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To: [Patel, Jagruti - ETA](#)
Cc: [OUI PRA Inbox](#)
Subject: FW: Comments Responding to OMB Control Number 1205-0510
Date: Friday, August 22, 2025 6:39:05 AM

Hi Jagruti,

The below public comment message was received in response to the Agency Information Collection Activities; Comment Request; Federal-State Unemployment Insurance Program Data Exchange Standardization FRN.

Kevin A. Stapleton

Director – Division of Fiscal & Actuarial Services
Employment and Training Administration
U.S. Department of Labor
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From: Fichter, Stephanie A - ETA <Fichter.Stephanie.A@dol.gov>
Sent: Wednesday, August 20, 2025 3:16 PM
To: OUI PRA Inbox <OUI-PRA@dol.gov>
Subject: FW: Comments Responding to OMB Control Number 1205-0510

Stephanie A. Fichter

Program Manager
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From: DOL-PRA-Public <DOL-PRA-Public@dol.gov>
Sent: Friday, August 15, 2025 2:38 PM
To: ETA, Pagemaster - ETA <ETAPagemaster@dol.gov>
Cc: Fichter, Stephanie A - ETA <Fichter.Stephanie.A@dol.gov>; Bouchet, Nicole - OASAM OCIO <bouchet.nicole@dol.gov>; Hernandez, Nora - OASAM OCIO <Hernandez.Nora@dol.gov>; Howell, Michael D - OASAM OCIO <Howell.Michael.D@dol.gov>; Rodriguez Vega, Harry - OASAM OCIO <RodriguezVega.Harry@dol.gov>
Subject: FW: Comments Responding to OMB Control Number 1205-0510

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Regards.

Harry Rodriguez Vega

IT Specialist

OASAM/OCIO

U.S. Department of Labor

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From: Doug Holmes <holmesd@uwcstrategy.org>

Sent: Friday, August 15, 2025 12:13

To: DOL-PRA-Public <DOL-PRA-Public@dol.gov>

Subject: Comments Responding to OMB Control Number 1205-0510

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Please accept the comments below in response to the Federal Register Notice with respect to the continuation of the use of XML as the data exchange standardization for the Federal-State Unemployment Insurance Program.

We represent employers, third-party administrators, and states with respect to the development and implementation of sound business practices in the administration of the Unemployment Insurance program. Based on a survey of our members we conclude that the use of XML should be continued.

The use of XML should be continued as the data exchange standard for a number of reasons.

1. Most states have adopted the State Information Data Exchange System (SIDES) and built state systems using XML.
2. SIDES is currently expanding modules for efficient administration with the

assumption that XML will continue to be used.

3. Employers and TPAs have developed their own systems to interface with state and federal agencies using SIDES.
4. A change in the data exchange standards would disrupt proper administration, create unnecessary barriers in the short term and long term,
and increase costs for the federal government, states, employers and TPAs.

If there is an interest in modifying the data exchange standardization there should first be considerable consultation with the program stakeholders and analysis of the costs and impact on efficiency associated with the transition.

Thank you for the opportunity to comment.

Douglas J. Holmes

President

UWC – Strategic Services on Unemployment & Workers' Compensation

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