June 23, 2011

OMB Desk Officer for the Department of Labor, Bureau of Labor Statistics
Office of Management and Budget, Room 10235
Washington, DC 20503

Via email: OIRA_submission@omb.eop.gov

Re: Comments on proposed Green Technologies and Practices Survey

I am pleased to respond to the notice in the May 24, 2011 Federal Register asking for comments regarding the Bureau of Labor Statistics (BLS) information collection request “Green Technologies and Practices Survey.”

As a research professor at the George Washington Institute of Public Policy, George Washington University, I focus on federal policies and programs that support job creation and economic competitiveness. From this perspective, I believe the BLS Green Technologies and Practices (GTP) Survey will be valuable in two ways. First, in quantifying the extent to which U.S. establishments are using green technologies and practices, the survey will provide insight about the extent to which the competitive position of individual U.S. industries is or might be enhanced through the use of such technologies and practices. Second, in quantifying the number of employees, by occupation, who spend more than half their time on green technologies and practices, the GTP survey will lead to more efficient labor markets by informing education institution decisions about program offerings and student and worker decisions about career paths. Consequently, I am pleased to support BLS’ request to collect information through the GTP survey.

That said, I ask OMB, as a condition of clearance, to direct BLS to examine the extent to which the aims of the GTP data collection might be supported through the use of “real-time labor market information (LMI)” on green jobs. Real-time LMI is derived from the analysis of Internet job boards to determine employment demand by occupation, industry, and geography and identify the task content and educational requirements of such jobs. The most well-known real-time LMI product published on a regular basis is the Conference Board’s Help Wanted On-Line (HWOL). The real-time LMI field is in its infancy, but shows promise to provide timely, useful, low-cost information on U.S labor markets.

In February 2010, the Department of Labor’s Employment and Training Administration (ETA) funded a $4 million effort by a Northeast Consortium (including eight Northeast state LMI agencies, the Conference Board, Georgetown University, and the Direct Employers Association/NASWA/National Labor Exchange (NLX) partnership [JobCentral]) to use real-time LMI techniques to conduct a research project on demand for green jobs, with four elements:
• develop current demand numbers by occupation and labor market for each of the SOC/O*NET occupations, listing current vacancies and those that have occurred over the last 3 months
• prepare short term job vacancy projections (6-12 months in the future) for the same occupations and in all labor markets where there is sufficient real time demand flow to allow for the projection
• develop lists of “green” skills, detailed work activities, knowledge elements, specific technologies, and education requirements including degrees, certificates, and industry certifications through direct analysis of the text
• look at the distribution of the “green” job vacancies between “green” and “non-green” industries

The consortium’s “Making Green Real” proposal to ETA and PowerPoint presentations of interim findings are attached. The project will run through December 2011.

In its GTP survey proposal to OMB, BLS indicates “This special survey will be conducted in 2011 and 2012. BLS intends to assess the practicality and usability of collecting occupational employment and wages related to green technologies and practices.” Given the implementation of the ETA-funded Northeast Consortium project, I ask that OMB approve the GTP survey with a condition of clearance that BLS review the consortium’s methods and findings and include as part of its GTP survey assessment an examination of the potential use of real-time LMI techniques to support GTP survey aims. In other words, I ask that OMB direct BLS to look into the “practicality and usability of collection occupational employment and wages related to green technologies and practices” through both an establishment survey and web job board scraping. I further recommend that the BLS assessment be provided to OMB as a written report.

The reasons for my request are several. As the Department of Labor is funding two separate and quite different efforts to collect information on green jobs, it would be valuable to assess the strengths and weaknesses of each approach and the potential for synergy and complementarity. (I am not suggesting that the GTP survey is duplicative of the ETA-funded effort—the latter is quite experimental and with numerous problems, as the attached presentations show, and not intended for use as official federal statistics.) As George Werking, former BLS assistant commissioner, advises the Conference Board on its HWOL series, relationships are in place to facilitate a broader assessment.

Real-time LMI offers the potential for in-the-moment, low-cost, high coverage administrative data collection that could be used to enhance, extend, or possibly replace more expensive, less quick survey-based methods; this potential is attractive in a time of tight federal budgets. At the same time, as the attached presentations make clear, a number of issues need to be addressed before real-time LMI can produce reliable statistics. Thus, it would be particularly valuable for BLS to provide its knowledgeable perspective on issues and opportunities for the use of real-time LMI.

The lead agencies in the Northeast Consortium are eight state members of the BLS-state cooperative statistics system and a partner is the National Association of State Workforce Agencies. I understand that over 25 state workforce agencies are currently experimenting with
the use of real-time LMI techniques, not limited to green jobs. Further, the ETA-funded state occupational projections consortium is beginning to use real-time LMI to inform its products. Consequently, an assessment could more broadly inform the appropriate place of real-time LMI in federal-state cooperative efforts.

Thank you for your consideration of my support and condition of clearance recommendation for the valuable GTP survey. I look forward to your decision.

Sincerely,

Andrew Reamer
Research Professor