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# THE GEORGE WASHINGTON UNIVERSITY

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WASHINGTON, DC

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Office of Information and Regulatory Affairs  
Attn: OMB Desk Office for DOL-BLS  
Office of Management and Budget, Room 10235  
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Washington, DC 20503

Submitted via email: [OIRA\\_submission@omb.eop.gov](mailto:OIRA_submission@omb.eop.gov)

To whom it may concern,

I am pleased to provide comments on the revisions to the Current Population Survey (CPS) proposed by the Bureau of Labor Statistics (BLS), as described in the *Federal Register* on November 3, 2014. As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that promote competitiveness and innovation. I also serve on expert advisory panel of the National Center for Education Statistics' Interagency Working Group on Expanded Measures of Enrollment and Attainment, which provided advice on the CPS revisions currently proposed by BLS. From these perspectives, I support the agency's request to add three questions on certification and licensure and the remove three questions on educational attainment.

U.S. economic competitiveness depends on the nation's capacity to provide the skilled labor that businesses require to be successful. For this reason, the Lumina Foundation, the nation's largest philanthropic foundation with a sole focus on increasing higher education attainment, has set a goal of increasing the proportion of Americans with a postsecondary credential valued by the market—including degrees, industry-recognized certifications, and licenses—to 60 percent by 2025.<sup>1</sup> Educators, policy analysts, business leaders, and elected officials are placing increasing emphasis on the importance of teaching workers the particular competencies sought by businesses and verifying through industry-recognized certifications and government licenses that workers indeed have the competencies for which they were trained.<sup>2</sup> Recent research indicates that occupations with industry-recognized certifications are less likely to experience “credential inflation” than occupations without such certifications.<sup>3</sup>

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<sup>1</sup> Lumina Foundation, [“Lumina Foundation Strategic Plan 2013-2016.”](#)

<sup>2</sup> See for instance, Robert Mendenhall, [“What is Competency-Based Education,”](#) Huffington Post, September 5, 2012; the [Competency Model Clearinghouse](#) hosted by the U.S. Employment and Training Administration; the efforts of the [National Network of Business and Industry Associations](#), working through the ACT Foundation; and The White House, [“Ready to Work: Job-Driven Training and American Opportunity,”](#) July 2014.

<sup>3</sup> “Jobs resist credential inflation when there are good alternatives for identifying skill proficiency. Many health care and engineering technician jobs, such as Respiratory Therapists, show little sign of upcredentialing. That is likely because those positions are governed by strict licensing or certification standards, well-developed training

However, at present, data sources do not exist that allow:

- the Department of Labor, the Department of Education, philanthropic foundations, and policy researchers to see the prevalence of non-degree credentials in the adult population and the economic value of those credentials;
- businesses to more clearly see the utility of competency-based training for competitiveness;
- educators and trainers to identify the workforce outcomes of graduates with competency-based credentials compared to graduates without such credentials;
- students and workers to make informed decisions about competency-based career paths and education and training programs; and
- federal, state, and local workforce and education agencies to make investments in competency-based education and training activities with a high likelihood of success.

The proposed addition of the three questions on certification and licensure to the CPS would make a substantial contribution to filling this data gap and enabling labor market participants to make more informed and effective decisions. The new questions also would provide a valuable baseline complement to the far more detailed household data on competency-based credentials and experience that the National Center for Education Statistics plans to collect in 2015.

I support creating room on the CPS instrument for the new questions by removing the three questions on graduate education, which I don't find useful for the purposes of competitiveness policy.

I appreciate the opportunity to comment on the proposed CPS revisions and hope you find these thoughts helpful.

Sincerely,



Andrew Reamer  
Research Professor

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programs, or by measurable skill standards such that employers do not need to look at a college degree as a proxy for capability." Burning Glass, ["Moving the Goalposts: How Demand for a Bachelor's Degree Is Reshaping the Workforce,"](#) September 2014.



