



August 6, 2026

Steven Rietzke
Office of Workforce Investment
U.S. Department of Labor
200 Constitution Avenue NW, Suite C-4510
Washington, DC 20210

RE: Modernizing Federal Workforce Information Tools: Request for Information on Online Career Tools and the Occupational Information Network (O*NET) Program

Dear Division Chief Rietzke:

The National Career Development Association (NCDA) appreciates the opportunity to provide comments in response to the U.S. Department of Labor Employment and Training Administration (ETA) Request for Information on Modernizing Federal Workforce Information Tools and the Occupational Information Network (O*NET) Program. NCDA, founded in 1913, serves as the primary career development association in the United States. Our mission includes advancing career development through standards, credentials, publications, and advocacy, supporting practitioners who help individuals achieve meaningful career and life goals. Our organization includes more than 7,000 credentialed career development professionals across the country. Our members serve in K-12 schools, community colleges, four-year institutions, American Job Centers, nonprofit workforce organizations, government, private practice, corrections, rehabilitation, and employer settings.

NCDA Position

NCDA submits this comment because O*NET and CareerOneStop are not abstract data systems for our profession. They are daily-use public infrastructure. Career development professionals use occupational information to help individuals understand the relationship between interests, values, skills, work contexts, training options, credentials, wages, local

opportunity, disability access, family obligations, and long-term career mobility. We therefore urge ETA to explicitly recognize **career development practitioners** as a distinct stakeholder group in the modernization process.

Policy outcome

NCDA supports modernization of O*NET and CareerOneStop but recommends modernization that strengthens rather than replaces the public occupational information infrastructure. **Specifically, NCDA asks** ETA to preserve O*NET as a free, transparent, evidence-based, nationally comparable system while improving timeliness, skills granularity, credential connections, data interoperability, accessibility, and responsiveness to AI-driven changes in work.

Why O*NET matters

O*NET remains essential because it provides a public, standardized, and research-informed vocabulary for the world of work. DOL describes O*NET as a regularly updated database of occupational characteristics and worker requirements across the U.S. economy, including knowledge, skills, abilities, tasks, work activities, and other descriptors. O*NET also powers public-facing tools such as O*NET Online, My Next Move, My Next Move for Veterans, Mi Proximo Paso, and career exploration assessments. These tools are especially important for users who do not have access to proprietary career platforms or institutionally licensed labor market intelligence systems.

Need to modernize now

At the same time, NCDA agrees with ETA that the labor market is changing faster than public data systems have historically been structured to respond. AI and automation are changing task composition. Hybrid occupations and interdisciplinary jobs are becoming more common. Workers need clearer pathways to compare short-term credentials, apprenticeships, degree programs, and local employment opportunities. For O*NET to remain useful, it must become more timely, granular, interoperable, and user-centered.

Recommendation 1: Formally include career development practitioners in modernization governance

ETA should establish a Career Development Practitioner Advisory Council or equivalent formal mechanism to advise on O*NET and CareerOneStop modernization. This body should include career counselors, career coaches, workforce navigators, higher education career advisors, K-12 counselors, rehabilitation counselors, veteran-serving practitioners, and American Job Center frontline staff. This recommendation responds to RFI questions

on current use, pain points, workforce practitioners, accessibility, AI-powered functionality, transferable skills navigation, and measures of success.

Recommendation 2: Adopt a transparent evidence framework for modernized occupational and skills data

NCDA supports using job postings, AI-assisted classification, state labor market data, credential data, and employer input as supplemental signals, but those signals should not be presented as equivalent to validated O*NET survey and expert data unless they meet clear methodological standards. Each data element should identify source, date, geography, method, confidence level, and limitations. This will allow ETA to modernize quickly while preserving public trust.

Recommendation 3: Build responsible AI safeguards into the modernized career site and O*NET tools.

AI-powered features may help users identify occupations, adjacent roles, transferable skills, training options, and local services. However, AI tools must not become opaque gatekeepers that sort individuals into narrow pathways based on incomplete prior experience, ZIP code, demographic proxies, or biased labor market data. Any AI-assisted recommendation should include plain-language explanation, user control, opt-out options, privacy protections, and referral to human support.

Recommendation 4: Make accessibility, language access, rural access, and disability inclusion measurable modernization requirements.

A modernized site should be mobile-first, low-bandwidth, screen-reader compatible, plain-language, multilingual, and usable by individuals with disabilities. It should support users who access the system through phones, public libraries, schools, American Job Centers, correctional reentry programs, tribal communities, and rural broadband-limited contexts.

Recommendation 5: Improve skills, task, technology, credential, and work-arrangement granularity.

NCDA supports expanding O*NET data so users can understand not only occupations but also job-level variation, emerging tools and technologies, AI-related tasks, digital credentials, remote work compatibility, green economy tasks, and hybrid skill bundles. This should be implemented in layers so users can choose a simple career exploration view or a deeper data view.

Recommendation 6: Improve interoperability with education, workforce, and credential systems.

ETA should expand machine-readable data, stable identifiers, APIs, JSON-LD/RDF, crosswalks, and documentation so that states, institutions, developers, researchers, and workforce partners can integrate O*NET with training catalogs, registered apprenticeships, eligible training provider lists, credential registries, CIP, SOC, wage records, and state LMI systems.

Recommendation 7: Create local and regional adaptability without weakening national comparability.

National O*NET profiles should remain the stable baseline, but users should be able to see regional wages, demand, employers, training options, and state-specific credential requirements. State and local overlays would allow workforce boards and practitioners to explain where national occupational profiles diverge from regional labor market realities.

Recommendation 8: Invest in long-term research on career development in an AI-shaped labor market.

ETA, in collaboration with BLS, NSF, the Department of Education, researchers, and practitioner organizations, should fund research on occupational convergence, AI task change, hybrid jobs, skills-based hiring outcomes, credential quality, and the regional representation effects of algorithmic career guidance.

Opportunity gaps

NCDA urges ETA to treat opportunity gaps as a core design issue. Occupational information systems influence who sees which futures as possible. When data are incomplete, inaccessible, biased, or too difficult to interpret, the harm falls most heavily on people with fewer institutional resources. A modernized O*NET and CareerOneStop system should help first-generation students, low-income workers, veterans, people with disabilities, opportunity youth, new citizens, rural residents, adult learners, justice-impacted individuals, and underrepresented groups see pathways to economic mobility, not simply reproduce historical patterns of occupational sorting.

Closing NCDA Request

In summary, NCDA respectfully requests that ETA: **(1)** preserve *ONET as a free, trusted, and* transparent public occupational information system; **(2)** formally include career development practitioners in O*NET and CareerOneStop modernization governance, user testing, and implementation feedback; **(3)** adopt transparent methods for integrating real-time labor market signals, job posting data, credential information, state/local data, and AI-derived insights; **(4)** require responsible AI safeguards, including explainability, user control, privacy protections, and human-centered guidance; **(5)** prioritize accessibility,

rural access, disability inclusion; **(6)** improve the granularity of skills, tasks, tools, technologies, credentials, and work-arrangement data; **(7)** strengthen interoperability and local/regional adaptability without weakening national comparability; and **(8)** invest in long-term research on emerging work, AI-driven occupational change, hybrid jobs, skills-based hiring, and career development practice. NCDA welcomes continued consultation and would be pleased to support user testing, practitioner feedback, advisory participation, and implementation planning.

Thank you for your time and thoughtful consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "David A. Adkins". The signature is fluid and cursive, with the first name "David" being more prominent.

NCDA President
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