

**Testimony of Scott Pulsipher  
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Chairman Owens, Ranking Member Adams, and members of the Subcommittee, thank you for the opportunity to share my perspective on the value of learning and employment records (LERs) for individuals, higher education, and the workforce.

**Introduction**

Higher education can serve many purposes—advancing research, transferring knowledge, and more. Ultimately, it was created to serve individuals. Yet somewhere along the way, institutions, accreditors, and employers became the primary beneficiaries instead. How might those in positions to shape our post-secondary system, and the broader talent economy, reimagine models with the student at the center?

At Western Governors University (WGU), we believe that when education is designed to benefit individuals first and foremost by connecting them with opportunity, the workforce and broader society also benefit. After all, when individuals experience the transformative power of education, they're better equipped to drive progress for the organizations they serve, resulting in shared societal impact. Guided by that core belief, WGU reinvented many traditional elements of higher education to build a fundamentally different kind of university: one designed to unlock the talent inherent in every individual and activate them into opportunity.

To better serve America's diversity of learners, WGU is technology-enabled and *competency-based*, meaning students progress by demonstrating what they know and can do. This foundation continues to power innovations that make individuals' capabilities visible, verifiable, and valued across education and employment. LERs are the next step in that evolution—now available to more than 2.5 million WGU students, alumni, and employees to help them showcase career-ready skills.

But realizing the full potential of this innovation requires both individual and collective action. Singular institutions (e.g., universities, employers, associations) innovating on behalf of individuals, must also combine with collaborative public-private efforts to build a shared "skills infrastructure" that, like physical infrastructure, powers mobility and productivity across the talent economy. By building on

existing momentum, we can architect a system where skills are the currency of opportunity, opening pathways to millions more Americans.

## Misalignments in the Talent Economy

A functioning talent economy connects inherently capable individuals, who require access to skills, knowledge, and networks, with a workforce that depends on human talent to thrive, ensuring both sides engage effectively for mutual growth and economic progress. While individuals possess vast inherent capabilities, the systems that should connect them to opportunity—education, credentialing, and workforce—remain fragmented, outdated, and misaligned.

### *Gaps in Infrastructure*

As outlined in the Administration’s recent America’s Talent Strategy, learning and employment data are disconnected across K–12, higher education, workforce programs, and employers. Without shared standards or infrastructure, each sector rebuilds its own verification and compliance processes, driving up costs, duplicating effort, and ultimately passing the burden onto taxpayers.

What should be a seamless, earn-and-learn pathway becomes a bureaucratic maze, deterring both learners and employers from participating.

### *Information Asymmetries*

More than [one million](#) degree and non-degree credentials are currently available in the United States, awarded by some 60,000 providers. Yet there is no standardized or verified means for validating these credentials, making it difficult to determine which lead to job-ready skills. It’s no wonder 65% of employers say they want more data to validate non-degree credentials, according to a 2023 UPCEA report.

This information asymmetry, however, is most acutely felt by the individuals themselves navigating the education and work landscape. Too often, job seekers don’t know which skills they must develop to access in-demand jobs, or how their existing skills translate into job opportunities. Even those with formal credentials experience a disconnect between what they thought was needed to access opportunity and what is actually required to succeed in the job market. In a [survey](#) from Hult International Business School, less than a quarter of recent college graduates believed they had the skills they needed

### **Navigating a Disjointed Landscape**

Education and workforce frameworks were designed to operate in siloes, so navigating earn-and-learn pathways—such as a competency-based or apprenticeship degrees—can feel needlessly complex. As a result, scale is difficult to achieve. These friction points also represent opportunities for innovation that maintains quality while reducing complexity. Key examples include:

- **Licensing barriers:** Aligning state licensing requirements with apprenticeship pathways (e.g., Alabama Student Nurse Apprentice designations)
- **Time-based barriers:** Enabling credit for prior learning and competency-based education as primary tools to bridge apprenticeship learning with traditional academic pathways.

for their current role, while three-quarters of HR leaders said most college educations aren't preparing graduates at all for their jobs.

In many cases, a skills gap does indeed exist, signaling a need for greater alignment between our education institutions and employers. In other cases, however, a skills gap is not the primary problem. Instead, what we see are individuals who have the knowledge, skills, and abilities needed to fulfill various roles, but who lack the means for validating and communicating what they know and can do because they acquired these abilities outside of formal education.

### ***One Solution: Learner Employment Records***

LERs are secure, skills-rich digital credentials that make an individual's skills both visible and verifiable, whether they were acquired through formal education, work experience, military service, volunteerism, or other life experiences. By recognizing skills development and learning wherever it happens and presenting it in a standardized, interoperable format, LERs enable a fuller and more accurate representation of a person's capabilities. LERs offer a promising solution to the inefficiencies and gaps in access embedded in today's education and workforce systems. Particularly for the [80 million](#) Americans who possess valuable skills developed through work or life experience that remain unrecognized, access to LER platforms can be transformative.

By surfacing verified skills across a lifetime of learning, LERs empower individuals to take a more active role in navigating their careers. With a comprehensive record of achievements, job seekers can readily evaluate and identify opportunities that align with their abilities, understand skill gaps and the pathways to close them, apply for roles using evidence-based credentials, and share proof of their skills with employers, schools, or training providers. In doing so, LERs shift agency to the individual, enabling career mobility that is based not on pedigree, but on an individual's proven skill and ability.

Critically, LERs also create value for employers by bringing much-needed transparency to the hiring process. Two graduates with the same degree title may leave their programs with very different levels of knowledge and ability, depending on institutional priorities, course design, or individual performance. By capturing verified learning outcomes rather than relying solely on credentials, LERs allow employers to distinguish between candidates based on what they have demonstrated rather than where they studied, supporting more informed decisions. This inclusive approach helps to level the playing field and expands the aperture through which employers view talent, helping them to access a broader, more diverse pool of qualified candidates.

The need for this shift has never been more urgent. As artificial intelligence tools make it increasingly easy for applicants to generate polished, job-specific résumés, employers are being [buried in AI-generated resumes](#) and finding it harder to distinguish genuine capability from well-crafted presentation. [Some companies](#) are already moving toward skills assessments, portfolios, and real-world tasks to verify

talent. LERs can strengthen this evolution by embedding skills-level verification directly into the application process, increasing employer confidence and dramatically reducing the time and cost of vetting candidates.

### ***System-wide Benefits***

Crucially, LERs enable more scalable models of work-based learning and earn-and-learn models that blur the boundaries between education and employment. A recent [study by JFF](#) found that 83% of employers believe work-based learning is among the most effective strategies for closing skill gaps, yet only 20% have implemented such programs at scale. LERs can help bridge that gap. As digital infrastructure connecting learning and labor markets, they make it possible to expand and streamline work-based learning, ensuring that every skill acquired through work is recognized and transferable.

Additionally, LERs can reduce administrative burden by automating eligibility verification and performance reporting for federal and state workforce programs. For instance, digital tools like LERs can simplify the complex reporting requirements tied to registered apprenticeships, which are often cited as a key barrier to scaling the proven model. Recognizing this need, WGU and Craft Education, a platform for managing apprentice-based programs and on-the-job training, are building a system that enables partners to track work-based learning and integrate learning, funding, and programs in real-time. By reducing manual documentation and improving interoperability, tools like these allow educators and employers to focus on outcomes rather than compliance—enhancing efficiency, accountability, and learner success.

It's important to recognize that this technology is distinct from, yet a needed complement to, other employer-facing systems, such as HR management platforms, which help organizations manage talent internally. As described in the research of the American Workforce Policy Advisory Board, businesses and their employees have a critical role in the development of skills infrastructure through skills-based hiring practices. As an early adopter, IBM has fully integrated a skills-based approach into its entire lifecycle from external hiring to internal development and career pathing, including an LER-like robust digital badging platform. Walmart has also played a pioneering role both through internal talent practices and philanthropic investment.

### **WGU's Role in Building Skills Infrastructure**

WGU was founded 28 years ago by a bipartisan group of 19 governors to address many of the challenges that continue to vex traditional institutions today. Our founding governors recognized that many in their states were not served well by existing postsecondary institutions, including those with some college but no degree, individuals from low-income backgrounds, students who are the first in their families to attend college, and/or residents of rural communities.

To better serve the needs of these individuals, the nonprofit was designed to be flexible, accessible, and closely aligned with workforce needs, leveraging technology to dramatically expand access and reduce costs, and employing a competency-based education model that measures learning on demonstrated mastery rather than time spent in class. To ensure our programs prepare graduates to succeed in the world of work, WGU harnesses external expertise and convenes program-level advisory boards to identify in-demand skills and define the full scaffold of learning outcomes. This approach guarantees graduates enter the workforce with verifiable, job-ready skills—an early precursor to the principles behind LERs.

WGU is now the largest university in the nation graduating more than 60,000 individuals per year and supported by an alumni network of over 410,000. Today, it is more than a university and has grown into a system of impact-driven organizations working to pioneer innovations that connect learning to work and shape a talent economy where opportunity works for everyone.

#### **Our Model Works**

WGU's model is designed with the student at the center and optimized to deliver tangible value to every student. To that end, 89% of WGU graduates are employed in their degree field, compared to 84% of undergraduates nationally; and our graduates see an average salary increase of more than \$21,000 within two years of graduation. With 93% of employers rating our grads' job performance as excellent or extremely good, it's clear that the benefits of these outcomes extend beyond individual alumni, generating billions of dollars for local economies, and uplifting families and

#### ***WGU's Learning and Employment Record Platform***

Building on our legacy of innovation, WGU has been among the first institutions to develop and deploy a scalable LER Platform solution.

Initially conceived in 2019, WGU's LER Platform emerged as part of the American Workforce Policy Advisory Board's demonstration projects, which explored the future of the nation's talent pipeline and how technology could make skills more visible and verifiable. That early prototype evolved in 2020 into the Indiana Achievement Wallet, a pilot that provided a digital record of learning and work achievements.

Now available to nearly 2.5 million students, alumni, and employees, our LER platform is designed to be student-centric, skills-rich, and provide pathfinding and career exploration from day one.

- **Student-centric:** WGU's LER platform was built as a student-first solution, designed to give learners the agency to verify their skills, identify gaps, and share their verified education and career achievements in a secure, portable record.
- **Skills-rich:** Our LER platform is not merely a collection of digital credentials; it is skills articulated. WGU was uniquely positioned to build skills-rich LERs given our approach to program design that: 1) defines workforce skills and groups them into competencies; 2) creates assessments to verify mastery of competencies; and 3) builds courses to prepare students for

those assessments. This approach stands in contrast to what is often practiced at other institutions, where degrees are organized around courses and general statements of purpose rather than a clear articulation of the cumulative knowledge, skills, and abilities expected of graduates.

- **Pathfinding and Career Exploration:** More than just a tool to connect with employers, WGU's LER platform is designed to be used as soon as students begin their educational journey, helping them to understand their current skill profile, discover career pathways, and follow a personalized roadmap toward their desired profession. In this way, LERs unlock powerful pathfinding tools, allowing students to explore without drifting aimlessly and racking up student debt in the process.

### ***Early Results***

Early feedback underscores the potential of this model to drive clarity, confidence, and career mobility:

- **87%** of users found value in having all their education and career information in one place.
- **78%** said seeing their skill gaps helped clarify how they qualify for certain jobs.
- **76%** believe LERs will help them advance in their careers.

For students like Dennis Maksimov, a bachelor's student in Cybersecurity and Information Assurance, that value is already clear. Like many new learners, Dennis wondered how he would build a professional network, connect with employers, and translate his growing skills into real opportunities. When invited to test the beta version of the LER platform, he found what he described as a hybrid of all the tools he already used, but built in a way that made sense.

"I can do all these things in one place. I don't have to go to five different things to achieve one purpose," he shared.

For thousands of students like Dennis, WGU's LER platform represents a dynamic bridge between what they know, what they can do, and what comes next.

### **Creating a Skills Infrastructure**

Innovations like LERs and the technology platforms that enhance them often feel technical and abstract. But few things are more profoundly human than empowering individuals to live self-determined lives by translating what they know and can do into real opportunity.

At the same time, to unlock system-wide, scalable benefits—and to correct the persistent misalignments in today's talent economy—we must build the infrastructure that makes individual empowerment

possible at scale. Just as physical infrastructure enables mobility, productivity, and commerce, skills infrastructure enables mobility, productivity, and equity in the talent economy. By capturing, verifying, and exchanging data on skills and learning, they make it possible to match human capability with opportunity, unlocking potential at scale.

Yet creating a skills infrastructure is both a collective action problem and a governance problem. Each stakeholder waits for another to move first: employers hesitate to define skills frameworks because higher education hasn't aligned to them; higher education resists because employers' expectations remain inconsistent and fragmented; and government, recognizing that legislation cannot easily mandate culture change, technology adoption, or standardization, remains largely in a bully pulpit role.

Without new models of collaboration, the result could be like a stalemate—no one is directly incentivized to invest in the connective infrastructure that would benefit all. Despite these structural challenges, meaningful progress is underway—as recent federal initiatives, state-led pilots, cross-sector coalitions, and emerging technologies collectively signal a shift from fragmented efforts toward a more connected and interoperable skills ecosystem.

### ***Momentum is Building***

The Administration has already reinforced the momentum for integrated data systems per recent Executive Orders to integrate siloed education and workforce systems and the resulting America's Talent Strategy. Recognizing that learners need clear insight into the market value of their education and training, the Departments are developing a public "Credentials of Value" scorecard. This initiative will create the transparency backbone necessary for a trusted, data-rich skills ecosystem.

Several states—including Alabama, Arkansas, Colorado, and Indiana—are creating robust multi-agency public-private partnerships to test and implement solutions aimed at connecting jobseekers and employers. Alabama's Talent Triad initiative, for example, includes 19 state agencies and a coalition of employers, nonprofit groups, education and training providers, and labor-market data platforms to create a statewide skills-based hiring ecosystem.

As outlined recently by the [Aspen Institute](#), major associations and coalitions are now coming together to champion LER adoption, including the LER Accelerator hosted by the American Association of Collegiate Registrars and Admissions Officers (AACRAO), the Digital Credentials Consortium at MIT, Skills-Driven State Community of Practice hosted by the National Governors Association, and the U.S. Chamber Foundation's T3 Innovation Network. These coalitions play an important role in addressing the collective action problem by driving awareness, addressing barriers, and laying the groundwork for a fully integrated system.

Finally, recent technological advancements are increasing the technical feasibility of adoption. Tools like large language models have the potential to make the development of skills-rich programs far less resources intensive while maintaining high quality and relevance. [Early research](#) indicates that LLMs provide comparable evaluations to experts regarding the skills learners are expected to acquire. Automating the research and synthesis work could allow humans to focus on validation, contextualization, and pedagogy.

## Policy Recommendations

As policymakers consider their role in shaping the future of education and work, one tenet should guide every decision: keep the individual at the center.

Within the specific context of policy to advance skills rich credentials and LERs, federal policymakers should align with the following three principles to incentivize innovation and accelerate adoption:

- 1. Drive actors to create LERs for individuals' use and benefit:**

Prior investments in broadly implemented technologies, such as electronic health records, [showed that without proper incentives](#), the individual end user may not retain ownership of their own data. Therefore, meaningful federal policy should support an ecosystem designed to ultimately benefit the individual learner and worker, rather than the technology provider, and employ [consensus qualities of LERs](#) as outlined by the American Workforce Policy Advisory Board.

- 2. Help to architect a robust ecosystem of actors:**

While LER platforms are rapidly maturing and increasingly interoperable, the [ecosystem required](#) to support their use remains underdeveloped. Therefore, meaningful federal policy should simultaneously support multiple actors in the ecosystem to develop and implement LER platforms, including providers, states, and employers. For example, Congress could support and further incentivize state-based LER investments through existing programs like the Workforce Data Quality Initiative, while promoting the usage of open data standards to support interoperability.

- 3. Incentivize innovation without undue government burden or market interference:**

As outlined in the [American Workforce Policy Advisory Board's \(AWPAB\) LERs whitepaper](#), there is general consensus that the private sector is primarily responsible for the technological, governance, and management innovations that leverage the potential of LERs. Further, while



government investment in digital technologies is necessary, prior investments in technology [demonstrate the risks](#) of government subsidies for technology adoption, including undue market influence and locking in immature technology.

Still, the federal government should play a vital role in shaping the broader ecosystem through its existing education and workforce development programs, which should be examined for ways to incentivize innovation and LER adoption. For example, providers of education and training could be incentivized to adopt LERs by including a competitive preference for such practices in existing grant programs aimed at bridging education and work.

## Conclusion

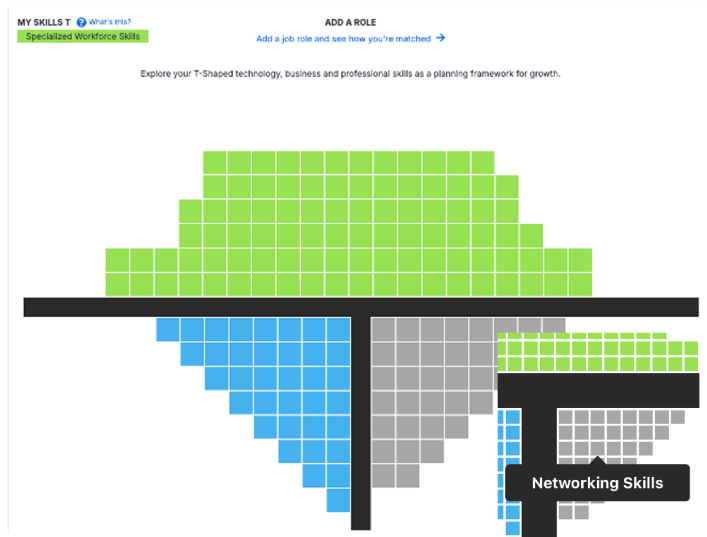
Ultimately, our institutions must get back to their original purpose: serving individuals. Higher education and the broader talent economy exist to expand human potential, not to preserve institutional advantage. WGU's work demonstrates that when systems are designed around the learner—when skills are visible, verifiable, and portable—opportunity radiates outward, strengthening families, communities, and the workforce as a whole.

Where we have long digitized the physical and financial “supply chains,” the most important supply chain—talent—must finally come into the digital age. Doing so will make the system more aligned, more efficient, and especially more equitable. Unlike the supply chains of goods and capital, however, this one is profoundly human, built on aspirations, abilities, and potential. This digital transformation would break down the vestiges of exclusivity and privilege and amplify the worth and potential of every individual—not by extracting their data, but by empowering them to own and share it on their terms.

The next phase of progress depends on extending that student-centered design beyond any single institution and into the shared skills infrastructure that underpins our economy. By aligning technology, policy, and practice around individuals, we can build a future where skills are the true currency of opportunity—and where every learner has the power to convert their capabilities into prosperity.

## Appendix

### Exhibit A: WGU's LER Platform ("WGU Achievement Wallet") Skills Profile



The skills profile, shown here, features interactive, colored blocks that represent skills. Hovering over each block reveals the skill name and detailed information can be accessed.

The graphic is prominently displayed in the user's profile and categorizes skills into technology, specialized, and essential buckets, providing a quick visual overview of competencies.

### Exhibit B: WGU's LER Platform ("WGU Achievement Wallet") Career Pathways Exploration

The Career Pathways section of the WGU Achievement Wallet is designed to help users explore and manage their career aspirations. This section allows users to investigate various job roles and understand how their skills align with these roles or where gaps exist.

