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August 31, 2015

Jeffrey B. Haluska
Office of Unemployment Insurance
Room S-4524
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue
Washington, DC 20210

Subject: Comment Request for Information Collection for Unemployment Insurance Call Center Final Assessment, New Collection

Dear Mr. Haluska:

On behalf of the 1.6 million members of the American Federation of State, County and Municipal Employees (AFSCME), AFL-CIO, we appreciate the opportunity to provide comments on the *Comment Request for Information Collection for Unemployment Insurance Call Center Final Assessment, New Collection*. Our members include employees in state public employment service offices (ES), unemployment insurance offices (UI), vocational rehabilitation services (VR), trade adjustment assistance (TAA), other state workforce agencies, and in local one-stop operations. AFSCME advocates for strengthening state administrative systems, including more investment in technology and staffing, to ensure that workers do not face significant challenges in accessing UI benefits.

AFSCME supports the proposed collection of information regarding UI Call Center operations. We believe that a comprehensive study of call center operations in the 53 jurisdictions with UI programs will be a vital first step toward insuring that all states establish and meet performance standards for call center claims-filing.

In reviewing the proposed survey, we recommend that the Department of Labor consider adding the following questions:

1. Is there any contracting out of Call Center operations? If so, which functions? (Add to section 1.1)
2. How do you determine staffing numbers? (Add to section 3.2)
3. How do you incorporate workers' experience into the agency's training program? (Add to section 3.4)
4. Do you have a claim-load ratio for staff? If so, what is it? (Add to section 3.8)
5. Do you reduce staff during slow periods? If so, how is this accomplished (e.g. transfer staff to back office, layoffs)? (Add to Section 3.8)

American Federation of State, County and Municipal Employees, AFL-CIO

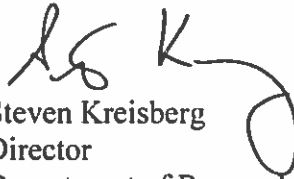
TEL (202) 429-1000 FAX (202) 429-1293 TDD (202) 659-0446 WEB www.afscme.org 1625 L Street, NW, Washington, DC 20036-5687

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Lastly, AFSCME recommends that all survey results should be available publicly, such as being posted on a website along with the final assessment.

Thank you for your attention. Should you have any questions, please contact Sookyung Oh at soh@afscme.org or 202-429-1095.

Sincerely,

A handwritten signature in black ink, appearing to be 'SK' followed by a large, stylized loop.

Steven Kreisberg
Director
Department of Research &
Collective Bargaining Services

SK/SO:tem