

To Whom It May Concern:

This letter is in response to “Proposed changes to occupation, industry, and area detail in the OES survey,” posted on the Bureau of Labor Statistics (Bureau) website (<http://www.bls.gov/oes/detail.htm>) on May 19, 2016. The undersigned organizations representing a broad array of higher education institutions and campus leaders request that the Bureau reconsider this proposal and refrain from making the proposed occupation aggregation in the area of “Postsecondary teachers, except Graduate teaching assistants and Vocational education teachers, postsecondary.” This change is potentially severely detrimental to institutions of higher education because, by aggregating widely dissimilar postsecondary teacher positions together, the data becomes unusable for making prevailing wage determinations based on average wages paid to similarly employed workers. If the Bureau decides to proceed with consideration of the proposal, we request broader notice to stakeholders and the public and additional time to analyze the changes and provide input.

Our nation’s higher education system thrives much in part due to our ability to attract top international talent to educate and research at our institutions, providing students with the opportunity to learn from talented and diverse educators. The undersigned are committed to ensuring those faculty and staff are paid fair wages in compliance with all U.S. laws and regulations. As we read the proposal, we are greatly concerned it could undermine fair wages by creating prevailing wage determinations that are excessively high for some positions and excessively low for others. This would substantially harm the ability of institutions of higher education to secure international faculty who greatly contribute to higher education.

**Aggregated data is inadequate to meet the need.**

Replacing the current detailed data with the proposed aggregated data undermines the Bureau’s stated goal of “ensuring the program continues to provide the high quality employment and wage data customers need.” For the wage data to be useful for higher education institutions, it must reflect the diversity of disciplines, education, knowledge, tasks, and technology usage required of postsecondary teachers. Although the proposal is unclear, it appears to collapse the 37 subcategories that currently comprise the category “Postsecondary teachers, except Graduate teaching assistants and Vocational education teachers, postsecondary” into a single “postsecondary teachers” overly expansive category. This aggregation will render the data inadequate for determining prevailing wages thus making it unworkable for the needs of the Bureau’s “customers.” The proposal would seemingly consolidate into one classification teaching positions that typically have very different salary levels. For example, in the geographic area near Michigan State University, a Level 2 wage for Education Teachers, Postsecondary is \$46,760 as compared to a Level 2 wage of \$100,107 for Engineering Teachers, Postsecondary. The result of merging these and other categories would be prevailing wage determinations that are excessively high for some positions and excessively low for other positions. Some colleges and universities have noted they see a need for more classifications not fewer.

**Broader notice and additional time is needed to respond to the proposal.**

The proposed changes to the OES survey were announced on the Bureau’s website in a summary manner, providing stakeholders and the public only about three weeks to analyze

the proposal and submit responses. This is not sufficient notice or timeframe to respond to such a significant change. If the Bureau determines to move forward with this proposal, we request it provide wider notice to stakeholders and the public, and a more reasonable time period to analyze it and to respond appropriately.

If you have any questions, please contact Heather Stewart of NAFSA: Association of International Educators at [heathers@nafsa.org](mailto:heathers@nafsa.org) and Craig Lindwarm of the Association of Public and Land-grant Universities at [clindwarm@aplu.org](mailto:clindwarm@aplu.org).

Thank you for your consideration.

Sincerely,

American Association of State Colleges and Universities

Association of American Universities

Association of Community College Trustees

Association of Public and Land-grant Universities

Council for Christian Colleges & Universities

CUPA-HR: College and University Professional Associations for Human Resources

NAFSA: Association of International Educators