

Office of Information and Regulatory Affairs
ATTN: OMB Desk Officer for DOL-BLS
Office of Management and Budget, Room 10235
725 17th Street, NW
Washington, DC 20503

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RE: OMB ICR Reference Number: 201403-1220-002
Response to Comment Request for Occupational Requirements Survey (ORS)

Thank you for the opportunity to provide further comments on the Occupational Requirements Survey (ORS) collection request by the Bureau of Labor Statistics. During the past five years, I have been engaged as a volunteer on behalf of APTA and IARP to provide constructive feedback on SSA's initiative to replace the Dictionary of Occupational Titles (DOT) with a more relevant and updated occupational demands taxonomy. My company, WorkAbility Network, has already submitted extensive constructive feedback that was intended to improve the taxonomy approach for factors and scaling on ORS Form 4 for the occupational survey. I have also contributed to the public commentary by APTA and had the opportunity to discuss the ORS survey approach with many ergonomic and vocational rehabilitation professionals.

A common concern that I share with many of my occupational health colleagues about the ORS data collection process is a serious concerns about validity (usefulness and accuracy) of data gathered in this limited survey collection, given the design plan to:

- Exclude several very useful DOT factors that have related tests of worker abilities (manual dexterity, finger dexterity, general education development).
- Rely heavily on survey reporting from company officials that may not be the best source for information on occupational demands (There is no plan to statistically validate the data accuracy of this brief survey with measurement, observation and interviews with the actual job supervisor or lead workers).
- Have the survey administered by economists that don't have formal training or expertise in job analyses (Functional job analysis was the foundation of DOT).

This ORS collection process has broad reaching implications that go far beyond SSA's interest in fairness to justify adjudication decisions about disability claims. Our country needs a better occupational demands taxonomy to prevent injuries, reduce health costs, prevent needless work disability, and make better decisions during job placement and career planning. This initiative is relevant to how my company delivers comprehensive range of fitness screening, ergonomic consultation and disability evaluation services to:

- determine worker fitness-for-duty,
- facilitate worker assignment to suitable job tasks,
- promote job modification improvements,
- identify realistic career options and rehabilitation needs for consumers who are disabled, or
- justify eligibility determination for vocational rehab services or disability benefits

I was pleased to note some improvements in the latest version of “ORS Form 4 PPD-4G final 6-10-14,” but still see several opportunities for improvement:

1. JOB DETAILS:

- **Coding: The NAICS Industry Classification for the establishment should be captured along with the O*NET-SOC Code**
- **Hours/Shift: I believe that it would be really important for the survey to ask about the usual (median), minimum and maximum scheduled shift lengths in total hours for workers in the job. This has important implications for job suitability determinations. For example, a worker with some limitations in standing may be capable of performing a 4 hour shift that requires constant standing, but not be able to perform a longer shift duration that requires constant standing.**
- **Hours/Week: To better understand how much time worker spend in a given occupation, it would also be helpful to know the usual (median), minimum and maximum number of hours worked per week by job incumbents in the occupation.** This information should be readily available from payroll reporting.

2. COGNITIVE ELEMENTS:

- **Scaling Approach: I like that a 5 level aptitude scales for cognitive elements is now to be used for all cognitive elements.**
- **Scaling Method for two elements: The scale used for frequency is not adequate for “4. How often does the occupation verbally interact (work related) with regular contacts?” and “6. How often does the occupation verbally interact (work-related) with people other than regular contacts?” This frequency scale is not useful to capture the level of exposure the these dimensions during the work shift. It would make more sense to capture the duration in hours per shift, similar to the approach used for physical demands and environmental conditions. In some respects, these questions seem redundant with a later function listed under physical demands “Communicating verbally”.**
- **Missing important cognitive dimensions: Task Complexity is not specific enough to adequately address the occupational impact of various learning disabilities. It is recommended that this dimension be supplemented by inclusion of at least three of the key cognitive elements describing complexity that have well-established precedent with aptitude levels described in the DOT. Minimal adaptation of the description levels would be needed to include the DOT factors for Reasoning, Math and Language under “Chapter 7: General Educational Development of US Department of Labor’s Revised Handbook for Analyzing Jobs.**

3. PHYSICAL DEMANDS:

- **Operational Definitions: It is recommended that BLS work with the professional associations to establish and communicate operational definitions for all the factors represented.**
- **Duration Scaling: I was pleased to receive clarification that duration on the physical factor would be measured in total hours of exposure time during the day, and that data would be collected by the work schedule of the occupation and not capped at 8 hours.** This has important implications for job placement for persons with physical disabilities, because some occupations have factor exposures for shorter shifts and some have a longer shift exposures that last more than 8 hours per day. For example, it is as lot harder to sit in a constrained seated posture in a truck for up to 11 hours per day than to sit in an office chair for 8-hours per day with the flexibility to move about.
- **Sitting/Standing or Walking Scaling:**
 - i. **Standing/Walking: Capturing only the total time per shift is not an adequate measure to evaluation the impact of disabilities that affect mobility.** It is therefore recommended that one new factor "Ambulation Agility" be added under this section that can be related more directly to standardized tests for balance and agility that rate the ability more like an aptitude. This is relevant to fall risk on level ground. The previous DOT contained a "Balancing" factor that was poorly characterized using the DOT frequency scale. Scale levels for Ambulation Agility could be more functionally described in a scale with the following dimensions:
 - None: Not present
 - Very low: Job functions may be performed with very slow ambulation speed (e.g. < 2 MPH)
 - Low: Job functions may be performed at below normal ambulation speed (2 to < 3 MPH).
 - Medium: Job functions must be normal ambulation speed (3 to < 4 MPH).
 - High: Job functions may require a fast walk or jog (4 to < 6 MPH).
 - Exceptional: Job functions require running (6 MPH or faster).
 - ii. **Sitting vs. Standing/Walking at will: Yes/No does not seem to be an adequate scale to capture this demand factor.** It would make more sense to capture total duration in hours per shift that the worker has flexibility to alternate between sit and standing (same scaling as for sitting or standing).

- **Lifting/Carrying:** I like the general approach to asking about categories of exposure based on definitions of frequency; however, putting a time range such as 1/3 to 2/3 of the time creates confusion when shift duration is so widely variable. A better approach would be to operationally define the categories based on repetition and time duration, similar to what is done for the ACGIH Threshold Limit Value for Lifting. I don't like the way that frequency definitions such as "Seldom" are referenced to an 8-hour day because work shifts are highly variable. Asking about the average based on repetition ranges (lifts per hour) that are combined with total duration in time would make more sense. For example, it may be more appropriate to define SELDOM as up to 0.5 hours per shift, OCCASIONAL as 0.5 to 2 hours per shift, FREQUENT as 3-5 hours per shift, CONSTANT as 6-8 hours per shift and EXTENDED TIME as > 8 hours per shift to better characterize how work is performed during shorter or longer shifts. The ACGIH represents categories of exposure for lift/carry tasks during a work shift lasting more than 2 hours as < 12 repetitions per hour, 12-30 repetitions per hour, 31-360 repetitions per hour, and > 360 repetitions per hour. See reference: American Conference of Governmental Industrial Hygienists (ACGIH) 2004. Threshold Limit Values for Lifting.
- **Manipulation:** The level of skill required for manipulation has been excluded from this survey. This was previously captured with an aptitude rating scale for finger dexterity and manual dexterity and represents a critical dimension for job placement. For example, a person may manipulate for 8-hours in a sheltered workshop, yet never have the level of skill and dexterity to perform a competitive job in a production setting. There are a number a well-established standardized tests to measure finger and manual dexterity; therefore, it is recommended that Gross and fine dexterity measures of duration in hours per shift be supplemented with a rating scale. For example, the scale levels for finger or manual dexterity with one or both hands could be functionally described in a scale with the following dimensions:

 - None: Not present
 - Very low: Job functions may be performed at very slow rate of manipulation speed.
 - Low: Job functions may be performed at a slow (below normal) rate of manipulation speed.
 - Medium: Job functions must be normal rate of manipulation speed.
 - High: Job functions must be done at a fast (above normal) rate of manipulation speed.
 - Exceptional: Job functions must be performed with an exceptional rate of manipulation or skill.

- **Communication Requirements:** The Yes/No scaling used for Hearing and Vision should be modified to reflect an aptitude style of skill. I included examples in my earlier commentary.
4. ENVIRONMENTAL CONDITIONS: **It makes no sense that the ORS survey contains a number of non-specific environmental factors that cannot be related directly to a person's abilities and limitations.** For example, I don't believe that information about general exposure to toxic/caustic chemicals is helpful for determining whether claimants with respiratory impairments or skin conditions can perform a job. This entire section should be reviewed with input from occupational health professionals and agencies to eliminate and add factors that are more relevant to worker-job match decisions. For example, it would be better to ask of respiratory protection or skin protection is recommended for workers who perform the occupation. Missing are some key environmental factors such as close contact with persons with infectious disease pathogens.

Finally, I recommend that more opportunity be provided for professional discussion in a forum that engages all stakeholders. The development of ORS is a vital initiative that should not be dictated solely by the specific interests and funding by Social Security Administration. It deserves additional funding and there should be more opportunity for discussion with occupational health professionals who evaluate disability. There should be more collaboration on design of the ORS data collection with researchers from other agencies such as the National Institute of Occupational Safety and Health (NIOSH).

I look forward to contributing to future discussions as the SSA and BLS move forward to address these complex issues. I share the sentiment of other colleagues that we want this to be **done right**. As a taxpayer and occupational health expert, I am well aware to the fiscal crisis with Social Security as well as the personal and society cost of disability. The taxonomy language used to describe and classify occupation demands is vital to the health of our US economy and deserves adequate funding. It is vital that we capture useful and accurate data on occupational demands that may be directly related to more objective evaluations of worker abilities and limitations. A better taxonomy will identify more options for people with disabilities to become contributing workers in our society.

If you have any questions about this commentary, please feel free to follow-up with me by phone (513-7720-1026) or by email (rick@workability.us).

Sincerely,



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