

**SUPPORTING STATEMENT**  
**Job Corps Application Data**  
**OMB Control No. 1205-0025**

This Information Collection Request (ICR) seeks OMB approval for a revision of the currently approved ICR that expires on 4/30/2023.

**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 are maintained in accordance with the Department of Labor's (Department) Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student Records.

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 and to collect socio-demographic characteristics and employment barrier information that are required for reporting under WIOA, and are used for program planning, evaluation, and reporting purposes. This activity is the major responsibility of Job Corps admission representatives. The ETA 652 - Job Corps Applicant Data Sheet is the form in this collection.

The ETA 682 is being eliminated and replaced with a verbal question during admission.

- 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 ETA 652, Job Corps Applicant Data Sheet, is critical to the screening process. This form is completed by the admissions representative in collaboration with each applicant to determine the applicant's eligibility for the Job Corps program in accordance with WIOA and Job Corps policy and to collect socio-demographic and employment barriers information for program planning, evaluation, and data reporting purposes. Data generated from the form is collected electronically by the Job Corps Admissions Representative via interview, generally at the admissions representative's work site.

In addition to an applicant's basic contact information, the ETA 652 collects date of birth, place of birth, race/ethnicity, sex, gender identity, legal residency type, criminal history, income eligibility, employment history, military experience, social services received, education, and family/childcare of each applicant. The revised ETA 652 requires the collection of information from the ETA 655, including a "Statement from Court or Other Agency". Job Corps can also obtain a National Crime Information Center (NCIC) report. Participant Individual Reporting data, captured through the ETA 652, is also included in a PIRL data file, as required by DOL. Information gathered through these forms is used to determine an applicant's eligibility for the Job Corps program, or to fulfill WIOA data collection and maintenance requirements. Any personally identifiable information gathered through these forms is used for eligibility and reporting program outcomes.

Job Corps has updated its Policy Requirements Handbook (PRH) to initiate a criminal background check earlier in the admissions process to determine an applicant's eligibility based on criterion 4 (Criminal History). Job Corps has also updated its background checks process in partnership with the Defense Counterintelligence and Security Agency (DCSA) to verify an applicant's social security number (SSN), making the process more comprehensive and accurate. The business need for collecting SSN requires Office of Management and Budget (OMB) approval through the Paperwork Reduction Act (PRA) clearance process. Currently, Job Corps uses the OMB-approved Authorization for Release of Criminal History Record Information (ETA Form 655) to initiate background checks. However, this form collects many of the same data elements that are included in the Job Corps Applicant Data Sheet (ETA Form 652) Based on the business need for initiating the background check sooner in the process, the revisions required to ETA Form 652 in preparation for the MyJobCorps application, and the redundancy in data collected on both forms, Job Corps determined that the ETA 655 should be consolidated

with the ETA Form 652. Job Corps is able to streamline its business process and reduce the number of paper forms within its portfolio.

The ETA 682 is being eliminated and replaced with verbal questions during admission. All applicants are asked if they have dependents. If the response is “yes,” then they’re asked if they have childcare. Applicants are no longer required to report the name and address of their childcare facility.

- 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.*

All information on the Job Corps Applicant Data Sheet (ETA Form 652) will be collected digitally through MyJobCorps which is comprised of a public-facing frontend called the MyJobCorps Portal and a case management system called the MyJobCorps Gateway. Applicants will use the MyJobCorps Portal to express their interest, create an account, fill out the application, upload required documentation, and provide signatures digitally. The information and signatures provided by applicants will be immediately available in the MyJobCorps Gateway so that Job Corps Outreach and Admissions (OA) staff can digitally collect the remainder of the information needed to complete and generate the Job Corps Applicant Data Sheet. The MyJobCorps Gateway will serve as the case management tool for OA staff to support applicants and process applications for potential admittance into Job Corps. It will facilitate staff tasks via automated workflows, streamline admissions and eligibility processing, and provide Federal and Corporate Managers with real-time insights and measures as well as comparative data over time.

The decision for collecting this information electronically is predicated on meeting the demands of today’s digital first generation. MyJobCorps not only provides interested youth with a digital, mobile-friendly web application, but also elevates the application process to a level that meets the expectations of today’s youth.

The application provides prospects with a web-based (mobile friendly) student-focused portal so that they can manage their application, track status, and stay in constant communication with JC; creates an efficient, standard, trackable automated process for Admissions Representatives to manage, support, and communicate with applicants; collects and maximizes access to data so it can be utilized as a strategic asset to establish baseline metrics in the admissions process and enable admissions staff and program managers to generate essential reports; and reduces the cycle times of the end-to-end enrollment process to secure applicant placement within a center, while digitally engaging with them using an online portal throughout the Enrollment process to sustain their interest with Job Corps.

- 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.*

Due to the nature of the activity, duplication is minimal. Only one application is completed for each person who applies to Job Corps. The forms have no cycle and are used only as the individual situation dictates. The information collected on ETA 652 is entered and automatically transferred to other forms, as appropriate.

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

There is no impact on small businesses

6. *Describe the consequences of 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 the burden.*

No other information is available to Job Corps admissions staff at the time these documents are prepared. The information must be obtained to determine each applicant's eligibility to receive the benefits of Job Corps.

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 May 25, 2022 (87 FR 31912). No public comments were received.

DOL maintains regular contact with the Outreach and Admissions contractors, 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.

Admissions Representatives engage with applicants throughout the entire admissions process to help facilitate the completion of the digital application and collect the data required to determine eligibility for Job Corps. Some of the data, such as collected in the 652 is added to the student file so that center staff can enhance the student experience (e.g., preferred name, gender identify, pronouns, alternative contacts, etc.).

9. *Explain any decision to provide any payment or gift to respondents, other than remunerations to contractors 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.*

Applicants are required to meet eligibility requirements to receive Job Corps benefits. The Privacy Act applies to this collection of information. 5 U.S.C. 552a. The Job Corps Privacy Act Statement is given to each applicant. It describes the statutory authority for the collection of information, the voluntary nature of the disclosure, and how application information will be used. Some potentially sensitive items are included during the application process, such as social

security number, income, citizenship status, date of birth, and any criminal history. All such information is required by law to determine eligibility for Job Corps. Additionally, keeping information private, which also includes social security numbers, prior educational records, and prior medical records, is covered in the Job Corps Policy and Requirements Handbook. The law authorizing Job Corps 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 the information, which is obtained on each student private.

*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.*

Job Corps does not keep gender identity data confidential. Instead, Job Corps uses this information to provide services and interact with the students in a way that best meets their needs. Job Corps ensure that Outreach and Admissions staff, as well as center staff are aware of gender identity so that they can engage with each student in an appropriate and inclusive way. Some examples include using this data to inform dorm placement, to segment student experience by gender via the Student Experience Assessment, and to segment student safety via the Student Safety Assessment

*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."*

See the chart below for the listing of forms, by number, number of 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 652 Job Corps Application	66,697	1/person	66,697	10 minutes	11,116	\$15.00	\$166,740
Verbal Verification of Dependents	66,697	1/person	66,697	15 seconds	278	\$15.00	\$4,170
Verbal Verification of Childcare	6,554	1/person	6,554	15 seconds	27	\$15.00	\$ 825
<b>Unduplicated Totals</b>	<b>139,948</b>		<b>139,948</b>		<b>11,421</b>		<b>\$171,315</b>

During PY 2021, 66,697 applicants completed applications for Job Corps. The total burden, as the chart above indicates for the revised form is 11,116 hours. Based on the current minimum hourly wage of \$15.00, the total estimated cost to applicants is \$167,565. 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 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. The \$90,944 reported in the previous submission was a reporting error as that was actually the monetized value of the time burden.

*14. Provide estimates of annualized costs to the Federal government. Also, describe 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 for contractor staff and related costs is estimated to be approximately \$543,000. There are no added federal costs.

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

Revisions of the collection of information includes collecting the social security number on the redesigned ETA 652. The collection of the SSN allows OJC to conduct an applicants' background check as a part of the program eligibility process. Currently, the Admission Counselor (AC) uses an online or electronic system to conduct the background check. Hard copy results are then attached to the ETA 655. Most of the data points from the ETA 655 have been merged into the redesigned ETA 652. Therefore, there is no need for the ETA 655. In the previous submission, it was estimated that it would take respondents 1 minute to complete the Form 655. ETA estimates that the time it takes to complete the information previously on the Form 655 is absorbed into the 10 minutes it takes to complete the Form 652. This leads to a corresponding burden reduction of 1,111 hours.

The ETA 682 is being eliminated and replaced with a verbal question during admission whether a participant has childcare (as applicable). OJC has recently made a change to its policy and no longer requires applicants to provide childcare provider information. All applicants are asked if they have dependents. If the response is "yes," then they're asked if they have childcare. Applicants are no longer required to report the name and address of their childcare facility. As a result, there has been a decrease in burden per respondent to 15 seconds for all respondents, and 15 seconds for affected respondents. This has led to a decrease in overall burden by 23 hours.

The number of estimated applicants is based on PY 2021 data, which is relatively unchanged from the currently approved collection at 66,630 vs 66,697. In total there is a net burden decrease of 1,123 hours.

The changes to the ETA 652 include:

- Addition of the applicant's social security number, which is required to conduct a background check using the National Crime Information Center (NCIC) to determine eligibility as outlined in WIOA. This is a new process for conducting background checks for Job Corps applicants.

The \$90,944 reported in the previous submission as a cost was a reporting error as that was actually the monetized value of the time burden.

*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 schedule for the entire project, including beginning and ending dates of the collection of information, completion of the report, publication dates, and other actions.*

Much of the data from these collections (Forms 652) is aggregated into reports, which are always available and published on Job Corps' public website at: <https://www.jobcorps.gov/job-corps-reports>, and for WIOA-required reports to congress.

*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 expiration date is 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. Collections of Information Employing Statistical Methods**

This information collection does not employ statistical methods.