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May 31, 2011

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

Re. CES Clearance, Federal Register: FR Doc.2011-7451

Dear Ms. Rowan,

We are writing in response to the proposed information collection request and request for comments published in the Federal Register on March 29, 2011, concerning the proposed revision of the "Report on Current Employment Statistics (CES)."

The National Association of State Workforce Agencies (NASWA) is concerned the recommended policy changes will result in diminished ability for state Labor Market Information (LMI) professionals to provide support to state and metropolitan areas to assist job seekers, local businesses, policymakers, and others.

State Labor Market Information (LMI) directors, as the recognized professional stewards of state and local labor market data production, dissemination, and other support services, may be unable to support the credibility of state and local estimates or provide an explanation of changes in the estimates produced from the recent change to automate the CES monthly survey and centralize the CES program.

Some reasons for this concern are:

- 1) data input errors and other anomalies are less likely to be discovered by state LMI offices;
- 2) state LMI professionals are less involved in or informed about updates to CES samples for the state; and
- 3) state LMI professionals are further removed from investigating and resolving erroneous data.

In addition, state analysts may have limited ability to inform policymakers on the effectiveness of programs that support reemployment and job creation activities, in addition to losing analytical capacity for strategic planning, decision making, performance measurement, research and evaluation.

Following extensive review and informational exchange with our members, NASWA believes this change may diminish the quality, clarity and the practical utility of the monthly CES figures, especially in smaller states and in substate areas.

On April 26, 2011, the Labor Market Information Committee discussed this topic with USDOL Bureau of Labor Statistics Commissioner Keith Hall. This discussion led Chair Maren Daley to submit a letter, dated May 9, 2011, to Commissioner Hall offering suggestions for consideration by the Bureau: First was a suggestion that the NASWA LMI Committee work with the Bureau to develop criteria for adjusting Current Employment Statistics results to address the shortcomings resulting from the relatively small sample size. Second was a suggestion to develop a certification process whereby state professionals have the authority to improve state level Current Employment Statistics results.

While FR Doc.2011-7451 represents changes already implemented, NASWA believes these two suggestions by Chair Daley will improve the quality of the statistical data at the state and local levels.

Thank you for considering NASWA's concerns.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Elsey". The signature is written in dark ink on a light-colored background.

Bonnie Elsey  
President, NASWA  
Senior Administrative Officer  
Minnesota Department of Employment &  
Economic Development