
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

August 7, 2015

Karen Staha
Office of Policy Development and Research
Room N-5641
Employment and Training Administration
U.S. Department of Labor
200 Constitution Ave., NW
Washington, DC 20210

Submitted via email: ETAPerforms@dol.gov

Dear Ms. Staha,

I am pleased to provide comments on the Employment and Training Administration's proposed renewal of the Labor Exchange Reporting System (LERS), as announced in the *Federal Register* on June 11, 2015. As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that promote competitiveness and innovation. From this perspective, I support ETA's intention to renew OMB clearance for LERS.

U.S. economic competitiveness depends on the capacity of the nation's labor markets to quickly connect employers seeking talent and workers seeking new employment. State labor exchanges are important mechanisms for facilitating these connections. LERS is critical for assessing the effectiveness of state labor exchanges and ascertaining ways their operations might be improved.

That said, I note that the *Federal Register* notice for LERS does not discuss recently legislated changes in the Wagner-Peyser Act (the controlling legislation for ETA's support and oversight of state labor exchanges) and the implications of these changes for LERS.

Specifically, the text of the June 11 notice is almost exactly the same as the text for that of January 18, 2012, the initial public notice for the prior renewal of LERS. As such, the June 11 notice puts LERS inside the framework of the Workforce Investment Act of 1998 (WIA) and doesn't mention that Congress repealed and replaced WIA with the Workforce Innovation and Opportunity Act of 2014 (WIOA).

WIOA section 307 amends Wagner-Peyser to specify performance accountability measures of state employment services: "Section 13(a) of the Wagner-Peyser Act (29 U.S.C. 491(a)) is amended to read as follows: '(a) The activities carried out pursuant to section 7 shall be subject to the performance accountability measures that are based on indicators described in section 116(b)(2)(A)(i) of the Workforce Innovation and Opportunity Act.'."

While I am not an expert on workforce investment program rules and regulations, I imagine that WIOA section 307 requires revisions of state labor exchange performance accountability measures and, consequently, revisions in LERS to provide the necessary data.

In any case, in ETA's submission of the LERS information collection request to OMB, I encourage it to update its supporting statement and forms to reflect:

- the passage of WIOA,
- ETA's expectations regarding the design of Wagner-Peyser section 7 "performance accountability measures that are based on indicators described in section 116(b)(2)(A)(i) of the Workforce Innovation and Opportunity Act," and
- the implications of the design of Section 7 performance accountability measures for LERS.

I appreciate the opportunity to comment on the proposed renewal of LERS and hope you find these thoughts helpful.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew Reamer".

Andrew Reamer
Research Professor