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Governor

STATE OF NEBRASKA

DEPARTMENT OF LABOR

John H. Albin, Commissioner
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April 29, 2015

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

RE: Federal Register Notice Vol. 80, No. 40 – Collection for OMB 1205-0430, Resource Justification Model (RJM); Extension With Revisions

Dear Mr. Stengle:

Nebraska is appreciative of the opportunity to comment on the Federal Register Notice regarding the Resource Justification Model (RJM). Our state is in a unique position in that staff from our agency participated on the original RJM workgroup as well as the most recent National Association of State Workforce Agencies (NASWA) RJM workgroup.

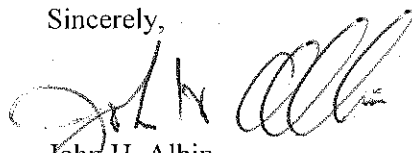
Initially the RJM transitioned from the Cost Model studies by continuing to capture actual expenditures with reduced burden. In addition, the RJM is completed annually so that all states are submitting current expenditure information. Since implementation in 2002 the RJM has collected data for budgeting in good economic times and downturns, handled reporting of specially funded programs and changes in state accounting systems. The RJM has proven to be a necessary data collection tool for the proper performance of the Unemployment Insurance (UI) program and input into the budget process.

The burden for preparing the RJM varies by state based upon state accounting systems and staff experience with UI that complete the RJM. The estimated burden hours accurately reflect the time necessary for a RJM trained staff person to complete the annual RJM document.

The proposed changes to the RJM reflects the changing needs of the UI program. The reduced level of detail is appreciated as we prepare the document. The increased costs to the UI program are focused around automation. It is important to have data to perform analysis and defend the budget resources necessary for operating the UI program. Discontinuing the hard copy note books is consistent with changes in other business processes. We support these changes to the RJM data collection.

Thank you for the opportunity to comment.

Sincerely,



John H. Albin
Commissioner of Labor