

Public Comment to the First Federal Register Announcement

THE GEORGE WASHINGTON INSTITUTE OF PUBLIC POLICY

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WASHINGTON, DC

September 26, 2016

Ms. Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
4201 Wilson Boulevard, Suite 1265
Arlington, VA 22230

Via: splimpto@nsf.gov

Re: 2017 National Survey of College Graduates (OMB Control Number 3145-0141)

Dear Ms. Plimpton,

I am pleased to provide comments on the National Science Foundation's plan to ask Office of Management and Budget for renewed authority to conduct the National Survey of College Graduates (NSCG). A call for comments on this plan was published in the *Federal Register* on July 28, 2016 (FR Doc. 2016-17874).

As a research professor, I focus on federal policies that promote U.S. economic competitiveness in global markets. Secretary of Labor Perez recently appointed me to represent the interests of research entities on his new [Workforce Information Advisory Council](#) (WIAC).

In the Workforce Innovation and Opportunity Act of 2014, Congress creates the WIAC to advise the Secretary on the development and maintenance of a nationwide workforce and labor market information (LMI) system ([29 USC 491-2](#)). This law:

- says that this system shall include statistics on the "industrial distribution of occupations, as well as current and projected employment opportunities, wages, benefits (where data is available), and skill trends by occupation and industry, with particular attention paid to State and local conditions"
- indicates that this system shall "meet the needs of secondary school and postsecondary school students who seek [workforce and labor market information]"
- asks the Secretary of Labor, when creating this system, to "actively seek the cooperation of heads of other Federal agencies to establish and maintain mechanisms for ensuring complementarity and nonduplication in the development and operation of statistical and administrative data collection activities"

Consistent with this latter point, I was pleased to see that staff from the NSF's National Center for Science and Engineering Statistics were invited and present at the WIAC's first meeting.

From the perspectives of a research professor and a WIAC member, I believe that the NSCG provides data essential to the development of the mandated workforce and LMI system and, more generally, a globally competitive American workforce. Consequently, I support the NSF's forthcoming request to carry out the 2017 NSCG. As the convener of the roundtables at the

Brookings Institution in 2009-10 that led to the creation of the Interagency Working Group on Expanded Measures of Enrollment and Attainment (GEMEnA), I am particularly pleased to see questions A39-A49 on certifications and licenses.

On reviewing the draft 2017 NSCG survey instrument, I make one request for NSF's consideration—that it explore the potential for using student administrative records in the [National Student Clearinghouse](#) to obtain information on educational background, in lieu of asking this information from respondents.

Part D of the draft 2017 NSCG asks the respondent 20 questions, several quite detailed, regarding educational background. As can be seen in the attachment to this letter, the student records provided by participating postsecondary educational institutions to the Clearinghouse appear to have a substantial number of the Part D data elements. Clearinghouse records cover 97 percent of all enrollment in Title IV degree-granting institutions. (For a full discussion of the sources, structure, and uses of Clearinghouse data, please see Afet Dunbar and Doug Shapiro, ["The National Student Clearinghouse as an Integral Part of the National Postsecondary Data Infrastructure,"](#) National Student Clearinghouse Research Center, May 2016.)

The supporting statement for the 2015 NSCG indicates that that survey's total cost was \$14.3 million and the total burden on 135,000 sample persons was estimated to be 51,900 hours. Consequently, it appears that to the extent that the NSF can expand its use of administrative records in conducting the NSCG, it could reduce respondent burden, and perhaps total costs.

While I expect that the substitution of administrative data for survey data is not feasible five months before the commencement of the 2017 NSCG, I ask that NSF contact the Clearinghouse in the next few months to initiate exploration of the potential for such substitution in future iterations of the NSCG. Suggested points of contact are:

- Roberta Hyland, Chief of Staff, National Student Clearinghouse (hyland@studentclearinghouse.org, 703.742.4203)
- Doug Shapiro, Director, [National Student Clearinghouse Research Center](#) (shapiro@studentclearinghouse.org, 703.742.4864)

The Clearinghouse currently is in conversation with the Census Bureau's [Center for Administrative Records Research and Application](#) regarding possible use of Clearinghouse student records to enhance Census data. Further, an NSF examination of opportunities to utilize Clearinghouse data would be consistent with the efforts of the 114th Congress to promote federal use of administrative data instead of and in combination with survey data, as expressed in its funding the Census Bureau to create a national federal data clearinghouse and in its establishment of the [Commission on Evidence-based Policymaking](#).

I appreciate the opportunity to comment on NSF's plans to conduct the 2017 NSCG and hope it finds my comments and request of value.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Reamer". The signature is fluid and cursive, with the first name "Andrew" and last name "Reamer" clearly distinguishable.

Andrew Reamer
Research Professor

APPENDIX A: NATIONAL STUDENT CLEARINGHOUSE (NSC) DATA ELEMENTS

NATIONAL POSTSECONDARY DATA INFRASTRUCTURE 14 NATIONAL STUDENT CLEARINGHOUSE