

**SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT 1995 SUBMISSIONS
OMB No. 1205-0033
Job Corps Health Questionnaire**

A. JUSTIFICATION

1. *Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.*

Response: Job Corps is the nation's largest residential, educational, and career technical training program for young Americans. Job Corps was established in 1964 by the Economic Opportunity Act and currently is authorized by Title I-C of the Workforce Investment Act of 1998 (pertinent regulations are at 20 CFR 670.525(d)). For nearly 50 years, Job Corps has helped prepare nearly 3 million at-risk young people between the ages of 16 and 24 for success in our nation's workforce. With 125 centers in 48 states, Puerto Rico, and the District of Columbia, Job Corps assists students across the nation in attaining academic credentials, including a High School Diploma (HSD) and/or High School Equivalency credential, and career technical training, including industry-recognized credentials, state licensures, and pre-apprenticeship credentials.

Job Corps is a national program administered by the U.S. Department of Labor (DOL) through the National Office of Job Corps and six Regional Offices. DOL awards and administers contracts for the recruiting and screening of new students, center operations, and the placement and transitional support of graduates and former enrollees. Large and small corporations and nonprofit organizations manage and operate 97 Job Corps centers under contractual agreements with DOL. These contract center operators are selected through a competitive procurement process that evaluates potential operators' technical expertise, proposed costs, past performance, and other factors, in accordance with the Competition in Contracting Act and the Federal Acquisition Regulations. The remaining 28

Job Corps centers, called Civilian Conservation Centers, are operated by the U.S. Department of Agriculture Forest Service, via an interagency agreement. The DOL has a direct role in the operation of Job Corps, and does not serve as a pass-through agency for this program.

This admission process is carried out by admission counselors. This admission process ensures that applicants meet all eligibility requirements and additional selection factors as defined in Chapter One of the Policy and Requirements Handbook (PRH) October 2009.

Nonmedical personnel in the admissions office (admission counselors) conduct the screening interview and complete all required application forms.

2. *Indicate how, by whom, and for what purpose the information is to be used.*

Response: The information on the ETA 653 is entered by the applicant and then collected by the admissions counselors to enable the centers to determine the health needs of the applicant. The admissions counselors, after they have determined eligibility and the applicant has been selected for assignment into the Job Corps program, send information from the ETA 653 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, whereupon the admissions counselor would be contacted to obtain the information that has been requested from the applicant's health care provider.

If the center health staff approves the admission to the center, the applicant is enrolled at the earliest possible date. If the center health staff rejects the application, it is then sent forward to the center's Regional Office for review. If the Regional Health Consultants in the Regional Office concur with center staff, the application, along with the recommendation of the consultants, is forwarded to the Regional Director for final determination. If the Regional Director concurs with the recommendation, then the admission is rejected and admission to the program is denied. If the Regional Health Consultants or the Regional Director overturns the decision of the center, then the applicant is enrolled at the earliest possible date.

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 response, and the basis for the decision for adopting this means of collection.*

Response: In order to comply with the Government Paperwork Elimination Act, Job Corps has reduced the paperwork burden by implementing an electronic system of application data collection. Admissions counselors enter information provided by the applicant on the ETA 653 to an online system. This information is then 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.*

Response: This questionnaire is specifically for the Job Corps program to determine the health needs of the applicants who have been given a conditional assignment. 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 business or other small entities describe any methods used to minimize burden.*

Response: This information would not impact small business.

6. *Describe the consequences 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.*

Response: 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 themselves or other students. Also, if the applicant arrives on center with a serious health or mental health condition, the center would 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:*
- *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 the 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 support by disclosures 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 secret, 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.*

Response: There are no special circumstances.

8. *If applicable, provide a copy and identify the data and page number of the 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.*

Response: In accordance with the Paperwork Reduction Act of 1995, the public was given 60 days to review and comment on the Federal Register notice concerning this information collection, which was published July 17, 2013 (Vol. 78, p. 42803). One comment was received, from Wendy Boyd, Senior Training Director of the Management Training Corporation, a contractor which operates numerous Job Corps Centers. She made the following suggestions:

- “Page 1 #7: Combine a & b into one question: Are you or your family covered by health insurance or Medicaid?
- Page 2 #8: Combine j & k into one question: Received counseling or treatment for any reason (mental health issue, drug or alcohol use)?
- Page 2 #8: Combine l - q into two question such as: 1. Attempted, thought about, or harmed yourself or others? 2. Heard or seen things that others did not see or hear or believed your thoughts were being controlled by someone or something?
- Page 2 #8: r-u: Aren't criminal behavior questions asked other places as part of eligibility? Is this repetitive? If so, could this question could be deleted?
- Page 3, third bullet from the bottom: "I (we) understand the reasons for the medical and oral examinations and health testing and have had the opportunity to ask questions." Should this actually be on the paperwork signed with the admissions counselor? Can the admissions counselors realistically be expected to be able to accurately answer any health related questions applicants may have? Recommend deleting this bullet.”

Job Corps appreciates these suggestions as ways of increasing the usefulness of the information provided in response to this questionnaire; however, Job Corps asks these questions in this manner to ascertain accurate information from the applicant. Oftentimes, phrasing a question in a different manner solicits a different response. Therefore, the suggestions were not incorporated.

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

Response: There are no payments or gifts given to respondents.

10. *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.*

Response: Applicants are advised that the information collected is confidential and it is covered under the Privacy Act and the HIPAA Privacy Rule. Applicants are also given a copy of the Job Corps Privacy Act Statement, which explains the uses that will be made of the information that the applicants supply to Job Corps. Applicants also must sign an 'Authorization for Use and Disclosure of Your Health Information as required by the Health Insurance Portability and Accountability Act of 1996' form.

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*

Response: Questions 8 and 9 would be considered questions of a sensitive nature. It is necessary to ask these questions for the safety and health of the applicant and other students on center. The applicant 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 the applicant or others. If the questions were not asked, applicants could be enrolled who may potentially harm themselves or others. There is also a cost factor; it would be necessary to medically separate those students who were considered to be a direct threat and those applicants who were enrolled that have serious mental health or health issue. It would be costly to the centers to pay for transportation for students to return home. The information on the ETA 653 is reviewed by the Job Corps Health staff and the Job Corps Health Consultants. Applicants sign an *Authorization for use and disclosure of your Health Information as Required by the Health Insurance Portability and Accountability Act of 1996*.

12. *Provide estimates of the hour burden of the collection of information. The statement should:*

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 in Item 13 of OMB Form 83-I.

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 in Item 14.

Response: The time on average for an individual to respond to the ETA 653 questionnaire continues to be five minutes. Therefore the 87,581 respondents (slightly less than the figure from three years ago) x 5 minutes divided by 60 = 7,298 hours. ETA has assigned a dollar value of \$7.25 per hour (minimum wage) for students' opportunity costs. The current minimum wage of \$7.25 times the applicant's time of five minutes per questionnaire equals $87,581 \times 5 \text{ minutes} / 60 \times \7.25 , or \$52,914.

13. *Provide an estimate of 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 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 services 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.*

Response: There are no additional costs other than those mentioned in item 12 above.

- 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. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.*

Response: The form is maintained electronically; therefore, there would be no printing cost. The Health and Wellness Managers on the Job Corps centers review the forms of all students, approximately 70,000, assigned to the Job Corps program. It takes approximately 5 minutes to review it, and the Health and Wellness Managers average about \$30.00 per hour. 70,000 x

5 (minutes) / 60 x \$30 = \$175,000. Approximately 2,000 forms would require an additional review at the Regional level by the Regional Nurse Consultants, and 200 forms by the Regional Physicians, Regional Dentists, or Regional Mental Health Consultants. 2,000 x 15 (minutes) / 60 x \$32 = \$16,000. 200 x 15 (minutes) / 60 x \$50= \$2,500. Total cost: \$193,500. During FY2013, ETA has budgeted \$40,473,000 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 \$5,733 (\$40,473,000 system cost times 34,000/240,000,000 transactions). Therefore \$193,500 + \$5,733 = \$198,733.

15. *Explain the reasons for any program changes or adjustments reporting in Items 12 or 13.*

Response: The burden is reduced because the number of students for this is slightly reduced from the last submission, which was reported at 92,591. Although there are no program changes or adjustments resulting in burden changes, the Health Questionnaire (ETA 653) includes minor adjustments and added phrases in a few instances.

More specifically, the criminal history components were deleted under questions #8, "t" and "v.", and they were consolidated into the following single question:

"been removed from your home, school, or job due to behavior"

The Office of Job Corps made a few other minor changes to increase clarity and updated Question 9 in Form ETA 653-to include the medical conditions of cancer/malignancy, sleep apnea, organ transplant, and muscle or bone disorder. These conditions were added because they are significant medical conditions that need to be disclosed to assist health staff in providing appropriate case management

A track changes version of Form ETA-653 has been included in this ICR and appears as submission as a "supplementary document" on the information collections screen.

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.

Response: The purpose of the Health Questionnaire 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 Health Questionnaire.

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.*

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

18. *Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submission."*

Response: There are no exceptions.

B. Collection of Information that Employ Statistical Methods

Response: This collection does not employ statistical methods