



TEXAS WORKFORCE COMMISSION
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GEORGE W. BUSH
Governor

July 14, 1999

Eric Johnson
Workforce Investment Act Implementation Taskforce
U.S. Department of Labor
200 Constitution Avenue, NW, Room S5513
Washington, DC 20210

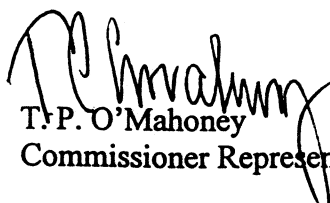
Dear Mr. Johnson:

I appreciate the opportunity to submit comments on Part 652, et al., Workforce Investment Act; Interim Final Rule. Although the Texas Workforce Commission submitted formal comments, I wanted to offer a recommendation regarding an issue that is of particular concern to dislocated workers.

§663.840 specifies that needs-related payment (NRP) levels for dislocated workers are set by the local board not to exceed the weekly level of the unemployment compensation benefit. Few local boards, however, set NRP levels comparable to weekly unemployment compensation benefits. Under the Job Training Partnership Act, this resulted in many dislocated workers who exhausted all unemployment compensation or trade readjustment assistance benefits finding that their income support dropped so significantly that completion of training was jeopardized. To maximize training completion for dislocated workers and to protect the expended public investment in these individuals, I suggest that the NRP and support services "package" be comparable to the weekly unemployment compensation amount.

Thank you for your consideration of this suggested change.

Sincerely,


T.P. O'Mahoney
Commissioner Representing Labor

cc: Joe Juarez, USDOL, Region VI Administrator