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April 28, 2015

Mr. Thomas Stengle
Office of Unemployment Insurance
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Re: Comment Request for Information Collection for OMB 1205-0430, Resource
Justification Model Extension With Revisions

Dear Mr. Stengel,

The National Association of State Workforce Agencies (NASWA) appreciates the opportunity to comment on the proposed extension, with change for the Resource Justification Model (RJM), as requested by the U. S. Department of Labor (DOL) in the Federal Register / Vol. 80, No. 40 / Monday, March 2, 2015.

NASWA is a non-profit organization of state administrators of unemployment insurance laws, employment services, training programs, employment statistics and labor market information and other programs and services provided through the publicly-funded state workforce system.

NASWA provides a forum for states to exchange information and ideas about how to improve program operations; serve as a liaison between state workforce agencies and federal government agencies, the Congress, other intergovernmental groups; and serve as the collective voice of state agencies on workforce policies, unemployment insurance (UI) and related issues.

NASWA recently established an RJM workgroup that carefully reviewed the current RJM process and made a series of recommendations to improve the ability of the data collected to reflect changes in the business model states use to manage their UI system, including an ever increasing reliance on information technology. The NASWA workgroup was also interested in reducing state reporting burden wherever possible. The changes proposed by the Department of Labor are consistent with, and closely follow the recommendation of the workgroup.

NASWA notes that the Department of Labor is particularly interested in comments which:

- Evaluate whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

NASWA believes that the information collected through the RJM process is necessary for the proper performance of the UI program and provides a basis for an efficient distribution of UI administrative funds to states.

- Evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used;

NASWA believes that the estimate of burden hours displayed in the Federal Register Notice fairly represents the hours required to carry out the RJM process.

- Enhance the quality, utility, and clarity of the information to be collected; and

NASWA believes that the proposed changes better reflect the increase in the use of information technology to administer state UI programs is a positive change.

- Minimize the burden of the information collection on those who are to respond, including the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submissions of responses.

NASWA believes that the proposed changes will reduce the reporting burden.

Thanks you again for the opportunity to comment.

If you have any questions please contact Jim Van Erden at jvanerden@naswa.org.

Sincerely;



Scott B. Sanders
Executive Director
National Association of State Workforce Agencies