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Sent: Monday, January 8, 2024 3:21 PM
To: BLS_PRA_Public <BLS_PRA_Public@bls.gov>
Subject: Comments on Federal Register Notice - OH

Good afternoon

Ohio has some comments to add for review by the BLS:

1. The funding attached to the BLS-LMI Cooperative Agreement is insufficient to conduct the activities prescribed by the agreement.
 - a. State employee costs continue to rise, while funding is flat or decreasing each year.
 - b. The funding formula includes provisions for a minimum number of base positions.
 - i. This results in small states being overfunded for each cooperative program, while large states are left with a much smaller pie with which to conduct business. Not all programs require a full position.
2. The 4-quarter cycle through which funds are awarded to states is insufficient for planning purposes.
 - a. Some states are only able to provide quarterly reporting, as opposed to monthly reporting, and are given variances to reflect this.
 - i. Trying to precisely spend down four individual grants in a 12-month period, while only being able to analyze spending quarterly, is very difficult.
 1. If funds were awarded as a block grant for the four programs, states will be able to precisely hit spending targets.
 2. If states were allowed an extra quarter to allocate resources appropriately (5-quarter grant period), they can more efficiently spend these grants, and potentially avoid lapsing funds.
3. The transition to Grant Solutions has been very difficult for the states, largely due to the lack of communication and training provide to and by the BLS regional offices.
 - a. Before states would be willing to transition any further toward a paperless world, the failures of the transition to Grant Solutions need to be addressed, fixed, and then highlighted as an example of how to avoid doing things in the future.

Thank you!



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