



Non-degree Credentials Research Network

Desk officer for the National Science Foundation (NSF)
Office of Management and Budget
725 17th St. NW
Washington, DC 20503

October 29, 2021

Dear Officer,

We are pleased to write in support of approving the information collection request (ICR) for the National Training, Education, and Workforce Survey (NTEWS), as requested in Federal Register notice 86 FR 54250 dated 9/30/21 (ICR reference number 202109-3145-001).

We appreciate the care with which the National Center for Science and Engineering Statistics (NCSES) responded to our comments in response to the 60-day Federal Register notice. In general, we understand the constraints that NCSES faces and the need to avoid excessively burdening respondents. While we would still encourage NCSES to consider the comments made in response to the 60-day notice as the agency contemplates additions to the survey for 2024 and beyond, we will focus in this letter on how NCSES can maximize the utility and value of the NTEWS data product for researchers once data collection is complete. To this end, we would propose the following as terms of clearance:

OMB approves consistent with NCSES's commitment to ensure that public use files are designed appropriately to ensure that researchers can link individual respondents' responses across survey waves and detailed occupation and industry codes. NCSES is also requested to prepare high-quality training materials that help the research community use the NTEWS public use files, and consult with the research community (including the Non-degree Credentials Research Network based at George Washington University) on the design of bridge panels. NCSES should update the Non-degree Credentials Research Network on its progress in administering the NTEWS and preparing the dataset for researcher use every six months.

Below we describe our rationale and provide details on each of our requests.

- **Ensure maximum accessibility of longitudinal data to researchers.** One of the unique qualities of the other large-scale NCSES workforce survey, the National Survey of College Graduates, is the ability to link individual responses across the 2010, 2013, and 2015 waves of the survey. In 2017, NCSES removed the unique identifier that made such linkages possible from the public use files, requiring researchers to complete an application process to license restricted use files in order to link individuals' responses from the 2017 (and 2019) files to previous data waves on account of privacy concerns. We believe that the NTEWS will be most useful for the research community if NCSES takes appropriate precautions early in the planned sequence of NTEWS surveys to ensure that the public use files can be released with an identifier that allows researchers to link multiple waves of data while protecting respondent privacy. The recent addition of random "noise" to the salary data in the Department of Labor's Participant Individual Record Layout (PIRL) dataset may be one strategy for protecting respondent privacy that NCSES could consider between now and

the eventual release of a NTEWS public use file. In addition to maximizing the appeal of the NTEWS public use files to researchers, such precautions may reduce future expenses to taxpayers associated with evaluating researcher applications to access restricted use files and maintaining the NCSES Data Enclave and/or Federal Statistical Research Data Center (RDC) network.

- **Ensure that the public use files provide rich occupation and industry codes.** One of the strengths of the Department of Education’s Adult Training and Education Survey (ATES) was the inclusion of detailed SOC codes for occupation in the public use microdata files. We would like to see the NTEWS provide as much detail as possible on the occupations of respondents while maintaining privacy – ideally with sufficient detail to allow the public use files to be effectively “crosswalked” to the Occupational Information Network (O*Net). Similarly, industry should be coded in such a way that industry-level economic data can be linked to the NTEWS microdata through the use of NAICS codes.
- **Consult with the research community on “bridge panels.”** One of the unique characteristics of the NTEWS is the establishment of bridge panels that allow NCSES to test new survey items on a smaller population than the main survey. We believe that such panels have potential to be extremely useful for the research community, particularly with respect to developing new indicators of non-degree attainment. For example, bridge panels are an ideal instrument through which NCSES could test the reliability and validity of field-generated survey items of the sort that were suggested in comments on the 60-day notice – items that might include whether a credential is for credit or noncredit, or whether a credential was attained through online instruction. We would like to see NCSES consult with the NCRN on a regular basis on potential topics for the bridge panels and commit to publishing results from the bridge panel surveys as appropriate, even if warnings must be disseminated to the public with respect to the representativeness of the bridge panel samples.
- **Prepare training resources for the research community.** Prior to microdata release, it would be extremely helpful if NCSES would produce a tutorial – perhaps a video – or make plans to hold workshops for researchers to become proficient users of the NTEWS microdata. Such resources would both raise the profile of the NTEWS in the research community and raise the quality of research being conducted by external researchers.
- **Update the NCRN regularly.** The NCRN would be willing to provide time up to twice per year for NCSES project staff to present updates on the NTEWS, especially with respect to the availability of data for researchers and the design of future survey questionnaires. We encourage NCSES to reach out to us whenever we can be of assistance.

Again, speaking on behalf of the NCRN project team and community of researchers, we believe that the NTEWS is a well-conceived survey that promises to be of tremendous value of researchers. We would like to see OMB approve the survey with the terms suggested above, which are intended to ensure that taxpayers’ investment in the NTEWS yields the greatest possible benefits for all stakeholders.

Regards,



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