November 23, 2022

OIRA Desk Officer for ETA
Office of Information and Regulatory Affairs
Office of Management and Budget
Washington, DC

Via: OIRA_submission@omb.eop.gov

Re: State Training Provider Eligibility Collection (OMB Control No. 1205-0523)

Dear OIRA Desk Officer,

I am pleased to submit this response to the Employment and Training Administration's invitation for comments to OMB on its information collection request (ICR) regarding the State Training Provider Eligibility Collection (OMB Control No. 1205-0523), as published in the *Federal Register* on October 24, 2022 (87 FR 64252). My comments are informed by my current efforts as:

- Research Professor, George Washington Institute of Public Policy, George Washington University (GW)
- Representative of research organizations, Workforce Information Advisory Council (WIAC), U.S. Department of Labor
- Principal Investigator on behalf of GW under a two-year contract with the National Center for Science & Engineering Statistics, National Science Foundation, to create, as part of the NSF Skilled Technical Workforce Initiative, a metadata repository of administrative datasets on non-degree credential attainment by the skilled technical workforce (STW)
- Board Member, Industry Studies Association and chair of its Industrial Policy Committee.

I believe that the State Training Provider Eligibility Collection is essential to federal and state workforce development research, program evaluation, and policymaking, including useful WIOA performance measures and Labor Department evidence-building efforts. I believe that it also is essential to the successful development and implementation of:

- a "modern American industrial strategy," which, according to National Economic Council Director Brian Deese, includes "a targeted and sectoral-based approach to workforce development" to promote the competitiveness of U.S. businesses in global markets; and
- the White House Office of Science and Technology Policy's (OSTP's)

- o Quadrennial Science and Technology Review and National Science and Technology Strategy—required by the CHIPS and Science Act of 2022 to address "United States workforce development and skills gaps" (Section 10387) and
  - o National Career and Technical Education (CTE) and STEM Education and Workforce Pipeline Strategy—as called for by the FY2022 Consolidated Appropriations Act;
- the National Secure Data Service (NSDS) Education and Training Pilot as recently proposed by the Advisory Committee on Data for Evidence Building (ACDEB) (see attached) for NSF implementation and report to Congress in 2024 (per Section 10375 of the CHIPS and Science Act of 2022).

WIOA-funded training program data provided through the State Training Provider Eligibility Collection are valuable in the NSF's STW Initiative efforts to support the NEC and OSTP strategies as well as generate a regular Science and Engineering (S&E) Indicators Report on the STW component of the STEM workforce (The STEM Labor Force of Today: Scientists, Engineers, and Skilled Technical Workers, September 2021.)

However, in my experience and that of my NSF project colleagues, ETA's State Training Provider Eligibility Collection has a number of data completeness and quality issues that diminish its value for NSF, NEC, OSTP, DOL program evaluation, and research efforts. To address these issues, in my 60-day period comments I requested that ETA tell OMB that it will:

- post a graphical summary by state that describes how each state approaches construction of the ETPL;
- post an assessment of each state's progress in meeting ETA guidance regarding inclusion of outcomes information with each state's ETPL;
- explore asking states to provide more detailed information on the physical location of each training provider, whether there are multiple locations where one can study with the same provider for the same credential, and if the provider is offering instruction online;
- indicate that in 2023 it will add a user-friendly function on trainingproviderresults.gov that indicates service areas covered by each training provider under WIOA;
- explore providing states with a consistent naming convention or unique identifier for a standardized typology of credentials
- explore providing states with a system of common identifiers for education and training institutions in Labor and Education department data systems (i.e., ETPL and IPEDS);
- explore providing states with more detailed guidance on coding each eligible program by SOC code, particularly in instances in which a program does not easily fit into an established SOC code and in which programs prepare an individual for multiple occupation codes; and

- explore asking states to provide for each eligible program the amount of instructional time and the length of the program.

I appreciate that in Supporting Statement Part A, Section 8, ETA has indicated that it will take my requests under advisement. To strengthen its consideration, I ask OMB to approve ETA's ICR for State Training Provider Eligibility Collection with the term of clearance that ETA report to OMB in nine months regarding its findings about the desirability and feasibility of fulfilling my requests in light of NEC, OSTP, NSF, and DOL objectives and congressional mandates.

I appreciate the opportunity to provide comments on the State Training Provider Eligibility Collection, hope OMB finds them of value, and look forward to OMB's decision.

Sincerely,

Andrew Reamer
Research Professor