



July 18, 2015

Office of Information and Regulatory Affairs
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RE: BLS sponsored information collection request (ICR) titled "Occupational Requirements Survey"

To Whom It May Concern,

Thank you for the opportunity to provide further comments with regard to the proposed "Occupational Requirements Survey. My feedback will emphasize further improvements needed to enhance the quality, utility, and clarity of information to be collected in the Occupational Requirements Survey (ORS).

The occupational requirement survey has an important purpose of collecting more relevant and information about the requirements of work in this economy. The ORS survey was initiated by BLS at the request of the Social Security Disability Insurance (SSDI) program to promote equitable and efficient operations; however, it is just as important to consider needs of other entities in the public and private sector. We need to make sure that this data collection is adequate to facilitate prevention of needless injury and disability claims, given the cost of disability to our society.

I have been following this initiative for a number of years and have provided testimony and written commentary as this project has continued to move forward. My greatest concern throughout this development of a new Occupational Information System to replace the Dictionary of Occupational Titles has been that the survey approach method and design of factors and related scaling has been unduly influenced by what SSDI officials have determined to be necessary for equitable and efficient its agency operations. While I like many of improvements included in this survey, I am concerned that not enough attention has been given to justify the ORS approach for each content element based on available evidence, user needs, and best practices to assess worker fitness-for-duty and accommodation options.

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 physical work restrictions that are relevant to worker-job match demands.

QUOTE DETAILS: I don't see the value of distinguishing between "Yes – requested" versus "Yes – offered" It would be more important to note the reason for not observing the job, given that not observing the job presents a potential threat to the validity of the data collected.

SVP: Under Job Tasks/Notes, Driving would be better labeled as “Operating Moving Vehicle(s)” and there should be a data element to stipulate what type of vehicle operating license or certification is required. Under minimum education, there should be a place to capture any specific languages required for conversation, reading or writing purposes. The SVP section does not do an adequate job of capturing job demands that relates to language/communication skills and mathematical skills that contribute to the rating of overall task complexity.

COGNITIVE ELEMENTS: There are many changes to the survey questions in this section. In general, I really like many of the improvements.

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 believe that “Sitting vs. Standing at Will” should not be presented as a Y/N variable but rather it should be captured by total number of hours during a usual shift. Y/N scaling implies that the entire job has to have this flexibility to get a yes response, whereas the more important consideration is whether the job has some flexibility to vary between sitting and standing postures.

AGILITY: Ambulation agility is a critical factor that is completely ignored in this survey. This should be treated in a similar manner as the functional check box approach used to describe hearing requirements, e.g. Ambulation Agility: Running Y/N, Walking over uneven ground, Walking on level ground Y/N.

LIFTING/CARRYING FACTORS:

- The definition for Seldom (up to 2% of the time) is not consistent with the general use of this term in industry. Up to 2% of the time only totals up to about 9 minutes over an 8-hour work shift. At a minimum, I would recommend that consideration be given to modifying this definition to “Up to 5% of the time”, which would still be less than 0.5 hours during the shift. This would be more consistent with how the term SELDOM is used in occupational health worker restriction forms. I have seen the definition for seldom range up to 10% on the job demands form used by the State of Washington Labor & Industries; however, that range is more of the exception. A simpler approach may be to eliminate “2% up to 1/3 of the time” and “Seldom (up to 2%)” elements altogether as these lifting ranges don’t add much value since the survey is already capturing “Most weight ever” for lifting/carrying demands. **This would reduce the proposed number of data elements for lifting/carrying 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 established 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.

CLIMBING RAMPS OR STEPS: It is not a good practice to combine stairs with ramps as ramps can be readily negotiated by a person with physical disability that requires use of a wheel chair, scooter or cart, whereas steps cannot be negotiated with these devices. The factor "Climbing Ramps or Stairs" should be changed to "Climbing Stairs" to differentiate between climbing that is done primarily with the legs versus climbing of ladders, ropes or scaffolds that requires use of the arms and legs. There would be no additional respondent burden for relabeling the data element "Work-related climbing" to "Climbing Stairs"

ENVIRONMENTAL CONDITIONS:

- I don't see the value of limiting Extreme Heat, Extreme Cold, Wetness and Humidity to only non-weather related conditions.
- It doesn't make sense that most of the OMB_ORF_Form_Gov_4PPD-4P_final.doc survey applies to only one occupation, yet the Environmental conditions section has a grid to record data for up to 8 selected occupations.
- I don't see how PPE generally applies to the condition "Proximity to Moving Mechanical Parts" This element is not named and defined in a manner that is specific enough or relevant to safety programs, medical surveillance, or common worker restrictions.
- What about exposure to sharp edges that requires gloves?
- What about exposure to eye injury risks that requires safety glasses?

In summary, the ORS seems to be progressing toward a more useful taxonomy for gathering occupational demands; however, it doesn't appear that there has been adequate justification for the elements included. Furthermore, the survey approach does not have an adequate amount of time and money budgeted for actual measurement and validation of physical demands with credible sources at the establishments. It is wrong to assume that a typical HR respondent will provide accurate information, without supporting validation of the survey by job observations and job experts that supervise and perform the occupation.

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