
THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

November 17, 2021

Ms. Kerrie Leslie
Statistical and Science Policy Office
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC

Via: Kerrie.L.Leslie@omb.eop.gov and OIRA_submission@omb.eop.gov

Re: O*NET Data Collection Program (OMB Control No. 1205-0421)

Dear Ms. Leslie,

I am pleased to submit this response to the Employment and Training Administration's request for comments on its information collection request (ICR) regarding the O*NET Data Collection Program (OMB Control No. 1205-0421), as published in the *Federal Register* on October 18, 2021 (86 FR 57701).

As a research professor at the George Washington Institute of Public Policy, George Washington University, and as the representative of research organizations on Labor Secretary Walsh's Workforce Information Advisory Council, I am keenly interested in the role of federal workforce data collections in enabling well-operating labor markets. I share the widely-held view that the Occupational Information Network (O*NET) Data Collection Program is an enormously valuable information resource for participants in the nation's labor markets and education and training systems, with socioeconomic benefits many orders of magnitude greater than its \$7.6 million annual appropriation. Consequently, I strongly support OMB's approval of the ICR for the O*NET Data Collection Program.

At the same time, I request that OMB makes its approval with two terms of clearance aimed at addressing two issues and, in doing so, further enhance O*NET's return on taxpayer investment.

The first issue concerns the pace of updating occupational profiles. According to Exhibit A-5 of Supporting Statement Part A, the O*NET Program plans to update 80-100 occupations in the first year of clearance, 90-100 in the second year, and 100 in the third. This suggests that a full update of the complete set of 821 occupations would take over eight years.

To the extent that a large number of O*NET occupations are not up-to-date, the likelihood of students and educators making good decisions falls. This in turn hinders the nation's capacity for economic competitiveness, equity, and inclusion as sought by President Biden. Consequently, I request the OMB issue a term of clearance requesting that within six months ETA provide a memo to OMB that describes the steps that would be necessary in order to keep

O*NET consistently up-to-date, the benefits of doing so, and the nature and level of resources such efforts would require.

The second issue is the absence of discussion regarding the possible use of existing and prospective administrative data sources to supplement the two O*NET surveys to improve data quality and reduce respondent burden. Current and prospective data sources I am aware of include:

- National Labor Exchange (NLx) Research Hub
- BLS Occupational Requirements Survey (ORS)
- ETA's Certification Finder and License Finder
- Jobs and Employment Data Exchange (JEDx), organized by the U.S. Chamber of Commerce Foundation -- a standardized job schema and inclusion of occupation in the employee record

To address this issue, I recommend that OMB request ETA prepare a revised Supporting Statement for PRA review within one year that:

- adds a paragraph in Part A Section 3.4 describing the current extent and nature of revisions to occupational descriptions through the use of alternative data sources, e.g., number of occupations revised annually, frequently revised data elements;
- discusses plans for improving use of data from alternative sources, including the NLx, ORS, ETA's credential finders, and JEDx;
- identifies the reduction in respondent burden and/or greater return on taxpayer investment (increased pace and extent of occupational revisions) due to these data improvements.

I very much appreciate the opportunity to provide comments on the O*NET Data Collection Program. I hope you find them of value and wish you all the best in your important work.

Sincerely,



Andrew Reamer
Research Professor

