

**EMPLOYMENT SECURITY
DIVISION**

Workforce Investment
Support Services



BRIAN SANDOVAL
Governor

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February 24, 2014

Karen Staha
Office of Policy Development and Research
U.S. Department of Labor/ETA
200 Constitution Avenue NW Room N-5641
Washington, DC 20210

RE: 77718 Federal Register Notice Comments Vol. 78, No. 247

Dear Ms. Staha:

Nevada's comments for Information Collection for Data Validation Requirements of Employment and Training Programs; Extension without Revisions follow:

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;

The new WIASRD in particular has 57 new elements and 17 new dates with edit checks and new rejects surrounding these items that previously were yes/no values. This resulted in much more work for the states both in programming the changes and challenges of date edit checks, research, analysis and correction to complete submissions. This will add even greater difficulty with Data Element Validation (DEV) system, file review and submission.

Nevada's experience with the new EDRVS system and new Data Element process has proved more time consuming. Nevada experienced the processes using EDRVS with the TAPR and Labor Exchange Data Element Validation which samples are much smaller in comparison to WIA DEV.

Nevada estimates the process taking at least four times as long due to locating and entering codes rather than just noting Pass or Fail on the worksheets, data entry into EDRVS and hands on file and system validation. Completing the 25 Labor Exchange validation samples was estimated at 10 hours each for four staff totaling 40 hour's work. WIA DEV samples being 25 times the sample size equates to 1000 hours and will require more staff. The hands on file review is required on location at multiple providers which took 352 hours required to complete the on-site file reviews and data entry of those results using the existing DRVS system.

In regards to enhancing the quality, utility and clarity of the information collected, DOL would have to advise the states how this new process enhances the quality, clarity and utility of collected information.

Nevada found the new system EDRVS and the new DOL DEV process to be a much greater burden then the previous software and processes. Hopefully the new software will be better maintained, which should result in less technical issues than its predecessor.

Nevada feels the extra time required entering code values and review time outweighs the utility needs of the Department of Labor, particularly if the sample size is not going to be reduced in the new EDRVS system. Should the Department of Labor consider reducing the sample sizes for WIA DEV, the burden for the states could be reduced.

Sincerely,



Renee L. Olson
Administrator

cc: Frank R. Woodbeck, Director, DETR
Dennis Perea, Deputy Director, DETR
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