

SUPPORTING STATEMENT
Student Safety Assessment of Job Corps Centers
OMB Control Number 1205-0542

This information collection request (ICR) seeks OMB approval for the revision to the Job Corps Student Safety Assessment (SSA). This assessment is necessary for program evaluation to gauge active students' sense of safety and security while living on centers.

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. Job Corps was originally established by the Economic Opportunity Act of 1964. The program transferred from the Office of Economic Opportunity to the Department of Labor in 1969. In 1978, Job Corps was authorized as part of the Comprehensive Employment and Training Act under Title IV-B. 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 federally administered through the Department of Labor, Employment and Training Administration, Office of Job Corps ("Job Corps" or the "Program"). The Program is comprised of the Job Corps national office and 6 regional offices providing oversight of 121 Job Corps centers nationwide. The Workforce Innovation and Opportunity Act (WIOA) of 2014 at §§ 159 (b)(2), (f)(1), and 159(g)(1) as well as the implementing regulations at 20 CFR 686.100 directs Job Corps to ensure the safety and security of Job Corps students and to evaluate the performance of center operators, including performance with respect to safety and security.

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.*

Measuring Job Corps students' safety is important for several reasons. the Job Corps is primarily a residential program, inclusive of minor students, ages 16 and 17. Centers must ensure that measures are in place to always provide students with a safe environment. Additionally, the Department of Labor contracts directly with the companies that operate most centers. The Department of Labor management and contract officials must be able to determine if the center operators are fulfilling their contractual obligations; paramount is the obligation to provide and sustain a safe environment for all students.

Job Corps students are afforded an opportunity through the Student Safety Assessment (SSA) to express any concerns or issues about their safety and provide more information for federal managers and center operators to provide better oversight. The SSA allows for a more robust

measurement of the safety of the Job Corps students, than its precedent instrument, the Student Satisfaction Survey (SSS). The SSA instrument was approved in June of 2020. The administration of the survey has been delayed largely due to the COVID-19 pandemic and related issues. The SSA questions are about violence, drug and alcohol availability and use on center, and the climate of the center. Additionally, the instrument now contains four new questions about pandemic safety on center, which will only be used when there is a disease, like COVID-19, resulting in significant disruption to Job Corps campuses. Job Corps also administers a quarterly student survey related to student satisfaction with the program.

As provided for in WIOA §§ 159 (b)(2) and (f)(1), the Program must evaluate the centers at least every three years and assess centers' performance annually. These evaluations are carried out as described in the Job Corps Policy Requirements Handbook (PRH), which prescribes the SSA as part of the Center Quality Assessment. The SSA is the primary tool through which data relating to student safety and security is collected from active students regarding feelings and perceptions of safety on centers.

- 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.*

The SSA is a web-based instrument, that can be accessed and completed on any internet-enabled device. The electronic format reduces the participant burden, allows for more accurate data collection and provides an increased ability to conduct analysis and provide results timelier.

- 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.*

As noted, previously, the SSS contained both student satisfaction and safety-related questions. The SEA now contains the student experience and satisfaction items previously in the SSS, and the SSA is a stand-alone assessment containing safety and security related questions. The SSA will be the only instrument used to collect student perceptions of safety and security on Job Corps centers, so there is no similar information already collected from students, or duplication of data collection on this assessment and the SEA. Other Job Corps safety and security information is provided in the form of center operators' reports, including Significant Incident Reports, reported Behavior Infractions, and other such program data. However, such information is not collected directly from students and is not duplicative of the SSA.

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

No burden is placed on 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.

The SSA is the only method to obtain students' perceptions of safety and security during their Job Corps experience. Eliminating this collection would seriously impair oversight efforts. This information is vital in assisting the national and regional office leadership in understanding student perspectives in order for them to make data-driven decisions and implement policies and procedures that result minimize risk and maximize safety.

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.*

Special circumstances in 5 CFR 1320.5 are as follows:

- * 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.*

This data collection is completely voluntary. There are no special circumstances that require responses, in all cases students' responses are voluntary. Job Corps is requesting a two-tiered administration system to prevent future complications with center capacity like those that occurred during the COVID-19 pandemic. Students are asked to complete the survey quarterly when the pool is less than or equal to 22,100 eligible students. It is a monthly random sample when there are more than 22,100 eligible students enrolled in the program. Monthly survey administrations allow for the Office of Job Corps to identify safety issues when enrollment is high.

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 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 of 1995, the public was allowed 60 days to comment on this information collection by way of a *Federal Register* notice published on February 7, 2023 (88 FR 7997). No public comments were received.

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

The U.S. Department of Labor will not make any payments or gifts to respondents for completing the survey.

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

All Job Corps survey respondents are informed that completing the survey is voluntary and that individual responses are private. Only aggregated results will be shared with Center operators to whom the surveys pertain. The only exception is when students report a safety concern that requires immediate action due the threat of harm to themselves or others. The survey provides the students with a hotline number if they need to report an immediate safety concern. Data collected through the survey instruments will not be made publicly available in disaggregated form.

This survey is conducted in accordance with all relevant regulations and requirements, including the Privacy Act of 1974 (5 USC 552a), DOL's Privacy Act Regulations (29 CFR Part 71), the Freedom of Information Act (5 USC 552) and DOL's Freedom of Information Act regulations (29 CFR Part 70).

The Job Corps PRH, which establishes the rules and procedures for both contract-operated and USDA-operated Job Corps Centers, prohibits center operator staff from observing or reviewing students' completion of the survey, unless requested by the student. Once students complete and

submit the survey electronically, it is stored at Decision Information Resources, Inc (DIR), in a secure network environment and is not released to center operators in disaggregated form. Federal Job Corps staff are able to view the survey results in a format that is disaggregated but anonymized, unless there is a concern about the immediate safety of the student or the Center.

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.

The Student Safety Assessment (SSA) does not ask students to report their own behaviors, including sexual behaviors and attitudes, religious beliefs, or substance use or abuse. The survey does include questions about a students' knowledge of violent and disruptive behaviors, substance use, and other rule violations at the center. These questions are required to determine the overall level of safety at the Job Corps centers. The SSA is voluntary. At the start of the survey students are informed of the purpose of the survey, that the survey is voluntary, and that the survey is private. The first question asks if the student is willing to take the survey; if the student response is "No" the survey is ended and the identity of students who responded "No" is not shared with the center. Additionally, the Job Corps students can choose to stop taking the survey if at any point they object to the questions.

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."*

A two-tiered system approach will be used such that the survey is administered quarterly as a census survey, when the student population is below or equal to 22,100 eligible students. The annual burden if a census survey is used for four quarters is approximately 21,000 hours. When the student population is above 22,100 eligible students, then the survey could be administered as a monthly random sample survey. The annual estimated number of respondents is 141,672 with a burden of 35,418 hours. The average amount of time to complete the survey is about 15 minutes.

The quarterly census survey and the monthly random sample survey methods will never be used simultaneously. If the census survey method was used during a quarter, the monthly random sample survey method will not be used during that same quarter. Therefore, the highest annual respondent burden with this data collection effort is estimated at approximately 35,418 hours. Table 1 shows the total burden of 57,518 hours, as a sum of these two methods.

There will be no cost to respondents. The survey will occur during their active enrollment in Job Corps.

Table 1: Estimates of Respondent Burden Average Time

Activity	Number of Respondents *	Frequency	Total Annual Responses	Time Per Response (Hours)	Total Annual Burden (Hours)	Hourly Wage Rate**	Monetized Value of Respondent
SSA Survey (Sampling)	11,806	12	141,672	.25	35,418	\$0	\$0
SSA Survey (Census)	22,100	4	88,400	.25	22,100	\$0	\$0
Unduplicated Totals***	33,906	16	230,072	.25	57,518	\$0	\$0

* Respondents can take the survey more than once during their enrollment based on sampling.

** The survey does not affect the hourly rate since the respondent is an OJC student

*** The survey will be administered monthly as a sample or quarterly as a census; the highest total annual burden is based on the sum.

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 additional costs to the respondents for participating in this survey.

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.

The estimated annual cost to administer the Student Safety Assessment is \$374,137. This includes the costs of time and materials for contractor personnel to prepare the survey; process and analyze the data; provide monthly and quarterly reports; maintain a dashboard that allows

for easy monitoring of the SSA results nationally, regionally, and by center; and ensure that response rates are at acceptable levels through trainings and materials.

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

The burden worksheet for the SSA Survey was adjusted. The worksheet now includes the alternative to the census sample when the number of active Job Corps students is 22,100 students or fewer. This adjustment was needed since the reduced population leads to a reduced sampling pool and results in a limited ability to use the sampling method described for the monthly administration of the survey. Therefore, we added the possibility of a quarterly census survey when the population of Job Corps is 22,100 or fewer. This is an alternative method not an additional method. A full year of quarterly census survey administration will reduce the burden compared to quarterly random sample administrations when the capacity is higher. This adjusts the annual survey burden as shown in Table 1. The estimated total burden is a sum of these two different methods, resulting in a higher 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 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 data collected will not be published publicly.

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 instruments will be administered online and will include the OMB expirations dates.

18. Explain each exception to the topics of the certification statement identified in “Certification for Paperwork Reduction Act Submissions.”

There are no exceptions.