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Karin Brownlee, Secretary

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Carol Rowan
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Bureau of Labor Statistics
Room 4080, 2 Massachusetts Avenue, NE.,
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Re: Response to the Department of Labor's, Bureau of Labor Statistics proposed collection, comment Request.

Miss Carol Rowan,

In reading the email from NASWA, BLS is looking for comments to improve the automated data collection methods for the Current Employment Statistics (CES) program. The desired improvement includes reducing respondent burden and enhancing the quality of information.

With the deployment of the new CES software, ACESweb, BLS assumed responsibility of the CES estimation process in March 2011 and made some changes to its data collection relying extensively on information technology. These changes will slightly increase the burden on employers. But overall the collection methods seem the same as the method of collection that has been used in the past. The collection method is not a problem. It does seem as though data "keying" errors are not caught and can really mislead the estimates in either direction. Also, some recent months have shown that not even half of the reporters are in for preliminary estimates, leading to inaccurate published estimates.

We do however have a couple questions regarding accuracy enhancement.

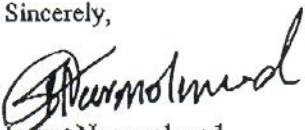
First, we have concerns knowing that "the link-relative estimating technique implicitly adjusts for nondependent's using the respondent's relationship of current to previous month's employment..." (Supporting Statement B, page 17). This seems to imply that no matter how small the portion of the sample in the cell is collected; the same estimate is applied for over-the-month growth. If so, this could cause biased estimates and large volatility when the response rate is low in a cell where the sample size not large. Being a small state this is a big concern. As data users, it would be helpful to receive a warning notice for a cell that receives a small portion of the sample for a month, for example 30%, so the risk is known while trying to interpret the data.

Second, it would be helpful for state analyst's to receive a notice when there is an update of CES samples for the state. For example, it was surprising to learn that there is a semi-annual update of sample for imputing birth/death business (Supporting Statement B, page 16). It was thought that this happened once a year in January. Knowing when such updates happen might help to understand unexpected monthly changes of employment.

Lastly it would be helpful if BLS provides monthly updated seasonal factors for state-wide industry employment, instead of calculating them on annual basis? The latter would not take account of the trend movement in recent months, and possibly result in misleading outcome of seasonally adjusted employment. An example of such case could be the estimate of government employment of Kansas in the beginning of 2011.

We would be glad to receive some explanation/instruction showing that our concerns are injudicious.

Sincerely,

 5/31/2011

Inayat Noormohmad
Kansas Director Labor Market Information Service
Kansas Department of Labor