



June 11, 2018

Ms. Erin Good, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue NE
Washington, DC 20212

Re: Proposed Collection, Comment Request

Dear Ms. Good:

The National Association of State Workforce Agencies (NASWA) appreciates the opportunity to provide comment on the proposed extension of the “Job Openings and Labor Turnover Survey (JOLTS).”

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 unprecedented public-private partnership 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.

JOLTS contains indicators that inform NLx operations and strategic direction, contribute to internal program evaluation, and support research projects benefiting NLx stakeholders. Data on job vacancies, labor hires, and labor separations serve as benchmarks for comparison with NLx job opening numbers. This allows us to broadly evaluate the extent to which the NLx captures job vacancies on the national level. Employment statistics broken down by industry also illuminate potential sources of selection bias in the NLx dataset, directing our outreach and operations efforts to mitigate data quality concerns. Internal evaluation enables the NLx partnership to better serve state workforce agencies, so that they can accelerate time to reemployment for their jobseeker customers.

Due to the high quality of real-time NLx data, the partnership is well-positioned to analyze trends in labor market demand. The JOLTS data is critical for validating research questions, findings, and projections. While many of our future research projects aim to generate insights at



the state and local levels, the national JOLTS reports provide useful context for time series analysis and seasonal variation. Information on hires and separations reduces the need to use job posting numbers as proxies for hiring, and creates a more complete picture of job advertisements as they relate to total employment. The nature of the survey collection also complements datasets like the NLx, which inevitably lack data on job openings that are not advertised online.

NASWA is pleased that there are no major changes being made to the survey procedures in an effort to minimize burden on respondents. Specifically, the frequency of the information collection is a key part of the JOLTS reports' practical utility for the NLx. The monthly collection interval permits regular assessment of NLx capacity and systems, in addition to longitudinal analysis. A less frequent information collection process would hinder existing research projects and restrict future opportunities to provide policy decision-makers with relevant and current information. The JOLTS reports will be a preferred dataset for new research projects, since most other public datasets are only available at a significant time lag.

As the monthly JOLTS time series grow longer and the NLx looks to build new data products, there will be increased opportunity to bring together reliable labor statistics for the benefit of myriad stakeholders. The combined data would help accurately characterize career opportunities for use by jobseekers, state workforce agency staff, and employers.

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

Sincerely,

Scott B. Sanders
Executive Director
NASWA