To: Nora Kincaid, BLS Clearance Officer, Division of Management Systems, BLS, Room 4080, 2 Massachusetts Avenue, NE, Washington, DC 20212

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Subject: Federal Register Proposed Collection, Comment Request for the Occupational Requirements Survey (ORS) Test, OMB Number 1220-XXXX

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The Department of Labor (DOL) has requested comments about the planned project for adding questions to the National Compensation Survey (NCS) platform. The proposed data are being collected on behalf of the Social Security Administration (SSA) for possible future use by the Social Security Disability Insurance (SSDI) program when making disability determinations affecting millions of citizens of the United States. This data gathering effort (and ultimate database) is duplicative of the existing DOL O*NET database; thus, at least doubling the paperwork burden. As a result, it is not necessary for the "proper performance of the function of the agency."

The intent of the proposed data gathering is to capture up-to-date occupational information ("occupational requirements data elements") that the SSA staff now finds in the Dictionary of Occupational Titles (DOT) and associated works, as well as to measure occupational characteristics that were not in the DOT. The premise of the notice is that there are no existing sources for updated occupational data to meet SSA's needs.

Decades ago the DOL decided to replace the DOT with more reliable occupational information relying on rigorous data sampling and collection standards. Significant contributions were made by recognized experts in the field of occupational analysis and statistics resulting in the DOL Employment and Training Administration's (ETA) O*NET program. The O*NET online occupational descriptions and accompanying data (that are freely accessible on the internet) are continuously updated through DOL ETA's partnership with public and private-sector organizations including the North Carolina Department of Commerce, Research Triangle Institute (RTI), the Human Resources Research Organization (HumRRO), North Carolina State University (NCSU), MCNC, and Maher & Maher.

According to the DOL's O*NET website, O*NET "was designed to be the nation's most comprehensive resource of occupational information with a database system that includes 275 descriptors about each occupation" (http://www.onetcenter.org/hr.html). To the extent that all of SSA's requirements currently are not covered by the 275 occupation descriptors, it would be far more efficient to add a few items to the existing O*NET surveys than to continue with the multi-million dollar project with the DOL's Bureau of Labor Statistics (BLS) merely to *test* other data collection tools and techniques.

Finally, much of the proposed work seems to be targeted at determining "how best to collect the occupational requirement data elements" and to test different forms and methods of data collection (http://www.ssa.gov/disabilityresearch/documents/FY2014%20Test%20Guidance%20for%20SSA%2020

13-09-30.pdf). By relying on the O*NET methodology, SSA's data can be collected through time-tested procedures developed by occupational analysis experts in the field of Industrial and Organizational Psychology. The BLS proposes to collect the information in the NCS through techniques and tools that do not meet current standards for collecting job analytic information.

Respectfully Submitted,

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