



March 19, 2012

Ms. Karen Staha
Office of Policy Development and Research
Employment and Training Administration
United States Department of Labor
200 Constitution Avenue NW, Room N-5641
Washington, DC 20210

Ms. Staha:

On behalf of the Workforce Development Agency, State of Michigan (WDASOM), I wish to submit the following comments in response to the January 18, 2012, Federal Register Notice entitled *Comment Request for Information Collection for a Three-Year Extension of the Labor Exchange Reporting System (LERS), Extension With Revisions*.

1. The proposed revisions add the fields "Three Month Median Earnings" and "Six Month Median Earnings" to the ETA 9002 D and the VETS-200 A reports. Why is the addition of these fields necessary from a data collection perspective? How will the data be used? Since data is already reported on average earnings, reporting data on median earnings seems unnecessary.
2. The proposed revisions add the field "Received Credential" to the ETA 9002 D and the VETS-200 A reports. How is credential defined in this case? Is the Common Measures definition of credential the one being used? We would be supportive of using the Common Measures definition.
3. For the ETA 9002 A, 9002 B, 9002 D, and the VETS-200 A reports, would it be possible to further break down the 18-44 age category to make the data more useful? Perhaps an 18-24 age category can be added to all affected reports? We know this segment of the population is experiencing significant unemployment and would like to better tailor services to meet their unique needs.

Thank you for your consideration of these questions and comments. Should you require additional information or have questions, please contact me at EstlundOlsonL@michigan.gov or at 517-335-1061.

Sincerely,

A handwritten signature in cursive script that reads "Liza Estlund Olson".

Liza Estlund Olson, Director
Direct Talent Strategies
Workforce Development Agency, State of Michigan



Workforce Development Agency, State of Michigan

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