



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Administration

DIVISION OF PERSONNEL AND LABOR RELATIONS

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Sent via email to: Chad_A._Lallemand@omb.eop.gov

February 5, 2015

Chad A. Lallemand
Office of Information and Regulatory Affairs
U.S. Office of Management and Budget
725 17th Street NW. Room 10235
New Executive Office Building
Washington, D.C. 20503

Subject: **Comments regarding proposed changes to the State and Local Government Report (EEO-4)**

Dear Mr. Lallemand,

Thank you for the opportunity to give comment on the U.S. Equal Employment Opportunity Commission's proposed change regarding the State and Local Government Report (EEO-4). (Reference: Federal Register/Vol. 80 No. 12.)

On behalf of the State of Alaska, in its capacity as a public employer, I applaud and support the gathering of consistent and meaningful data to further equal employment opportunities. Please know, however, the EEOC's projected cost and time burdens are grossly underestimated for the State of Alaska. As you may know, the State of Alaska is currently experiencing a significant budget shortfall. Moreover, our workforce exceeds 18,000 employees spanning across the Executive, Legislative, and Judicial branches of state government. We are, in fact, the state's largest employer.

The State of Alaska currently does not have the underlying technological infrastructure to capture expanded race and ethnicity data for our workforce. At this time, we are gathering a project team to determine how we will:

1) Efficiently resurvey our large workforce; and 2) Create the capacity to collect, store, and report on new expanded race and ethnicity categories in our applicant and employee computer systems.

Given the challenges in front of us, we request that the OMB and EEOC move the new mandate to become effect in 2019. We would greatly appreciate consideration of this matter.

If you have any questions or would like additional information, you are welcome to contact me or our EEO Program Manager Camille Brill at (907)375-7705. My direct telephone number is (907) 465-4403.

Sincerely,



Kate Sheehan
Director of Personnel & Labor Relations

Cc: Bernadette Wilson, Executive Officer
Executive Secretariat
U.S. Equal Employment Opportunity Commission
131 M Street NE
Washington, DC 20507