

SUPPORTING STATEMENT
Job Corps Health Questionnaire
OMB Control No. 1205-0033

This Information Collection Request (ICR) seeks OMB approval for a revision of the currently approved ICR that expires on 6/30/2023.

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. The remaining 2 centers are operated under demonstration grants awarded to the State of Idaho Department of Labor (IDOL) and the National Guard Job Challenge program. Additionally, there are 26 public colleges and universities operating Job Corps Scholars Program demonstration grants.

WIOA authorizes the collection of information from Job Corps applicants to determine eligibility for the Job Corps program, 29 U.S.C. §§ 3194-3195.

Applicant and student data is maintained in accordance with the Department of Labor's (Department) Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student Records, 81 FR 25765.

In accordance with 5 CFR 1320, DOL is seeking approval for data collection to obtain necessary information from each applicant to the Job Corps program. These forms collect initial data to determine eligibility collect socio-demographic characteristics and employment barrier information that are required for reporting under the Workforce Innovation Opportunity Act (WIOA), and used for program planning, evaluation, and reporting purposes. This activity is the major responsibility of Job Corps admission representatives. The ETA 653 – Health Questionnaire is the form in this collection.

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 information on the Form ETA-653 is collected by the admissions services to enable the centers to determine the health needs of the applicant and whether the applicant may need to be evaluated further as a possible direct threat to others. After they have determined eligibility and the applicant has been selected for assignment into the Job Corps program, the admissions counselor completes the form and sends it with the admission packet to the Job Corps center for review. After review at the center, the health staff may feel additional health information is needed and either obtain the information directly from the applicant or contact the admissions counselor to obtain the information from the applicant's health care provider.

If the center can meet the health care needs of the applicant and the applicant is not determined to be a direct threat to others, the applicant is enrolled. If the center health staff recommends denial of the applicant based on the inability of the center to meet the applicant's health care needs or if the applicant poses a direct threat to others, the center's respective Regional Office is notified that the applicant's file needs review. During the Regional Office review, the applicant file is administratively reviewed by the Disability Support Contractor and the center's assessment is reviewed by the Health Support Contractor. The application, along with the recommendation of the Health Support Contractor, is submitted (or returned) to the Regional Director for final determination. If the Regional Director concurs with the Health Support Contractor's recommendation of denial of enrollment, then the denial of enrollment is upheld. If the Regional Director overturns the decision of the center, then the applicant is enrolled soon.

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.*

In early spring 2024, Job Corps plans to implement an electronic system of application data collection in the health areas. This health information is currently collected in OASIS. Admissions services enter information provided during their interview with the applicant to an electronic version of the Form ETA-653. These responses are transmitted to the applicant's

center of assignment for use by the center's health staff, in keeping with the Privacy Act and the Health Insurance Portability and Accountability (HIPAA) Law's Privacy Rule.

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 questionnaire is the only form administered to the applicant to help the centers determine the health needs of the applicant, and only one questionnaire is completed for each applicant.

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 questionnaire is only administered once to each applicant who has been given a conditional assignment. If the questionnaire was not completed, then the centers would not be able to determine the health needs of the applicant and could potentially have students with severe mental health or health-related conditions enter the program that could pose a direct threat to other students or staff. Also, if the applicant arrives on center with a serious health or mental health condition that cannot be accommodated, the center will have to immediately medically separate these students from the Job Corps program.

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 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 8477). No public comments were received.

DOL maintains regular contact with the representatives of the program who must compile the records associated with this collection. These entities, Outreach and Admissions contractors, Job Corps centers and the Center Operators, provide immediate assistance for problems arising from implementation of policy changes and issues effecting the rules and requirements for Job Corps data 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.*

The nature of the program requires that sensitive areas be addressed to gather information about each applicant's eligibility to receive Job Corps benefits. The Job Corps Privacy Act Statement

is given to each applicant. It describes how the information will be used, who has access to it, and how it can be released. All of these, however, are part of the admissions equation, as required by law. Applicants are advised that the information collected is confidential and it is covered under the Privacy Act and the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy Rule. Applicants also are required, as a condition of participating in Job Corps, to sign an 'Authorization for Use and Disclosure of Your Health Information' in accordance with the HIPAA. Keeping student social security numbers and student records, including student medical and disability-related records private is covered in the Job Corps Policy and Requirements Handbook. The law authorizing this program provides for compliance with the Privacy Act in all its aspects 20 CFR 670.965, Disclosure of Information, provides instructions as to how to keep private the information that is obtained on each applicant and student.

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.

This form collects demographic information, including a student's sex and gender identity. Job Corps is required by Federal law to collect students' sex. Job Corps must collect information on student's gender identity to allow us to provide gender-responsive healthcare services and to ensure students' rights are protected.

The medical and behavioral health questions on Form ETA-653 are considered questions of a sensitive nature. It is necessary to ask these questions for the safety and health of the applicant and other students at the center. The behavioral health questions identify applicants that could pose a direct threat (one that cannot be eliminated or reduced by reasonable accommodation or modification) on the Job Corps center that would affect the safety and health of others. The medical questions identify applicants with health conditions who may need care management plans on center or who may have health care needs beyond the basic health services provided by Job Corps.

There is also a cost factor to not obtaining this information. Without this information, students who pose a direct threat to others or who have healthcare needs that cannot be met by Job Corps would require medical separation soon after arrival. It would be costly to the centers to pay for transportation for students to return home.

The information on the Form ETA-653 is maintained confidentially and reviewed by those with a need to know including the Job Corps center health and wellness staff, the Disability Support Contractor, and the Health Support Contractor. The Form ETA-653 provides information about privacy and information sharing. At the same time, applicants sign Form 6-02 Authorization for Use and Disclosure of your Health Information which provides consent for use of health information.

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.”

See the chart below for the listing of forms, by number, number respondents, hours per submission, and total annual burden hours. Further explanation of the burden hours is explained below:

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
ETA 653 Job Corps Health Questionnaire	66,630	1	66,630	15 minutes	16,658	\$15.00	\$249,870
Unduplicated Totals	66,630		66,630		16,658		\$249,870

Data Source: Job Corps Database of Program Applicants.

To calculate the time burden for the revised Health Questionnaire (ETA 653), Job Corps requested and received feedback from nine outreach and admissions managers regarding estimated time needed for completion. Based on their extensive experience working with applicants to complete the ETA 653 their responses consistently estimated an average of 15 minutes.-

As the chart above indicates, the total public burden for the Form ETA-653 is 16,658 burden hours. Based on the current minimum hourly wage of \$15.00, the value of respondent time is calculated at 16,658 hours x \$15.00 for a total of \$249,870. The federal minimum wage provisions are contained in the Fair Labor Standards Act (FLSA)

<https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/FairLaborStandAct.pdf>

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 other costs.

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 g.

The form is maintained electronically, therefore there are no printing costs. The admissions services who complete the Form ETA-653 are Federal contractors. As stated in question 12, it takes approximately 15 minutes for them to enter information on the Form ETA-653. The Health and Wellness Directors on the Job Corps centers review the forms of all student applicants. This review takes approximately 5 minutes. Based on a review of previous years, an estimated 650 forms require an additional review at the regional level by the Regional Disability Coordinators, and 600 forms by the Regional Health Specialists (i.e., Regional Physicians, Regional Dentists, Regional Mental Health Specialists, and Regional TEAP Specialists). Based on current budget estimates for these support contracts the hourly labor rate for admissions services is determined to be \$30, while the hourly rate for Health and Wellness Director is \$38, the hourly rate for Regional Disability Coordinators is \$40, and the hourly rate for Regional Health Specialists is \$75. Total Federal labor expense is \$472,305 (see table below). During FY2019, ETA has budgeted \$51,000,000 to operate and maintain the Student Pay Allotment and Management Information System (SPAMIS). SPAMIS processes Job Corps student payroll, allotment, transitional allowances, leave, earnings, attendance records, placement, and provides a series of reports to each Job Corps Center allowing them to measure performance of the center and its contractors. 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 \$14,159 (\$51,000,000 system cost times 66,630/240,000,000 transactions). Total direct and indirect Federal costs for this collection is \$472,305 + \$14,159 = \$486,464.

Federal Cost of this collection:

Activity	Number of Respondents	Frequency	Total Annual Responses	Time Per Response (minutes)	Total Annual Burden (Hours)	Hourly Rate*	Monetized Value of Respondent Time
Federal Labor Expense							
OA Data Entry	66,630	1/person	66,630	8	8,884	\$30.00	\$266,520
Health and Wellness Director Review	66,630	1/person	66,630	5	5,553	\$38.00	\$211,014
Regional Disability Coordinator Review	650	1/person	650	15	163	\$40.00	\$6,500
Regional Health Specialist Review	600	1/person	600	15	150	\$75.00	\$11,250

Total Federal Labor Cost							\$472,305
Equipment Maintenance							
System Maintenance Prorated Cost		240,000,000	66,630				\$14,159
Total Federal Cost					14,750		\$486,464

Source: Job Corps contract labor

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

While Form ETA-653 has been changed to clarify several questions, the changes did not affect the burden worksheet.

Revisions to the collection of information include: (1) incorporating plain language, (2) promoting diversity, equity, inclusion, and accessibility (DEIA) principles, and (3) updating health information to be in line with modern medical, dental, optical, and mental health needs. These changes are the result of the Office of Job Corps (OJC) programmatically implementing a student-centric approach to its admissions process that will allow OJC to convert the paper-based Health Questionnaire (ETA 653) to a web-based form. Incorporating plain language changes, including disclaimer language and instructions on how to complete the ETA 653 will promote the voluntary self-disclosure of medical information so that OJC can meet the healthcare needs of its students. The addition of DEIA data helps to facilitate trust and engagement between applicants and Health and Wellness staff. Finally, updating health information collected throughout the ETA 653 ensures that Job Corps stays current within the medical care services industry.

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 purpose of the Form ETA-653 is to assess the health needs of the applicant who has been given a conditional assignment. No further tabulations or statistical analyses are made of the information provided on the Form ETA-653.

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 Form-ETA 653 will display the OMB control number and expiration date as required by the Paperwork Reduction Act of 1995.

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.