

## Harris-Kojetin, Brian

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**From:** Emily Veith <eveith@expertvoc.com>  
**Sent:** Tuesday, August 19, 2014 12:43 PM  
**To:** FN-OMB-OIRA-Submission  
**Subject:** occupational requirements survey comment

To whom it may concern,

I have reviewed the occupational requirements survey project. While I commend the efforts you have made to update occupational information, as the Dictionary of Occupational Titles is certainly out of date, I have some concerns about the work.

Having done labor market surveys and employer sampling as a vocational rehabilitation counselor, I understand how hard it is to elicit accurate vocational information from employers. I have learned that there is no substitute for going onsite to observe a job. Much of this data collection so far has been telephonic. However, most people who work in human resources, recruiting, etc. have never observed the jobs for which they hire and do not have accurate information about what is required. Some will read information off of job descriptions that are 10 years or more old. Again, going onsite is the gold standard for accurately assessing the physical demands of jobs. I do not see that this project is focused on actually observing the work being performed.

Furthermore, these evaluations should be done by professionals skilled at assessing jobs. Vocational rehabilitation counselors are trained to conduct job analyses. Physical therapists/occupational therapists or ergonomists are other options. These are the professionals necessary to do this important work, as they can ask the right questions, take measurements, and are trained in the language of conducting job analyses. I do not see that these trained professionals are involved in your project.

I suggest you take these suggestions into account. I also recommend partnering with a professional organization, which has members with over 100s of years of combined experience at understanding and assessing the world of work, such as the International Association of Rehabilitation Professionals. Not only could they provide input as to how best to collect the data, but their members are spread across the US and could provide an easily accessible pool of professionals to assist with this important project.

I appreciate your consideration of these suggestions.

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