

APPENDIX H

60-day Federal Register Notification, Comments, and Responses

<https://www.federalregister.gov/documents/2020/04/16/2020-08067/agency-information-collection-activities-comment-request>



automated collection techniques or other forms of information technology.

FOR FURTHER INFORMATION CONTACT: Frederick Licari by telephone at 202-693-8073, TTY 202-693-8064, (these are not toll-free numbers) or by email at DOL_PRA_PUBLIC@dol.gov.

SUPPLEMENTARY INFORMATION: The Standard requires employers to train workers about the hazards of asbestos, to monitor worker exposure, to provide medical surveillance, and maintain accurate records of worker exposure to asbestos. These records will be used by employers, workers, and the Government to ensure that workers are not harmed by exposure to asbestos in the workplace. For additional substantive information about this ICR, see the related notice published in the *Federal Register* on November 29, 2019 (84 FR 65849).

This information collection is subject to the PRA. A Federal agency generally cannot conduct or sponsor a collection of information, and the public is generally not required to respond to an information collection, unless the OMB approves it and displays a currently valid OMB Control Number. In addition, notwithstanding any other provisions of law, no person shall generally be subject to penalty for failing to comply with a collection of information that does not display a valid OMB Control Number. See 5 CFR 1320.5(a) and 1320.6.

DOL seeks PRA authorization for this information collection for three (3) years. OMB authorization for an ICR cannot be for more than three (3) years without renewal. The DOL notes that information collection requirements submitted to the OMB for existing ICRs receive a month-to-month extension while they undergo review.

Agency: DOL-OSHA.

Title of Collection: Asbestos in Shipyards Standard.

OMB Control Number: 1218-0195.

Affected Public: Private Sector; Business or other for-profits.

Total Estimated Number of Respondents: 585.

Total Estimated Number of Responses: 3,583.

Total Estimated Annual Time Burden: 1,237 hours.

Total Estimated Annual Other Costs Burden: \$ 44,578.

Authority: 44 U.S.C. 3507(a)(1)(D).

Dated: April 12, 2020.

Frederick Licari,

Departmental Clearance Officer.

[FR Doc. 2020-08039 Filed 4-15-20; 8:45 am]

BILLING CODE 4510-26-P

DEPARTMENT OF LABOR

Office of the Secretary

Agency Information Collection Activities; Submission for OMB Review; Comment Request; Beryllium Standard for General Industry, Construction and Maritime

ACTION: Notice of availability; request for comments.

SUMMARY: The Department of Labor (DOL) is submitting this Occupational Safety and Health Administration (OSHA)-sponsored information collection request (ICR) to the Office of Management and Budget (OMB) for review and approval in accordance with the Paperwork Reduction Act of 1995 (PRA). Public comments on the ICR are invited.

DATES: The OMB will consider all written comments that agency receives on or before May 18, 2020.

ADDRESSES: Written comments and recommendations for the proposed information collection should be sent within 30 days of publication of this notice to www.reginfo.gov/public/do/PRAMain. Find this particular information collection by selecting "Currently under 30-day Review—Open for Public Comments" or by using the search function.

Comments are invited on: (1) Whether the collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility; (2) if the information will be processed and used in a timely manner; (3) the accuracy of the agency's estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used; (4) ways to enhance the quality, utility and clarity of the information collection; and (5) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

FOR FURTHER INFORMATION CONTACT: Frederick Licari by telephone at 202-693-8073, TTY 202-693-8064, (these are not toll-free numbers) or by email at DOL_PRA_PUBLIC@dol.gov.

SUPPLEMENTARY INFORMATION: The standard requires employers to monitor employee exposure to beryllium and beryllium compounds, to establish and implement a written control plan, to conduct medical surveillance, to provide personal protective equipment, to train workers about the hazards faced working in and around beryllium, and

to establish and maintain accurate records of worker exposure to beryllium and beryllium compounds. These records are used by employers, workers, physicians, and the Government to ensure that workers are not harmed by exposure to beryllium. For additional substantive information about this ICR, see the related notice published in the *Federal Register* on February 3, 2020 (85 FR 5996).

This information collection is subject to the PRA. A Federal agency generally cannot conduct or sponsor a collection of information, and the public is generally not required to respond to an information collection, unless the OMB approves it and displays a currently valid OMB Control Number. In addition, notwithstanding any other provisions of law, no person shall generally be subject to penalty for failing to comply with a collection of information that does not display a valid OMB Control Number. See 5 CFR 1320.5(a) and 1320.6.

DOL seeks PRA authorization for this information collection for three (3) years. OMB authorization for an ICR cannot be for more than three (3) years without renewal. The DOL notes that information collection requirements submitted to the OMB for existing ICRs receive a month-to-month extension while they undergo review.

Agency: DOL-OSHA.

Title of Collection: Beryllium Standard for General Industry, Construction and Maritime.

OMB Control Number: 1218-0267.

Affected Public: Private Sector; Business or other for-profits.

Total Estimated Number of Respondents: 5,872.

Total Estimated Number of Responses: 246,656.

Total Estimated Annual Time Burden: 194,261 hours.

Total Estimated Annual Other Costs Burden: \$46,158,266.

Authority: 44 U.S.C. 3507(a)(1)(D).

Dated: April 12, 2020.

Frederick Licari,

Departmental Clearance Officer.

[FR Doc. 2020-08038 Filed 4-15-20; 8:45 am]

BILLING CODE 4510-26-P

NATIONAL SCIENCE FOUNDATION

Agency Information Collection Activities; Comment Request;

AGENCY: National Science Foundation.

ACTION: Notice.

SUMMARY: The National Center for Science and Engineering Statistics (NCSES) within the National Science

Foundation (NSF) is announcing plans to request approval for a new collection referred to as the National Training, Education, and Workforce Survey (NTEWS). The NTEWS will be a new, voluntary data collection sponsored by NCSES and cosponsored by the National Center for Education Statistics (NCES) within the U.S. Department of Education. The NTEWS serves to measure and understand two research concepts that are of national interest: (1) The education, training, and career pathways of skilled technical workers, and (2) the prevalence and interplay of education (postsecondary degrees and certificates), work credentials (certifications and licenses), and work experience programs among American workers. NCSES intends to release national estimates from the NTEWS collection. Under the requirements of the Paperwork Reduction Act of 1995, NCSES is providing an opportunity for public comment on this action. After obtaining and considering public comment, NCSES will prepare the submission requesting that OMB approve clearance of this collection for three years.

DATES: Written comments on this notice must be received by June 15, 2020 to be assured consideration. Comments received after that date will be considered to the extent practicable. Send comments to the address below.

FOR FURTHER INFORMATION CONTACT: Suzanne H. Plimpton, Reports Clearance Officer, National Science Foundation, 2415 Eisenhower Avenue, Suite W18200, Alexandria, Virginia 22314; telephone (703) 292-7556; or send email to splimpto@nsf.gov. Individuals who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339, which is accessible 24 hours a day, 7 days a week, 365 days a year (including Federal holidays).

SUPPLEMENTARY INFORMATION:

Title of Collection: The National Training, Education, and Workforce Survey.

OMB Control Number: 3145-NEW.

Expiration Date: Not Applicable.

Type of Request: Intent to seek approval for a new information collection.

Abstract: The pervasiveness of science and technology in society, including its central role in the economy, has changed the nature of work for individuals at all education levels, making skilled technical workers increasingly important to U.S. economic competitiveness, national security, and scientific progress. American workers who use science, technology,

engineering, and mathematics (STEM) knowledge and skills in their jobs, but who do not have a bachelor's degree comprise the skilled technical workforce (STW). While data exists to quantify the number of skilled technical workers, limited information exists to examine how individuals enter, maintain relevance, or seek advancement in STW occupations. As a result, the currently available survey data are of limited utility for policymakers and STW stakeholders (employers, workforce advocates, and educational trainers) who are seeking more detailed information to inform discussions about STW policies, processes, and education and training programs. In response, NCSES has begun a multidimensional initiative to measure and understand the skilled technical workforce. This effort includes outreach with STW stakeholders to determine information needs and current data gaps, the identification and assessment of viable administrative data sources to inform STW-related research and policy discussions, and the plans for a new federal survey targeting the STW—the National Training, Education, and Workforce Survey (NTEWS).

The NTEWS will be a new, voluntary data collection sponsored by the National Center for Science and Engineering Statistics (NCSES) within the National Science Foundation and cosponsored by the National Center for Education Statistics (NCES) within the U.S. Department of Education. The NTEWS serves to measure and understand two research concepts that are of national interest: (1) The education, training, and career pathways of skilled technical workers, and (2) the prevalence and interplay of education (postsecondary degrees and certificates), work credentials (certifications and licenses), and work experience programs among American workers.

The content of the initial NTEWS expands on a former federal survey, the 2016 Adult Training and Education Survey (ATES), which was sponsored by NCES. The initial NTEWS will collect information on the following topics to examine the relationship between credentials and employment outcomes:

- Credential types
- Education characteristics
- Initial work training
- Employment characteristics
- Demographic characteristics

Given these areas of mutual interest for NCSES and NCES, the NTEWS will reduce public burden by fielding one cosponsored survey that meets the

information needs for both federal agencies.

The initial NTEWS data collection effort will serve as the first cycle for a planned biennial, rotating panel design. Respondents will have the option to complete the survey by web, paper, or computer-assisted telephone interviewing (CATI). NCSES plans to incorporate methodological experiments in the initial administration to examine response mode and incentive options. Results from those experiments will be used to determine a data collection methodology that maximizes data quality, minimizes respondent burden, and reduces data collection cost in future cycles.

NCSES will analyze the initial NTEWS data to inform and resolve any statistical, methodological, operational, and content issues before the subsequent NTEWS collection cycle in the planned biennial survey cycle design.

The U.S. Census Bureau will serve as the Federal data collection contractor on behalf of NCSES and NCES. The NTEWS data will be protected under the applicable Census Bureau confidentiality statutes.

Use of the information: NCSES and NCES intend to publish national estimates from the initial NTEWS, as well as use the results to inform the next survey cycle. It is anticipated that the NTEWS data will be used for the two congressionally mandated biennial reports authored by NCSES: *Women, Minorities, and Persons with Disabilities in Science and Engineering* and *Science and Engineering Indicators*. NCES plans to release a special-topic statistical report on the status of educational and professional credentials in the United States. In addition, a public release file of collected data, designed to protect respondent confidentiality, will be made available to policymakers, researchers, and the public on the internet.

Established within NSF by the America COMPETES Reauthorization Act of 2010 § 505, codified in the NSF Act of 1950, as amended, NCSES serves as a central Federal clearinghouse for the collection, interpretation, analysis, and dissemination of objective data on science, engineering, technology, and research and development for use by practitioners, researchers, policymakers, and the public. NCSES also provides data to support the Science and Engineering Equal Opportunities Act of 1980, which directs NSF to provide to Congress and the Executive Branch an "accounting and comparison, by sex, race, and ethnic group and by discipline, of the participation of

women and men in scientific and engineering positions.”

NCSES has historically met these legislative mandates through its suite of surveys and biennial publications that measure the education, employment, and demographic characteristics of the nation's college-educated scientists and engineers. However, an emerging research and policy interest in the STW creates a need for new data to expand and supplement NCSES's efforts on the college-educated science and engineering workforce.

Expected Respondents: All previous respondents to the 2018 American Community Survey, collected by the U.S. Census Bureau, are eligible to be selected to participate in the initial NTEWS. Approximately 40,000 adults, ages 16–75 and not enrolled in high school, will be selected for the NTEWS sample. The NTEWS sample design will meet the needs of both NCSES and NCES by providing coverage of the workforce-eligible adult population and including an oversample of adults who are in skilled technical occupations.

Estimate of Burden: The expected response rate is 62.5 percent, or 25,000 completed cases. The amount of time to complete the survey may vary depending on an individual's circumstances and the mode of the collection (web, paper, or telephone). NCSES estimates an average completion time of 15 minutes. NCSES estimates that the average annual burden for the initial NTEWS over the course of the three-year OMB clearance period will be no more than 2,084 hours ((25,000 completed cases × 15 minutes)/3 years).

Comments: Comments are invited on (a) aspects of the data collection effort (including, but not limited to, the following: The availability of administrative and supplemental sources of data on the skilled technical workforce, survey content, contact strategy, and statistical methods); (b) whether the proposed collection of information is necessary for the proper performance of the functions of NCSES, including whether the information shall have practical utility; (c) the accuracy of the NCSES's estimate of the burden of the proposed collection of information; (d) ways to enhance the quality, use, and clarity of the information on respondents, including through the use of automated collection techniques or other forms of information technology; and (e) ways to minimize the burden of the collection of information on those who are to respond, including through the use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Dated: April 13, 2020.

Suzanne H. Plimpton,

Reports Clearance Officer, National Science Foundation.

[FR Doc. 2020-08067 Filed 4-15-20; 8:45 am]

BILLING CODE 7555-01-P

NATIONAL SCIENCE FOUNDATION

Sunshine Act Meeting; National Science Board

The National Science Board's Committee on National Science and Engineering Policy (SEP), pursuant to NSF regulations (45 CFR part 614), the National Science Foundation Act, as amended (42 U.S.C. 1862n-5), and the Government in the Sunshine Act (5 U.S.C. 552b), hereby gives notice of the scheduling of a teleconference for the transaction of National Science Board business, as follows:

TIME AND DATE: Wednesday, April 22, 2020 at 4:00–5:00 p.m. EDT.

PLACE: This meeting will be held by teleconference at the National Science Foundation, 2415 Eisenhower Avenue, Alexandria, VA 22314. An audio link will be available for the public. Contact the Board Office 24 hours before the teleconference to request the public audio link at nationalsciencebrd@nsf.gov.

STATUS: Open.

MATTERS TO BE CONSIDERED: Chair's opening remarks; discussion of outcomes from the committee retreat and items to be brought forth for discussion at the May NSB meeting.

CONTACT PERSON FOR MORE INFORMATION: Point of contact for this meeting is: Reba Bandyopadhyay (rbandyop@nsf.gov), 703/292-7000. Members of the public must contact the Board Office to request the public audio link by sending an email to nationalsciencebrd@nsf.gov at least 24 hours prior to the teleconference.

Meeting information and updates (time, place, subject matter or status of meeting) may be found at <http://www.nsf.gov/nsb/meetings/notices.jsp#sunshine>. Please refer to the National Science Board website www.nsf.gov/nsb for additional information.

Chris Blair,

Executive Assistant to the National Science Board Office.

[FR Doc. 2020-08179 Filed 4-14-20; 4:15 pm]

BILLING CODE 7555-01-P

NUCLEAR REGULATORY COMMISSION

Advisory Committee on the Medical Uses of Isotopes: Meeting Notice

AGENCY: U.S. Nuclear Regulatory Commission.

ACTION: Notice of Meeting.

SUMMARY: The U.S. Nuclear Regulatory Commission (NRC) will convene a teleconference meeting of the Advisory Committee on the Medical Uses of Isotopes (ACMUI) on April 30, 2020, to discuss the draft recommendations of the ACMUI COVID-19 Subcommittee. The ACMUI subcommittee's recommendations will include its review of the impact of COVID-19 on the medical use community and potential regulatory relief measures as it relates to the medical uses of radioactive material. Meeting information, including a copy of the agenda and handouts, will be available at <https://www.nrc.gov/reading-rm/doc-collections/acmui/meetings/2020.html>. The agenda and handouts may also be obtained by contacting Ms. Kellee Jamerson using the information below. **DATES:** The teleconference meeting will be held on Thursday, April 30, 2020, 2:00 p.m. to 4:00 p.m. Eastern Time.

Public Participation: Any member of the public who wishes to participate in the teleconference should contact Ms. Jamerson using the contact information below.

FOR FURTHER INFORMATION CONTACT: Kellee Jamerson, (301) 415-7408; email: Kellee.Jamerson@nrc.gov.

SUPPLEMENTARY INFORMATION:

Conduct of the Meeting

Dr. Robert Schleipman, ACMUI Vice Chairman, will preside over the meeting. Dr. Schleipman will conduct the meeting in a manner that will facilitate the orderly conduct of business. The following procedures apply to public participation in the meeting:

1. Persons who wish to provide a written statement should submit an electronic copy to Ms. Jamerson at the contact information listed above. All written statements must be received by April 27, 2020, three business days prior to the meeting, and must pertain to the topic on the agenda for the meeting.

2. Questions and comments from members of the public will be permitted during the meeting at the discretion of the ACMUI Vice Chairman.

3. The draft transcript and meeting summary will be available on ACMUI's website <https://www.nrc.gov/reading->

PUBLIC SUBMISSION

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Docket: NSF_FRDOC_0001
Recently Posted NSF Rules and Notices.

Comment On: NSF_FRDOC_0001-2485
Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: NSF_FRDOC_0001-DRAFT-0425
Comment on FR Doc # 2020-08067

Submitter Information

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4163 COLUMBINE CT.
VADNAIS HEIGHTS, MN, 55127-6143
Email: jgrann@credentialengine.org
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Organization: Credential Engine

General Comment

Credential Engines comments regarding document number: 2020-08067, publication date: 4/16/2020

June 15, 2020

Credential Engine supports the proposed development of the National Training, Education, and Workforce Survey (NTEWS).

We offer a few comments here suggesting to expand the survey topics, to improve the interpretation of findings by coordinating credential references with the CTDL schema, and to build upon the supplemental sources of data provided via Credential Engines Registry.

Survey topics: Credential Engine has documented over 730,000 credentials being offered throughout America. The breadth of these offerings makes it challenging for the public to evaluate these options and make well informed enrollment decisions. As such, we recommend that NTEWS consider expanding its data collection topics to also include Americans credential information seeking behavior in order to help target career counseling and related outreach efforts. We believe this expansion is especially important in order to increase social mobility and promote more equitable outcomes. For example, Strada Education Networks Public Viewpoint: COVID-19 Work and Education Survey - Updated June 10, 2020 found that, compared to other racial and ethnic groups, black Americans rank advice about education and training from colleges and universities as less valuable than advice from

other sources. By including questions concerning this topic, NTEWS could provide consistent information about how the skilled technical workforce learns about credential offerings and how those offerings are evaluated relative to an enrollment decision. Credential Engine is particularly interested in using such data to ensure credential providers are providing the most helpful information about their offerings via the most effective channels.

Interpretation of findings: A founding purpose of Credential Engine has been to develop, maintain, and expand the openly-licensed Credential Transparency Description Language (CTDL) schema, which currently defines over 500 terms used to describe many aspects of credentials. Currently, CTDL is being used by government agencies across seventeen states to communicate credential offerings in their jurisdiction to the public. We recommend coordinating all credential terms used in the future NTEWS with the CTDL schema in order to help the research community better interpret survey findings and to facilitate analysis with the broad credential offering marketplace. For example, NTEWS respondents may fail to consistently interpret certifications and therefore over report instances of obtaining various training certificates used for compliance or regulatory purposes. We welcome additional discussion on how the CTDL schema could be used to improve the NTEWS design and also facilitate the interpretation of findings relative to the credential marketplace.

Supplemental sources of data: Credential Engine maintains a Registry of linked open data on all credential offerings, which could serve as a valuable supplemental source of data. Verified accounts can access data in the Registry via an API, an html widget, or via a bulk download. These data are also made available to the public via the demonstration website <https://credentialfinder.org/>. You can register via an account using the following linked quick start guide <https://credreg.net/quickstart/search>. We would welcome the opportunity to discuss how the hundreds of thousands of data points already available in the Registry concerning credentials of all types could supplement this research and potentially reduce respondents reporting burden.



(FRN COMMENT #1)

September 24, 2021

Jeff Grann
Credential Engine
4163 Columbine Court
Vadnais Heights, MN 55127-6143
jgrann@credentialengine.org
RE: NCSSES Responses to 60-day Public Comment Period

Dear Jeff,

Thank you for responding to the National Center for Science and Engineering Statistics (NCSSES) within the National Science Foundation call for comments published in the *Federal Register* on April 16, 2020 (FR Doc. 2020-08067), which announced our plan to ask the Office of Management and Budget for authority to conduct the National Training, Education, and Workforce Survey (NTEWS). The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment. Please see our responses to your comments:

We agree with you that gathering information on how individuals obtain and weigh information to make a decision on seeking a credential could be useful data for the federal government and its public users of the data. We will take into consideration your suggestion to expand the NTEWS to include information-seeking behavior for future cycles of NTEWS as long as such questions stay within the scope of NTEWS's goals and purpose. For the first cycle of NTEWS, we are primarily focused on obtaining a baseline of data on individuals that have a work-related credential and work in the skilled technical workforce. NCSSES will seek to coordinate with other federal statistical agencies, such as the National Center for Education Statistics (NCES) within the Department of Education or the Bureau of Labor Statistics (BLS) within the Department of Labor to see if such questions would be better suited in their longitudinal studies. We appreciate that you recommended that there be more coordination on the credential terms and their definitions.

As you know, the U.S. credentialing system is vast and complicated. We understand your concern that misreporting may occur due to misunderstanding or misinterpretation of credential terms. We will work within the federal government as well as stakeholders such as the Credential

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2415 Eisenhower Avenue
Alexandria, Virginia 22314

Engine to ensure that we aim for accurate reporting. We believe that this goal is a process and that it will take some time to calibrate our measurements. We welcome that Credential Engine is willing to share CTDL schema and discussions to improve the interpretation of findings.

Finally, as federal statistical agencies are looking for other data sources to supplement survey data, we appreciate you sharing Credential Engine's Registry of open data on all credential offerings. We will explore it as a resource and follow up on your offer to discuss any questions that will help the NCSES better measure and understand the skilled technical workforce.

Thank you again for your comments and support for the new NTEWS data collection. As a new survey, NCSES believes that NTEWS benefits from feedback from stakeholders, researchers, and policy makers. If you would like clarification on any of these responses or would like to ask additional questions about NTEWS, please do not hesitate to contact me at your convenience. I can be reached by email at jfinamor@nsf.gov or by phone at (703) 292-2258.

Sincerely,

John Finamore
Chief Statistician
National Center for Science and Engineering Statistics

PUBLIC SUBMISSION

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Comment On: NSF_FRDOC_0001-2485
Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: NSF_FRDOC_0001-DRAFT-0424
Comment on FR Doc # 2020-08067

Submitter Information

Name: Wendy Sedlak
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Organization: Lumina Foundation

General Comment

Would it be possible to add a question about industry-embedded certifications. These are programs that allow students to obtain marketable industry and educational credentials simultaneously. Such programs are often implemented in partnership with the relevant certification body, which may provide industry-validated skill standards and curricula that are aligned with the certification requirements. We would be interested in understating where these certifications are embedded (AD, for-credit certificate, BA, non-credit CTE, etc.) as well as who is responsible for covering the cost for the industry certification exam (employer, institution, student, etc.)



(FRN COMMENT #2)

September 24, 2021

Wendy Sedlak
Lumina Foundation
30 S. Meridian Street Suite 700
Indianapolis, IN 46204
wsedlak@luminafoundation.org
RE: NCSSES Responses to 60-day Public Comment Period

Dear Wendy,

Thank you for responding to the National Center for Science and Engineering Statistics (NCSSES) within the National Science Foundation call for comments published in the *Federal Register* on April 16, 2020 (FR Doc. 2020-08067), which announced our plan to ask the Office of Management and Budget for authority to conduct the National Training, Education, and Workforce Survey (NTEWS). The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment. Please see our response to your specific comment:

Adding questions that investigate the prevalence and financial support of industry-embedded credentials would be appropriate for the NTEWS. Any new survey content must be thoroughly researched to develop an adequate measure of the concept. Part of that research includes cognitively testing the new survey content with a sample before going out to the field. There has been extensive cognitive testing on the NTEWS survey content, and to date, there has been no participant that has mentioned the term “industry embedded certification.” NCSSES would be interested in knowing more on how it is defined and recognized by the industry, and how it is different from other certifications because it tends to focus on occupational skills. Would a respondent be able to make this distinction in a survey? As such, NCSSES needs time to test new items to measure concepts that can be operationalized in a study on adults. This process usually takes half a year or more before NCSSES has a survey question. As the initial NTEWS cycle is primarily concerned with obtaining baseline credential information and identifying those in the skilled technical workforce, this NTEWS cycle is unable to accommodate new survey topics. However, we will take into consideration your suggestion when we begin testing for the next NTEWS cycle.

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2415 Eisenhower Avenue
Alexandria, Virginia 22314

Thank you again for your comments. As a new survey, NCSES believes that NTEWS benefits from feedback from stakeholders, researchers, and policy makers. If you would like clarification on any of these responses or would like to ask additional questions about NTEWS, please do not hesitate to contact me at your convenience. I can be reached by email at jfinamor@nsf.gov or by phone at (703) 292-2258.

Sincerely,

John Finamore
Chief Statistician
National Center for Science and Engineering Statistics

Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue, Suite W18200
Alexandria, Virginia 22314

June 15, 2020

Dear Ms. Plimpton and Colleagues:

The undersigned members of the Non-Degree Credentials Research Network (NCRN), a project of the George Washington Institute of Public Policy (GWIPP) at George Washington University, wish to convey our **strong endorsement** of the planned information collection request (ICR) for the National Education, Training, and Workforce Survey (NTEWS), OMB control number 3145-NEW, proposed by the National Center for Science and Engineering Statistics (NCSES) of the National Science Foundation (per 85 FR 21271).

We believe that the NTEWS promises to be an essential source of data on phenomena of serious interest to our research community, including the prevalence of credentials not captured in federal data sources related to college degrees, inequality in who attains such credentials, and the relationship between credential attainment and labor market outcomes such as salary and job satisfaction. Its longitudinal nature will also permit us to track whether attainment is increasing or declining over time, which will help policymakers understand the changing value of non-degree credentials in the overall labor market.

In addition, we think that the NTEWS also represents a promising transition on the part of the National Science Foundation away from focusing on the population of individuals who hold a baccalaureate degree in favor of recognizing the contributions to the American scientific and engineering enterprise made by skilled workers without a bachelor's degree. By doing so, NCSES is collecting data that will be needed to plan and evaluate potential new public policies that promise to increase the attainment of sub-baccalaureate credentials, including the Department of Labor's efforts to introduce Industry-Recognized Apprenticeship Programs and the expansion of Pell grants for short-term training programs. With this in mind, we encourage NCSES to continue to explore opportunities to improve our understanding of who is earning non-degree credentials and characteristics of those credentials. In particular, we encourage NCSES to:

- consider ways to add further depth to items about the attainment of credentials and other forms of training, including the extent of costs associated with earning credentials (be they out-of-pocket or covered by employers);
- expand the survey as much as possible to include items from the Adult Training and Education Survey not reflected in the current draft ICR (which might include items that ask individuals to rate the perceived value of their credentials) and the National Survey of College Graduates (for example, about individuals' job responsibilities and dimensions of job satisfaction); and

- investigate the compatibility of language used in survey items, especially concerning the definitions of different types of credentials, with those used by its international counterparts such as Eurostat so that the NTEWS can facilitate cross-national comparative research.

We commend NCSES for efforts that it has made already to engage in outreach with our research community and encourage continued collaboration with the many scholars and researchers who hope to use NTEWS data. To that end, we encourage NCSES to consider how it may engage in targeted outreach and training in the use of NTEWS public-use datasets. We suggest that the online data user community, e-mail list, conferences, and series of in-person trainings funded by the US Department of Education for researchers interested in the International Program for the Assessment of Adult Competencies (PIAAC) may be a model for this sort of outreach. We would be pleased to consult with NCSES about how it could engage in such an outreach strategy.

Thank you for the opportunity to comment on the draft NTEWS ICR. Again, **we strongly support** NCSES' development of the NTEWS and hope that NCSES finds our suggestions to be of interest and value.

On behalf of the undersigned members of the Non-Degree Credentials Research Network,

Kyle Albert
GW Institute of Public Policy, George Washington University

Stephen Crawford
GW Institute of Public Policy, George Washington University

Andrew Reamer
GW Institute of Public Policy, George Washington University

Tingting Zhang
Merrimack College

Jeff Strohl
Georgetown University

David Bills
University of Iowa

Deborah M. Seymour
Higher Education Innovation Consulting, LLC

Also co-signed by the following NCRN organizational participants:

Credential Engine

New America Education Policy Program

Education and Employment Research Center, Rutgers University

Concentric Sky, Inc.

Center for the Future of Higher Education & Talent Strategy, Northeastern University

Association for Career and Technical Education

Workcred, an affiliate of the American National Standards Institute



(FRN COMMENT #3)

September 24, 2021

Non-Degree Credentials Research Network (NCRN)
A project of the George Washington Institute of Public Policy (GWIPP)
George Washington University

Dear NCRN,

Thank you for responding to the National Center for Science and Engineering Statistics (NCSSES) within the National Science Foundation call for comments published in the *Federal Register* on April 16, 2020 (FR Doc. 2020-08067), which announced our plan to ask the Office of Management and Budget for authority to conduct the National Training, Education, and Workforce Survey (NTEWS). The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment. Please see our responses to your comments:

We appreciate that the recommendations are from a membership that researches the prevalence and impact of U.S. non-degree credentials. As the first cycle of data collection, we have many goals for the NTEWS. The two most important is to understand and measure the prevalence of credentials and identify the skilled technical workforce – those working in occupations with scientific and technical skills but do not require a bachelor’s degree. As such, please consider the first cycle as a baseline of information. For NTEWS collections that follow, we will research and test additional items that should address your comment for in-depth information on the attainment of credentials and other ways of training. As NCSSES considers the addition of new items for future cycles, we also have to consider the optimal survey length that minimizes the survey burden on the respondent, resulting in a high response rate.

You noted that the draft of the NTEWS that you based your comments was on missing a cost question. We successfully tested a cost question during our cognitive research, and as a result of that research, we added the question to understand the costs associated with earning credentials.

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We will explore this topic more if information from studies of college costs (i.e., the National Postsecondary Study on Student Aid) or administrative data would be better data sources on understanding the costs of a credential. We believe that information on costs is an important but complicated topic that requires continual investigation.

For the first cycle of the NTEWS, which is a voluntary survey, we have included as much Adult Training and Education Survey (ATES) and National Survey on College Graduates (NSCG) items as possible. The ones that were in the draft you reviewed were deemed to be reliable measures and performed well within the additional cognitive testing we conducted. For those ATES and NSCG items that did not transfer over to the NTEWS, the primary reasons are either we needed to ensure that the survey instrument was not burdensome, resulting in non-response, or the item requires further testing. We have plans to continue to refine and testing omitted ATES and NSCG items, and these may appear in future NTEWS cycles.

We agree with NCRN's comment on establishing consistency of credential terminology used in the NTEWS. Upholding a level of consistency will serve the purpose of accurate reporting by respondents as well as improve data usability when compared with other data sources on credentials, such as Eurostat. We will investigate the Eurostat framework to ensure we are consistent wherever possible in future administrations; however, this goal will need to be weighed against the goals of interpretability for an U.S. population and continuity over time within NTEWS. NCSSES believes that the first cycle will allow us to gain baseline measurements on credentials and that future cycles will be refined through data users' and policy makers' feedback.

Finally, NCSSES will investigate various outreach and training deliveries to data users. NCRN's suggestion that NCSSES look at the Department of Education's PIAAC outreach and training as a program to model is a helpful start. NCSSES is always looking for areas to improve stakeholders' experience and understanding of NCSSES data.

Thank you again for your comments and a strong endorsement for the new NTEWS data collection. As a new survey, NCSSES believes that NTEWS benefits from feedback from stakeholders, researchers, and policy makers. If you would like clarification on any of these responses or would like to ask additional questions about NTEWS, please do not hesitate to contact me at your convenience. I can be reached by email at jfinamor@nsf.gov or by phone at (703) 292-2258.

Sincerely,

John Finamore
Chief Statistician
National Center for Science and Engineering Statistics

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Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue, Suite W18200
Alexandria, Virginia 22314

June 15, 2020

Comment on the National Training, Education, and Workforce Survey (OMB control no. 3145-NEW)

Dear Ms. Plimpton and Colleagues:

First of all, I want to emphasize that I **strongly recommend** that OMB allow the National Science Foundation to proceed with this information collection request. Even in its current form, the data it will generate will be of incredible value to the research community and provide insights necessary for policymakers to understand the extent and value of all types of credentials in the American workforce. The below suggestions are intended to help the National Center for Science and Engineering Statistics improve an incredibly valuable ICR as it prepares to finalize the survey instrument.

In many respects, the research community is looking to the NTEWS to carry on the work of the Interagency Working Group on Expanded Measures of Enrollment and Attainment (GEMEnA). Among the many accomplishments of GEMEnA was the creation and adoption of a common language across federal survey research programs for describing non-degree credentials (often referred to as “alternative credentials” in GEMEnA documents). I believe that it is vital for the NTEWS to carry forward as many of the indicators of credential attainment, quality and value that were adopted for the GEMEnA surveys as possible going forward to ensure that researchers will be able to identify longitudinal trends in the attainment and value of credentials. Therefore, the most urgent point that I would like to raise is that the **utility of the NTEWS could be maximized for the research community by importing more survey items from the Department of Education’s Adult Training and Education Survey (ATES) and NCSES’s National Survey of College Graduates (NSCG).**

Specifically, I encourage NCSES to explore the feasibility of adding the following items from the ATES and NSCG to the draft NTEWS survey instrument:

- ATES Item 15, parts A through D, Item 24, parts A through D, and Item 38, A through C. These items, which ask respondents to identify the perceived labor market value of their two most important certifications or licenses, provide essential measures of the utility of non-degree credentials. Including these items on the NTEWS would give researchers essential data points about whether the value of non-degree credentials changed for workers between 2016 and 2021, which may also help us to understand the relative value of credentials in a strong labor market relative to times of economic distress should the United States remain in a recession when the NTEWS is in the field.
- ATES Item 51, regarding labor union membership. Understanding the relationship between union membership and credential attainment in the skilled technical workforce could be extremely helpful to the Department of Labor as it explores options for upskilling the non-college workforce.
- NSCG (2019) Item A46, regarding the reasons that one pursued a particular certification or license. This should be repeated for each certification and license reported on the NTEWS. Asking this will provide useful insights regarding any differences in the motivations of the sub-

baccalaureate workforce for attaining non-degree credentials relative to peers who hold a college degree.

- NSCG (2019) Item A48, regarding whether an employer contributed to the cost of credential attainment. This should be asked for each certification and license reported on the NTEWS, and ideally would be modified to ask respondents to indicate the percentage of direct costs that were covered by their employer.
- NSCG (2019) Section C, all questions. These items extend beyond the attainment of non-degree credentials, but are vital for understanding the work-related context in which individuals choose (or do not choose) to pursue credentialing opportunities. While the receipt of employer-sponsored, non-credentialed training is an obvious alternative to earning a certification or license in some situations, it is also important to know how attendance at meetings and association membership is related to certification attainment.
 - I will also note that knowing more about association membership and meeting attendance in the sub-baccalaureate workforce is important for understanding patterns of occupational engagement and professional development within the skilled technical workforce. Having estimates from the sub-baccalaureate portion of the NTEWS sample to compare to the NSCG would provide data points on trends in association membership and meeting attendance that would be very valuable to professional societies in STEM and allied disciplines.

I also encourage the NCSES to reevaluate the response choices provided for Item 47, “Do you use this certification for your MAIN job?” Asking respondents to choose yes or no may not give researchers a full and accurate picture of the level of variation that exists in the use of non-degree credentials on-the job. I suggest offering intermediate choices, which might include allowing individuals to describe how often they use knowledge from a credential: for example, responses could include “Every day,” “At least once a week, but not every day,” “Less than once a month,” and “Never.”

I also suggest asking whether each credential reported was obtained through distance learning or a hybrid online/in-person format. Collecting additional data points about the prevalence of distance learning within the skilled technical workforce would add to the evidence base used to justify the expansion of such programs, especially for workers from socioeconomically disadvantaged backgrounds.

Moreover, researchers would benefit from the addition of items about the extent to which all credentials respondents are asked to list on the NTEWS – degree or non-degree – were supported by employer tuition aid programs. Realistically, this could be asked as two part question – the first part asking if the respondent had access to tuition assistance benefits at work, and the second part asking if the respondent has used employer tuition assistance for any type of credential since starting at their current employer.

Finally, I also want to endorse the points made in the “consensus” letter signed by myself and members of the Non-Degree Credentials Research Network. Specifically, I want to encourage NCSES to plan for more aggressive dissemination and outreach activities with the research community than it has done in the past with its flagship surveys, such as the NSCG. NCSES also should be mindful of opportunities to gauge the competitiveness of the US skilled technical workforce relative to the workforces of other countries in its survey designs, which may include consulting with foreign statistical agencies to work toward common definitions of non-degree attainment. The 2022 Eurostat Adult Education Survey is probably among the most important surveys to review in this regard, though NCSES may wish to commission research examining how other countries are accommodating the rise of non-degree attainment in their programs of survey research.

To conclude, I would like to reiterate that the above recommendations – perhaps more of a wish list from a research perspective - are intended to stimulate efforts to improve the quality of the NTEWS survey instrument in the limited time remaining before the survey goes into the field. Regardless of NCSES's ability to implement these recommendations, I strongly recommend the **approval** of this information collection request.

Best regards,

Kyle W. Albert



(FRN COMMENT #4)

September 24, 2021

Dear Kyle Albert,

Thank you for responding to the National Center for Science and Engineering Statistics (NCSES) within the National Science Foundation call for comments published in the *Federal Register* on April 16, 2020 (FR Doc. 2020-08067), which announced our plan to ask the Office of Management and Budget for authority to conduct the National Training, Education, and Workforce Survey (NTEWS). The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment.

We appreciate your feedback on the value of the Interagency Working Group on Expanded Measures of Enrollment and Attainment (GEMEnA) work to federal statistical agencies seeking to describe and measure non-degree credentials better. We hear the overall theme of your comments that, as much as possible, NCSES and NCES should optimally aim to incorporate more survey items that target non-degree credentials from NCES' Adult Training and Education Survey (ATES) and NCSES's National Survey of College Graduates (NSCG). For the first cycle of the NTEWS, both cosponsoring agencies believe that we have accomplished this objective for 2021 NTEWS. Survey items from either the ATES or NSCG that do not appear in the NTEWS have not measured the intended concept well, or do not address either agency's research questions. The research questions that both agencies are trying to answer with NTEWS data collection are:

	NCSES Research Questions	NCES Research Questions
1	What are the demographic characteristics of the STW?	How many adults, and which adults, have an education and/or work credential, or some combination of credentials?
2	What is the prevalence and role of education and/or credentials for the STW?	How do work and education credentials interact (e.g., to what extent do adults at each educational attainment level have a work credential)? To what extent do work credentials supplement versus supplant higher education?
3	Do education and/or credentials influence an individual's ability to enter, maintain relevance, and seek advancement in the STW?	To what extent is the formal education system involved in providing training for work credentials, and what level of education is involved?

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4	What are the employment characteristics of the STW?	How is the attainment of a work credential related to key employment outcomes (e.g., unemployment, under-employment, earnings, job satisfaction)?
5	What are the employment outcomes of the STW?	How many adults, and which adults, are in the pipeline to earn a license or certification for the first time?
6	How is education and/or credential attainment related to employment outcomes?	What role does credential attainment play in adults' entry, advancement, and mobility in the labor market?
7	[Intentionally Left Blank]	To what extent do adults work in fields related to their credential?

Also, we judiciously have to weigh the burden of the survey on the respondents against researchers' desire for extensive information. With that caveat in mind, as the NTEWS collection moves forward, we will consider your specific suggestions for additional questionnaire items from the ATEs and NSCG. Please see our responses to your specific comments:

1. We excluded the ATEs 15 (certification or license), ATEs 24 (second certification or license), and ATEs 38 (certificate) questions because these questions were too long and increased the burden on the respondent.
2. In the 6/2/2020 version of the survey you reviewed, we decided not to include the ATEs 51 (union member) question for the initial NTEWS survey cycle for the reasons of shortening the survey length, and the question ranked in lower when compared to other survey items that answered the agencies' research questions. However, we will consider adding it back as this question tested well in previous cognitive interviews.
3. The 6/2/2020 version of the survey that you reviewed did not include NSCG A46, but we conducted cognitive testing to develop a survey item similar to A46. Based on our cognitive research, we have added onto the NTEWS a question for each credential addressing why they obtained that credential.
4. We believe that information on costs is an important but complicated topic that requires more investigation. The 6/2/2020 version of the survey that you reviewed did not include a cost question on the extent of the costs associated with earning a credentials (i.e., understanding the employer's contribution to finance the respondent's training, education, and credential fee). Since then, we have cognitively tested a new cost question to understand the various financial sources that help individuals finance various credentials. We added this question for each credential type to the initial NTEWS survey cycle.

5. Adding questions similar to NSCG Part C – Other Work-Related Experiences is on hold until NCSES and NCES have established a baseline survey of data that measures credentials of more immediate national attention, which are licenses, certifications, certifications, and work experience programs. We understand that there is a vast network of credentials offered by a diverse array of providers. It is essential for our agencies to first establish a baseline level of information before exploring other work-related experiences.
6. We see your point about understanding the association membership of those with have a sub-baccalaureate education. Associations can help individuals' network and support members' professional goals. However, we think that this question should be considered for future cycles of the NTEWS, while minimizing burden on respondents.
7. Question 47 certification (along with Q34 license and Q68 certificate), do you use this credential for your MAIN job is a placeholder for the NSCG A46 question was missing from the draft because we had plans to cognitively test it. From our cognitive testings, we developed a variety of response options of reasons for obtaining the work-related credential instead of a yes or no response. This new question was added to the initial NTEWS cycle.
8. We will consider developing a survey item for future NTEWS survey cycles that investigates if the credential's training or education was provided through distance learning for future NTEWS cycles. Increasing offering and enrollment of distance learning in its various forms has garnered the attention of policy makers and researchers. The impact of the COVID-19 pandemic has only driven more individuals to learn and obtain a credential via distance education methods.
9. Thank you for the suggestion to investigate the employer benefit of tuition-aided programs as well as offering a possible solution to measure this benefit in two parts: 1) if the benefit is provided to the employee and 2) if the employee uses the benefit for their work-related credential(s). The initial cycle NTEWS has a general question on benefits, which is in the Current Employment section. We agree that investigating employer support is important and will consider the best options for assessing this concept as part of future cognitive testing.
10. We have received several comments that also support your suggestion to look into Eurostat's Adult Education survey. Thank you for your reference to a specific Eurostat survey to examine. We will review that instrument as we prepare for future NTEWS survey cycles. We are excited that there could be potential international comparisons.
11. We appreciate your suggestion for NCSES to be more aggressive in its data dissemination and outreach activities. NCSES is always exploring for areas to improve stakeholders' experience and understanding of NCSES data.

Thank you again for your comments to help improve NTEWS data and its usefulness to the research community. We also appreciate your strong recommendation for the NTEWS data collection. As a new survey, NCSES believes that NTEWS benefits from feedback from stakeholders, researchers, and policy makers. If you would like clarification on any of these responses or would like to ask additional questions about NTEWS, please do not hesitate to contact me at your convenience. I can be reached by email at jfinamor@nsf.gov or by phone at (703) 292-2258.

Sincerely,

John Finamore
Chief Statistician
National Center for Science and Engineering Statistics

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Suzanne H. Plimpton, Reports Clearance Officer
National Science Foundation
2415 Eisenhower Avenue, Suite W18200
Alexandria, Virginia 22314

June 15, 2020

Dear Ms. Plimpton and Colleagues:

Workcred, a non-profit affiliate of the American National Standards Institute, with a mission of to strengthen workforce quality by improving the credentialing system, ensuring its ongoing relevance, and preparing employers, workers, educators, and governments to use it effectively, would like to provide the following comments of the planned information collection request (ICR) for the National Education, Training, and Workforce Survey (NTEWS), OMB control number 3145-NEW, proposed by the National Center for Science and Engineering Statistics (NCSES) of the National Science Foundation (per [85 FR 21271](#)).

We believe that the NTEWS promises to be an essential source of data on phenomena of interest to Workcred, including the prevalence of credentials not captured in federal data sources related to college degrees, inequality in who attains such credentials, and the relationship between credential attainment and labor market outcomes such as salary and job satisfaction. Its longitudinal nature will also permit us to track whether attainment is increasing or declining over time, which will help policymakers understand the changing value of non-degree credentials in the overall labor market.

In addition, we think that the NTEWS also represents a promising transition on the part of the National Science Foundation away from focusing on the population of individuals who hold a baccalaureate degree in favor of recognizing the contributions to the American scientific and engineering enterprise made by skilled workers without a bachelor's degree. By doing so, NCSES is collecting data that will be needed to plan and evaluate potential new public policies that promise to increase the attainment of sub-baccalaureate credentials, including the Department of Labor's efforts to introduce Industry-Recognized Apprenticeship Programs and the expansion of Pell grants for short-term training programs. With this in mind, we offer comments to NCSES to clarify the questions and terminology used in the survey. In particular, we encourage NCSES to consider the following comments on specific survey questions:

Question #13

The question states "...what are your most important duties or activities." We suggest making the language in the question consistent with the header located about the answer box. Either use "activities

and duties” or “activities or duties.” Also, NCES might consider adding a drop-down menu of example activities and/or duties to help the survey respondent appropriately complete the survey.

Question #14

NCES might consider adding “social and cultural working environment” as an additional answer choice. For many people, it is the social and cultural working environment that cause dissatisfaction with their job.

Question #18

NCES might consider updating the examples used in question #18 to make them more aligned with what the question is asking. Examples of business or industry could include: Education, IT services, Residential Construction.

Question #20

This question is the same as question #18. We suggest that it be deleted.

Question #22

Workcred suggests that the answers grouped together in the “other category” be separated. The revised answers could be: “Manufacturing, Wholesale Trade, Retail Trade, Agriculture, Construction, Service, Government, and Other.” The “other” category is too broad and the answer will not provide useful information.

Question #23

Workcred suggests that NCES revise question #23 to the following: “Do you have a CURRENTLY ACTIVE local, state, or federal license?” Most licenses are issued by local, state, and federal government entities. Industries do not issue licenses. NCES might also consider adding driver’s licenses for personal vehicles to the list of licenses that should not be included when answering this question.

Question #25

Workcred suggests that NCES consider eliminating this question. The reason that individuals obtain a license is because it is required to practice a specific occupation. There is a cost associated with obtaining and maintaining a license.

Question #29

Workcred suggests that NCES either eliminate this question or restructure it to focus on whether the individual is using their license for their primary job or another job. As stated above, occupations that have licenses mean that an individual cannot practice that occupation without obtaining the license. There is a legal ramification to this type of credential.

Question #30

Question #30 asks about the entity that issues the license. Workcred suggest eliminating “professional and trade organization” as one of the answers. Professional and trade organizations do not issue

licenses. The examples given, the American Culinary Federation and CompTIA issue certifications not licenses. In addition, Workcred suggests eliminating “business or company” as an answer choice. Businesses and companies do not issue licenses for people. Instead, they may issue licensing agreements for products and services.

Question #34

This question is similar to question #29. NCES should consider using either question #29 or #34 to ask whether a license is used for the respondent’s main job.

Question #43

For answer #2 “business or company,” Workcred suggests adding examples of companies that issue personnel certifications such as Microsoft, Cisco, or CrossFit)

Question #48

Is the purpose of this question to only address learning that occurred in schools? If not, there are other ways for individuals to obtain the skills and knowledge that prepare an individual to sit for a certification. These include apprenticeships, boot camps, professional societies, trade associations, and study materials provided by certification bodies. NCES might consider broadening the opportunities where individuals can learn the knowledge and skills that prepare them to sit for a certification.

Question #57

Workcred suggests that NCES consider removing the word “formal” from the question. It is unclear what is meant by “formal training from a coworker or mentor.”

Question #63

Vocational certificates are offered by a variety of entities outside of the formal education system. For example, vocational certificates may be offered by professional or industry associations. Workcred suggests that the options outlined in the question be expanded to include professional and industry associations.

Question #87

There are several other answer options that may be added to better understand the career paths of individuals with different types of limitations. Workcred suggests adding depth perception, sensory deficits, and dexterity, since these capabilities are considerations in occupational choice. Suggested language includes:

- FINE DEXTERITY to perform tasks that require coordination of small muscle movements to accomplish detailed tasks
- DEPTH PERCEPTION to be able to judge spatial relations of objects and move one’s body in the work environment
- SENSORY DEFICITS to feel or touch objects and manipulate them without the use of vision and to prevent bodily injury

Thank you for the opportunity to comment on the draft NTEWS ICR. Again, we strongly support NCSES' development of NTEWS and hope that NCSES finds our suggestions of interest and value.

Best regards,

A handwritten signature in black ink that reads "Roy A. Swift". The signature is written in a cursive, slightly slanted style.

Roy Swift, Executive Director
Workcred



(FRN COMMENT #5)

September 24, 2021

Roy Swift
Executive Director
Workcred, a non-profit affiliate of the American National Standards Institute

Dear Roy,

Thank you for responding to the National Center for Science and Engineering Statistics (NCSSES) within the National Science Foundation call for comments published in the *Federal Register* on April 16, 2020 (FR Doc. 2020-08067), which announced our plan to ask the Office of Management and Budget for authority to conduct the National Training, Education, and Workforce Survey (NTEWS). The Paperwork Reduction Act (PRA) provides an opportunity for an open and public comment period where comments on collections can be made. We are grateful for this process and your comment. Please see our responses to your comments for the following survey questions:

Question 13. We will make the recommended change to “activities or duties” for consistency as well as align with what is used in the American Community Survey (ACS). A drop-down menu would be applicable only for the online version of NTEWS. We will consult with our expert survey methodologists and web developers if a drop-down list of examples should be used, which will be based on best practices for online federal surveys.

Question 14. We will consider this possible job characteristic (social and cultural working environment) for future NTEWS cycles. Considering the current pandemic, we are uncertain how this measure would perform, and we would need to test it.

Question 18. We will consider testing these examples to describe the MAIN BUSINESS OR INDUSTRY for future cycles of NTEWS. This exact language comes from the ACS. NCSSES is interested in keeping it intact to remain consistent with the ACS, which serves as the sampling frame for NTEWS. Also, in the summer of 2018, we tested this survey item, and it performs well with these examples.

Question 20. You are correct that this question is the same as question 18. However, the draft version was incorrect. Question 18 is supposed to be for self-employed respondents, and the stem of the question is, “What is your MAIN BUSINESS OR INDUSTRY...”. Our apologies for the confusion.

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Question 22. This question is the exact question used in the ACS. This question will help with back-end coding and validating ACS responses—specifically, to help clarify a respondent’s answer. For example, if a respondent states that her business or industry is “shoes,” this question helps to determine if that response refers to manufacturing shoes, the wholesale trade of shoes, or the retail trade of shoes. We appreciate your suggestion to improve the question, but we decided to use the question as used on the ACS.

Question 23. We based this question on ATEES question 6. We have revised this question stem wording slightly and will evaluate its measurement quality in the 2021 NTEWS. We had many conversations about the possible misinterpretation of respondents considering personal driver’s license and marriage license a work-related license. We will consider investigating what “industry licensing” means to the respondent as well as your suggested wording for future testing and cycles should the current wording produce poor data.

Question 25. We appreciate your insights on this recommendation, and we have cognitively tested this question, which performed well. We made a slight wording adjustment, but the question remains intact for the initial NTEWS cycle because we need the individual to confirm that they obtained the credential for work-related reasons.

Question 29. We have revised this question to a yes or no response instead of using the three response options that you reviewed in the 6/2/2020 draft. We agree that there are legal consequences if one does not hold a license to perform the work. Question 34 serves to understand if the license is used for the MAIN job.

Question 30. This question is a variation of the NSCG question A45, noting that the only difference is NTEWS expanded the levels of government. We will evaluate if either or both “professional or trade association” or “business or company” should be deleted from the first cycle or future cycles.

Question 34. This question will be revised to have a variety of response options that describes the reasons for holding the work-related credential. The survey item you reviewed in the provided 6/2/2020 draft was not intended to be final but a placeholder for a version that will provide more helpful information. After cognitive testing, we have finalized the response options that performed well with individuals.

Question 43. We had deliberately reduced the examples for space and survey exhaustion reasons. This question is a slight variation from NSCG question A45, and as a survey item that has been in use for several collection cycles, we will use the same survey item for NTEWS. However, we will consider your suggestion for future collections of NTEWS.

Question 48. Yes, the purpose is to understand if the skills and knowledge were obtained through schools.

Question 57. The word “formal” in “formal training from a coworker or mentor” while in a work experience program was intentionally included to distinguish from informal or unstructured occurrences of mentoring. This question had tested well throughout our cognitive testing. We prefer to keep the word in the stem of the question and let the respondent determine if applicable.

Question 63. We designed this question, in combination with Question 64, to identify the respondents who have a certificate from a postsecondary institution.

Question 87. To maintain comparability, this survey question, which is used in other NCSES surveys, cannot be changed. NCSES uses this survey question to produce trend and snapshot information for the NCSES congressional report *Women, Minorities, and People with Disabilities*.

Thank you again for your comments and your strong support for the new NTEWS data collection. As a new survey, NCSES believes that NTEWS benefits from feedback from stakeholders, researchers, and policy makers. If you would like clarification on any of these responses or would like to ask additional questions about NTEWS, please do not hesitate to contact me at your convenience. I can be reached by email at jfinamor@nsf.gov or by phone at (703) 292-2258.

Sincerely,

John Finamore
Chief Statistician
National Center for Science and Engineering Statistics