

# PUBLIC SUBMISSION

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## Submitter Information

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## General Comment

Credential Engines comments regarding document number: 2020-08067, publication date: 4/16/2020

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Credential Engine supports the proposed development of the National Training, Education, and Workforce Survey (NTEWS).

We offer a few comments here suggesting to expand the survey topics, to improve the interpretation of findings by coordinating credential references with the CTDL schema, and to build upon the supplemental sources of data provided via Credential Engines Registry.

Survey topics: Credential Engine has documented over 730,000 credentials being offered throughout America. The breadth of these offerings makes it challenging for the public to evaluate these options and make well informed enrollment decisions. As such, we recommend that NTEWS consider expanding its data collection topics to also include Americans credential information seeking behavior in order to help target career counseling and related outreach efforts. We believe this expansion is especially important in order to increase social mobility and promote more equitable outcomes. For example, Strada Education Networks Public Viewpoint: COVID-19 Work and Education Survey - Updated June 10, 2020 found that, compared to other racial and ethnic groups, black Americans rank advice about education and training from colleges and universities as less valuable than advice from

other sources. By including questions concerning this topic, NTEWS could provide consistent information about how the skilled technical workforce learns about credential offerings and how those offerings are evaluated relative to an enrollment decision. Credential Engine is particularly interested in using such data to ensure credential providers are providing the most helpful information about their offerings via the most effective channels.

Interpretation of findings: A founding purpose of Credential Engine has been to develop, maintain, and expand the openly-licensed Credential Transparency Description Language (CTDL) schema, which currently defines over 500 terms used to describe many aspects of credentials. Currently, CTDL is being used by government agencies across seventeen states to communicate credential offerings in their jurisdiction to the public. We recommend coordinating all credential terms used in the future NTEWS with the CTDL schema in order to help the research community better interpret survey findings and to facilitate analysis with the broad credential offering marketplace. For example, NTEWS respondents may fail to consistently interpret certifications and therefore over report instances of obtaining various training certificates used for compliance or regulatory purposes. We welcome additional discussion on how the CTDL schema could be used to improve the NTEWS design and also facilitate the interpretation of findings relative to the credential marketplace.

Supplemental sources of data: Credential Engine maintains a Registry of linked open data on all credential offerings, which could serve as a valuable supplemental source of data. Verified accounts can access data in the Registry via an API, an html widget, or via a bulk download. These data are also made available to the public via the demonstration website <https://credentialfinder.org/>. You can register via an account using the following linked quick start guide <https://credreg.net/quickstart/search>. We would welcome the opportunity to discuss how the hundreds of thousands of data points already available in the Registry concerning credentials of all types could supplement this research and potentially reduce respondents reporting burden.