



INTERNATIONAL ASSOCIATION OF
REHABILITATION PROFESSIONALS

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May 22, 2014

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

RE: Public Comment of the Proposed Test of the Occupational Requirement Survey
Via Fax # 202-691-5111

Dear Ms. Kincaid:

The International Association of Rehabilitation Professionals (IARP) is a professional organization founded in 1981 to promote the betterment of people with disabilities and professionals who serve them. IARP has over 2,600 members and represents more than 60% of the current 1,200+ Social Security Vocational Experts under contract with the Social Security Administration. IARP is the only professional organization with a section focused specifically on Social Security Vocational Experts.

In Fiscal Year 2013, SSA held approximately 690,000 disability hearings and Vocational Experts provided testimony in approximately 570,000 of these. Vocational Experts provide evidence at hearings before an administrative law judge on applicant's ability to perform work in the labor market and currently rely on the Dictionary of Occupational Titles. Social Security Vocational Experts will be one of the primary users of the new Occupational Information System.

IARP has been actively involved in the efforts by the Social Security Administration to develop a new Occupational Information System and our members will be a major stakeholder and user of the new system. We would like to raise some questions, and provide comments and recommendations on the new data collection areas, the practical utility of the data, and the likely quality of the data.

The following are comments on the new Data Collection Elements; IARP comments are in italics:



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(1) "Time to proficiency,"

- a. Minimum education required? If no minimum, must workers be able to read and write?
- b. Prior work experience required? How much?
- c. Post-employment training (OJT, mentoring, etc.) required? Type and how much?
- d. Professional certification, state or industry license, other pre-employment training required? Type and time to obtain?

This data element is frequently used during disability hearings to rule out particular occupations as a result of a claimants limited education (less than high school) or training, inability to speak/communicate in English and limitations in performing in traditional academic settings (as a result of learning disabilities, intellectual disabilities or difficulties with concentration). It would be important to understand not only must the worker read and write but at what level—i.e.: recognize numbers/letters, write short sentences, read narrative instructions, understand safety signs etc. The issue of education required vs. preferred would also be important to be clear about.

(2) Physical Demand characteristics/factors of occupations, measured in such a way to support SSA disability determination needs, comparable to measures in Appendix C of the Selected Characteristics of Occupations (SCO).

It appears that the survey data elements are consistent with the physical demand factors from the DOT and SCO. However, several of the factors could use some clarification based on the type of limitations typically discussed in hearings. IARP is pleased with the clarifications and data elements included in this section (in particular the additional of manipulation tasks with one hand vs. bimanual) and would make the following additional comments:

Standing and walking:

Standing and walking are distinct functions, and although relational, there are occupations where one will perform prolonged standing such as would occur for a cashier or machine tender/operator and very little walking is required. Some individuals with physical limitations can move around, e.g., walk for long periods of time, but cannot stand in one position. We would recommend asking questions specific to each factor.

Depth Perception:

We would also recommend 'depth perception' be included under Hearing and Visual Requirements. This is an important requirement for jobs such as driving and frequently is a concern with loss of vision in one eye.



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Reaching:

Data should be collected at three body levels - above shoulder, waist to chest height and below waist. For example, an assembler may be able to reach at bench height but not below the waist.

Lifting/Carrying:

The form uses the word 'Seldom' with two different definitions. The range from 1/3 to 2/3 of the time is a large range and frequently is an issue. We recommend this range be broken down into a least a 5 point range (i.e.: 2%-10%, 11%-26% etc.)

Bending at the Waist/Twisting:

Neither bending nor twisting are included in your list of factors. Bending at the waist is different than "Getting Low" (stooping, crouching, kneeling, and crawling). You have not addressed the use of the trunk for bending and twisting. These are very important factors in particular with the high number of claims involving back injuries.

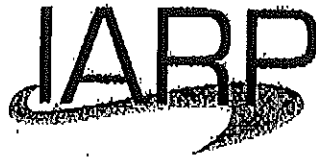
- (3) Environmental Conditions, measured in such a way to support SSA disability determination needs, comparable to measures in Appendix D of the SCO.

These factors are typically being addressed on claims where the limitations are related to allergies/asthma (exposure to fumes, gases, allergens, temp/humidity extremes), seizure disorders (exposure to unprotected heights, dangerous moving machinery) and neurologic conditions where exposure to sound and light may increase symptoms. The majority of these elements appear to be well defined but it would be helpful to have clarification on the "proximity to moving mechanical parts" factor—i.e.: what type of machinery; guarded assembly machinery, fork trucks, large construction equipment etc. so that the Vocational Expert can comment on the risk based on the disability.

- (4) Data elements that describe the mental and cognitive demands of work.

These factors are some of the most common areas that disability hearings focus on, and this is the area that the DOT offered limited descriptive data elements for. IARP is pleased that the BLS/SSA project has expanded these factors as 60% of all disability claims include an allegation of mental/cognitive limitation. The expansion of the task definitions of complexity, control, repetition and contact will be of great assistance in disability hearings, in particular the nature of the contacts for work related tasks.

It would appear based on the ORS Form 4 that the Cognitive Element lexicon comes from the NCS and is being superimposed onto the ORS. This lexicon has no relation to the Social Security Residual Mental Functional Capacity Questionnaire which is the



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foundation for much of the questioning in Social Security Hearings. The language and factors measured should be consistent with factors typically explored in SS disability hearings. Is there literature/research that supports this group of cognitive elements and can these elements be cross walked or mapped to standardized psychometric testing instruments?

Other general comment/feedback concerns regard the expansion of the NCS survey to include data elements for the SSA OIS are:

Data Collection and Data Quality:

We remain concerned with the point of contact and lack of direct observation of the occupation being surveyed. We understand that the field economists are collecting data directly from businesses through their human resources and management staff as they do when collecting data for the NCS. However, there is neither clear provision for direct observation of the work being performed nor interaction with direct supervisors or workers whom have more intimate knowledge of the requirements of the work, especially the physical and cognitive demands of the occupations.

Although HR personnel are the appropriate point of contact when gathering information on wages and benefits for the NCS, they do not always understand or know the real physical demands of many jobs the way the worker or the direct supervisor does.

Per the Phase 3 Summary Report, the field economists found that when they were "able to observe the job in action or the work environment, they were better able to apply professional judgment when coding the elements. The Phase 3 Summary Report also acknowledges (page 18) that some respondents knew less about the job, and therefore, more professional judgment was required of the field economist. As such, there could be issues with the quality of the data being collected. We would suggested to BLS staff a more integrated approach where they do field job analyses, including observations of the occupations performed and interview with direct supervisors for some of the occupations.

With regard to the collection tools tested in Phase 3, we would recommend use of the Single Quote tool to capture information on one occupation at a time. The Multiple Quote tool would be the least favored as there would be significant question as to whether there was blending of jobs when eliciting answers by element for all selected jobs.

As we have commented on in the past, it is important to collect not only duration of an activity, but also frequency, e.g. an activity that is done for 15 minutes, but twice per hour.



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Interview Duration:

The interview period for each occupation remains significantly low when considering the data being gathered on multiple occupations. Although the Phase 3 Summary Report indicated that it took on average 18 minutes to gather SVP and leveling data and 33 minutes to gather Physical Demands and Environmental Conditions data per establishment contact, there is no indication as to the number of occupations per establishment included in the average time. As we understand that four to eight occupations are being surveyed per establishment, this could mean as little as 4.125 to 8.25 minutes would be spent on the physical demands for each occupation. Based on our experience conducting field job analyses, this is a very limited amount of time to gain a clear understanding of the demands of an occupation given the number of data elements under Physical Demands and Environmental Conditions.

Connection between the Work Activity and the person:

It remains important to look at both the person-side (characteristics) and the work-side (activities) of occupations, employing a content model that addresses both. We refer staff back to the 2009 paper 'What is a Content Model' from the Occupational Information Disability Advisory Panel as this is a comprehensive look what is needed to meet SSA's needs for a scientifically sound, legally defensible, usable occupational information system.

We note that no Industrial Organizational Psychologists are in the Social Security nor the NCS work groups. We view this as a deficiency, as IO Psychologists can bring great insight and clarity on the issue of occupational requirements.

IARP is pleased with the scope of the data elements being collected as part of the ORS survey processes and these elements have practical utility in the disability adjudication process. IARP has been active in working with SSA on improving the efficiency of the current adjudication system and welcomes the opportunity to dialog, comment and work with BLS and SSA on this necessary and valuable project.

Thank you and we look forward to continuing to work with you.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Lynne Tracy'.

Lynne Tracy MA, CRC
IARP President

A handwritten signature in cursive script, appearing to read 'Amy Vereillo'.

Amy Vereillo ScD, CRC, LRC
IARP-SSVE Chair