistance for problems through the Office of Job Corps, which is responsible for defining the business rules and requirements for Job Corps systems.

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

There are no 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.

All Job Corps student Personal Identifiable Information (PII) related to this survey including sample information and survey results are under a secure network environment. The student information used to generate the sample is collected, stored, and maintained by the Job Corps Data Center (JCDC). The application is accessible via Citrix, JCDC's secure method of data storage. All survey results are stored in a two-layer authentication private-cloud run by Rackspace Government Solutions which meets the level of a Provisional Authorization to Operate (P-ATO). The data is transferred between the two secure locations through an encrypted portal.

JCDC takes several steps to ensure the safety and integrity of the student data housed at its facilities in Austin, Texas. All student data are housed on a central server, in a secured computer room in a locked building on a fenced and guarded facility. There are several layers of system security. The server network is a private network. The network is also protected from the Internet by a series of layered firewalls, access control lists, and intrusion detection systems.

All Job Corps employees and contractors enter data into the system through the private network. All users must have a valid user ID and password (which is changed every 90 days) to enter the system. Two-factor authentication, application-level user IDs and passwords, and specific permission applied at the database level all provide additional security. The integrity of the data is insured by running daily validation programs that submit the data to a set of pre-approved business rules established by the Office of Job Corps. To secure the integrity of the data during transmission to the data collection contractors, JCDC has established 256-bit encrypted Citrix sessions from the data collection center operators to the JCDC. All the survey contractor's staff have completed security awareness training and have access to the Citrix environment and the CDSS suite of applications.

Additionally, the contractor survey sites are maintained in accordance with the Guide for Security and Privacy Controls for Federal Information Systems and Organizations (SP 800-53 Revision 4), at the moderate level, posted by The National Institute of Standards and Technology's Computer Security Resource Center. Internal access to individual records within the database at the JCDC follows the principles of least privilege required and are controlled by all appropriate security measures, including controlled usernames, passwords, profile name, host name, firewall security IDs, and crypto cards. Input of data occurs only via a secure Citrix tunnel maintained by JCDC, ensuring a secure means of communication for the data collection contractors and hosting facility.

Additionally, onsite the personal computers (PCs) are accessible only after providing individual user passwords that must be changed on a regular basis. Screensavers are installed on all PCs, set to activate after ten minutes, and can only be released through the individual user's password. PC

passwords are not physically documented; therefore, loss of access may be recouped only by the reassignment of a password by the information systems staff.

All Job Corps survey respondents are informed that completing the survey is voluntary. Only aggregated results will be shared. Their individual responses are private. The results will be used to determine student satisfaction of the center; it is not an evaluation of student performance. The survey provides students with a hotline number if they need to report an immediate safety concern.

To keep the data private, it is important not to release data into public use files or to present results in reports so that individuals can be identified. Data collected through the survey instruments are not made publicly available. Job Corps staff or contractors analyze data for purposes of program management and quality improvement. Nonetheless, reports that use these data will be handled in a manner that eliminates the possibility of compromising privacy. Job Corps staff and contractors will follow commonly accepted guidelines (what the Federal Committee on Statistical Methodology calls the Threshold Rule) and display only aggregated data when there are more than three cases in a cell table. When there are three or fewer cases in a cell table, tabular data will be presented by combining categories or suppressing cells to ensure the elimination of possible individual identities. Given the size of Job Corps centers and the aggregation of data, the data presented in any cell table will most likely represent information from many more observations. A center report is not provided to the center if fewer than ten students complete the survey.

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 SEA does not ask students to report their own behaviors, including sexual behaviors and attitudes, religious beliefs, or substance use or abuse. The survey does include questions about student experiences and satisfaction with the components of the Job Corps program. The SEA is voluntary. At any time, Job Corps students can choose not to complete the survey if they object to the questions.

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.”*

This data collection is a quarterly process that supports the administration of approximately all Job Corps students. Students can select whether they want to complete the survey in English or in Spanish using a drop-down menu on the screen. Based on results from the most recent survey administration, the expected number of respondents and burden hours are provided separately based on which language students used to complete the survey. The current number of students is 37,417 contracted on-board strength (OBS). The average amount of time to complete the survey is about 20 minutes. The combined annual respondent burden with this data collection effort is estimated at approximately 39,513 hours based on an 80% response rate, as shown in Table 1.

Activity	Expected Number of Respondents (based on 80% response rate)	Frequency	Total Annual Responses (based on response rate)	Time Per Response (hours)	Total Burden (Hours)	Hourly Wage Rate**	Monetized Value of Time
Completing SEA in English	28,826	4	115,304	.33	38,050	\$0	\$0
Completing SEA in Spanish	1,108	4	4,432	.33	1,463	\$0	\$0
Unduplicated Total	29,934	4	119,736	.33	39,513	\$0	\$0

Table 1: Estimate of Respondent Burden

* Respondents can take the survey more than once during their enrollment based on sampling.

** The survey does not affect the hourly rate since the respondent is an OJC student.

If all Job Corps centers were at their contracted On Board Strength and all students responded, the burden would be 37,417 students for 12,472.33 hours quarterly. However, with 80 percent response rate of the maximum size, there would be 29,934 respondents with a burden of 7,483 hours quarterly.

There will be no cost to respondents. The survey will occur during their active enrollment in Job Corps and their Job Corps pay will not be interrupted. Therefore, there will be no loss of income.

13. *Provide an estimate for the total annual cost burden cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected on the burden worksheet.)*

There are no additional costs to the respondents for participating in this survey.

14. Provide estimates of annualized costs 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 may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The annual cost of the quarterly administration of the SEA to all Job Corps centers is estimated to be \$274,000. This includes the costs of time and materials for Federal employees to prepare the sample; administer the survey; process and analyze the data; provide quarterly reports; maintain a dashboard that allows for easy monitoring of the SEA results nationally, regionally, and by center; and ensure that response rates are at acceptable levels through trainings and materials.

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

No changes to the burden worksheet were made. There were changes made to the survey script. Updates were made to the response categories of specific questions to include more options for students. The additional response categories allow Job Corps to collect more accurate information from students about their experiences or improve the skip-logic of the survey programming. In addition, questions were added or refined within the script to collect more accurate information from students and ensure the survey meets the needs of all students including adding a question to adjust the skip-logic of the survey programming for students in distance learning due to the COVID-19 pandemic. The prior burden statement estimated that students would require .33 of an hour to complete the survey; however, data from survey showed that this was not required. For example, in the last administration, students who completed the survey did so in, on average, .26 of an hour. Therefore, the estimated burden of the additional 16 questions, including one that intended to reduce the burden by skipping questions unrelated to the student, is not estimated to increase the burden. None of the changes to the survey script require adjustments to the estimated time to complete the survey or the burden worksheet.

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.

The data collected will not be published publicly.

17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The instrument is administered online and includes the OMB expiration dates.

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18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions”.

There are no exceptions.