



October 27, 2025

Honorable Linda McMahon,
Secretary of Education
U.S. Department of Education,
400 Maryland Ave. SW
LBJ, Room 5C133
Washington, DC 20202-1200

Re: September 25, 2025 Proposed Priority and Definitions-Secretary's Supplemental Priority and Definitions on Career Pathways and Workforce Readiness

Dear Secretary McMahon,

On behalf of the American Association of Collegiate Registrars and Admissions Officers (AACRAO), we write to respectfully submit comments on the proposed rule published in the [Federal Register](#) on September 25, 2025, regarding **Docket ID number ED-2025-OS-0679**.

Founded in 1910, AACRAO is one of the oldest nonprofit higher education associations in the nation and represents over 18,000 higher education admissions and registration professionals from 2,300 institutions serving 16.5 million learners worldwide. We provide professional development and voluntary guidance for the higher education community regarding record management, admissions, enrollment management, administrative information technology, and student services.

We strongly support the U.S. Department of Education's effort to strengthen the ties between the education and workforce communities for the benefit of all Americans. We believe that the Department is moving in a promising direction in this statement:

(d) Support the development of talent marketplaces (including credential registries, skills-based job description generators, and learning and employment records) that connect employers, students, and jobseekers by converting job descriptions and learning assertions into discrete, industry-recognized competencies.

AACRAO has been working for decades with institutions of higher education to expand and evolve the idea and delivery of the transcript. We believe the idea of the transcript needs to continue to evolve as we transition to a digital talent marketplace driven by the recognition of skills and enabled by artificial intelligence (AI). We also believe widespread adoption of Learning and Employment Records (LER) will equip learners with significantly better tools to articulate and leverage their skills by fostering collaboration across academic modalities, work-based learning, and employment. Equipping individuals with tools that enable the recognition of their skills throughout their lives will open opportunities for both employment and further education. For additional insights into AACRAO's work to advance the Learning

and Employment record, please see the [LER Accelerator](#) coalition, the [LER principles](#), and the [Infuse public purpose credential infrastructure](#) work.

We applaud the Department for taking the step to formally recognize LERs as a vital part of the talent marketplace. The language used at this early stage is very important as it will set the foundation for the future of LERs. With this in mind, below we propose three clarifying changes which we believe will strengthen the priorities statement:

1. Four of the definitions (Credential Registry, Learning and Employment record, Skills-Based Job Description Generator, Talent marketplace) include the phrase “**maintained by a State or State Workforce Agency.**” We believe the term “**maintained**” needs additional clarification. We recommend that a definition of this phrase be added for clarity. Suggested language:

“**Maintained by a State or State Workforce Agency**” means a system, database, record, interoperability standard, or platform that is established, owned, operated, regulated, or administered under the official authority of a State government or a designated State Workforce Agency.

The term includes systems for which the State or Agency:

- (1) Holds legal or administrative responsibility for the system’s operation, functionality, interoperability, or policy compliance;
- (2) Directs, oversees, or regulates the collection, storage, sharing, or updating of data contained within the system; and
- (3) Ensures the integrity, security, and confidentiality of the information in accordance with applicable federal and State laws.

The term does not include systems merely funded, accessed, or used by a State or State Agency without such administrative control or responsibility.

2. The definition for **Learning and Employment Record** does not contain the necessary and understood characteristics of the LER. In addition to revising the “**maintained**” language, we suggest that item (d) from the Talent Marketplace definition be moved into the definition of the LER. The definition would then be:

“The term 'Learning and Employment Record,' with respect to a Talent Marketplace, means a digital tool maintained by a State or designated State Workforce Agency, as defined at [29 U.S.C. 3225a\(a\)\(8\)](#). Definitionally, the Learning and Employment Record is a curated and interoperable individual record of achievement, learning, and employment that will support career pathing and identification of employment opportunities.”

3. With the expanded definition of the Learning and Employment Record, AACRAO supports the definition of the **Talent marketplace.**

Thank you again for recognizing LERs as a vital part of the talent marketplace. We hope our comments serve to strengthen America's innovation economy. AACRAO is committed to working with the Department to further advance these efforts related to LERs and workforce development. Thank you for your attention to this important topic.

Sincerely,

A handwritten signature in black ink, reading "Melanie Gottlieb", with a long horizontal flourish extending to the right.

Melanie Gottlieb
Executive Director, AACRAO