



O.T. Resources, Inc.

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TO: Nora Kincaid, BLS Clearance Officer, Division of Management Systems, Bureau of Labor Statistics, Room 4080, 2 Massachusetts Avenue NE., Washington, DC 20212. Written comments transmitted by fax to 202-691-5111.

FM: Doris J Shriver, OTR, FAOTA, CLCP
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RE: Federal Register Occupational Requirements Survey

MESSAGE: Thank you for managing this much needed update. AS a forensic occupational therapist for nearly 40 years and a Vocational Expert with SSA-ODAR for over 20 years. I use the D.O.T. nearly daily to define work for patients / clients. It is the basis of several computerized programs that I use, namely the McCarron-Dial Work Evaluation System (developed in the 70's), SkillTRAN (2014), and free Internet programs to access the Dictionary of Occupational Titles. **No doubt, the D.O.T. is outdated, BUT like the US Constitution, being old doesn't make it bad.** WE need to update what we have by eliminating jobs that no longer exist (e.g., elevator operator), deleting outdated terms, adding new technology jobs, tuning up the criteria in the GED (general educational Development) to include redefining Reasoning (could be Executive Function instead) and Aptitude areas to include Emotional Characteristics, etc.

I have spent the last 7 years helping write codes for Physical Medicine and Rehabilitation procedures for the American Medical Association. This isn't the time to re-invent the wheel by doing away with the D.O.T. and going to O'Net or any other publication. We must retain the qualitative measures concept that the D.O.T. uses. O'Net is much too vague and presents nothing that we have tools to measure for performance. We should look instead to WHO documents such as the International Classification of Function for terminology. Bring a document that the world can rely upon.

If I can be of assistance to you, please do not hesitate to contact me. Consider setting up **national regions of experts** that can go through the D.O.T. for **updates on content; a new paradigm that could include education system goals for "occupational justice" by teaching toward real jobs using measurable characteristics; and, a meaningful document that should be "brainstormed" for all its possible uses** in legislation, public enrichment, and definitions of work for surveys.

American society depends upon its workers, at all levels. This is an important project that I fully support. My best to you.

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