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January 27, 2017

Ms. Andrea Kyle
U.S. Department of Labor
Employment and Training Administration
Office of Job Corps
200 Constitution Avenue NW, Room N4507
Washington, DC 20210

RE: OMB Control Number 1205-0025 Comments

Dear Ms. Kyle:

Horizons Youth Services is providing the below responses to the Department's solicitation for comment concerning the proposed extension for the authority to conduct the information collection request (ICR) titled, "Job Corps Application Data." We have organized our response into the four sections listed as particular interest the Department in the Federal Register

1. Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility:

Job Corps Data Sheet

We do believe that the collection of information on page one, the Job Corps Data sheet is necessary as it documents the eligibility requirements for the program. The Job Corps Data Sheet does require updates which we have noted in response to question three.

Application Commitment Statement

While we understand the goal of the Applicant Commitment Statement, we do not believe it has practical utility. The Applicant Commitment Statement is not consistent with Job Corps policy. Commitment is not an eligibility requirement for Job Corps. While Essential Admissions Requirement, Criterion J - Group Participation and Understanding of Rules lists the Applicant Commitment as the documentation for this requirement we do not see any correlation between the applicant's commitment and the commitment statement to Job Corps and an applicant's ability or willingness to participate in groups or understand the rules.

Expectations

We believe that the “Expectations” section, while not necessary for performance, does contribute because it aides in ensuring that applicants are aware of what Job Corps will expect of them. We have made a few suggestion in response to question three to make the “Expectations” section more effective in preparing applicants.

Job Corps Consent Record

We do believe that the acknowledgment of information on page two-three the Job Corps Consent Record is necessary as it acknowledges that the admissions counselors has made the applicant and parent/guardian aware of what they are agreeing to by signing the consent record.

Job Corps Zero Tolerance for Violence Certification

We do believe that the acknowledgment of information on page three the Job Corps Zero Tolerance For Violence Certification is necessary as it ensures that the applicant and their parent or guardian is aware of our zero tolerance policy and will be terminated for a violation. This section requires an update to be consistent with current policy, we have provided our recommendation below in response to question three.

Job Corps Readmission Information

We do not believe that the Job Corps Readmission Information, in its current format is necessary for proper performance nor does it have practical utility. The Recommendation of Admission Counselor is also redundant as the Admission Counselor is already providing their recommendation in the EARS as well by the fact that they are assign the file to a center for consideration. We would recommend that this section be removed or be revised.

Statement from Court or Other Agency

We feel that the Statement from Court or Other Agency is a dated form that could be revised or possibly eliminated. While we see value in the information collected on the Statement from Court or Other Agency the reality is this form is frequently completed by the admissions counselor as criminal background checks are obtained electronically and scanned into the applicant’s e-folder as part of their application.

As Job Corps prepares to institute a consistent National Background screening system this create a perfect opportunity for this form to be re-considered. It is necessary to have a form to document criminal background checks for minors and to document efforts that admissions counselors have made to obtain criminal background information on minor applicants.

Child Care Certification

We believe that the Child Care Certification is necessary for students who have dependent children. An applicant would not be able to take advantage of the Job Corps programs if they are concerned or worried about the care of their dependent child(ren).

2. Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

Using the OIRA Conclusion Information provide below we do not believe the agencies estimate of the burden of the proposed collection of information is accurate. The completion of the Job Corps Data Sheet (page 1) requires gathering and collecting of demographic, alternate contact, citizenship status, employment history, family income, dependent information, language fluency, military enlistment, criminal history, Career Technical Training interest and center of assignment.

The Job Corps data sheet is one of eight pages in this form. The information is gathered sometimes over multiple meetings/conversations as supporting documents are required to be provided. In addition to entering this data, the form must be printed, signed and then scanned to the student's e-folder.

The applicant Commitment Statement, Expectations, Job Corps Consent Record, and Job Corps Zero Tolerance for Violence Certification (three of the eight pages) requires the admissions counselor to explain what the applicant is signing, reviewing each statement and expectations. It requires the admissions counselor to review and explain zero tolerance policy and assess the applicant's comprehension.

From our experience this process takes at minimum one hour for an applicant that is prepared and has grade level literacy and comprehension skills. Depending on a student's comprehension, English proficiency, or literacy level this process can take much longer. It may take longer depending on where the student has lived in the past three years and how many criminal background checks have to be completed. We believe that the estimate of time burden is significantly lower than it actually takes.

The OIRA Conclusion also states that there is no cost burden and we would suggest that staff resources used to complete, enter and audit these forms should be considered a cost burden. There is a cost burden to the applicant if they must obtain copies of their birth certificate or other required documents to document their eligibility.

View ICR - OIRA Conclusion			
OMB Control No: 1205-0025		ICR Reference No: 201306-1205-004	
Status: Active		Previous ICR Reference No: <u>201004-1205-001</u>	
Agency/Subagency: DOL/ETA		Agency Tracking No:	
Title: Job Corps Application Data			
Type of Information Collection: Extension without change of a currently approved collection		Common Form ICR: No	
Type of Review Request: Regular		Conclusion Date: 01/16/2014	
OIRA Conclusion Action: Approved without change		Date Received in OIRA: 11/08/2013	
Retrieve Notice of Action (NOA)			
Terms of Clearance:			
	Inventory as of this Action	Requested	Previously Approved
Expiration Date	01/31/2017	36 Months From Approved	01/31/2014
Responses	179,723	179,723	92,122
Time Burden (Hours)	16,201	16,201	18,424
Cost Burden (Dollars)	0	0	0

Enhance the quality, utility, and clarity of the information to be collected; and

When this form was implemented pre 1975, it may have been the most effective way to collect this data. The current collection process is completely dependent on the applicant voluntarily providing the information to an admissions staff member and the staff member entering the data.

Technology creates several opportunities to consistently collect accurate information. Job Corps has not embraced the technology available and opportunities to make the admissions process more efficient and engaging.

First we would recommend that similar to the US Department of Education's FASFA application the Job Corps' application automatically verify applicant and/or their guardian's income through the IRS. This would minimize the use of the Statement of Support as well as the possibilities of applicants or parent/guardians providing limited information.

Second we would recommend that applicants are able to enter their own information which would minimize the possibility of data entry error by the admission's staff and would allow admission staff to serve more of a quality assurance role by validating what the applicant has entered. This would also engage the applicant in the process and make them feel more in control.

Third we would recommend that the Job Corps admission system reconcile names and social security numbers in real time to ensure information is entered correctly and is accurate.

Below are some specific recommendation needed for the specific sections of the form:

Job Corps Data Sheet

The Job Corps Data Sheet does require updates to remain consistent with current terminology for example GED should read HSE and Bilingual Program Req should read ELL Program Req.

Application Commitment Statement

The applicant commitment refers to Job Corps being a scholarship program, which is not consistent with Job Corps marketing and implies applicants are being awarded a monetary amount of money to attend Job Corps. The language is not current with the terminology used in Job Corps:

- Academic Education is redundant and suggest Academic Training
- Vocational Training vs Career Technical Training
- GED vs High School Equivalency Diploma
- Social Skills vs Career Success Standards

The application statement talks in two different instances about employment or job versus placement (inclusive of military enlistment, college enrollment, America Corps etc...) we would recommend that this be updated.

Expectations

We would recommend that Expectations be separated and become it's own document requiring applicants to initial each expectation. It would also be recommended that the expectation be updated to include current expectation such as participation in Career Preparation, participation in work based learning, obtain placement at the termination/completion of the program, and participate in Job Corps follow-up surveys...

One expectation implies that students must be drug free at arrival; however current policy allows students to enroll with drugs in their system. While students who test positive must participate in Job Corps TEAP program this statement is misleading and may give those student who test positive on enrollment the impression that they will not be terminated from Job Corps if they are positive for their second drug test. It would be recommended that the expectation be more consistent with practice.

Job Corps Consent Record

The Job Corps Consent Record does require updates to remain consistent with current terminology for example vocational offerings should read Career Technical Training Offerings.

Job Corps Zero Tolerance for Violence Certification

This section requires an update to be consistent with current policy, below is a list of items that we believe should be added to the Job Corps list of offenses that require automatic removal from the program:

- Threat to Safety needs to be added
- Use of drugs by evidence by a positive test
- Possession, consumption, or distribution while on center or under center supervision
- Abuse of Alcohol
- Arrest for a felony or violent misdemeanor on or off center
- Illegal Activity
- Cruelty to animals
- Inciting a disturbance or creating disorder

Job Corps Readmission Information

We would recommend that the Readmission Agreement and the Recommendation of Admission Counselor be removed from this document and become a separate document. We would recommend a more robust readmission application process to ensure and document that the applicant is sincere and motivated to return to Job Corps and take full advantage of the benefits and opportunity the program can provide.

Statement from Court or Other Agency

This form has become dated as most background checks are completed electronically and admissions staff do not speak with a representative from the court. We would recommend that this form be eliminated or revised to actually document the information obtained on the electronically obtained criminal background check without being redundant. We would recommend that specifically Section II be reconsidered, which is to be completed by the court, Supervising Agency, or Authorized person, as this section is rarely utilized. We would recommend that new forms be developed, one to document the collection of adult criminal background checks and another to document the attempts and/or collection of minor's criminal background checks.

- 3. Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

The current process to collect applicant data requires a staff member to enter the information into OASIS. The process to enter applicant data and then to scan required documents takes several hours in totality and can take longer depending on Job Corps

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system latency issues. We would recommend that the collection system be modified to be more student focused and less time intensive for staff. We would recommend that the Job Corps application collection process mirror the process of many colleges and universities across the country. The process allows the applicant to enter their own information and upload their documents into the application system.

Admission staff would be required to review and verify the information the information entered and scanned. The benefits of implementing a system like this is it engages the applicant and allows them to be more in control of the process. This process would minimize the amount of time staff spend entering applicant data while allowing them to increase their focus on quality assurance of the data entered.

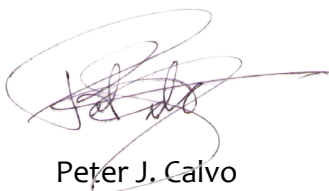
Currently admissions staff can only access and enter applicant data when they have access to the internet. Admissions staff are frequently in the field completing applications which means they are using printed materials and have to wait until they return to their office to enter the information into the system. Not only does the present a risk in applicant's PII being compromised in some cases the admission counselor has to double work.

Currently the applicant data information must be printed, signed and then scanned into the same system the forms were generated to the applicant's e-folder. We believe this is not efficient and not environmentally conscious.

We suggest that the agency enhance its system to include electronic signatures which not require the documents to be printed just to obtain signatures to eventually be scanned and discarded. This would minimize the time needed to completed the process as well minimize the waste of paper.

Thank you for the opportunity to provide these recommendations and for taking the time to consider them. We believe that these recommendations will allow for a more efficient process to collect applicant data as well as reduce paperwork and respondent burden. If you have any questions or require additional information, please feel free to contact Mr. Jimmy McDonough at (540) 421-5579.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Peter J. Calvo', with a stylized flourish extending to the right.

Peter J. Calvo
President

Copy: Mr. Jimmy McDonough, Corporate OA/CTS Director