

EMPLOYMENT SECURITY
DIVISION

Office of the Administrator



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Governor

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Director

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November 14, 2012

Karen Staha
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RE: 592274 Federal Register Notice Comments Vol. 77, No. 187

Dear Ms. Staha:

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 WIA and veteran services with greater flexibility.

DOL has underestimated the agency's burden at zero. In Nevada, the state's MIS system must be updated to complete the reporting changes as well as the reporting capabilities. Nevada's MIS system, OSOS, currently has report data stored separately for WIA, Labor Exchange and Veteran reports and will need upgrading to report multiple programs in one combined report such as WISPR. In order for states to estimate an accurate burden of cost, data specifications for the new WIASRD file will be needed.

Nevada looks forward to reducing the burden of annual WIA reporting through elimination of the annual WIASRD. An appropriate automated technology for permitting submissions is also welcomed. Since WISPR was proposed three years ago and the undertaking proved to be too daunting, preparing states partially for conversion to WISPR could also benefit states.

Working towards WISPR in stages will not reduce the burden, but should reduce the scope of work required by states in each stage of implementation.

Sincerely,



Renee L. Olson
Administrator

cc: Frank R. Woodbeck, Director, DETR
Dennis Perea, Deputy Director, DETR
Lynda Parven, Deputy Administrator, ESD/DETR
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