



SkillTRAN LLC

**3910 S. Union Court
Spokane Valley, WA 99206-6345
(800) 827-2182 (Voice & Fax)
www.skilltran.com**

Software & Internet Services for Vocational Decisions

July 22, 2015

Office of Information and Regulatory Affairs
Attn: OMB Desk Officer for DOL-BLS
Office of Management and Budget, Room 10235
725 17th Street NW
Washington, DC 20503

Re: ICR Reference Number 201502-1220-006

Dear Desk Officer:

The following are comments submitted in response to the 6/22/2015 Federal Register request for comments about the ICR - Occupational Requirements Survey (ORS). I have responded multiple times in the past and will continue to contribute comments about this important effort.

This response comes from my lengthy work experience using the venerable *Dictionary of Occupational Titles* (DOT) as both a user since 1975 and as a software developer since 1985. SkillTRAN is a Washington State LLC exclusively focused on the electronic delivery of occupational and labor market data useful in many market segments. We have used the DOT as the hub for our product line for more than 30 years, so the planned change to something substantially less comprehensive than the DOT has a huge impact on our base of nearly 5,000 customers, including the Social Security Administration (SSA) itself. The concerns reflected in these comments will impact not only the SSA in its claims adjudication process, but it will impact all professionals serving persons with disabilities. It is imperative that such a massive change as what is being undertaken occur with careful forethought to the practical impact to this important and growing population of people.

Necessity / Practical Utility

There is no question that fresh occupational data is needed. Eighty percent (80%) of the 1991 DOT data was actually last updated in 1977 – nearly 40 years ago! Since that time, many DOT occupations have been combined with other DOT occupations, which have likely increased the requirements to perform some of these remaining occupations. Other DOT occupations have vanished due to automation, obsolescence, or offshoring.

In its movement away from the DOT, the US Dept. of Labor (DOL) introduced its initial version of O*NET in 1998. Since that time, there have been 20 new versions of that

occupational database. Unfortunately, the methods and the factors collected for the O*NET have not met the needs of SSA for its purposes of disability adjudication.

The current ICR is intended to remedy that oversight by collecting detailed physical demand, environmental, and mental-cognitive factors that have emerged from SSA's expressed needs, input from many stakeholders in the Occupational Information Development Advisory Panel (OIDAP – 2008-2012), SSA's disability evaluation constructs (DEC), and numerous comments/suggestions through the previous stages of public comment leading up to this ICR request. The process has been arduous, particularly for affected stakeholders! But the end result is a better survey instrument than initially proposed, which is a reflection of continuing efforts by both DOL and SSA to respond to the expressed concerns. Such responsiveness is reflected in the 2015 Supporting Statement for the ORS, Part A, Section 8, pp 5-15. Together with BLS intent to engage outside consultation recommended by Michael J. Handel in his Executive Summary of the Methodological Issues Related to the ORS Data Collection, I support this proposed data collection effort, particularly with development and validation against the proposed "gold standard" of direct job observation, which has been clearly shown as the more valid approach for collection of both physical demand and environmental factors. There are areas which merit continued/continuous improvement, but the current framework sets the stage for it.

While BLS and SSA are representing this as a "new Occupational Information System", it is not. Rather, because it is based on the 974 unique O*NET codes (8-digit SOC codes), it is rather an extension of the SOC-O*NET system rather than a new system. This is desirable since other characteristics that were collected in a very different manner (user-reported vs. employer-reported) will be useful for additional rehabilitation purposes beyond SSA disability adjudication. It should be noted that while there are indeed 1,100 O*NET codes, only 974 of these represent detailed and distinct occupational definitions. The remaining 126 are summary category group labels, not individual occupations.

Accuracy of the Estimate of Respondent Burden

The amount of time estimated to be spent on collection of the physical demand and mental cognitive sections is very low compared to a more reliable method of direct observation in addition to discussion with HR personnel and small business owners about job requirements. Real world job analysis experience by rehabilitation professionals shows that a greater amount of time spent in these critical areas will lead to more accurate data collection. BLS has similarly noted improved data quality when doing direct observation of the work being done. It will take some additional time to directly observe and measure the physical activities and environmental conditions of some occupations.

The greatest expense in this effort is finding employers willing to participate (which apparently has not been a problem) and getting BLS job analysts on site. Some additional time spent in actual observation of the occupation being performed will greatly enhance the quality of the collected data. While outside of the "normal way" that BLS job analysts have historically collected data, data accuracy will also be improved by actual measurement of weights lifted, pushed/pulled, distances traveled, and decibel

levels in the work environment. It is good to see that temperature, noise and humidity levels are to be measured. Weights lifted, forces used to push/pull should also be objectively measured with a readily available, inexpensive test gauge. This enhances the credibility of the physical demand data with very little extra cost.

Enhancements to the Quality/Utility/Clarity of Data Collection

On page 2 of the ORS Survey 4 PPD-4P and ORS Survey 4 PPD-4G, consider adding "In what other specific occupations or industries?" to the Experience block.

Mental-Cognitive elements have evolved a great deal since initially proposed. Page 3 has room for a question about "Responsibility for Quality". Some occupations focus on production more than quality. Other occupations require extremely precise quality control. More and more manufacturing industries are focused on "lean manufacturing" techniques. This dimension has been overlooked in these data collection forms.

On page 4, there is a typographical error in the last row: "long-rage" should be "long-range". Additionally, this last cognitive element about work-related interactions continues to mix too many concepts into a single rating scale. It is a confusing mix of factors such as: information sharing, coordination, problem solving, persuading/soft-selling, interacting, influencing, asserting control, calm under fire (resolving controversy), planning, supervision, leadership, and presentation skills. This issue continues to persist because of the elimination of the "Work Situations /Temperament" factors and the Data-People-Things constructs that really ARE helpful to understand "what it takes" to perform an occupation. This last question needs further improvement, which could be achieved by adding back many of the important Temperament factors that really do differentiate "make or break" aspects of some occupations. SSA has resisted these because of the belief that these are traits that a worker brings to the job. That is only partly true – some occupations really do require the worker to either bring this to the job or step up their performance or they will lose the job! The job/occupation really requires it, particularly in this transformed work society in which "soft skills / people skills" make or break actual job performance and retention. The DPT and Work Situation/Temperament factors are real occupation-specific issues.

Physical demand and environmental conditions factors being collected in this effort are significantly improved from the historical DOT factors. Most have been disaggregated into simpler units to measure and report. These discrete factors should not be re-aggregated to the old DOT definitions when real data is finally reported.

On page 5, walking should be a discretely collected factor, separate from standing. Balance has been omitted completely, which I believe is a mistake. Trunk rotation, a common source for back injuries, continues to be absent from this list, another mistake. Also missing are: Depth Perception, Color Vision, and Accommodation (rapid changes of focal length).

On page 6, Fumes has been reasonably combined with other Hazards into a new group called "Hazardous Contaminants". The list of suggested materials should also include these: [Radiation (Nuclear, microwave or electromagnetic); Biohazards; Other].

The venerable but aged DOT has 12,761 unique occupations. These are being aggregated down to 974 O*NET occupations only. Some of these groups contain hundreds of DOT occupations. The variability of values obtained for critical factors such render them functionally useless.

A glimmer of hope exists if enough data can be gathered particularly for the most troublesome SOC groups (those with the highest variability of SVP/Strength) by sufficiently sampling enough of the NAICS groups in which the occupations occur. A SOC occupation performed within an industry is likely to be more consistent in terms of physical demand and SVP.

NAICS coding should go to at least a 3-digit level of coding and probably to a 4- or 5-digit NAICS coding level for greater precision. This will permit direct linkage to critical labor market data for numbers of people employed nationally in these targeted industries. This may well require an increase in the sample size to achieve results at a reliable level ... but so be it. It must be done and done well, particularly for the occupations showing the largest standard errors.

This data collection effort fails to collect any information summarizing the primary activities and purpose of the work being done by the worker or any areas of specialization in which this work is done. SSA has signaled its intent to use the T2 data (Tools & Technologies) for this purpose. T2 has recently been expanded to now encompass more than 63,000 unique tools and technologies. In the DOT, there are 96 Work Fields and 384 Materials, Products, Subject Matter, and Services (MPSMS) codes that are essential to the examination of occupations that may be transferable from one occupational group to another. The lack of simpler Work Fields and MPSMS coding associated with the new data collection effort will fundamentally change and enormously weaken the ability of SSA to perform transferable skills analysis for older workers. I believe this to be a significant omission from work which SSA is obligated to do as defined in the Code of Federal Regulations 20 CFR 404.1568(d). Even the highest aggregation level of T2 coding (Intermediate Work) does not approach the quality of the existing Work Field structure.

BLS created an initial ORS Collection Manual. It was a very good start to carefully identify each of the factors collected. The manual must be totally free-standing and include all information in it directly rather than just refer to another manual or procedure that is inaccessible to a non-BLS person. Descriptions of each of the elements should be done in concert with language used also by rehabilitation, mental health/psychological care, and healthcare professionals. SSA must interpret the data collected in terms of the information reported by these kinds of professionals in its adjudication process. The ORS Collection Manual should be very carefully vetted by these kinds of professionals prior to the full data production collection effort. The ORS Collection Manual must be completed prior to the full production collection. The latest version of this manual was omitted from the material made public in the ICR comment period.

Part B. Collection of Information Employing Statistical Methods

The "normal" NCS survey method selects companies (establishments), then interviews them to determine what occupations exist in each company/industry. I believe that a more efficient method to approach this and to provide a better stratified sample of occupations is to use the OES (Occupational Employment Survey) staffing patterns by industry to already know which occupations to expect in what density prior to walking in the establishment's door. There are clear, well-established patterns of staffing, industry by industry. The OES survey program already understands all this. There should be a coordinated effort to combine these approaches to assure that the best data is most quickly obtained by SSA given its substantial investment in BLS services. Both OES and NCS should work cooperatively to produce the best possible results in the shortest amount of time. Perhaps some of the OES respondents would also be willing to help NCS in its data collection effort.

The OES effort covers 1.2 million establishments in a 3 year period. The ORS will contact about 33,000. The ORS effort is significantly more limited in scope and sampling error variance is expected to be much higher when done the traditional NCS way. Please select establishments not based on industry first; instead focus on occupations first, then the most predominant industries in which the occupation is found. After all, this is the Occupational Requirement Survey, not the Industry Requirements Survey.

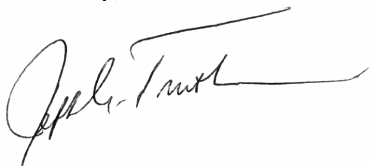
The OES program typically reports hundreds of NAICS industries per occupation. With an average of only about 35 total responses per occupation, how can 35 observations in 35 industries (or less) represent the hundreds of industries in which the occupation is found and reported by employers? Some occupations will require substantially greater sampling than the average target of 35.

Consulting, independent input from an I/O Psychologist, as suggested by Dr. Handel, should help to improve and tighten the resulting data set. Kudos to BLS for recognizing this important role, one which the sunsetted OIDAP group would have assumed.

Minimization of Burden

Respondents have been very willing to participate in this extra survey because of its important ramifications concerning persons with disabilities. Field testing has found little to no resistance to these questions because of the perceived benefit to the employer. There should be no hesitation to ask additional important questions that need to be asked.

Sincerely,



Jeffrey A. Truthan, MS, CVE – President
jtruthan@skilltran.com