
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

August 4, 2016

Office of Information and Regulatory Affairs
Attn: OMB Desk Office for DOL-ETA
Office of Management and Budget, Room 10235
725 17th St., NW
Washington, DC 20503

Submitted via email: OIRA_submission@omb.eop.gov , cc DOL_PRA_PUBLIC@dol.gov

To whom it may concern,

I am pleased to provide comments on the Trade Activity Participation Report (TAPR) information collection request (ICR) submitted by the Office of the Secretary of Labor to the Office of Management and Budget (OMB), as described in the *Federal Register* on July 7, 2016 (OMB Control Number: 1205-0392).

As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that promote U.S. economic competitiveness and job creation. In addition, I serve on the Secretary Perez's [Workforce Information Advisory Council](#) (WIAC) as the representative of research entities. From these perspectives, I find the TAPR to be essential for creating a comprehensive, accurate database of participants in the Trade Adjustment Assistance (TAA) program sponsored by the Employment and Training Administration (ETA). I commend ETA staff for the thoroughness and clarity of their work.

In order to complete TAPR Section D (Program Outcomes Information) for every TAA participant, each state must obtain the unemployment insurance (UI) wage records of any participant who moved out of state within four quarters of the exit quarter. ETA operates the [Wage Record Interchange Program](#) (WRIS) to facilitate this process.

However, the Supporting Statement does not indicate the data collection burden on states for participating in WRIS or the percentage of TAPRs that are incomplete due to gaps in the WRIS process.

So that OMB and stakeholders in the TAA Program can have a more complete understanding of any issues in the TAPR reporting process and how ETA might best address them, I suggest that as a condition of clearance for approving the TAPR ICR, OMB direct ETA to publish a report indicating:

- 1) the percentage of TAPRs, by year, that are incomplete due to inaccessibility of out-of-state records,
- 2) that portion of projected state data collection burden due to participation in WRIS, and

- 3) expected ETA efforts to reduce the number of incomplete TAPRs and state burden for collecting Section D data for TAA participants who have moved out of state.

I appreciate the opportunity to comment on the TAPR ICR and hope you find my thoughts helpful.

Sincerely,

A handwritten signature in black ink that reads "Andrew Reamer". The signature is written in a cursive, flowing style.

Andrew Reamer
Research Professor