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February 24, 2014

E-mailed: 2/24/14 (cg)

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

Dear Ms. Staha:

In response to the U.S. Department of Labor (USDOL) comment request for information collection for the Data Validation (DV) requirement for employment and training programs; extension without revisions, the Workforce Investment Act (WIA), Trade Adjustment Assistance (TAA), and Management of Information System (MIS) sections of the Workforce Development Agency, State of Michigan respectfully submit the following comments.

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.

*WIA Response:* Each element currently requiring data collection has been reviewed and is believed to directly relate to performance, eligibility, and/or outcomes. No issues to report.

*TAA Response:* The TAA elements have practical utility; however, source documentation options are unclear, particularly Petition Number and the Waiver from Training Requirement.

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.

USDOL lists these estimates at:

*Average Time per Response:* 218 hours.

*Estimated Total Annual Burden Hours:* 62,174.

*Total Additional Annual Burden Cost for Respondents:* \$0.

*Total Estimated Additional Annual Other Costs Burden:* \$0;

*WIA/MIS Response:* Estimates of staff time required for WIA DV greatly exceed the estimated average time per response given by USDOL. Program staff estimates that Michigan spends a minimum of 792 hours on WIA DV each year. Additional burden costs for respondents total thousands of dollars due to staff travel required to conduct on-site reviews and technical assistance training.

*TAA Response:* No issues with reported hours



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

*WIA Response:* The source documentation list should be reviewed and revised to include additional tools, such as Equifax for validation of employment at participation and during follow-up, and the addition of best practices for states that struggle with elements such as public assistance recipient data collection, enrollment in education, and credential validity.

*TAA Response:* The source documentation options for Petition Number and Waiver from Training Requirement should be reviewed and modified to provide clear guidance. The guidance provided, when asked for clarification, does not appear to coincide with the official guidance.

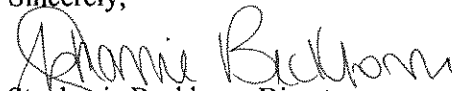
Minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

*WIA/TAA Response:* Permission to review scanned files in-house would greatly decrease the burden on state resources, such as staff travel time and related funding, allowing for greater efficiency in these areas.

*MIS Response:* The new Enterprise Data Reporting and Validation System (EDRVS) lacks printable worksheets for the individual participants selected for DV. DV reviewers need such worksheets in order to know which fields are being validated for each file. The validated elements change from file to file and without individual printable worksheets, there is no way for reviewers in the field to know what is being validated. Additionally, new EDRVS system lacks summary and analytical reports by local area. While there are statewide reports available, the system does not have reports by local area, which then must be manually created by state staff. Last, the new EDRVS system requires that a specific value be entered instead of a pass or fail that was entered on the old system. This has greatly increased the amount of time needed for data entry.

Please contact Ms. Stephanie Beckhorn, Director, Office of Workforce Policy and Strategic Planning, at (517) 241-4078, or by e-mail at [beckhorns@michigan.gov](mailto:beckhorns@michigan.gov), with questions.

Sincerely,



Stephanie Beckhorn, Director  
Office Workforce Policy and Strategic Planning

SB:CM:cg

cc: Stephanie Beckhorn  
Joe Billig  
Jackie Gaters  
Krista Johnson  
Tammy Flynn  
Chelsea L. Mates