

The Bipartisan Policy Center's Suggestions for Modernizing Schedule A

Brent Parton, Principal Deputy Assistant Secretary for Employment and Training
Employment and Training Administration
U.S. Department of Labor
200 Constitution Avenue NW
Washington, DC 20210

Re: **Labor Certification for Permanent Employment of Foreign Workers in the United States;
Modernizing Schedule A To Include Consideration of Additional Occupations in Science,
Technology, Engineering, and Mathematics (STEM) and Non-STEM Occupations**
DOL Docket No. ETA-2023-0006
RIN 1205-AC16
Submitted via Regulations.gov

Dear Principal Deputy Assistant Secretary Parton:

This letter concerns the Department of Labor's (DOL) Employment and Training Administration's request for information on the Schedule A shortage occupation list. The Bipartisan Policy Center appreciates the opportunity to provide feedback on modernizing Schedule A—a vital tool for addressing U.S. labor supply needs through immigration.

BPC is a DC-based think tank that helps policymakers work across party lines to craft bipartisan solutions. BPC polling shows that expanding legal immigration to support the economy and fill jobs has broad support among both Democrats and Republicans.¹ This bipartisan agreement suggests that any modernization of Schedule A by DOL could remain durable across administrations. With Congress not having raised visa caps since 1990, updating Schedule A is an effective way to direct our existing visa allocation where it is most needed.

BPC works across multiple policy areas, giving us a clear view of how a lack of available U.S. workers for STEM and non-STEM jobs negatively impacts economic growth, national security, international competitiveness, and the well-being of Americans. Addressing these labor needs is a clear imperative for the current administration and modernizing Schedule A is an effective way to start doing so.

We hope that DOL carefully considers the answers we have provided below to the questions posed in the RFI. Now is the time to adopt an effective, repeatable approach to regularly updating Schedule A.



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We appreciate the opportunity to participate in the rulemaking process. For any questions or additional information, please contact Theresa Cardinal Brown, BPC Senior Advisor for Immigration and Cross-Border Policy (TBrown@bipartisanpolicy.org).

Respectfully submitted,

The Bipartisan Policy Center

Answers to RFI Questions

- 1. Besides the OEWS, ACS, and CPS, what other appropriate sources of data are available that can be used to determine or forecast potential labor shortages for STEM occupations by occupation and geographic area?**

The Occupational Employment and Wage Statistics (OEWS) program, American Community Survey (ACS), and Current Population Survey (CPS) provide useful data on current occupational employment, but additional data sources could provide useful additional information on emerging labor market needs.

Ideally, a dataset focusing on labor market dynamics, such as the Job Openings Labor Turnover Survey (JOLTS), would be used to understand monthly changes in labor demand and labor supply. JOLTS provides data on job openings, hires, and separations, which together can indicate emerging labor needs. Unfortunately, JOLTS data is not available for specific occupations. BPC suggests that, subject to resource availability, the Bureau of Labor Statistics (BLS) expands JOLTS to collect monthly data at the occupational level.

While recent changes in labor market conditions can give some indication of emerging shortage areas, BPC advises that any methodology for updating Schedule A on a regular basis (see below) also considers forward-looking data, such as estimates of future job creation. One such example is the 10-year occupational employment projections by BLS, as published in the Occupational Outlook Handbook (OOH).^{2,3} Surveys of employers that ask about future expansion plans or areas for investment, such as the World Economic Forum's Future of Jobs Report, can also help to understand future job trends.⁴

Another valuable data source is the Business Trends and Outlook Survey (BTOS), conducted by the Census Bureau.⁵ BTOS surveys over one million businesses about their six-month expectations for conditions including revenue, employment, hours worked, location operating status, demand, and prices. Analysis of this dataset could highlight which industries may expect increased labor needs. While BTOS does not currently collect occupational data, BPC suggests that, subject to resource availability, BLS works with the Census Bureau to add occupational questions to the survey, even if it is a single open-text question about changing occupational needs. Leveraging such a large, existing survey could provide valuable insights into businesses' future labor needs and potential shortages in specific occupations, including STEM fields. By incorporating forward-looking information, DOL can address shortages before they become acute, minimizing negative economic and social impacts.

2. How could the Department establish a reliable, objective, and transparent methodology for identifying STEM occupations with significant shortages of workers that should be added to Schedule A?

BPC recommends that DOL adopts a repeatable mixed methods approach to update Schedule A for both STEM and non-STEM labor needs. This would include a mechanical, data-driven process to determining labor needs, complemented by more qualitative analysis. BPC recommends creating an independent body tasked with making recommendations to DOL on how to update Schedule A, and that the list is updated every two years to account for changing labor market conditions.

A Mechanical, Data-driven Process

A mechanical, data-driven process to updating Schedule A could, similar to the approach of the UK's Immigration Salary List, consider a variety of labor market metrics to develop an index of the shortage severity of a particular occupation.^{6,7} The Institute for Progress' (IFP) recent research paper presents a rigorous proof of concept of this approach using U.S. data.⁸ Along with highlighting current shortage areas, IFP's methodology indicates emerging shortage areas through the inclusion of indicators that look at recent changes in labor market conditions, such as percentage change in the median wage for an occupation over one year. As outlined earlier in our submission, BPC would suggest any methodology for updating Schedule A also considers forward-looking data, such as estimates of future job creation. BPC endorses a similar approach to IFP's research paper as central to updating Schedule A on a regular basis. Such a mechanical, data-driven process benefits from being reliable, repeatable, objective, transparent, and low-cost.

Qualitative Analysis to Complement a Data-driven Process

A drawback of IFP's approach and other mechanical methods of determining labor shortages is that they may inadvertently fail to include certain occupations on Schedule A that are in shortage but do not appear to be so from the chosen data inputs. For example, occupations like teachers and direct-care health workers, do not operate under typical private market conditions, and so data such as average wage increases do not fully reflect hiring challenges. In the case of direct care workers, Medicaid serves as the primary payer for long-term services and supports; therefore, the wages of direct care workers typically do not respond quickly to market dynamics.⁹ (See our response to the next question for more detail on how compensation is determined for the direct care workforce). Similarly, pay for public-sector teachers is set via governmental action at the local level and based on tax revenues available, and so may not be adjusted as they would in a pure market-labor situation. For these reasons, BPC does not advise that DOL rely solely on a quantitative, mechanical approach to gauging shortages. It will be necessary to incorporate qualitative analysis, such as considering feedback from industry trade groups that can speak to their members' labor market needs.

A mechanical approach may omit occupations in Schedule A which would be in the national interest, meaning they are considered critical to the United States' infrastructure, security, or well-being. In immigration law, persons applying for permanent residence in the Employment-Based Second Preference category (EB-2; persons with advanced degrees or of exceptional ability) who are working in jobs or occupational areas that are deemed to be in the national interest may avoid the need for a job offer (and therefore a labor certification determination) altogether.¹⁰ While this waiver may be available to select persons meeting the EB-2 standards, Schedule A inclusion may be necessary to ensure a sufficient

workforce to meet those interests in key occupations not requiring such education or ability but integral to national security interests. Immigration law does not limit Schedule A to occupations that are ‘in shortage’ according to an economic methodology: indeed, immigrants of exceptional ability are currently included. Schedule A should also be updated regularly to include occupations that are in the United States’ critical national interest, making use of determinations made by relevant government departments.

For example, the Department of Homeland Security’s Cybersecurity and Infrastructure Agency (CISA) has a list of 16 “critical infrastructure sectors” that are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on the country.¹¹ Including key occupations in Schedule A that are critical to those infrastructure sectors would clearly be in the national interest. The International Trade Association has created a draft list of “critical supply chains,” that includes products deemed critical to the national interest.¹² More recently, the National Science and Technology Council has created the “Critical and Emerging Technologies List.”¹³ While none of these directly address jobs or occupations, it is likely that STEM-related occupations in most of these areas would be deemed in the national interest and, therefore, worthy of consideration for Schedule A, since the advancement of these technologies would benefit from more people overall working on them in the United States.

Finally, a purely mechanical approach that is limited to adding and removing occupations from Schedule A may fail to enable many individuals to enter the United States to fill pressing skills shortages. The modern workforce is characterized by its complexity and dynamism, with roles and responsibilities that often transcend traditional job titles and occupational descriptions. As industries evolve and new technologies emerge, the skills and expertise required can change rapidly, making it difficult to capture the full spectrum of valuable talent through rigid occupational classifications. As noted in a recent research report by FWD.us, this is particularly the case in critical and emerging industries like semiconductors, AI, and quantum computing where occupational titles can fail to change in accordance with emerging needs.¹⁴ For example, the application of machine learning (ML) in semiconductor manufacturing is significantly advancing manufacturing processes and chip design, leading to efficiencies and innovations that could outpace traditional job classifications and required skill sets.¹⁵ For this reason, DOL should consider going beyond occupations and adding important STEM credentials and qualifications to Schedule A.

A Repeatable Process Conducted by an Independent Commission

Going beyond a solely mechanical approach to updating Schedule A would increase the time and resources required to update it regularly. For this reason, BPC recommends that such analysis is outsourced to a new ‘Independent Permanent Commission on the Labor Market’ that can carefully consider various types of evidence, making regular recommendations to DOL on how Schedule A should be updated.¹⁶ This mirrors the approach of the United Kingdom, where the Migration Advisory Committee (MAC) offers independent advice to the government on the Immigration Salary List (formerly the Shortage Occupation List). Such a commission would be a neutral arbiter of data, staffed by career experts rather than political appointees. Career experts would be drawn from multiple sectors and would likely apply for appointment to the commission. The commission could conduct analysis and consultations with varied stakeholders to understand emerging skills gaps in addition to examining labor data and trends to ensure that Schedule A is not only responsive to changing labor market needs but also forward-looking.

The Importance of Regular Updates to Schedule A

BPC recommends that the commission updates Schedule A once every two years to account for changing labor market conditions. It should be noted that demographic projections of the United States population

overall show significant trends that will affect the future availability of workers.¹⁷ Our aging population and declining birth rate will create a demographic drag on our economy and significantly affect employers' ability to fill many jobs in the future. A smaller proportion of younger workers will create shortages, especially in jobs that require significant manual labor that older workers are less able to perform. The increased share of the older population will create large job demand in occupations that many younger workers may not be trained for and which technology is unlikely to replace, such as geriatric nurses, personal care aides, and home health aides. While innovation and technology may help the U.S. economy adapt in some circumstances, in others labor shortages will likely persist. Therefore, it will be critical to adopt shortage determinations that can reflect trends in the labor market.

The prospect of continued advances in AI and associated automation of tasks provides a high degree of uncertainty over future workforce needs, further underscoring the need for regular updates to Schedule A. Automation can, in some cases, reduce labor needs by carrying out tasks without the need for human input. For example, in 1930 over 67,000 Americans were elevator operators, but this job has since primarily been automated and has even been removed as a job classification.¹⁸ Conversely, automation can also create jobs by powering entirely new industries. The rise of digital technology has already created jobs like mobile app developers, social media managers, and data scientists. The World Economic Forum expects automation to drive decreased demand for some occupations and increased demand for others, with STEM occupations driving much of the increase.¹⁹

There are also cases where automation of a particular role can, counterintuitively, increase employment in that role. When ATMs were first introduced in the 1970s, there were concerns that they would replace human bank tellers, leading to widespread job loss. Instead, the opposite was observed as the number of full-time equivalent bank tellers has grown since ATMs were widely deployed during the late 1990s and early 2000s.²⁰ Central to this was a reduction in operating costs as ATMs allowed banks to operate branches at a lower cost because they required fewer tellers to handle routine transactions. This led to banks opening more branches, which in turn created more job opportunities for tellers.

Even in industries and occupations where automation has a high potential to result in labor displacement, union action can affect labor market outcomes. In 2023, the Screen Actors Guild-American Federation of Television and Radio Artists (SAG-AFTRA) reached an agreement with the Alliance of Motion Picture and Television Producers (AMPTP) including various provisions to address the union's concerns about AI and protect actors' jobs.²¹ Recently, we have seen a formal partnership emerge between Microsoft and the AFL-CIO to ensure that worker perspectives and expertise are incorporated into the development of AI technology.²²

Overall, there is considerable uncertainty over what the labor market impacts of continued automation will be. For this reason, regular assessments of labor market needs, along with corresponding updates to Schedule A, are required.



3. Beyond the parameters discussed for STW occupations, should the Department expand Schedule A to include other non-STEM occupations? If so, what should the Department consider to establish a reliable, objective, and transparent methodology for identifying non-STEM occupations with a significant shortage of workers that should be added to or removed from Schedule A?

While the RFI emphasizes STEM occupations and any Schedule A list would be right to prominently feature them, DOL should not have preconceived opinions on which occupations should be added to Schedule A. Both STEM and non-STEM occupations should be considered for inclusion through the same mixed methods approach outlined above, as labor supply needs of both types can have severe negative effects on the United States' economic growth and international competitiveness. Additionally, labor supply needs can occur at any skill level as both the skills needed and the availability and willingness of U.S. workers to engage in that occupation can change over time, with or without the influence of foreign workers in the labor market.

BPC, not having conducted the rigorous mixed methods methodology outlined above, is not in a position to specify all STEM and non-STEM occupations that should be added to Schedule A. However, BPC's existing research has identified direct care occupations as facing long-standing worker shortages for over two decades.²³ Due to the existing evidence and the urgent need to address the shortages, particularly as the Baby Boomer generation ages out of the workforce, BPC recommends DOL expands Schedule A to include non-STEM occupations to address this shortage of direct care workers. After this initial designation, BPC recommends that the department continues to evaluate the necessity of the Schedule A designation for direct care occupations. This evaluation should use the same mixed methods approach outlined above, which acknowledges the atypical private market conditions of direct care occupations.

Direct care workers provide hands-on assistance with daily tasks or long-term services and support to older adults and people with disabilities. These workers include personal care aides (SOC 31-1122), certified nursing assistants (SOC 31-1131), home health aides (SOC 31-1121), direct support professionals, psychiatric aides (SOC 31-1133), and other occupations. Direct care workers provide a wide variety of essential long-term services and supports to patients, from helping with daily tasks such as dressing and bathing to some clinical services, including wound care and blood pressure readings.

Although the number of direct care workers more than doubled from 2.2 million in 2000 to 5.1 million in 2022, the supply of these workers will fall short of demand.²⁴ The BLS projects that, by 2032, only six million individuals will be working in home health aide, personal care aide, nursing assistant, and psychiatric aide jobs nationwide.²⁵ Though data limitations hamper efforts to estimate the full extent of the workforce gap, experts in the field project devastating shortages.²⁶ For example, one researcher—making broad assumptions about the labor market and utilization patterns—estimated that there will be a national shortage of 151,000 paid direct care workers in 2030 and 355,000 in 2040.²⁷ These estimates are likely conservative, considering data forecasts a decrease in the availability of unpaid family caregivers, attributable to smaller families and increased geographic dispersion. This would further exacerbate the

shortage in the paid direct care workforce which is already straining the healthcare system and harming care access, quality, and costs.^{28,29}

In *Addressing the Direct Care Workforce Shortage: A Bipartisan Call to Action* (December 2023), BPC described and provided bipartisan policy reforms to address the shortage of direct care workers, including a recommendation for policymakers to designate direct care occupations as Schedule A shortage occupations.³⁰ In the report, BPC identified various data sources that illustrate the shortage of direct care workers, such as federal employment and wage data categorized by Standard Occupational Classification (SOC) codes, along with federal predictions on the number of individuals in need of long-term services and supports.^{31,32} However, the report underscores challenges associated with these data sources, notably the lack of disaggregation by direct care worker occupation.

Researchers predict that the demand for direct care workers will increase with the rapid growth of the older adult population. Projections suggest that the population of adults aged 65 and older will nearly double from 49.2 million to 94.7 million between 2016 and 2060, with approximately one in five older adults requiring long-term services and supports for five years or more.^{33,34} This highlights the need for DOL to conduct a regular review and update of Schedule A.

Notably, as highlighted earlier in this submission, direct care workers do not operate under typical private market conditions, meaning these occupations do not respond quickly to market dynamics often used to gauge workforce shortages. Medicaid serves as the primary payer for long-term services and supports and therefore impacts compensation for direct care workers providing these services.³⁵ In addition, employers face significant challenges in retaining and recruiting direct care workers due, in part, to limitations in federal funding and state Medicaid reimbursements. These limitations restrict employers' ability to offer competitive compensation, especially when compared to other occupations operating under more typical private market conditions with similar entry requirements, such as fast-food and retail positions. These factors caution that there is a risk that a solely mechanical data-driven approach to updating Schedule A may exclude much-needed direct care workers.

As stated above, BPC believes that DOL should be open to including occupations of any skill level or type with sufficient evidence to demonstrate a shortage, and should develop methodologies to determine this. However, we also believe there exists sufficient current evidence to include direct-care occupations as Schedule A shortage occupations immediately and have recommended so in our reports.

Conclusion

BPC believes that Schedule A is an important tool to address critical labor shortages. To effectively update Schedule A, DOL should adopt a repeatable mixed-methods approach that incorporates both quantitative data analysis and qualitative information gathering.

BPC recommends establishing an independent commission to conduct this analysis and provide recommendations to DOL on updating Schedule A every two years. This will ensure the list remains responsive to evolving labor market conditions and economic needs. The commission should examine both STEM and non-STEM occupations impartially, making determinations based on the evidence of current and likely future labor shortages.

While many occupations may warrant inclusion on Schedule A based on the proposed methodology, BPC's research has found compelling existing evidence that direct care occupations face significant long-term labor shortages that negatively impact the well-being of Americans. BPC recommends adding key direct care occupations to Schedule A to begin addressing this pressing issue.

Demographic trends point to worsening labor shortages in the years ahead as the U.S. population ages. These shortages will further strain an already precarious fiscal situation.³⁶ Modernizing Schedule A and keeping it updated through a transparent process will be essential to fill critical labor gaps and promote continued American prosperity and security. BPC applauds the Department of Labor for initiating this important process through the RFI.

¹ Theresa Cardinal Brown, Sadikshya Nepal, Rachel Iacono. "BPC/Morning Consult Poll Finds Economic, Legal Immigration a Pathway for Bipartisan Legislation." Bipartisan Policy Center. May 27, 2021. Available at: <https://bipartisanpolicy.org/blog/bipartisan-immigration-reform/>.

² "Occupational Outlook Handbook: U.S. Bureau of Labor Statistics." U.S. Bureau of Labor Statistics. Office of Occupational Statistics and Employment Projections. September 6, 2023. Available at: <https://www.bls.gov/ooh/>.

³ Because 10-year projections are updated infrequently, it is necessary to compare past forecasts to actual job creation over previous periods to assess how accurate these projections have been. If using the 10-year projections, it is worth noting that OOH occupations are not equivalent to the Standard Occupational Classification (SOC), necessitating use of a "crosswalk" to map between the two. Available at: <https://www.bls.gov/emp/documentation/crosswalks.htm>.

⁴ "The Future of Jobs Report 2023." World Economic Forum. April 30, 2023. Available at: <https://www.weforum.org/publications/the-future-of-jobs-report-2023/>.

⁵ "Business Trends and Outlook Survey (BTOS)." United States Census Bureau. Available at: <https://www.census.gov/programs-surveys/btos.html>

⁶ The Immigration Salary List (ISL) replaced the Shortage Occupation List on 4th April 2024.

⁷ "Skilled Worker visa: immigration salary list." GOV.UK. April 4, 2024. Available at: <https://www.gov.uk/government/publications/skilled-worker-visa-immigration-salary-list>.

⁸ Lindsay Milliken, Jeremy Neufeld, and Greg Wright. "Help Wanted: Modernizing the Schedule a Shortage Occupation List." Institute for Progress. December 14, 2023. Available at: <https://ifp.org/schedule-a/>.

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