



Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
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Dear Ms. Plimpton and Colleagues:

Workcred, a non-profit affiliate of the American National Standards Institute, with a mission of to strengthen workforce quality by improving the credentialing system, ensuring its ongoing relevance, and preparing employers, workers, educators, and governments to use it effectively, would like to provide the following comments 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 interest to Workcred, 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 offer comments to NCSES to clarify the questions and terminology used in the survey. In particular, we encourage NCSES to consider the following comments on specific survey questions:

Question #13

The question states "...what are your most important duties or activities." We suggest making the language in the question consistent with the header located about the answer box. Either use "activities

and duties” or “activities or duties.” Also, NCES might consider adding a drop-down menu of example activities and/or duties to help the survey respondent appropriately complete the survey.

Question #14

NCES might consider adding “social and cultural working environment” as an additional answer choice. For many people, it is the social and cultural working environment that cause dissatisfaction with their job.

Question #18

NCES might consider updating the examples used in question #18 to make them more aligned with what the question is asking. Examples of business or industry could include: Education, IT services, Residential Construction.

Question #20

This question is the same as question #18. We suggest that it be deleted.

Question #22

Workcred suggests that the answers grouped together in the “other category” be separated. The revised answers could be: “Manufacturing, Wholesale Trade, Retail Trade, Agriculture, Construction, Service, Government, and Other.” The “other” category is too broad and the answer will not provide useful information.

Question #23

Workcred suggests that NCES revise question #23 to the following: “Do you have a CURRENTLY ACTIVE local, state, or federal license?” Most licenses are issued by local, state, and federal government entities. Industries do not issue licenses. NCES might also consider adding driver’s licenses for personal vehicles to the list of licenses that should not be included when answering this question.

Question #25

Workcred suggests that NCES consider eliminating this question. The reason that individuals obtain a license is because it is required to practice a specific occupation. There is a cost associated with obtaining and maintaining a license.

Question #29

Workcred suggests that NCES either eliminate this question or restructure it to focus on whether the individual is using their license for their primary job or another job. As stated above, occupations that have licenses mean that an individual cannot practice that occupation without obtaining the license. There is a legal ramification to this type of credential.

Question #30

Question #30 asks about the entity that issues the license. Workcred suggest eliminating “professional and trade organization” as one of the answers. Professional and trade organizations do not issue

licenses. The examples given, the American Culinary Federation and CompTIA issue certifications not licenses. In addition, Workcred suggests eliminating “business or company” as an answer choice. Businesses and companies do not issue licenses for people. Instead, they may issue licensing agreements for products and services.

Question #34

This question is similar to question #29. NCES should consider using either question #29 or #34 to ask whether a license is used for the respondent’s main job.

Question #43

For answer #2 “business or company,” Workcred suggests adding examples of companies that issue personnel certifications such as Microsoft, Cisco, or CrossFit)

Question #48

Is the purpose of this question to only address learning that occurred in schools? If not, there are other ways for individuals to obtain the skills and knowledge that prepare an individual to sit for a certification. These include apprenticeships, boot camps, professional societies, trade associations, and study materials provided by certification bodies. NCES might consider broadening the opportunities where individuals can learn the knowledge and skills that prepare them to sit for a certification.

Question #57

Workcred suggests that NCES consider removing the word “formal” from the question. It is unclear what is meant by “formal training from a coworker or mentor.”

Question #63

Vocational certificates are offered by a variety of entities outside of the formal education system. For example, vocational certificates may be offered by professional or industry associations. Workcred suggests that the options outlined in the question be expanded to include professional and industry associations.

Question #87

There are several other answer options that may be added to better understand the career paths of individuals with different types of limitations. Workcred suggests adding depth perception, sensory deficits, and dexterity, since these capabilities are considerations in occupational choice. Suggested language includes:

- FINE DEXTERITY to perform tasks that require coordination of small muscle movements to accomplish detailed tasks
- DEPTH PERCEPTION to be able to judge spatial relations of objects and move one’s body in the work environment
- SENSORY DEFICITS to feel or touch objects and manipulate them without the use of vision and to prevent bodily injury

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

Best regards,

A handwritten signature in black ink that reads "Roy A. Swift". The signature is written in a cursive style with a large, prominent "R" and "S".

Roy Swift, Executive Director
Workcred