

**Rick Wickstrom, PT, DPT, CPE, CME** [rwickstrom@orthopt.org](mailto:rwickstrom@orthopt.org)

President, Occupational Health Special Interest Group (OHSIG)

Academy of Orthopaedic Physical Therapy (AOPT)

2920 East Avenue South, Suite 200

La Crosse, WI 54601

March 28, 2021

**Nora Kincaid** [kincaid.nora@bls.gov](mailto:kincaid.nora@bls.gov)

BLS Clearance Officer, Divisional of Management Systems

Bureau of Labor Statistics

2 Massachusetts, Room 4080

Washington, DC 20212

Dear Ms. Kincaid,

Thank you for requesting feedback on the plans for collection and capture of data for the period 2021 to 2024 for the Occupational Requirements Survey (ORS). The Federal Register notice states that ORS is a nationwide survey conducted at the request of the Social Security Administration to collect estimates about occupational data that would allow SSA adjudicators to clearly associate the assessment of a claimant's physical and mental functional capacity and vocational profile with work requirements. ORS Improvements will also benefit job accommodation and rehab counseling.

It has been my pleasure to serve as a liaison and periodic contributor of feedback based on perspectives of physical therapy professionals from the starting point when the OIAP external work group led by Mary Barros-Bailey began its task to support the development of a new occupational information system to replace the Dictionary of Occupational Titles (DOT).

Our OHSIG is an occupational health specialty group in the Academy of Orthopaedic Physical Therapy (AOPT) that has 18,171 member physical therapy professionals. AOPT is the largest academy with the American Physical Therapy Association (APTA). Our OHSIG serves 588 physical therapy professionals with a keen interest in ORS methods for surveying job demands; we work closely with physicians and other acceptable medical sources as currently defined by the [SSA CFR: 404.1502](#), to perform objective functional capacities of injured workers and functional job analyses to address work performance barriers. Attached is our feedback on the ORS for your consideration.

Sincerely,



**Rick Wickstrom, PT, DPT, CPE, CME**

## OHSIG ADDENDUM RESPONSE

### A. SUPPORTING STATEMENT FOR THE OCCUPATIONAL REQUIREMENTS SURVEY

We appreciate the supporting statement from BLS that “The collected data will also advance the mission of the BLS by making possible a detailed analysis and expansion of occupational data from several BLS programs, including the National Compensation Survey (NCS), the Occupational Employment Statistics program (OES), and the Occupational Safety and Health Statistics programs (OSHS), promoting the continued effective use of these data, and disseminating these data to a wider audience.” This supporting statement encouraged our OHSIG to submit feedback to improve ORS that is not limited to SSA’s primary need as the funding agency for more up-to-date data on occupational requirements to replace the DOT when administering Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs.

Given that ORS data supports the design of a new occupational information system to replace the Dictionary of Occupational Titles, our review is focused on the following criteria:

1. Are the sampling methods and search options sufficient to identify realistic employment opportunities for workers with multiple areas of functional limitations?
2. Are the proposed scales for rating job factors appropriately aligned with how occupational health professionals report abilities and limitations of workers?
3. Are the proposed factors reasonable and necessary to promote safe job placement of workers that have a broad range of physical or cognitive functional limitations?

### B. FEEDBACK FOR THE OCCUPATIONAL REQUIREMENTS SURVEY

With the above review focus points in mind, we urge BLS to make improvements for the 2021-2024 data collection to address the following areas of major concern:

1. **We found it disappointing to hear from BLS (Nora Kincaid) that there is no way to search for Occupational Requirements Survey (ORS) data that combine fields (requirement categories) at this time.** Data results following a search for specific physical demand criteria produces percentages and numbers instead of identifying occupations that match multiple search criteria based on a disabled claimant's residual functional capacity. For example, we cannot search for all jobs/occupations that would match a disabled claimant who is limited to Light work, needs a sit-stand option at work, sitting limited to not more than frequent, standing/walking limited to not more than frequent, and stooping/crouching/kneeling limited to not more than occasional. Being able to search for ORS data for job matching capabilities and use combined requirement fields is critical for this survey to have practical utility for SSA, medical-vocational experts, and rehabilitation counselors. It is not clear how data gets combined to assess worker Strength classifications for SSA benefit purposes.

2. **We do not like the proposed change from collecting duration in total hours to selection of ranges that are based on percent of time for physical tolerances under categories such as Reaching/Manipulation, Postural and Climbing.** Please consider presenting ranges that are based on duration in total hours instead. This would be more understandable and consistent with how occupational health medical professionals rate work tolerances for an injured worker. Additionally, “Not Present” Column should be placed before the column with the lowest level of duration. See highlighted OHSIG SUGGESTED MODIFICATION TO 2021 ORS Form below.

2018 ORS Form

Postural – Climbing	Duration	Other
Ramps or Stairs, Structural		Y/N
Ramps or Stairs, Work-related		
Ladders, Ropes, or Scaffolds		

2021 ORS Form

## Climbing

Ramps or Stairs, Structural: ☐ Yes ☐ No

	Up to 2%	2% up to 1/3	1/3 up to 2/3	2/3 or More	Not Present	Present, Duration Unknown	Personal Protective Equipment
Ramps/Stairs, Work-Related:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ladders/Ropes, or Scaffolds:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## OHSIG SUGGESTED MODIFICATION EXAMPLE TO 2021 ORS Form

## Climbing

Ramps or Stairs, Structural: ☐ Yes ☐ No

	Not Present	Up to 10 minutes	10 min. up to 2 hours	2 hours up to 6 hours	6 hours or more	Present, Duration Unknown	Personal Protective Equipment
Ramps/Stairs, Work-Related:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Ladders/Ropes, or Scaffolds:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
High, Exposed Places:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Rationale: The change from specific hours of duration in the 2018 survey to percent of time buckets proposed for the 2021 survey approach fails to address how percent of time ratings relates to tolerance to perform jobs that have different work shift duration exposures. When this percent of time approach was used by the

Dictionary of Occupational Titles, the frequency levels based on percent of time ranges made an assumption that percent of time was based on an 8-hr shift duration. This assumption is not valid for access to many occupations. For example, a part-time worker in a fast food restaurant may be expected to work two back-to-back 12-hr shifts on Saturday and Sunday. This requires 3 times the duration of standing/walking demands than expected of a part-time restaurant worker who works 4-hr shifts to meet peak restaurant demands during lunch or dinner periods.

One of the best features of a previous version of this data form is that the person being surveyed was prompted to enter the total number of hours for work tolerance for each factor that related to work tolerance. This is relevant to how durations are referenced by SSA in the glossary for Exertional Level in their SSR 83-10: Titles II and XVI instructions for determining capacity to do other work (medical-vocational rules at [https://www.ssa.gov/OP\\_Home/rulings/di/02/SSR83-10-di-02.html](https://www.ssa.gov/OP_Home/rulings/di/02/SSR83-10-di-02.html)). For a Sedentary classification, standing or walking should not total more than about 2 hours of an 8-hour workday. The full range of light work requires standing or walking, off and on, for a total of approximately 6 hours of an 8-hour workday. On page 18 of ORS Collection Manual Version 4.1 there is Table 1-2: Duration Scales that communicates definitions for Seldom, Occasional, Frequent, and Constant in terms of both Percent of Time as well as Total Time under the Daily column. For example, Seldom is defined as Up to 2% and by daily total duration as Less than 10 minutes.

3. **Page one of the ORS form be modified to record whether the job was observed and to capture the usual shift duration and maximum duration for employees.**

See example below. This is critical information because it is common for health examiners to prescribe work schedule limitations.

2018 ORS Form

Schedule/Quote: _____		Work Schedule: _____	
Job Title	Work Schedule	Job Description (Y/N)	FT/PT
Job Observation (circle):	Yes - requested	Yes - offered	No
Critical Job Function: _____			

2021 ORS Form

JOB INFORMATION & REQUIREMENTS		Job Description: <input type="checkbox"/> Yes <input type="checkbox"/> No
Job Title	_____	
# Full-time Employees	_____	Full-time Work Schedule _____
# Part-time Employees	_____	Part-time Work Schedule _____
Minimum Education	_____	

**OHSIG SUGGESTED MODIFICATION TO 2021 ORS Form**

JOB INFORMATION & REQUIREMENTS		Job Description: <input type="checkbox"/> Yes <input type="checkbox"/> No
Job Title	_____	Job Observed?: <input type="checkbox"/> Yes <input type="checkbox"/> No
# Full-time Employees	_____	Usual Shift (hours) _____ Maximum Shift (hours) _____
# Part-time Employees	_____	Usual Shift (hours) _____ Maximum Shift (hours) _____

4. On the Lifting/Carrying Section of the ORS Form, we generally like the approach taken to standardize the bucket categories for lift/carry demands under Seldom, Occasional, Frequent, and Constant. Separating the Heavy lift range of 51 to 100 lb. into two buckets of 51 to 75 lb. and 76 to 100 lbs. is commonly done on job analysis and insurance forms for reporting worker restrictions. Suggest improvements:

- Substituting ranges for duration in total for ranges based on percent of time.
- Instead of “None” at the top of each frequency, use “Not Present” for consistency
- Instead of “Most Weight Lifted”, state “Most Weight Lifted or Carried”
- Instead of “Items lifted”, state “Items handled”
- It would be helpful for the ORS Survey to have a global box check under the bucket choices that states “Present, Duration and Force/Weight Unknown

It would be helpful to further clarify each frequency column by adding repetition ranges underneath duration ranges. This would be more consistent with established ergonomic risk assessment methods, such as the American Conference of Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs) for lifting. ACGIH defines Infrequent lifting as  $\leq 12$  Lifts per hour when lifting is done for 2 or more hours per day; Moderate frequency as  $> 12$  and  $\leq 30$  lifts per hour for  $> 2$  hours per day, and Frequent long duration of  $> 30$  and  $\leq 360$  lifts per hour for  $> 2$  hours per day.

#### 2018 ORS Form

Lift/Carry (breaks at 1/10/25/50/75/100 lbs)		
Most weight ever		
2/3 of the time or more		
1/3 up to 2/3 of the time		
2% up to 1/3 of the time		
Seldom (up to 2%)		
Pushing/Pulling		
Hands/Arms		One/Both
Feet/Legs		One/Both

#### 2021 ORS Form

##### Lifting/Carrying

Most Weight Ever Lifted \_\_\_\_\_ lbs. Items lifted \_\_\_\_\_

Seldom (Up to 2% of the time)	Occasional (2% up to 1/3 of the time)	Frequent (1/3 up to 2/3 of the time)	Constant (2/3 or more of the time)
<input type="checkbox"/> None	<input type="checkbox"/> None	<input type="checkbox"/> None	<input type="checkbox"/> None
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible
<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.
<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.
<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> >25 lbs.
<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> >50 lbs.	
<input type="checkbox"/> 76 to 100 lbs.	<input type="checkbox"/> 76 to 100 lbs.		
<input type="checkbox"/> >100 lbs.	<input type="checkbox"/> >100 lbs.		

Note: Duration % = percentage of the worker's time

**OHSIG SUGGESTED MODIFICATION TO 2021 ORS Form****Lifting/Carrying**Most Weight Ever **Handled** \_\_\_\_\_ lbs. Items **handled** \_\_\_\_\_

Seldom Up to 10 minutes Up to 1 time per hour	Occasional 10 min. up to 2 hours 2 to 12 times per hour	Frequent 2 hours up to 6 hours 13 to 30 times per hour	Constant 6 or more hours 31 or more times per hr.
<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible
<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.
<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.
<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> >25 lbs.
<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> >50 lbs.	
<input type="checkbox"/> 76 to 100 lbs.	<input type="checkbox"/> 76 to 100 lbs.		
<input type="checkbox"/> >100 lbs.	<input type="checkbox"/> >100 lbs.		
<input type="checkbox"/> Present, Duration and Weight/Force Unknown			

5. **We recommend that further consideration be given to rating some communication, and communication factors be rated by the level of functional skill rather than primarily by duration or frequency.** This would be more consistent with how health examiners describe cognitive abilities based on standardized tests for people skills, problem solving/reasoning, math, written communication, spoken communication, etc. The DOT approach to RML and Aptitudes offers some good foundation to support this recommended approach. Physical and Cognitive factors with skill levels that can be validated by standardized tests should be prioritized. Examples include ambulation agility, finger dexterity, vision, attention, memory, etc.

We noted that functional skill levels were implemented to some extent for supervisory information. The Supervisory Information could be described as leadership control over work as follows:

- 0 Receives constant monitoring
- 1 Follows detailed instructions
- 2 Follows general instructions
- 3 Leads/instructs other workers
- 4 Supervisors others, one operation
- 5 Manages multiple operations

For example, instead of asking whether People Skills are Basic or More than Basic, People Contacts could be rated by functional skill level:

- 0 No interactions during usual work
- 1 Exchanges simple information
- 2 Coordinates with cooperative parties
- 3 Discuss with gentle persuasion
- 4 Influence by hard sell or control
- 5 Negotiates controversial issues

For example, instead of rating problem solving based on daily frequency, Problem solving/reasoning could be rated by functional skill level:

- 0 Follows very simple process exactly
- 1 Limited choices, simple process
- 2 Limited choices, varied situations
- 3 Multiple choices, varied situations
- 4 Complex choices, varied situations
- 5 Complex, scientific analysis

For example, instead of rating Speaking based on daily frequency, Spoken communication could be rated by functional skill level:

- 0 Not present
- 1 Answers with simple words
- 2 Discuss with basic sentences
- 3 Discuss with normal language
- 4 Fluent professional presentation
- 5 Engaging, public speaker

For example, instead of asking only about the duration of keyboarding, Math/computer applications could be rated by functional skill level:

- 0 Not present
- 1 Add, subtract, multiply integers
- 2 Fractions, percentages, decimals
- 3 Basic statistics/computer functions
- 4 Intermediate statistics/computer
- 5 Advanced computer programming

For example, instead of Telework as a Yes or No response, Written Communication could be rated by functional skill level:

- 0 Not present
- 1 Write/read simple sentences
- 2 Write/read basic correspondence
- 3 Write/review standard reports
- 4 Write/review professional reports
- 5 Author/critique publications

For example, Ambulation Agility could be rated by functional skill level:

- 0 Not present
- 1 Limited walk, small area
- 2 Slow, unhurried walking
- 3 Walking at a brisk pace
- 4 Jogging, level ground
- 5 Running, uneven terrain

6. We don't like the way that Pushing/Pulling factors are surveyed in either the 2018 or 2021 versions of the ORS. Pushing and Pulling was previously referenced under force exertion under the definition for Strength in the DOT. For example, pushing and pulling a wheeled cart, pallet jack, or dolly is a full body activity that requires direct measurement with a specialized force gauge. Theoretically, horizontal push/pull forces such as these could be handled with a similar bucket approach taken for lifting/carrying, with a bucket option added for "Present, Unknown".

## 2018 ORS Form

Pushing/Pulling		
Hands/Arms		One/Both
Feet/Legs		One/Both

## 2021 ORS Form

## Pushing/Pulling

	Up to 2%	2% up to 1/3	1/3 up to 2/3	2/3 or More	Not Present	Present, Duration Unknown	One / Both
Hands/Arms:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Feet/Legs:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## OHSIG SUGGESTED MODIFICATION TO 2021 ORS Form

## Pushing/Pulling

Seldom Up to 10 minutes Up to 1 time per hour	Occasional 10 min. up to 2 hours 2 to 12 times per hour	Frequent 2 hours up to 6 hours 13 to 30 times per hour	Constant 6 or more hours 31 or more times per hr.
<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present	<input type="checkbox"/> Not Present
<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible	<input type="checkbox"/> Negligible
<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.	<input type="checkbox"/> 1 to 10 lbs.
<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.	<input type="checkbox"/> 11 to 25 lbs.
<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> 26 to 50 lbs.	<input type="checkbox"/> >25 lbs.
<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> 51 to 75 lbs.	<input type="checkbox"/> >50 lbs.	
<input type="checkbox"/> 76 to 100 lbs.	<input type="checkbox"/> 76 to 100 lbs.		
<input type="checkbox"/> >100 lbs.	<input type="checkbox"/> >100 lbs.		
<input type="checkbox"/> Present, Duration and Weight/Force Unknown			

The approach to push/pull factors on both the 2018 and 2021 version of ORS surveys appears to be duplicating information that is already collected with other factors. The Pushing/Pulling factor for Feet/Legs is already addressed by the Foot/Leg Controls in the Section for Reaching/Manipulation. The Pushing/Pulling factor for Hands/Arms could be moved under Foot/Leg Controls and labeled as "Hand/Arm Controls". The feet are used only to push and these factors are primarily used by SSA to rate seated activities as LIGHT that require substantial use of foot or arm controls.



7. **Asking about “both” versus “one” side is not the best approach for rating physical work tolerance factors, because this does not align with how medical sources communicate unilateral restrictions for workers. Instead, it would be better to apply the duration scale separately to the dominant and other sides.**

For example, when a worker can't reach overhead because of a severe left shoulder problem, the health professional might communicate "No overhead reaching with the left arm." The current BLS method for jobs would not allow the health examiner to clearly communicate the ability of the dominant arm (unaffected) arm and inability of the injured arm for overhead reaching tasks. One of the great features of the Dictionary of Occupational Titles is that the same scale was applied consistently to all of the same factors that are grouped under the same category. This simplifies search and job match, compared to applying a pick list scale with a checkbox or radio button scale to the same factor. In the example provided, the healthcare professional could identify the limitation "None" for the Other (left) arm and the ability such as "Frequent" for the Dominant (right) arm to communicate how overhead reaching could be accomplished by using the unaffected arm. We would also recommend changing the label for "Gross Manipulation" to "Gross Handling" since the hand is primarily grasping rather than manipulating. We would also recommend changing the label of "Fine Manipulation" to "Finger Manipulation" since this factor includes point and touch screens.

## 2018 ORS Form

Reaching/Manipulation		
Overhead Reaching		One/Both
At/Below Shoulder Reaching		One/Both
Gross Manipulation		One/Both
Fine Manipulation		One/Both
Foot/Leg Controls		One/Both
Traditional Keyboarding		

## 2021 ORS Form

### Reaching/Manipulation

	Up to 2%	2% up to 1/3	1/3 up to 2/3	2/3 or More	Not Present	Present, Duration Unknown	One / Both
Overhead Reaching:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
At/Below Shoulder Reaching:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Gross Manipulation:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Fine Manipulation:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Foot/Leg Controls:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/>
Keyboarding:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**OHSIG SUGGESTED MODIFICATION TO 2021 ORS Form****Reaching/Manipulation**

	Not Present	Up to 10 minutes	10 min. up to 2 hours	2 hours up to 6 hours	6 hours or more	Present, Duration Unknown
Overhead Reaching, Dominant Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Overhead Reaching, Other Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
At/Below Shoulder Reaching, Dominant	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
At/Below Shoulder Reaching, Other Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gross Handling, Dominant Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gross Handling, Other Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Finger Manipulation, Dominant Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Finger Manipulation, Other Side	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

8. We believe that bending/stooping should be rated for duration separately as a factor rather than grouping with lower work factors. This is relevant to how strength is classified by SSA in the glossary for Exertional Level in their SSR 83-10: Titles II and XVI instructions for determining capacity to do other work (medical-vocational rules at [https://www.ssa.gov/OP\\_Home/rulings/di/02/SSR83-10-di-02.html](https://www.ssa.gov/OP_Home/rulings/di/02/SSR83-10-di-02.html)). The considerable lifting required for the full range of medium work usually requires frequent bending-stooping. (Stooping is a type of bending in which a person bends his or her body downward and forward by bending the spine at the waist.).
9. Environmental Conditions category: The conditions listed appear to be a carry over from factors included in the DOT. As health professionals who evaluate a worker's fitness for duty, we see little value in how the ORS is capturing information related to most of the Environmental Conditions. For example, the designation Hazardous Contaminants is overly broad and is not sufficient to evaluate job placement or support disability determinations. For this factor, we like that a checkbox is present to indicate whether personal protective equipment is used, but think it would be much more interesting and informative to ask the person about the type of PPE that is used on the job, either as a checkbox or by rating the duration. For example, we believe that employers will be more likely to share how they are protecting workers:
  - Face mask/covering [ ] Yes [ ] No
  - Tight fit respirator [ ] Yes [ ] No
  - Safety glasses [ ] Yes [ ] No
  - Hearing protection [ ] Yes [ ] No