



March 23, 2022

The National Association of State Workforce Agencies (NASWA) appreciates the opportunity to comment on the proposed extension of the USDOL Resource Justification Model (RJM), as requested by the U. S. Department of Labor (DOL) in the Federal Register Vol. 87, No. 38 / Friday, February 25, 2022.

NASWA is a non-profit organization of state administrators of unemployment insurance laws, employment services, training programs, employment statistics and labor market information and other programs and services provided through the publicly funded state workforce system.

NASWA provides a forum for states to exchange information and ideas on how to improve program operations; serve as a liaison between state workforce agencies and federal government agencies, the Congress, other intergovernmental groups; and serve as the collective voice of state agencies on workforce policies, unemployment insurance and related issues.

Comments submitted for the Department of Labor, Employment and Training Administration sponsored information collection request (ICR) to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995.

NASWA's Comments follow:

(1) Whether the collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility;

Response: NASWA believes at this time the continued collection of RJM information is necessary for the proper performance of the functions of the Department. However, this now 20+ year old system needs to be reviewed and modernized to more effectively represent the true cost to the states for operation of the Unemployment Insurance (UI) program.

Note: As long as the Federal appropriations process continues to critically underfund the total amount of state UI administration needs, as shown by continued state estimates of costs through RJM submissions of at least a 20 percent shortfall in required administrative funds, adjustments to the RJM, while slightly improving the allocation process, will not solve the States' lack of necessary funds.

(2) if the information will be processed and used in a timely manner;

Response: No comment, no issue

(3) the accuracy of the agency's estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used;

Response: While the data is essentially accurate, the cost to maintain knowledgeable staff who understand the complexities of the RJM data collection and submission process at the state level varies widely among states. Increased staff turnover often results in loss of RJM expertise causing states to look for alternatives including consultants to fulfill this program requirement.

(4) ways to enhance the quality, utility and clarity of the information collection; and

Response: States report the RJM process is overly complex and difficult to fully comprehend. States are concerned on how equitable the model is as more knowledgeable States are able to optimize their RJM submissions (gaining a larger relative share of limited resources) relative to other less knowledgeable states.

(5) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

Response: The complexity of the RJM process requires very detailed administrative cost and workload tracking by the states. Other programs utilize simpler methodologies to allocate limited funds appropriated by Congress equitably among States.

Questions on this submittal may be directed to Jim Van Erden at: jvanerden@naswa.org