



December 4, 2017

Mr. Michael DeMale
Office of Workforce Investment
Employment and Training Administration, US Department of Labor
200 Constitution Avenue NW, Room C-4516
Washington, DC 20210

Re: Comments on Proposed Changes to ICR titled "Guam Military Base Realignment Contractor Recruitment Standards"

Dear Mr. DeMale:

The National Association of State Workforce Agencies (NASWA) appreciates the opportunity to provide comment on the proposed changes to the information collection request (ICR) titled "Guam Military Base Realignment Contractor Recruitment Standards" (OMB Control Number 1205-0484).

NASWA is a national organization of state administrators of the publicly-funded state workforce system, including the Workforce Innovation and Opportunity Act (WIOA), employment services, job training programs, unemployment insurance, employment statistics, veteran services, and labor market information. NASWA delivers policy expertise on workforce development, including unemployment insurance and other transitional support, as the voice of state workforce agencies.

The National Labor Exchange (NLx) is an electronic labor exchange network created in 2007 in a partnership agreement between NASWA and DirectEmployers Association. This is an unprecedented public-private partnership that leverages private nonprofit-owned technology with existing state workforce agency resources. The NLx collects and distributes job openings exclusively found on corporate career websites, state job banks, and USAjobs.gov. All job openings are unduplicated, currently available, and from vetted employers. The workforce agencies of all 50 states, the District of Columbia, Guam, and Puerto Rico have signed participation agreements with DirectEmployers to operate the NLx.

NASWA is pleased to see that the NLx is the listing mechanism for the Contractor Recruitment Standards. As noted above, the NLx is a public-private partnership between State Workforce Agencies and employers. Further, the NLx satisfies the Wagner-Peyser Act requirement for a nationwide labor exchange system that connects the labor exchange systems of all 50 states, the District of Columbia, Guam, and Puerto Rico.

NASWA is currently working with the Guam Department of Labor on the design and implementation of a .jobs microsite that will only focus on the Contractor Recruitment Standards. When launched, this microsite will provide an additional venue for contractors to make their jobs available to American workers. NASWA plans to market the site on behalf of the Guam Department of Labor and will work with ETA on continued education and training needs around the NLx.

NASWA does want to clarify the process for listing employment opportunities on the NLx. To list a job opening in the NLx, federal contractors and subcontractors can (1) submit a request for free indexing of the corporate website's job content, or (2) post the job in the appropriate state job bank at no cost. More information on these listing options can be found at <https://us.jobs/postajob.asp>.

When an employer lists employment opportunities with the Guam Department of Labor, the vendor that hosts the job bank (www.hireguam.com) will send the entire Guam employment file via API. The NLx will make these postings available on a Guam designed NLx microsite and share with all 50 states, the District of Columbia, and Puerto Rico.

Addressing the issue of required fields of information and information required to demonstrate compliance within the contracting listing standards, the NLx does not control the content of job listings and will be able to only display job listing information that is provided by the employer. Job listings submitted by employers will be posted on the NLx for the length of the job opening. It is up to Guam or the employer to post the jobs for the required time of 21 days. As long as the job is available on www.hireguam.com the job will be posted on the NLx network. Finally, it will be up to the employer to identify and save jobs posted on the NLx network. The NLx does not maintain a database of individual listings nor data on where those jobs have been posted.

With the exception of Guam, the Northern Mariana Islands and other territories in the South Pacific do not currently have signed NLx agreements with NASWA and DirectEmployers Association, thus their job banks do not accept the daily feed of NLx jobs. The development of agreements would provide these territories with the benefits of NLx services, including the daily exchange of job files, indexing, .jobs microsites, OFCCP compliance for federal contractors, and jobseeker analytics. With partnership agreements, they could also opt to incorporate the job postings from neighboring islands in their own job banks, increasing the job opportunities available to their jobseekers, such as the base construction jobs on Guam.

To facilitate the efforts of Guam military base realignment contractors in the recruitment of U.S. workers, the Employment and Training Administration should encourage all territories in the South Pacific to sign NLx participation agreements.

We would be happy to discuss our suggestions with you further, and thank you again for the opportunity to offer comments.

Sincerely,

A handwritten signature in blue ink that reads "Scott B. Sanders / ct". The signature is written in a cursive, flowing style.

Scott B. Sanders
Executive Director
NASWA