

**U.S. DEPARTMENT OF LABOR**  
**Bureau of Labor Statistics Concurrence of Surveys Employing Statistical Methods**

<b>TO:</b> Daniel Gillman[gillman.daniel@bls.gov]	<b>DATE:</b> 4 25 2011
	<b>FAX:</b>
<b>FROM:</b> Bonnie Naradzay, ETA Compliance Officer for PRA	
For Review by John Eltinge, Ph.D.	
<b>ACTION:</b> Review the attached survey, indicate approval or disapproval and return to the sponsoring agency or program. Comments shall not be made on the proposed report but in the comments space below.	
<b>TITLE OF SURVEY OR EVALUATION</b> WIA God Standard Evaluation (Survey)	
<b>CLEARANCE</b> <input type="checkbox"/> <b>Approved</b> <span style="margin-left: 200px;"><input type="checkbox"/> <b>Disapproved (See comments below)</b></span> <input checked="" type="checkbox"/> <b>Approved with caveats (See comments below)</b>	
<b>COMMENTS</b> 1. BLS does not have sufficient information to verify the accuracy of some statements in this package. In addition, BLS has no responsibility for any aspects of the proposed work, beyond review of some mathematical material provided in the package.  2. Per page 1 of Part B, the package for the second portion of the proposed data collection has not been received by BLS to date and thus is not approved. Our understanding is that at some point in the future the ETA plans to handle this second portion of the data collection in a separate OMB PRA statistical package. Our understanding is that this prospective second OMB package would be subject to standard reviews by BLS and the OMB Statistical Policy Office. Any potential approval of the second package would depend on the content of that second package.  3. Per the first paragraph of Section 1 of Part A, no valid statistical inferences can be drawn from these data to any population outside of those served by the program during the period covered by the evaluation.  4. The proposed design is not robust against biases potentially arising from PSU-level nonresponse.  5. The use of "replacement" sites for nonresponding PSUs is not approved, and a final decision on use of replacement sites is left to the discretion of the OMB Statistical Policy Office. Primary problems with the proposed use of "replacement" sites include the following.  5.a. This method has been known for over fifty years to involve serious risks of bias due to nonresponse. Some parts of the package (e.g., page 10 of part B) appear to confuse the important	

distinction between a known random selection mechanism established a priori, and unknown nonresponse mechanisms.

5.b. Due to the moderate number of PSUs involved, under general mathematical conditions the proposed use of "replacement" sites will be inefficient and will incur additional risks of bias, relative to use of appropriately applied propensity and regression methods.

**(Comment space expands to accommodate all necessary comments)**

**Disclaimer:** BLS is approving only the statistical methodology as presented in the written documentation, and not necessarily passing judgment on the questionnaire itself nor on the necessity to conduct the collection of information.

**SIGNATURE OF BLS REVIEWER**



**DATE**

*William Mackowski for John Eltinge, per e-mail review from  
John Eltinge on June 22, 2011*

6 / 23 / 2011

DL-1-150A (Rev. 5/03)