



April 20, 2015

Nora Kincaid, BLS Clearance Officer
Division of Management Systems,
Bureau of Labor Statistics, Room 4080
2 Massachusetts Avenue NE.,
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Fax 202-691-5111

RE: BLS Proposed collection, comment request of the Occupational Requirements Survey

Dear Ms. Kincaid,

Thank you for the opportunity to provide comments and suggestions to enhance the quality, utility, and clarity of the information to be collected in the Occupational Requirements Survey (ORS).

This is such a complex initiative that most employers and occupational health professionals may not fully grasp its importance and how standardization of taxonomy language and occupational characteristics will benefit the design of fitness-for-duty exams and return to work management of workers with disabilities. It is great to see this project continuing to move forward.

First, I want to express my appreciation for responsiveness by BLS to informal feedback that I have provided on several occasions over the past year. The draft Occupational Requirements Survey (ORS) collection forms and the supporting statement documents for the ORS PRA clearance package contain a lot of information, but this packet does not fully reveal the level of other information developed by BLS to support this complex initiative. For example, I really benefited from having the opportunity to review the draft of your procedures manual that further describes operating definitions, instructions, and coding examples for factors being assessed in the ORS Survey.

The bulk of my comments for this last round of comments will emphasize how the design of the 4PPD_Form could be further improved to capture data in a manner that is more relevant to occupational health professionals such as physical therapists who make recommendations for worker restrictions that are relevant to worker-job match demands.

COGNITIVE DEMANDS: The ORS does not do an adequate job of capturing job demands that relate to language/communication skills and mathematical skills that contribute to the rating of overall task complexity.

WORK SCHEDULE: It is common for occupational health professionals to place limits on the total hours for the work shift or total hours per week for a worker that is recovering from an injury or illness. Field Economists seem to be collecting the typical and permanent schedule for the occupation on a different Establishment Data collection form, including number of daily hours, weekly hours and annual weeks. It would be relevant to know the usual minimum, median, and maximum and maximums for occupations

in terms of daily hours, weekly hours and annual weeks. The current method seems to only represent the typical or median work schedule. This seems to be more of an issue with the NCS collection process than the ORS survey per se.

TRAVEL REQUIREMENTS: There should be a survey element that asks more specifically about the need for overnight or out-of-town travel, with Y/N being the responses. This situation results in higher physical demands to be imposed on occupations that are traditionally classified as SEDENTARY occupations.

SIT/STAND/WALK FACTORS: I don't have a problem with combining standing and walking time in one factor, but believe that this information should additionally include a further measure of agility that has levels that are functionally described in a more similar manner to the approach for hearing requirements.

LIFTING/CARRYING FACTORS:

- The definition for Seldom (up to 2% of the time) only totals up to about 9 minutes over an 8-hour work shift. I have seen many definitions for Seldom applied to the duration of tasks; however, this range seems rather low. The most common definition on job analysis reports is up to 5% of the time or less than a half hour during the shift. I have seen the definition for seldom range up to 10% on the job demands form used by the State of Washington Labor & Industries.
- Including a definition for SELDOM seems to have more relevance to time-based factors such as sitting or standing. Therefore, I am not convinced that collecting data about how much weight is lifted or carried on a seldom basis adds further value to this data collection process.
- It would be more important to know the maximum load that must be lifted or carried than to make a subtle distinction between SELDOM and OCCASIONAL. **The proposed number of data elements could be reduced from 5 to 3 factors by modifying Lifting/Carrying factors as follows:**
 - Maximum load handled during the shift
 - Average load handled 1/3 up to 2/3 of the shift
 - Average weight handled 2/3 or more of the shift
- Alternatively, another well-accepted way to operationally-define the frequency ranges for lifting and carrying tasks would be to adopt the definitions by the American Conference of Government and Industrial Hygienists that classify threshold limits for lifting tasks based on repetition ranges per hour, e.g.:
 - Occasional: 1-12 repetitions per hour or once every 5-minutes
 - Frequent: 13-30 repetitions per hour
 - Constant: More than 30 repetitions per hour

PUSHING/PULLING FACTORS: This entire section could be eliminated, because it appears to be a duplication of information that is already captured adequately by other factors in the Reaching/Manipulation section.

TIME DURATION for factors: The data form should implicitly clarify that the time captured is based on the occupation's work schedule. There are no examples in the manual for longer exposures to factors such as sitting to emphasize that there is no 8 hour limit on the captured data.

REACHING/MANIPULATION FACTORS:

- It is not necessary to include a separate factor for "At/Below Shoulder Reaching" as this type of physical circumstance is covered under other manipulation factors for gross and fine manipulation factors.

- A breakout of time using “one” versus “both” should be implemented to better assess the functional impact of unilateral impairments such upper extremity amputations on jobs that require overhead reaching, gross manipulation, fine manipulation and foot controls. This would resolve my disagreement with the current procedure in the manual to code One or Both based on the higher occupational physical demand rather than majority of the time. The field analyst is instructed to codes the element as “both” whenever there is a task that requires the use of both extremities, even when the majority of the tasks are completed with one. The field economist only codes “one” if the occupation tasks are typically completed using only one extremity.
- Eliminating the 6 data elements for Pushing/Pulling elements and the 2 data elements for At/Below Shoulder and adding a breakout of time for “one” versus “both” would lower the respondent burden by three data elements and provide better information to assess worker job-match. It eliminates confusion that results from having two different types of data elements for

CLIMBING RAMPS OR STEPS:

- It is more important to distinguish occupational demands that require CLIMBING OF STAIRS for job tasks than climbing of ramps since this implies situations that are not generally accessible by wheelchair or scooters.
- There would be no additional respondent burden for relabeling the data element “Work-related climbing” to “Climbing Stairs”

ENVIRONMENTAL CONDITIONS: Factors should be named and defined in a manner that are more relevant to safety program, medical surveillance, and common worker restrictions, e.g.:

- High noise exposure that requires hearing protection (rather than Noise Intensity Level)
- Handling of chemicals that require barrier protection
- Inhalation exposures the require respiratory protection
- Blood-borne pathogens

In summary, the ORS seems to more moving toward a more useful taxonomy for gathering physical demands; however, it doesn’t appear that an adequate amount of time is allocated for actual measurement and validation of physical demands with credible sources at the establishments. It is vital for field economists to have more time allocated for validation of the respondent’s survey by job observations and validation by actual job experts that supervise or perform the job. I don’t believe that most business owners or HR directors that usually respond on the NCS platform have enough day-to-day experience with physical nature of jobs to provide accurate responses about the physical demands. More research is needed to validate the accuracy of survey data with these typical NCS platform respondents compared to the functional job analysis approach with observation of work was used for the DOT.

If you have any questions about this feedback please feel free to contact me by phone 513-772-1026 or by email to rick@workability.us.

Sincerely,



Rick Wickstrom, PT, DPT, CPE, CMDS