

Further Qs and As from DOL

Question: Where the employer has established a sub-account for an attorney or agent, is the attorney or agent permitted to submit applications on-line?

☞ Yes, attorney or agent may submit applications under the following circumstances. An employer must complete the registration process as explained at <http://www.plc.doleta.gov>, including the initial log-in. During the initial log-in, the employer will change the *employer's* temporary password (as assigned by the system during registration) and once logged-in, the employer can establish a sub-account for an attorney or agent. The employer will select a username for the attorney or agent, and the system will assign a temporary password. The attorney or agent will receive an e-mail with the username, temporary password, and the employer's PIN. When the attorney or agent logs in and changes the *attorney's* or *agent's* password, the attorney or agent is then permitted to complete and submit applications on-line on behalf of the employer using the PIN of the employer in whose name the application is being filed.

Question: Are there any circumstances under which mailing in a labor certification application would prove more successful than electronically submitting an application on-line?

☞ No, mailing-in an application will not prove more successful, as the mailed-in application, upon receipt at the National Processing Center, is date stamped. Until the application is data entered into the system by a data entry person (using the exact information shown on the form 9089), processing will not begin on the application. Once entered in the system, the mailed-in application receives the exact same automated analysis and manual scrutiny as an application submitted electronically. If there are two identical applications, one submitted electronically and one mailed-in, there will be no difference in how they are processed. The only difference will be in processing time; a mailed-in application will take longer, as not only mailing but also the data entry time will be involved. Remember: the on-line system will identify mistakes (e.g. entering four digits for a zip code instead of five digits) before allowing the application to be submitted, but the data entry person must enter the information exactly as shown on the application; a mistake on the form may trigger an audit or denial.

DOL also provided the following information:

To withdraw or delete a registration account (as in, a situation where the original registration was set up showing an attorney or representative as the "user" and/or where the contact person for the employer is not a person with actual hiring authority), please e-mail PLC.HELP@dol.gov, provide the user name and password and request the account be deleted. At that point, the person with actual hiring authority can re-register with the correct information.