VIA ELECTRONIC SUBMISSION

June 15, 2015

Adele Gagliardi Administrator Office of Policy Development and Research U.S. Department of Labor 200 Constitution Avenue, NW Washington, DC 20210

Re: Docket ID ETA-2015-

order to target more investments in worker training connected to employer skill needs. Following are our specific comments on the NPRM:

Employment Measure

Analysis: WIOA lists new primary indicators of performance. The first requires states to report on the percentage of participants in unsubsidized employment in the second quarter after exit from the program. The Labor and Education Departments seek comment on whether and

programs help employed and underemployed individuals find new or better jobs.1

Comment:

effective measure as part of the primary indicators of performance.

may bias local providers to ignore industries or companies under the false premise that empl

Employer Measure

Analysis: WIOA creates a new Employer Measure as the sixth primary indicator of performance. The Labor and Education Departments suggest a number of approaches and seek comments on how to implement this measure.²

Comment: We believe the employer measure starts with two overarching principles:

1. All elements of the employer measure should

organizations, we appreciate the Labor and Education Departments consideration of our comments and recommendations on this very important issue. We believe that aligning the public workforce system with employer needs will ultimately result in a stronger economy and a better future for job seekers. Our organizations look forward to continuing our work with the public workforce system at all levels to get employers engaged and help provide individuals with skilled training and industry-recognized credentials that lead to a successful career. We would welcome any future opportunities to assist the agencies in achieving this goal.

Sincerely,

American Staffing Association
Associated Builders and Contractors
Associated General Contractors of America
Independent Electrical Contractors
Opportunity America
National Roofing Contractors Association