NOTE TO REVIEWER

The reason for the lengthy time between the publication of the 60 day FRN (August, 2008) and this submission to OMB for action is due to the Employment and Training Administration's (ETA) prolonged internal debate, given the more robust survey standards issued by OMB in 2006, on whether to continue the statistical methodology inferences inherent in the customer satisfaction survey. Customer satisfaction surveys are conducted quarterly and reported electronically to ETA each year on the Workforce Investment Act (WIA) Annual Report (Form 9090, OMB Control No. 1205-0420).

Although WIA requires states to measure satisfaction, 31 states have been approved waivers to report on common performance measures, which assess outcomes only. These common measures focus on entered employment, retention, and earnings for adults and dislocated workers, and employment/education placement, degree/certificate attainment, and literacy/numeracy gains for youth. Therefore, these states do not report to ETA on customer satisfaction. While the remaining 22 states still report on customer satisfaction, this measure is reported only in the state's WIA Annual Report, and the results are not considered in determining either eligibility for WIA incentive grants or sanctions for poor performance. Eliminating statistical inferences does not detract from either the quality or utility of the information collected by the customer satisfaction survey.

To reiterate, the only goal of the customer satisfaction survey is to report a summary of the responses received, without any explicit or implicit inferences to a larger population. In all reports and other publications and statements resulting from this survey, no attempt will be made to draw inferences to any population other than the population that responded to the survey. State grantees will be instructed to footnote their customer satisfaction survey results in their WIA Annual Report narrative as follows: "the response rate was X percent and the results are not intended to make any inferences to any population other than the population that responded to the survey."