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**Comment on the National Training, Education, and Workforce Survey (OMB control no. 3145-NEW)**

Dear Ms. Plimpton and Colleagues:

First of all, I want to emphasize that I **strongly recommend** that OMB allow the National Science Foundation to proceed with this information collection request. Even in its current form, the data it will generate will be of incredible value to the research community and provide insights necessary for policymakers to understand the extent and value of all types of credentials in the American workforce. The below suggestions are intended to help the National Center for Science and Engineering Statistics improve an incredibly valuable ICR as it prepares to finalize the survey instrument.

In many respects, the research community is looking to the NTEWS to carry on the work of the Interagency Working Group on Expanded Measures of Enrollment and Attainment (GEMEnA). Among the many accomplishments of GEMEnA was the creation and adoption of a common language across federal survey research programs for describing non-degree credentials (often referred to as “alternative credentials” in GEMEnA documents). I believe that it is vital for the NTEWS to carry forward as many of the indicators of credential attainment, quality and value that were adopted for the GEMEnA surveys as possible going forward to ensure that researchers will be able to identify longitudinal trends in the attainment and value of credentials. Therefore, the most urgent point that I would like to raise is that the **utility of the NTEWS could be maximized for the research community by importing more survey items from the Department of Education’s Adult Training and Education Survey (ATES) and NCSES’s National Survey of College Graduates (NSCG).**

Specifically, I encourage NCSES to explore the feasibility of adding the following items from the ATES and NSCG to the draft NTEWS survey instrument:

- ATES Item 15, parts A through D, Item 24, parts A through D, and Item 38, A through C. These items, which ask respondents to identify the perceived labor market value of their two most important certifications or licenses, provide essential measures of the utility of non-degree credentials. Including these items on the NTEWS would give researchers essential data points about whether the value of non-degree credentials changed for workers between 2016 and 2021, which may also help us to understand the relative value of credentials in a strong labor market relative to times of economic distress should the United States remain in a recession when the NTEWS is in the field.
- ATES Item 51, regarding labor union membership. Understanding the relationship between union membership and credential attainment in the skilled technical workforce could be extremely helpful to the Department of Labor as it explores options for upskilling the non-college workforce.
- NSCG (2019) Item A46, regarding the reasons that one pursued a particular certification or license. This should be repeated for each certification and license reported on the NTEWS. Asking this will provide useful insights regarding any differences in the motivations of the sub-

baccalaureate workforce for attaining non-degree credentials relative to peers who hold a college degree.

- NSCG (2019) Item A48, regarding whether an employer contributed to the cost of credential attainment. This should be asked for each certification and license reported on the NTEWS, and ideally would be modified to ask respondents to indicate the percentage of direct costs that were covered by their employer.
- NSCG (2019) Section C, all questions. These items extend beyond the attainment of non-degree credentials, but are vital for understanding the work-related context in which individuals choose (or do not choose) to pursue credentialing opportunities. While the receipt of employer-sponsored, non-credentialed training is an obvious alternative to earning a certification or license in some situations, it is also important to know how attendance at meetings and association membership is related to certification attainment.
  - I will also note that knowing more about association membership and meeting attendance in the sub-baccalaureate workforce is important for understanding patterns of occupational engagement and professional development within the skilled technical workforce. Having estimates from the sub-baccalaureate portion of the NTEWS sample to compare to the NSCG would provide data points on trends in association membership and meeting attendance that would be very valuable to professional societies in STEM and allied disciplines.

I also encourage the NCSES to reevaluate the response choices provided for Item 47, “Do you use this certification for your MAIN job?” Asking respondents to choose yes or no may not give researchers a full and accurate picture of the level of variation that exists in the use of non-degree credentials on-the-job. I suggest offering intermediate choices, which might include allowing individuals to describe how often they use knowledge from a credential: for example, responses could include “Every day,” “At least once a week, but not every day,” “Less than once a month,” and “Never.”

I also suggest asking whether each credential reported was obtained through distance learning or a hybrid online/in-person format. Collecting additional data points about the prevalence of distance learning within the skilled technical workforce would add to the evidence base used to justify the expansion of such programs, especially for workers from socioeconomically disadvantaged backgrounds.

Moreover, researchers would benefit from the addition of items about the extent to which all credentials respondents are asked to list on the NTEWS – degree or non-degree – were supported by employer tuition aid programs. Realistically, this could be asked as two part question – the first part asking if the respondent had access to tuition assistance benefits at work, and the second part asking if the respondent has used employer tuition assistance for any type of credential since starting at their current employer.

Finally, I also want to endorse the points made in the “consensus” letter signed by myself and members of the Non-Degree Credentials Research Network. Specifically, I want to encourage NCSES to plan for more aggressive dissemination and outreach activities with the research community than it has done in the past with its flagship surveys, such as the NSCG. NCSES also should be mindful of opportunities to gauge the competitiveness of the US skilled technical workforce relative to the workforces of other countries in its survey designs, which may include consulting with foreign statistical agencies to work toward common definitions of non-degree attainment. The 2022 Eurostat Adult Education Survey is probably among the most important surveys to review in this regard, though NCSES may wish to commission research examining how other countries are accommodating the rise of non-degree attainment in their programs of survey research.

To conclude, I would like to reiterate that the above recommendations – perhaps more of a wish list from a research perspective - are intended to stimulate efforts to improve the quality of the NTEWS survey instrument in the limited time remaining before the survey goes into the field. Regardless of NCSES's ability to implement these recommendations, I strongly recommend the **approval** of this information collection request.

Best regards,

Kyle W. Albert