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Submitted via email: ChiefEvaluationOffice@dol.gov

To whom it may concern,

Thank you for the opportunity for me to provide comments on the DOL Evl Apprenticeship Evidence-building Portfolio, New Collection submitted by the Chief Evaluation Office (CEO) of the U.S. Department of Labor (DOL), as described in the *Federal Register* on December 19, 2019.

As an assistant professor at Girard School of Business, Merrimack College, I study how public policies impact employees' labor market outcomes and career trajectories. I also am a member of the non-degree credential research network (NDCRN) at the George Washington Institute of Public Policy, George Washington University. I did my doctoral study at the University of Toronto, where I was exposed to the Canadian Apprenticeship Registration data and started looking in the longitudinal administrative data that linked education, apprenticeship training, and subsequent labor market outcomes. I intend to continue to examine the impact of apprenticeship primarily focus on the programs catered to adapt to industry 4.0 and the future of work. I learned this DOL data collection initiatives with our NDCRN connections. I think this would be the ideal data set that I can examine. I believe understanding better this part of training programs will lead to more effective policies to upskill the workers to meet the needs of the future business and economy.

In light of the importance of the data collection efforts, I support to collect the apprenticeship data and suggest the following information be collected as well:

- In the baseline survey, in addition to the question of the highest education, would it be possible to ask the sequence of their educational path?

For example, have the survey respondents been working full time in between two levels of education?

- Question C9 on pg. 11 asked whether the employer referred to the survey respondents to the specific program for training. Is this question the beginning of the training module? Can we ask the question about the intention to participate? Such as are you willing to participate in a specific program if the program is available? Do you plan to enroll in the specific program for a career change or upskilling required by the employer?
- Can we ask follow-up questions such as the length of the training, whether respondents receive release time to participate in training and the job tenure of the respondent?

- I noticed the LinkedIn question D8 on pg. 16. Will we be able to connect the LinkedIn profile to the survey data?
- I am curious about the section E in which staff will assess the likelihood of participation of a specific program or obtaining an industry-recognized credential. What type of information will the staff use to make such an assessment? I want to get more information.
- The interview guides are very detailed; hence, the interview would be extremely time-consuming. How much of the information can be obtained outside the interviews? In addition, I would like to know additional key features of the apprenticeship programs including the apprentices/journey person ratio, type of certificates (Certificate/License/Attestation and other short program credentials/Documentation of Achievement or Completion) awarded, whether those programs qualify for career, technical or pre-college, whether those programs are post career, technical or professional training programs, what language is used during the training, and whether the training is recognized in other states.
- For program participants, I am interested in the apprenticeship experience. For the starter, information about the discontinued program (canceled, suspended, or terminated) or transferred to another program, and the job hours completed for duration-based programs.
- A detailed description of the subsequent surveys was not provided at the moment. As for subsequent labor market outcomes, I would like to know whether the respondents are employed or self-employed and whether they are working in their trained field. I am also interested in whether they have participated in any additional training programs since the last survey.

I appreciated the opportunity to comment on the proposed Apprenticeship Evidence-building Portfolio, and I hope you find these thoughts helpful. I am eager to work on research using this valuable data source. Look forward to a written response.

Sincerely,



Tingting Zhang

02/14/2020