SUPPORTING STATEMENT FOR
PAPERWORK REDUCTION ACT SUBMISSION
OMB No. 1205-0030
Job Corps Enrollee Allotment Determination
Information Collection Request

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.

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. 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.

The ETA 658, Job Corps Enrollee Allotment Determination, information collection provides a vehicle to make allotments available to students who both desire an allotment and have a qualifying dependent. The form in this collection is:

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.

Response: The purpose of the form is to obtain information from the enrollee about the allottee designation and to obtain documentary evidence to support the enrollee's claim for qualification for the allotment. The form is completed by either the Job Corps outreach/admissions counselor or the center staff and signed by the student, during a personal interview.

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 t basis for the decision for adopting this means of collection.

Response: The Office of Job Corps has refined its electronic information systems, called the Center Information System (CIS) and the Career Transition Service System (CTS). The CIS and CTS applications are automated systems that collect information for managing center and placement information. The data is entered utilizing a personal computer that transmits the data electronically to a centralized database. From this database, many management and performance reports are created. This process, while enhanced since implementation, has not changed the nature of the process or the burden hours required to complete the form.

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.

Response: Duplication of its activity is minimal due to the procedures in place to prepare and forward this form. It is prepared either at the screener's or the center's contact point, but not both. Since the student's identification number is the identifier and the identifier is the controller, duplication is limited to errors made by preparation rather than a similar document performing the same function somewhere else in the system.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Response: This collection does not impact small businesses.

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.

Response: If this information is not collected, ETA cannot comply with regulations and Job Corps students cannot initiate allotments from their bi-weekly allowance for a qualified dependent, since the Department of Labor handles all student payments and associated deductions.

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 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.*

Response: This request is consistent with 5 CFR 1320. There is no such circumstance.

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. Consultation with those who use this form is an ongoing process. Unless the laws are changed, the frequency of, the nature of, and the use to which this information is put, will remain unchanged.

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 August 14, 2013 (Vol. 78, p 49548). No comments were received.

DOL maintains regular contact with the Job Corps centers and the center operators and Career Transition Services providers for discussions regarding this information collection. No concerns have been brought forward since the last three-year cycle that would suggest changes to the collection instruments.

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

Response: 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.

Response: The law authorizing this program provides for compliance with the Privacy Act in all aspects (20 CFR 638.537, Disclosure of Information). This regulation provides instructions on how to handle information obtained on students. Additionally, the Job Corps Privacy Act Statement (OMB 1205-0025, ETA-652, July 2000) gives each student assurance of confidentiality by describing when the information may be used, who has access to it, and how it may be released.

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: Not applicable; the form does not ask subject questions.

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.• 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 burden hours are explained below.

Respondent Burden:

1,100 respondents x 3 minutes = 3300 minutes / 60 minutes = 55 hours.

Because respondents are students, ETA has assigned a value of $7.25 per hour (federal minimum wage). $7.25 x 55 = $399.

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 the government, or (4) as part of customary and usual business or private practices.

Response: There are no other 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. 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 Finance Managers on the Job Corps centers review the forms of all students, approximately 70,000, assigned to the Job Corps program. It would take them approximately 3 minutes to review the form, and the Finance Managers average about $30.00 per hour 70,000 x 3(minutes) / 60 x $30 = $105,000. ~~There are no added federal costs.~~ 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). $105,000 plus $5,733 = $110,733.

15. Explain the reasons for any program changes or adjustments.

Response: There are no changes to the Burden hours for this form.

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: This information is not collected for publication.

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: Approval is not being sought.

18. Explain each exception to the certification statement.

Response: There are no exceptions.

B. Collection of Information that Employ Statistical Methods

Response: This collection does not employ statistical methods