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May 15, 2014

Nora Kincaid, BLS Clearance Officer
Division of Management Systems
Bureau of Labor Statistics
Room 4080
2 Massachusetts Avenue NE
Washington, DC 20212

Re: Comments for Occupational Requirements Survey Proposed Collection

Dear Ms. Kincaid

On behalf of our more than 88,000 member physical therapists, physical therapist assistants, and students of physical therapy the American Physical Therapy Association (APTA) appreciates the opportunity to provide comments on the Bureau of Labor Statistics' (BLS) proposed data collection strategy for the Occupational Requirements Survey (ORS). APTA has followed the Social Security Administration's (SSA) initiative to develop a new occupational information system (OIS) to replace the outdated Dictionary of Occupational Titles (DOT). APTA has previously submitted comments and recommendations related to worker-job match taxonomy revisions and emphasizing the critical need for updated occupational data to support appropriate disability adjudication and prevent needless work disability.

APTA's goal is to foster advancements in physical therapy practice, research, and education. The mission of APTA is to further the profession's role in the prevention, diagnosis, and treatment of movement dysfunctions and the enhancement of the physical health and functional abilities of members of the public.

BLS requested comments that focus on four specific areas related to the proposed ORS: evaluate whether the proposed collection of information is necessary for the proper performance of functions of the agency, including whether the information will have practical utility; evaluate the accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; enhance the quality, utility, and clarity of the information to be collected; and minimize the burden of the collection of information on those who are to respond.

APTA supports the necessity of collecting updated occupational data to better inform SSA decision-making, particularly in terms of identifying appropriate and relevant job categories for disability claimants. The vision statement for the physical therapy profession is "Transforming society by optimizing movement to improve the human experience." The ability to move about and interact in work and daily life is a critical component of the human experience. As such, we encourage BLS to ensure that the ORS data collected is valid and clear such that it enables appropriate identification of potential work opportunities.

Concerns about the quality (validity) of ORS survey data

APTA understands that BLS has previously conducted several field tests of the proposed process for collecting ORS data in conjunction with the National Compensation Survey, using a brief survey of typical NCS respondents (human resource directors, small business owners, and location managers). However, we are concerned that there has been insufficient validation of the data gathered by field economists to ensure that the data accurately represents the physical demands of the jobs that were surveyed. While BLS has done some data analysis to compare ORS results to DOT classifications, the results reported in the Phase 2 and 3 reports suggest that there is variance which brings the validity of the ORS data into question. Additionally, because the DOT has not been updated for more than two decades, there are many jobs that exist today that are not described by the DOT, and therefore, no validation of the accuracy of ORS results can be made using the DOT.

The ORS methodology is inconsistent with functional job analysis methodology used to gather occupational requirements for the Dictionary of Occupational Titles, and with the job analysis techniques described in the US Department of Labor's 1991 Revised Handbook for Analyzing Jobs¹. Functional job analysis relies on field observation, measurements, and interviews with the job supervisor and incumbents who are more familiar with the actual functional requirements of the work. The proposed ORS methodology relies on a brief interview of human resource directors, small business owners, and location managers who are not likely to have adequate understanding of the job(s) being surveyed.

Potential adverse impacts of collecting invalid data include both an overestimation of the job requirements, as well as an underestimation of the job requirements. Overestimating the job requirements reduces the likelihood that a disability adjudicator will be able to identify jobs that disability claimants can perform despite their functional limitation. Thus, more claimants are at risk for being inappropriately placed on disability. On the other hand, if job requirements are underestimated, disability adjudicators may inappropriately identify jobs that disability claimants are actually unable to perform, and deny benefits to otherwise eligible individuals.

APTA recommends that BLS undertake a validation study to verify that the ORS data being collected is truly representative of the actual physical job demands. The validation

¹ *The Revised Handbook for Analyzing Jobs*. Indianapolis, IN: U.S. Department of Labor; 1991.

study should incorporate functional analysis of the work demands, and survey the actual job supervisor and one or more incumbents. While this recommendation does increase respondent burden, employers will likely cooperate if they benefit from having additional detailed information about their jobs for use in future decision-making.

An additional concern about the proposed ORS data is that the physical demands for finger dexterity and manual dexterity are not adequately described. Finger dexterity and manual dexterity have been well-established as aptitude factors in the DOT that are not included in the proposed ORS. They are relevant to disability evaluation because many standardized tests exist to measure a worker's performance with respect to these important physical demands. The level of skill or speed required for hand dexterity is a different aspect of job performance than simply recording the total time of exposure in hours for Fine Manipulation or Gross Manipulation with one or both hands. The degree of skill or manipulation speed with one or both hands is more critical for many jobs than the actual total number of hours for hand use.

The BLS Phase 2 report² identifies that "the two elements dealing with the use of the hands, *Fine Manipulation* (fingers) and *Gross Manipulation* (whole hand) had the lowest proportion of matches with large proportions of ORS coding both higher and lower than the DOT value." This finding suggests that it is appropriate for BLS to revisit this survey element and identify a more appropriate scale for rating. APTA suggests that this scale address the skill/speed requirements for finger/hand use rather than duration in hours.

Conclusion

APTA is concerned that the ORS data being collected may not be accurate, and that subsequent use of the data may result in appropriate disability adjudication decisions. APTA encourages BLS to conduct a validation study to verify that the ORS data being collected is truly representative of the job demands.

If there are any questions about our comments or additional information is needed, please feel free to contact Sean Stratmoen, Payment Specialist, Payment & Practice Management, at 703-706-3164 or seanstratmoen@apta.org.

Sincerely,



Paul A Rockar, Jr, PT, DPT, MS
President

PAR: SS

² *Occupational Requirements Survey: Phase 2 Summary Report*. U.S. Department of Labor Bureau of Labor Statistics; http://www.bls.gov/ncs/ors/phase2_report.pdf; accessed May 13, 2014.