

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue, Suite W18200
Alexandria, Virginia 22314

June 15, 2020

Dear Ms. Plimpton and Colleagues:

The undersigned members of the Non-Degree Credentials Research Network (NCRN), a project of the George Washington Institute of Public Policy (GWIPP) at George Washington University, wish to convey our **strong endorsement** of the planned information collection request (ICR) for the National Education, Training, and Workforce Survey (NTEWS), OMB control number 3145-NEW, proposed by the National Center for Science and Engineering Statistics (NCSES) of the National Science Foundation (per [85 FR 21271](#)).

We believe that the NTEWS promises to be an essential source of data on phenomena of serious interest to our research community, including the prevalence of credentials not captured in federal data sources related to college degrees, inequality in who attains such credentials, and the relationship between credential attainment and labor market outcomes such as salary and job satisfaction. Its longitudinal nature will also permit us to track whether attainment is increasing or declining over time, which will help policymakers understand the changing value of non-degree credentials in the overall labor market.

In addition, we think that the NTEWS also represents a promising transition on the part of the National Science Foundation away from focusing on the population of individuals who hold a baccalaureate degree in favor of recognizing the contributions to the American scientific and engineering enterprise made by skilled workers without a bachelor's degree. By doing so, NCSES is collecting data that will be needed to plan and evaluate potential new public policies that promise to increase the attainment of sub-baccalaureate credentials, including the Department of Labor's efforts to introduce Industry-Recognized Apprenticeship Programs and the expansion of Pell grants for short-term training programs. With this in mind, we encourage NCSES to continue to explore opportunities to improve our understanding of who is earning non-degree credentials and characteristics of those credentials. In particular, we encourage NCSES to:

- consider ways to add further depth to items about the attainment of credentials and other forms of training, including the extent of costs associated with earning credentials (be they out-of-pocket or covered by employers);
- expand the survey as much as possible to include items from the Adult Training and Education Survey not reflected in the current draft ICR (which might include items that ask individuals to rate the perceived value of their credentials) and the National Survey of College Graduates (for example, about individuals' job responsibilities and dimensions of job satisfaction); and

- investigate the compatibility of language used in survey items, especially concerning the definitions of different types of credentials, with those used by its international counterparts such as Eurostat so that the NTEWS can facilitate cross-national comparative research.

We commend NCSES for efforts that it has made already to engage in outreach with our research community and encourage continued collaboration with the many scholars and researchers who hope to use NTEWS data. To that end, we encourage NCSES to consider how it may engage in targeted outreach and training in the use of NTEWS public-use datasets. We suggest that the online data user community, e-mail list, conferences, and series of in-person trainings funded by the US Department of Education for researchers interested in the International Program for the Assessment of Adult Competencies (PIAAC) may be a model for this sort of outreach. We would be pleased to consult with NCSES about how it could engage in such an outreach strategy.

Thank you for the opportunity to comment on the draft NTEWS ICR. Again, **we strongly support** NCSES' development of the NTEWS and hope that NCSES finds our suggestions to be of interest and value.

On behalf of the undersigned members of the Non-Degree Credentials Research Network,

Kyle Albert
GW Institute of Public Policy, George Washington University

Stephen Crawford
GW Institute of Public Policy, George Washington University

Andrew Reamer
GW Institute of Public Policy, George Washington University

Tingting Zhang
Merrimack College

Jeff Strohl
Georgetown University

David Bills
University of Iowa

Deborah M. Seymour
Higher Education Innovation Consulting, LLC

Also co-signed by the following NCRN organizational participants:

Credential Engine

New America Education Policy Program

Education and Employment Research Center, Rutgers University

Concentric Sky, Inc.

Center for the Future of Higher Education & Talent Strategy, Northeastern University

Association for Career and Technical Education

Workcred, an affiliate of the American National Standards Institute