

April 6, 2011

Employment Department

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Carol Rowan, BLS Clearance Officer Division of Management Systems Bureau of Labor Statistics, Room 4080 2 Massachusetts Avenue, NE Washington, DC 20212

Re. QCEW Clearance, Federal Register

Dear Ms. Rowan,

On behalf of the State of Oregon, we would like to provide the following comments on the above clearance consultation.

- 1. We agree with the Bureau's statements regarding the importance of the Quarterly Census of Employment and Wages (QCEW) program.
- 2. Regrettably, the Bureau's statements focus almost exclusively on the importance of these data to federal statistical programs. But the QCEW program is at least equally important to State-level economists and analysts, as well as to State-level end customers. QCEW data are used by a variety of key State customers, including private sector businesses, elected officials, and state and local government agencies. These data are particularly important for purposes including planning and performance measurement, as well as providing the most detailed records of employment by geographic area.
- 3. The Bureau's statements focus primarily on the "national, State, MSA, and county levels." In addition, the QCEW data form the foundation for sub-county analyses using geo-coded data and geographic information systems.
- 4. For all these reasons, both federal and State, it is indeed essential that the QCEW data are accurate and timely.
- 5. We also wish to emphasize the importance and value of the States' role in this program. The quality of these QCEW data relies heavily on the work of State employees who add value by applying local knowledge to improve and enhance the data, processing large amounts of data in a timely manner. BLS plays an important role in this program, providing national leadership and helping ensure that the States are operating with consistent approaches, quality standards, and expectations. The States, in turn, provide local expertise about individual companies, state UI programs, economic trends without which the quality of QCEW data would be significantly reduced.

Sincerely,

Graham Slater, Administrator

Workforce and Economic Research Division