



TO: OESinfo@bls.gov

US Department of Labor
Bureau of Labor Statistics - Occupational Employment Program

Re: Request for Written Comments regarding Proposed Changes to occupation, industry, and area detail in the OES Survey

Date: June 13, 2016

Context:

SkillTRAN LLC is a private entity specializing in the delivery of data gathered from a wide variety of government data resources. We are heavily dependent on the high quality data gathered and reported by the OES program and by the Employment Projections department at BLS. We are great fans of the work that is done, as it is gathered directly from employers rather than from household survey as at the Census Bureau. There is often a considerable variation between self-reported Census data and employer-reported OES data. I favor the OES data except when it is unavailable at the OES level (such as gender, weekly hours worked, self-employment, etc.).

All of the government data is of great importance to our wide and varied customer base, which includes nearly 5,000 public and private programs and entities. Our focus is to deliver information to our customers which assist them in making important work decisions as particularly relates to persons with disabilities for both claims adjudication (SSA, Workers Compensation, Private Insurers) and return to work decisions and vocational planning for disabled workers, students, and re-entrants to the labor force (public and private rehabilitation providers, vocational experts, claimant representatives, long term disability insurers, work force development, education, military to civilian transition, state workers compensation programs and the VA). Because of our longevity in this niche group of industries, we continue to use the Dictionary of Occupational Titles (DOT) despite its age because of the rich variety of worker trait information collected long ago by direct job observation by trained DOL job analysts.

Since 2009, there is an effort underway and funded by SSA, for collection of similar helpful occupational characteristics at the SOC/O*NET level. This data is currently being collected as part of the Occupational Requirements Survey (ORS), a multi-year data collection effort by staff within the National Compensation Survey department at BLS. Until this data is collected and aggregated/disaggregated into groups that are suitable (have appropriate internal consistency in terms of Strength and Specific Vocational Preparation and other factors) and has been formally approved for use by SSA in its very costly disability programs, the DOT will remain the authoritative reference available to SSA. I do not anticipate that SSA will be able to use this new data until the federal fiscal year 2019 at the earliest.

Since 1985, I have had the opportunity to design, test, deploy, train, and market multiple PC and online services, targeted specifically for an increasingly diverse customer base. We have watched the OES program continue to grow and produce increasingly rich data that is extremely useful in teasing out the daunting task of "how many" people work in a particular DOT occupation. In 2008, we introduced a methodology that has quickly risen to considerable popularity for estimating job numbers at the DOT level. Changes to the OES program at the level of occupational and industry detail will have a significant impact on this methodology. While we can adjust our methodology to accommodate these changes, we do choose to share our concerns with a considerable number of the proposed changes.

Comments:

Changes to the OES program and the level of detail reported for each OES/SOC group by NAICS has a secondary impact on the Long Term Employment Projections prepared by the Employment Projections group at BLS. Please be careful in making these adjustments and consider the impact on the EP program. It is also unknown what impact these changes would have on the current data collection effort by ORS. It is also not clear how these changes would impact SSA’s funding of the ORS data collection for the new Occupational Information System (OIS) it is building.

The stated objective is to “curtail survey detail for lesser-valued products while improving quality of remaining products and allow for new products.” Later, end of paragraph 3, “This is not a proposal to reduce scope, but to change how the data are presented.” I am confused by the apparent conflict between these two statements. While I understand the relevance and cost savings of combining some categories, I do believe that there is some considerable negative impact for certain of these groups as I have detailed and commented below. If the intent of these changes is to reduce the amount of data collected, then there is a substantial change happening. If the intent is to reduce the amount of data reported, but to make the full collected data set available as is often the case in current data sets released by OES, then this is a better scenario.

Nonetheless, we do have some very specific comments regarding these proposed changes.

Reduction in Occupational Detail Reported:

Action	OES/SOC Groups	Comments
OK	13-1021,1022,1023	Strength and SVP levels internally consistent (SVP 6-8)
NO	13-1031, 1032	Do not combine; very specialized knowledge in 13-1032
OK	15-1132,1133	OK to combine; there are fewer systems software developers
NO	15-2091,2099	2091 is a DOT Weight Analyst 2099 is a DOT Cryptanalyst. Consider combining this DOT with 15-1122.00 Information Security Analyst
OK	21-1011, 1014	These issues are often completely intertwined I do encourage BLS to break out public Voc Rehab from Private Voc Rehab Counselors in 21-1015 – reported wage data is grossly underreported for private rehab counselors and it is impeding growth of the occupation
NO	29-2011, 29-2012	Technologists are properly clustered with an SVP of 7-8 in 6 DOTs. The 4 technicians are appropriately clustered with SVP in the 4-6 range. The educational requirements of these two groups are substantially different and should remain so.
OK	35-2013, 2019	OK to combine
OK	35-3021,3022	OK – but be sure to break out well by NAICS industries
OK	39-1011,1012	OK to combine
NO	39-7011,7012	NO – these are very different occupational groups. There are 7 DOTs in this group with Light Strength and SVP 2-4. The 4 DOT Travel Guides, however, range from Light to Very Heavy with SVP 3-7. These include occupations as a dude wrangler, hunting/fishing guide, and alpine guide (mountain climber).

NO	41-4011,4012	These are fairly consistent groups that should not be combined. The 35 DOT occupations in 4011 show strength from Sedentary to Medium and SVP from 5-7, which is right for the technical sales. The 54 non-technical sales are also Sedentary to Medium, but the SVP range is lower from 3-6. Keep these groups as is.
OK	45-4021,4022	The 6 Fallers are more skilled – SVP 2-6 and do Heavy Strength vs. the 2 DOTs that are logging equipment operators with Medium strength and SVP=4. However, this occupation continues in decline with an increase in automation with very few numbers of people (only 6,000 Fallers) to justify the continued separation.
OK	47-4091,4099	OK to combine
OK	51-2022,2023	OK to combine. These groups have 61 DOTs in 2022, but the SVP ranges widely from Sedentary to Heavy and SVP from 2-7. The 2023 group has 10 DOTs with Light to Medium Strength and SVP from 3-7. Please be sure to code the industry employment at a deep level of NAICS coding as it is highly likely that there will be greater/tighter range consistency found in Strength and SVP when deep NAICS coding is considered in the ORS project.
OK	51-2092, 2099	OK to combine, with similar caveat as above. There is only 1 DOT code in 2092, but 29 in 2099. These occupations range from Sedentary strength to Heavy. As above, please deeply code to NAICS 4 and NAICS 5 level depths to improve likely stratification of these critical variables for the ORS project.
NO	51-3022,3023	These are distinct groups. 3022 has 25 DOTs ranging Light to Heavy but with SVP 1-4. 3023 has 4 DOTs, with strength Medium to Heavy and SVP 5-6 (more highly skilled). SUGGESTION: <i>If you want to combine two groups, combine 51-3021 with 51-3021, which is Heavy work, with SVP=6 and has 3 DOTs.</i>
OK	51-1011,1021,1031	There is but one DOT in 1011; 14 in 1021, and 42 in 1031. Strength ranges all over, with SVP from 4-8. This is one occupation that also will likely show greater internal consistency for Strength and SVP when it is broken out by detailed 4-digit and 5-digit NAICS. This will help the ORS to do so.
OK	25-10**,11**	The 1.9 million Postsecondary teachers have been crazily broken out this way for needs of the Immigration Department and issuance of H1B Visas and such (from what I was led to believe some years ago). It is OK to re-aggregate these into a single occupational group, but it would be very helpful to assure better NAICS coding to differentiate between PostSecondary teachers working in a traditional public education setting vs. those in a largely vocational/private setting such as trade schools and specialized schools which develop business, computer, and health-related skills rather than academic skills. Capture using 4-digit and 5-digit NAICS for codes such as 6113, 6114*, and 6115*

Reduction in Industry (NAICS) Detail Reported:

With the few exceptions noted below, I am opposed to combining NAICS industries in most cases. The DOT level of occupational detail often relates to just one or two very specific industry segments. If these industry segments are rolled up into a bigger category, the resulting effect will be an erroneous estimation (inflation) of the number of people actually employed in a DOT occupation. While SSA might want that to happen to be able to deny claims more easily, it would be a great disservice to the applicants who are trying to get a fair hearing despite the woefully outdated DOT. When the new ORS data has been collected and appropriate levels of NAICS coding have been obtained from current data to provide differentiation suitable for claims adjudication, then it becomes time to reconsider any realignment in the manufacturing and wholesale sectors, at least. Until then, continue to use/collect/report these existing NAICS codes (31*, 32*, and 33*). Similar reasoning for the Wholesaler sectors – retain current coding as these are specialized areas.

Agreement with the following:

Combine	4451 and 4452	Occupation distribution similar
Combine	4521 and 4529	Similar occupation distribution
No	4532 and 4533	Dissimilar occupational staffing in these industries
Combine	4831 and 4832	Similar occupation distribution; poor statistical coverage as well
Combine	4841 and 4842	Similar occupation distribution
Partial	4851	This is often a mix of occupations, including subway, light rail, bus
Partial	4852 and 4855	These two industries are more closely related to each other
Combine	5171,5172,5174,5179	Technology advances have so blurred these together that should be easier to bundle these as a single group
Combine	5221, 5223	Similar occupation distribution
Combine	5231,5232,5239	Similar occupation distribution
Combine	5311,5312,5313	Similar occupation distribution
Partial	5322,5323	Similar occupation distribution
Retain	5324	Different occupation distribution
No	56142 into 5614	This is an important category for this growing telemarketing and inbound contact center management
Roll-Up	56151 into 5615	Travel Agencies; Retain other categories for Tour Operators and other Travel Arrangements including Reservation Centers
No	5621 and 5622	Collection of waste and proper disposal of it are two different staffing patterns. Keep this differentiation.

Changes to reported Geographic Areas:

Area Proposal 1 – Table 1 makes more sense to me than the excessive detail of NECTA areas. This would narrow the number of MSA area from 20 to a more manageable 15. Please continue to provide Balance of State (BOS) areas when these may exist.

Area Proposal 2 – While it is tempting to eliminate the Metropolitan Divisions, they do provide some sensibility in terms of providing some boundaries for a reasonable commute range. It is difficult to imagine a Gary, IN worker commuting to Lake County-Kenosha County IL-WI. While these larger MSA areas do indeed exist and function in these densely populated and broad economic areas, I would favor a careful review of how far people report actual commuting patterns prior to aggregating all of them into a single MSA.

Thank you for the opportunity to submit these comments. I would be pleased to respond to any further questions about the reasoning/logic behind my responses.

The most important takeaway I hope that is heard here is that some of these suggested changes can improperly and adversely impact the disabled population of workers. We should be fairly treating these citizens and assisting them properly in return to work activities.

Respectfully submitted by:

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