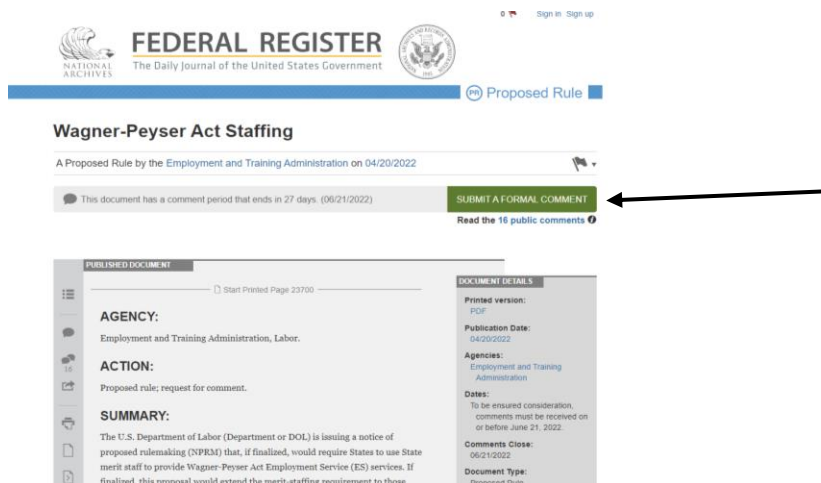


Step by Step Instructions on how to provide public comment on the Wagner Peyser NPRM

1. Go to: <https://www.federalregister.gov/documents/2022/04/20/2022-07628/wagner-peyser-act-staffing>
2. Click on, "SUBMIT A FORMAL COMMENT"



3. Copy/Paste the below text into the comment box:
4. **PART 652—ESTABLISHMENT AND FUNCTIONING OF STATE EMPLOYMENT SERVICE**

Section 652.215 Can Wagner-Peyser Act-funded activities be provided through a variety of staffing models? (page 23706)

The Department seeks comment on the benefits and costs of transitioning to a State merit-staffing requirement in instances where States are using staff other than State merit staff to deliver services. In addition, the Department seeks comment on any positive or negative impact this change would have in terms of the quality of services provided within the American Job Centers—including those funded by WIOA. (page 23707)

Colorado has served as a Wagner-Peyser demonstration state since the 1980's and completed its transition to the use of local merit system staff in 2010 through a process of staff attrition over a 14-year period of time. As a result Mesa County has been able to fully integrate the delivery of WIOA and Wagner-Peyser services in support of the key purposes of WIOA resulting in the below outcomes:

- 7,938 individuals employed within 6 months of accessing our services
- 741 unique employers served
- 36 unique workshops offered
- 41 Hiring Events held
- \$19,110,548.00 Economic Impact
- \$23,681,090.71 Total Return on Investment
- \$85.48 return on investment for every \$1.00 spent

One of the main reasons cited by USDOL in the NPRM for this potential change is for better training, access, and implementation of the unemployment system by Wagner Peyser staff; that way we can better serve unemployment customers in the event of another pandemic or natural disaster. Through the height of the pandemic in Mesa County (2/1/2020 – 6/30/2021) our Workforce Center received 25,642 unemployment related phone calls and made 20,995 outbound calls. Our workforce center stood up a virtual call center in an effort to provide support to the unemployment customers. This is a great example of a locally controlled Wagner Peyser program adapting to the huge demand in unemployment volume, while being locally controlled. We will continue to collaborate with the Division of Unemployment to provide exceptional customer service as a Demonstration State.

If Colorado were to lose our Demonstration status, Mesa County will be forced to lay off roughly 16 staff members or 62% of our CDLE Program staff. This move would result in a \$1,000,882 loss for Mesa County and create a huge disruption in services. We cannot afford this, nor can our customers afford to withstand this type of disruption in our system as we come out of the pandemic.

FEDERAL REGISTER
The Daily Journal of the United States Government

Proposed Rule

Wagner-Peyser Act Staffing

A Proposed Rule by the Employment and Training Administration on 04/20/2022

You are submitting an official comment to Regulations.gov. Comments are due 06/21/2022 at 11:59 pm EDT.

Thank you for taking the time to create a comment. Your input is important.

Once you have filled in the required fields below you can preview and/or submit your comment to the Labor Department for review. All comments are considered public and will be posted online once the Labor Department has reviewed them.

You can view alternative ways to comment or you may also comment via Regulations.gov at <https://www.regulations.gov/comment/E-TA-2022-0003-0001>.

Comment*

PART 652—ESTABLISHMENT AND FUNCTIONING OF STATE EMPLOYMENT SERVICE

Section 652.215 Can Wagner-Peyser Act-funded activities be provided through a variety of staffing models? (page 23796)

The Department seeks comment on the benefits and costs of transitioning to a State merit-staffing requirement in instances where States are using staff other than State merit staff to deliver services. In addition, the Department seeks comment on any positive or negative impact this change would have in terms of the quality of services provided within the American Job Centers—including those funded by WIOA. (page 23797)

Colorado has served as a Wagner-Peyser demonstration state since the 1980's and completed its transition to the use of local merit system staff in 2010 through a process of staff attrition over a 14-year period of time. As a result Mesa County has been able to fully integrate the delivery of WIOA and Wagner-Peyser services in support of the key purposes of WIOA resulting in the below outcomes:

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Upload File(s) **+ Add a file** *Note: You can attach your comment as a file and/or attach supporting documents to your comment. Attachments are limited to 10 MB.*

5. Click, "Add a file." Attach the Workforce Development Board signed letter that was sent out by Curtis

Thank you for taking the time to create a comment. Your input is important.

Once you have filled in the required fields below you can preview and/or submit your comment to the Labor Department for review. All comments are considered public and will be posted online once the Labor Department has reviewed them.

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Comment*

Upload File(s) **+ Add a file** *Note: You can attach your comment as a file and/or attach supporting documents to your comment. Attachment Requirements.*

Email
this will NOT be posted on regulations.gov

Opt to receive email confirmation of submission and tracking number?

6. Add in your email, click on individual and complete the below information

Email
this will NOT be posted on regulations.gov

Opt to receive email confirmation of submission and tracking number?

Tell us about yourself! I am...*

An Individual An Organization Anonymous

First Name*

Last Name*

City

State

Zip

Country

Phone

You are filing a document into an official docket. Any personal information included in your comment text and/or uploaded

7. Click on, "Submit Comment"

State: Colorado

Zip: 81504

Country: United States

Phone: 9702487562

You are filing a document into an official docket. Any personal information included in your **comment text and/or uploaded attachment(s)** may be publicly viewable on the web.

I read and understand the statement above.

[SUBMIT COMMENT](#) [Preview Comment](#)

Please review the Regulations.gov privacy notice and user notice.

PUBLISHED DOCUMENT Start Printed Page 23700

AGENCY:
Employment and Training Administration, Labor.

ACTION:
Proposed rule; request for comment.

SUMMARY:

DOCUMENT DETAILS

Printed version:
PDF

Publication Date:
04/20/2022

Agencies:
Employment and Training Administration

Dates:
To be ensured consideration,