



August 24, 2021

Mr. Steven Rietzke
Chief, Division of National Programs, Tools, and Technical Assistance
Employment and Training Administration
U.S. Department of Labor
Room C-4510
200 Constitution Ave. NW
Washington, DC 20210

Via: wiac@dol.gov and rietzke.steven@dol.gov

RE: Request for Comments for the Workforce Information Advisory Council (86 Federal Register 41518)

Dear Mr. Rietzke,

I am pleased to respond to the Employment and Training Administration's Request for Comments for the Workforce Information Advisory Council (WIAC). A call for comments was published in the *Federal Register* on August 2, 2021.

As the strategy director for data and measurement at Lumina Foundation, an independent, private foundation in Indianapolis that is committed to making opportunities for learning beyond high school available to all, I focus on ensuring data advances our collective understanding with a particular focus on the intersection of education and workforce data.

In an ever-changing world, the need for our nation's competitiveness is ever more pressing. The need for further education and training for existing and incumbent workers will only increase as technological advancements reshape the nature of work. Over the past decade the evolution in postsecondary education is the positioning of programs as the unit of analysis, making them as important as the institution. This is to say what one studies is nearly as important as where one pursues education and training beyond high school.

As such, postsecondary education and providers of short-term credentials need reliable intelligence to ensure their offerings are targeted to the needs of employers. A critical component in that dialogue is occupational projection data. The data Labor Market Information offices provide is critical, but in places insufficient to create an aligned education and workforce system. Any effort to strengthen data from these offices in support of America's economic competitiveness is laudable.

Furthermore, there are rich data sources that allow for greater alignment between education and training and the workplace that have already advanced our collective understanding. WIAC previously completed reviews of data sources that have been of substantial value to the field. The value of this listing of data sources would be of greater benefit if additional federal data sources, such as those in appendix A, were included and located on the internet for a broader audience to engage. As such, we propose that WIAC consider updating the 2018 document titled "Federal-State Workforce and Labor Market Information System (WLMIS)," including information similar to that included in the October 8, 2014 WIAC document titled "Public and Private Sources of Education and Workforce Data."

Lumina Foundation remains committed to the use of data to advance learning. In closing we would like to commend the Employment and Training Administration for their requesting comments to inform the work of the Workforce Investment Advisory Council. Data is ubiquitous and our ability to capture, categorize, and longitudinally link it together to advance our collective understanding is paramount to creating a more perfect union.

I appreciate the opportunity to comment and hope you find them of value.

Sincerely,

A handwritten signature in dark blue ink, appearing to read 'C. Mullin'.

Christopher M. Mullin, Ph.D.
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Appendix A. Sample of Federal Data Sources for Inclusion

1. Census' Postsecondary Employment Outcomes
2. Census' Household Pulse Survey
3. Census' Small Business Pulse Survey
4. Census' CPS Contingent Worker Supplement
5. HHS's National Directory of New Hires
6. DOL's State Wage Interchange System
7. DOL's Common Reporting Information System
8. DOL's Training Provider Results
9. NSF's National Training, Education and Workforce Survey
10. NSF's National Survey of Recent College Graduates
11. ED's College Scorecard
12. NCES' Beginning Postsecondary Students Longitudinal Survey
13. NCES' National Postsecondary Student Aid Survey
14. NCES' National Postsecondary Student Aid Survey (2016 state administrative data collection)
15. NCES' Postsecondary Education Transcript Collections
16. OPE's Federal Student Aid, Student Aid Data
17. OPE's Federal Student Aid, School Data