

119492

BY THE COMPTROLLER GENERAL

## Report To The Secretary Of Labor

OF THE UNITED STATES

# The Department Of Labor Has Not Adequately Controlled Office Of Job Corps Information Collection Activities

The Department of Labor is imposing a relatively large number of paperwork requirements on contractors who operate Job Corps Centers.

Under the Paperwork Reduction Act of 1980, these Federal paperwork requirements must be approved by the Office of Management and Budget before they can be imposed on the public. The Department has failed to obtain these approvals.

GAO recommends that the Department determine which requirements are needed and used and have them approved by OMB.



119492

GAO/GGD-82-100

SEPTEMBER 22, 1982

023422

**Request for copies of GAO reports should be sent to:**

**U.S. General Accounting Office  
Document Handling and Information  
Services Facility  
P.O. Box 6015  
Gaithersburg, Md. 20760**

**Telephone (202) 275-6241**

**The first five copies of individual reports are free of charge. Additional copies of bound audit reports are \$3.25 each. Additional copies of unbound report (i.e., letter reports) and most other publications are \$1.00 each. There will be a 25% discount on all orders for 100 or more copies mailed to a single address. Sales orders must be prepaid on a cash, check, or money order basis. Check should be made out to the "Superintendent of Documents".**



UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

HUMAN RESOURCES  
DIVISION

B-208783

The Honorable Raymond J. Donovan  
The Secretary of Labor

Dear Mr. Secretary:

We recently completed a survey of education-related reporting and recordkeeping requirements imposed on the public by Federal agencies. Our work at the Department of Labor (DOL) was limited to the Office of Job Corps which provides education and training to disadvantaged youths. Our objective was to determine whether the Job Corps was carrying out its information collection activities in accordance with the policies and procedures established by the Paperwork Reduction Act of 1980.

We are sending this report to you because DOL has overall responsibility for ensuring the Job Corps' compliance with the act's policies and procedures.

We identified 56 reporting and recordkeeping requirements the Job Corps was imposing on its contractor-operated centers without Office of Management and Budget (OMB) approval which is required by the Paperwork Reduction Act. We believe these reporting and recordkeeping requirements should be reviewed promptly to determine whether they are needed and used or should be revised. Those that are needed and used, including any that are revised should be submitted to OMB for approval. Any that are not needed should be eliminated.

We also believe that the existence of such a number of unapproved requirements, combined with the fact that cognizant DOL officials were unaware that these requirements needed OMB approval indicates that DOL needs to strengthen controls over its information collection activities.

The DOL survey was conducted at the Office of the Assistant Secretary for Administration and Management and the Office of Job Corps in Washington, D.C.; Job Corps Region III; and several contractor-operated Job Corps centers. We also visited DOL's Job Corps printing and distribution center located in Region VI. This review was performed in accordance with GAO's "Standards for Audit of Governmental Organizations, Programs, Activities, and Functions."

PAPERWORK REDUCTION ACT  
REQUIRES AGENCIES TO  
CONTROL PAPERWORK BURDEN  
IMPOSED ON THE PUBLIC

In order to control the paperwork burden imposed on the public, the Paperwork Reduction Act of 1980 requires each Federal agency to carry out its information management activities in an efficient, effective, and economical manner and to comply with the policies, principles, standards, and guidelines prescribed by the Director, OMB.

The Paperwork Reduction Act also requires each agency to designate a senior official responsible for reporting directly to the agency head and for carrying out all the functions covered by the act. In DOL, the designated senior official is the Assistant Secretary for Administration and Management.

The act provides that an agency shall not conduct or sponsor the collection of information from the public without OMB approval. Information collection is defined as the obtaining of facts or opinions by an agency through the use of forms, schedules, questionnaires, or similar methods requiring answers to identical questions posed to 10 or more respondents.

An agency is not allowed to engage in the collection of information without first obtaining from the Director, OMB, an approval number to display on the reporting or recordkeeping requirement.

DOL DID NOT OBTAIN  
REQUIRED OMB APPROVAL  
FOR MANY JOB CORPS  
DATA REQUIREMENTS

We identified 56 reporting and recordkeeping requirements the Job Corps had imposed on its contractor-operated centers which had not been properly approved by OMB. Contractor-operated centers are Government-owned training and educational facilities managed and operated by private companies. The requirements included those imposed nationwide by DOL as well as those developed and used in Region III. The use of unapproved, expired, or obsolete requirements imposes an unneeded reporting burden on respondents.

The Job Corps implements its information collection activities by using DOL forms, Employment and Training Administration (ETA) Bulletins, Regional Field Instructions, and Job Corps Notices and Bulletins.

Of the 56 unapproved DOL reporting and recordkeeping requirements we identified, 27 were specifically listed and required by Job Corps contracts, 15 were identified in the contracts and required to be reported in accordance with local Job Corps instructions, and 14 were developed by Region III and imposed on the Region III Job Corps centers. (See app.I.)

Some of the 56 unapproved requirements were simple and straightforward, while others were complex and burdensome to respondents. For example, the Summary Report of Federal Occupational Property Damage Incidents (JCN-81-10) required only 4 lines of data. On the other hand, the Health Management Information System Needs Assessment Survey (Region III, ETA, JC-31-81) was a 9-page questionnaire.

Several of the reporting and recordkeeping requirements should have been reviewed and revised by DOL years ago. For example, the Job Corps was still using 17 Manpower Administration forms, even though the Manpower Administration was reorganized into DOL's Employment and Training Administration more than 7 years ago.

We also identified one reporting requirement that contained obsolete and inappropriate racial classifications. The DOL Region III Center Operations Report contained classifications such as Negro, Spanish-American, and Oriental, instead of the presently used classifications of Black, Hispanic, and Asian or Pacific Islander.

DOL SHOULD IMPROVE CONTROLS  
OVER ITS INFORMATION  
COLLECTION ACTIVITIES

The Department of Labor needs to improve its controls over reporting and recordkeeping requirements contained in contracts as well as other related requirements developed by its regional offices. DOL headquarters officials, responsible for controlling departmentwide information collection activities, did not believe that the requirements contained in contracts required OMB approval.

DOL officials did not believe  
OMB approval was needed for  
reporting and recordkeeping  
requirements in contracts

OMB Circular A-40 provides Federal agencies with the guidance necessary to obtain OMB approval for their reporting and recordkeeping requirements. Unfortunately, OMB has not

revised the circular since the passage of the Paperwork Reduction Act. Outdated though it is, the circular remains in effect. Circular A-40 is quite clear regarding the need for OMB approval of reporting and recordkeeping requirements contained in contracts. Paragraph 7(b) sets forth the types of requirements that are exempted from OMB approval as follows.

"Forms calling for technical information incident to the design, production, or operation of contract items, such as engineering drawings, specifications and standards, parts breakdown lists, catalog items identification, or descriptions of physical qualities and characteristics. ("Technical information" does not include financial, administrative, cost and pricing, management and management planning data, or other information incidental to contract administration.)" (Emphasis supplied.)

All the reporting and recordkeeping requirements we identified in Job Corps contracts appear to be in the nonexempt category and thus subject to OMB approval.

DOL headquarters officials were unaware of the need for OMB approval of reporting and recordkeeping requirements specified in Job Corps contracts. They believed that these requirements were exempt from OMB approval because they were used by DOL for contract administration.

### CONCLUSIONS

The relatively large number of unapproved reporting and recordkeeping requirements imposed by DOL without OMB approval, indicates that DOL needs to improve controls over its information gathering activities. DOL headquarters officials were unaware that they needed to obtain OMB approval for all such requirements imposed on 10 or more respondents. We believe the unapproved reporting and recordkeeping requirements identified in this report should be promptly reviewed, and revised as necessary. After that, OMB approval should be obtained for those which continue to be needed. We also believe DOL controls over information collection activities related to contracts should be strengthened.

### RECOMMENDATIONS TO THE SECRETARY OF LABOR

Because DOL has overall responsibility for ensuring the Job Corps' compliance with the Paperwork Reduction Act's policies and procedures, we recommend that you direct the Assistant Secretary for Administration and Management to ensure that the unapproved reporting and recordkeeping requirements we identified are promptly reviewed to determine whether they are needed and used in their present form or whether they warrant

revision. Those which continue to be needed, including any that are revised, should be promptly submitted to OMB for approval.

We also recommend that you direct the Assistant Secretary for Administration and Management to ensure that adequate controls are established for identifying and obtaining OMB approval for all unapproved DOL reporting and recordkeeping requirements contained in contracts and related requirements developed and used by DOL regional offices.

AGENCY COMMENTS

We did not obtain formal agency comments on our report, but we did discuss the findings with DOL's clearance office director. He concurred with the facts in our report, including the listing of unapproved reporting and recordkeeping requirements. He said that DOL is presently reviewing its reporting and recordkeeping requirements, including those required in Job Corps contracts, to determine which ones are needed, used, and require OMB approval. According to the Director, the requirements that are determined to be needed will be sent to OMB for approval; the remainder will be eliminated.

- - - -

As you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written statement on actions taken on our recommendations to the Senate Committee on Governmental Affairs and the House Committee on Government Operations not later than 60 days after the date of this report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

Copies of this report are being sent to the Chairmen, House Committee on Government Operations, Senate Committee on Governmental Affairs, and House and Senate Committees on Appropriations; the Director, Office of Management and Budget; the Administrator, Office of Information and Regulatory Affairs, OMB; the Administrator, Office of Job Corps; and other interested parties.

Sincerely yours,

  
Gregory V. Ahart  
Director

UNAPPROVED DEPARTMENT OF LABOR  
REPORTING AND RECORDKEEPING REQUIREMENTS  
USED IN JOB CORPS PROGRAM

Specifically Listed in Job Corps Contracts

<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
RIMS #1	Monthly Narrative Report (narrative status report)	monthly
RIMS #2	Job Corps Performance Measurement Report (measurement report)	monthly
RIMS #3a	Center Corpsmember Status Report Log (status report)	monthly
RIMS #3b	ACT Corpsmember Status Report Log (status report)	monthly
RIMS #4	Disciplinary Proceedings Report (disciplinary report)	monthly
RIMS #5	Center Operations Report (operations report)	monthly
RIMS #6a	Center Input Report (input report)	weekly
RIMS #6b	Center Placement Report (placement report)	monthly
RIMS #6c	Corporate Hire of Corpsmember (status report)	quarterly
RIMS #12a	Construction and Rehabilitation and Vocational Student Training Needs Report/Plan (status report)	semi- annually
RIMS #12b	Equipment Needs and Training Fund Report (status report)	semi- annually
RIMS #12c	Rehabilitation and Training Summary (summary report)	quarterly
RIMS #13	Staff Training Plan (staff report)	annually
MA2-111	JCC/ACT Financial Status Report (status report)	monthly



<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
MA2-180	JCC/ACT Financial Analysis Report (financial report)	monthly
MA2-180a	JCC/ACT Financial Exceptions Report (financial report)	monthly
MA2-180b	JCC/ACT Applied Cost Budget (budget report)	annually
MA2-223a	Center Financial Report (financial report)	monthly
MA3-94	Contractor's Inventory Certifi- cation (certification report)	semi- annually
MA6-36	Inspection of Food Services Facilities (inspection report)	quarterly
MA6-37	Inspection of Lodging, Education- al, Recreational, and Other Facilities (inspection report)	quarterly
MA6-38	Inspection of Water Supply Facilities (inspection report)	quarterly
MA6-39	Inspection of Waste Water Treat- ment Facilities (inspection report)	quarterly
No number	Salary Schedules Formats I and II (salary report)	quarterly
No number	Critical Medical Situations and Death (medical report)	quarterly
No number	Serious Incidents and Corpsmembers Arrests (serious incident report)	quarterly
MA5-150	Status of Vocational Training Report (status report)	semi- annually
<u>Additional DOL Requirements</u>		
MA6-40	Job Corps Corpsmember Profile (profile report)	when needed
MA6-61	Job Corps Notice of Termination (termination report)	when needed
MA6-97	Resume of Corpsmember's Qua- lifications (recordkeeping requirement)	when needed

## APPENDIX

## APPENDIX

<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
MA6-98	Corpsmember Mobility Statement (application)	when needed
MA6-131	Packet Information for Disci- plinary Discharge Cases (recordkeeping requirement)	when needed
MA6-131c	Packet Information for Disci- plinary Discharge Cases (recordkeeping requirement)	when needed
Job Corps Notice No. 81-10	Safety and Occupational Health Program for Job Corpsmembers (safety and health report)	quarterly
Job Corps Notice No. 81-50	Samples of Documents Used In Selection and Processing of Vocational Education Interns (recommendation form)	when needed
Job Corps Notice No. 81-53	Job Corps Recruitment, Screening, and Placement Plan for Fiscal Year 1982 (status form)	when requested
Job Corps Notice No. 81-59	ETA Responsibilities in DOL Incident Report Procedures and Other ETA Activities Covered by Memorandums of Agreement with the Office of Inspector General (OIG) (incident report)	when needed
Job Corps Bulletin No. 80-20	Quarterly Energy Reports for Job Corps Centers (status report)	monthly & quarterly
Job Corps Bulletin No. 80-25	Audit Resolutions and Contract Closeout Corrective Action Plans (status form)	monthly
Job Corps Bulletin No. 80-34	Incident Reporting Require- ments (incident report)	when needed

## APPENDIX

## APPENDIX

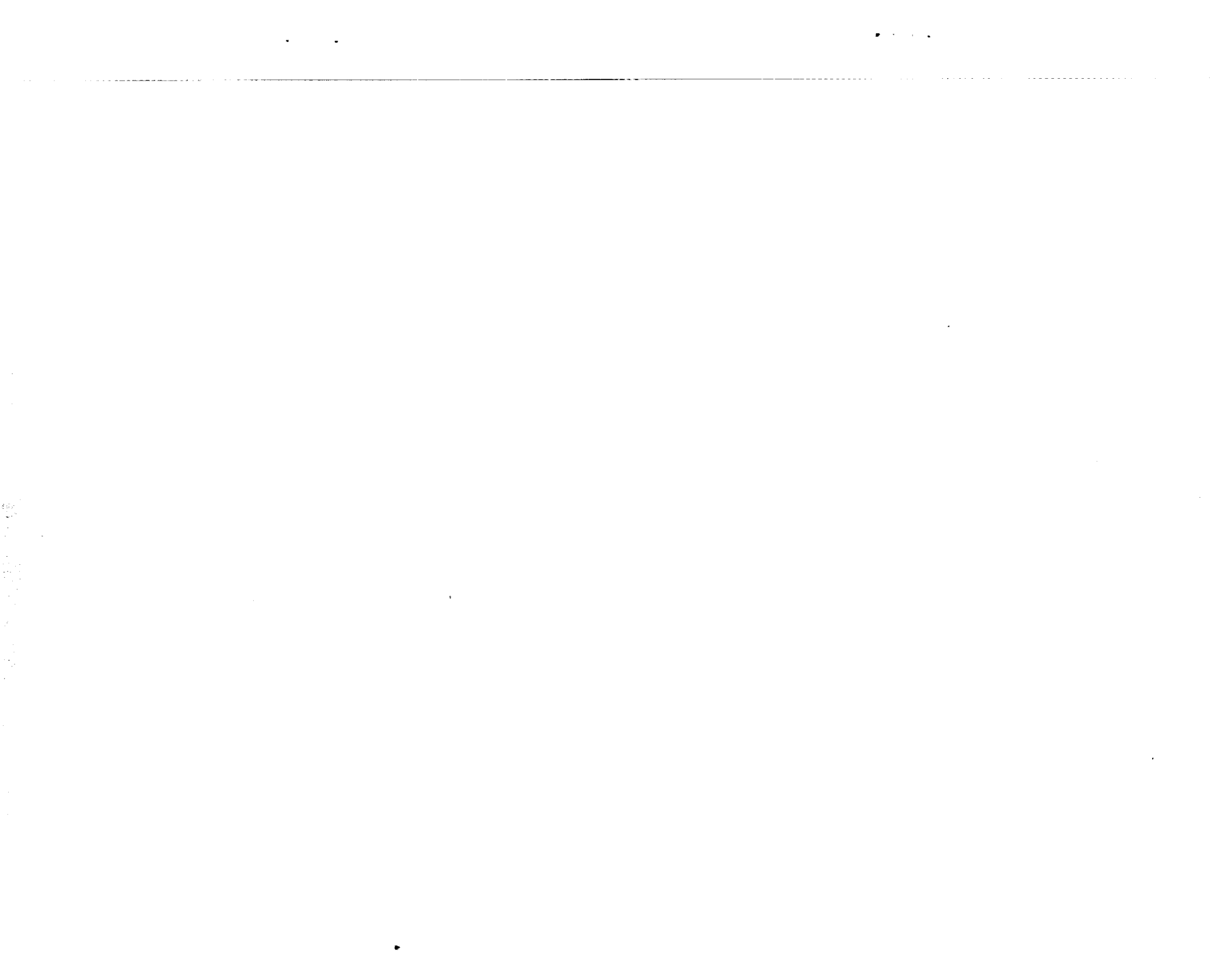
<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
Job Corps Bulletin No. 81-26	Prototype Subcontracts for Center Health Professionals (contract/agreement)	when needed
No number	Energy Consumption Report (energy report)	quarterly

REGIONAL FIELD INSTRUCTIONS

<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
Job Corps No. 44-74	Job Corps Policy and Procedures for Corpsmember Personnel Absences (recordkeeping requirement)	when requested
Job Corps No. 36-75	Guidelines for Selecting Candidates for the JC/BRAC Minneapolis/St. Paul Airline/Railroad Clerical Training Program and Actions Required by the Job Corps Centers (application/enrollment)	when needed
Job Corps No. 16-76	Guidelines for Operation of the Job Corps Entertainment Motion Picture Program (inventory form)	when needed
Job Corps No. 7-78	Advanced Career Training (ACT) Program (referral form)	monthly
Job Corps No. 21-79	Standardized Advanced Career Training (ACT) and Work Experience Program (WEP) Application/Referral Package (application/referral)	when needed
Job Corps No. 34-79	Advanced Culinary Program (application/background information)	when needed
Job Corps No. 37-79	Vocational Training Reports (status reports)	semi-annually
Job Corps No. 44-79	Safety Checklist for Welding (checklist/questionnaire)	when needed
Job Corps No. 3-81	Corpsmember Personnel Folders (recordkeeping requirement)	when needed
Job Corps No. 25-81	PSE Reemployment Effort (referral form)	when needed
Job Corps No. 26-81	Quarterly Energy Consumption Report (usage report)	quarterly
Job Corps No. 35-81	Timely Submission of Placement Packages and Placement Package Reports (transmittal reports)	weekly

REGION III ETA BULLETINS

<u>Form no.</u>	<u>Title</u>	<u>Frequency</u>
Job Corps No. 16-81	Comprehensive Health Services for Corpsmembers in the ACT Program (status report)	when requested
Job Corps No. 31-81	Health Management Information System (HMIS) Needs Assessment Survey (questionnaire)	when requested



23096

**AN EQUAL OPPORTUNITY EMPLOYER**

**UNITED STATES  
GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548**

**OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE, \$300**

**POSTAGE AND FEES PAID  
U. S. GENERAL ACCOUNTING OFFICE**



**THIRD CLASS**