

**Supporting Statement
for OMB Clearance
Request**

**Appendix O:
Comments from
Federal Register
Notice (Appendix O1)
and ACF Reponse to
Comments (Appendix
O2)**

**Pathways for Advancing
Careers and Education
(PACE) – Follow-up Data
Collection**

OMB No. 0970-0397

May 2017

Submitted by:
Nicole Constance
Office of Planning, Research
and Evaluation
Administration for Children
and Families
**U.S. Department of Health and
Human Services**

Appendix O1: Comments from Federal Register Notice

THE GEORGE WASHINGTON INSTITUTE OF PUBLIC POLICY

THE GEORGE WASHINGTON UNIVERSITY

WASHINGTON, DC

January 30, 2017

Administration for Children and Families
Office of Planning, Research, and Evaluation
330 C Street SW

Washington, DC 20201

Attn: OPRE Reports Clearance Officer

Re: PACE Third Follow-Up Data Collection (OMB No.: 0970-0397)

[Via: OPREinfocollection@acf.hhs.gov](mailto:OPREinfocollection@acf.hhs.gov)

Dear OPRE Reports Clearance Officer,

I am pleased to provide comments on the planned Pathways for Advancing Careers and Education (PACE) Third Follow-Up Data Collection announced by the Administration for Families and Children (ACF) in the *Federal Register* on January 13, 2017 [FR Doc. 2017-00583].

As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies that promote efficient labor markets. In this role, I serve on the Labor Secretary's [Workforce Information Advisory Council](#) (WIAC) as the representative of research organizations.

From these perspectives, I am impressed with the sophisticated design of the proposed PACE Third Follow-up Data Collection and support its submission to and approval by OMB. I am particularly pleased to see the integrated use of a household survey and administrative records from the National Directory of New Hires (NDNH) and the National Student Clearinghouse.

I offer several comments. First, I suggest ACF look into the potential value of the Census Bureau's [Longitudinal Employer-Household Dynamics \(LEHD\) database](#) as a supplement to or replacement for NDNH. LEHD is also drawn from state unemployment insurance wage records; at the same time, I believe, it covers a longer period of time and provides a larger amount of socio-economic information than NDNH. Consequently, it may have the potential to enhance the PACE data collection and reduce respondent burden.

Second, I suggest that ACF look at the survey instrument design for the National Center for Education Statistics' new 2016 [Adult Training and Education Survey \(ATES\)](#) to see if it might inform the design of the PACE Section D on education and credentials. NCES and partner statistical agencies put several years of research into determining productive ways to gather non-degree attainment data and PACE data collection might benefit from that.

Third, I ask that ACF provide the WIAC with information regarding its assessment of PACE, in terms of both methods and findings. In the Workforce Innovation and Opportunity Act of 2014, Congress created the WIAC to advise the Labor Secretary in “the development, maintenance, and continuous improvement of a nationwide workforce and labor market information system . . . that . . . enumerate, estimate, and project employment opportunities and conditions at national, State, and local levels in a timely manner.” (29 USC 491-2) As ACF is doing an excellent job in marrying survey and administrative data, I believe the several federal statistical and program agencies involved in the nationwide workforce and labor market information system (WLMIS) could learn from the ACF experience. At the same time, these agencies and the WIAC are engaged in the creation of a two-year plan for the WLMIS and would like to learn about ACF needs for externally-provided survey and administrative data. Points of contact for the WLMIS and the WIAC are:

- Steven Rietzke, Division Chief, National Programs, Tools, and Technical Assistance, Office of Workforce Investment, Employment & Training Administration, U.S. Department of Labor – (202) 693-3912 and rietzke.steven@dol.gov
- Rebecca Rust, Assistant Commissioner, Office of Occupational Statistics and Employment Projections, Bureau of Labor Statistics, U.S. Department of Labor – (202) 691-5701 and rust.rebecca@bls.gov

I appreciate the opportunity to comment on the PACE Third Follow-up, hope you find my suggestions useful, and look forward to your response.

Sincerely,



Andrew Reamer
Research Professor

Appendix O2: Response to Comments



ADMINISTRATION FOR
CHILDREN & FAMILIES

330 C Street, S.W., Washington, DC 20201 | www.acf.hhs.gov

DATE: May 12, 2017

TO: Andrew Reamer, George Washington University, George Washington
Institute of Public Policy

FROM: Nicole Constance, Administration for Children and Families, Office of
Planning, Research and Evaluation

SUBJECT: Responses to Federal Register Notice Comments on the Pathways for
Advancing Careers and Education (PACE) Third Follow-Up Data Collection

Thank you for your thoughtful comments on the Administration for Children and Families (ACF) Federal Register Notice dated January 13, 2017 [FR Doc. 2017-00583]. Your comments were helpful in refining the survey for the Pathways for Advancing Careers and Education (PACE) Third Follow-Up. Our responses to your comments are below.

Question 1: I suggest ACF look into the potential value of the Census Bureau's Longitudinal Employer-Household Dynamics (LEHD) database as a supplement to or replacement for NDNH. LEHD is also drawn from state unemployment insurance wage records; at the same time, I believe, it covers a longer period of time and provides a larger amount of socio-economic information than NDNH. Consequently, it may have the potential to enhance the PACE data collection and reduce respondent burden.

We considered trying to obtain access to unemployment insurance (UI) wage data and other data from the LEHD program at the Census Bureau, but determined that the Office of Child Support Enforcement's (OCSE's) UI data better met our study needs. Accessing LEHD data has several limitations. Census staff are not permitted to use LEHD data for program evaluation, so we could not partner with Census researchers directly to carry out analysis within their secure environment. The alternative would be to submit an application for access to LEHD data through the Research Data Center (RDC) network, which provides access to confidential data to security-cleared

researchers at RDC sites throughout the country. However, LEHD data in the RDCs is quite limited. Only a subset of states (currently about 20) permits their LEHD data to be made available to researchers via the RDC, so the data would not cover the full set of participants. Further, LEHD data in the RDCs is currently only available through 2011, so it would not cover the post-enrollment evaluation period for our study sample. Due to these limitations, we decided to use OCSE data.

Question 2: I suggest that ACF look at the survey instrument design for the National Center for Education Statistics' new 2016 Adult Training and Education Survey (ATES) to see if it might inform the design of the PACE Section D on education and credentials. NCES and partner statistical agencies put several years of research into determining productive ways to gather non-degree attainment data and PACE data collection might benefit from that.

The Abt study team reviewed the National Center for Education Statistics' (NCES) 2016 Adult Training and Education Survey (ATES). Although the ATES was developed for a different purpose and the survey format differs from what is planned for the PACE data collection (paper vs. computer-assisted personal interviewing), we were able to incorporate some questions/wording to improve Section D. A list of questions adopted from ATES (in part or in full) is below:

- *Question 6: certifications and licenses*
- *Questions 15a and b: was each credential useful to participants in getting or keeping a job*
- *Questions 30a, b, and d: certificates*
- *Question 39: work related training*

Question 3: I ask that ACF provide the WIAC with information regarding its assessment of PACE, in terms of both methods and findings. In the Workforce Innovation and Opportunity Act of 2014, Congress created the WIAC to advise the Labor Secretary in “the development, maintenance, and continuous improvement of a nationwide workforce and labor market information system . . . that . . . enumerate, estimate, and project employment opportunities and conditions at national, State, and local levels in a timely manner.” (29 USC 491-2) As ACF is doing an excellent job in marrying survey and administrative data, I believe the several federal statistical and program agencies involved in the nationwide workforce and labor market information system (WLMIS) could learn from the ACF experience. At the same time, these agencies and the WIAC are engaged in the creation of a two-year plan for the WLMIS and would like to learn about ACF needs for externally-provided survey and administrative data.

ACF is committed to ensuring that findings from our research studies are disseminated widely to various audiences, and that research methods and findings are described in a way that is clear and understandable to a variety of stakeholders. To that end, OPRE uses several means of disseminating research findings, all of which are available to the WIAC. All publications related to PACE will be posted on

the PACE project webpage of the OPRE website:

<https://www.acf.hhs.gov/opre/research/project/pathways-for-advancing-careers-and-education>. OPRE released an Evaluation Design Report for PACE in June 2015 and an Impact Analysis Plan in November 2015, both of which describe the research design and methods for analyzing findings from PACE. Additionally, the methods, analysis plans, and confirmatory and secondary outcomes for each site in PACE are pre-registered online through the What Works Clearinghouse's Registry of Randomized Controlled Trials in Education and the Center for Open Science's Open Science Framework.¹ Reports on implementation and impact findings from 15-months after random assignment are in preparation and will be posted to the PACE project page throughout 2017. Later reports on methods and findings from 36- and 72-months after random assignment will be released under the Career Pathways Intermediate Outcomes and Career Pathways Long-term Outcomes studies, respectively. Additional information about OPRE's broader career pathways research portfolio is available at <https://www.acf.hhs.gov/opre/research/project/opre-career-pathways-research-portfolio>.

In addition to our website, OPRE maintains a social media presence to promote research findings and publishes a biweekly newsletter for subscribed readers. Research findings from PACE and our broader career pathways portfolio will be presented at various research and professional conferences, such as the National Association for Welfare Research and Statistics (NAWRS), the Association for Public Policy and Management (APPAM), the American Evaluation Association (AEA), the Research and Evaluation Conference on Self-Sufficiency (RECS), and others. In addition to these broad dissemination efforts, the PACE team at OPRE will share research findings with staff at other government agencies, including the Department of Labor (DOL) and the Department of Education (ED) through intergovernmental working groups and informal communication. OPRE organizes the Federal Employment, Training, and Education (FETE) Working Group, of which staff from DOL regularly and actively participate to share knowledge and findings on employment and training research. OPRE staff are involved in several other interagency working groups and maintain informal communication with staff in other agencies through our collaborative work across agencies.

Finally, OPRE staff are available to provide additional and more specific information on PACE methods and findings and to discuss interest in externally-provided survey and administrative data with members of the WIAC upon request. Please feel free to reach out to me directly if you would like more information about the PACE study.

¹ The What Works Clearinghouse's registry is being transferred to the Society for Research on Educational Effectiveness (SREE) and will be available later in 2017. Please visit <https://www.sree.org/pages/registry.php> for more information.