December 12, 2022

Mr. Scott Gibbons
Chief Data Officer
Office of the Assistant Secretary for Policy
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Dear Mr. Gibbons:

On behalf of Big Thought, Opportunity@Work, Year Up Inc., and America Forward, we are writing in response to the Department of Labor's ("DOL") "Request for information on design and implementation features for open data services provided by the Department of Labor" (Docket No. DOL-2021-0005). Each of our organizations is deeply engaged in the workforce and education system, and we write with recommendations regarding data around micro-credentials:

- Big Thought is an impact education nonprofit focused on closing the opportunity gap through programs which equip students to imagine and create their best lives and world.
- Opportunity@Work researches and provides tech-enabled solutions to solve the opportunity gap and rally public, private, and nonprofit partners to rewire the labor market so that everyone can contribute their skills, talent, and energy in pursuit of a better life.
- Year Up Inc. is a workforce development organization committed to ensuring equitable access to economic opportunity, education, and justice for all young adults—no matter their background, income, or zip code.
- America Forward is the nonpartisan policy initiative of the national venture philanthropy organization New Profit and leads the America Forward Coalition, a network of over 100 social innovation organizations– including Big Thought, Opportunity@Work, and Year Up Inc.– that champion innovative, effective, and efficient solutions to our country's most pressing social problems.

We appreciate the opportunity to provide input on these important issues. Our comments relate to the following categories in the Department's RFI: #1 Data content and format; #2 Data documentation; #3 Data formats specific to certain analysis patterns; #5 Challenges with data comparability; #6 Identifying data sets that are currently useful and merit prioritization in forthcoming open data efforts; and #10 Specific data sets and methodologies.

We write to recommend that DOL convene a formal effort to develop standards and methods regarding the collection and sharing of micro-credentials in partnership with the Department of Education (ED) and Department of Commerce (DOC), including data and reporting on these credentials. As a starting point, we propose DOL, ED, and DOC launch a communities of practice effort to assess the current landscape for micro-credentials efforts, synthesize lessons learned, elevate effective models, and recommend best practices for the field moving forward. We suggest including stakeholders such as the following in a series of meetings:

- Social innovation/community-based organizations
- Industry leaders and employers

- Talent developers
- K-12 education leaders
- Higher education leaders
- Workforce system leaders
- Research institutions
- Youth, adults, and family representatives

As research supported by DOL has identified, micro-credentials offer the potential to promote economic mobility by enabling job seekers—ranging from youth to older adults--to demonstrate their skills, find a job, and progress along their career path.[1] Micro-credentials have emerged in response to the ongoing of transformation of the labor market, which requires educational, community-based organizations, and other stakeholders to shift how they prepare youth and support adults for the future. Critically, these micro-credentials have the potential to capture not only discrete technical skills, but also the "soft skills" or "21st century" skills that are essential for future and career and life success. Many industries have named creativity, emotional intelligence, judgment and decision making, and cognitive flexibility as examples of 21st century skills.

As workers pursue new opportunities, micro-credentials can help them identify and hone new skills and build their learning and employment records (LER) to showcase and validate their skills. These new credentials are also invaluable to support skills-based hiring by reimagining how jobseekers' job application profiles can demonstrate their skills in an externally verifiable way. As DOL has recognized, expanding skills-based hiring is essential, particularly to expand opportunities for the more than 70 million U.S. workers who are Skilled Through Alternative Routes (STARs) as opposed to holding bachelor's degrees.[2]

Today, education institutions; non-profit organizations; employers and other for-profit corporations; and agencies at each level of government have all launched an array of methods to capture the skills that learners have mastered and enable learners to demonstrate their mastery throughout their lives and careers, as an extensive policy map by Digital Promise demonstrates.[3] For instance, a 2021 report by Credential Engine identified 381,561 available digital badges issued by non-academic providers alone.[4]

We believe these diverse efforts would benefit from a more concerted effort by federal agencies to support and elevate best practices moving forward—critically, including data and reporting standards for micro-credentials—setting the stage for further collaboration that supports effective learning and career pathways. In 2022, while micro-credentials are being used by sectors and industries throughout the world, the systems and processes to facilitate the credentials are not connected nor engaged. As a result, micro-credentials have been rapidly developed and deployed to various sectors and industries and not necessarily built with evidence-based research and practices, limiting their impact and slowing

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[1] Maxwell et al (2017), "Micro-Credentials: Do They Hold Promise for Low-Skilled Workers?," Mathematica Policy Research, prepared for the U.S. Department of Labor,
https://www.mathematica.org/publications/micro-credentials-do-they-hold-promise-for-low-skilled-workers.
[2] Opportunity@Work (2020), *Navigating with the STARS: Reimagining Equitable Pathways to Mobility*,
https://opportunityatwork.org/wp-content/uploads/2020/12/Navigating-with-the-STARs.pdf.
[3] Digital Promise, "Micro-credential Policy Map,"
https://digitalpromise.org/initiative/educator-micro-credentials/micro-credential-policy-map/.
[4] Credential Engine (2021), "Counting U.S. Postsecondary and Secondary Credentials,"
https://credentialengine.org/wp-content/uploads/2021/02/Counting-Credentials-2021.pdf.

employers' buy-in. We need more evidence on which micro-credential strategies work for diverse populations of learners, and more central support to hone and expand effective models.

We believe now is an excellent time for DOL and ED to build on past efforts and partner with the field to set a path forward. An array of past efforts at both agencies have supported new innovations in credentials, ranging from DOL grants enabling the development of micro-credentials—such as under the Strengthening Community Colleges Training Grants Program—to ED's Pathways to Credentials Technical Assistance Cohort. Moving forward, we believe this new effort on micro-credentials would align well with DOL and ED's new Raise the Bar: Unlocking Career Success initiative in partnership with the Department of Commerce, supporting that initiative's skills-based learning and training pathways efforts. Ultimately, we believe DOL and ED have the opportunity to bring together the field and accelerate recognition of micro-credentials between the labor market and education system, promoting the usefulness and usability of micro-credentials across sectors.

We appreciate the opportunity to respond to this RFI and would welcome a meeting to discuss our recommendations further. We look forward to continuing to support the Department's critical work in this area.

For further questions, please contact Shannon Epner at shannon.epner@bigthought.org.

Sincerely,

Big Thought
Opportunity@Work
Year Up Inc.
America Forward

About Big Thought
Big Thought is an impact education nonprofit focused on closing the opportunity gap through programs which equip students to imagine and create their best lives and world. Nationally recognized for its innovations in creative learning, collective impact collaborations, after school and summer learning, and social and emotional skill-building, Big Thought delivers direct-to-youth programming, learning system facilitation and consultation services supporting best practices in education. Through learning and career pathways, Big Thought aims to create a world in which the skills youth develop out of school are more visible and leveraged as assets in pursuit of a future of their choosing. Micro-credentials (e.g., Digital Badges, Alternative Credits) are the tool/mechanism utilized to define, measure, and fulfill pathways.

For Big Thought, learning and career pathways is a collaboration between youth & community members, community-based organizations & program providers, and higher education & workforce stakeholders. Through collaboration, organizations and stakeholders implement evidence based best practices, make skill development visible through high-quality micro-credentials and programming, and ensure that skill development is transferable between different industries and fields. Our goal is to bridge the space between formal and informal education systems, workforce, higher education systems, and communities to ensure youth are connected and prepared to build their best lives and world.

About Opportunity@Work
Opportunity@Work is a nonprofit social enterprise focused on increasing career opportunities for the more than 70+ million STARs in the U.S. — those workers who are Skilled Through Alternative Routes rather than a bachelor's degree. We are building the business case and infrastructure for employers to implement skills-based, inclusive hiring and for millions of STARs to access higher-wage jobs, and seek to create an equitable economy in which STARs – among whom are the majority of Black, Hispanic, veteran, and rural workers – achieve greater upward economic mobility.

About Year Up Inc.
Year Up is a national 501(c)3 workforce development organization committed to ensuring equitable access to economic opportunity, education, and justice for all young adults—no matter their background, income, or zip code. Year Up utilizes a high-expectations, high-support model where students learn in-demand technical and professional skills and apply them during a corporate internship. Year Up has served more than 34,000 young adults across 35 campuses since its founding in 2000 and has been voted one of the "Best Non-Profits to Work For" by The NonProfit Times.

About America Forward
America Forward is the Washington, D.C.-based nonpartisan policy initiative of New Profit, a pioneering national venture philanthropy organization that invests in a portfolio of breakthrough social entrepreneurs and systems-change initiatives, catalyzes and builds their impact, and transforms how government and philanthropy pursue social change to ensure that all people can thrive.

America Forward unites social innovators with policymakers to advance a public policy agenda that strengthens equity, fosters innovation, rewards results, catalyzes cross-sector partnerships, and transforms local impact into national change. The America Forward Coalition comprises a network of over 100 social innovation organizations that champion innovative, effective, and efficient solutions to our country's most pressing social problems while working in more than 15,000 communities nationwide. Since 2007, our America Forward Coalition organizations have successfully advocated for lasting policy change in education, workforce development, and evidence-based policy, leveraged $1.7 billion for social innovation, and driven millions of federal resources toward programs that are achieving measurable results for those who need them most.