

Iowa **WORKFORCE** Development

January 20, 2022

TO: Ms. LaMia Chapman, DOL-ETA (ICR Point of Contact)

FROM: Ms. Christina Steen, IWD Division Administrator, Unemployment Insurance Division

ICR: "Federal Pell Grants and the Payment of Unemployment Benefits to Individuals in Approved Training"

RE: Formal Submission of Agency Response Comments, DOL-ETA 1205-ONEW

On behalf of the State of Iowa's Iowa WORKFORCE Development (IWD), we are pleased to submit for agency review and consideration, a series of comments and questions related to your posted DOL-ETA ICR, with OMB Control Number 1205-ONEW.

We ask that this comment package be formally included in your collected agency responses for this ICR.

After considering the narrative of your ICR Purpose Statement, I find myself with a series of overall comments, in the form of both comments and questions regarding certain applicable scenarios related to this ICR's theme and intended usage. Before we as an agency and program could formally endorse the use and mandate of this particular letter to our State of Iowa UI claimants, we would need to ascertain several pieces of needed information first, *which are at present unknown, or unclear*.

First, is it the intention of DOL-ETA under this ICR to provide administrative funding for the production and needed services of the letter, with the associated costs of printing, mailing, and postage for the external distribution out to UI claimants?

Secondly, States will need and should therefore receive a formal guidance statement that will indicate to whom the letter should specifically be sent to, and under what circumstances. Is this envisioned under the operational aspects of this ICR?

Thirdly, it is still unclear as to which government entity will have *formal* responsibility for updating this letter template. Additionally, will DOL-ETA inform States as to what time-frame their respective agency's should be sending out this new UI benefit communication?

And we as a bona-fide department and agency of the State of Iowa have certain fixed communication requirements for content, distribution, and standardization of approved departmental materials, and very often we must take these external requests, letter templates, and informational handouts and translate these into approved formats for the legal distribution of these materials. Will there be an ability on behalf of IWD to modify content, wording, and/or format to ensure alignment with the State of Iowa's communication requirements?

Lastly, can IWD list only colleges, universities, and related training programs that PHYSICALLY RESIDE in our state, or can we also list programs and training in contiguous border areas or neighboring states where we maintain active training partnerships?

We are pleased to provide this collection of related ICR-based comments and questions for the public record. Additionally, we thank DOL-ETA for their leadership in the manner that you work with your State-based partners. We are appreciative of your work and consideration under this specific ICR.