

# BROOKINGS

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Metropolitan Policy  
Program

Office of Information and Regulatory Affairs  
Attn: OMB Desk Officer for the Department of Labor-ETA  
Office of Management and Budget, Room 10235  
Washington, DC 20503  
[OIRA\\_submission@omb.eop.gov](mailto:OIRA_submission@omb.eop.gov)

RE: Comments in response to ETA Proposed O\*Net Data Collection Program

Dear OMB Desk Officer for ETA,

We, the undersigned, are writing in response to the Federal Register notice (December 31, 2008) regarding the proposed extension of the Employment and Training Administration's O\*Net Data Collection Program. We appreciate this opportunity to voice our strong support for ETA's O\*Net and to suggest ways in which we believe this important resource can be even further improved.

We find that O\*Net is indispensable to the development of the nation's workforce. By providing a common taxonomy and highly detailed information on the characteristics of 800 occupations, O\*Net:

- serves as the foundation for critical workforce delivery systems,
- enables interaction and cooperation across the workforce development community, and,
- most importantly, allows jobseekers, employers, educators, and workforce professionals to make more informed choices.

O\*Net's methodology is appropriate and sophisticated. Recognizing that O\*Net's development is a unique accomplishment, other nations have adapted the O\*Net database for use in their own education, career guidance and employment operations. We are pleased to wholeheartedly endorse OMB's approval of an extension for the O\*Net Data Collection Program.

At the same time, we offer a series of observations and requests regarding the O\*Net-SOC taxonomy, the O\*Net budget, and the O\*Net OnLine tool. While we recognize that comments on the latter two topics are not in the immediate purview of OMB's Paperwork Reduction Act review, we believe it to be appropriate to bring our observations to OMB's attention.

The O\*Net Data Collection Program supporting statement indicates:

The O\*NET-SOC comprises occupations at the most detailed level of the SOC and includes additional occupational specificity as needed. In addition, new and emerging occupations in high-growth sectors of the economy are being identified and added to the taxonomy. So far, data have been published for 780 O\*NET-SOC occupations. This request is to continue to collect new data on selected high-growth occupations, together with new and emerging O\*NET-SOC occupations, over the next 3 years (calendar years 2009 to 2011), subject to annual budget levels. (Section A.1)

In light of changing occupational structures, we strongly recommend that OMB approve this request to collect new data. As our economy changes, so does our workforce, and the taxonomy that forms the foundation for our occupational information systems should be adjusted accordingly. We want to avoid having a large portion of our growing occupations end up in miscellaneous classifications, or worse, not being classified at all. Such a situation undermines the usefulness and integrity of O\*Net.

As part of the new data collection effort, therefore, we ask that ETA expand the O\*NET-SOC taxonomy to include a more detailed listing of information technology (IT) and environmental (“green”) jobs. We find that the current IT occupations are too broad to be relevant to actual market needs. A more detailed list of green jobs would allow O\*NET to better support the Administration’s aim of energy independence and job creation in this important sector.

We also suggest that ETA consider reviewing existing O\*Net-SOC occupations to identify declining ones that might be combined or eliminated. Any savings could be applied to gathering new information for growing occupations.

The current annual expenditure for the O\*Net Data Collection, \$4.6 million, is minimal relative to the significant value delivered. Despite this substantial return on taxpayer investment, we find that the current budget level limits the reliability and useful detail of O\*Net. First, we find that the time-phased method by which ETA updates the scores of occupational attributes leads to serious inconsistencies, particularly incongruities between the scores assigned to the various occupations and radical and inexplicable shifts in scoring of attributes for the same occupation between different versions of O\*NET (e.g., O\*NET12 and O\*NET13). ETA must rely on the time-phased method due to insufficient funds to re-assess all attributes of all occupations by the same methodology in a single updating of the database.

Second, we find that the utility of O\*Net is limited by the inability to identify differences in occupational attributes in light of worker characteristics such as job experience, age, or educational attainment. O\*Net’s current sample size does not allow such analysis. A larger sample, and so larger budget, is needed to enable this level of disaggregated analysis, which would be beneficial to the full array of O\*Net users. In particular, it would allow for significantly better decision support for “hard to serve” populations.

In consequence, we recommend that ETA request sufficient funding for O\*NET in fiscal year 2011 to permit across-the-board re-assessments of all O\*NET Skills, Knowledge, and Abilities according to a single methodology within a single update cycle and to allow sample size sufficient to disaggregate characteristics within occupations. We recognize that an increase in funding would lead to a change in the O\*Net Data Collection Program, which in turn would require an additional information collection request to OMB.

We request several improvements to O\*Net OnLine, the tool for accessing O\*Net data. While O\*Net OnLine is oriented, as it should be, to aiding individuals, we believe that its utility for research, education, and workforce development should be increased. Specifically:

- We strongly suggest that the functionality of O\*Net OnLine be enhanced for more effective use by researchers and analysts in examining trends across multiple occupations and occupational categories. At present, the website functionality is designed for use by and on behalf of individuals. We encourage ETA to learn from researchers, educators, and workforce developers—whether by survey, focus group, or usability test—how O\*Net OnLine could be designed to better meet these users' needs.
- We request that ETA provide time series information in O\*Net OnLine. O\*Net has been in existence for a sufficient number of years to allow trend analysis of occupational characteristics. The capacity to track trends will be very valuable to career counselors, educators, researchers, and workforce developers as they monitor occupational trends and project how those trends will influence future employer demand. (At the same time, as noted, we recognize that the time-phased method of data collection will cause anomalies in some time series.)
- To aid user understanding of labor market dynamics, we suggest that O\*Net OnLine include for each occupation the frequency distribution by educational attainment category. We recognize that this distribution will be less than ideal in that non-degree credentials are not included.
- For reasons identified above, we encourage ETA to add an environmental jobs cluster to O\*Net OnLine.
- So that researchers may more productively analyze O\*Net data, we ask that ETA publish rules for aggregating characteristics of multiple occupations into major occupational groups.

In summary, we ask that ETA expand the O\*NET-SOC taxonomy to include a more detailed listing of IT and green jobs; request funds for FY2011 sufficient to support a larger sample and the annual re-assessment of occupational skills, knowledge, and abilities; and improve the functionality of O\*Net OnLine to better serve researchers, educators, and workforce developers.

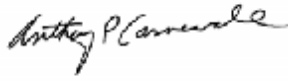
We thank you for your attention to our comments. Again, we strongly support OMB's approval of the extension of the O\*Net Data Collection Program. We also request that

you encourage ETA to consider our detailed comments. We would be pleased to speak with ETA staff to discuss our ideas further.

Sincerely,



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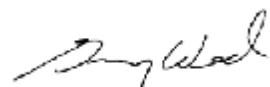
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