

SUPPORTING STATEMENT
Standard Job Corps Contractor and Grantee Information Gathering
OMB Control Number 1205-0219

This ICR seeks OMB approval for a revision of the currently approved ICR that expires 8/31/19. Revisions include an additional collection form for demonstration grants and an additional form determined to be a part of this collection. In addition there are some revisions to burden hours as the result of a complete review of this collection.

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 at-risk youths, 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 comprises 6 regional offices and 123 Job Corps centers nationwide.

The regulatory citations are detailed below:

686.945 Provides the procedures for the management of Job Corps student records. These can be found in the Department of Labor's (Department) Privacy Act System of Records Notice (SORN) DOL/GOVT-2 Job Corps Student records management of student records. The Department's Secretary issues guidelines for a system for maintaining records for each student during enrollment and for disposition of such records after separation.

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 123 current centers, 25 are managed and operated by the U.S. Department of Agriculture - Forest Service (USDA) through an interagency agreement. The remaining 98 centers are managed and operated by contractors selected by the Department. These 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.

686.565 Authorizes Job Corps to conduct experimental, research and demonstration projects related to the Job Corps program according to WIOA sec. 156(a), provided that such projects are developed, approved, and conducted in accordance with policies and procedures developed by the Secretary.

To manage the program, Job Corps must collect information from center operators and grantees regularly to exercise its federal oversight duties and ensure safe and smooth operation of the program. In accordance with 5 CFR 1320, the Department is seeking approval for forms connected with the operation of the Job Corps centers and oversight of projects under 686.565.

- 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 had made of the information received from the current collection.*

The information collection activities required of Job Corps contractors and grantees, and described below serve a number of purposes. The operation of the Job Corps program requires that many activities be coordinated with other organizations, both Federal and nonfederal. For example, Job Corps students receive allowance payments through a central system operated under a contract funded by the Department. Center operators are required to collect certain student information in order to coordinate payment of proper allowances for individual students.

Another example is that certain aspects of center operations are not included in the base funding of the contract because they cannot be estimated in advance. These include major medical costs for students, unanticipated transportation costs for students, capital expenditures, and equipment costs. Coordination of these activities and timely and accurate reporting of these costs are required between the contractor and the Federal government to efficiently operate the program.

Most of the information collection requirements of Job Corps operators described below stem directly from operational needs or are necessary to ensure compliance with Federal performance reporting requirements and the terms of their contract or grant. Federal staff use this data to oversee the operation and effectiveness of the program in a variety of ways. Student demographics, attendance, learning gains, high school diploma/high school equivalency, career technical training completion, and credential attainment are included in this category. These data are normally collected and reports generated by an automated data system developed by the Federal government.

- 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.*

Job Corps has implemented electronic information systems designed to gather the data necessary for program management and financial accountability to include the Center Information System (CIS), the Financial Management System (FMS), the Construction, Rehabilitation and

Acquisition System (CRA) and the Job Corps Fund Allocation System (JFAS). The CIS is an automated application that collects information for managing centers and grants (e.g., student enrollment, student accountability, student finances, and student transportation). The FMS is an automated application that collects information related to center operations budget and cost reports and the disposition of property.

The JFAS is used to control the allocation of funds to center operations contracts and other contract activities. The CRA system provides the mechanism for collecting Job Corps center construction, maintenance and repair activities. Job Corps has automated the following Employment and Training Administration (ETA) forms: 2110, 2181, 6-131A, 6-131B, 6-131C, 640, 661, and 328.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified to use for the purposes described in Item 2 above.*

There is no other existing source of data containing similar information. The CIS, FMS, CRS and JFAS systems have been developed exclusively for the purpose of accountability, performance reporting and oversight of the Job Corps program. The Department provides statistical and financial reports directly from system generated data from these sources rather than requiring intermediate levels of reporting. This allows the National Office of Job Corps to develop national/regional totals on student characteristics and outcomes and cost and budget allocations.

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

This collection of information does not affect small businesses.

- 6. Describe the consequence to Federal programs or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing them.*

Changes in the frequency of information collection would have serious operational consequences by reducing the Department's ability to effectively administer and oversee the operation of the Job Corps program and comply with financial reporting requirements.

- 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.*

The Department's administration and oversight of the Job Corps program continues under the scrutiny of Congress, the U.S. Government Accountability Office, the U.S. Office of the Inspector General, and other Departmental entities. The most efficient means of overseeing the performance of the program has proven to be through the collection and review of a wide range

of data, including the data collected in the various instruments described below. For example, the Department is able to ensure the financial health of the program and the provision of adequate services to the students through collection and analysis of two financial reports - the Center Financial Report (2110), and the Center Operations Budget (2181). Review of these reports, which are submitted on at least a quarterly basis, would immediately show, for example, whether a center operator is providing adequate subsistence levels for students. Consequently, these reports are required more frequently for this purpose.

8. If applicable, provide a copy and identify the date 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. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

In accordance with the Paperwork Reduction Act of 1995, the public was allowed 60 days to comment through the *Federal Register* notice posted on June 18, 2019 (84 FR 28336). One public comment was received which was determined to be non-substantive.

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

Other than the remuneration of contractors or grantees, Job Corps does not provide any payment 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.

Keeping information private with regard to student social security numbers and student records, including student medical records, is covered in WIOA regulations, the Job Corps PRH and the Department of Labor's Privacy Act SORN DOL/GOVT-2, Job Corps Student Records. The regulations implementing WIOA and the PRH require that all student records be maintained and disclosed in accordance with the Privacy Act of 1974 and the Health Insurance Portability and Accountability Act (HIPAA). In addition, Privacy Act and HIPAA notices are given and explained to each student, stating explicitly how the information is to be used, who has access, and how it can be released and to whom. In addition, information provided is subject to the rules

Standard Job Corps Contractor Information Gathering

OMB Control No. 1205-0219

August 2019

governing the disclosure of proprietary, business confidential, and procurement sensitive information.

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.

There are no other questions of a possible “sensitive” nature other than what is addressed above.

12. *Provide estimates of the hour burden of the collection of information.*

Job Corps Center Operator and Grantee Information Collection Requirements

Federal requirements regarding contractor information collection activities fall into a number of categories. From a burden hour standpoint, burden has been minimized due to the implementation of automated systems (CIS, FMS, CRS and JFAS) which only require entry by users for data that is already collected. Some information collection activities relate to student enrollment, education, vocational, employment and payroll matters. Other modules within the centralized database contain Portable Document Format (PDF) forms.

Record keeping requirements are contained in the Job Corps PRH, and are incorporated by reference into the contract for 98 contractor-operated centers. The remaining 25 centers are operated by the USDA, and are required through an interagency agreement with the Department of Labor to report on the same information as the contractor operated centers. Record keeping requirements for grantees are contained within the grant documents.

Automated Data Collection: Data collection for the Center, Staff Vacancy, and Grantee Financial Reports (4,170 hours) and the Center Budget Reports (1,476 hours) occurs at least quarterly, and is essential to ensuring contractor financial compliance with contractual requirements and orderly operation of the program. Together these reports total 5,646 burden hours.

Center Information Data Collection: Data collected on Forms 6-131A, 6-131B, 6-131C, 640 and 661, which relate to student profiles, behavior and separations including the results of disciplinary actions are being collected in CIS from data input screens that electronically transmit the data to a centralized database. Grantee data collection will occur separately within the CDSS suite of applications. The burden associated with the input of data to the data screens is 50,603 hours.

PDF Forms: Major record keeping and operational forms related to student facility matters are provided in PDF format. They are OJC 6-36, 6-37, 6-38, and 6-39. The burden for processing these forms is 661 hours.

Center Plans: Approximately 12,275 burden hours are estimated to revise and submit existing Center Operating Plans in addition to Center Maintenance Plans, Construction and Rehabilitation Reports, Property Inventory Reports, Annual Career Technical Skills Training (CTST), Annual Staff Training, Health and Wellness Center Annual Program Descriptions, Alcohol Testing Reports, and Immunization Records. The burden for collecting these reports is 19,053 hours.

The charts below provide detailed information on the forms. Further explanation of the burden hours is also explained below.

Financial Information: Data collection for the Center and Grantee Financial and the Center Operations Budget Reports is made at least quarterly, and is essential to ensure contractor

Standard Job Corps Contractor Information Gathering
 OMB Control No. 1205-0219
 August 2019

financial compliance with contractual requirements and orderly operations of the program. The total burden associated with these activities is 5,646 hours.

| Required Activity | ETA Form Number | Number of Respondents | Submissions Per Year | Total Annual Submissions | Hours Per Submission | Total Burden Hours |
|----------------------------------|-----------------|-----------------------|----------------------|--------------------------|----------------------|--------------------|
| Center Financial Report | 2110 | 123 | 12 | 1,476 | 2 | 2,952 |
| Grantee Financial Report | 2110 G | 20 | 12 | 240 | 2 | 480 |
| Center Vacancy/Separation Report | 2110 S | 123 | 12 | 1,476 | 0.5 | 738 |
| Center Operations Budget | 2181 | 123 | 4 | 492 | 3 | 1,476 |
| Total | | 389 | | 7,620 | | 5,646 |

Student Enrollment Management Information: Center and grantee staff enters data utilizing a personal computer that transmits the data electronically to a centralized database. Several management and performance reports are created from this database. Student personnel requirements such as student payroll information, student training and education courses received, student leave, disciplinary actions and medical information are also collected and maintained electronically in the Center Information System (CIS). Total burden associated with these activities is 50,603 hours.

| Required Activity | ETA Form Number | Number of Respondents (one person per center/grant) | Submissions Per Year | Annual Submissions | Hours Per Submission | Total Burden Hours |
|----------------------------|-----------------|---|----------------------|--------------------|----------------------|--------------------|
| Disciplinary Discharge | 6-131A | 123 | 97 | 11,877 | 1 | 11,877 |
| Review Board Hearings | 6-131B | 123 | 97 | 11,877 | 1 | 11,877 |
| Rights to Appeal | 6-131C | 123 | 97 | 11,877 | 1 | 11,877 |
| Student Profile | 640 | 123 | 349 | 49,007 | 0.15 | 7,486 |
| Grant Data Collection Form | NEW | 28 | 707 | 19,800 | 0.33 | 6,600 |
| Student Separation | 661 | 123 | 349 | 49,007 | 0.15 | 7,486 |
| Total | | 643 | | 148,265 | | 50,603 |

Note: Burden calculations based on Program Year 2017 data and estimates of grant requirements.

Facilities Information: Major record keeping and operational forms that pertain to facility matters are provided in Portable Data Files or PDF format. The total burden for processing these forms is 661 hours.

| Required Activity | OJC Form Number | Number of Respondents (one person per center) | Submissions Per Year | Annual Submissions | Hours Per Submission | Total Burden Hours |
|--|-----------------|---|----------------------|--------------------|----------------------|--------------------|
| Environmental Health Inspections | OJC 6-36 | 123 | 4 | 492 | 0.5 | 246 |
| Inspection of Residential & Educational Facilities | OJC 6-37 | 123 | 4 | 492 | 1.25 | 615 |

Standard Job Corps Contractor Information Gathering
 OMB Control No. 1205-0219
 August 2019

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|--|----------|-----|---|-----|------|-----|
| Inspection of Waste Treatment Facilities Costs | OJC 6-39 | 23 | 4 | 92 | 0.25 | 23 |
| Inspection Water Supply Facilities | OJC 6-38 | 23 | 4 | 92 | 0.25 | 23 |
| Total | | 292 | | 676 | | 661 |

Plans and Reports: We estimate 19,053 burden hours for preparation of the center plans listed below that are required for the operation of a Job Corps center.

| Required Activity | OJC Form Number | Number of Respondents (one person per center) | Submissions Per Year | Annual Submissions | Hours Per Submission | Total Burden Hours |
|---|-----------------|---|----------------------|--------------------|----------------------|--------------------|
| Center Operations Plan | PRH Required | 123 | 1 | 123 | 30 | 3,690 |
| Construction and Rehab Report (CRA) | PRH Required | 123 | 4 | 492 | 2 | 984 |
| Center Preventive Maintenance Plan (CRA) | PRH Required | 123 | 1 | 123 | 2 | 246 |
| Annual CTST | PRH Required | 123 | 1 | 123 | 24 | 2,952 |
| Annual Staff Training | PRH Required | 123 | 1 | 123 | 1 | 123 |
| Health and Wellness Center Annual Program Description | PRH Required | 123 | 1 | 123 | 1 | 62 |
| Alcohol Testing Report | PRH Required | 123 | 12 | 1,476 | 0.20 | 295 |
| Immunization Record | PRH Required | 123 | 375 | 46,125 | 0.20 | 9,225 |
| Property Inventory | 3-28 | 123 | 12 | 1,476 | 1 | 1,476 |
| Total | | 1,107 | | 50,184 | | 19,053 |

Total estimated number of respondents: 2,451; total estimated annual responses: 202,809; total estimated burden of all types: 81,516 hours.

Burden Hours

| | |
|------------------------------------|--------|
| Automated Forms | 5,646 |
| Center Information Data Collection | 56,156 |
| PDF Forms | 661 |
| Plans and Reports | 19,053 |

Total Burden Hours 81,516

While precise costs cannot be identified, based on past experience, the annual and related costs for contractor and grantee staff are estimated to be \$2,126,958 which represents an average cost of \$28.00 per hour.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information.

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.

The maintenance costs associated with the system are estimated to be \$2.7 million a year for hardware and software. No collection costs are associated with the burden hours. Collection costs are compensated by contractual arrangement or Memorandum of Understanding with the center operators. Total burden estimates are based on staff experience and consultation with center contractors.

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

A recent review of the Job Corps contract and operator reporting requirements in the PRH identified an additional form; Environmental Health Inspections (OJC Form 6-36) which should be included in this revision request for an additional burden of 246 hours. Other adjustments were made because some requirements listed in the current collection like the Energy Conservation Report were redundant and deleted because they were already listed under an OMB collection from other agencies. Job Corps also made improvements to some forms in order to collect more detailed information and improve the program's oversight, in many cases without causing a significant increase in burden. There was a reduction in number of respondents because of the closure of three Job Corps centers since the last collection approval. An additional data collection burden results from the experimental, research and demonstration projects related to the Job Corps program. Because of the above changes, there is a net increase in burden of 27,074 hours.

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.

Much of the data from these collections are aggregated into reports published on Job Corps' public website (listed below) and for WIOA required reports to congress.
<https://www.jobcorps.gov/job-corps-reports>

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.

The Department will display the OMB-approved expiration date for the collection of this information. ETA will make notification of the new expiration date through a Job Corps directive, once approved.

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.