

**COMMENTS TO PROPOSED REVISIONS OF 2010 STANDARD OCCUPATIONAL
CLASSIFICATION
SUBMITTED TO
THE OFFICE OF MANAGEMENT AND BUDGET
BY THE NATIONAL ORGANIZATION FOR COMPETENCY ASSURANCE
JULY 18, 2008**

The National Organization for Competency Assurance (NOCA) appreciates the opportunity to respond to the Office of Management and Budget’s (OMB) *Notice of Standard Occupational Classification Policy Committee; Recommendations to OMB and Solicitation of Comments*¹ (“2008 Notice”) regarding the Standard Occupational Classification (SOC) Revision for 2010.

On 29 September 2006, NOCA filed initial comments² to the *Notice of Solicitation of Comments*³ (“2006 Notice”), responding to the Standard Occupational Classification Policy Committee’s (SOCPC’s) proposal to remove “credentials” from the list of classification criteria for Principle 2.

The 2008 Notice suggests the adoption of the SOCPC’s recommendation to remove reference to credentials as one of several indices of the validity of classifying an occupation. The initial 10 Principles have been reformatted as 8 proposed SOC Classification Principles and 6 proposed SOC Coding Guidelines. These comments therefore will focus on the proposed SOC Coding Principle (Principle) 2 and the proposed SOC Coding Guideline (Guideline) 6.

For the reasons that follow, NOCA not only supports retaining “credentials” in the list of classification criteria for Principle 2, but also recommends the increased scrutiny of credentials in the classification of occupations. There are ample resources and uniformly agreed upon credentialing programs available to enable the use of a credential for a field or profession as an indicator for purposes of classification of an occupation. After a brief discussion of the role and field of credentials, these comments are organized to first respond to the brief explanation provided in the 2008 Notice for adoption of the SOCPC’s recommendation to remove “credentials” from Principle 2, and to second respond to each of the four reasons originally cited by the SOCRPC in the 2006 Notice for removing “credentials” from the criteria for Principle 2.

¹ Federal Register, Vol. 73, No. 100, 29930 et seq. (22 May 2008), hereafter cited in text and footnotes as “2008 Notice”.

² See letter from Cynthia C. Durley, as President of the National Organization of Competency Assurance, dated 29 September 2006, attached.

³ Federal Register, Vol. 71, No. 94, 28536 et seq. (16 May 2006), hereafter cited in text and footnotes as “2006 Notice”.

About the National Organization for Competency Assurance (NOCA) and the National Commission for Certifying Agencies (NCCA)

Established in 1977, NOCA⁴ is the leading international membership organization for the credentialing industry, representing more than 600 credentialing organizations around the world. Through an annual conference, regional and audio seminars, publications, and government affairs activities, NOCA serves the credentialing industry as a clearinghouse for information on the latest trends and issues of concern to practitioners and organizations focused on certification, licensure, and human resource development.

The National Commission for Certifying Agencies (NCCA) is the accreditation arm of NOCA. Credentialing programs may apply and be accredited by the NCCA if they demonstrate compliance with each of the *NCCA Standards for the Accreditation of Certification Programs*, which exceed the requirements set forth by the American Psychological Association, et al.⁵ and by the United States Equal Employment Opportunity Commission.

Driven in part by the proven reliability of high-profile, national credentialing programs (such as the Certified Financial Planner⁶ or Automotive Service Excellence⁷), and in part by the “nationwide trend whereby state regulatory agencies are getting out of the testing business, and instead recognizing professional certifications as meeting state regulatory requirements,”⁸ the credentialing industry has grown steadily over the past thirty years. In just six years, from 1999 to 2005, the estimated number of certified individuals increased from approximately 9 million to over 15 million.⁹ In the same six-year period, NOCA membership has increased almost 60% and the number of NCCA-accredited programs grew 150%.¹⁰

The sustained growth of credentialing has increasingly led state governments to reference and even require credentials for many occupations,¹¹ so it would be

⁴ On the internet at www.noca.org.

⁵ American Educational Research Association (AERA), American Psychological Association (APA), and National Council on Measurement in Education (NCME), *The Standards for Educational and Psychological Testing*, 1999.

⁶ The “Certified Financial Planner” or CFP® is offered by the Certified Financial Planner Board of Standards, Inc.

⁷ National Institute for Automotive Service Excellence (ASE) certifies a wide range of technical occupations, such as automotive mechanic.

⁸ Cynthia C. Durley, National Organization for Competency Assurance, *The NOCA Guide to Understanding Credentialing Concepts* 5 (William Kersten et al., eds., 2005), page 10.

⁹ Wade Delk, *Trends in Certification*, CM News, Aug. 2006, at 19.

¹⁰ *Id.*

¹¹ Several examples can be provided upon request.

inconsistent with state practice for the federal government to move away from using credentials as an occupational classification criterion.

Background Information About Credentialing

“Credentials” is a broad term that encompasses professional certification (of individuals by a nongovernmental organization), accreditation (of organizations, institutions, facilities, or programs, by a non-governmental organization), licensure (of individuals by a government agency), and registration (which itself has several meanings beyond the scope of our current comment). Essentially, a legitimate credential—that is, a credential which is legally defensible and psychometrically sound—is verification by an authoritative third party that the credential-holder has met predetermined, standardized, and uniformly applied criteria that measure appropriate job qualifications.

As noted in *The NOCA Guide to Understanding Credentialing Concepts*:

. . . when conducted according to legally defensible and psychometrically sound methods and standards, credentialing . . . assures that a highly qualified, objective, recognized third party (the credentialing body) has examined this person, program, product or service and found it to meet defined, published, psychometrically sound, and legally defensible standards.¹²

This third-party assurance that an occupationally relevant and credible standard has been met helps to ensure the health, welfare, and safety of the public—most directly, that of employers, consumers, government regulators, and business partners of the credential holder. Thus, reputable credentialing organizations serve the public interest by decreasing uncertainty in the labor market and in the marketplace.

Historically, as a new occupation comes into being and evolves, its body of knowledge develops and becomes accepted by the individuals performing that job, by employers, and by customers. The emergence of a defined body of knowledge and a specific vocabulary are important steps in the development and definition of an occupation. As a profession’s body of knowledge becomes commonly accepted, the profession typically becomes regulated, either by the profession itself or by a government agency. In order to regulate appropriately—that is, to regulate in a legally defensible way—skill sets must be defined, and knowledge and skill competencies must be assessed and validated. Credentialing (certification and licensing) programs perform those functions, helping an occupation mature and

¹² Cynthia C. Durley, National Organization for Competency Assurance, *The NOCA Guide to Understanding Credentialing Concepts* 5 (William Kersten *et al.*, eds., 2005).

become stable. This longstanding process, culminating with the development and acceptance of professional credentials, is especially imperative in occupations in which protection of the public is of primary importance.

Response to Rationales provided in the 2008 Notice to Remove “Credentials” from the SOC Classification Principles

“The removal of credentials as a basis of classification was motivated by the instability in classification resulting from the difficulty of obtaining accurate, recent information on current credential requirements and certification status of incumbents as well as the lack of uniformity across the various State and local jurisdictions on the credentials they require. This variation of requirements and credential information prevents consistent occupational classification across data related to various jurisdictions, establishments, and occupations.”¹³

The rationale provided above makes a number of assertions that NOCA responded to in the first impression in its response to the 2006 Notice and for which no evidence is cited in the 2008 Notice relative to the comments received or further considerations made by the SOCPC.

Considering the brief explanation provided, NOCA strongly disagrees with the assertion that “accurate, recent information” is difficult to obtain relative to credential requirements and status of incumbents.

Programs initiated by the U.S. military provide an excellent resource to inform the SOC. The U.S. Army and U.S. Navy have both made investments into systems known as “Credentialing Opportunities On-Line” or COOL.¹⁴ These tools were designed for military service personnel who reside in all of the different 50 states. The military provides a wide array of professional development opportunities to their personnel. The military branches wanted to enhance learning opportunities for their personnel by ensuring that they could seamlessly transfer occupational skill-sets earned during their military service into the civilian world. The COOL programs support service personnel in this goal. COOL allows personnel serving in the military to review their desired occupation and match the skills and credentials earned during their service into a marketable profession once reentering the civilian world.

¹³ See 2008 Notice at 73 F.R. 29931.

¹⁴ The U.S. Army COOL website may be viewed at: <https://www.cool.army.mil/>. The U.S. Navy’s COOL websites may be viewed at: <https://www.cool.navy.mil/>.

Recognition of the value and transferability of occupational certifications continues for service personnel upon leaving the military. The Montgomery G.I. program, the government's primary educational benefit for veterans, recognized that occupational credentials have the desired rigorous and current standards in place. The Montgomery G.I. bill was updated in 1999 to allow veterans to use their Montgomery G.I. education benefits towards obtaining an occupational certification or license.¹⁵

Congress recognized that standards for certifications needed to be in place so the Montgomery G.I. benefit may be effectively utilized only towards recognized, substantive credentials, rather than diploma mills. To this end, the Professional Certification and Licensure Advisory Committee (PLCAC) was enacted. Created under Sec. 122(c) of the Veterans Benefits and Health Care Improvement Act of 2000,¹⁶ PCLAC was authorized by Congress to advise the Secretary of Veterans Affairs on the requirements of organizations or entities offering licensing and certification tests to veterans who may pay for the cost of certification tests with their Montgomery G.I. benefits. Several representatives of NOCA served on the PCLAC¹⁷ and assisted with developing regulations for organizations who wanted their programs approved by the Department of Veterans Affairs for Montgomery G.I. reimbursement.¹⁸

Other government agencies recognize the value that an occupational certification or licensure holds. The U.S. Department of Labor created its Career One-Stop¹⁹ online resource for job seekers. This site informs job seekers about prospective occupations and the certifications and licenses recognized for each. This resource is also widely used by state workforce development agencies, who recognize the value of certifications and licenses when assisting persons with their job search and training needs.

In 2000, the U.S. Department of Transportation (DOT) began requiring substance abuse professionals working in DOT's Transportation Workplace Drug and Alcohol Testing Programs to have a credential from an NCCA-accredited organization.²⁰ In its' Final Rule, DOT stated that, "having NCCA accreditation is a means of demonstrating to the Department of Transportation that your certification has been reviewed by a panel of impartial experts that have determined that your examination(s) has met stringent and appropriate testing standards."

¹⁵ P.L. 106-50, Aug. 17, 1999, 113 Stat. 233.

¹⁶ Public Law 106-419; 38 U.S.C. 3689(e).

¹⁷The PCLAC terminated according statute on December 31, 2006.

¹⁸ A listing of approved programs is available here:

http://www.gibill.va.gov/GI_Bill_Info/Search_Programs.htm.

¹⁹ Career One-Stop is available here: <http://www.careeronestop.org/>.

²⁰ See 65 F.R. 79461 (Dec. 19, 2000).

NOCA further urges the SOCPC to become better informed in the use and application of the terms “credential requirements” and “certification status” as well as the meaning of “credential” and “certification” relative to State and local requirements.

Nationally recognized, voluntary credentials are often adopted in whole or in part by State licensure bodies as part of the requirement for practice. In some instances such a credential may be acknowledged in the field and among the licensing community so widely that State licensure requirements are very closely aligned. However, it is important to distinguish between these licensure requirements, often referred to with terms such as “certificates” or “credentials” and a voluntary credential utilized by a field or occupation for purposes of professional competency assurance and development.

California and New Jersey, for example, began requiring crane operators to receive certification by an NCCA-accredited organization before they may be employed in those states.²¹ The Occupational Health Standards Administration (OSHA) has plans to require NCCA-accredited certification for crane operators in the coming years.

Response to Reasons 1 & 2 of the 2006 Notice – The Growth of Credentialing does not Justify its Removal from SOC Principle 2

With regard to the first two reasons the Standard Occupational Classification Revision Policy Committee (SOCRPC) cites for proposing the removal of “credentials” from Principle 2, NOCA agrees that there are many different types of occupational credentials, and that these credentials do, indeed, “vary not only from State to State, but may also vary by locality, by industry size class, or by firm.”²² However, this does not diminish the necessity of providing meaningful credentialing information to users of the SOC. If anything, the large variety of credentials and the growing use of credentialing places a higher importance on maintaining the reference to “credentials” in the SOC. The optimal resolution of this issue may be to restrict the term “credentials” to those whose legitimacy²³ has been verified by a credible, national organization that accredits credentialing programs.²⁴

²¹ See “Crane Operators in California and New Jersey Require NCCA Accredited Certification” at <http://www.noca.org/portals/0/crane%20operators.pdf>.

²² See 2006 Notice at 28537.

²³ The purpose of this recommended discipline would be to ensure the psychometric soundness and legal defensibility of the credential relied upon as an element of Principle 2.

²⁴ Such as the National Commission for Certifying Agencies (NCCA), NOCA’s accreditation arm.

NOCA takes notice of the following statement in the 2006 Notice regarding the proposed revisions to the SOC Classification Principles:

As indicated in the 2000 SOC Manual, OMB established a Standard Occupational Classification Policy Committee (SOCPC) to maintain the current SOC to ensure that it remains applicable to the world of work. Users of occupational data include government program managers, industrial and labor relations practitioners, job seekers, employers wishing to set salary scales or locate an establishment, and educational institutions—including teachers, guidance counselors, and students exploring careers and identifying career education and training alternatives.²⁵

In light of the stated purpose of the SOC and the stated users and consumers of the occupational data reflected therein, it is NOCA's position that the proposed removal of "credentials" from Principle 2 would deny both public and private sector employers, members and potential members of an occupation, students, and academic institutions of significant information²⁶, thus interfering with informed decision making and rendering the labor market less efficient.

The issue is whether the classification of occupations should be informed by the existence of credentials in the same way that education, training, and skills are intended to inform. Education, training, and skills assure employers, consumers, regulatory agencies, business partners, and potential future members of a particular occupation that the worker is qualified to perform the core functions of that occupation. Credentials—those that meet objective, third-party tests of legal defensibility and psychometric soundness, such as those accredited by the NCCA—provide exactly the same type of assurance to the same people. Since many employers, consumers, regulatory agencies, and business partners consider credentials (as well as education, training, and skills) to be a requirement for many occupations, removing "credentials" from Principle 2 would be a disservice to users of occupational data.

NOCA agrees with the observation that the American labor market is experiencing increased "complexity, variability, and frequency of change in credential requirements."²⁷ However, NOCA asserts that the growing importance and rapid degree of change in occupational credentialing increases, rather than decreases, the need for including this information in Principle 2.

²⁵ See 2006 Notice.

²⁶ Namely, whether the members of a given occupation are required to adhere to established, occupationally relevant (*i.e.*, psychometrically sound and legally defensible) standards verified by a credentialing organization.

²⁷ See 2006 Notice at 28537.

The dilemma facing OMB with regard to occupational credentials is similar to the challenge confronting the United States Department of Education concerning the accreditation of academic institutions and programs: Just as the number of credentials has mushroomed over the past several years, there has been a proliferation of academic programs and accreditations. The Education Department has responded by increasing (not decreasing) public information about the quality of schools and other academic programs.

In keeping with this sound philosophy of enabling informed decision-making by providing relevant information, NOCA recommends that the SOC intentionally respond to the growth in the credentialing industry and the increasing complexity of occupational specialty by increasing the amount of credential-related information available to the users of occupational classification data, rather than omitting this vital factor from the classification criteria.

Response to Reason 3 of the 2006 Notice – NOCA Volunteers to Serve as a Resource for the SOCRPC

The third reason given to remove “credentials” from Principle 2 is that “there is no current data collection mechanism to obtain comprehensive information on occupational credentialing and keep it updated . . .”²⁸

NOCA asserts that the steady growth of credentialing across occupations means that it is important to collect data about credentials, rather than exclude credentials from the SOC Classification Principles. NOCA would gladly work in partnership with OMB and the SOCRPC and other relevant federal organizations to develop a data collection mechanism to identify and regularly update comprehensive information regarding credentials and credentialing organizations.²⁹ As the clearinghouse for information about the credentialing industry, NOCA is uniquely positioned to help meet the needs of the users of occupational data, and NOCA welcomes the opportunity to serve the public interest in this capacity.

NOCA notes that currently proposed SOC Classification Principle 8 argues in part for the use of nationally recognized credentialing bodies as one source of accessible data on an occupation.³⁰ As referenced previously, this information is currently being collected by the U.S. Army and Navy Credentialing Opportunities Online websites in addition to the U.S. Department of Labor’s Career One-Stop portal.

²⁸ See 2006 Notice at 28537.

²⁹ A listing of NCCA-accredited credentialing programs is already available; acquiring information about non-accredited programs would necessitate the creation of a new method of collecting the data.

³⁰ See 2008 Notice at 29932.

Response to Reason 4 of the 2006 Notice – The Pace of Change of NCCA-Accredited Credentials Tracks the Pace of Change of Occupations

The fourth reason cited as justifying the removal of “credentials” from Principle 2 is that, “as technology and other requirements change, credentials change over time more rapidly than other variables and these changes could not be reflected in a classification that is to remain stable over a 5 to 10 year period.”³¹ NOCA notes that credentials that are accredited by the National Commission of Certifying Agencies (NCCA) evolve in direct relationship with the relevant occupation. To quote the *NCCA Standards*:

Because rapid changes may occur in knowledge and/or skills and in technology, it is important that certification programs periodically review performance domains, tasks, and associated knowledge and/or skills in the specifications to ensure that they are current. Since it is impossible to specify with precision how often the review should be conducted, each certification agency should develop its own timeframe and rationale. For existing certification programs, any changes between new specifications and previous specifications should be noted and explained.³²

Restated, the content of credentials which are accredited by the NCCA should only change when the relevant occupation changes, and at the same pace. If, for a given occupation, credentials change more rapidly than education, training, and skills, one of two things is happening:

- 1) The credentialing organization is not adhering to the *NCCA Standards*³³; or
- 2) Changes in an occupation’s core tasks are being more closely tracked by credentials than by education, skills, and training. This would increase, rather than decrease, the relevance of credentials to an occupation’s classification.

NOCA shares the federal government’s opposition to the proliferation of unsound, indefensible credentialing programs, which are often referred to as “diploma mills.”³⁴

³¹ See 2006 Notice at 28537.

³² National Organization for Competency Assurance, *NCCA Standards for the Accreditation of Certification Programs*, Standard 10, Commentary Paragraph E (2004).

³³ By not adhering to the NCCA Standard, the credentialing organization is not operating a psychometrically sound and legally defensible credentialing program.

³⁴ See generally: U.S. Senate Committee on Homeland Security and Governmental Affairs, *Education Secretary Pledges to Work with Chairman Collins to Combat use of Diploma Mill Degrees*, http://www.senate.gov/~govtaff/index.cfm?FuseAction=PressReleases.Detail&Affiliation=C&PressRelease_id=549&Month=10&Year=2003, 13 October 2003; and Federal Trade Commission, *FTC Issues “Facts for*

Credentialing programs are an intermediary safeguard to the public, protecting consumers, employers, and business partners from insufficiently skilled practitioners who are the products of diploma mills and who might enter and be accepted into the workforce in the absence of credentialing programs verifying those individuals' knowledge and skills.

Legitimate credentials should only change rapidly for occupations that have requirements which are in constant flux. Thus, if a psychometrically sound and legally defensible credential is not “stable over a 5 to 10 year period,”³⁵ that is merely an indication that the occupation itself is evolving quickly. Needless to say, having a credential track the evolutionary pace of an occupation is not a good reason to remove the credential from the classification criteria. Actually, a legally defensible and psychometrically sound credential that changes at the same pace as the relevant occupation should be considered stable, because the credential is reflective of the evolving core requirements of the occupation. In addition, a reputable credential should require that the credentialed individual periodically recertify by demonstrating continued, occupationally relevant competence; recertification requirements thus enhance the stability of the credential.

OMB, as well as the SOCPC and other relevant federal organizations, in the fulfillment of their data collection duties are invited to work in partnership with NOCA to identify data about credentials and credentialing organizations.

Conclusion

For the reasons stated above, NOCA proposes that:

- 1) SOC Classification Principle 2 as proposed in the 2008 Notice should be modified to read –

“Occupations are classified based on work performed and, in some cases, on the skills, education, training, and/or legally defensible and psychometrically sound credentials such as those in compliance with the *National Commission for Certifying Agencies (NCCA) Standards for Accreditation for Certification Programs*, needed to perform the work at a competent level.”

Business” Guide on Avoiding Fake Degrees,
<http://www.ftc.gov/opa/2005/02/diplomamills.htm> , 1 February 2005.

³⁵ National Organization for Competency Assurance, *NCCA Standards for the Accreditation of Certification Programs*, Standard 10, Commentary Paragraph E (2004).

Or in the alternative, as proposed in the 2006 Notice –

“Occupations are classified based on work performed and on required skills, education, training, and legally defensible and psychometrically sound credentials such as those in compliance with the *National Commission for Certifying Agencies (NCCA) Standards for Accreditation for Certification Programs.*”

- 2) to remain consistent with the state trend of referencing and requiring credentials, the SOC should become more informed by the existence of nationally recognized credentialing programs
- 3) OMB, the SOCPC and other relevant federal organizations work in partnership with NOCA to further develop data collection to identify and regularly update comprehensive information regarding credentials and credentialing organizations

In recognition of the importance of the Standard Occupational Classification and its role in informing government agencies, public and private sector entities, and the general public, NOCA appreciates consideration of these comments.

Questions relative to these comments may be directed to NOCA at 202-367-1165 or jkendzel@smithbucklin.com.

Respectfully submitted

NATIONAL ORGANIZATION FOR COMPETENCY ASSURANCE

2025 M Street, N.W., Suite 800
Washington, DC 20036-3309
Ph 202.367.1165
Fax 202.367.2165
<http://www.noca.org>

By: James Kendzel, as its Executive Director

Attachments:

The NOCA Guide to Understanding Credentialing Concepts

NCCA Standards for the Accreditation of Certification Programs

Letter dated 29 September 2006 commenting on the 2006 Notice