

Carol Rowan, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue NE
Washington, D.C. 20212

Dear Ms. Rowan,

I am commenting on the proposal to add questions on occupational licensure and certification to the Current Population Survey, as outlined in the Federal Register, Volume 79, Number 137, July 17, 2014, pp. 41706-41707. Given the significant increase in occupational licensing and certification in recent decades, I think the proposed three new questions will have practical utility for policymakers, researchers, and workers, and I support adding questions on this topic.

You have shared information with me demonstrating that the proposed questions are based on extensive study and testing, including focus groups of individuals with occupational licenses and certificates. Although I found this information reassuring regarding the quality and clarity of the information to be gathered, I would like to make some comments about the wording of the questions that might further contribute to the utility and clarity of the information.

1. Regarding proposed question A.1., would it be helpful to explicitly explain that a standard high school or college diploma is not included in the intended meaning of "professional certificate"? Without an explicit clarification of this nature, will a nontrivial proportion of respondents say "yes" because they view their high school or college degree as a "professional certification"?
2. Proposed question A.3 asks "Is your certification or license required for your current job?" I am concerned that it may be unclear whether this is a fact question (about the legal or regulatory requirements for employment) or an opinion question (about whether or not someone

really needs formal certification or licensure in order to have the skills to do the job well). My sense is that the intent here is to focus on the fact question, about the formal requirements for holding the job. I am concerned that many respondents will not hear it that way and will instead say "yes" or "no" based on their opinion about whether what they learned in obtaining their certificate or license is essential for doing the job well. Many could say "no" because they have negative views about the training they received or resent having had to obtain a certificate or license.

I have not tried to propose alternative wording to address either of my concerns, out of deference to the Bureau's expertise in this area and the extensive research (including focus groups) underlying the proposal. I also stress that I support the thrust of the proposal — including new questions on certification and licensing. I hope my comments may contribute to the quality and clarity of the proposed new information, which will be of practical utility and support the proper performance of the functions of the Bureau of Labor Statistics.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard M. Todd". The signature is fluid and cursive, with the first name "Richard" being more legible than the last name "Todd".

Richard M. Todd
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