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March 16, 2012

Karen Staha  
Office of Policy Development and Research  
U.S. Department of Labor/ETA  
200 Constitution Avenue N.W.  
Room N-5641  
Washington, DC 20210

**RE: Comments Concerning LERS Control No. 1205-0240**

Please accept Nevada's comments as requested in the Federal Register/Vol. 77, No 11 "Comment Request for Information Collection for a Three-Year Extension of the Labor Exchange Reporting System (LERS), Extension with Revisions".

The proposed continued collection of proper performance currently has practical utility. Hopefully the new proposed enhancements will provide the states the ability to create, forecast, and analyze employment and veteran services with greater flexibility.

The rollout of the new DRVS report generation and submission in Nevada's opinion does not reduce the burden of reporting. Nevada uses CM-DART which automatically tabulates the aggregate numbers and performance outcomes. The EBSS files used for submitting 9002 and VETS reports are also automatically generated using this tool. Nevada spent 20-24 hours of programming staff time correcting the PY10 annual LX DRVS file in order to load the file and pass the DRVS edit check rejects and warning thresholds. Since DRVS submission is going to be required quarterly, Nevada estimates about 96 hours of programming time annually to prepare the file and submit the DRVS Labor Exchange files quarterly. Therefore, the minimization of the burden of collecting the information and submitting the reports is also not valid.

The current data collection system will need revisions encompassing additional program entries. These additions are necessary in order to facilitate the collection of new required data. These new entries would be required to effectively distinguish and track the program performance of different service eras and Veteran periods of service. A clear definition of the additional aspects of their outcomes will need to be defined ensuring the effective collection of the required data.

Nevada requires a clear definition of the "Targeted services they received, and additional aspects of their outcomes in order to monitor and oversee their effectiveness" as stated in the announcement in Section one, page 2567 first column, last paragraph.



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While the LERS system has been in place for a number of years, the requirement to collect the following new data places an economic burden on the State of Nevada, as well as the other 53 reporting agencies.

The first pertains to the priority of service provisions contained in the Jobs for Veterans Act, Public Law 107-288. No current mechanism exists to distinguish how the priority of service is applied. As an example, if a Veteran is referred to a qualified training program, how could it be documented to show the Veteran received priority of service over a non-Veteran in the training program? The same applies to documenting priority of service in the local one-stop offices. Priority is always given, but the current reporting mechanisms built into the system have no way to document that data.

Additional items are required under Public Law 112-56, Title II, VOW to Hire Heroes, Sections 238 and 239, and pertain to: (1) Performance measures on job counseling, training and placement programs of the department, and; (2) Clarifications of priority of service for Veterans in departmental job training programs. A new VOW program designator in the state data collection system will be required to facilitate effective tracking of the above requirements.

The new programs require the collection of additional information on groups of Veterans (such as Post 9/11 era Veterans), targeted services they received, and additional aspects of their outcomes in order to monitor and oversee their effectiveness. New methods and program modifiers will be required to distinguish the distinct and required multiple eras in which the Veterans served. This is required to effectively distinguish and track the program performance of different service eras. A clear definition of the additional aspects of their outcomes will need to be clearly defined to insure the effective collection of the required data.

All three of the above concerns will necessitate programming changes to the state data intake system. These programming changes will be necessary to collect the data as mandated in Public Law 112-56, Title II, VOW to Hire Heroes, Sections 238 and 239.

The changes needed for the additional new Veterans elements and the new DRVS file will require state MIS system enhancements and 9002 and VETS 200 reporting enhancements. The developers of the state's MIS system have given a rough estimate of 240 hours for these updates. Therefore, the annual burden cost for respondents estimated by ETA of zero is not valid.

Creating the individual files and submitting the information is currently the portion of the report that takes the greatest amount of state staff time. State performance reporting will also have to be changed in order to track federal performance. The staff required to produce these new files and enhancements are software developers and IT professionals. Changes for state program reporting are estimated at approximately 200 hours.

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All of the above changes will result in costs to the states. The burden of collecting the information will require Nevada programming staff to make data file corrections on a quarterly basis after the new system enhancements are completed. Therefore, the minimization of the burden of collecting the information and submitting the reports is also not valid.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Renee L. Olson', with a long horizontal flourish extending to the right.

Renee L. Olson  
Administrator  
Employment Security Division

RLO:lp

Attachment

cc: Frank R. Woodbeck, Director DETR  
Dennis Perea, Deputy Director, DETR  
Lynda Parven, Deputy Administrator, ESD/DETR  
Grant Nielson, Chief WISS/ESD/DETR  
Ron Fletcher, ESD Manager IV-South, ESD/DETR  
Susie Giurlani, Bus Process Analyst II, WISS/ESD/DETR  
Kim Morigeau, ESD Program Specialist III, WISS/ESD/DETR  
Roy Brown, State Veterans' Program Coordinator, ESD/DETR