



Employment Security Department

WASHINGTON STATE

March 19, 2012

Karen Staha,
Office of Policy Development and Research
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW, Room N-5641
Washington, DC 20210

Dear Ms. Staha:

This letter is in response to the invitation for comment regarding a three-year extension and revision of the Labor Exchange Reporting System (LERS).

Let me first emphasize that the Washington State Employment Security Department (ESD) supports the collection of data to evaluate the performance and delivery of labor exchange and employment services within the One-Stop delivery system.

ESD would like to raise one concern. It is important to Washington that we continue to have immediate access to the state's ETA 9002 and VETS 200 reports. We need to retain the ability that the current reporting system allows for states to:

- Analyze performance results for accuracy prior to submission to the U.S. Department of Labor; and
- Aggregate common measures data at a local area-level consistent with state-level reporting.

We greatly appreciate your consideration of this concern.

If you need additional information, please contact me at 360-725-9475 or agoranson@esd.wa.gov.

Sincerely,

Anne Goranson

Anne Goranson
Assistant Commissioner, WorkSource Standards and Integration Division
Washington State Employment Security Department