



November 26, 2010

U.S. Department of Labor, Employment and Training Administration
Office of Policy Development and Research
200 Constitution Avenue NW, Room S- 5206
Washington, DC 20210
Attention: Karen A. Staha

[Submitted Electronically]

Re: Comments on Data Validation Requirement for Employment and Training Programs (OMB Control No. 1205-0448): Extension with No Changes

Ms. Karen A. Staha:

President

Irene B. Collins
Alabama

On behalf of the National Association of States United for Aging and Disabilities (NASUAD), I am pleased to provide the following comments:

Vice President

James Toews
Oregon

NASUAD represents the 56 officially designated state and territorial agencies on aging. Over two-thirds of NASUAD's members house their state's Senior Community Service Employment Program (SCSEP). NASUAD has built a strong relationship with the state SCSEP grantees, including those grantees who are not housed in a state agency on aging.

Treasurer

Charles D. Johnson
Illinois

NASUAD understands and supports the need for all SCSEP grantees to be held to a high standard of accountability for program implementation and documentation in order to ensure the program's value and effectiveness for SCSEP participants. We therefore understand the Employment and Training Administration's (ETA) need to validate performance data in order to ensure its accuracy.

Secretary

Carol Sala
Nevada

NASUAD is concerned that the administrative burden imposed by the data validation process is a barrier to participation for some SCSEP applicants, specifically those who are considered frail or who have a severe disability. The validation paperwork necessary for a SCSEP participant's documentation of these conditions is cumbersome and often difficult for many participants to obtain. The consequence of this lack of proper documentation is the termination of the participant from the SCSEP program.

Immediate Past

President
Patricia A. Polansky
New Jersey

Second, the ETA has underestimated the burden of time and costs involved in the collection of the source documentation required for data validation. Especially for those state grantees working in rural counties, the costs and time involved in traveling to collect certain documentation is often unavoidable.

Past President

Kathy Leitch
Washington

With these concerns in mind, NASUAD recommends that the ETA should: 1) streamline the data validation paperwork; 2) reduce the paperwork needed for a participant to prove they are frail or have a severe disability; and 3) recognize and work to reduce the burden of time and costs involved in the data validation process.

Thank you for the opportunity to comment on the Data Validation Requirement for Employment and Training Programs. Should you have any questions, please contact Martha Roherty, NASUAD Executive Director, at 202-898-2578.

Sincerely,

A handwritten signature in blue ink that reads "Martha Roherty". The signature is written in a cursive, flowing style.

Martha Roherty
Executive Director