

Comment on DOL Job Corps Placement and Assistance Record ICR

BEFORE THE UNITED STATES DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING ADMINISTRATION

**Agency Information Collection Activities; Comment Request
Job Corps Placement and Assistance Record
Federal Register Document 2026-17834
OMB Control No. 1205-0035**

Comment of The Scaffold Initiative

Submitted: September 29, 2026

I. Introduction and Interest of the Commenter

The Scaffold Initiative is a Wyoming-incorporated 501(c)(4) social welfare organization focused on workforce equity, community-based organization (CBO) capacity building, and the responsible integration of artificial intelligence into workforce development systems. Since our incorporation in March 2026, we have submitted public comments on Workforce Innovation and Opportunity Act (WIOA) state plan modifications across more than fifteen states, as well as comments to the Department of Labor on independent contractor classification, the Department of Housing and Urban Development on work requirements, and the Department of Education on workforce Pell Grant implementation. We bring a practitioner-oriented perspective grounded in the operational realities of CBOs that serve the populations Job Corps is designed to reach.

We appreciate the opportunity to comment on the proposed information collection renewal for the Job Corps Placement and Assistance Record (ETA Form 678, OMB Control No. 1205-0035). While we recognize the form's longstanding role in documenting post-separation outcomes for Job Corps participants, we believe this renewal presents a critical opportunity to modernize the data architecture of the placement record to reflect the realities of an AI-transformed labor market, an increasingly portable credentialing ecosystem, and the growing role of community-based organizations in workforce transitions.

We respectfully offer three specific recommendations for data field additions that would substantially improve the analytical value of ETA Form 678 without imposing significant additional burden on respondents.

II. Summary of Recommendations

1. **Add an automation exposure indicator linked to the placement occupation’s SOC code**, enabling the Department to track whether Job Corps graduates are entering occupations with high, medium, or low exposure to AI-driven displacement.
2. **Add a Credential Transparency Identifier (CTID) field** for credentials earned during training, linking placement records to the Credential Engine’s open registry and enabling portable, machine-readable credential tracking across workforce systems.
3. **Add a provider-type field distinguishing CBO-assisted placements from unassisted placements**, enabling the Department to measure and attribute the role of community-based organizations in post-separation outcomes.

III. Recommendation 1: Automation Exposure Tracking

The Problem

The current ETA Form 678 captures the Standard Occupational Classification (SOC) code associated with each placement. However, recording the SOC code alone provides no insight into the long-term viability of that placement in an economy undergoing rapid automation. The Bureau of Labor Statistics’ Employment Projections 2025–2035 projects that office and administrative support occupations will decline by 4.0 percent—the fastest pace among major groups—losing approximately 752,100 jobs over the decade, driven in part by AI integration into workflows. Production occupations are projected to decline by 0.4 percent as automated machinery displaces manual labor.

Job Corps serves young adults entering precisely these vulnerable occupational categories. If the Department cannot distinguish between a placement in a high-automation-risk occupation and one in a resilient sector, it cannot evaluate whether the program is preparing participants for durable careers or funneling them into roles that will be automated within a decade.

The Recommendation

We recommend that the Department add a derived data element to ETA Form 678 that appends an automation exposure category (high, medium, or low) to each placement based on its SOC code. This field could be populated automatically using publicly available occupation-level automation indices, such as:

- The **AI Occupational Exposure (AIOE)** index developed by Felten, Raj, and Seamans (2021), which maps AI capabilities to O*NET human abilities across all SOC codes
- The **BLS AI exposure indicators** introduced in the 2025–2035 Employment Projections
- The **Brookings Institution** automation analysis, which found that approximately 25 percent of U.S. employment faces high automation exposure (over 70 percent of task content at risk)

Because the field would be derived from the SOC code already collected on the form, the additional respondent burden would be zero. The analytical benefit would be substantial: the Department could evaluate whether Job Corps training tracks are steering participants toward resilient occupations, identify training programs that consistently produce high-risk placements, and adjust curricula accordingly.

Precedent

The Government Accountability Office (GAO/HEHS-99-15, November 1998) found that Job Corps overstated vocational training performance, reporting that 48 percent of participants completed training when only 14 percent had satisfied all training requirements. The OIG subsequently found that 42.3 percent of 17,787 job training match placements were overstated (Report No. 26-11-004-03-370, September 2011). Adding automation exposure data would provide a forward-looking quality dimension to complement these backward-looking accuracy concerns, enabling the Department to evaluate not just whether placements occur, but whether they are sustainable.

IV. Recommendation 2: Credential Transparency Identifier (CTID)

The Problem

ETA Form 678 currently records credential information using unstructured text fields. When a Career Transition Services contractor records that a participant earned a “Welding Certificate” or “CNA,” there is no standardized way to determine the rigor, portability, or labor market value of that credential. A credential earned at one Job Corps center cannot be computationally compared to a credential earned at another, and participants who relocate across state lines have no machine-readable record linking their credential to a nationally recognized standard.

This limitation is particularly acute for Job Corps participants, who attend residential centers that may be located in different states from where they ultimately seek employment. Credential portability is not an abstract concern for this population—it is an immediate, practical barrier to placement durability.

The Recommendation

We recommend that the Department add a field for the **Credential Transparency Identifier (CTID)** to ETA Form 678. The CTID is a globally unique identifier (formatted as **ce-** followed by a UUID) assigned to credentials published in the Credential Engine’s Credential Registry. The registry currently catalogs credentials from thousands of organizations using the Credential Transparency Description Language (CTDL), an open schema that describes credential requirements, competencies, issuing organizations, and target occupations as linked data.

By recording the CTID alongside each credential earned, ETA Form 678 would:

- Enable automated verification of credential details through the Credential Registry API
- Link credentials to their target occupations using CTDL’s **preparesForOccupation** property, providing an objective basis for determining whether a placement is “training-related” rather than relying on center-level staff judgment
- Support interoperability with state workforce systems, Learning and Employment Records (LERs), and other WIOA core programs that are adopting CTDL
- Allow longitudinal analysis of which specific credentials produce the strongest placement outcomes across centers

Implementation would require Job Corps to map its training offerings to CTDL entries in the Credential Registry—a one-time cataloging effort that Credential Engine actively supports through its publishing tools. Once mapped, the CTID field would reduce respondent burden by replacing free-text credential descriptions with a single structured identifier.

Precedent

The OIG found in 2018 that Job Corps “could not demonstrate beneficial job training outcomes” because contractors did not systematically document the relationship between training and employment (Report No. 04-18-001-03-370, March 2018). Embedding CTDL-based credential identifiers would directly address this finding by anchoring training-placement relationships in standardized, machine-readable credential-occupation mappings rather than subjective contractor assessments.

V. Recommendation 3: CBO Attribution Field

The Problem

Community-based organizations play a critical but invisible role in Job Corps placement and transition services. CBOs serve as subcontracted Career Transition Services providers, informal referral networks, and wrap-around support systems for graduates navigating housing, transportation, childcare, and other barriers to employment retention. Under the Job Corps Policy and Requirements Handbook (PRH Chapter 4), graduates are entitled to up to 12 months of Career Transition Services following separation. In practice, much of this support is delivered through CBOs with deep local ties and employer networks.

Yet ETA Form 678 contains no field distinguishing whether a placement was achieved through CBO-assisted transition services, direct center placement, or participant self-placement. This omission makes it impossible to measure CBO effectiveness, to allocate resources toward high-performing transition partnerships, or to justify CBO funding in future program designs.

The Recommendation

We recommend that the Department add a **provider-type indicator** to ETA Form 678 with a small enumeration of placement channel categories, such as:

Code	Description
1	CBO-assisted placement
2	Center/CTS contractor direct placement
3	Participant self-placement
4	Employer direct hire

This single field would enable the Department to:

- Measure the marginal impact of CBO involvement on placement rates, retention, and wage outcomes
- Identify geographic areas where CBO partnerships produce stronger outcomes
- Inform future WIOA state plan resource allocation by providing evidence of CBO effectiveness
- Address the survivorship bias inherent in current placement tracking, where participants who succeed without CBO support may be systematically different from those who require it

The additional respondent burden would be minimal—a single selection from a short dropdown—and the analytical return would be disproportionately large.

VI. Supporting Context: WIOA Alignment and Administrative Data Matching

We note that the data architecture limitations of ETA Form 678 extend beyond the three specific recommendations above. The WIOA Participant Individual Record Layout (PIRL) requires data elements—including quarter-specific employment indicators (PIRL elements 1600–1606), measurable skill gains (PIRL elements 1806–1810), co-enrollment tracking (PIRL elements 214–215), and detailed barrier-to-employment variables—that ETA Form 678 does not natively capture. While we recognize that aligning the placement record with the full PIRL schema may exceed the scope of this renewal, we encourage the Department to consider these alignment gaps in future form revisions.

We also encourage the Department to accelerate the transition from self-reported placement data to administrative wage record matching through the State Wage Interchange System (SWIS) and the National Directory of New Hires (NDNH). Federal workforce programs including Trade Adjustment Assistance and SNAP Employment and Training already use administrative data matching for outcome verification. Extending this practice to Job Corps would address longstanding concerns about contractor-reported placement data integrity documented by both the GAO and OIG over the past two decades, while reducing the manual burden on Career Transition Services staff.

VII. Conclusion

The Job Corps Placement and Assistance Record is more than an administrative form—it is the instrument that determines what the Department can learn about the effectiveness of its largest youth workforce investment. The data fields chosen in this renewal will define the boundaries of future program evaluation for years to come.

We urge the Department to seize this renewal as an opportunity to add three modest, low-burden data elements—an automation exposure indicator, a credential transparency identifier, and a CBO attribution field—that would substantially modernize the analytical capacity of the placement record. These additions would enable the Department to answer questions that the current form cannot: Are we placing participants in durable careers? Are the credentials we fund recognized beyond the center that issued them? Are community partners making a measurable difference?

The Scaffold Initiative stands ready to provide additional technical input or to collaborate on implementation approaches for any of these recommendations.

Respectfully submitted,

Ricky Tucker
Executive Director
The Scaffold Initiative
c/o Northwest Registered Agent LLC
30 N Gould Street, Suite N
Sheridan, WY 82801
policy@thescaffoldinitiative.org

AI Disclosure: This comment was prepared with the assistance of Claude (Anthropic), which was used for research synthesis, drafting, and citation verification. All substantive positions, recommendations, and strategic judgments are those of The Scaffold Initiative. Federal data sources cited include the Government Accountability Office, DOL Office of Inspector General, Bureau of Labor Statistics, and Credential Engine.