

From: [Penny J Rosser](#)
To: [ETA, OFLC Forms - ETA](#)
Subject: Comment: Form ETA-9141 Prevailing Wage Request Form OMB Control Number 1205-0508
Date: Friday, April 12, 2019 3:27:37 PM

Dear Employment and Training Administration,

We are grateful for this opportunity to provide comments on the form ETA 9141 Application for Prevailing wage Determination. I am submitting this comment on behalf of the International Scholars Office at the Massachusetts Institute of Technology. We frequently submit requests for prevailing wage determinations for faculty and postdoctoral research scientists, and so have a strong interest in the modification of ETA-9141.

We commend ETA for adding breakouts of specific questions, such as the checkboxes for indicating the type of ACWIA employer, fields for Alternative Job Requirements, and checkboxes for Special Skills or Other Requirements.

We have three concerns for your consideration:

1. **There must be sufficient space to type responses.** This is a persistent problem with tightly packed forms. Users have had to abbreviate in ways that may be barely comprehensible to ETA agents. Or, only partial information can be typed.

On this latest draft version of the form, sufficient space will be especially important in fields such as:

Part F, Job Offer Information, 3a “Occupation(s) of the employees to be supervised.” On the former version of ETA-9141, the form asked for “number of employees worker will supervise.” This field is now gone and in its place is a very small space in which to type “occupation(s) of the employees to be supervised.”

Part F, b “Minimum Job Requirements”

1.b. Major(s) and/or field(s) of study required (may list more than one related major or more than one field.” This space on the form has never accommodated enough characters and is very frustrating. Also:

3.b. Indicate the field(s)/name(s) of training required

4.b. Indicate the occupation required

2. **Appendix A.** In Section F. e.7. “Will work be performed in any Bureau of Labor Statistics area other than the BLS area of the address listed above...” If yes, a completed Appendix A is required. **How will Appendix A be accessed? Will it come up in a pop-up window if “yes” is checked?**
3. G. Prevailing Wage Determination, 3b. and 3d.: If the ETA agent issuing the prevailing wage determination lists more than one ONet Code/Title, which one should the employer then list on the Labor Condition Application? The LCA has one space for SOC (ONet/OES) Occupation

Title.

We urge the ETA Administration to remember that the space to adequately describe the job, and to give the ETA agents sufficient information to generate an accurate prevailing wage determination, should not be sacrificed for the sake of “fitting” the finished ETA 9141 Form neatly on 5 pages.

Once again, we appreciate the chance to have our comments considered.

Regards,

Penny

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