



**EVALUATION OF
AMERICA'S CAREER KIT**

EMPLOYMENT AND TRAINING ADMINISTRATION

REPORT NUMBER : 2E-03-390-0002
DATE ISSUED: September 27, 2001

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ACRONYMS

ACK	-	America's Career Kit
AJB	-	America's Job Bank
CFR	-	Code of Federal Regulations
CRC	-	Civil Rights Center
DOL	-	U.S. Department of Labor
EEO	-	Equal Employment Opportunity
EO	-	Executive Order
ESA	-	Employment Standards Administration
ETA	-	Employment and Training Administration
FY	-	Fiscal Year
LEP	-	Limited English Proficiency
OIG	-	Office of Inspector General
OFCCP	-	Office of Federal Contracts and Compliance Program
PY	-	Program Year
SOL	-	Solicitor of Labor
VETS	-	Veterans' Employment and Training Service
WIA	-	Workforce Investment Act

EXECUTIVE SUMMARY

We conducted an evaluation of the Employment and Training Administration's (ETA) development and implementation of America's Career Kit (ACK). Our evaluation covered Program Years (PY) 1997 through 2000. The evaluation was designed to assess whether ACK has: (1) developed adequate performance measures to gauge the overall success of the program, and (2) addressed the compliance requirements of Department of Labor equal employment opportunity agencies.

ACK, the nation's most powerful on-line career development resource, provides direct internet-based access for Americans needing job search assistance, career guidance, salary data and training and educational resources. ACK is a federal/state partnership financed through grants to states by the U.S. Department of Labor (DOL). Since 1997, ACK has received total DOL funding of \$116.5 million, including \$42.5 million for the current program year.

ACK has four components that offer unique solutions to the increasing demands of today's labor market in meeting the specialized needs of job seekers, employers, workforce development professionals, and the training and education community. America's Job Bank (AJB) is one of the four components, and is the most widely-used tool of ACK. Presently, AJB is an internet job search tool which allows both employers and job seekers to place job listings and resumes.

RESULTS OF EVALUATION

Our evaluation identified several concerns related to the development, implementation, and monitoring of ACK. More specifically, the issues identified were related to the AJB component of ACK. We did not identify any issues with the other components of ACK; therefore, we focused our evaluation on AJB.

FINDING 1 - The Overall Effectiveness of America's Job Bank is Difficult to Assess

We identified several areas where ETA/AJB can more effectively assess program performance. First, current measures do not capture all aspects of Job Bank performance. AJB's performance standard for PY 1999 is a one percent increase in the number of jobs posted on the AJB web site. Our analysis indicates that the number of job listings on the website is increasing. However, *usage* of the AJB web site is more difficult to assess; the number of server accesses ("web hits") is declining whereas the number of times the available job database is searched is showing modest improvement. These examples point to the need for multiple measures in order to fully assess performance. Using the performance standard "number of jobs posted" does not give a complete picture. We assert that program performance depends on a number of factors. In order to fully assess the performance of AJB, ETA should consider the effect of dimensions such as usage (web site utilization) and utility (to what degree did the web site aid individuals in finding employment). Second, current performance measures associated with AJB address program *outputs* rather than program *outcomes*. Current measures address the product (i.e., job listings) rather than the

impact the product has on customers (i.e., finding employment). The 1998 Workforce Investment Act (WIA) requires One-Stop Centers to collect data on *program outcomes* on a quarterly basis. This data includes information regarding the number of One-Stop users that have found jobs, how many are still employed, and how long they have held those jobs. While "self-service activities" (e.g., AJB) are exempt from this provision under Section 136(2)(A)(1), ETA should consider these measures in developing performance measures centered on *program outcomes*.

Finally, WIA provisions emphasize customer service. AJB serves the needs of two *types* of customers, employers and job-seekers. ETA has conducted a study of *employer* satisfaction, but *job seeker* customer service has received significantly less attention. As job seekers are at the center of the purpose of AJB, we recommend that ETA devote significant effort to analyzing job seeker satisfaction. This analysis should be completed for registered as well as anonymous users.

Given that AJB is an integral tool for providing American workers the access to employment assistance, there is a strong need for precise performance evaluation and program enhancement. Action on these items will enable AJB to streamline program delivery, more effectively serve its program recipients, and precisely gauge program performance.

FINDING 2 - ETA Has Not Fully Addressed the Compliance Concerns of DOL Agencies Responsible for Equal Employment Regulations

The current version of AJB needs to further address the compliance needs of three equal employment opportunity agencies in the Department of Labor—the Office of Federal Contract Compliance Programs, the Civil Rights Center, and the Veterans' Employment and Training Service. ETA is working with these agencies to resolve their concerns and has made some progress. However, our evaluation identified several outstanding areas pertaining to implementation of equal employment opportunity regulatory requirements that need to be addressed. These areas include:

- Insufficient instructions to employers advising them of the regulatory requirement to collect demographic data and analyze the impact of their selection procedures. We recognize that responsibility for providing information on the regulatory requirements must come from the enforcing agency (i.e. OFCCP). Nevertheless, as the coordinator of the AJB in DOL, ETA must facilitate the process with OFCCP.
- Current procedures to allow employers and EEO agencies to *easily* retrieve demographic information needed to comply with various record keeping requirements at various stages of applicant site searches are awkward and time consuming.
- It is unclear if a higher response rate for filling out the electronic tear-off sheet would be obtained if it is placed either before or after the registration process; ETA and the equal employment agencies should revise the instructions for the tear-off sheet to *encourage* job

seekers to provide demographic information; the veteran sub-category of Campaign Veterans is currently not included on the self-identification section of AJB.

- Limited English-proficient job seekers cannot effectively access AJB.
- Written instructions on how to use the historical demographic database, including information on the database's capabilities, are not readily available.

RECOMMENDATIONS

We recommend the following actions be taken by ETA to further enhance AJB:

1. Conduct an on-line survey of America's Job Bank web site users in order to determine the factors contributing to web site usage.
2. Review Workforce Investment Act performance measures and other industry initiatives for the purpose of developing applicable *outcome* performance measures.
3. Gather customer satisfaction data regarding America's Career Kit/America's Job Bank customer service.
4. Take a proactive approach to ensure that DOL regulatory requirements associated with data collection and impact analysis are available to employers using AJB.
5. Coordinate with DOL enforcement agencies (OFCCP, CRC, VETS) to identify how they can assist employers in meeting their EEO and Affirmative Action record keeping responsibilities.
6. ETA and EEO enforcement agencies together should: (a) determine where the electronic tear-off sheet should be inserted during the registration process in order to obtain the highest response rate, and (b) revise the instructions for the tear-off sheet to encourage job seekers to provide demographic information needed.
7. Provide access to AJB for limited English-proficient job seekers, in accordance with Executive Order 13166.
8. Incorporate the sub-category of Campaign Veterans to AJB self-identification section.
9. Develop and disseminate written instructions on the use of the historical demographic database, including information on the potential capabilities of the database.

AGENCY COMMENTS AND OIG CONCLUSION

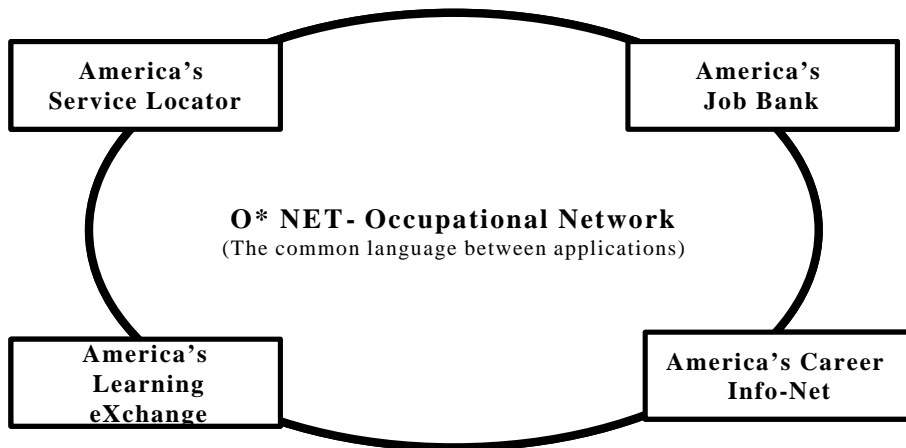
In response to the official draft report, ETA provided suggested clarifications and modifications as well proposed corrective actions. Many of the suggested clarifications and modifications have been incorporated into this report. All others are addressed in the “Agency Response and OIG Conclusions” section of this report. ETA’s complete response is located in the Appendix section of this report.

BACKGROUND

The Employment and Training Administration (ETA) began using its discretionary funds in program year (PY) 1994 to support the development and implementation of America's Labor Market Information System (ALMIS)—internet based products and services. This system, combined with One Stop Career Center Grants, which were implemented in PY 1996, addressed a need of both job seekers and employers—current and quality information on employment opportunities and training programs at a locally centralized location. ALMIS is an integrated series of Labor market information systems linked to Federal, Regional, State and local constituents. America's Career Kit (ACK) is a core component of ALMIS.

ACK, the nation's most powerful on-line career development resource, provides direct internet-based access for Americans needing job search assistance, career guidance, salary data and training and educational resources. ACK is a federal/state partnership financed through grants to states by the U.S. Department of Labor (DOL). ACK has four components that offer unique solutions to the increasing demands of today's labor market in meeting the specialized needs of job seekers, employers, workforce development professionals, and the training and education community. The following chart illustrates the inter-connectivity of the components of ACK.

America's Career Kit



(1) **America's Job Bank** (AJB), initially created in 1996, is the most widely-used tool in America's Career Kit. Prior to 1996 there was a program in New York for distributing unfilled state jobs called the Interstate Job Bank, which eventually grew into AJB. Presently, AJB is an internet job search tool which allows both employers and job seekers to place job listings and resumes. As of February 2001, AJB had an average of 1.3 million jobs and 475,610 resumes on its website.

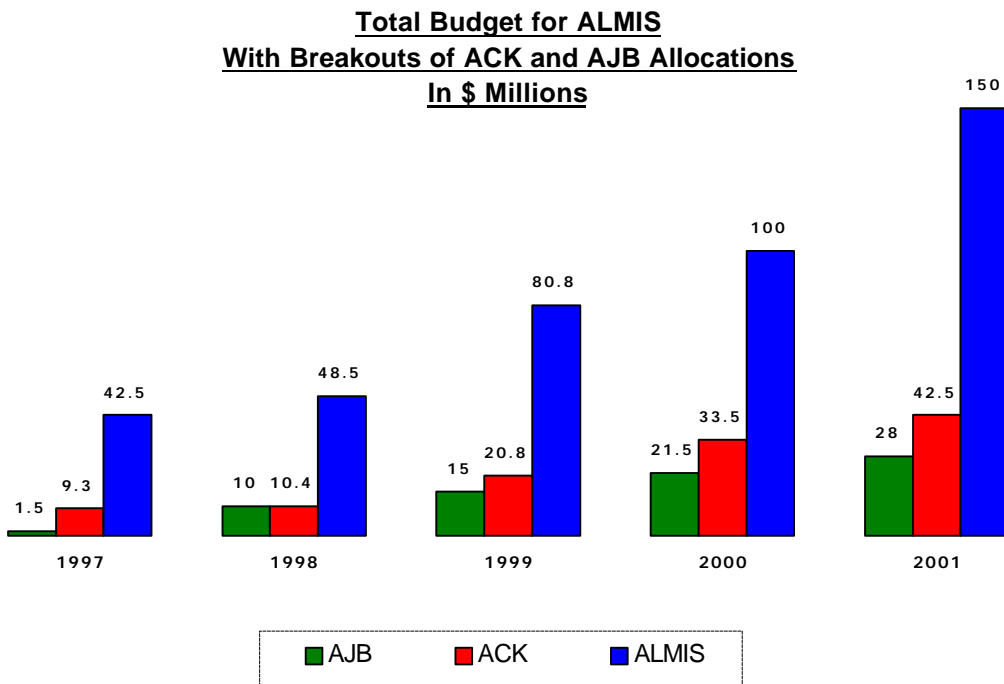
(2) **America’s Learning eXchange** (ALX) is a virtual yellow pages of training and education resources. It offers more than 300,000 courses and 6,000 training providers to the general public.

(3) **America's Career InfoNet** (ACINet) is an information source for smart career decisions. An electronic storehouse of national, state, and metro labor market data not available elsewhere. Employment trends, wages and an analysis of prevailing salaries and living cost anywhere in the country.

(4) **America’s Service Locator** (ASL) helps individuals to locate public service offices that assist in job-seeking, career planning, locating training, unemployment issues and employee-recruitment.

The *Occupational Network* (O*NET) is the “common language” for these products, and appears on diagrams as the underlying coding scheme that allows the products to talk to each other, but is not a formal part of the ACK.

The following chart shows ETA’s total allocated funding for ALMIS (\$422 million) for PYs 1997-2001, and the portion of those funds dedicated to ACK (\$116.5 million) and AJB (\$76 million)¹.



¹ Note: For Program Year 2001, \$42.5 million for America’s Career Kit and \$28 million for America’s Job Bank represent the budgeted funding levels; however these funds have not been allocated and invested in the products to date.

PURPOSE, SCOPE AND METHODOLOGY

PURPOSE

We conducted an evaluation of ETA's development and implementation of ACK. Our evaluation covered Program Years (PY) 1997 through 2000—roughly the period from July 1, 1997 through June 30, 2001. The evaluation was designed to assess whether ACK has:

- (1) developed adequate performance measures to gauge the overall success of the program, and
- (2) addressed the compliance requirements of DOL equal employment opportunity agencies.

SCOPE

During the course of our evaluation, we identified several concerns in the development, implementation, and monitoring of AJB. We did not identify similar problems with the other ACK components; therefore, we focused our evaluation on AJB.

METHODOLOGY

Our methodology employed the use of qualitative methods, quantitative methods and a document review as described below.

Qualitative Methods

We interviewed officials from the Civil Rights Center, ETA, Office of Federal Contract Compliance Programs, Office of the Solicitor of Labor and the Veterans' Employment and Training Services. Representatives from these agencies offered their perspective on the strengths and weaknesses of AJB as they relate to equal employment opportunity compliance concerns.

Quantitative Methods

America's Job Bank Service Center provided data regarding AJB web site usage and demographic characteristics of registered users. These data included: (1) frequency counts of server accesses ("web hits") over a 32-month span (from May 1998 to January 2001); (2) the number of job openings in each Occupational Information Network - Standard Occupational Classification (O*Net-SOC) category from May 1997 to January 2001; and (3) information regarding the required educational level of jobs posted on AJB and the number of job openings in each category of educational attainment.

Additionally, ETA provided information on ACK performance. These documents included analytical overviews of ACK components, enhancement plans, and two ETA-contracted evaluations of AJB.

Document Review

We examined documents regarding budget and program features, functionality, enhancements, and evaluations of ACK components. ETA provided us with analytical overviews of ALX, AJB, and America's Career InfoNet, the ACK enhancement plan, ALX strategic plan, several monthly reports for both ALX and ACINet, and two ETA contracted evaluations of AJB. The first evaluation was an analysis of "e-mail feedback" provided by users of the AJB site, the second analyzed data collected from interviews with employer-users. Additionally, we received the ACK budgetary schedule focusing on PYs 1994-2000.

We conducted our review in accordance with the *Quality Standards for Inspections* published by the President's Council on Integrity and Efficiency.

FINDINGS AND RECOMMENDATIONS

FINDING 1 - Overall Effectiveness of America's Job Bank is Difficult to Assess

Our evaluation of AJB identified several areas where ETA/AJB can more effectively assess program performance. First, current measures do not capture all aspects of Job Bank performance. AJB's performance standard for PY 1999 is a one percent increase in the number of jobs posted on the AJB web site. We assert, however, that program performance depends on a number of factors. In order to fully assess the performance of AJB, ETA should consider the effect of dimensions such as usage (web site utilization) and utility (to what degree did the web site aid individuals in finding employment).

Second, current performance measures associated with AJB address program *outputs* rather than program *outcomes*. Current measures address the product (i.e., job listings) rather than the impact the product has on customers (i.e., finding employment). The 1998 Workforce Investment Act (WIA) requires One-Stop Centers to collect data on *program outcomes* on a quarterly basis. This data includes information regarding the number of One-Stop users that have found jobs, how many are still employed, and how long they have held those jobs. While "self-service activities" (e.g., AJB) are exempt from this provision under Section 136(2)(A)(1), ETA should consider these measures in developing performance measures centered on *program outcomes*.

Finally, WIA provisions emphasize customer service. AJB serves the needs of two *types* of customers, employers and job-seekers. While ETA has conducted a study of *employer* satisfaction, *job seeker* customer service has received substantially less attention. As job seekers are at the center of the purpose of AJB, we recommend that ETA devote significant effort to analyzing job seeker satisfaction. This analysis should be completed for registered as well as casual users (who account for the majority of site visits).

Given that AJB is an integral tool for providing American workers the access to employment assistance, there is a strong need for precise performance evaluation and program enhancement. Action on these items will enable AJB to streamline program delivery, more effectively serve its program recipients, and precisely gauge program performance.

(A) Current AJB Performance Measures Do Not Gauge All Aspects of Output Performance

Data received from America's Job Bank Service Center in New York permitted us to analyze ETA's current performance measure for AJB. According to the ETA Fiscal Year (FY) 1999-2004 strategic plan, the performance standard for AJB is a one percent increase in the number of jobs posted on the AJB web site. The benchmark for comparison utilized by ETA is the number of jobs posted on AJB in PY 1999. Figure 1 summarizes the trend in job postings. A large number of job listings are posted on the AJB web site, and this number is increasing. Based on this, we determined that the substantial number of job openings posted on AJB *does* facilitate employment opportunities for job seekers.

Further analysis indicates that the number of individuals visiting the AJB web site has increased substantially since the website's launch, from roughly 19 million visits in May 1998, to 170 million visits in January 2001 (see Figure 2). Conversely, since August 1999 the number of server accesses ("web hits") has steadily declined. However, this measure does not fully capture site usage; ETA representatives assert that alternative measures (such as number of job searches) more effectively represent AJB usage. Efforts are currently under way to track this information; ETA representatives provided preliminary data regarding job searches. This data indicates some modest increases in the number of job searches. Given the limited time frame of this data, however, no credible conclusions can be made regarding the trend in job searches. Further, ETA officials acknowledge that growth in usage of the AJB web site has not kept pace with the number of available positions. The increasing gap between available jobs and site usage highlights the shortcoming of using a **single** performance measure.

Figure 1.

JOB LISTINGS

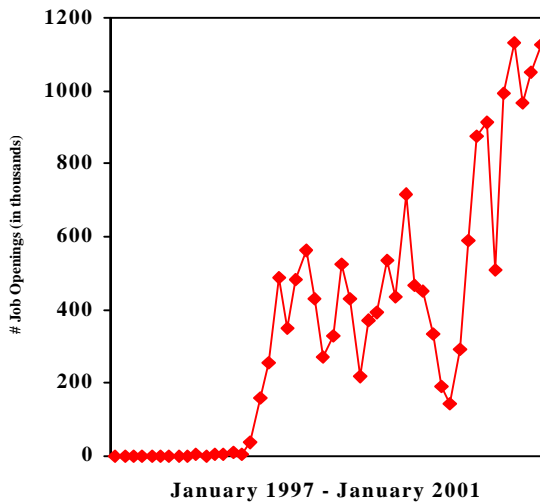
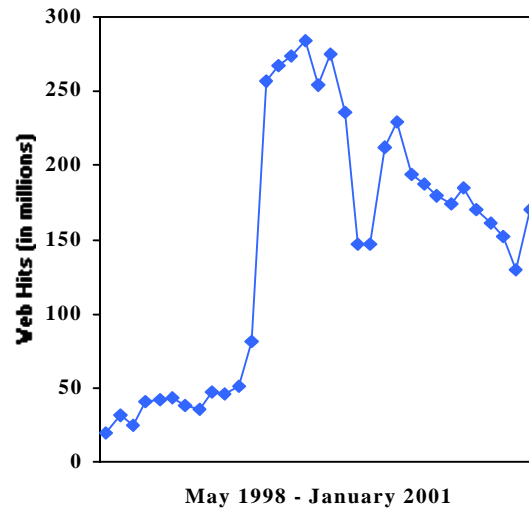


Figure 2.

AJB WEB SITE USAGE



Relying solely on one performance measure provides a skewed assessment of performance. As the charts above demonstrate, relying on a single measure could result in very different assessments regarding program performance. ETA's concerns about effective ways to measure site usage further reinforces the importance of multiple measures. Meeting goals regarding the number of jobs posted on AJB gives some insight into the program's performance; however, all aspects of overall performance cannot be captured in this one measure.

The slower rate of growth in site usage identified by ETA can be attributed to the popularity and growth of commercial sites. For example, *Monster.com* has experienced a compound quarterly growth rate of 20% since 1995 (*Monster.com* press packet). With over 12 million current job seeker accounts, we can reasonably assume that some of the declines in usage of AJB can be attributed to gains by commercial sites. An evaluation commissioned by ETA makes similar conclusions.

An evaluation, completed by Technical Assistance and Training Corporation (Washington, DC), focused on two primary weaknesses of the AJB web site. The first weakness is identified as “difficulty of use,” and the second as “customer service problems.” Combined, these two elements are the site’s most serious flaws. Despite high levels of market awareness, AJB has “low brand strength,” according to the *Electronic Recruiting Index 2000* report. This means that individuals are aware of the self-directed employment services provided by AJB, but choose to utilize other sites.

These concerns may be created or exacerbated by the “difficulty of use” of the AJB web site. Where commercial sites often require minimal information and “number of clicks” to retrieve job search information, the AJB’s information architecture is more cumbersome. The industry standard is currently three clicks. AJB’s information architecture currently requires four or five clicks, depending on the specificity of the search and the options chosen. Consequently, workers *may be* electing to use *commercial* self-directed employment resources rather than those provided by ACK and specifically AJB.

(B) Current Performance Measures Do Not Focus on Program Outcomes

Based on observations noted in (A), AJB appears to provide access to a significant number of jobs; however, the lack of multiple performance measures impedes the ability to make solid conclusions regarding the overall effectiveness of AJB. These two items highlight the importance of focused performance measurement. According to the ETA FY 1997-2002 strategic plan, the performance goals related to ACK were: (1) increasing the number of employers listing jobs on AJB, and (2) increasing the number of resumes in ATB (America’s Talent Bank has since been combined into AJB). In the FY 1999-2004 ETA strategic plan, the relevant performance goals were changed to measure increases in the number of total job openings listed with AJB. ETA notes that these changes were included to reflect WIA requirements and could be altered further.

The current ETA performance goal relevant to AJB measures the degree to which *access* to employment information is increasing. But this type of performance measure does not permit an assessment of *how well* the program is addressing its core purpose. Instead, an AJB performance measure based on increases in the number of currently available jobs focuses attention on program *outputs* rather than program *outcomes*.

The ETA Five-Year Research Plan for FYs 2000-2004 echoes a similar theme. The Research Plan notes that the answers to four critical questions weigh heavily in determining the performance level of self-directed employment services. They are:

1. How can new technologies increase access to employment and training services for job seekers and employers?
2. What are the demographic characteristics of individuals and employers that use AJB?
3. To what extent do individuals obtain employment as a result of using AJB?
4. Does AJB complement or substitute for local labor exchange services?

Each of these questions deals with a particular aspect of performance measurement. Specifically, they prompt ETA to learn who is using the program, what outcomes the program produces, and how the program can be altered to improve performance. Current performance measures can answer none of these questions.

ETA realizes the importance of outcome measurement. However, ETA has had difficulty in determining appropriate ways to measure outcomes. Commercial services such as *Monster.com* are not specifically interested in outcomes; they simply act as a job listing clearinghouse and derive their profits from advertising. Due to difference in motive, there is little industry consensus on outcome measurement. ETA has contracted a study of employment service industry trends in order to derive and shape appropriate outcome performance measures.

One possible source of outcome measures is WIA. The implementation of WIA in 1998 substantially altered the orientation of employment services from more intensive services to an emphasis on self-directed job search and career management through the One-Stop system. Job seekers visiting a One-Stop Center have access to core services provided by ACK through the internet. WIA requires that these One-Stop Centers submit quarterly reports on performance to appropriate state agencies; these data are compiled and forwarded to ETA. The performance measures for dislocated workers are:

1. The number of workers who have entered employment by the end of the first quarter after exit;
2. (Of those employed in the first quarter after exit,) the number who are employed in the third quarter after exit;
3. (Of those employed in the first quarter after exit,) the earnings in the second and third quarter after exist;
4. (Of those employed who received training services,) the number of workers who were employed in the first quarter after exit and received a credential (diploma, degree, other credential) by the end of the third quarter after exit.

These performance measures have been finalized and will take effect July 1, 2001, as reported in the May 31, 2001, *Notices* section of the *Federal Register*. However, these performance measures are intended to measure the effectiveness of the One-Stop delivery system as a whole. In order to effectively gauge the performance of AJB, ETA should utilize WIA reporting requirements for the purpose of developing applicable outcome performance measures.

These performance measures certainly address some aspects of self-directed employment services, as they will primarily be provided through the One-Stop System. While AJB is exempt from WIA reporting requirements under §136(2)(a)(1), we believe that these measures are a useful guide. Current performance goals relate only to the overall number of jobs available. In order to determine the effectiveness of ACK/AJB, performance measures must (as the ETA research plan notes) determine the demographic characteristics of individuals using AJB, and the extent to which individual job seekers obtain employment as a result of using AJB.

(C) AJB Performance Measures Do Not Incorporate Customer Satisfaction Concerns

A second feature of WIA that impacts performance measurement concerns customer satisfaction. WIA requires quarterly reporting of customer satisfaction data to ETA. The performance levels are measured by responses to a three-question battery that ask for job seeker reactions to the employment and job training services received at One-Stop Centers. No customer satisfaction measures exist with regard to AJB, even though previous evaluations noted that customer satisfaction/service is an important issue that requires attention.

To satisfy the customer service measurement requirements of WIA, One-Stop Centers will utilize customer satisfaction surveys. These surveys, initially, will use the American Customer Satisfaction Index (ACSI). This index is currently used extensively in the business community, including thirty Fortune 500 companies, and in many European countries. The index is created through simple aggregation of scores from three specific questions targeting various aspects of customer service. These questions are:

1. Overall, on a scale of 1 to 10, where “1” means “Very Dissatisfied” and “10” means “Very Satisfied,” how satisfied are you with the services?
2. Considering all of the expectation you may have had about the services, to what extent have the services met your expectations? “1” now means “Met None of My Expectations” and “10” means “Met All of My Expectations.”
3. Now I want you to think of the ideal program for people in your circumstances. How well do you think the services you received compare with the ideal set of services? “1” now means “Not Very Close to the Ideal.”

Surveys will be administered to both participants and employers, providing a wealth of information regarding program performance based on customer-reported perceptions. Previous evaluation of “customer satisfaction” with regard to AJB has been completed, but job seeker satisfaction has played a limited role. ETA has made progress toward addressing the concerns of job seekers through the implementation of a "pop-up" survey on the AJB web site. As a majority of the program's impact is derived from job seekers (i.e., individuals getting jobs), their perceptions regarding the successes and shortcomings of AJB are invaluable measures of performance.

Conclusion

Currently, ETA is making an effort to gauge AJB performance through program outputs. While ETA should continue to strive for more job listings on the AJB web site, ETA should increase its efforts to reliably measure the performance of AJB. Current performance measures do not account for different aspects of program performance. Reliance on a single measure (number of available jobs) hampers the future development of AJB and its ability to adapt its services to changing economic or workforce conditions. Additionally, the current performance measure addresses *program outputs* rather than *program outcomes*. Rather than an emphasis on whether AJB is helping people find and get jobs, the current measure emphasizes whether enough access to job information is available.

Finally, ETA has conducted a study of *employer* satisfaction, but *job seeker* customer service has received significantly less attention. As job seekers are at the center of the purpose of AJB, we recommend that ETA devote significant effort to analyzing job seeker satisfaction. This analysis should be completed for registered as well as anonymous users.

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Recommendations

We recommend that ETA:

1. Conduct an on-line survey of America's Job Bank web site users in order to determine the factors contributing to web site usage. Specifically:
 - A. On visiting the AJB web site, include a "pop-up" window which informs visitors that a customer satisfaction survey is in progress, and should they be willing to participate, an email survey will be sent to them. Anonymity can be maintained through requiring only an e-mail address to send the survey.
 - B. Design the survey in HTML format, or provide an HTML link in the email. This provides potential "interviewees" two opportunities to decline participation. The HTML format allows individuals to complete the survey and electronically "send" the information to appropriate data collection officials in a form readily convertible to spreadsheet or statistical software.
 - C. Include questions which specifically target factors influencing site usage. For registered users, include a battery of questions that address reasons for registering on the site. Areas for assessment should minimally include the following questions:
 - (1) How did the individual find out about AJB?
 - (2) What are the individual's demographic characteristics?
 - (3) How easy to use did the individual find the site?
 - (4) How helpful was the site in finding appropriate job listings?
 - (5) Would the individual use the AJB web site again?
 - (6) Has the individual used commercial self-directed employment sites?
 - (7) How does the AJB site compare to commercial sites?
 - (8) Did the individual find a job based on information viewed on the AJB site?
2. Review Workforce Investment Act performance measures and other industry initiatives for the purpose of developing applicable *outcome* performance measures.
3. Gather customer satisfaction data regarding America's Career Kit/America's Job Bank customer service.

FINDING 2 - ETA Has Not Fully Addressed the Compliance Concerns of DOL Agencies Responsible for Equal Employment Regulations

The current version of AJB needs to further address the compliance needs of three equal employment opportunity agencies in the Department of Labor—the Office of Federal Contract Compliance Programs, the Civil Rights Center, and the Veterans’ Employment and Training Service. ETA is working with these agencies to resolve their concerns and has made some progress. However, our evaluation identified several areas pertaining to implementation of equal employment opportunity regulatory requirements. These areas include:

- Insufficient instructions to employers advising them of the regulatory requirement to collect demographic data and analyze the impact of their selection procedures. We recognize that responsibility for providing information on the regulatory requirements must come from the enforcing agency (i.e. OFCCP). Nevertheless, as the coordinator of the AJB in DOL, ETA must facilitate the process with OFCCP.
- Current procedures to allow employers and EEO agencies to *easily* retrieve demographic information needed to comply with various record keeping requirements at various stages of applicant site searches are awkward and time consuming.
- It is unclear if a higher response rate for filling out the electronic tear-off sheet would be obtained if it is placed either before or after the registration process; ETA and the equal employment agencies should revise the instructions for the tear-off sheet to *encourage* job seekers to provide demographic information; the veteran sub-category of Campaign Veterans is currently not included on the self-identification section of AJB.
- Limited English-proficient job seekers cannot effectively access AJB.
- Written instructions on how to use the historical demographic database, including information on the database’s capabilities, are not readily available.

Through interviews with representatives of ETA and the EEO agencies, and a review of agency regulations and other documents, we concluded that ETA did not initially include the EEO agencies in the design phase of AJB. We believe that early involvement of these agencies in the design phase would have eliminated many of the current problems, particularly those related to regulatory requirements.

Below we summarize each of the agency’s authorizing regulations, identify the current problem areas we identified that are associated with AJB, and make recommendations for resolution.

(A) The Office of Federal Contract Compliance Programs, Employment Standards Administration

The Office of Federal Contract Compliance Programs (OFCCP) has the responsibility of assuring that employers doing business with the Federal Government comply with the equal employment opportunity and affirmative action provisions of their contracts. OFCCP administers and enforces three EEO programs: Executive Order 11246; Section 503 of the Rehabilitation Act of 1973; and the affirmative action provisions of the Vietnam Era Veterans' Readjustment Assistance Act of 1974.

OFCCP's regulations require three types of record keeping regarding federal contractors' employment processes, described below: development and maintenance of information to monitor employee selection processes (41 CFR Part 60-3); general record retention (41 CFR 60-1.12(a)); and development and maintenance of records and analyses necessary to an affirmative action program (41 CFR 60-1.40 and 60-2.1). If this information is not maintained by federal contractors who are using the AJB as one of its recruitment sources, and such a contractor is selected by OFCCP for a compliance evaluation, the agency is not able to conduct its required analyses of selection and hiring procedures. We recognize that it is the employer's responsibility to collect such data, but ETA should provide a system for information retrieval that is not cumbersome or time consuming. In other words, it should allow for *easy* retrieval of the data.

(1) General Data Requirements under the Uniform Guidelines on Employee Selection Procedures

Section 41 CFR 60-3.4(A) requires that each contractor "...maintain and have available for inspection records or other information which will disclose the impact which its...selection procedures have upon the employment opportunities of persons by identifiable race, sex, or ethnic groups..."²

Contractors with 100 or more employees³ are more specifically required by 41 CFR 60-3.15A(2) to maintain and have available records for each job on applicants, hires, promotions and terminations (as well as any other selection decisions) by sex and by each minority group for whom EEO-1 reporting is required. These records must be sufficient to disclose the impact of the selection process on women and on each minority group for each job. Contractors are then required to conduct adverse impact analyses for women and for each minority group that constitutes 2% or more of the relevant

²Such identifiable groups are defined by 41 CFR 60-3.4(B) as those groups for whom EEO-1 reporting is required—i.e., African Americans, Hispanics, Asian/Pacific Islanders, American Indians/Alaskan Natives—along with Whites and totals.

³Contractors with fewer than 100 employees must maintain the records identified in 41 CFR 60-3.15A(1)—e.g. the number of applicants and persons hired, promoted and terminated by sex and by each minority group which constitutes 2% or more of the labor force in the relevant labor area. Such small employers are not required to conduct adverse impact analyses of these data.

labor area or of the applicable internal workforce. Where a contractor determines that a selection process has an adverse impact, evidence of validity, as described in 41 CFR Part 60-3 must also be maintained and made available for review during a compliance evaluation by OFCCP.

(2) General Record Retention Requirements

The general record retention regulations at Section 60-1.12(a) are applicable to all contractors covered by Executive Order 11246, as amended (except those exempted under 41 CFR 60-1.5). As such, contractors are required to retain any personnel or employment record made or kept by the contractor, including records pertaining to hiring, applications and resumes, tests and test results, and interview notes. Contractors with at least 150 employees and a Government contract of at least \$150,000 must keep such records for not less than two years from the date a record is made or the date of the personnel action it concerns, whichever occurs later. Contractors that employ fewer than 150 employees and/or that do not have a Government contract of at least \$150,000 must keep such records for a period of one year.

(3) Affirmative Action Record Keeping Requirements

Those contractors required to develop a written affirmative action program (i.e. those with at least 50 employees and at least one contract valued at \$50,000), must also collect and maintain information related to recruitment and hiring processes. They must also analyze their hiring practices for the past year, including recruitment sources (41 CFR 60-2.17(b), (c), (d)). Additionally, they must compile and maintain support data for the analyses performed in the development of the Affirmative Action Program. Applicant flow⁴ data should include applicants identified through the Internet, as well as more traditional recruitment sources.

Compliance Requirements Related to AJB

Based on these requirements, we concluded there are three major outstanding compliance requirement areas associated with OFCCP enforcement that have not been resolved in the current version of AJB.

- (1) The AJB should include instructions to employers informing them of their record keeping obligations, and the need to conduct adverse impact analyses when applicable.

⁴Applicant flow log is defined in Chapter 1 of the Federal Contract Compliance Manual as a “chronological compilation of applicants for employment or promotion, showing the persons categorized by race, sex, and ethnic group, who applied for each job title ...during a specific period.”

- (2) We found that federal contractors who are using the AJB must go through a series of steps in order to collect the demographic information required for each stage of their applicant search. The process for retrieving the information is not user friendly. First the employer must send a written letter to the AJB service center in New York, specifying its search criteria and requesting the pertinent data for each search it has conducted, then the service center normally takes several weeks to send a written reply to the employer.

With over 100,000 supply and service contractor establishments who may fill dozens, or even hundreds, of job vacancies each year, this system clearly is not efficient and will become an even greater problem in future years. Also, we note that in addition to the Federal contractors for whom OFCCP has responsibility, there are millions of other business that are not Federal contractors but are subject to the Uniform Guidelines on Employee Selection Procedures. These business are also required to maintain the required record keeping information.

We believe that this retrieval system is also inadequate to meet the compliance needs of OFCCP when conducting an evaluation. They would be faced with the same challenges as the employer in attempting to retrieve the required data in order to verify adverse impact in the selection process.

- (3) The electronic tear-off sheet that includes the request for the demographic information of race, sex and disability status is at the conclusion of the resume process, and does not encourage users to provide pertinent information. The request for information on veteran status is a mandatory field at the beginning of the job seeker's resume posting process. All of the demographic information should be presented together and job seekers should be encouraged to provide the information.

**(B) Office of the Assistant Secretary of Administration and Management
Civil Rights Center**

The Civil Rights Center (CRC) is a component of the Office of the Assistant Secretary of Administration and Management. CRC enforces several Federal statutes and regulations that: (1) prohibit discrimination in DOL funded programs and activities and (2) prohibit discrimination on the basis of disability by certain public entities and in DOL assisted activities. CRC enforces DOL policies, practices, and procedures under Title VI of the Civil Rights Act of 1964, Title II of Americans with Disabilities Act of 1990, Section 504 of the Rehabilitation Act of 1973, Section 508 of the Rehabilitation Act of 1973, Age Discrimination Act of 1975, Title IX of the Education Amendments of 1972, Section 188 of the Workforce Investment Act of 1998, Executive Order 13160, and Executive Order 13166.

CRC is involved in the continuing development and implementation of AJB to ensure that neither AJB nor its users (e.g., United States Employment Service), discriminate on a prohibited basis, and that all job seekers have equal access to AJB.

Compliance Requirements Related to AJB

CRC identified several areas of concern similar to those listed above for OFCCP – such as record keeping needs of all employers, demographic information on applicants. In addition to those issues we note one additional outstanding concern in AJB that falls under the purview of the CRC—the lack of access that non-English speaking applicants have to the system. These applicants are referred to as Limited English Proficient.

In 1998, CRC urged ETA to accommodate potential AJB users who have Limited English Proficiency (LEP), based on the requirements of Title VI of the Civil Rights Act of 1964. Also, Executive Order 13166 (EO 13166), signed in August 2000, further emphasized the importance of this accommodation.

Anything a federal agency does, including all contact with the public, falls within the scope of the term federally assisted programs or activities. The definition of federally assisted programs or activities used under EO 13166 is consistent with the definition provided under the regulations for application of Section 504 of the Rehabilitation Act of 1973. EO 13166 requires all federal agencies take reasonable steps to provide meaningful access to their own federally assisted programs or activities.

ETA has made attempts to integrate LEP standards in ACK/AJB since 1998. ETA, in conjunction with the Interstate Conference of Employment Security Agencies/National Association of State Workforce Agencies, identified problems that existed in providing services to LEP individuals at both the national and state levels through the Public Electronic Labor Exchange initiative, known as PELEX. Several options were discussed in meetings between CRC and ETA. ETA made a substantial effort to address this issue through the implementation of the *Babblefish* language translation software—a translation service that removes language barriers across the World Wide Web, which was added to previous versions of the National AJB site. Unfortunately, ETA determined that *Babblefish* was problematic because it could not translate “dynamic” web pages (e.g., if an LEP job-seeker was to enter a resume into the system in a language other than English, access to the resume would be limited. The resume would only be translated and accessed if an employer was searching the website in the language that the resume was entered).

As of the date of this report, ETA has reactivated *Babblefish* until a system called Websphere is implemented in the 2002 AJB update. Both ETA and CRC anticipate that implementation of Websphere will resolve the LEP issue.

(C) The Veterans' Employment and Training Service

The Veterans' Employment and Training Service (VETS) is charged with the responsibility to assist veterans, reservists, and National Guard members in securing employment, including the rights and benefits associated with employment, through existing programs, the coordination and merger of programs, and the implementation of new programs. In addition to other responsibilities, the VETS resolves claims by veterans, reservists, and National Guard members under the Uniformed Services Employment and Reemployment Rights Act, and investigates alleged veteran preference violations. Additionally, they provide employment and training services to eligible veterans through grants to States, local governments, and non-profit agencies. VETS are mandated to provide services as outlined in Title 38 of the United States Code (USC) Chapter 41 sections 4101, 4102 and 4212, as well as, 20 CFR Chapter IX Part 1000-1009.

Compliance Requirements Related to AJB

- (1) Demographic information on AJB does allow job seekers to self-identify as a veteran. However, VETS, in accordance with 5 USC Sec. 2108, requires that job seekers be allowed to further self-identify as Campaign Badge Veterans. This sub-category has not been included on AJB. In August 2001, ETA provided documentation that outlined its plan to add this sub-category to its next AJB version, scheduled for September 2001.
- (2) ETA has completed the process of creating a demographic historical database and has provided a physical demonstration of the database to VETS. However, no written instructions have been provided to potential users on how to utilize the database.

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Recommendations

We recommend that ETA:

4. ETA, with EEO enforcement agencies, must take a proactive approach to ensure that DOL regulatory requirements associated with data collection and impact analysis are available to employers using AJB.
5. ETA should coordinate with DOL enforcement agencies (OFCCP, CRC, VETS) to identify how they can assist employers in meeting their EEO and Affirmative Action record keeping responsibilities.
6. ETA and EEO enforcement agencies together should: (a) determine where the electronic tear-off sheet should be inserted during the registration process in order to obtain the highest response rate, and (b) revise the instructions for the tear-off sheet to encourage job seekers to provide demographic information needed.
7. Provide access to AJB for limited English-proficient job seekers, in accordance with Executive Order 13166.
8. Incorporate the sub-category of Campaign Veterans to AJB self-identification section.
9. Develop and disseminate written instructions on the use of the historical demographic database, including information on the potential capabilities of the database.

AGENCY RESPONSE AND OIG CONCLUSIONS

ETA's Response to Executive Summary

- **Finding 1 - The Overall Effectiveness of America's Job Bank is Difficult to Assess**

"We still believe that this should be reworded. This issue is not confined to America's Job Bank, but is a generic problem inherent in all web-based, self-service systems. This title makes it sound as though other such systems have addressed and resolved these issues, while AJB has done nothing. This is not the case. While it is true that the current performance measures used in conjunction with AJB don't focus on outcome measures, we have met or exceeded the measures that have been used. The substantive issue that needs to be addressed is that there are no generally accepted performance measures for web-based self-service systems, and those used for staff-assisted do not fit and cannot be used. To be fair, AJB has been a leader in trying to address this issue."

OIG Conclusion for Executive Summary

We believe our conclusion that the overall effectiveness of America's Job Bank is difficult to assess is accurate. This conclusion is based on evidence that usage is difficult to determine, existing performance measures do not adequately address web site utility, and there are concerns regarding customer service issues. We do not believe that one can infer from the title that other systems have addressed and resolved these issues while AJB has done nothing. Based on this, we are leaving the title of Finding One as written.

FINDING ONE RECOMMENDATIONS

RECOMMENDATION ONE

ETA's Response Recommendation One:

- **Recommendation 1: Conduct an on-line survey of America's Job Bank web site users in order to determine the factors contributing to web site usage. Specifically:**
 - A. On visiting the AJB web site, include a "pop-up" window which informs visitors that a customer satisfaction survey is in progress, and should they be willing to participate, an email survey will be sent to them. Anonymity can be maintained through requiring only an e-mail address to send the survey.**
 - B. Design the survey in HTML format, or provide an HTML link in the email. This provides potential "interviewees" two opportunities to decline participation. The HTML format allows individuals to complete the survey and**

electronically “send” the information to appropriate data collection officials in a form readily convertible to spreadsheet or statistical software.

C. Include questions which specifically target factors influencing site usage. For registered users, include a battery of questions that address reasons for registering on the site. Areas for assessment should minimally include the following questions:

- (1) How did the individual find out about AJB?**
- (2) What are the individual’s demographic characteristics?**
- (3) How easy to use did the individual find the site?**
- (4) How helpful was the site in finding appropriate job listings?**
- (5) Would the individual use the AJB web site again?**
- (6) Has the individual used commercial self-directed employment sites?**
- (7) How does the AJB site compare to commercial sites?**
- (8) Did the individual find a job based on information viewed on the AJB site?**

"We do not agree with this recommendation. Doing an on-line survey is very expensive and time-consuming and feel that there are better and less costly ways to gain this same type of information, namely focus groups, e-mail feedback and other means of user input. Again, it makes little sense to spend more money to determine a customer's satisfaction with a service, than it does to provide the service itself."

OIG Conclusion

We consider this matter unresolved. In order to attain the goal of "becoming a market leader in self-directed employment services," ETA must be able to determine: (1) how useful individuals find the material on the AJB web site; and (2) how satisfied individuals were with various service aspects (e.g., support, troubleshooting). Site utility and customer service should therefore be paramount concerns. ETA should make concerted efforts to further study these items. While we believe that a web survey is the best option considering the costs and benefits, we acknowledge that other avenues for obtaining this information are equally valid. To this end, ETA should provide a plan detailing their proposed actions. The plan should include: (1) details of the approach to be used (e.g., phone survey, mail survey, focus group, sample size, etc); (2) strategies for addressing concerns listed in Recommendation 1:C(1)-C(8); (3) a copy of the data collection instrument (survey or interview questions, interviewer protocol); and (4) a project timeline. This plan should be submitted to this office no later than December 17, 2001.

RECOMMENDATION TWO

ETA's Response to Recommendation Two

- **Recommendation 2: Review Workforce Investment Act performance measures and other industry initiatives for the purpose of developing applicable *outcome* performance measures.**

"As pointed out in our previous comments to your office, self-service systems are exempted from the core WIA performance measures. However, we agree with your recommendation as it has been rewritten and have already begun work on this recommendation."

OIG Conclusion

We consider this recommendation to be resolved. It will be closed upon receipt of a status report to this office by December 17, 2001, indicating actions taken to date and planned future actions.

RECOMMENDATION THREE

ETA's Response to Recommendation Three

- **Recommendation 3: Gather customer satisfaction data regarding America's Career Kit/America's Job Bank customer service.**

"We agree with this recommendation, although it lacks specificity. We need to begin work on determining what type of customer satisfaction data is relevant to the electronic tools."

OIG Conclusion

We consider this recommendation to be resolved. It will be closed upon receipt of a status report to this office by December 17, 2001, indicating specific determinations regarding relevant customer service data, actions taken to obtain this data, and planned future actions.

FINDING TWO RECOMMENDATIONS

RECOMMENDATION FOUR

ETA's Response to Recommendation Four

- **Recommendation 4: ETA, with EEO enforcement agencies, must take a proactive approach to ensure that DOL regulatory requirements associated with data collection and impact analysis are available to employers using AJB.**

“It is not appropriate for ETA or AJB to advise employers of an OFCCP regulatory requirement. Per the February 22, 2000 agreement, we agreed to provide a link to an OFCCP web page and label it ‘... to find out more about your responsibilities as a Federal Contractor, click here.’ That link exist today in the employers’ registration process, and comes up whenever a registering employer self-identifies as a federal contractor. We believe this effectively addresses this issues. We believe we have met the spirit of this finding and it should be removed”.

OIG Conclusion

We consider this recommendation unresolved. ETA should notify OFCCP in writing that OFCCP is to ensure that information provided in their link is current and adequately addresses record-keeping responsibilities of Federal Contractors. In order to close the recommendation, ETA should submit to this office a copy of their correspondence to OFCCP and the response received from them by December 17, 2001, detailing the proposed actions to be taken.

RECOMMENDATION FIVE

ETA’s Response Recommendation Five

- **Recommendation 2: ETA should coordinate with DOL enforcement agencies (OFCCP, CRC, VETS) to identify how they can assist employers in meeting their EEO and Affirmative Action record keeping responsibilities.**

“We agree with this recommendation, and have launched an effort to identify how we can assist employers to meet their EEO and Affirmative Action record keeping responsibilities called the EEO/AA Tools Workgroup. Participating in this effort are representatives from OFCCP, Equal Employment Opportunity Commission, Civil Rights Center, and VETS.”

OIG Conclusion

We consider this recommendation to be resolved. It will be closed upon receipt of a status report to this office by December 17, 2001, indicating actions taken to date and planned future actions.

RECOMMENDATION SIX

ETA’s Response Recommendation Six

- **Recommendation 6: ETA and EEO enforcement agencies together should: (a) determine where the electronic tear-off sheet should be inserted during the registration process in order to obtain the highest response rate, and (b) revise the instructions for the tear-off sheet to encourage job seekers to provide demographic information needed.**

“We don’t believe that moving the tear-off sheet to the beginning of the process will increase the response rate, but agree to look in to what location would provide the best response rate. However, there is a cost associated with moving this information in AJB, and we would object to moving it back to the end of the process if the move to the front of the process netted poorer results. In addition, the language to “encourage” job seekers to provide the demographic information was provided by the enforcement agencies requesting the information, we are not opposed to changing the language if they provide us with language they think would better suit this purpose.”

OIG Conclusion

We consider this recommendation to be resolved. ETA, in conjunction with EEO enforcement agencies, should determine the most effective placement for the electronic tear off sheet. ETA should also request in writing that appropriate EEO enforcement agencies review existing language to encourage job searches to provide demographic information and provide an update to ETA if necessary. Please submit a status report outlining the actions taken by ETA by December 17, 2001.

RECOMMENDATION SEVEN

ETA’s Response Recommendation Seven

- **Recommendation 7: Provide access to AJB for limited English-proficient job seekers, in accordance with Executive Order 13166.**

“ It should be noted that the free online translator operated by Alta Vista known as Babel Fish, which was previously on the AJB website, has been reactivated and is currently available for translation services. It was taken down when we decided to implement a better solution to the problem using our new enterprise software from IBM called Websphere which includes intrinsic support for multiple languages. However, it is taking longer to implement Websphere than originally planned, so that Alta Vista option has been reactivated and will remain on the web site until Websphere can be fully implemented. “

OIG Conclusion

We consider this recommendation to be resolved. It will be closed when ETA provides information to this office on IBM’s Websphere enterprise software. The information should be provided no later than July 16, 2002.

RECOMMENDATION EIGHT

ETA's Response to Recommendation Eight

- **Recommendation 8: Incorporate the sub-category of Campaign Veterans to AJB self-identification section.**

“We agree with this recommendation. Per our agreement with the VETS, the Campaign Veterans category will be added in the September release. However, there is the following point of clarification; the veterans’ information is not currently part of the “electronic tear-off sheet” and will not be in the September release. It is kept separate format the other information, as we are required by the law to ask about veteran status and collect this information, but we do not have th authority to require the collection of demographic information.”

OIG Conclusion

We consider this recommendation resolved. It will be closed when the update is complete and such action is reported to this office no later than December 17, 2001.

RECOMMENDATION NINE

ETA's Response to Recommendation Nine

- **Recommendation 9: Develop and disseminate written instructions on the use of the historical demographic database, including information on the potential capabilities of the database.**

“We are assuming that since you removed ‘interested parties’ from this recommendation per our last round of comments that you are referring to the enforcement agencies. If this is the case we believe that we have already provided this information to the enforcement agencies, but we can repeat this demonstration, in necessary, as well as provide a written memo documenting the procedures. If this assumption is incorrect, and a broader audience is intended, we don’t agree with this recommendation.”

OIG Conclusion

We concur with ETA’s proposed action and consider the recommendation to be resolved. It will be closed when ETA provides information regarding the demonstration presentation and written procedures. Please provide the information no later than December 17, 2001.

**APPENDIX
COMPLETE AGENCY RESPONSE**



SEP 17 2001

MEMORANDUM FOR: WILLIAM H. PICKLE
Assistant Inspector General
Office of Communications, Inspections and Evaluations

FROM: EMILY STOVER DEROCCO
Assistant Secretary
Employment and Training Administration *Emily Stover Derocco*

SUBJECT: Comments in Response to the Official Draft Report on the
Evaluation of America's Career Kit (No. 2E-03-390-0002)

Attached are our written comments in response to the official draft report of your evaluation of the Employment and Training Administration's (ETA) development and implementation of America's Career Kit.

While you considered and incorporated many of our comments to the preliminary draft report into this official draft, we have attached some additional comments for your consideration and inclusion in the final report.

I again appreciate the opportunity to provide you with these comments and hope you will take them into consideration in your final report. If you have any questions, please do not hesitate to contact David Morman of my staff at (202) 693-3691.

Attachment



A Proud Member of America's Workforce Network

Comments on Official Draft Report on the
Evaluation of America's Career Kit (No. 2E-03-390-0002)

1. Executive Summary, page iii, Finding 1: "The Overall Effectiveness of America's Job Bank is Difficult to Assess." We still believe that this should be reworded. This issue is not confined to America's Job Bank, but is a generic problem inherent in all web-based, self-service systems. The title makes it sound as though other such systems have addressed and resolved these issues, while AJB has done nothing. This is not the case. While it is true that the current performance measures used in conjunction with AJB don't focus on outcome measures, we have met or exceeded the measures that have been used. The substantive issue that needs to be addressed is that there are no generally accepted performance measures for web-based self-service systems, and those used for staff-assisted do not fit and cannot be used. To be fair, AJB has been a leader in trying to address this issue.
2. Executive Summary, page iii, first paragraph under Finding 1: "However, since August 1999, the number of server accesses ("web hits") has steadily decreased." "Web hits" are a notoriously poor measure for gauging performance. Hits represent the number of server accesses in loading a web page. Depending on how the page is constructed, this number can vary tremendously over time as new versions and more efficient code is developed and implemented. We previously pointed out two blips in the graph representing just such occurrences in AJB and subsequently provided the OIG additional statistical information about AJB performance over time, showing the number of user sessions and the number of job and resume searches, which we believe are much better indicators of the usage of the AJB web site. Both of these indicators showed growth over the previous year.
3. Executive Summary, page iv, second paragraph: "ETA has conducted a study of employer satisfaction, but job seeker customer service has received significantly less attention." This is incorrect. Focus groups and analysis of e-mail feedback was performed for both job seekers and employers, not just employers. We believe that the review team came to this conclusion because of the studies that we provided to them. We had actually paid for some research on the employer customer, because we believed that the AJBSC had over focused on feedback from the job seeker customer. We suggest the OIG interview staff at the AJB Service Center to determine the steps that they routinely take to identify customer satisfaction and user feedback, particularly from job seeker customers.
4. Executive Summary, page iv, first bullet under Finding 2: "Nevertheless, as the coordinator of the AJB in DOL, ETA must facilitate the process with OFCCP." It has always been ETA's position that the responsibility for advising employers how to comply

with an OFCCP regulatory requirement was OFCCP's responsibility. Per the February 22, 2000 agreement, we agreed to provide a link to an OFCCP web page and label it "... to find out more about your responsibilities as a Federal Contractor, click here." That link exists today in the employers' registration process, and comes up whenever a registering employer self-identifies as a federal contractor. We don't know how we could facilitate this process any further.

5. Executive Summary, page iv, second bullet under Finding 2: There are procedures in place to allow employers and EEO agencies a way to retrieve the demographic information on searches they conducted in AJB. A letter is sent to the AJB Service Center stating the date and time of their search and the search criteria used. The search is re-created on the historical database, and the information they need on applicant profiles is retrieved and forwarded to them. To ensure the security of this very private information, the database that contains characteristic and demographic data must be kept off-line. We can work with the enforcement agencies to develop a better process, but they must realize that because this sensitive data has to be kept off-line, it will never be able to be retrieved at the point of the actual search (i.e., real-time).
6. Executive Summary, page v, fourth bullet under Finding 2: "Limited English-proficient job seekers cannot effectively access AJB." It should be noted that the free online translator operated by Alta Vista known as Babel Fish, which was previously on the AJB web site, has been reactivated and is currently available for translation services. It was taken down when we decided to implement a better solution to the problem using our new enterprise software from IBM called Websphere which includes intrinsic support for multiple languages. However, it is taking longer to implement Websphere than originally planned, so the Alta Vista option has been reactivated and will remain on the web site until Websphere can be fully implemented.
7. Executive Summary, page v, Recommendations, first bullet: We do not agree with this recommendation, as it is very vague in its purpose of determining "factors contributing to web site usage." Doing an on-line survey is very expensive and time-consuming and we feel that there are better and less costly ways to gain this type of information, namely focus groups and other means of user input.
8. Executive Summary, page v, Recommendations, second bullet: As pointed out in our previous comments to your office, self-service systems are exempted from the core WIA performance measures. However, we agree with your recommendation as it has been rewritten and have already begun work on this recommendation. One of the NET Board's three strategic goals is for the ACK web sites to be "market leaders." In this regard, we are working to identify the metrics that can be used to define the term "market leader." We will then benchmark the marketplace using those metrics and applying the results to our web sites. While these measures may not equate to WIA outcomes, they should provide a sense of the value of the web site to the public. Further, ETA is also already funding a survey designed to estimate employment outcomes associated with using AJB.

9. Executive Summary, page v, Recommendations, third bullet: We agree with this recommendation, although it lacks specificity. We need to begin work on determining what type of customer satisfaction data is relevant to the electronic tools.
10. Executive Summary, page v, Recommendations, fourth bullet: We believe we have already met the spirit of this recommendation, as discussed in comment number 4. We believe this recommendation should be removed.
11. Executive Summary, page v, Recommendations, fifth bullet: We agree with this recommendation, and have already launched an effort to identify how we can assist employers to meet their EEO and Affirmative Action record keeping responsibilities called the EEO/AA Tools Workgroup. Participating in this effort are representatives from OFCCP, EEOC, Civil Rights Center, and VETS.
12. Executive Summary, page v, Recommendations, sixth bullet: We don't believe that moving the tear-off sheet to the beginning of the process will increase the response rate, but agree to look into what location would provide the best response rate. However, there is a cost associated with moving this information in AJB, and we would object to moving it back to the end of the process if the move to the front of the process netted poorer results. In addition, the language to "encourage" job seekers to provide the demographic information was provided by the enforcement agencies requesting the information; we are not opposed to changing the language if they provide us with language they think would better suit this purpose.
13. Executive Summary, page v, Recommendations, seventh bullet: Agree. Per comment number 6, Babel Fish is back on the site and will remain on it until such time as the Websphere technology can be fully implemented.
14. Executive Summary, page v, Recommendations, eighth bullet: Agree. Per our agreement with the VETS, the Campaign Veterans category will be added in the September release. However, there is the following point of clarification; The veterans' information is not currently part of the "electronic tear-off sheet" and will not be in the September release. It is kept separate from the other information, as we are required by law to ask about veteran status and collect this information, but we do not have the authority to require the collection of demographic information.
15. Executive Summary, page v, Recommendations, ninth bullet: We are assuming that since you removed "interested parties" from this recommendation per our last round of comments that you are referring to the enforcement agencies. If this is the case, we believe that we have already provided this information to the enforcement agencies, but we can repeat this demonstration, if necessary, as well as provide a written memo documenting the procedures. If this assumption is incorrect, and a broader audience is intended, we don't agree with this recommendation.

16. Background, page 2, (2) America's Learning eXchange and (3) America's Career InfoNet: The descriptions for these two remained the same from the previous draft and are still not wholly accurate or are incomplete. A fact sheet describing each component is attached again, for your information.
17. Background, page 2, Bar Chart: While some corrections were made to this chart, it still requires some additional clarification/edits. It should be noted that the \$1.5 million for AJB in PY 1997 came from the ES budget, not the ALMIS budget. In addition, no PY 2001 funds have been released to AJB yet. Although a release of funds to AJB is currently in process, only \$22 million will be released, not the entire \$28 million budgeted as currently depicted on the chart. In its current form, the chart overstates what has been allocated to AJB. This can be corrected in one of two ways. Either the PY 2001 data could be dropped from the chart entirely, which may be appropriate, since the evaluation only covers PY 1997 through PY 2000, according to the first paragraph of the Executive Summary. Or a footnote can be added to the chart that \$42.5 million and \$28 million for the ACK and AJB respectively is the budgeted funding levels, but have not been allocated and invested in the products to date.
18. Purpose, Scope and Methodology, page 3, Methodology, Qualitative Methods: While it is now clear that staff from the America's Job Bank Service Center were not interviewed, we believe that they should have been. AJB is operated by the Service Center through a grant to the State of New York, it is not a "federal labor market information system."
19. Purpose, Scope and Methodology, page 3, Methodology, Quantitative Methods: The corrected OIG report refers to "(1) frequency counts of server accesses ("web hits") over a 32-month span" as data provided by the Service Center. It doesn't refer to the additional, more accurate information (the number of AJB user sessions in the same quarter in PY1999 and in PY2000 and the number of job and resume searches that were conducted in PY1999 and in PY2000) that were also provided. Server accesses are not a good or consistent measure for gauging site usage, as navigation improvements in new versions of the site tend to reduce server accesses dramatically. We hope that you will use this additional, more accurate and more definitive information in drawing your conclusions.
20. Purpose, Scope and Methodology, page 4, Methodology, Document Review: In the second sentence America's Career InfoNet is improperly referred to as "America's Career O*Net."
21. Findings and Recommendations, Finding 1: To more accurately reflect the situation, we recommend rewording this finding, as per comment number 1.
22. Findings and Recommendations, page 5, paragraph 3: Just as in comment number 3, the statement "job seeker customer service has received significantly less attention" is incorrect. As stated before, focus groups and analysis of e-mail feedback was performed for both job seekers and employers, not just employers. Once again, we suggest that had

- the OIG interviewed staff at the AJB Service Center they would have heard about the steps that they routinely take to identify customer satisfaction and user feedback, particularly from job seeker customers.
23. Findings and Recommendations, page 5, paragraph 3: In the last sentence, there are two items that were overlooked. The term "casual" should be replaced by "anonymous" as was done in other parts of the paper, per our last round of comments and the "(who account for the majority of site visits)" should be deleted, as was done elsewhere, per our previous comments that this statement is unsubstantiated.
 24. Findings and Recommendations, page 6, paragraph 2: As stated in comment number 2, changes in the number of hits usually reflect changes in how the web site is structured, rather than how often it is used. As the previous sentence gives a picture of site utilization, we would recommend deleting the "Conversely, since August 1999, the number of server accesses ("web hits") has steadily declined," as it adds no real value to the site utilization discussion, it only confuses it.
 25. Findings and Recommendations, page 6, paragraph 2: The second to last sentence in the paragraph states, "Nonetheless, ETA officials acknowledge that growth in usage of the AJB web site has not kept pace with the number of available positions." Not only do ETA officials not acknowledge this point, it is unclear what point this sentence is trying to make. It needs to be rephrased along with the last sentence which seems to be related to the previous sentence, as the point that you are attempting to make is unclear.
 26. Findings and Recommendations, page 6, Figure 2: This graph should be deleted, per comment number 24, or changed to show AJB visits as discussed in the first sentence of the paragraph above it.
 27. Findings and Recommendations, page 7, paragraph 4: You incorporated our comments and changed the sentence "in some cases, it may require navigating as many as six to eight screens before a specific job search result can be retrieved" to "AJB's information architecture currently requires four or five clicks, depending on the specificity of the search and the options chosen", based on the AJB implementation of a new look and feel in a release that went live last December. However, you fail to mention that the AJB used the information in the evaluation and usability studies you referred to, to develop the new version and will be using them further to guide additional changes in the future.
 28. Findings and Recommendations, page 8, last paragraph: While it is true that "Job seekers visiting a One-Stop have access to core services provided by ACK through the Internet.", you still fail to mention that since AJB is on the Internet, many users can access and use the services without ever going to or registering with a One-Stop Center. If they do not have access to a computer at home, they do so through libraries, community centers, or churches.

29. Findings and Recommendations, page 9, first paragraph (after bullet list): The last sentence states "..., ETA should **utilize** WIA reporting requirements for the purpose of developing applicable outcome performance measures." While these reporting requirements should be taken into account in developing applicable performance measures, we believe utilize is too strong a word. As pointed out before, self-service and information services are specifically exempted from the cited measures and applicable measures for these activities might be quite different from WIA reporting requirements.
30. Findings and Recommendations, page 9, second paragraph (after bullet list): The first sentence says "These performance measures certainly address some aspects of self-directed employment services, as they will **primarily** be provided through the One-Stop system." We don't know of any data that would validate this assertion. As per comment number 28, ACK/AJB services are available anywhere access to the Internet is available.
31. Findings and Recommendations, page 10, second paragraph (after bullet list): The first sentence indicates that "previous evaluation of 'customer satisfaction' with regard to AJB has been completed, but job seeker satisfaction has played a limited role." This is inaccurate as per our previous comments number 3 and 22.
32. Findings and Recommendations, page 10, second paragraph (after bullet list): The third sentence indicates that "As a majority of the program's impact is derived from job seekers...". There is no data that would validate this assertion; in fact, many states would argue that AJB has as great (or even greater) an impact on the employer community.
33. Findings and Recommendations, page 11, first paragraph: This paragraph restates the inaccurate information that was just discussed in the two previous comments.
34. Recommendations for Finding 1, page 12, Recommendation 1: We do not agree with this recommendation, as per comment number 7. Doing an on-line survey is very expensive and time-consuming and we feel that there are better and less costly ways to gain this same type of information, namely focus groups, e-mail feedback and other means of user input. Again, it makes little sense to spend more money to determine a customer's satisfaction with a service, than it does to provide the service itself.
35. Recommendations for Finding 1, page 12, Recommendation 2: As pointed out in our previous comments to your office, self-service systems are exempted from the core WIA performance measures. However, we agree with your recommendation as it has been rewritten and have already begun work on this recommendation, per comment number 8.
36. Recommendations for Finding 1, page 12, Recommendation 3: We agree with this recommendation, per comment number 9, although it lacks specificity. We need to begin work on determining what type of customer satisfaction data is relevant to the electronic tools.

37. Finding 2, page 13, second bullet: The last part of the sentence says current procedures are “awkward and time consuming.” While this may be the case, there are limits to the availability of the database that contains the characteristic and demographic data, as it must be kept off-line to protect this sensitive information from hackers. As per comment number 5, we can work with the enforcement agencies to develop a better process, but they must realize that because this sensitive data has to be kept off-line, it will never be able to be retrieved at the point of the actual search (i.e., real-time) for security and privacy reasons.
38. Finding 2, page 13, fourth bullet: Not entirely true; Babel Fish is available once again, per comment number 6 and 13.
39. Compliance Requirements Related to AJB, page 16, bullet (1): Per comment numbers 4 and 10, it is not appropriate for ETA or AJB to advise employers of an OFCCP regulatory requirement. Per the February 22, 2000 agreement, we agreed to provide a link to an OFCCP web page and label it “... to find out more about your responsibilities as a Federal Contractor, click here.” That link exists today in the employers’ registration process, and comes up whenever a registering employer self-identifies as a federal contractor. We believe this effectively addresses this issue.
40. Compliance Requirements Related to AJB, page 16, bullet (3): The first sentence ends with “... and does not encourage users to provide pertinent information.” Per comment number 12, the language to “encourage” job seekers to provide the demographic information was provided to AJB by the enforcement agencies. We are not opposed to changing the language if they provide us with language they think would better suit this purpose.
41. Compliance Requirements Related to AJB, page 16, bullet (3): “All the demographic information should be presented together and job seekers should be encouraged to provide the information.” It appears from this statement that you are saying the veterans and demographic information should be asked for all in one place. As explained in comment 14, the veterans’ information is not currently part of the “electronic tear-off sheet” and is kept separate from the other information, as we are required by law to ask about veterans status and collect this information, but we do not have the authority to require the collection of demographic information. The language used on the site to ask for demographic information was provided by the DOL enforcement agencies, and was not drafted by ETA or AJB, per comment numbers 12 and 40.
42. Findings and Recommendations, page 17, second paragraph: It should be noted that there are many other users of AJB, not just the United States Employment Service, as the paragraph seems to imply.
43. Findings and Recommendations, page 17, fifth paragraph: It should be noted that while AJB is a federally-assisted program funded by U.S. DOL, it is not run by the U.S. DOL.

The grant is administered for the State of New York by the America's Job Bank Service Center.

44. Findings and Recommendations, page 19, bullet (2): In the first sentence, there is a typo. One of the "ETA has completed the process of creating a demographic historical" should be deleted, as it is in the sentence twice.
45. Recommendations for Finding 2, Recommendation 1: We believe we have met the spirit of this finding and it should be removed. See comments number 4, 10 and 39.
46. Recommendations for Finding 2, Recommendation 2: We agree and have already begun to do so, per comment number 11.
47. Recommendations for Finding 2, Recommendation 3: We agree, with the caveats mentioned previously in comments number 12 and 40.
48. Recommendations for Finding 2, Recommendation 4: We believe we are already doing this, per comments number 6, 13 and 38.
49. Recommendations for Finding 2, Recommendation 5: We will be implementing the sub-category in the September release of AJB, but it will not be a part of the "electronic tear-off sheet", per comments number 14 and 41.
50. Recommendations for Finding 2, Recommendation 6: We agree to provide written instructions on the use of the historical database, per the caveat mentioned in comment number 15, that the written instructions are for enforcement agency distribution.