



Edmund G. Brown Jr.
Governor



April 30, 2015

Brian Pasternak, National Director of Temporary Programs
Office of Foreign Labor Certification
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW, Room C-4312
Washington, DC 20210

Ref: March 5, 2015, Federal Register Notice – Comments on Form ETA 9127

Dear Mr. Pasternak:

This correspondence provides comments concerning the collection of data using Form ETA-9127, *Foreign Labor Certification Quarterly Activity Report* (OMB Control Number 1205-0457), which expires May 31, 2015. The form ETA-9127 solicits information about program-related activities from State Workforce Agencies (SWAs) who are recipients of foreign labor certification grants.

Based on California's extensive foreign labor certification experience, we recommend the following additions to this reporting form:

- Include a line item to report the total number of Random Field Checks (RFCs) completed. We think this is important information that should be captured on this form.
- Add a Cumulative Count Column. We believe that having a cumulative count column will show if states are in line with meeting or exceeding their annual goals.
- Items #12 & 15 should include a "Yes/No" option to identify if a state performs this function. These items do not apply to California since we complete in-person inspections of all housing provided by its H-2A employers.

Thank you for the opportunity to provide comments on these form revisions. If you have questions or need additional information, please contact Roman Diaz by telephone at (916) 654-9315 or e-mail at roman.diaz@edd.ca.gov.

JOSÉ LUIS MÁRQUEZ
Chief, Workforce Services Division