

**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

**APPENDIX F**

**Report of the  
User Needs and Relations Subcommittee**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

**User Needs and Relations Subcommittee**

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**September 1, 2009**

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# **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

## **Executive Summary**

The User Needs and Relations (UN&R) subcommittee, established by the Occupational Information Development Advisory Panel (OIDAP or Panel), has analyzed the information, communication, and applied research needs of the Panel and the Social Security Administration's (SSA's) Occupational Information System (OIS) project. The following report describes the UN&R subcommittee's analysis and findings, and it outlines recommendations for the Panel to consider in the areas of communication, applied research, and data elements for the content model other than those recommended in the other Panel subcommittee reports.

## **Introduction**

One of the objectives of SSA's OIS project is creating and maintaining a transparent development process that welcomes input from all interested parties. User input and communication is vital for SSA to develop a final product that meets its legal, programmatic, and technical requirements for valid and accurate data that are operationally usable. The Panel established the UN&R subcommittee to help the Panel advise SSA on ways to achieve this objective as follows:

- To obtain information regarding the concerns, advice, and input from the public, public- and private-sector stakeholders and experts, and SSA and non-SSA users of occupational information who are directly and indirectly involved in SSA's disability process.
- To communicate the Panel's mission and activities, as well as that of SSA's OIS project, to all interested parties within SSA and external to the agency.
- To review SSA's plans for conducting applied research to assess SSA user needs and program and operational effects of the OIS and to provide advice and recommendations on the applied research for Panel deliberation.

The following UN&R subcommittee report provides our analysis, methodology and findings, and our recommendations for the Panel's consideration regarding the information that the Panel and SSA need to obtain and communicate, as well as the applied research needed. We considered the information that is required

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for the OIS content model and classification system, and information and communication for the OIS project in general.

### **Methodology and Findings**

The UN&R subcommittee approached its task by analyzing: 1) the information that the Panel and SSA needs to obtain from users and others; 2) the communication needs and methods for the Panel and SSA; 3) the needs for applied research for the Panel and SSA; and, 4) data needs for SSA that are not already identified by the other Panel subcommittees. Gathering information differs from applied research in that applied research is activity that SSA initiates that follows a study design and protocol intended to address identified research question(s). Our analysis and recommendations fall into these categories:

- **Communication:** Analysis and recommendations to help SSA efficiently and effectively facilitate and manage communication relevant to OIS development between and among SSA, the Panel, and external individuals and professional organizations.
- **Applied Research:** Analysis and recommendations to help SSA conduct qualitative and quantitative studies or investigations to inform each stage of OIS project research and development.
- **Content Model:** Analysis and recommendations regarding additional data elements that are not identified by the other Panel subcommittees which SSA needs for disability adjudication and program evaluation purposes.

We considered the communication, applied research, and additional data needs that are relevant to the OIS content model and classification system, as well as those that we think would be helpful for the OIS project as a whole. As the project progresses, the needs of the Panel and SSA will change. We will monitor those needs and advise the Panel accordingly.

### **Analysis for Communication**

#### **A. Information from Users and Others**

Users and others can and do provide the Panel and SSA with critical information, advice, and ideas in the form of public comment and solicited and unsolicited

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input from private- and public-sector individuals and entities. One of the most important types of information needed for the OIS content model and classification system, as well as the project in general, is user input. Not surprisingly, the users are also one of the most critical sources and audiences for the project. We discuss SSA's user needs analysis (UNA) of SSA adjudicative, review, and program staff in the Analysis of Applied Research section below.

We define users broadly, as follows:

- Members of the general public who may avail themselves of SSA's disability programs, including prospective and current SSA disability claimants and beneficiaries.
- SSA and non-SSA professional users (individuals and professional organizations) of occupational information who are directly involved in SSA's disability process, such as SSA disability adjudicators and reviewers, vocational experts, and claimant representatives.
- Non-SSA professional users (individuals and professional organizations) of occupational information who are involved in disability assessment, rehabilitation, and job placement or those who are indirectly involved in SSA's disability process, including vocational rehabilitation counselors, occupational and physical therapists, and disability case managers.
- Public- and private-sector stakeholders and experts who use occupational information or who can inform the OIS project specific to disability, such as academics, researchers, or professionals in relevant specialty areas (e.g., medical experts, labor market data experts, industrial occupational psychologists, occupational software developers, etc.); State and Federal agencies (e.g., workers' compensation programs, National Institutes of Health, Bureau of Labor Statistics, etc.); and, private-sector disability insurance programs.

Other sources and audiences that are not necessarily users of occupational information have substantial input into the project. These would include SSA management, OIDAP members, as well as monitoring authorities that review SSA's programs and activities, such as the Social Security Advisory Board, the U.S. Office of Management and Budget, the U.S. Government Accountability Office, the U.S. and SSA Office of the Inspector General, the Senate Finance

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Committee, and the Congressional Ways and Means Subcommittee on Social Security.

### B. Public Comments

The SSA project staff already encourages public comment through the *Federal Register* notices it publishes before each Panel meeting. The notices announce the date and location of the upcoming meeting and invite the public to provide comments in writing to the Panel's designated federal officer (DFO) or to sign up to present comments in person or telephonically during Panel meetings. The public may submit written comments to the Panel's postal address or to its email address. To date, the public comments received in writing consist largely of inquiries about the Panel meetings or agendas, requests for information distributed at Panel meetings, and general disability program questions unrelated to the OIS project or the activities or mission of the Panel. The Panel's DFO responds to the written comments and requests. A number of individuals and representatives of interested professional organizations have provided public comments during the Panel meetings.

### C. Solicited and Unsolicited Input

In addition to relying on the formal public comment process, SSA and the Panel has solicited input from users and others since the inception of the OISAP to address specific content model or classification issues by inviting:

- Individual professionals or representatives of professional organizations to present information or perspectives regarding the OIS content model or classification system at a public face-to-face Panel meeting.
- Subject-matter experts to present to Panel members during a closed information gathering session.<sup>1</sup>
- Subject matter experts to attend roundtables held by Panel subcommittees, and asking for their advice or input regarding literature, studies, and specified content model issues.<sup>2</sup>

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<sup>1</sup> Information presented by either Panel members or SSA staff at closed information gathering meetings for Panel members can be found in the Taxonomy subcommittee report. See presentations on taxonomy and classification by Mark Wilson and Robert J. Harvey, respectively.

<sup>2</sup> Subject matter expert input provided at Panel subcommittee roundtables are discussed in relevant subcommittee reports. See reports of the Work Experience Analysis and the Mental-Cognitive Demands subcommittees.

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- Interested professional organizations to provide written comments to the Panel's Interim Chair regarding the type of occupational information that SSA should consider including in its OIS.

In addition, the Panel has received a variety of input from other interested external professional organizations. Several entities canvassed their membership for ideas and opinions regarding the type of occupational information SSA should collect and related concerns. The results of all solicited and unsolicited written input and the names of the professional organizations that submitted them are cited in the Summary of External Users' Input section.

### **D. Intra- and Interagency Coordination**

We note that SSA project staff has established an intra-agency workgroup to bring SSA's expertise to bear on the development of the OIS. Chaired by the OIS project director, the OIS Development Workgroup is comprised of representatives of key SSA offices<sup>3</sup> that are stakeholders in the use and development of occupational information in SSA's disability adjudication process. The OIS Development Workgroup meets regularly, and the members provide advice and agency-wide perspective to the Panel and the project staff. Workgroup members have presented extensive background at public face-to-face Panel meetings in 2009. They have also participated in a number of Panel and OIS project activities, such as Panel subcommittee roundtables, Panel member visits to State Disability Determination Services sites and Office of Disability Adjudication and Review hearing offices, and SSA user needs analyses. The OIS Development Workgroup will continue to meet throughout the life of the project.

Also, SSA's project staff is coordinating its activities with staff from the National Institutes of Health that has an interagency agreement with SSA's Office of Disability Programs to investigate effective ways to obtain more useful functional information from claimants and their medical providers. SSA has also met with representatives of the Department of Labor, Employment and Training Administration.

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<sup>3</sup> Other SSA offices represented on the OIS Development Workgroup include the Office of Operations, Office of Disability Determinations; the Office of Disability Adjudication and Review, Office of the Chief Administrative Law Judge and the Office of Appellate Operations; the Office of Quality Performance; and the Office of Retirement and Disability Policy, Office of Disability Programs and the Office of Medical and Vocational Expertise.

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The UN&R subcommittee recognizes that there are other Federal and State agencies that use occupational information. We will seek their counsel during this project. Examples of such agencies include, but are not limited to, the Department of Labor, Bureau of Labor Statistics, Employment and Training Administration, Office of Workers' Compensation Programs, the US Census Bureau, the US Citizenship and Immigration Services, and state vocational rehabilitation and workers' compensation programs. Subcommittee members may meet with key agency officials as needed to discuss the OIS project and how the other agency could advise SSA or inform the project. The subcommittee will explore areas in which SSA and other agencies may collaborate on research. Federal and State agency representatives may also be invited to address the Panel at future meetings as needed.

### **E. Summary of External Users' Input**

The Panel was privileged to receive a variety of comments and suggestions from the following interested external professional organizations:

- American Board of Vocational Experts
- American Occupational Therapy Association
- American Physical Therapy Association
- International Association of Rehabilitation Professionals
- National Association of Disability Examiners
- National Association of Disability Representatives
- National Council of Disability Determination Directors
- National Organization of Social Security Claimants' Representatives

External input has been valuable to the Panel in developing its recommendations for the OIS content model and classification, and the comments will serve the Panel and SSA as the work to develop the OIS begins. The comments also provide the Panel with additional insight regarding the perspectives of a variety of users in the disability evaluation and forensic community. Below, we have summarized the comments by topic and provided our responses. Copies of the written communication that the Panel received from these organizations are included in Sub-Appendix A.

Finally, the external input also indicates the need for the Panel and SSA to clearly express the mission of the Panel and the goals of SSA's OIS project, including how SSA's adjudicative needs may differ from other forensic needs and how the OIS research and development phase of the OIS project is focused on data development only rather than the application of those data.

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Specifically, we have identified eight themes that arise from external users:

1. Update the DOT
  - Update jobs
  - Maintain the definitions and measures from the Revised Handbook for Analyzing Jobs

The fact that the last substantial revision of the DOT occurred in 1977 is not the extent of the limitations of the DOT. For example, the DOT does not contain information regarding the mental-cognitive requirements of work, nor is it a straightforward matter to build these new work demands (and other types of occupational information the users have identified) into the DOT's structure. While the DOT was a remarkable achievement for its time, advances in technology, psychometrics, job analysis, and taxonomic theory, as well as changes in the US labor market render the DOT's foundation problematic as a platform for an occupational information system suited to SSA's disability program needs. Merely updating the worker traits and occupations in the DOT will not serve SSA and its disability claimants for the long term. The National Research Council, for example, found as long ago as 1980 that the definitions and measures of the DOT's worker traits and work demands, including variables related to skills, pose psychometric concerns:

Concern about the validity of the DOT's ratings of worker functions and worker traits arise from a number of reasons...the factors represented by this set of variables is vague and ambiguously defined. It is not readily apparent what the variables are intended to measure...Scales that more or less adequately reflected the state of the art of vocational trait measurement at mid-century are now outdated.<sup>4</sup>

SSA has charged the Panel with providing advice "on creating an occupational system tailored specifically for SSA's disability programs."<sup>5</sup> As such, the Panel may also recommend aspects of the DOT (and O\*NET) that would be valuable for SSA to carry forward in its development of an OIS. For example, the DOT's classification system and the O\*NET-SOC (Standard Occupational Classification) are obvious frameworks from which SSA can begin to develop a classification system for the OIS.

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<sup>4</sup> Miller, A.R., Treiman, D.J., Cain, P.S., Roos, P.A. (Eds.) (1980). Work, jobs, and occupations: A critical review of the Dictionary of Occupational Titles, pp. 164-168.

<sup>5</sup> Occupational Information Development Advisory Panel Charter, December 9, 2008.

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### 2. Data vs. Their Application

- Suggestions regarding software and presentation, usability of the data
- Concerns raised regarding prospects of automated decision-making
- Suggestions regarding SSA adjudicative policy at Steps 4 & 5

We note a distinction in the OIS project between the occupational data SSA needs to develop and obtain versus the application or use of that data in the disability adjudication process and its implications for policy. Presently, SSA is working on the research and development (R&D) phase of the OIS project to identify and collect data needed for the OIS. The Panel is charged with advising SSA throughout the R&D phase of the project, and therefore, deliberation and recommendations for policy changes are considered outside of the Panel's charter. However, as the OIS project progresses (instrument development and testing, basic and applied research, and occupational data collection), the Panel will have an opportunity to review SSA's work, including the results of its basic and applied studies and data analyses. Having reviewed empirical results, the Panel will be positioned to consider ideas for further applied and basic research that could inform OIS development and various policy and process issues. The plans that SSA presented at the inaugural Panel meeting indicate that SSA intends to conduct studies using the new occupational data gathered for the OIS to inform any subsequent policy development that the agency believes are necessary. Social Security medical-vocational policy and Grid rules are based on a) the Social Security Act as interpreted in the Code of Federal Regulations; and, b) the technology, research, and information available at the time that the rules were published in 1978 regarding the vocational factors and their interplay with physical and mental function resulting from severe medically determinable impairments. The R&D related to the OIS project would provide SSA with the opportunity to update the medical-vocational evaluation policy and process as needed using the new technology and research that have emerged since the rules were published, including the results of the OIS R&D. SSA proposes future stages of the OIS project intended to integrate the OIS data into its disability systems and investigate usability issues.

It is important to note that the SSA project staff is capturing all policy-related suggestions and concerns submitted by external and SSA users for future studies and policy development consideration by the Office of Retirement and Disability Policy, as well as the OIS Development Workgroup. We also understand that SSA has plans to conduct studies regarding effects of

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introducing new OIS data to SSA's disability adjudication process in stages as the data are collected and validated.

3. Classification: U.S. Labor Market Connection
  - Need for crosswalks to other Federal occupational classifications
  - Need for information to establish significant numbers of jobs in the economy
  - Concerns regarding the number and type of occupations throughout the U.S. that the OIS will reflect

The OIS must have cross-walks to other Federal occupational classifications, such as the North American Industry Classification System. Also, to facilitate SSA's ability to derive some estimate of "significant numbers of jobs" (i.e., the existence and the incidence of work throughout the economy), the SSA will need to establish a linkage to the SOC. In addition, we think that it is possible for SSA project staff to work with the Bureau of Labor Statistics to investigate how its occupational and employment surveys may assist SSA. Other Federal agencies conduct national surveys for a variety of purposes that capture employment and occupational data. These sources may also prove to be viable avenues for identifying occupations and estimates of how many exist. However, SSA will need to consider the issues of data comparability and their linkage to the OIS or the SOC.

We understand the concern that users have raised regarding the number and type of occupations to be included in the OIS. SSA project staff is now initiating a study of previously adjudicated claims for adult disability benefits to identify, among other information, the types of occupations (DOT titles) that are reflected most frequently in claimants' work histories. Those occupations would be the most logical to target first in job analyses planned to test OIS instruments. However, we agree that the OIS should reflect the full range of work in the economy because SSA needs the information at Step 4 of its sequential evaluation process. Also, information regarding the full range of work existing in the economy may be useful for SSA's return-to-work initiatives.

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4. Content Model: Worker Traits and Work Demands
  - Recommendations of elements better suited to vocational rehabilitation and job placement than SSA disability adjudication (e.g., motivation, interests, leadership, appearance, etc.)
  - Recommended worker traits and work demands
  - Suggestion to use current National Institute for Occupational Safety and Health (NIOSH) standards for relevant measures (e.g., boundaries for weights lifted associated with light, medium, and heavy strength categories)
  - Call for deconstructed worker traits to enable more focused assessment of individual attributes (e.g., separate position (sitting, standing) from lifting, carrying, walking as now combined in DOT sedentary and light “strength” definitions)
  - Concerns regarding ability to establish objective measures of “non-exertional” physical and mental-cognitive elements (worker traits and work demands)

While SSA disability adjudication and vocational rehabilitation share many similar needs regarding occupational information, some fundamental differences exist in how the information is used and why. SSA requires occupational information to enable an assessment of an individual’s residual functional capacity resulting from a severe medically determinable impairment to determine his or her ability to do past work or other work for the period involved in the claim, without medical, therapeutic, or educational intervention. Vocational rehabilitation entails assessing an individual’s current physical or mental-cognitive function, as well as developing an intervention plan (rehabilitation therapy (occupational, physical, or speech and language pathology therapy), placement assistance, skills development and training for job placement, individual accommodations, etc.). Therefore, while professionals in the vocational rehabilitation fields can use the same worker traits and work demand elements in their assessments that SSA disability adjudicators need, vocational rehabilitation professionals can make use of a variety of traits and demands that SSA cannot consider. We have shared the Content Model suggestions submitted by external professional organizations with SSA project staff and with the other Panel subcommittees for their consideration (see copies of communication in Sub-Appendix A).

One of the goals of the OIS content model is to reduce the inference between the worker-side and the work-side to provide for more objective medical-vocational

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assessments of the ability to do work. By inference, we mean the degree to which the measures for one side (person or work) can be related to the other. We understand that the SSA project staff plans to test the constructs and measures selected for the OIS content model through its instrument development and testing process. In testing the prototype person-side and work-side instruments, SSA will learn how well the worker traits and work demands can be defined and measured, including how well the work-side measures may be linked or associated with the person-side measures. SSA will need to study other methods, such as job component validation, to determine how to obtain reliable occupational information about work demands and worker traits that cannot be directly or easily observed.

5. Data Suggestions for Work History and Transferability Assessments
  - Suggestions for revisions regarding the DOT's Specific Vocational Preparation (SVP)
  - Call to include additional educational levels and vocational training to the OIS to assess vocational preparation
  - Call for occupational prerequisite information, such as the type and length of experience needed for occupations; and
  - Range of opinions regarding whether to retain a category for "unskilled" work or to represent that work as "skilled" (e.g., low skilled)

The OIS project offers SSA an opportunity to conduct research and test methods to obtain the type of data that would enable adjudicators to conduct work history and transferability assessments (e.g., identifying ways to determine the complexity level of an occupation, the average time-to-proficiency for minimal level of satisfactory performance, work activities, etc.). This type of information has historically been addressed in existing literature through a proxy for skills, Specific Vocational Preparation.

6. Program Effects
  - Concerns raised regarding the effects of using new occupational information on the claim outcomes
  - Call for the Panel to issue a "beneficiary impact statement"

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We agree that the effects of the use of the new OIS must be studied before it is introduced into SSA's disability process. We understand that SSA has plans to conduct studies of the definitions and measures developed for the content model, including the effects of using revised physical and mental worker traits to assess residual functional capacity resulting from a severe medically determinable impairment. Also, once SSA has collected new occupational information, it will be able to conduct studies on the effects of introducing new OIS data into the disability adjudication process.

### 7. Accommodations versus Work Options

- Suggestions to obtain information regarding a sit-stand option for occupations
- Confusion regarding occupational information regarding options for altering work activities

We differentiate between accommodations and work options. Accommodations involve retooling of work space or interventions that an employer may provide for an individual worker for any reason, but most typically the accommodation is made to enable an individual with a physical or mental-cognitive impairment to perform a work activity(ies). We agree that the OIS should not include accommodation information as SSA cannot use this data for disability adjudication. However, we think that it would be helpful for SSA if the OIS included data regarding options for performing work activities that are typically found among a number of occupations as they are generally performed throughout the nation. The sit-stand option is a prime example, as is the use of tools such as a nail gun instead of hammer, etc. However, we note that the study of some work options among occupations (particularly as the "options" relate to machinery or processes) may reveal that the work requirements have changed as technology has changed. For example, the use of computerized devices to replace heavy machinery on automobile production lines, for example, may reduce the overall strength requirement for the occupation while it increases the training time needed.

### 8. Data Collection

A number of external users offered suggestions regarding the use of various professionals to work with SSA to conduct occupational analyses for the OIS. We wholly support developing and testing the option of integrating professionals in vocational rehabilitation and related areas into the OIS data collection process. We have flagged this idea for further consideration with the Panel and SSA when the R&D phase of the project begins developing data collection methods to be piloted and assessed.

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### F. Summary of External Users' Input

In 2009, SSA project staff developed and conducted qualitative user needs analyses (UNAs) to gather ideas and concerns regarding data for the OIS Content Model from SSA and DDS adjudicators, medical staff, quality reviewers, and program staff. With the assistance of the OIS Workgroup, SSA project staff was privileged to conduct UNAs with SSA occupational information users from the following offices:

- DDS, Clarksburg, West Virginia
- DDS, Greensburg, Pennsylvania
- DDS, Maryland
- Office of Disability Adjudication and Review, Office of Appellate Operations
- Office of Operations, Atlanta Regional Office, Center for Disability Operations
- Office of Operations, Chicago Regional Office, Center for Disability
- Office of Quality Performance, OQP Atlanta, Disability Quality
- Office of Quality Performance, OQP Baltimore, Disability Quality
- Office of Quality Performance, OQP Chicago, Disability Quality
- Office of Retirement and Disability Policy, Office of Medical and Vocational Experts

The results of the SSA UNA for the OIS Content Model can be found in Sub-Appendix C.<sup>6</sup> The results in Sub-Appendix C represent all of the comments received at these sites, regardless of the number of times a particular comment was made. Below, we have summarized the comments by topic, focusing on the themes that were consistently described. Some of the comments provided were outside of the scope of the current inquiry, Content Model. SSA project staff will forward any comments that reference existing SSA policy or processes through the OIS Workgroup to the responsible components for their consideration. SSA project staff will retain, for future consideration, those comments that reference future work on the OIS.

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<sup>6</sup> From report: SSA Working Paper (2009). *SSA User Needs Analysis for the Occupational Information System Content Model*. Baltimore, MD: Social Security Administration, Office of Program Development and Research.

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Earlier, we identified eight themes that arose from external users. Six of these eight themes were consistently found among SSA occupational information users as well.

### 1. Update the DOT

- Update jobs
- Provide more detail for the worker traits and work demands already described in the DOT; develop new worker traits and work demands; and develop new measures for worker traits and work demands

While SSA users of occupational information consistently asked that occupational information be updated, they did not call for the agency to update the DOT, per se. In fact, the data requirements that they consistently described could not be accommodated by simply “updating the DOT,” since these data requirements involve deconstructing existing DOT worker traits and work demands, using new measures for these worker traits and work demands, and adding new worker traits and work demands.

### 2. Data vs. Their Application

- Suggestions regarding software and presentation, usability of the data
- Suggestions for enhanced, computer-supported claim intake processes
- Suggestions for enhanced, computer-supported decision-making
- Concerns regarding SSA adjudicative policy at Steps 4 & 5

SSA users of occupational information are excited by the prospect of the development of a new OIS and related computer software, as it will provide an opportunity for streamlined and simplified claims intake processes. They identified multiple examples of benefits to both claimants for disability benefits and the agency. They also provided multiple examples of ways in which the new OIS can provide adjudicators with better support when deciding cases at Steps 4 and 5, which will improve the efficiency and consistency of the decision-making process.

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As previously mentioned, the concerns that SSA users raised regarding SSA policy and procedures will be forwarded to the responsible components.

### 3. Classification: U.S. Labor Market Connection

- Need for information to establish significant numbers of jobs in the economy
- Need for crosswalks to other Federal occupational classifications

SSA users of occupational information consistently cited a need for information about the incidence of jobs in the national economy and other occupational classification systems. For example, they indicated a need for information about military occupations.

### 4. Content Model: Worker Traits and Work Demands

- Suggestions for developing worker trait and work demand information that is more appropriate for individuals with impairments
- Call for deconstructed worker traits to enable more focused assessment of individual attributes (e.g., separate position (sitting, standing) from lifting, carrying, walking as now combined in DOT sedentary and light “strength” definitions)
- Recommended worker traits and work demands
- Suggestions for measurement of worker traits and work demands

SSA users of occupational information consistently reported a need for more detailed information about worker traits and work demands. They commented on the lack of information regarding the mental demands of work and limited information about work activities. They advised that the aggregation of occupations into categories of sedentary, light, medium, heavy, and very heavy work obscures the actual requirements of work, and asked that these categories be deconstructed into separate data about occupational requirements for sitting, standing, walking, lifting, carrying, pushing, and pulling. They reported a need for more detailed and consistent measurements of worker traits and work demands and provide specific suggestions for types of measurements.

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SSA users consistently reported a need for occupational information that is more appropriate for individuals with impairments. For example, it would be helpful to know if an impairment to one hand or one eye would prevent an individual from performing an occupation. It would be helpful to know if an individual could move around on the job, at will (e.g., sit-stand option), to relieve pain in his back. While information about an occupational requirement for “occasional” handling is helpful, it is often more important to know whether an occupation requires a worker to repetitively handle.

Specific suggestions for worker trait and work demand information are presented in Sub-Appendix C.

### 5. Data Suggestions for Work History and Transferability Assessments

- Suggestions to improve the manner in which SSA obtains work history information from the claimant
- Suggestions for development of a common language or terminology to describe skills (work activities) across occupations so that comparisons can readily be made between occupations
- Suggestions for development of information about an occupation’s core skills (work activities)
- Suggestions for development of information about the amount of time (e.g., percentage of the day) spent on each of the occupation’s skills (work activities)
- Suggestions to deconstruct the concept of skill level (i.e., unskilled, semi-skilled, and skilled); instead, provide information about the occupation’s educational requirements, training needed, the degree of complexity involved, the number of steps involved, etc.
- Suggestions for development of detailed work context information

SSA users of occupational information consistently reported, first, that the agency’s existing process for obtaining work history information from the claimant is unnecessarily complex and difficult. They believe the development of the OIS provides the agency with an opportunity to simplify this process and provide greater support to the claimant as he or she is filing a claim for disability benefits. Second, SSA users consistently reported a need for more detailed information

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about skills (work activities), job complexity, and occupational requirements for education and training. SSA users advised that SVP does not provide adequate information for either evaluation of skills and their transferability or assessment of the ability to work for individuals with mental impairments. Third, SSA users reported a need for more specific and comprehensive information about work context, for example, work setting, work processes, technology, and tools, equipment, and machines used.

### 6. Work Options

- Suggestions to obtain information regarding work options for taking a break when needed
- Suggestions to obtain information regarding a worker's ability to change position when needed (e.g., a "sit-stand" option" for occupations)
- Suggestions to obtain information regarding workplace options such as flexible schedules and flexible work locations (e.g., telecommuting or working from home)

SSA users of occupational information consistently reported a need for information about work options that are available to workers in a given occupation. Information about existing work options is important to disability evaluation since these options potentially provide an opportunity for workers with impairments to continue working despite their impairments, without requiring a worker to request reasonable accommodation for an impairment or disability.

### G. Communication Needs and Methods

One of the goals of the UN&R subcommittee is to engage as many occupational information stakeholders, experts, users, and others in the education of the Panel members and SSA project staff. We are also interested in generating a public dialogue regarding the creation of a new OIS. Alternatively, we recognize how critical it is for the Panel to communicate clearly its mission and activities. The UN&R subcommittee will pursue many methods to encourage a two-way communication between the Panel and SSA/non-SSA audiences, including solicitations through the *Federal Register* as noted above, notices in professional journals regarding Panel website and email addresses, use of internet resources such as the Panel website, professional conference attendance, and outreach through professional organizations.

SSA has initiated several activities to communicate its mission and activities and those of the Panel to SSA and non-SSA audiences. In 2008, SSA established

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intranet and internet websites for the OIDAP ([www.ssa.gov/oidap](http://www.ssa.gov/oidap)), as well as an OIDAP email address (OIDAP@ssa.gov). SSA project staff routinely broadcasts Panel meeting information through an OIDAP email distribution list. SSA project staff also posts to the external OIDAP website relevant analysis and methods papers that have been shared with the Panel. Other messages posted to the OIDAP website include information regarding Panel activities (e.g., subject-matter expert Roundtable meetings) and updates from the Panel's Interim Chair.

Panel members and SSA project staff also give presentations at conferences of professional organizations to explain the Panel and OIS project missions and activities. Many professional organizations hold webinar series that may serve as a platform for outreach and education regarding OIDAP activities. We have included a list of organizations and upcoming conferences in Sub-Appendix B.

We have also investigated a number of electronic methods to encourage the free exchange of ideas between and among users, the Panel, and SSA staff.

Outreach to the general public is the most difficult to engineer and organize. The Panel intends to maintain an open door policy and values public input. The Panel's website includes a link that invites interested persons to send comments to the Panel. However, while the website and email address have been active since January 2009, they have not elicited the amount of relevant input or communication that the OIS project staff anticipated. It is possible that users may view an email address of an entity rather than a specific individual in SSA as impersonal, and this could discourage people from using such a medium. Also, managing the flow of communication via email may pose challenges in terms of reaching all target audiences and the staffing needed to respond to inquiries. Therefore, we have investigated several internet resources such as message boards, "wikis,"<sup>7</sup> and social networking sites to learn if any of these would be an appropriate tool for public outreach and exchange of information. The subcommittee is mindful that the use of internet resources may require SSA to dedicate staff to moderate the postings.

Social media include a variety of communication platforms for online communities, social networking sites, wikis, and blogs. These media can be either open to modification or comment by anyone accessing the media (i.e., open-authoring) or restricted with only the moderator posting changes to the media (closed-authoring).

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<sup>7</sup> According to Wikipedia, a wiki is a website that uses wiki software and allows creation and editing of a number of interlinked Web pages. Wikis are often used to create collaborative websites as it allows "open editing" of content.

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The UN&R subcommittee reviewed a variety of social media platforms, including their advantages and disadvantages, to arrive at recommendations regarding their use with the public. Although some social media may not present viable formats for interaction with the general public, they may present potential platforms for interaction with other populations, including users or the scientific or academic communities. Also, for this analysis, we did not consider more traditional forms of online communication (e.g., listservs) that may present venues for online communities of users or professionals to interact regarding the development of the OIS.

### *Review of Social Media Options*

We reviewed the following platforms:

- Social network sites (e.g., Classmates, Facebook, Flickr, LinkedIn, MySpace, Plaxo, Twitter, etc.)
  - Advantages
    - Cost to users
    - Credibility through connections
    - Connections through professional and personal nodes
  - Disadvantages
    - Blocks by some federal government agencies
    - Lack of anonymity of users
    - Scams and harassment
    - Time consuming
    - Mixes professional with personal
    - Control of content
    - No open/closed authoring

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- Wikis
  - Advantages
    - Idea sharing
    - Collaborative work on projects
    - Information dissemination
    - Anyone can edit
    - Easy to use and learn
    - Instantaneous so there is no need to wait for a publisher to create a new edition or update information
    - People located in different parts of the world can work on the same document
    - The wiki software keeps track of every edit made and it's a simple process to revert back to a previous version of an articles
    - Widens access to the power of web publishing to non-technical users
    - No predetermined structure - a flexible tool
    - Wide range of open source software wiki's
    - Discussion platform
    - Open/closed authoring
  - Disadvantages
    - Vandalism
    - Incorrect information
    - No independent fact checking/quality control
    - May be too open for some applications

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- Open to SPAM and vandalism if not managed properly
- Information can become disorganized
- Blogs
  - Advantages
    - Developed with simple procedures
    - Accessed and read by almost everyone with Internet access
    - Contemporary
    - Convenient
    - Open/closed authoring
  - Disadvantages
    - Time to update and post entries
    - Blogging on day to day issues is different from writing on the subject
    - Public forum
    - Not suited for issues requiring immediate solution

Due to the nature of the inquiry, such multimedia formats, such as iTunes, Vimeo, and YouTube, found to be used by other government sources (e.g., White House) were not researched. At this juncture in the OIDAP's process, these media are found to be of limited value.

### Online Behavior

Interactive social media, whether synchronous or asynchronous, may elicit different online behavior than in other forms of communication. Unlike other forms of communication, anything done online has the potential to be intercepted, captured, stored, transmitted, copied, and easily altered.

### Other Government Sites Reviewed/Contacted

- [www.whitehouse.gov](http://www.whitehouse.gov)
  - Makes use of blogs and social networks

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- Blog with closed authoring and no comments is the main source of communication
- NASA ( <http://colab.arc.nasa.gov/> <http://colab.arc.nasa.gov/> ) Public Affairs
  - Public interaction
  - Research/Scientific v. client service/regulatory where constituency response expectations are different
  - History
    - Started involvement in online interactive media with the public two years ago
    - No federal policy for agency use of social media
  - Audiences
    - Public – strong outreach through social media
    - Scientific/research community – closed to the public, more use of traditional media (e.g., email interaction, closed listservs)
  - Forms
    - Social networks (e.g., Facebook, Twitter)
      - Questionable growth in audience
      - Twitter from spacecraft about a year ago
    - Wikis
      - Internally driven
      - High staff time for monitoring of content
    - Blogging – main form of public interaction/input
      - Closed authoring
      - No organizational structure – bloggers based on staff interest
      - Accepts comment (several hundred per week) and range widely from “Cool!” to substantive

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- Technical
- Use of any style – NASA uses *Associated Press* for public relations print media but has no particular adopted style for social or online media.
- Staffing considerations

Only 1% to 2% of comments through open authored media involve inappropriate material that needs to be edited by moderator. Six employees involved in blogging and other outreach media. During peak times (e.g., launches), maximum time between all staff is 0.5 Full Time Equivalent. Daily time commitment per staff member involves a few minutes.

### Applied Research

The development of the OIS should be informed by qualitative and quantitative studies at each stage of R&D that are designed to obtain user input and to test the effects of the OIS Content Model, Classification, instruments, and development methods on SSA's disability programs and process. We describe below the studies that SSA project staff have underway or completed in 2009 to support SSA's occupational information needs, particularly those related to the development of the OIS.

SSA User Needs Analysis: As described in the previous section, *Summary of Internal Users' Input*, SSA project staff developed and conducted a qualitative user needs analysis (UNA) to gather ideas and concerns regarding data for Content Model from SSA adjudicators, medical staff, quality reviewers, and program staff. The results of the SSA UNA for the OIS Content Model can be found at Sub-Appendix C.

Occupational and Medical-Vocational Information Claims Study: SSA project staff is now developing a study of adult disability claims, at the initial and appellate levels, to capture occupational and medical-vocational information. We understand that the Occupational and Medical-Vocational Information Claims study will be conducted by SSA reviewers and is intended to address these questions:

- Which occupations are most frequently found in the work histories of disability claimants whose claims are decided at Steps 4 or 5 of the SSA sequential evaluation process?
- What physical and mental limitations are associated with claim outcomes, both allowances and denials?

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- What occupations does the agency cite (either claimant's past work or other work cited SSA cites as examples) when it finds that the claimant has the residual functional capacity to work?

The Occupational and Medical-Vocational Information Claims study is intended to inform the development of the Content Model and Classification system, as well as to target first those occupations that are most relevant to SSA when job analysis instrument testing and data collection begin. The study design and instrumentation are expected to be completed by the end of August 2009, when the study pre-test with reviewers is scheduled to begin. SSA expects to finish the study by the beginning of January 2010.

Review of the Use of Occupational Classifications Internationally: SSA project staff has initiated an investigation of the use of occupational information by classification system internationally. A report on the results is expected in the Fall 2009.

Short-Term Project: In September 2008, SSA began a contracted evaluation of a private-sector update to the DOT to determine if an updated DOT-based data set exist that meet SSA's criteria that may be integrated into its disability process seamlessly while the OIS is developed. On June 30, 2009, SSA received the final evaluation report from contractor, ICF International, regarding the existing, updated DOT-based data and methods of another contractor, Career Planning Software Systems, Incorporated. At the time of this writing, the final evaluation report remains under legal review in SSA.

### **Other Data Elements Considered for OIS Content Model**

In addition to data regarding the physical and mental-cognitive demands of work and worker traits, as well as data needed for work history and transferable skills assessment, SSA needs other types of occupational information for disability adjudication. Users noted data elements such as literacy and requirements to communicate in English. We list our recommendations below.

We recognize that it might also be beneficial for SSA to collect occupational information solely for program evaluation and research purposes. Such data elements include the incumbent's (worker's) birth year and education level. In fact, these data elements might serve not only SSA in its long-term oversight and evaluation of its disability programs, but the data elements may also serve external users in the research and academic arenas. We list our recommendations below.

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### Recommendations for Communication

#### A. Public Comment Process

We submit the following recommendations for the Panel's consideration:

1. SSA should explore more extensive use of *Federal Register* notices to solicit public comments. We offer two possible options for consideration:
  - SSA should investigate the protocol and feasibility of publishing the Panel's recommendations in the *Federal Register*, inviting the public to comment for a designated period.
  - SSA should publish *Federal Register* notices independently of Panel meeting announcements. The notices could request public comment regarding specific topics of timely interest to the Panel or SSA that may inform Panel deliberations and meeting agendas, as well as SSA's OIS project work.
2. SSA should notify the public periodically (as determined by the Panel) of the nature of the public comments received between and during Panel meetings. SSA should summarize the comments and make the summaries available to the public. They may be posted to the OIDAP website, disseminated at face-to-face public Panel meetings, and broadcast to subscribers of OIDAP email. Comments received in response to a *Federal Register* notice may be summarized and published through the *Federal Register*.

#### B. Communication Methods and Venues

We submit the following recommendations for the Panel's consideration regarding ways to solicit input, to inform users and others about the Panel and SSA missions and activities, and to provide a platform for unsolicited input and an open exchange of ideas:

1. Publish notices in relevant professional publications advertising the OIDAP website and email addresses.
2. Explore social media, yet tread lightly and thoughtfully. Of all social media currently available, a closed authored blog may be the best contemporary method to reach a variety of audiences with

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information about the Panel's activities and help engage public consideration on a variety of issues pertinent to the Panel's work.

3. Maintain basic static/receptive media
  - OIDAP e-mail
  - Website that serves as the Panel's virtual billboard but is not interactive
4. Push media
  - E-mail distribution list
  - Public service announcements through SSA that has its own distribution list
5. Develop consistent structure for any online social media use
  - Develop a "branding" style
  - Develop a style sheet for all print media to help brand the project and the Panel.
  - Develop presentation materials and PowerPoint slides regarding the project and Panel activities that can be modified to suit audience needs.
  - Develop criteria for moderators of social media sources regarding content, clearance, style, and online behavior.
  - Help set expectations and boundaries with disclosure statements notifying participants regarding authoring, anonymity, expected response, behavior, etc.
6. Monitor developments in new and emerging public media through ongoing SSA and Federal government efforts, including:
  - SSA's Future Systems Technology Advisory Panel (<http://www.socialsecurity.gov/fstap/>)
  - The Federal Knowledge Management Initiative

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7. Develop FAQ sheets for the public to address Frequently Asked Questions regarding OIS project and Panel activities.

### **Recommendations for Applied Research**

#### **A. User Needs Analyses**

We submit the following recommendations regarding user needs analyses for the Panel's consideration:

SSA should develop a formal plan to conduct UNA's throughout the R&D phase of the OIS project.

- The UNA plans and study designs should address various stages of OIS development (e.g., Content Model and instrument development) to capture user reactions and concerns, including operational and programmatic information.
- The UNA's should target as many SSA users as possible, as well as external users of occupational information who are directly involved in SSA's disability process (e.g., claimant representatives, vocational experts). We understand that the OMB Paperwork Reduction Act guidelines would apply for any studies or surveys that SSA conducts with external users.

#### **B. Applied Studies of Program and Process Effects**

We submit the following recommendations regarding studies of program and process effects for the Panel's consideration

SSA should study the effects of using OIS Content Model data elements

- SSA should conduct a study of the effects of the OIS Content Model data elements in SSA's disability process by comparing the use of prototype person-side instruments which include newly identified OIS Content Model person-side constructs and measures with the use of the current physical and mental residual functional (RFC) assessments using a sample of disability claims that have already been adjudicated. The results would inform SSA's RFC development, the claims intake process, other assessment

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

models (e.g., computer assisted technology), as well as the Content Model and the prototype work-side job analysis instruments. The study should involve SSA adjudicators and medical staff applying the new Content Model's physical and mental data elements.

- When the results of the field tests of the work-side instruments are available, SSA should conduct studies of the application of these data in SSA's disability process to assess the validity and effects of the data on both its disability process and programs. These studies would include effects of using physical and mental work demands data, as well as work activity and other occupational data critical to work history and transferable skills assessment.

### **Recommendations for Other Content Model Data Elements**

#### A. Other Content Model Data Elements—For Adjudicative Use

We submit the following recommendations for the Panel's consideration regarding additional OIS Content Model data elements that may be helpful for disability adjudication:

- Literacy (Does the occupation require the worker to be able to read or write? If so, in what language(s)?)
- Communication in English or other languages (Does the occupation require the worker to be able to communicate in English? Other language(s)?)
- Options for how work is performed (e.g., sit-stand option), including options for use of tools or technology to perform work activity
- Core tasks (or work activities)

## User Needs and Relations Subcommittee Content Model and Classification Recommendations

### B. Other Content Model Data Elements—For Program Evaluation and Research Only

We submit the following recommendations for the Panel's consideration regarding additional OIS Content Model data elements for program evaluation and research<sup>8</sup>:

- Worker's year of birth
- Worker's educational attainment
- Worker's chronological work experience (e.g., last occupation or up to the last three occupations, including duration, work activities performed)
- Worker's primary language and secondary, if any
- Worker's mode of transportation to the occupation
- Zipcode of worker's residence
- Worker's gender
- Worker's race and ethnicity<sup>9</sup>
- Worker: number of hours worked weekly or daily in occupation
- Worker: other jobs or occupations worked concurrently (Is worker holding down more than one job at once)
- Is occupation seasonal?
- Alternative work arrangements (e.g., telecommuting, part-time, job-sharing, flexible schedules, job reassignment)

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<sup>8</sup> All of the recommended OIS Content Model data elements for program evaluation and research must be collected according to the Health Information Portability and Accountability Act guidelines to protect Personally Identifiable Information.

<sup>9</sup> Pursuant to the OMB government-wide standards for Federal agencies collecting race and ethnicity data (62 *Federal Register* (FR) 58782, October 30, 1997, "Revisions to the Standards for Classification of Federal Data on Race and Ethnicity"). See also SSA's notice of a proposed system of records, Race and Ethnicity Collection System, 74 *FR* 41962, August 19, 2009.

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- Zipcode of employment entity
- Occupation's average shift(s) (Time of day and number of hours, various shifts?)
- Does employer offer health insurance? If yes, does worker participate in that program?

### **Evaluation Criteria**

Regarding information and communication needs, we will evaluate the success of our communication strategy for the Panel and that of the SSA project staff with continual feedback from SSA and external users. Evaluation criteria for applied research must be stipulated in the study designs of SSA projects.

## User Needs and Relations Subcommittee Content Model and Classification Recommendations

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# User Needs and Relations Subcommittee Content Model and Classification Recommendations

## Sub-Appendix A—User Comments

The Panel was privileged to receive, and has included here, a variety of comments and suggestions from the following interested external professional organizations:

American Board of Vocational Experts .....	A-1
American Occupational Therapy Association .....	A-5
American Physical Therapy Association.....	A-15
International Association of Rehabilitation Professionals .....	A-19
National Association of Disability Examiners .....	A-103
National Association of Disability Representatives .....	A-113
National Council of Disability Determination Directors.....	A-123
National Organization of Social Security Claimants' Representatives .....	A-129

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Comments Received  
from the

**AMERICAN BOARD OF VOCATIONAL EXPERTS  
(ABVE)**

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## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

### **COMMENTS RECEIVED FROM THE AMERICAN BOARD OF VOCATIONAL EXPERTS (ABVE)**

*RECEIVED July 20, 2009*

I received this today, so hope my comments can still be included. I have few because I agree with those provided below. I particularly agree with the need to look at repetitiveness as well as frequency in relation to physical demands. I would also like to express a concern about how we define job stressors since, obviously, what is stressful to one individual is not necessarily so for another. It might be helpful to add an instrument to have an individual identify preferences, perhaps something like an expanded interest inventory but possibly more open-ended, in which the person describes their likes and dislikes in the work environment (set their own goals/schedules, etc. versus knowing what is expected each day, being able to do different tasks in a day versus assigned tasks, working independently versus working with others, etc.). In addition, occupational descriptors should more clearly define the job requirements, such as frequent to constantly repetitive (assembly line worker), frequent unpredictable changes (ER doc/nurse), unpredictable changes with periods of relative inactivity (firefighter, police officer), typically responsible for meeting set goals, i.e. budget, quotas (managers, sales representatives, quality assurance, etc.

Thanks for the opportunity of participating

*RECEIVED July 13, 2009*

Overall all the comments basically related to any useful revision dealing with data that is more specific and better defined in terms of functional limitations. In my observations, the terms concentration, persistence, pace, stress, social functioning all come up in ODAR hearings and are used in different ways by all participants. If these terms and others could be more operationally defined it would help everybody. I have my own way of dealing with these terms based on by experience at hearings, through psychological examinations, etc. However, we all need to be on the same page. I will break down the comments in three sections: physical, mental, and miscellaneous.

#### **PHYSICAL**

1. Sit/Stand Option was a concern for many people. We are in bad need of explicit positional factors for stand/sit/walk, and combinations of such during a work day.
2. Exertional factors, i.e. light =10-20 pounds, etc. may need to be re-examiner. Also repetitiveness of lifting in addition to frequency. Example: Occurs x times per hour up to occasionally (1/3 of day).

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3. We need a comprehensive, updated taxonomy of acquired skills, maybe similar to the GOE descriptions in Selected Characteristics companion to DOT, in order to answer questions about transferability of skills.
4. The boundaries between unskilled and semi-skilled work need to be better defined. A SVP of 3 is often interrupted as being unskilled and not semi-skilled and this often makes vocational sense if not regulation sense.
5. Need some specific factors to address neck conditions---does lift/carry or stoop/crouch really address neck conditions?
6. Pain factors continue to be problem for everybody while the pain scale of 1 to 10 is helpful it really isn't specific enough.
7. Vision factors are not well addressed b current descriptors. Could use better acuity measures based on vision chart outcomes.

### **MENTAL**

1. As indicated above, terms such as concentration, persistence, pace, memory, etc. need better definition and we need a way of relating these to functional limitations in the work place.
2. Mental factors need to be updated and types of job stressors need to be broken out and categorized. An assembly line worker is under much different types of job stress than an accounting supervisor. Also stress is an subjective term and it needs to be assessed in terms of how useful it really can be in decision-making.

### **MISCELLANEOUS**

*Note: This section included references to proprietary software that have been removed from this public document.*

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Content Model and Classification Recommendations**

Comments Received  
from the

**AMERICAN OCCUPATIONAL THERAPY ASSOCIATION, INC.  
(AOTA)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**Social Security Administration Content Model**  
**Comments of the American Occupational Therapy Association**  
**Submitted**  
**August 10, 2009**  
**to the**  
**Social Security Administration**  
**Occupational Information Development Panel**

**1. What moderate-specificity elements, on the job- and person-side, should SSA consider including in its OIS?**

To better illustrate responses, both the levels of specificity and job and person related elements are described below as per questions 3, 5, and 8. Appropriate job-person alignments can occur if data collected about job demands can be linked to data collected from client performance skill evaluations. The person must possess the required skills and abilities to perform the essential functions in his or her job area based on the work contexts. While this document addresses several areas related to job side and person side elements, the level of specificity needed in these areas is moderate to low.

The job examples provided for each element below are used only as descriptions and not necessarily based on direct interview or observation.

**Job Side**

- **Safety sensitivity** is an important component in industry and must be considered as medications, cognition, psychosocial, sensory, physical and emotional regulatory factors may limit a person's ability to perform certain positions safely. A safety sensitive job can be identified as an occupation which:
  - presents a clearly significant life threatening danger to the employee, his fellow employees, or the general public and is performed in a manner or place inherent with or inseparable from such danger
  - requires the exercise of discriminating judgment or high degree of care and caution
  - is separate from the ability to discern impaired or enhanced performance by direct supervision and is not reasonably subject to other valid and available means of observation and evaluation  
(<http://www.ctdol.state.ct.us/wgwkstnd/laws-regs/highrisk-regs.htm>)
  - Examples:
    1. Air Traffic Controller – safety sensitive
    2. City Bus Driver – safety sensitive
    3. Sales Manager – Not safety sensitive
- **Physical demands** – physiological functions of body systems that are required to support the actions used to perform the activity. Current Dictionary of Occupational Titles (DOT) categories of sedentary, light, medium, heavy, very heavy should be kept.
  - Examples:
    - Office Advisor – sedentary
    - Construction Worker - heavy

- **Cardiovascular demands** – the level of required cardiovascular endurance differs widely among jobs and can be separate from the description of physical demands currently offered by the DOT. A simple rating scale can be used to identify areas of higher cardiovascular requirements. Jobs may be classified as having low, medium or high cardiovascular demands or can be reported as variable based on work contexts in a given profession.
  - Examples:
    1. Plant supervisor – Low: minimal level of cardiovascular demand, no noticeable increase in heart rate or breathing rate with job or task performance
    2. Hospital Nursing – Medium: moderate level of cardiovascular demand, some increased heart rate and/or breathing rate with job or task performance.
    3. Fire Fighter – High: high level of cardiovascular demand, significant increased heart rate and/or breathing rate with job or task performance
- **Hand, dexterity, and coordination demands**–. The Classification of Jobs (COJ) rating scales for dexterity (1 being high level skill and 5 being low level skill) can be used. Additional rating scales or assessments for coordination should also be used.
  - Examples:
    1. Surgeon - Dexterity level 1, bilateral coordination
    2. Yard Foreman – Dexterity level 3
- **Cognitive demands** –actions or behaviors used to plan or manage the performance of an activity. Levels can be kept general with ratings of low, medium and high based on consideration of the following mental functions:
  - Judgment
  - Attention
  - Memory
  - Sequencing or time organization – e.g. whether the job has task or deadline flexibility
  - Multitasking
  - Task variability (how many different types of tasks the job requires and the ability to switch between tasks quickly to meet demand)
  - Analytical ability
  - Examples:
    1. Low – Copy Assistant (making copies): low level of judgment or decision making required, moderate level of time organization, low level of multitasking, very low task variability
    2. Medium – Mason: moderate level of judgment required, moderate level of time organization, moderate level of multitasking, moderate task variability
    3. High – Scientist: high level of judgment required, high level of sequencing and time organization, high level of multitasking, high analytical ability, high task variability
- **Social demands** - social environment and cultural contexts that may be required by the activity. A simple rating scale of low, medium and high can be used to define social demands within jobs based on consideration of the following components:
  - Social standards or rules associated with performance and work culture
  - Expectations of others in the group (e.g., use of language, level of interaction, sharing of information or resources)
  - Social participation expectations

- Examples:
  1. Medium - Software Game Developer: moderate to low associated social standard, moderate group expectations
  2. High – Sales: high social standards, high group expectation
- **Space demands** – physical environmental requirements of the activity (e.g., size, arrangement, surface, lighting, temperature, noise, humidity, ventilation). Special considerations related to intensity of sensory stimuli in the work environment should be given. Also, the ability to control or regulate the environment (such as temporarily leaving or altering the environment) and special situations such as work in confined spaces, elevated spaces or shift demands must be considered.
  - Examples:
    1. Transcriptionist - Low space demands: low sensory stimuli, high ability to regulate environment, no special considerations
    2. Commodities Trader – High space demands: high sensory stimuli, low ability to regulate environment, no special considerations
- **Specialty sensory or perceptual skill demands** - actions or behaviors required to locate, identify, and respond to sensations and to select, interpret, associate, organize, and remember sensory events based on discriminating experiences through a variety of sensations that include visual, auditory, proprioceptive, tactile, olfactory, gustatory, and vestibular.
  - Examples:
    1. Touch sensation needed for mechanics working in areas where they cannot see their hands (stereognosis)
    2. High visual acuity for airplane pilots
- **Level of supervision available**- should be considered for its effect on cognitive, social and potentially other areas related to job demands.

## Person side

- **Motor and Praxis Skills**
  - *Motor*: Actions or behaviors a client uses to move and physically interact with tasks, objects, contexts, and environments (adapted from Fisher, 2006). Includes planning, sequencing, and executing new and novel movements.
  - *Praxis*: Skilled purposeful movements (Heilman & Rothi, 1993). Ability to carry out sequential motor acts as part of an overall plan rather than individual acts (Lipmann, 1920). Ability to carry out learned motor activity, including following through on a verbal command, visual–spatial construction, ocular and oral–motor skills, imitation of a person or an object, and sequencing actions (Ayres, 1985; Filley, 2001). Organization of temporal sequences of actions within the spatial context, which form meaningful occupations (Blanche & Parham, 2002).
  - Examples
    1. *Lifting* a box of materials
    2. *Bending* and *reaching* for a piece of equipment
    3. *Pacing* tempo of movements to clean the room
    4. *Coordinating* body movements to complete a job task
    5. *Maintaining balance* while walking on an uneven surface
    6. *Anticipating or adjusting posture and body position* in response to environmental circumstances, such as obstacles
    7. *Manipulating* keys or lock to open the door

- **Sensory and perceptual skills** – actions or behaviors required to locate, identify, and respond to sensations and to select, interpret, associate, organize, and remember sensory events based on discriminating experiences through a variety of sensations that include visual, auditory, proprioceptive, tactile, olfactory, gustatory, and vestibular.
  - Examples
    1. *Positioning the body* in the exact location for a safe jump in a firefighting drill
    2. *Hearing and locating* the sound of equipment alarms
    3. *Locating* the right screw in the underbelly of a car when it cannot be seen (i.e., *stereognosis*)
    4. *Timing the appropriate moment* to change lanes by determining one's own position and speed relative to the speed of traffic
    5. *Regulating sensory information so work can be accomplished without distraction.*
- **Emotional regulation skills** – Actions or behaviors a client uses to identify, manage, and express feelings while engaging in activities or interacting with others.
  - Examples
    1. *Persisting* in a task despite frustrations
    2. *Controlling* anger toward others and reducing aggressive acts
    3. *Recovering* from a hurt or disappointment without lashing out at others
    4. *Displaying* the emotions that are appropriate for the situation
    5. *Utilizing* relaxation and adaptation strategies to cope with stressful events
- **Cognitive skills and mental functions**– actions or behaviors used to plan or manage the performance of an activity.
  - Examples
    1. Selecting tools and supplies needed to clean the work area
    2. Organizing activities within the time required to meet a deadline
    3. Prioritizing steps and identifying solutions
    4. Creating alternate solutions to a given problem
    5. Multitasking- doing more than one thing at a time, necessary for a variety of work tasks
- **Communication and social skills** –actions or behaviors a person uses to communicate and interact with others in an interactive environment (Fischer, 2006).
  - Examples:
    1. Looking where someone else is pointing or gazing
    2. Gesturing to emphasize intentions
    3. Maintaining acceptable physical space during conversations
    4. Initiating and answering questions with relevant information
    5. Taking turns during an interchange with another person verbally and physically

**2. Are there conceptual frameworks in which these moderate-specificity elements can be grouped and, if so, what are they?**

- The International Classification of Functioning, Disability, and Health (ICF) is the World Health Organization's framework for measuring health and disability at both the individual and population levels. These classifications are widely accepted.
  - Classifies health and health-related domains into the structures and their functions, activity and participation
  - Includes list of environmental factors since an individual's functioning and disability occurs in a context

- Can provide the framework for a comprehensive and coherent disability-related social policy at the individual, institutional, and societal levels
- According to the ICF Beginners Guide:
  - In both the health sectors and other sectors that need to take into account the functional status of people, such as social security, employment, education and transportation, there is an important role that ICF can play. It goes without saying that policy development in these sectors requires valid and reliable population data on functional status. Legislative and regulatory definitions of disability need to be consistent and grounded in a single coherent model of the disability creation process. Whether it is devising eligibility criteria for disability pensions, developing regulations for access to assistive technology, or mandating housing or transportation policy that accommodates individuals with mobility, sensory or intellectual disability, ICF can provide the framework for comprehensive and coherent disability-related social policy.  
<http://www.who.int/classifications/icf/training/icfbeginnersguide.pdf>

**3. What degree of specificity should be described for the elements on the job-side of the content model?**

- Addressed under question 1

**4. How can SSA ensure that the language of its OIS content model reflects terminology common to human medical and functional assessment?**

- Using existing language that is widely accepted is important and should be used over inventing new terminology. Existing language should be pulled from:
  - The ICF
  - The DOT
  - O\*NET

**5. What degree of specificity should be described for the elements on the person-side of the content model, both in the OIS database and in the RFC assessment process?**

- Addressed under question 1

**6. How can these elements be described so that they can be readily associated or compared with an individual's physical or mental functioning or with an individual's vocational profile?**

- Cross matching existing resources, such as O\*NET and the ICF would provide unity and reduce duplication of existing material. For example, using O\*NET's behavior anchor scales and the ICF functions and activities measures together would unify the two systems to provide the degree of specificity needed for SSA.
- Where applicable, rating scales used above to describe job requirements can mirror existing scales derived through standardized testing.

**7. Should SSA consider including demographic elements describing job incumbents' age, education, and work experience for policy development purposes? What other data might be useful for us to collect for such purposes?**

- It can be in the SSA's interest to collect this information to monitor trends and guide policy. However, there is significant concern regarding appropriate use and regulations should be in place to safe guard against discrimination.

**8. To what degree should the person-side domain be expanded beyond its current focus on physical abilities?**

- In addition to information listed under question #1, the effect of pain should be considered. Not only is the existence of pain and its effect on physical function important, but the effect of pain on mental functions and emotional regulation can also significantly alter work performance.

**9. To the extent that the content model will include worker traits and work demands that SSA did not have access to before, what will SSA need to consider regarding claimant information it may need to make the best use of this new occupational information?**

- With the Custom Report area of the O\*NET now available, the level of performance for relevant activities, skills, abilities, and activities is presented, and detailed levels of performance for these areas are available using the 7-point behavior-anchored scales. These provide us with the level of demand of the job, similar to the previously used 'Classification of Jobs' handbook.
- Multiple factors, such as the context in which the occupation is performed, the specific demands of the activity being attempted, and the client's body functions and structures, affect the client's ability to acquire or demonstrate performance skills. Performance skills are closely linked and are used in combination with one another to allow the client to perform an occupation. A change in one performance skill can affect other performance skills. as can change of context. (Occupational Therapy Practice Framework, p. 639)

**10. What information should SSA include regarding general accommodations available within and among occupations or industries that offer workers options for performing the core tasks, such as a sit/stand option?**

- While becoming more common, ergonomic equipment such as sit/stand desks and lifting devices are not universal. Ability to accommodate will depend significantly on the resources of the employer.
- General ability to accommodate (such as low, medium, and high) related to areas of demand described in the job-side elements above is beneficial for both simple and complex recommendations.
  - Low – minimal ability to accommodate but does not preclude it
  - Medium – moderate ability to accommodate depending on employer, location, and disability
  - High – High ability to accommodate most disabilities in this area

- Some examples might include:
  - University professor:
    1. Cognitive accommodation – low
    2. Physical accommodation – high
    3. Social accommodation – medium
    4. Supervision/coaching - low
  - Off-shore drill operator:
    1. Physical accommodation – low
    2. Hand / dexterity accommodation – medium
    3. Space accommodation - low
  - Stock clerk:
    1. Supervision – high
    2. Cognitive accommodation – medium
    3. Sensory/space accommodation – high
    4. Physical accommodation –medium

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## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**AMERICAN PHYSICAL THERAPY ASSOCIATION  
(APTA)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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Terri A. DeFlorian

August 6, 2009

Occupational Information Development Advisory Panel  
Mary Barros-Bailey, PhD  
Interim Chair

To the Occupational Information Development Advisory Panel:

The Occupational Health Special Interest Group (OHSIG) of the Orthopaedic Section of the American Physical Therapy Association (APTA) is writing this letter to provide feedback to the Panel related to creating an occupational information system (OIS).

OHSIG understands that the goal of the Panel is to provide independent advice and recommendations on plans and activities to replace the Dictionary of Occupational Titles (DOT) used in the Social Security Administration's (SSA) disability determination process. We also understand that the Panel will advise the agency on creating an OIS tailored specifically for SSA, with the goal to improve the speed and quality of the disability process over the next five years.

We understand that work is in progress related to evaluation of the physical demands and environmental conditions under the sub-group chaired by physical therapist, Deborah E Lechner. We have not been involved in this process and therefore do not know if our concerns have been addressed.

The OHSIG applauds the initiative to develop an alternative taxonomy to replace the DOT. This is relevant not only for disability determination, but also for job placement and return to work efforts. Unfortunately, the O\*NET system that replaced DOT has not proven to be of much practical use for physical therapists who evaluate and treat injured workers. Not only do physical abilities comprise a very small part of O\*NET's Content Model, the descriptors for physical abilities are vague and general and do not relate directly to our functional evaluation process or methods to measure physical job demands. For example, dynamic flexibility is defined as "maneuvering a kayak through swift rapids." Trunk strength is defined as "the ability to use one's abdominal and lower back muscles to support part of the body repeatedly or continuously over time without "giving out" or "fatiguing." As a result, the Content Model cannot objectively describe a worker's function or work activities and therefore is problematic in return to work, in the hiring process, or when making placement decisions.

There are aspects of the older DOT system that are used more commonly by physical therapists who specialize in industrial therapy. However, some of these factors need adjustments in definitions, and others need more appropriate rating scales. For example, the overall STRENGTH physical classification system wording in the Dictionary of Occupational Titles is overly broad in grouping strength and positional tolerances and does not provide repetition guidelines. In addition this categorization does not recognize the variability in human performance encompassed by the NIOSH lift equation that recognizes variability of performance based on deviations from ideal. Lastly the categories are very broad (for example 20-50 pounds). Some of the physical demand factors should be rated with scales that relate better to how occupational health professionals measure these physical abilities. For example, it would be more appropriate to use Snellen charts to screen near and far visual acuity, rather than rating a person's ability by frequency during the work day.

OHSIG welcomes the opportunity to be more directly involved in providing constructive feedback during this important process.

Thank you for your time.

Professional Regards,

OHSIG, Orthopaedic Section, APTA  
Bill O'Grady, PT, Interim President  
Dee Daley, PT, VP/Ed Chair  
Margot Miller, PT, Advisor  
Drew Bossen, PT, Practice Chair  
Rick Wickstrom, PT, Advisor, Membership Chair  
Kathy Rockefeller, PT, Research Chair  
John Lowe, PT, Nominating Chair

**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**INTERNATIONAL ASSOCIATION OF  
REHABILITATION PROFESSIONALS  
(IARP)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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### *Public Comment to the OIDAP*

*September 17, 2009*

*Lynne Tracy, IARP OIDAP Liaison Committee Chair  
Angela Heitzman, IARP OIDAP Committee Member and IARP Board  
Member*

Good morning.

We would like to take this time to comment on the draft report and recommendations as we have listened over the last 1+ days to the Panel and performed a review of the Panel's report obtained yesterday. This is a cursory review due to the size of the document. We will respond in greater detail at a later date.

#### *Taxonomy Subcommittee & other General Comments*

1. We support a quality study and measure of variables. We would like to add that we are concerned that the process could be mired down by studies and caution having too many pilot studies.
2. We support the use of Vocational Experts (VEs) in the pilot study to conduct job analyses.
3. SSA VEs can also assist in the collect information to avoid the need for OMB approval.
4. We would like to suggest that any data collection pilot studies of physical demands and cognitive/mental demands be done together.
5. Recommendation B. 1. b) ii. States that job incumbents would be surveyed during the pilot survey. We wish to raise the potential issue of access to job incumbents through employers, and suggest consideration be given as to how this will be accomplished.
6. Under the Glossary of Terms, 'Holistic Rating' states that "-rating of a whole occupational construct or trait (Level 5 or 4) on some metric, as opposed to separating said activity into its observable (Level 2 or 3) parts for purposes of analysis." We would request some clarification on this point as it was our understanding that part of the problem with the DOT was rating data at different levels. Does this definition not imply that there will still be different levels of data used in the new OIS? We may have a basic misunderstanding and therefore respectfully request some clarity on this point.

*Work Experience Assessment Subcommittee*

1. During the voting, the research and methodologies sections were removed from the WEA recommendations. We feel it is important to include research and methodologies in the final recommendations so they do not fall to the wayside.
2. We appreciate the sub-committee's in-depth look at the definitions of "skill" and "transferable skills."
3. We support the continued use and expansion of Work Fields, Materials, Products, Subject Matter and Services (MPSMS), and Machines, Tools, Equipment, and Work Aids (MTEWA).
4. We support changing or eliminating the idea of "unskilled" work and using low-skilled or some similar type of identifier.
5. We are concerned with the idea of predicting the viability of an occupation. It is difficult to predict when technology will become obsolete or when a new theory/process will be developed.
6. The draft report mentions the word "accommodations" in several areas. This concerns us because it is a very specific term related to the ADA, and may cause problems from a legal standpoint.
7. We are confused about the concept of combining work activities with other work elements that might rise to the level of a skill. If skill is on a continuum and all occupations require at least a low-level of skill, we are uncertain what this means.

*Mental/Cognitive Demands Subcommittee*

1. We agree that the current Mental/Cognitive RFC format needs retooling and support the 15 abilities developed/recommended by the sub-committee.
2. We whole-heartedly agree with the recommendation that clinical judgment must be preserved.
3. Some of the language in the recommendations was clearer in meaning in the draft report than in the voting schematic.
4. We are concerned that the current M/C RFC is based too much on the subjective information gathered from applicants.
5. There are several concepts that are worded poorly or appear problematic. The concept of attendance/punctuality gives as an example "leaving the residence/home." The use of this example detracts away from more likely reasons for attendance or punctuality problems such as transportation, child care, pain, etc. Leaving the residence is perhaps more related to psychiatric disorder.
6. Criticism is a very subjective concept and as a variable difficult to measure.
7. The self-management variables appear difficult to measure in a job analysis process. These may be better placed on the RFC but not on a job analysis form.
8. We are concerned about the ability to adequately measure and capture symptoms that wax and wane (such as many psychiatric disorders).

*Physical Demands Subcommittee*

1. We agree with the need for operational definitions, but suggest that they need to be in terms that can be easily understood by employers and others.
2. We would like to clarify that on Page 11, 2<sup>nd</sup> paragraph of the Subcommittee's report, IARP did not make the recommendation regarding a scheme for repetition.
3. We would anticipate problems addressing factors such as mold/mildew exposure in work setting with an employer(s) when collecting data for the OIS and subsequently when put into practical use. Such information could potentially expose an employer to litigation.
4. Likewise, factors of an ability to "alternate position" such as a sit/stand option and use assistive devices can be employer-specific and could again expose an employer to litigation. Although as a profession, we would find this information valuable to have, we also see the difficulty in documenting this in such a widely used OIS.

*User Needs and Relations Subcommittee*

Although we have not yet heard this committee present, we do have several comments.

1. We appreciate the openness of this process and the ability to voice our supports, concerns, etc. via direct presentation, public comment, our membership survey results, and the recently published article "A Call to Update the DOT" by an IARP committee.
2. We support the multiple methods that are recommended to keep users in the loop and involved in the process.
3. We primarily support the extra data elements recommended but do have concerns that these elements, such as assistive devices and the sit/stand option—when gathering this data from employers—may be treading too closely to the ADA.

*General Comment/Offer of Assistance*

With regard to the Data Analytic study completed of SSA Disability Research Files, we would like to offer to also gather data for the OIDAP from Social Security VEs with the intent of providing SSA and the OIDAP with additional information on the frequency of occupations seen in disability claims at the hearing level.

We would propose to ask IARP VEs to gather the following data at every hearing they participate in for approximately the next one to two months:

1. Job title listed by the claimant as their past relevant work (PRW);
2. VEs classification of the job title (PRW);
3. Exertional classification of the occupation per the claimant's report;
4. Exertional classification of the occupation per the DOT;
5. Exertional classification of the occupation per the VE if differing from the DOT;
6. Notation as to whether the work history was adequately reflected on the work history form to allow proper classification.

IARP OIDAP Liaison Committee  
Public Comment, September 17, 2009

In closing, we would again ask that the Panel continue to keep in mind that we are dealing with individuals, not just data and statistics. We look forward to continued dialogue.

IARP OIDAP Liaison Committee  
Lynne Tracy, Chair, OIDAP Liaison Committee  
Angie Heitzman, Forensic representative to the OIDAP Liaison Committee and Forensic Section  
Representative to the IARP Board  
Scott Stipe, SSVE representative to the OIDAP Liaison Committee  
Ann Neulicht, IALCP representative to the OIDAP Liaison Committee  
Pam Warren, CM representative to the OIDAP Liaison Committee  
Rick Wickstrom, DM representative to the OIDAP Liaison Committee  
Amy Vercillo, IARP Board representative and SSVE Section Chair

**Occupational Information System Survey Comments**  
**International Association of Rehabilitation Professionals**  
**August 3, 2009**

**Q1: Please provide your recommendations regarding inclusion of the following DOT items in the new OIS:**

**Occupations in the database:**

Modify:

1. update job descriptions to include modern technological innovations, e.g. Computer Operator is Light in DOT, should be Sedentary since PC's came on the scene.
2. Data is 20-30 years old. doesn't address many of the occupations found in today's labor market
3. update (6)
4. In the index, it would be helpful to also show the strength and SVP next to the DOT title.
5. The DOT items don't accurately reflect a field or multiple professional definitions and/or objective data. Without this, the sustained miscommunication and inaccuracy of measurement of objective data will continue
6. Current info in the DOT is hopelessly outdated and inapplicable to the 21st Century
7. All categories need modification, revision, updating, and in many cases, use of more than one benchmark for fuller description and validity of the particular attribute(s) that are being presented

Retain:

1. I think maintaining what most folks are used to will make the transition easier.

**Coding:**

Modify:

1. Coding system needs to align with SOC
2. Current coding is too large and unwieldy. Impossible to maintain and keep current
3. current coding system is too confusing
4. Base coding system on SOC codes BUT expand to include occupation-specific code to create unique occupational code
5. The specific breakdown of coding information is not something that I regularly use. To be honest, I look up a position title in ONET and do the crosswalk to find the corresponding position with DOT. It is an easier search.
6. Modify the coding system to include a digit for strength demand

7. The coding system is not efficient and there are so many overlaps with occs that it is not appropriate either. A new coding system that is more user friendly needs to be developed
8. Coding could be modified to be more compatible with O\*net,
9. too restrictive
10. It should be consistent with other national coding, SOC
11. relate easier to SOC and other coding systems.
12. Unskilled, semi-skilled and skilled occupations should have separate soc codes
13. system could be simplified such as the SOC codes

Eliminate:

1. coding system thwarts proper id of specific occ and industry designation appears less than useless now

**Physical requirements:**

Modify: Update: 1

1. descriptions should be modified to included repetitive tasks performed while sitting, issues of fatigue and endurance.
2. address the amount of time spent sitting, walking and standing
3. Need to specify repetitions related to frequency terms used, e.g. 1-12 reps/hour for Occasional, 13-30 reps per hour for frequent, 31-60 reps per hour for constant - this would be more applicable to materials handling tasks
4. Should evaluation Sit, Stand, Foot controls as separate work tolerances and limit this category only to materials handling forces.
5. SEDENTARY be changed to “Exerting up to 10 pounds of force occasionally and a negligible amount of force frequently to move objects”.
6. Should the label SEDENTARY be changed to VERY LIGHT
7. Definition for LIGHT be modified to “Exerting up to 25 pounds of force occasionally, or up to 10 pounds of force frequently, or a negligible amount of force constantly to move objects.
8. The definition for MEDIUM be modified to “Exerting up to 40 pounds of force occasionally, or up to 25 lb. of force frequently, or up to 10 lb. of force constantly to move objects.”
9. The definition for HEAVY be modified to 70 pounds of force occasionally, up to 40 pounds of force frequently, or up to 25 lb. of force constantly to move objects.
10. Definition for VERY HEAVY be modified to “Exerting in excess of 70 pounds of force occasionally, or in excess of 40 pounds of force frequently, or in excess of 25 lb. constantly to move objects.”
11. The label VERY HEAVY be changed to EXTRA HEAVY?"
12. Reaching with both extremities/ & overhead reaching
13. Need to be much more specific

14. For strength levels, include light-medium category
15. Further refine definitions of strength requirements
16. Separate sedentary exertional force from sedentary postural description so that sedentary refers ONLY to posture and some other descriptor be used for lifting of < 10 lbs.
17. STANDING, SITTING and WALKING should be entered separately in the physical descriptions
18. Physical strength - modify to be specific to lift/carry, push/pull only
19. Specific to the strength requirements I think there should be more of an emphasis on sitting and sitting duration. I see a lot of lower lumbar disc issues with limitations on sitting. Same is true for keyboarding related and cervical disc issues.
20. Specifically include "bending" as a physical demand.
21. Consider a 0 to 10% "seldom" category for physical demands analysis to enhance the occasionally, frequent and continuous.
22. Different strength levels for the same job needs to be addressed.
23. Should include a strength category of semi-sedentary as an independent category for jobs that require one to sit and stand through out the day.
24. In physical strength requirement- investigate additional physical demands other than just sitting, walking or lifting, include standing, reaching and at what levels
25. More detail for each job.
26. Strength should be a two letter code with one letter indicative of strength and the other indicative of predominant body posture
27. May want to include sit/stand option info
28. Add s-l and l-m depending on weight lifted and standing, walking & sitting
29. I'm not sure how to do it but the physical strength categories need some more generalization
30. In addition to physical strength, the amount of sitting, standing, and walking should be identified for occupations
31. Physical Strength Requirements should include 'Semi-sedentary' Physical Strength Requirement has gaps that are too wide. For example, the max. weight amounts for Light (20#) and Medium (50#) is too wide.
32. Physical strength demand should include variations for sitting and standing other than current
33. **DEFINE REPETITIVE**
34. Strength requirement is often too global to be useful since there is a significant number of jobs that may be combination - i.e. sed/light or light/med."

**Data, People, Things:**

Modify:

1. The D-P-T and task statements need to be modernized to take into account computers, technology and the variety of potential work arenas from office to mobile to telecommuting.
2. DPT- more clearly defined qualitative and quantitative
3. DPT - Try to establish the numbers as a true hierarchy.
4. The Data, People, Things categories could be expanded to include more information.
5. DPT needs to be updated to current standards

Retain:

1. Data, people, things is useful to the idea of working with similar processes for transferrable skills analysis

**Task Statements:**

Modify:

1. Update (10)
2. Task-modify to differentiate material from non material and which can be ""self"" modified/controlled
3. Essential job functions as well as non essential should be considered
4. overly broad
5. The task statements should be even more generalized to make the definitions fit better what people actually do in the jobs
6. Task statements need to reflect current day activities in an ever changing job market.
7. Task Statements should be less general, listing only the Essential Functions of the Job

**Industry:**

Modify:

1. Update: (8)
2. Industry designation should match NAICS
3. relate more directly with NAICS designations
4. Industry designation is important only for purposes of how it relates to the job analysis. Any industry designations provide a wider application for occupations particularly in the current job market
5. The industry designation should be modified to be more specific and to do away with "any" industry and N.e.c. classifications
- 6.

**SVP:**

Update:1

Modify:

1. SVP is a time to proficiency composite and should be considered in its elements and within work complexity, not necessarily in the present form that is limiting within the skills transfer
2. Have fewer SVP categories, to make simpler
3. Clarify that past experience may be a component in training time which equates to SVP. Examples: someone who has cooked at home can go into an SVP 6 cook job. Inclusion of education level requirements would be helpful
4. Further refine definitions of SVP
5. be more specific about type of preparation & degrees or experience
6. SVP should also be reclassified such that SVP 1 or 2 jobs are not ""unskilled"" but rather ""low skilled"". Also SVP should somehow correlate with total training or an educational requirement. There should be no SVP 8 medical doctors and SVP 6 housekeepers ...
7. There needs to be more consistency on SVP levels in regards to GED levels like reasoning being 3 while SVP is a 2 unskilled. It does make is really confusing. I think that there needs to be more of a SVP 1 and not 1 and 2. I would move the SVP level to 2-5 as middle of the road and reflect it into more entry level jobs with 2 being the end of semi-skilled jobs. Seldom do we have a SVP 1 job and this is a joke 1 & 2 are still unskilled. There should be a skill level designation to identify profession or highly specialized occupations."
8. SVP needs to be updated for many jobs. Many jobs with svp3 or semiskilled are actually entry level, SVP 1or2
9. SVP- tie to an educational attainment level and training. i.e. HS/GED, OTJ, Technical, Associate, Bachelor's, Master's, Doctorate etc
10. SVP should be more definitive when getting into skills that require training or education. Designate certificate, AA, OJT, etc and the timeframe

**May Items:**

Modify:

1. "May" statements should be broken down into essential/non-essential tasks to align better with post ADA standards
2. Separate the "may" items from the body of job tasks.

Eliminate:

1. too many

**Others:**

1. Begin to use certain critical factors from the ONET, such as Work Context Information.
2. The skill level needs to have separate designations
3. Allow greater flexibility for increased numbers of jobs
4. These things should be updated with new job analyses and new job titles done by analysis experts and industrial psychologists.

**Q2: Please provide your recommendations regarding inclusion of the current DOT General Education Development definitions in the new OIS:**

**Represent actual job requirements:**

1. Should be more realistic relative to actual requirements to perform specific job - i.e. some jobs do not require reading/writing English at all and are learned by demonstration.
2. May want to include "English" required.
3. Again, the definitions do not accurately reflect the objective information into the definition itself. Thus, the definition is meaningless.
4. Language level 1 is a problem; the definition needs to include information that deaf people and non-English speakers often perform the occupation and the reading and writing elements should be eliminated.
5. All should be modified. There are jobs that can be performed without ANY level of math or language, yet the current definitions include an unrealistic level functioning to perform the job.
6. Realistically, these definitely need modifications as they prove not useful in applying to transferrable skills or achievement testing. I find a big discrepancy from what the RML says and what a client is actually capable of doing.
7. The current RML codes do not seem to truly reflect the job requirements and are too broad, especially at the higher levels.
8. I believe that the current definitions far exceed the actual job demands for the unskilled and semi-skilled jobs as actually performed.
9. There might be a need to identify what kind of computer proficiency is expected.

**Accuracy:**

10. These do not always appear accurate in describing the job. Many jobs do not require reading, yet they may carry a 2 or 3 in the Language area. This appears to need better descriptors.
11. I do not believe these levels are accurate many times. We have many second language learners or those that have limited education that often do a particular job without coming close to the levels stated for job performance.
12. The language is difficult for Spanish speaking populations and the grid rules are influenced by Spanish speaking claimants. For instance, down on the boarder you can be a Spanish speaking housekeeper.

13. Tighten up the definition for Language=1. An attorney recently argued that his illiterate client could not perform any L1 work as L1 is defined. In reality, there are many illiterate persons doing very basic L1 work
14. Some of the unskilled jobs have inappropriate GED levels. Look at surveillance system monitor

**Understandability:**

15. As is the GED do not make since, still this information or some type of information is needed
16. "Many confuse this with Reading. Clarification should be made."
17. We understand the R and L designations, but are often asked to explain. For example, R is often confused and thought to represent "reading" which it does not. Rather than have to teach a course in the DOT, those elements could possibly re-named or expanded to be clear

**Level of Detail:**

18. Too simplistic. Needs to be expanded to capture more information and be more flexible. Change can be made to expand categories, not as much as ONET, but along those lines.
19. Add information on reading comprehension levels.
20. Need more categories and more specific details.
21. The levels as they are now defined do not show a clear progression.
22. Literacy and verbal communication thresholds should be detailed, as well as thresholds for non-English speaking workers.
23. These areas should be explained more fully, for example, the "Reasoning" section in the description of "Production Assembler"...carry out detailed but uninvolved instructions.
24. EXPAND EXAMPLES
25. Smaller increments such as 0 (none) to analytical (10) recommended

**Grade level equivalents:**

26. Academic achievement levels, in terms of grade level or percentage would be more useful.
27. Give a reference to percentiles or grade levels.
28. Please relate the GED codes to Grade level proficiency, i.e.: L:1 =<1st grade, M:6=HS+, etc. This would be extremely helpful (11)
29. Tie to an educational level. Add a level for those that have less than a HS education, Don't speak English, Lower IQ, etc
30. I believe that different levels would be helpful. The current level 1 equates to 1st to third grade level. There are some positions that can be completed, even if illiterate, a suggestion for more categories to include the first level being minimal English or reading/language skills might help.
31. I would tie these categories to actual grade levels either tested or assumed based on PRW.
32. Should be modified to include approximate grade level.
33. Give a grade level.

34. We need actual reading, math levels by grade more clearly defined.
35. More school grade appropriate would help. But actual educational skills would be the best.

**Update:**

36. Examine to reflect current labor market standards/ requirements.
37. Update reasoning to a newer term; language now is variable, English, etc.
38. Needs to be updated based on current educational standards.
39. Update to today's technology and usage. There are some definitions that don't make sense--many unskilled hands-on jobs that can clearly be done by non-English speakers that judges will eliminate if the Language is above a 1!
40. Keep the GED factors in but modify them to be certain that they reflect up-to-date criteria.
41. The definitions are 19 years old. Education has changed in this time period.
42. These seem to hold true and if anything they need to be brought up to date in terms on technical abilities which is a key factor in the job market today.
43. Update to current education.
44. All should be updated and various attributes added to this area, such as "critical thinking", "decision making", etc.

**Q3: Please provide your recommendations regarding inclusion of the current DOT Physical Demand elements in the new OIS:**

**General Comments;**

1. Physical demands fairly well delineated
2. it should be made patently clear that these ratings do not guarantee that a particular required task can be performed because they do not speak to the possibility of reasonable accommodation
3. include activity qualifiers for each (i.e., negligible, occasional, frequent, constant)"
4. Consider a 0 to 10% "seldom" category for physical demands analysis to enhance the occasionally, frequent and continuous
5. These are all helpful and should be updated to current standards, but the biggest area to maintain and update is the strength levels. Modification I am assuming to mean change in terms of an update, which I believe is required due to advances in how jobs are performed
6. These are all important, however in a practical usage the extent that the demands of the job are involved need a more specific definition
7. CLARIFY ALL ITEMS
8. I believe that a potential additional category of rare, occasional, frequent and constant might be beneficial. Constant is considered repetitive but there is a good argument that the later end of Frequent is also repetitive. Having 4-5 categories might help define the amount of time further
9. Again, all job descriptions are very outdated.
10. those marked modify need more precise explanation.

11. These seem to cover the bases in terms of the characteristic physical demands of a particular job
12. Need to be better defined
13. Additional measures of each attribute are essential, including validation of importance of each to performance of job tasks/requirements, etc. Considerations of environmental accommodations, task modifications, applications of Assistive Technology, etc., are also relevant and extremely important to each - How do these approaches/conceptual approaches apply to the worker requirements/characteristics identified?
14. Need to add neck
15. levels of frequency do not appear appropriate for the vision descriptors. stoop and kneel need better definitions i.e. to what levels
16. need to add keyboarding
17. neck flexion requirements

**Sit/Stand/Walk:**

1. add sit, stand, walk
2. add standing and walking
3. Needs greater detail to address standing, sitting, walking endurance
4. STANDING, SITTING and WALKING should be rated individually and not be lumped together
5. More specific information about duration of standing, sitting, walking
6. What about WALKING????"
7. sit/stand/walk options
8. add amount of time spent standing/walking and add a category which allows for alternation of position at will
9. Standing/walking should also be addressed
10. Consider adding standing, sitting
11. Should also include sit, stand, and walk requirements. They come up all the time in hearings
12. We also need to address, standing and sitting as additional categories.
13. I don't think any of them need to be eliminated, we need to expand them to include more activities like sit, stand and walk
14. ability to alternate positions

**Climb:**

15. I checked climbing because I'd like to see specifics regarding what is to be climbed, i.e. steps, ladders, etc.
16. should be rated using skill or aptitude levels rather than by frequency of occurrence because that is how medical professionals evaluate these factors
17. climb: it would be helpful to break out climbing stairs from climbing ladders from climbing step stools
18. Climbing stair versus ladders would be helpful
19. - differentiate between stair climbing and ladder
20. climb - differentiate on what (ladder, ropes, scaffold, stairs)
21. should be further defined. Do they climb stairs or ladders?

22. climb should be designated in two categories: ladder climbing; step climbing.
23. Climb - ropes and scaffolds need not be a separate category.
24. require more explanation

### **Bend/Stoop/Crouch/Kneel**

25. Replace "stoop" with "bend"
26. Kneel and crouch should be combined as a single factor because in most cases the person has the latitude to choose between these methods.
27. Bending should be added; crouching should be replaced with squatting
28. Crouch and Stoop are not especially important compared to Bend.
29. Kneel and crouch should be combined as a single factor because in most cases the person has the latitude to choose between these methods
30. Need to add bend
31. Crouch and Stoop are not especially important compared to Bend.
32. A general static/dynamic posture category could include these with bending/twisting
33. Stooping and bending should be completely separate items
34. stoop - modify/rename in order to include medical terms (squat and twist)
35. Specifically include "bending" as a physical demand.
36. Crouch/squat= full or partial squat
37. stoop - rename as bend
38. stoop/bend should be noted as being same. there should be a designation for twisting.
39. Crouch and stoop are same body posture. DOT defines bending as stooping which is incorrect from physical perspective
40. Add bending
41. Modify stoop to bend; need to clarify balance
42. Balance can be a judgment call based on the occupation and factors such as climbing
43. Change stoop to bend
44. Stoop should be changed to BEND AT WAIST
45. Kneeling and crouching could be consolidated since both involved knee flexion.
46. clarify stooping vs bending from the waist
47. Stoop & crouch are debated as separate categories; better to combine (i.e. ""stoop OR crouch"").
48. Could Stoop/Crouch be combined into bending (flexion or extension) or something like that
49. Need clarification on stoop and climb
50. Balance needs to be better defined. Perhaps using the examples listed in the Handbook for Analyzing Jobs would help
51. Climb, balance and stoop require more explanation. current job description utilize such activities as bend and twist
52. Consider changing stoop to bend or stoop/bend
53. stoop and crouch similar definitions should combine

### **Reach, Handle, Finger, Feel:**

54. Provide details how far in front of body or overhead
55. On reaching, need to differentiate above shoulder, at shoulder, below shoulder
56. With reaching, I'd like a breakout on reaching below shoulder and above shoulder height.
57. Handle, Finger, Feel should be eliminated because there is not a good quantitative way to measure these on a person or job
58. Reach: needs expanded definition including overhead & extended.
59. Reaching needs to be addressed as dominant hand, overhead, above waist, below waist, and directionally (in front, to the side, behind the body.
60. need to change r/h/f/f to differentiate between dom/non-dom hands/arms.
61. Reach needs to be clarified in def
62. Reach how? i.e. overhead, front, side
63. Reaching should be modified to include below, at and above the shoulder with right arm, left arm or with both arms. dominant or non-dominant arm. The reason is due to single upper extremity limitations.
64. Would be helpful to have breakdown of reaching requirements in different planes, especially overhead. Bi-manual handling and fingering or one handed tasks would be helpful.
65. reaching/handling/fingering need to be further refined
66. Needs greater detail to address upper extremity functions
67. Need to add one handed.
68. Reaching outward with extension should be more clearly differentiated from simple manipulation of objects near body--which may need a reach, but not requiring extension
69. reach - modify to allow differentiating below shoulder level; at shoulder level; and above shoulder level
70. add "reach up" above shoulder level
71. Reach: separate in to reaching outward and reaching overhead
72. outline reaching in different directions (overhead, etc)
73. reaching upward and downward
74. Reaching needs to be more specific relative to reaching at desk level, above desk, at shoulder, and above shoulder
75. Handling (simple versus power) and one handed versus bilateral.
76. Fingering one hand or bilateral.
77. Should include a physical demand for bi-lateral use of hands and one for one-handedness in the physical requirements
78. reaching= include bilateral or unilateral, distance and height
79. handle= unilateral or bilateral, fingering= unilateral or bilateral stoop/bend= at waist and what distance
80. reaching should specify the direction
81. reach - state in which direction; handle and finger - define if bilateral or not
82. there should be a designation for repetitive hand movements somewhere
83. Reach where? Overhead? In front of body? Down?

84. reaching should be further defined: Do they reach in front or above shoulder level?
85. Handle, Finger, Feel are very important but they seem to become meaningless if >90% require frequent. Tighter definitions and description of use.
86. Please add or include specifics regarding overhead reaching requirements.
87. Forceful Grasp, Push/Pull Required
88. Reaching should be modified to include reaching at desk level, above shoulder level.
89. In addition to the definition of "reach," include an element for "reaching overhead."
90. Clarify what part(s) of the body are involved with 'feel.'
91. Reaching should be separated from over-shoulder reaching
92. Clarification of Repetitive process for reach, handle, finger, feel
93. may want to carve out bi-manual (dominant vs non dominant hand)
94. Need more details, reach how, up, OVH, Down, Out, with dominant hand. One handed job information is very important and not currently addressed.
95. add if reach overhead is necessary
96. Reach: distinguish between lateral vs. vertical reach direction.
97. Need additional elements concerning manual & finger dexterity. Add overhead reach.
98. One-handed as well as bi-lateral use should be addressed in reach, handle and finger.
99. Reaching level should be specified (above shoulder, waist level, etc.).
100. 80 Manual tasks should be further defined as one-handed or bimanual
101. define reaching in terms of overhead, at shoulder level, in front, and whether it is repetitive (which is different than frequency)
102. define whether a job requires handling and fingering repetitively (again different than frequency)
103. Add directional information regarding reaching: overhead, above shoulder, between waist and shoulders, below waist, to the floor, in front of the body only.
104. Reach - should be specified (overhead, over two feet in front, behind, to either side, etc.).
105. Handle - should be specified (grasp, hold, manipulate, items over one pound, six inches in length/width dimension, etc.).
106. Finger- also specify (e.g., grasp, hold, manipulate, items less than 3 ounces, smaller than 3 inches in diameter, etc.).
107. Include overhead reach and whether handle is simple grasp vs. power grip
108. overhead reaching needs to be included
109. Reach should be subdivided into overhead, dominant hand, one hand etc.
110. define overhead, forward, lateral reaching...define repetitive handling and fingering. Add keyboard to fingering
111. Differentiate between upward reach and desk level reach
112. Reaching may be variable and a distinction between desk level, beyond desk level, and reaching involving the shoulder

113. Reaching should be modified to describe how far and what direction reaching would be done. Reach less than 20" or more than 20" for example, overhead should be included when possible
114. Consider adding both above & below shoulder level reach
115. Handle finger feel are often combined together as part of job, should consider combining terms as well
116. Would be helpful to have the REACH demand separated into OVERHEAD vs. regular forward reaching.
117. Direction reached (up, down, forward)
118. Reach needs to be more specific about overhead vs. in front/waist level.
119. These items should be explained in more detail overhead reaching, reaching forward, etc.
120. activities requiring upper extremities should be modified to address reaching above shoulder or below waist as well as repetitive vs non repetitive activities.
121. Designation should be expanded to include overhead reaching or added as a separate physical demand

**Senses:**

122. how smell or color vision relevant to position
123. Near acuity, and Far acuity factors should be rated using skill or aptitude levels rather than by frequency of occurrence because that is how medical professionals evaluate these factors
124. Taste/smell, depth perception, accommodation, color vision, and field of vision should be eliminated because there is not a good quantitative way to measure these on a person or job
125. Vision: Need more specific definitions including data routinely encountered on Vision Exams
126. vision descriptors
127. I don't know what accommodation is
128. Color vision is an aptitude
129. vision could be collapsed to fewer specifics
130. The term "Accommodation" is too vague and needs clarification
131. talk - include hearing requirement
132. Talking - Attorneys make a point in regards to communication for the job. There really needs to be some type of definition of what ""talking means"" A telephone solicitor talks but not the same as a front desk clerk
133. Visual tasks should be more functional - near acuity to read printed materials, computer screens, etc. Far acuity to drive, etc
134. Maybe change 'talk' to converse or speech or something that has more clarity.
135. What about HEARING???
136. Vision-broken down more specifically on acuity
137. Taste/smell rarely used
138. may want to distinguish bi ocular vs one eye
139. Perhaps an intermediate definition OR clarification between Near Acuity (20 inches or less) and Far Acuity (20 feet or more). What to do with visual requirements between 20 inches and 20 feet?

140. The vision requirements should state actual corrected acuities. When not available then on assumed acuities based on PRW.
141. You left out listening. Please include it.
142. Taste/smell - need is obvious to job title
143. Visual - So many variables can apply to this; better to list broad exclusionary parameters (or, possibly categories A, B and C), for visual demands."
144. talking is an obvious physical demand per job description
145. We also need a vision definition for type size.
146. Hearing needs to be added with decibel and frequency demands, and dangerous levels

**Q4: Please provide your recommendations regarding inclusion of the current DOT Environmental components in the new OIS:**

**General:**

1. combine all of these items and comment, if applicable only
2. an indication of frequency is desirable
3. exposure to high intensity stress, biohazards
4. include environmental condition of exposure to exposure to other dangerous work conditions not other wise listed
5. show a degree of exposure, not just the extremes
6. Get rid of "Other Environmental Conditions."
7. more detail would be useful in all categories
8. specify temperatures
9. "extreme" needs to be defined. This term means different things to different geographical regions
10. Concentrated exposure to dust, fumes and gases is missing. Uneven terrain should be added.
11. All job descriptions are very outdated.
12. Again these seem to cover the bases, the only one I think of to add would be for people with extreme environmental sensitivity to non toxic substances.
13. Most of these are implied by the job itself...
14. Lump the hazards together?
15. Add and define stressful work
16. All need review, consideration of expansion or deletion, etc. Not all will apply to each job task or complete occupation - how to handle more efficiently and effectively in performance of Transferable Skills Assessments and in use as an occupational information resource
17. More detail is needed in all areas of the DOT
18. working in high exposed places should be modified to working at heights. Exposure to radiation, chemicals, explosives, shock, etc, should be combined and defined as dangerous or risky environment. Would combine heat/cold, weather/atmospheric conditions. would add other environments-office, shop/manufacturing, etc

**Weather:**

19. Exposure to weather includes heat, cold wet humid and often used together in job descriptions

**Exposure to Cold:****Exposure to Heat:****Wet/Humid:**

20. Could include wet and humidity with weather exposure
21. Wet and/or humid, does it mean indoor exposure or outdoors. Usually it deals with weather or walking. For instance, someone who doesn't have the ability to walk on a wet floor.

**Noise Intensity Level:**

22. Noise should be scaled by level
23. More specifics about noise are relevant (i.e. need for hearing protection).
24. noise-modify to reflect current work settings
25. Noise intensity should have more levels which might include restaurant, traffic, etc.

**Vibration:**

26. Need to separate hand/arm versus whole body vibration
27. vibration should be scaled
28. vibration: separate upper extreme vibration from whole body or lower extremity; degree of vibration would be useful as well.

**Atmospheric Conditions:**

29. If you keep cold and heat, the atmospheric conditions is redundant
30. Need to clarify atmospheric conditions
31. Atmospheric conditions is vague and if it is going to continue to be used should be clarified
32. Separating out atmospheric conditions would be beneficial.
33. Atmospheric conditions should be better defined for the asthma problems.
34. Vibration should include vibrating tools
35. Atmospheric conditions does not adequately describe environments as is. Should be broken down to the components and each one assessed. It should consider persons with breathing difficulties in addition to persons with healthy lungs.

**Proximity to Moving Parts:**

36. for proximity to moving parts, if there is a safety guard or conveyor belt, it doesn't specify

**Exposure to Electrical Shock:****High Exposed Places:****Exposure to Radiation:**

37. it would be helpful to add in an item for electro-magnetic fields exposure

**Explosives:**

38. Working with explosives should be noted under tasks and is not a common requirement. Same with radiation. Need to wear protective clothing or to take protective measures should be noted in description of tasks

**Chemicals:**

39. Identify some of the chemicals

**Q:5 Please provide your recommendations regarding inclusion of the current DOT Aptitudes in the new OIS:**

**General:**

1. Modify name to something more specific such as "Wrist-Finger Speed" or "Keyboarding Speed" that can be evaluated by a typing test or other means
2. Aptitudes should include additional aptitudes for mechanical aptitude, and social aptitudes
3. These are useless in Social Security applications but very helpful in WC and Forensic cases.
4. allow for adjustment based upon vocational testing.
5. All of these items need to be placed on a 5 point scale with 1 being low and 5 being high. This will allow other calculations to be made
6. These are all either cognitive or psychomotor. Therefore, if cognitive demands of jobs that are considered, these would be included in that area. Likewise, the psychomotor aspects should be included under the physical demands.
7. These are important factors but need to be based on measurable criteria
8. Again, helpful to have, but they need to be reviewed/updated in relation to current duties.
9. Again, the DOT needs updating to include modern jobs with technological advances.
10. updated standards and norms are needed
11. Have a general IQ level, and a non-verbal abstract reasoning level. Include an aptitude that deals with dexterity for one-handed people.
12. finger and manual dexterity= differentiate if unilateral or bilateral
13. These categories were fine until the GATB was no longer a valid testing measure. Therefore, these aptitudes should be renamed or changed to fit

- better with current most commonly used testing methods, such as the Career Ability Placement Sorter (CAPS) and CareerScope.
14. Possibly consolidate into fewer rankings and levels
  15. How about adding computer literacy?
  16. better descriptors and more realistic relative to specific jobs -
  17. Many of these items are from a purely physical perspective, however, in reality, there are multiple neuropsychological measurements that must be included to define as well as evaluate an individual fully
  18. More detail as it applies to job would be useful.
  19. The categories for this are 1-5. For level 4, this is anywhere from 56-91 for a standard score. A suggestion would be to separate this category into 2 categories to better match the typical bell curve. Someone with an IQ of 56 would greatly differ from someone with an IQ of 90 on the later end of the scale.
  20. All need to be stated in standard measures such as stanines, percentiles, etc. Again based on actual measurements or PRW
  21. Include explanation of what is extreme
  22. All other aptitudes (possibly including the above as well) should relate to one or more standardized instruments - NOT the obsolete GATB).
  23. These are really not helpful unless claimants are specifically administered aptitude tests
  24. Modify with overhead activities
  25. From a practical standpoint some jobs don't need these abilities or aptitudes, yet the current DOT assigns values to them. They are then used by reps to eliminate jobs if the claimant doesn't have match those abilities or aptitudes.
  26. Has no place in SSA cases and very little value outside of this arena.
  27. Need to be better defined
  28. Scales need to be fully reviewed, additional indicators considered for application, multiple indicator use to provide fuller range of conceptual and practical areas covered by each attribute, etc.
  29. could be better defined. Would consider adding mechanical aptitude, logic

**General Aptitude:**

30. General learning ability - should have a broad category listed for e.g. 6th grade educ, 8th grade educ, 12th grade educ, assoc degree, bachelor's, and advanced degree.
31. General learning ability, define/add IQ levels

**Verbal Aptitude:**

**Numerical Aptitude:**

**Spatial Aptitude:**

**Form Perception:**

**Clerical Perception:****Motor Coordination:**

32. Motor coordination and dexterity have changed greatly in recent times due to all the use of computers and technology. Typing test and use of a mouse seem much more relevant in today's job market

**Finger Dexterity:**

33. the finger dexterity measure should be tied to keyboarding to some degree
34. define repetitive for manual and fine finger dexterity; and about keyboard functioning ability

**Manual Dexterity:**

35. Indicate that the manual dexterity level assumes BIMANUAL dexterity.

**Eye, Hand, Foot Coordination:****Color Discrimination:**

**Q6: Please provide your recommendations regarding inclusion of the current DOT Temperaments in the new OIS:**

**General:**

1. add psychological factors
2. Task are important, but need clearer definitions of temperaments
3. If behavioral and cognitive demands of jobs are considered, then most of these would be included in those categories.
4. The areas marked for modified may be lumped together and I don't really use these areas as I see these being used more in management areas and many of the position used for SSD or other industries are primarily in the semi skilled or unskilled area and really are not relevant to many of the occupations
5. ONET has a good list of behavioral/interpersonal traits. Work with those and reduce to a manageable number
6. The words "repetitive" and "stress" need to be better defined in vocationally relevant terms. One could also address a working definition of "rare or rarely." And, while I am attacking terminology, how about the concept of "twist."
7. This section needs to be enhanced for a clearer statement of work temperaments and adjustment.
8. I think that much of this is depending on individual personality and highly variable in application in the workplace. It's very difficult to predict how personality factors will play out - especially "stress" and "influencing" factors.

9. Add working with high workload demands requiring calm and uncontrolled overtime
10. I find that some of these areas are more helpful than others (repetitive tasks, working alone, dealing with people, judgments), but all would be helpful to have updated.
11. I think this can be broken down into a few different types of stress, e.g. productivity demands versus high volumes of work, etc.
12. better definitions are needed
13. This section could be greatly expanded to cover a lot of different behaviors that are relevant for people with psychiatric disabilities, brain injuries, Depression and PTSD.
14. develop instead a cognitive/emotional scale required for successful work in that job such as: need to understand & remember short simple directions, need to understand detailed instructions, etc
15. Repetitive - better definition - are these 1 -2 step tasks?
16. Alone - show a range of collaboration, teamwork required
17. Tolerances and under specific instruction - never knew what these meant
18. Again, this isn't simply a physical issues, but requires the inclusion of psychological as well as psychosocial concerns as well. Moreover, stress is a normal part of everyday life. Thus, it isn't really important to note whether an individual can perform "under stress" since essentially all people do. Stress is something that has become medicalized and is used all too frequently as a basis for perceiving as being unable to work. This is iatrogenic disability in the process
19. Again more detail as to how it applies to each job
20. Adding categories as typically seen on the SSA Mental RFC might be helpful, such as ability to concentrate, complete detailed work, etc.
21. Temperaments mean little in job evaluation. Can that be made more "REAL"?
22. Explanation of what degree of dealing, ( in depth, superficial, etc.)
23. Replace the present yes/no with a 5 point scale (0-4) indicating the importance of this temperament to occupational performance.
24. It would be VERY helpful if temperaments were rated using the not present, occ, freq, constant system.
25. Clearer definition of what type of repetitive tasks
26. Always lots of discussion about "public contact" versus working with people. Perhaps that could be expanded, like with co-workers, supervisors, etc.
27. Most of these characteristics are never considered in SSD hearings.
28. Need better definition of these items to clarify the values
29. Need to be more clearly defined
30. Variety of duties by specific industry designations allows better explanation based on type of work industry etc
31. These all need to be better clarified
32. More detail is needed

**Directing, Controlling, Planning:**

**Performing Repetitive Tasks:**

33. Types of repetitive tasks should be included and a specific definition of repetitive included

**Influencing People:**

34. Influencing = supervising people?
35. More clarification regarding influencing people

**Performing a Variety of Duties:****Expressing Personal Feelings:**

36. "Expressing personal feelings" should be changed to relate to job performance

**Working Alone:**

37. Working alone should be changed to working independently

**Performing Under Stress:**

38. Not sure of "working under stress." Stress level may be different for each person
39. Stress needs a better definition
40. Stress needs scaling & behavioral anchors
41. Stress - enhance to include work situations such as working under deadlines, mandatory overtime, travel, etc
42. Stress - better range of stress levels
43. Perform under stress - what constitutes stress? Define?"
44. Define levels of stress
45. Stress- explain what is stressful in the occupation
46. Stress needs to be defined. What is "stressful" to one is not to another. Is defined in the COJ
47. Performing under stress or deadlines
48. Perhaps a redefinition of Stress and addition of a Stress category as pertaining to production demands, probability of work burnout and similar.
49. Maybe we need two "stress categories. One to reflect "danger" as it is and one to reflect work stressors
50. Stress - Should be characterized & defined.
51. Work stress needs clarification and a more specific definition. All jobs should be rated regarding stress (ex, high, medium or low)
52. Define stress
53. Stress can mean a lot of things. We ALL work under some stress. More details required.
54. Greater need for enhanced definition of stress to include non life threatening situations which induce stress upon the average person
55. Performing under stress subjective mental conditions may be better category would better define stress, tolerances

**Attaining Tolerances:**

56. Attaining Tolerances is poorly defined. Most would think it is related to a precision measurement, but it is found in many occupational descriptions where someone is simply counting.
57. Tolerances - Should be characterized & defined

**Working Under Specific Instruction:**

58. Working under specific instruction - change to following directions

**Dealing With People:**

59. Dealing with people.... maybe interacting with people
60. Deal w/ people- clarify co-worker, supervisor, public; attain tolerance-clarify
61. people - show level of interaction with coworkers and supervisors as well as public
62. Dealing with people could be broken out to dealing with customers and others outside organization AND dealing with supervisors and co-workers. Or, this could be aligned with working independently

**Making Judgments and Decisions:**

63. Judgments - define the level

**Q7: Please provide your recommendations regarding inclusion of the current DOT Interests in the new OIS:**

**General:**

1. Again, need more user friendly, clearer definition
2. I have very limited use of this area.
- 3 include if the purpose of the OIS is for vocational planning
- 4 I do not use these
- 5 It should fit with the Holland system
- 6 Not sure that interests have any bearing on SSA eligibility
- 7 Although the option of "no opinion" is what I checked for several (that could also be better defined), I have a very strong opinion that these factors play a relatively small part in developing a job description. The exceptions might be "attention to detail" and "knowledge of selling techniques.
- 8 Allow adjustment based upon vocational testing.
- 9 expand by updating
- 10 Best left for interest inventory enthusiasts ...
- 11 This is not information that I typically use through the DOT. In my practice, personal interviews and interest inventories are helpful in working through this information.
- 12 Much prefer Holland's codes, plus those codes are already matched with DOT codes, plus has the advantage of having been tested and researched with good validity and reliability.

13. Artistic should be elaborated to mean creative expressions. For example, a web developer needs artistic ability.
14. Honestly, accommodating is really confusing to me and the definition is really vague.
15. I think the term industrial should go if you keep mechanical"
16. Industrial could be Technical
17. Humanitarian could be Service
18. Leading could be managing
19. Physical could be Outdoor
20. Should be redefined into occupational categories, such as business, sales, medical, mechanical, etc. or eliminate.
21. Use the Holland codes
22. These need to be aligned with the new Interest areas defined by the US Dept of Labor.
23. Not relevant
24. Good to mention but hard to establish as post injury interest
25. No opinion concerning these matters
26. Although we as VR specialists consider interests to be important, they are not considered in SSD or virtually any other fields relating to disability. Since this OIS is for SSD only, eliminate what is not necessary.
27. Interest categories are useful for career counseling; irrelevant for SSA.
28. Again still useful as they are
29. Substitute the Myers Briggs Type Indicator II
30. Not helpful for vocational expert work
31. Electronics
32. Not relevant to SSA ODAR
33. This is not significant in terms of assessing most jobs.
34. These appear to be superfluous data to a VE
35. These are more for matching/identifying interests. A claimant's interests are not considered when an ALJ formulates a decision
36. Again has no value for SSA.
37. Seems like accommodating and humanitarian could be combined.
38. This entire area (temperaments) needs to be reevaluated regarding not just theoretical, but practical/real world application to individual occupations and individuals career experiences, etc.
39. Add in Service
40. This is not needed for ODAR purposes
41. These are too broad. Would expand them, or use similar categories to those used in interest assessments (COPS, SDS, etc)

**Q8:** Please provide your recommendations regarding inclusion of the current DOT components in the new OIS:

**General:**

1. Retain the transferrable skills. Very helpful.

- 2 The activities that someone does (WF) with how someone does them (materials, processes, tools, technologies, etc.) need to be included in how the data is collected, not as generalized work activities.
- 3 ONET "Knowledge" categories work well
- 4 SOC especially
- 5 Include consideration of O'NET criteria. Database TSA's can be overly restrictive if limited to the traditional coding of Work Fields and MPSMS.
- 6 Expand to include information technology
- 7 Since the BLS OES data is based on SOC codes, Categorization of the new OIS should match to those codes to be able to better estimate the number of each job, the wages, and other data that DOL reports
8. This is simply too general. If there are going to be transferable skills, then why not use the broader based inclusion of physical and psychological/cognitive.
9. Bring Work Fields and MPSMS up to date. Make them reflect today's work activities and work objects.
10. With so many new and different jobs more information so all VE's can be uniform in making opinion.
11. I use the worker fields and the material, products, etc. for transferable occupations. .
- 12 made current
13. Will depend on how much the new system differs from the older, and whether those documents will be changed to new system.

**Crosswalks:**

14. Crosswalk to O\*Net, SIC codes
15. With fewer coding systems, there may be less need for crosswalks
16. Crosswalks are essential
17. Crosswalks are important for vocational advice more than for SSVE work.
18. Crosswalks always help when looking up jobs I am unfamiliar with

**Q9: Please provide your recommendations regarding inclusion of the current DOT Rating Scale choices in the new OIS:**

1. include "Rarely"
2. DOT uses % of time. Need to include consistent number of repetitions.
3. Scaling needs to be more granular so that it makes better sense in the person-work match.
4. The use of never should be replaced by Rare, it is very seldom that the word never should be used and it seems rather restricting to a persons abilities.
5. Seldom, meaning 1 to 10% of the time
6. Add infrequent for range between 0-10%
7. I believe we should add Rarely and Moderately and define them accordingly. Need to have a scale between Never and Occasionally, as well as between Occasionally and Frequently.
8. There should be an area where one could expound on the specifics of a disability/injury/illness and how that impacts on the job tasks, etc. AND how

the job tasks, etc. impact or may impact on the disease/injury/disability. For instance, one amputee is not another amputee-----it makes a big difference in looking at jobs depending on their level, function achieved, what kind of prosthetics their wearing, proper fit.....BIG ISSUE.

9. Never needs to be changed to 'rare' with a better definition i.e. 1% to 10%.
10. Please include Seldom as an in-between with Never and Occasionally.
11. Add additional level, e.g. Extra Time to address > 8 hours per day exposure to physical demands. Some physical therapists use the term Rare; however, that is really splitting hairs. Should add repetition ranges to supplement percent of day as that might be more relevant to stooping or other factors, e.g. 0 reps/hour for Never, 1-12 reps/hour for occasionally, 13-30 reps/hour for frequently, 31-60 reps per hour for constantly, and > 60 reps/hour for extra time. Could drop the "ly" at end of Occasionally, Frequently, and Constantly.
12. I recommend Seldom
13. The term "never" should mean not at all rather than a negligible amount. Occasionally meaning between 0-33 1/3 % of the time is, as the kids say, bogus. We need much better definitions of this type of function. If I go drinking 1% of the time, I am probably an upright and safe citizen. If I go drinking 33 % of the time, I am likely to earn a DUI or a lengthy prison sentence. What were those folks thinking when they originally defined "occasional"????
14. Improve accuracy. I.e. motel cleaner "never" has to bend or stoop if I recall correctly. There should be another category between never and occasionally as defined - perhaps a rating of "less than 10% of the day"
15. another category of "rarely" needs to be added
16. include number of times per day of lifting, if possible, rather than these categories. These categories work well for standing, sitting, etc., but not lifting, reaching, or grasping.
17. Never should be included but means NEVER. There should be another category of RARE which would be "once to 5%" and occasionally "5-33%"
18. It would be helpful to break up the percentages into smaller amounts, say 20% increments instead of 33% increments.
19. Specifically include "bending" as a physical demand. Consider a 0 to 10% "seldom" category for physical demands analysis to enhance the occasionally, frequent and continuous.
20. Include clarification of cumulative and intermittent vs. continuous (i.e. 2 hours continuously)
21. Some FCE's refer to a 5th designation - "rarely", which is defined as something less than 1/3 of the work day. The question comes up in hearings from time to time.
22. Never should be changed to infrequently.
23. These are vital, but should be defined by hours in an 8 hour day or percentage of an 8 hour day.
24. make more specific
25. add rarely <5%
26. needs more categories with shorter durations or frequencies

27. may want to add rare-up to 10%
28. Would much prefer a numerical or percentage of work day rating. I rarely go to the bathroom at work, I frequently go to Florida, although the frequency for either is much different. Scale used is misleading.
29. Get rid of current nomenclature because inexperienced personnel (such as treating MDs) have no concept of what occasional means other than everyday parlance- use specific measures of time
30. modify the whole ball of wax here
31. clarify that "constant" means "repetitive"
32. As long as they are defined (i.e., Occ = up to 1/3rd of the day, etc.)
33. Never is very difficult to use in the real world of work.
34. With each category defined with a % of time spent doing activity.
35. Add Rare
36. Should modify Occ to mean 11-33% and add Seldom (0-10%) because the occasional range is too large a range to describe some job functions that happen very seldom.
37. Recommend adding and providing a clear definition of RARE or Limited levels which current vary from 3% up to 10% of the time.
38. I would like to see some definition of repetitive
39. Tighten up on the definitions if these terms stay. Maybe add categories for intermittent/interchangeable or some other 'combo' term that may include any two or of the current choices.
40. difference between never and occasionally, as currently defined is too great - suggest having a category for "rarely" that would be less than 5% of the work day, for example
41. There must be another choice between never and occasionally. From Never to Occasionally (1/3 of a day) is a range absurdly large. Another choice such as "Rarely" for up to 5% would be helpful. Vocational people need to create that level in our work though the DOT lacks it
42. We need another category – seldom
43. These are actually quite meaningless in terms of responding. For example, what is the true objective difference between occasionally and frequently? How can this be quantified better?
44. need something more quantifiable - than thirds
45. include a new definition, "Rarely." This would be 0 to 10% of the day and Occasional should be >10% to <=33 1/3% of the day. Otherwise, it could easily be argued from the existing definition of Occasional that if one performs handling (for instance) 1% of the day, it is "occasional."
46. Add something less than occasionally.
47. Very Important
48. What do these terms really mean? Over the past twenty years they have been modified and re-defined by ALJ's ME's treating doctors, and VE's so many times it is difficult to go back to the original definitions without being challenged. Everyone has decided their definition is the "Right" one and that makes it difficult for VE's to provide consistent testimony.
49. Rarely instead of never or Rarely in addition to never

50. CLEARLY DEFINE IN TERMS OF CONSISTENCY, SCHEUDLED VS UNSCHEDULED, PERHAPS INCLUDE INTERMITTENT
51. I believe that there should be 1-2 categories added. One for "Rare use" of 5% or less. The occasional at 6-25%, Frequent at 25-50, another category 50-75 and then constant over 75%. The Frequent Category is too broad. consideration also needs to be made for rare activities.
52. Expand to add rarely (>5%)
53. My inclination is to eliminate the NEVER category as many of the "nevers" makes the person essentially bedridden or totally disabled. Occasionally could be used for 0-33%
54. occasionally covers such a broad range, would be helpful to break into two or more categories.
55. Provide explanation of more specific terms
56. Seldom should be included to interface with functional capacity assessments. It is defined as 1% to 5%. Occasionally would be 6% to 33%.
57. there needs to be something between occasional and frequent.
58. All three checked items should be better defined.
59. Include rarely
60. Modification to provide more detail
61. These are well established standards in the industry and changing these would only cause confusion in my perspective.
62. Plus include 'Infrequently'
63. Consider a category between occasional and never.
64. Should be improved from portions of work day to specific numbers of hours a task/activity is performed.
65. Do you want to add a category, RARE/SELDOM that includes the low end of Occasional, 5-10% of work day?
66. The range for frequent is too broad.
67. Again, the ranges are too wide. For example, the time difference between occasional and frequent is too great.
68. Hours per day? quantifiable definitions?
69. add or define better repetitive
70. This has its limitations but changing it would lead to more confusion. There is no way you can classify occupations in more specific terms and have it apply to the whole country.
71. Big controversy since each cover "up to" statements. Maybe break down further the categories to lessen the time intervals (e.g. 1%-33% is too broad)
72. I think that there needs to be one additional category here. There is too much of a gap between the occasional and frequent categories to fit most occupations well.
73. Consider changing never to "rarely"
74. Need to be better defined.
75. This must be with consistent industry standards.
76. "Better definitions not just percentages; employers often describe these functions as part of job but often have difficulty with % assigned to them

maybe scale such as 10%, 20% 30% of job etc". Perhaps adding a scale for rarely - i.e. may not occur more than 1 time/day or month, but is essential.

77. Add limited definition, (less than 1 hour).
78. Need to deal with not only overall duration and frequencies of occurrence, but on a more appropriate integrative basis, dealing with such issues as "cumulative trauma" and ergonomic concerns.

**Q 10: What new Occupational Preparation information is needed for the Social Security Administration OIS?**

1. Show that SVP is valuable if job proficiency was held,
2. Less than high school
3. Masters level
4. Unskilled,
5. Graduate/professional level training
6. The skill set rather than the degree
7. For what SSA is doing no occ prep info is needed
8. No training
9. Apprenticeship
10. Not needed. this pertains to hiring requirements not performance issues,
11. Poorly worded question - should be "which TO INCLUDE" in the OIS
12. These all should be tied in with SVP
13. Be sure to clarify "or reasonably equivalent experience
14. Post graduate degree would be sufficient beyond the Bachelor's degree
15. Industry certification ie HR certificate, A+ certification, first aid, medication administration certificate, CPR, teaching assistant certificate, not necessarily obtained at an Voc Tech school etc.
16. Years work experience
17. Preferred rather than required
18. Occupational preparation needs to be evaluated in depth. Most jobs state preference for degrees, then qualify that experience can be utilized instead. Would hate for this analysis to preclude entry level work due to preferences, not practice
19. Military training
20. "brief demonstration" = less than 30 day,
21. Professional Training - paralegal, RN,
22. This can't be done accurately
23. Certification/Licensure (if applicable),
24. Some are either degree and/or experience,
25. Eliminate this category as it is not needed
26. Related work experience, not necessarily OJT
27. Continuing Educational Requirements -- often as a result of State Licensure or National
28. Vocational or OJT training certifications,
29. SVP needs to be clarified,
30. Self taught info; Languages

**Q 11: What new Occupational Prerequisite information is needed for the Social Security Administration OIS?**

1. Salary earned
2. Amount of time of experience (PT, FT),
3. Length of experience would be reflected by SVP,
4. Familiarity with relevant industry
5. This gets tricky as often people can access a job with no experience and acquire and be able to learn and perform the job. I would hate to see something that states that a person cannot enter a particular entry level job unless they had experience. Otherwise, how would people ever become waitresses, store clerks, order fillers, etc.
6. Specific to particular disabilities/injury/illness---specialists,
7. Does participating in an educational program qualify as experience
8. Certifications, apprenticeship, Occupational, professional licenses
9. Type of experience which is beneficial (not needed),
10. Legal age requirements and eliminators such as felony convictions.
11. strength levels
12. prerequisite job titles,
13. Vision, Excessive Postural Requirement,
14. Development of new objective measurement/tools/techniques that are scientifically-based.
15. If a sit - stand option at work is provided,
16. Performance outcomes, did they really do this job or was this a special situation where they could not find a qualified person and settlement for someone not qualified.
17. Alternative experiences - not just one particular path,
18. Specific duties performed and the frequency of those duties,
19. Work at home opportunities in the industry
20. task-based skills
21. Interest ; Needs : Perhaps working part time is more desirable

**Q 12: What new SVP information is needed for the Social Security Administration OIS?**

1. This varies on demands of labor market. Need more accurate range
2. Time to proficiency (SVP) needs to be well studied in all dimensions that might result in any of these three, or something different.
3. SSA needs to be aware of previous achievements-to compare where the person is now. A 20 pt or % drop in IQ might not be much for a lower IQ,pre-inj.....but may be significant in pre-inj documented higher IQ
4. SVP is time to learn the job BUT there should also be the educational component stated
5. If no special training is required and the job can be learned on the job that needs to be reflected

6. SVP should be a combination of education and job experience.
7. SVP should be all of the above, with possible focus on what the mode of training is. like OJT, AA degree or experience + OJT etc
8. Include acceptable transferable skill attainment
9. Facility w/ English language
10. Average time to gain acceptable job performance is THE critical variable.
11. SVP should imply journey level status, education or experience.
12. SVP is a nightmare. The present system is difficult but how do you define what it takes to learn a job. Rather than change SVP give better examples so we can understand the differences between unskilled and semi-skilled and semi-skilled and skilled.
13. Consider how workplace methods impact on background (training and experience) needs, etc., as well as alternative ways by which effective training with appropriate outcomes can be made.
14. Separate what is needed to get job vs to be proficient in it
15. Still has to demonstrate "judgment" required for semi-skilled or skilled jobs.
16. Personal interest and choices

**Q 13: What new information related to Mental Demands is needed for the Social Security Administration OIS?**

1. Fatigue
2. DOT jobs assume good mental capabilities
3. -Executive function, problem solving  
-High, med, low executive functioning.
4. Use ONET descriptors
5. -This looks like a can of worms and would really need very good definitions. All jobs require some degree of concentration, persistence and pace. How will things be quantified. A little concentration, deep concentration, etc.  
-Additional detail can result in overly restrictive criteria for transferability or exclusion from own occupation
6. Cognitive endurance.
7. Adaptation
8. Language ability
9. 1-2 step jobs are virtually gone from the American economy;
10. -High, med, low interpersonal communication/interaction  
-Frequency/quantity of public contact, co-worker contact, supervisor contact
11. Ability to multi-task, ability to follow sequential instructions or steps,
12. Addition of definition for simple/repetitive; and time expected to learn job through demonstration & repetition.
13. These will need 'tight' definitions including maybe time frames i.e. occasional, frequent, etc. What about multiple step directions? I can't imagine how these factors will be defined! Would computer literacy fit in here somewhere? Would there be some type of a 'grid' that would demonstrate how these factors 'interact' to achieve occupational success? And/or at what level of 'absence' of these factors

- would an indiv be precluded from an occupation. Could these pls be called something else other than 'mental' demands?
14. Short and long term memory, not just memorization, reasoning, judgment, sincerity of testing effort, spatial organization, visuospatial analysis, learning, sensory acuity, attention and processing speed, ability to learn, abstract thinking, executive functioning, mood and temperament, objective assessment versus subjective perceptions/ verbalizations of impairment in functioning based on reported mental diagnosis, calculations, intelligence (pre-morbid and current), motor performance.
  15. Creativity and memorization may be difficult to measure
  16. Response to authority
  17. Most of the above can be deduced from the RML levels of the job, specifically Reasoning for complex vs simple , etc.
  18. As much information as possible about cognitive functioning, These are probably more important than aptitudes.
  19. Ability to handle interruption and regain focus.
  20. Initiation

**Q 14: What new information related to Personal Qualities is needed for the Social Security Administration OIS?**

1. -These are intangibles, not easily measured,,  
-All the above personal qualities all good to know, but it would appear they would be very difficult to quantify.
2. These should be eliminated as not used in real-life disability determinations.
3. How do you measure these on the job or with the individual to be able to include them in an OIS? These are best left to the qualitative analysis done by the rehabilitation counselor or vocational expert not in an OIS.
4. -"Attitude" would need further clarification, as would "Flexibility", cognition: plan, organize, direct, control.  
- Attitude: how to rate it: Good, Bad, indifferent???  
-The problem with some of these, like attitude....may be highly subjective.
5. Additional detail can result in overly restrictive criteria for transferability or exclusion from own occupation.
6. NONE ... this is highly variable and personality-dependent.
7. These are qualities all employers would like, I do not believe you can define based on job title. I believe that SVP and job tasks cover job demands. These are personal qualities desired and behaviors learned as a result of being in the world of work. How can these be measured?
8. Get along with co-workers, follow instructions, transfer knowledge to new or different departments or processes.
9. Too subjective. Who is going to evaluate? What employer is going to say efficiency and reliability and honesty and team are not required? Who will evaluate the job candidate for these qualities?
10. Time organization.

11. Detail oriented vs. quality oriented; ability to work alone; work with public; many factors above are judgment based and very challenging to measure or quantify.
12. Operational definitions needed, eg.: What attitude?
13. Perseverance
14. All need better - clearer and more definitive, more consistently understood operational definitions, etc., of each.
15. Security clearance
16. oral or written communication skills?
17. Problem solving, decision making, work with people
18. I checked frustration tolerance, but I don't think this is possible to identify in a particular job, as individuals have differing frustration tolerances, and it is as difficult to identify as "stress" as stress is relative and different tolerances for everyone. Plus, the other qualities are preferred by all employers, and VE's can assess which ones, such as communication skills, are actually required for the job.
19. Ability to meet deadlines, problem solving skills

**Q 15: What new SSA-related items are needed for the Social Security Administration OIS?**

1. There are often tasks that can be performed but are not recommended or may harm client.
2. Additional detail can result in overly restrictive criteria for transferability or exclusion from own occupation.
3. Ability to communicate in Spanish/Multilingual language requirements/
4. Read and understand directions written in English
5. These are covered in the current definitions, based on RHAJ and VE experience in analyzing jobs and placement. The job description itself covers what is done. It is up to the VE to understand the world of work and how it is performed. The current PD cover this.
6. WALKING
7. We need neck limitations and upper extremity guidelines too/Hands/fingers are attached to arms and potentially involve neck positioning.
8. Repetitive hand use should be quantified/ Repetitive hand/finger movement is already indicated in the handling & fingering requirements/Keyboarding
9. Simple routine should be separated from repetitive and repetitive an hand movement should be separate
10. Enhanced objective data pertaining to mental concerns that are in-line with current professional standards of evaluation of impairment of functioning. SSA does not currently do this and accepts minimal and subjective information as "proof" of impairment. Moreover, there isn't a requirement of assessment of symptom exaggeration and/or malingering.
11. Near and far vision are already covered - this is duplicative.
12. This is by far the most important info needed by SSA VE's
13. Voc. expert should interpret transferable skills
14. MET level will really complicate the SSA hearings/ MET level would not consider diseases such as MS

**Q 16: What new information related to Barriers to Employment are needed for the Social Security Administration OIS?**

1. Drug Medication side effects.
2. -Do not consider things that are functions of the workers choice, not a matter that cannot be changed
  - These are hireability issues
  - This is discriminatory and arbitrary. Employers make these decisions and there is
  - Always an interaction with other qualities. Not a disability determination need.
  - Like #14, most of these are intrinsic to the clinical qualitative part of the VE's analysis, not to the OIS for SSA purposes.
  - I am concerned about these. I think these can confuse employability with placeability.
  - None, employment is not the issue with SSA.
  - I'm not convinced that Barriers should be included. The list could be limitless and seems to be based substantially on judgment calls based on consideration/quantification of all the other factors.
  - Consideration of the criminal record will just further back up social security as while this may limit specific industries, it should not be a consideration regarding skills, or ability to work.
  - These are factors which should be addressed in counselors individual labor market surveys, no way you can address them on a national basis for all occupations, in my opinion.
  - Not all individuals with criminal records are the same, just as monocular vision varies with the individual.
  - If too subjective would not be possible to address and issue is not being hired but capacity to do work.
  - Additional detail can result in overly restrictive criteria for transferability or exclusion from own occupation
  - Way too specific to study in a constellation of jobs
3. Wouldn't adaptive devices be an aspect of MPSMS that could be tied to potential accommodations that are inherent in an occupation or across a group of occupations?
4. Cognition: plan, organize, direct, control
5. -Disease/illness/or injury/disability expected restrictions or complications.
  - The use of adaptive devices is not a barrier to employment, but a tool to improve functionality.
  - Reasonable accommodations/Adaptations necessary or possible.
  - In today's world if someone has a prosthetic device and they have proven effective at using it then it should be looked at as acceptable to due their job.
6. Child Care, Salary, Benefits.
7. Sex offender history.
8. Pre-existing restrictions/medical conditions.
9. One-handedness, blindness, deafness, psychiatric disabilities, Level of cognitive ability.
10. Driving Record/Driver's License.

11. Ability to interact with coworkers & supervisors in minimally est. standard.
12. Legal status to work in the United States
13. Assessment of poor work ethic and desire to work.
14. Obesity.
15. Lack of employment within the last (specify time) months/years.
16. Past drug use/abuse, ethical violations, loss of licensures or certifications, etc.
17. Security clearance.
18. Transportation issues.
19. Age
20. Primary language
21. Ability to take care of personal needs (bathroom related issues)

**Q 17: What changes or additions do you recommend to the Rating Scales? (check all that apply)**

1. Changing the ratings will require job analyses of the exemplars for groups of similar jobs and needs to be done by trained VRC's or CVE's
2. -Add Seldom or Rarely, defined as 1 to 10% of the time.  
     replace never with 'rare'.  
     -Add NEVER. Add RARE to be "once to 5%" making OCCASIONAL defined as "6-33%"  
     -I recommend infrequently, occasionally, frequently and continuous.  
     -Use a rarely rating for less than 10% of work day.  
     -Use of seldom which is 1% to 5% which moves occasionally to 6% to 33%. This would make the DOT in line with most functional capacity evaluation systems.  
     -Modify the rating scale to break the percentages into smaller categories based on 20% as opposed to 33%.  
     -As stated previously, define Rarely as  $\geq 0$  and  $\leq 10\%$  and Occasionally as  $> 10\%$  and  $\leq 33.3\%$   
     -"rarely" category would be good. But consider the diminishing returns by adding too many variables. We could end up arguing how many angels can dance on the head of a pin at hearings. I know attorneys who would love to engage in such sophistry.  
     -Consider either additional categories for never, occ, frequent and continuous, to have 1-2 more categories.
3. Determining the rating scales should be based on how the data falls once it is collected. Those decisions could be made through cut score analysis so they make the most sense to work as it is performed in the US labor market, not limited through a presupposition of how those ratings should cluster or fall.
4. sedentary, light, etc..... these have become meaningless
5. Jobs should be described in terms of what the task demands and productivity expectations are. This is what the ADA is all about. Describe what is required, not how it is done. Human capacities need to be measured in a realistic manner. -- Getting too technical and detailed isn't feasible as the medical/functional capacity community can't respond. Given the lack of reliability that exists for functional capacity estimates I am not sure how far you can go with this.

6. The ability to push/pull is generally much greater than lift/carry.
7. Additional detail can result in overly restrictive criteria for transferability or exclusion from own occupation. It is all in how these criteria are allowed to be used for understanding the potential job demands vs exclusion from opportunity.
8. Work with the FCE folks about what is measurable and explainable.
9. Body position and strength need to remain linked.
10. Push/Pull strength definition and rating factors would be nice.
11. -If you understand the definitions, there is no need to confuse or make them more rigid. Who is to say how many reps are occasional or frequent? The whole RHAJ would have to be rewritten. Unlinking may help clarify some job demands with some jobs.
  - Unlinking the body positions from the lifting requirements would effectively eliminate the primary difference between light, medium, heavy and very heavy. While this may work for voc rehab counselors, the medical world uses these categories of physical demand.
  - Eliminating light, medium, heavy and very heavy would create the situation where not only the voc rehab profession would change but the medical profession would be challenged to change...no small undertaking!
12. While I do believe that there should be definitions for what repetitive means, as well as occasional, etc..., I believe that you should keep it as simple as possible and avoid creating too many combinations for scenarios. I would encourage you to try to streamline the process versus make it more complicated. The current rating scale should be kept with definitions to the descriptors.
13. Alternating position frequency would also be helpful.
14. This takes much more thought than a quick checking of box. Needs a full sub committee discussion.
15. Keep the lifting rating scales of sed, light, med, hvy, very hvy but unlink them as mentioned above
16. Repetitive motion should be added.
17. I think this would be very helpful as often someone can do a job that allows for standing but cannot lift over 10 lbs.
18. Instead of portion of the day, should be number of hours per work day. reps would be too specific and tedious. hours would work well...it is specific enough to be very helpful and not too specific (reps) to get bogged down and make things more cumbersome than need be.
19. -Unlinking body positions from strength factor would be good as some light duty positions require minimal lifting but require considerable walking which places the occupation into Light PDL
  - I wouldn't unlink position from strength but would modify it to include frequency.
  - The unlinking of body position from the strength requirements is a big step and one that will help. Also, add in work categories that include 5 lbs. or less.
20. Rating scales should not be such that they provide an impression of a more precise measure, when they result in pretty much guessing on the part of the job analyst, etc., beware of "false impressions of precision" which do not mean or add anything to the process, etc.

**Q 18: The force levels for lifting and carrying should be adjusted in the descriptions for Strength physical demands levels. (e.g., application of the NIOSH revised lifting equation suggests that 40 lb. occasionally may be a more appropriate as an upper limit for Medium physical demands and that 70 lb. may be a more appropriate upper limit for Heavy physical demands.)**

1. As above, this is one area that could be studied. The decision of where it should fall (35#, 40#, 50#, other) should be considered in context of not only NIOSH, but also with how the data collected by the OIS indicates it should cluster.
2. There should also be a way to distinguish body habitus and gender for allocating RFC strength. A sixty year old woman or any woman should not be given a Medium or Heavy RFC
3. It is lifting, not the same as physical demands. just a subset
4. Again it may be specific to disease/injury, etc. Often overhand or underhand lifting is involved. Amputees can lift if off to side, but rather difficult if out in front where we lose proprioception input. Our population is getting less fit and because of safety there are fewer jobs that require occasional lifting in the range specified for HEAVY or VERY HEAVY physical demands. What a worker can lift frequently is a much higher percent of the occasional lift than 50%...probably closer to 70-75%.
5. Any changes in weight classifications must be backed up by updated job analyses to see where the breakdown of weights is occurring by occupation.
6. Seems more appropriate.
7. It is still highly dependent on the FREQUENCY that lifting is performed.
8. 70 lbs. seems to be a defining requirement for post office and FEDEX type jobs.
9. The NIOSH is good for understanding limits of human exertion and fitness for job; however changing the definition would not accomplish anything for SSA purposes. Leave as is.
10. I find that many job leads ask for a 50lb lifting ability. You rarely see 40lbs. I would keep the current descriptions and add a category for light/medium (30 or 35lbs) and perhaps medium/heavy, as these are restrictions that we are seeing endorsed by physicians.
11. I don't know enough about this. Just make sure it ties in with what doctors are used to selecting.
12. With technological advances, jobs are getting lighter, not heavier. What is the significant difference in 10 lbs (i.e. 40 for medium) This would cause too much adjustment and would not be reasonable to the American employer/employee without much benefit.
13. Arguments for both sides appear valid. By changing the system there would be more consistency in usage and between agencies. This would mean maybe ease of communication and understanding. On the other hand, it would require a new job analysis re-evaluating every job in the DOT to modify strength levels. IT would also require some time for all parties (ALJ, Attorney, ME, VE, treating source, etc. ) to make the change to a new system.
14. For the most part, agree but I'd like to see much more data on this point.
15. I would suggest consideration for light work to be increased to 25 lbs.

16. As technology improves so does the physical strength needed to perform jobs. Making this shift would have the effect of classifying jobs more toward the lower limits that doctors may release clients to. The problem is employers have little knowledge of these ratings and don't seem to care about adhering to them once established.
17. A five-gallon bucket of water or paint weighs around 40 lbs. which remains within the "medium" definition; likewise, a UPS driver is generally limited to lifting up to 75 lbs. which falls nicely within the "heavy" range. The same principle applies to airline check-in clerks, taxi drivers, etc.
18. it's really six-and-on-half-dozen-of-the-other, isn't it. What really needs to happen is that the DOT needs to be updated to be contemporary. NIOSH is not a vocational authority. If the jobs were all reevaluated, some eliminated, others added, it would be contemporary and then we would know if it was really 20, 50 or 100 or needed to be 30 60 an maybe 75???
19. But, how will this speed up the process or in fact change anything in VE testimony? We deal basically in the Sedentary and Light arena.
20. How were these levels determined? Do they reflect current scientifically derived measures, such as information that has been developed from human factors/ergonomic research? What about use of alternative methods of performing physical requirements of job tasks, more than 1 person involved in performance of a lift, etc.? Requirements should not exceed current labor standards (e.g. from state commissions on workplace safety, OSHA, and ergonomic/human factors research regarding lifting capacities, etc. Any exceeding of these "real" and "truer" standards should include alternatives used by worker(s) to perform physical tasks (e.g. use of forklift or multiple workers to perform lift of certain amounts, eg. lift of 75 lb object (which could be difficult to control due to dimensional characteristics, lack of places to grasp the package, etc.) by means of multiple workers assisting each other, use of lifting devices, other methods, etc.
21. Stay with standard definitions for strength demands as defined by the Classification of Jobs and other sources
22. You maybe able to include 75 lbs in medium considering the airlines and parcel services require 75 lifting capacity.
23. All industry would have to adapt to this or placing people on jobs at medium could result in more injuries. For example, I always hear in testimony that a nurse aide is Heavy to Very Heavy, when it is rated as Medium. It seems that the physical demands levels are appropriate, but some DOT titles need to be changed
24. Distinguish between left and right hand . A person may be limited with the right hand but can still lift 40 lbs using both hands.
25. As well as, frequency of lifting. For example, lifting 25lbs frequently or 10lbs occasionally. These are more frequent in the Medium and light exertions than the maximum lift.

**Q 22: Are there any other needs or gaps in information that you recommend for consideration?**

1. -More detail on handling reaching activities.

- Reaching overhead should be included.
- 2. Be mindful that jobs requires certain behaviors and people have limited capabilities based on age, impairments, intellectual ability and the like
- 3. -With reference to #21, the question could be whether a skill (learned behavior), or a complexity of skills, is competitive or non-competitive. What you call it becomes immaterial or moot. It's the work complexity and its elasticity in the competitive labor market that is at issue, not it's name. This best helps us examine how human capital transfers and migrates given interventions (or lack thereof) in someone's worklife.
  - RE: #21, perhaps current SVP1 jobs would be Unskilled and SVP2 jobs "Low-skilled."
  - Question 21 poses several interesting options. If you change SVP 1-2 to low unskilled then does 3 become semi-skilled and 4 advanced semi-skilled, and then for the skilled positions, would it be low-skilled, low semi-skilled skilled, skilled, advanced skilled? I guess my point is okay make some changes, but if we change the bottom end will we then not be expected to say there are equally as many levels of skilled and semi-skilled. IF this is the route taken, I can live with it if we are given enough details, specifications to be able to determine what belongs where. Note SVP 1 jobs should be entry level, minimal instruction, SVP 2 may have skills. Can there be a differentiation of the 2?
  - SVP 3 appears to be a misnomer when comparing occs that fall within this SVP...suggest 3 either be unskilled or be eliminated, with the jump from unskilled to semi at SVP4
  - unskilled work should include work that reflects the skills that students would generally leave high school with and can enter the labor market with no additional training. This now would include jobs with keyboarding skills and most if not all jobs at the SVP level.
  - I think we need to re-think the SVP's as many SVP 3 jobs are direct access jobs. Many SVP-3 jobs are really unskilled. These jobs should be included in the "low-skilled" work category.
  - I see many times that a claimant would be able to perform the occ of Security Guard/Gate Guard, non-commissioned (not carry weapon); but SVP is 3, semi-skilled, and unless he/she has worked in law enforcement before, doesn't have transferability to this job, which is really entry-level job. I have tried to use it for specific cases, explain to ALJ that the person has the judgment needed, the education, etc and is qualified for the job. But they want unskilled jobs or jobs which show transferability. SVP 3, yes, sometimes does require transferability, but not always. I wish SSA would recognize SVP as Entry-level, and rely on the VE to determine if transferability is not needed.
  - I believe that the base of low skilled jobs should include marginal SVP 3 jobs. Vocational professionals do not restrict placement of candidates to unskilled work when performing placement in the open labor market. Most SVP 3 jobs are direct entry and do not require any specialized background to perform. Employers readily hire individuals for SVP 3 jobs without a past work history in the occupation.
  - Numerous occupations with SVP/s of 3 and 4 should be considered "low skill"

4. -Reasonable accommodations have the capacity to mitigate many ratings as applied to the worker-job interface; so too for assistive technology.  
-Whether accommodations exist especially given computers, other equipment that allows performance of jobs
5. Refer to ERI data.
6. SSA and Medicare need to know if the prosthetics, adaptive aids, etc. that are reported, are, being used, if they improve function, accessibility, etc. Because, I'm finding that many amputees are being fit poorly, the prosthetist is paid, but no one checks with the amputee about fit, function, and improvement. the consumer should be surveyed.
7. We must make sure that the Aptitude Levels GVNSPQKFMEC are kept and updated as needed.
8. The system must clarify and acknowledge that these are not criteria for a determination of permanency as policy is for the restoration of employable capacity for SGA.
9. Reliability, dependability, stamina, tolerance.
10. -The impact of the computer and peripheral on all occupations. Increased reflection of the numerous service-industry occs. Better (and more specifically) reflect the supervisory and "first-line" manager job descriptions separate from the Master titles.  
-Update information by job analyses and expand the DOT to include new occupations, as well as eliminating obsolete occupations.  
-Technology must be included in the OIS job task. Computers and technology is the greatest disparity in DOT data.  
-Upgrade job descriptions that use computers. Computers were scarce in 1991.  
-Update jobs included to reflect jobs currently available in the marketplace and eliminate jobs that are not obsolete  
-Eliminate extinct occupations such as "cigar wrapper"  
-Delete the antiquated multiple job titles such as "waitress-first class dining car" etc.
11. Some unskilled jobs have an SVP of 3; I believe that SVP 3 is not necessarily "semi-skilled". I think that a definition of "entry level" would be more appropriate and defined as not needing previous skills to enter into job. Such as Security Guard...previous experience helpful, not required.
12. Provide detailed medical information, not check boxes.
13. -In reference to #19, there is a large gap between the vast number of positions in the DOT compared to the ONET. Somewhere in the middle would be helpful.  
-On item 19 be careful in defining "most commonly exist".  
- Re #19: I use the information to classify the claimant's work. I would need an alternative to use if the OIS did not include that claimant's occupation. However, I do think that it is a good idea to have those jobs commonly testified to by ssave's identified separately so that all ve's are "on the same page".  
-Regarding question 19, I agree if there were some way to group or generalize some of the less common jobs so that you can choose from those groups when coding a less common job and still have some of the needed info to describe that job.

14. Wage data associated with the occupation would be helpful.
15. Mental RFC needs adjusted - simple instruction matches Reasoning Level of 1 which limits occupations. Thus this matches grades 1-3 and everyone would require a payee if this is indeed true. Perhaps better wording on Reasoning level 2 should be implemented.
16. Unscheduled breaks - may be covered in here somewhere. Part-time v + full time. Pain/medication. Drivers license.
17. Maybe this whole process should be computerized given the enormous amount of factors and their interaction. Of course, if it's all computerized, there probably wouldn't be much need for VE's!
18. Make sure titles tie in to labor market data.
19. Skills should be more clearly defined in terms of what employers look for in a job applicant. This should include the knowledge as well as familiarity with tasks. A former carpet layer could make a good carpet sales person due to their knowledge and hands-on experience, but the Work Field and Materials-Product codes are very different for these two occupations.
20. There is no assessment of symptom exaggeration and/or malingering. The empirical literature has demonstrated a much higher level of symptom exaggeration (30-40%) in disability claims.
21. Standing needs addressed as a separate physical ability as opposed to be clumped in with Sedentary, Light, etc.
22. Identification of which jobs traditionally allow for sit /stand options is very important.
23. The whole issue of foreign born and non-English speaking persons.
24. RE # 20: beginning with a new data base for the most commonly occurring jobs may be a good starting point for this project. Although it would be great to have the data on all jobs, the cost and labor involved may be overwhelming to the point that the project becomes derailed.
25. -Regarding the MRFC: Provide logical functional definitions for mild, moderate (most important), and severe.
  - Operationally modify rating scales especially moderate levels in psychiatric assessments;
  - Mental Health factors play a big role in suitability for employment. These seem to become the main barriers to employment in the majority of the cases I have heard. Physical demands can be accommodated for but Mental Health disabilities are much more difficult to deal with from an employer's stand point.
26. Try to maintain the OIS as close to the present DOT as possible.
27. -Narrow the durational period for Frequently (1/3 rd to 2/3 rds is too wide)
  - A solid inclusion and definition of rare or prolonged.
28. The issues of claimant motivation and hireability.
29. Tons of these exist - agree with those aspects for consideration included in most recent IARP IODC report and others.
30. Requirements of neck and upper extremity limitations as well as psych/concentration etc.
31. Many jobs these days are combination jobs due to the economy. There is great specificity in machine operating positions in the dot, however, many of them

- require the same physical and mental demands and can be consolidated, but not to the point that Onet and OES consolidates them. However if they are to be consolidated, then they should be consistent with other data that is out there such as OES/bls data.
32. Job analyses should be conducted for all jobs by CRC's and compiled in updated DOT.
  33. I think that VEs should be able to rely on their experience in the labor market and not only on the DOT;
  34. As mentioned above, add Neck and Sit/Stand; Distinguish "Power" and "Simple" Grasp.

**Q 23: Do you have any final recommendations for information that should be included in an OIS to assist Social Security with adjudicating adult disability claims?**

1. Any revision should be capable of adding new or additional jobs as such are seen in greater numbers at ODAR hearings or eliminating jobs that are obsolete or occur only rarely in the Labor Market.
2. Is there any way to link the work history in the SSA SEQY/DEQY to the OIS?
3. Focus should be on worker abilities and not barriers and limitations.
4. There needs to be link from any new OIS to available labor market data, which means that a crosswalk back to OES data. The larger the number of job titles in the OIS, the more difficult this will be. Use ONET titles data as much as you can as it links back to OES, but make the descriptors of ONET jobs more "disability friendly".
5. Include incidence of jobs in national and regional economy. Define "significant numbers".
6. Use of enhanced criteria ought to address not only employability due to impairment but also criteria that may be addressed for restoration of employability.
7. -SSA should de-emphasize the notion that low SVP jobs are less stressful than higher SVP jobs. Stress is a personal reaction to personally relevant stimuli. A cardiac surgeon could be quite relaxed while doing heart surgery and stressed out on a bottle-capping line. -Unlink SVP with stress assumptions.
8. Definitely include the new mental/cognitive components you've suggested!
9. Develop a consistent rating scale for the factors so that 1 always equals lowest and the highest number always equals the greatest.
10. Again, I would be cautious about how much you add. Life and work are not that neatly compartmentalized.
11. It would be incredibly helpful to tie in or provide statistics as far as how many (estimated percentage) 'low-skill'/SVP 1-2 jobs are sedentary, light, etc... This is information that is at times difficult to come by and I believe would be a vital resource for SSA claims and vocational work in general.
12. Jobs that do not require English language such as housekeeper should be identified.

13. Bi-lateral hand twisting for manipulation limitations should be added.
14. Sit/Stand options in jobs, standing at will distinction would be helpful.
15. one arm vs. bi-lateral use
16. Overhead reaching verses front level reaching would help tremendously.
17. Concentration levels in jobs in alignment with psych RFC like pace or persistence.
18. Keep it simple. Some of the above lists can be pared down. Keep it objective. Really, how can a job be analyzed with some of this detail. More common sense instead of being overboard comprehensive.
19. 90+ percent of jobs are in 2500 titles . Use these most common titles.
20. Link the mental and physical RFC descriptors with the OIS-
21. Allow for input of job specific factors.
22. Better categorize the information to match that of SOC codes so we can use the DOL/BLS/OES data more efficiently and reliably.
23. TSA determination should be revised and based upon employer expectations.
24. Many people with mild mental retardation work in semi-skilled jobs such as a stocker at a grocery store (SVP-4) or a fast food cook (SVP-5- will someone pls tell me what make a fast food cook a skilled job?). According to the DOT, someone with less than borderline IQ could not perform these jobs or any other job based upon the percentages for the aptitude of General Learning. This needs to be changes as it does not reflect reality.
25. The inclusion of substantial and more comprehensive evaluation of mental concerns that are currently very poorly documented. The assessment of psychosocial issues that impede the person's willingness to stay in the workplace are essential.
26. May want to specify hearing requirements as they relate to frequency/decibel as well (many Deaf are gainfully employed and SSA is outdated)
27. Revisit current Light jobs that allow extensive sitting and minimal lifting/exertion and change those to Sedentary.
28. Identify which jobs allow for sit stand options
29. Better definitions for use of upper body limbs for reaching, handling, fingering, grasping
30. Shorten job descriptions, add code fields and make all code references "1 click" away. If I want to look at D-P-T that should be a "click" button and not require that I get out of what I am doing.
31. Updating descriptions to determine impact of changes in technology on how work is performed
32. -Information regarding industry absenteeism rates. When I testify I base this on experience and DOL absenteeism rates. It would be good if all VE's testify using similar available information.  
- It is probably important to define or address issues such as absenteeism and excessive breaks and how that affects full-time employment, as this is routinely used by ALJ's
33. Eliminate obsolete occupations, eg.: Dial Marker 729.684-018. State that many occupations are typically performed in conjunction with other occupations; the

- resulting hybrid job should be described at the highest exertion and skill levels of the occupations included.
34. Address the variability of tasks from one work setting to another, or one region to another, for the same job title. (ie. Is there much variability from one employer to another, or are all employment settings essentially requiring the same tasks. Restaurant manager would be an example of variety among employers.)
  35. Update the broad spectrum of occupations that exist today that have never been analyzed or updated
  36. Try as much as possible to list the skills associated with each occupational title.
  37. Current PRFCA ODAR form limits response to sit,stand/walk to about 6 hours in a 8 hour workday. Provide choice of 7 or 8hrs and separate standing from walking.
  38. The issues of claimant motivation ...and hireability
  39. Use of assistive technology to perform essential functions of job.
  40. Possibly consider a system that would interface with newer functional ways of looking at individual physical, mental, etc. capacities of persons to perform in diverse settings and on diverse tasks (such as the international classification on disability, aging, and functional abilities proposed and being implemented by the WHO, etc.
  41. accommodations.
  42. I think a key factor is not only what information is gathered but how easily can it be identified as a factor in a job. For example if "appearance" or "team player" (as mentioned as possible factors in barrier or mental requirements) would be subjective. Whatever the factors considered they need to be ones that majority could agree is a known definition and not open to subjective interpretation by VE's, judges, attorneys. etc.
  43. Many jobs in the current DOT have long descriptions of tasks, using hand tools, etc and are listed as unskilled. Compare them to similar jobs which are semiskilled or skilled. Some description of use of tools which makes them skilled? (Is it that everyone should know how to use a hammer and power drill?).
  44. A)Set up committees that have a working knowledge of the State or region they serve to identify industry bases (Kansas - Aircraft industry, Agriculture, etc).  
B)Identify the employers in the industry base.  
C) Identify the jobs (DOT'S) that support the industry base.  
D) Work with these industries to assess the job functions. Most major employers have very effective job descriptions, physical demands and realistic outlines of the performance of the jobs. Gather the existing data from these employers and you solve the 2 major problems. (How the job is performed, and how many of the jobs exist)  
E) Compile the data into a national job bank and you have a great data base for assessing all aspects of the testimony.

IARP OI DAP Survey July 2009 Final

<b>1. Please provide your recommendations regarding inclusion of the following DOT items in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Current coding system	<b>68.1% (235)</b>	4.3% (15)	20.3% (70)	7.2% (25)	345
Data, People, Things	<b>69.4% (243)</b>	7.4% (26)	12.3% (43)	10.9% (38)	350
Industry designation	<b>73.8% (256)</b>	4.9% (17)	13.3% (46)	8.1% (28)	347
Task statements	<b>77.6% (274)</b>	1.1% (4)	18.4% (65)	2.8% (10)	353
Alternative titles	<b>79.4% (277)</b>	2.0% (7)	12.9% (45)	5.7% (20)	349
"May" items	<b>63.1% (209)</b>	10.6% (35)	11.8% (39)	14.5% (48)	331
Physical strength requirement (S-L-M-H-VH)	<b>79.9% (282)</b>	0.0% (0)	19.8% (70)	0.3% (1)	353
SVP (Specific Vocational Preparation - one of three bases of transferable skills analysis)	<b>81.6% (284)</b>	0.6% (2)	16.7% (58)	1.1% (4)	348
If you believe one or more of these categories should be modified, please explain					131
<i>answered question</i>					<b>353</b>
<i>skipped question</i>					<b>0</b>

<b>2. Please provide your recommendations regarding inclusion of the current DOT General Education Development definitions in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Reasoning	<b>70.0% (243)</b>	2.0% (7)	21.0% (73)	6.9% (24)	347
Math	<b>73.2% (254)</b>	1.4% (5)	18.4% (64)	6.9% (24)	347
Language	<b>71.0% (245)</b>	1.7% (6)	20.6% (71)	6.7% (23)	345
If you believe one or more of these items should be modified, please explain.					75
<i>answered question</i>					<b>347</b>
<i>skipped question</i>					<b>6</b>

**3. Please provide your recommendations regarding inclusion of the current DOT Physical Demand elements in the new OIS:**

	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Climb	<b>87.7% (308)</b>	0.6% (2)	10.5% (37)	1.1% (4)	351
Balance	<b>88.8% (309)</b>	2.9% (10)	6.9% (24)	1.4% (5)	348
Stoop	<b>85.6% (298)</b>	2.0% (7)	11.5% (40)	0.9% (3)	348
Kneel	<b>92.5% (320)</b>	2.0% (7)	4.9% (17)	0.6% (2)	346
Crouch	<b>87.6% (305)</b>	3.2% (11)	7.8% (27)	1.4% (5)	348
Crawl	<b>90.2% (313)</b>	4.3% (15)	4.3% (15)	1.2% (4)	347
Reach	<b>74.0% (259)</b>	0.3% (1)	25.1% (88)	0.6% (2)	350
Handle	<b>83.9% (292)</b>	0.6% (2)	14.7% (51)	0.9% (3)	348
Finger	<b>84.6% (292)</b>	0.9% (3)	13.6% (47)	0.9% (3)	345
Feel	<b>82.8% (288)</b>	7.8% (27)	8.3% (29)	1.1% (4)	348
Talk	<b>87.9% (306)</b>	4.0% (14)	6.3% (22)	1.7% (6)	348
Taste/smell	<b>75.7% (256)</b>	13.9% (47)	5.9% (20)	4.4% (15)	338
Near acuity	<b>85.5% (294)</b>	2.0% (7)	9.9% (34)	2.6% (9)	344
Far acuity	<b>85.5% (296)</b>	2.3% (8)	9.5% (33)	2.6% (9)	346
Depth perception	<b>86.9% (299)</b>	2.9% (10)	7.8% (27)	2.3% (8)	344
Accommodation	<b>79.4% (273)</b>	6.7% (23)	8.4% (29)	5.5% (19)	344
Color vision	<b>83.7% (288)</b>	4.9% (17)	7.3% (25)	4.1% (14)	344
Field of vision	<b>84.8% (289)</b>	3.5% (12)	7.9% (27)	3.8% (13)	341
If you believe one or more of these items should be modified, please explain.					138
<b><i>answered question</i></b>					<b>351</b>
<b><i>skipped question</i></b>					<b>2</b>

**4. Please provide your recommendations regarding inclusion of the current DOT Environmental components in the new OIS:**

	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Exposure to weather	<b>86.6% (298)</b>	4.9% (17)	4.4% (15)	4.1% (14)	344
Extreme cold	<b>88.3% (303)</b>	2.0% (7)	6.1% (21)	3.5% (12)	343
Extreme heat	<b>88.3% (303)</b>	2.0% (7)	6.1% (21)	3.5% (12)	343
Wet and/or humid	<b>87.1% (298)</b>	4.4% (15)	4.7% (16)	3.8% (13)	342
Noise intensity level	<b>87.9% (298)</b>	2.7% (9)	5.3% (18)	4.1% (14)	339
Vibration	<b>88.0% (301)</b>	2.6% (9)	5.8% (20)	3.5% (12)	342
Atmospheric conditions	<b>74.1% (254)</b>	11.4% (39)	7.0% (24)	7.6% (26)	343
Proximity to moving mechanical parts	<b>88.1% (303)</b>	2.3% (8)	5.2% (18)	4.4% (15)	344
Exposure to electrical shock	<b>84.2% (288)</b>	6.4% (22)	5.0% (17)	4.4% (15)	342
Working in high exposed places	<b>87.1% (298)</b>	3.8% (13)	5.3% (18)	3.8% (13)	342
Exposure to radiation	<b>79.1% (272)</b>	8.7% (30)	5.8% (20)	6.4% (22)	344
Working with explosives	<b>77.8% (266)</b>	10.8% (37)	5.0% (17)	6.4% (22)	342
Exposure to toxic, caustic chemicals	<b>86.2% (294)</b>	2.6% (9)	7.3% (25)	3.8% (13)	341
If you believe one or more of these items should be modified, please explain					55
<b><i>answered question</i></b>					<b>345</b>
<b><i>skipped question</i></b>					<b>8</b>

<b>5. Please provide your recommendations regarding inclusion of the current DOT Aptitudes in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
General learning ability	<b>82.2% (281)</b>	4.1% (14)	9.9% (34)	3.8% (13)	342
Verbal aptitude	<b>82.2% (281)</b>	4.4% (15)	8.8% (30)	4.7% (16)	342
Numerical aptitude	<b>82.7% (283)</b>	4.1% (14)	8.8% (30)	4.4% (15)	342
Spatial aptitude	<b>79.0% (271)</b>	7.0% (24)	8.7% (30)	5.2% (18)	343
Form perception	<b>77.0% (264)</b>	8.7% (30)	9.0% (31)	5.2% (18)	343
Clerical perception	<b>78.6% (268)</b>	6.5% (22)	9.4% (32)	5.6% (19)	341
Motor coordination	<b>82.4% (281)</b>	5.3% (18)	7.9% (27)	4.4% (15)	341
Finger dexterity	<b>81.8% (279)</b>	4.4% (15)	9.4% (32)	4.4% (15)	341
Manual dexterity	<b>82.5% (282)</b>	4.1% (14)	9.1% (31)	4.4% (15)	342
Eye-hand-foot coordination	<b>81.8% (279)</b>	5.9% (20)	7.0% (24)	5.3% (18)	341
Color discrimination	<b>79.7% (271)</b>	7.4% (25)	6.8% (23)	6.2% (21)	340
If you believe one or more of these items should be modified, please explain					51
<b><i>answered question</i></b>					<b>343</b>
<b><i>skipped question</i></b>					<b>10</b>

<b>6. Please provide your recommendations regarding inclusion of the current DOT Temperaments in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Directing, controlling, planning	<b>81.2% (276)</b>	5.6% (19)	6.8% (23)	6.5% (22)	340
Performing repetitive tasks	<b>81.5% (277)</b>	4.1% (14)	9.1% (31)	5.3% (18)	340
Influencing people	<b>77.5% (262)</b>	7.1% (24)	9.2% (31)	6.2% (21)	338
Performing a variety of duties	<b>78.5% (266)</b>	6.5% (22)	8.6% (29)	6.5% (22)	339
Expressing personal feelings	<b>67.4% (229)</b>	13.8% (47)	10.0% (34)	8.8% (30)	340
Working alone	<b>80.9% (275)</b>	5.6% (19)	7.4% (25)	6.2% (21)	340
Performing under stress	<b>71.8% (245)</b>	5.9% (20)	16.7% (57)	5.6% (19)	341
Attaining tolerances	<b>73.2% (249)</b>	7.9% (27)	11.2% (38)	7.6% (26)	340
Working under specific instruction	<b>79.4% (269)</b>	6.5% (22)	8.0% (27)	6.2% (21)	339
Dealing with people	<b>79.4% (269)</b>	4.7% (16)	10.3% (35)	5.6% (19)	339
Making judgments and decisions	<b>83.4% (281)</b>	4.2% (14)	7.4% (25)	5.0% (17)	337
If you believe one or more of these items should be modified, please explain					71
<b><i>answered question</i></b>					<b>342</b>
<b><i>skipped question</i></b>					<b>11</b>

<b>7. Please provide your recommendations regarding inclusion of the current DOT Interests in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Artistic	<b>56.6% (193)</b>	17.3% (59)	5.6% (19)	20.5% (70)	341
Scientific	<b>56.9% (194)</b>	17.0% (58)	5.6% (19)	20.5% (70)	341
Protective	<b>55.7% (190)</b>	18.2% (62)	5.9% (20)	20.2% (69)	341
Mechanical	<b>57.9% (197)</b>	16.5% (56)	5.6% (19)	20.0% (68)	340
Industrial	<b>55.8% (191)</b>	17.8% (61)	6.4% (22)	19.9% (68)	342
Business detail	<b>56.2% (191)</b>	17.4% (59)	6.5% (22)	20.0% (68)	340
Selling	<b>57.8% (197)</b>	16.7% (57)	5.6% (19)	19.9% (68)	341
Accommodating	<b>53.7% (183)</b>	19.6% (67)	6.5% (22)	20.2% (69)	341
Humanitarian	<b>54.9% (186)</b>	18.6% (63)	5.9% (20)	20.6% (70)	339
Leading/influencing	<b>56.5% (192)</b>	17.1% (58)	5.9% (20)	20.6% (70)	340
Physical performing	<b>56.5% (191)</b>	18.0% (61)	5.6% (19)	19.8% (67)	338
If you believe one or more of these items should be modified, please explain					48
<b><i>answered question</i></b>					<b>344</b>
<b><i>skipped question</i></b>					<b>9</b>

<b>8. Please provide your recommendations regarding inclusion of the current DOT components in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Work fields (one of three bases of transferable skills analysis - e.g. teaching, health caring, printing, transporting)	<b>78.4% (268)</b>	7.0% (24)	6.7% (23)	7.9% (27)	342
Materials, products, subject matter, services (one of three bases of transferable skills analysis - e.g. aircraft and parts, architectural engineering, hotel services)	<b>76.0% (259)</b>	8.2% (28)	7.3% (25)	8.5% (29)	341
Crosswalks to other reference sources such as the GOE, SOC	<b>80.6% (275)</b>	5.3% (18)	5.6% (19)	8.5% (29)	341
If you believe one or more of these items should be modified, please explain					26
<b>answered question</b>					<b>344</b>
<b>skipped question</b>					<b>9</b>

<b>9. Please provide your recommendations regarding inclusion of the current DOT Rating Scale choices in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Never	<b>81.8% (279)</b>	1.8% (6)	13.8% (47)	2.6% (9)	341
Occasionally	<b>79.8% (272)</b>	1.2% (4)	16.7% (57)	2.3% (8)	341
Frequently	<b>82.7% (282)</b>	0.9% (3)	14.1% (48)	2.3% (8)	341
Constantly	<b>83.8% (285)</b>	1.2% (4)	12.6% (43)	2.4% (8)	340
If you believe one or more of these items should be modified, please explain					101
<b>answered question</b>					<b>343</b>
<b>skipped question</b>					<b>10</b>

**10. What new Occupational Preparation information is needed for the Social Security Administration OIS? (Check all that apply)**

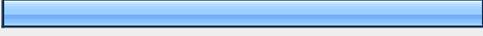
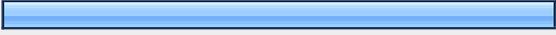
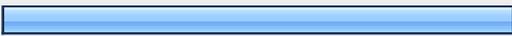
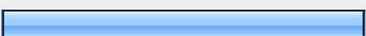
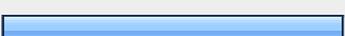
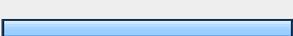
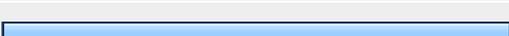
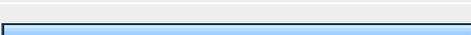
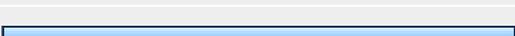
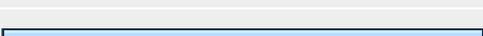
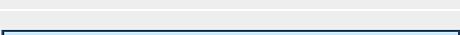
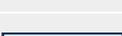
		Response Percent	Response Count
OJT		85.7%	258
<b>Vocational training</b>		<b>88.4%</b>	<b>266</b>
High School		83.1%	250
Associates degree		77.7%	234
Bachelors degree		75.7%	228
Doctoral degree		60.1%	181
Other (please specify)		26.9%	81
		<b>answered question</b>	<b>301</b>
		<b>skipped question</b>	<b>52</b>

**11. What new Occupational Prerequisite information is needed for the Social Security Administration OIS? (Check all that apply)**

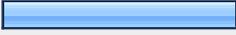
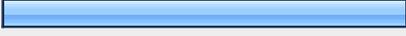
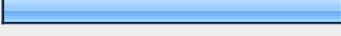
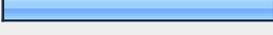
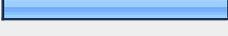
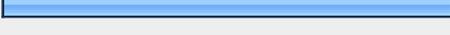
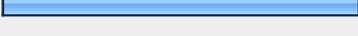
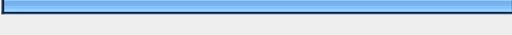
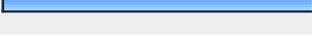
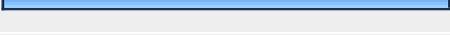
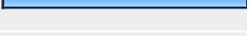
		Response Percent	Response Count
Type of experience needed		87.3%	247
<b>Length of experience</b>		<b>90.8%</b>	<b>257</b>
Other (please specify)		13.4%	38
		<b>answered question</b>	<b>283</b>
		<b>skipped question</b>	<b>70</b>

12. What new SVP information is needed for the Social Security Administration OIS? (Check all that apply)			
		Response Percent	Response Count
SVP should be tied to the level of education/training achieved		59.3%	182
SVP should be tied to the average length of time to learn the job		68.7%	211
<b>SVP should be tied to the average time to gain acceptable job performance</b>		<b>70.4%</b>	<b>216</b>
		Other (please specify)	30
		<b><i>answered question</i></b>	<b>307</b>
		<b><i>skipped question</i></b>	<b>46</b>

**13. What new information related to Mental Demands is needed for the Social Security Administration OIS? (Check all that apply)**

		<b>Response Percent</b>	<b>Response Count</b>
<b>Concentration</b>		<b>87.4%</b>	<b>271</b>
Persistence		74.5%	231
Pace		85.5%	265
Memorization		54.8%	170
Complex problem solving		79.0%	245
1-2 step directions		80.6%	250
Perceptual abilities		55.8%	173
Creativity		32.9%	102
Divided attention		52.6%	163
Response inhibition		36.1%	112
Selective attention		44.5%	138
Oral comprehension		78.4%	243
Oral expression		72.9%	226
Written comprehension		79.4%	246
Written expression		74.2%	230
Variability of tasks		70.6%	219
Other (please specify)		18.4%	57
		<b><i>answered question</i></b>	<b>310</b>
		<b><i>skipped question</i></b>	<b>43</b>

**14. What new information related to Personal Qualities is needed for the Social Security Administration OIS?  
(Check all that apply)**

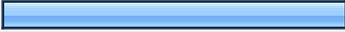
		<b>Response Percent</b>	<b>Response Count</b>
Attitude		43.1%	121
Leadership		49.5%	139
Tact		35.9%	101
Organization		62.3%	175
Frustration Tolerance		69.4%	195
Initiative		52.7%	148
Resourcefulness		41.6%	117
Honesty		34.5%	97
Flexibility		69.4%	195
Team orientation		54.8%	154
<b>Communication skills</b>		<b>79.0%</b>	<b>222</b>
Efficiency		48.0%	135
Reliability		69.0%	194
Quality orientation		37.7%	106
Other (please specify)		14.2%	40
		<b><i>answered question</i></b>	<b>281</b>
		<b><i>skipped question</i></b>	<b>72</b>

**15. What new SSA-related items are needed for the Social Security Administration OIS? (Check all that apply)**

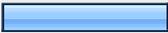
		<b>Response Percent</b>	<b>Response Count</b>
Simple, routine, repetitive tasks		91.1%	287
Level of literacy required		87.3%	275
Skills that transfer to other occupations		83.2%	262
One-handed		90.5%	285
Repetitive hand/finger movement		83.2%	262
Sitting work tolerance (rated using frequency scale)		90.5%	285
Standing work tolerance (rated using frequency scale)		91.4%	288
<b>Sit/stand option</b>		<b>94.9%</b>	<b>299</b>
Stamina (Rated as an aptitude or MET level)		57.8%	182
Different levels of reaching (above shoulder, at shoulder, waist-level, etc.)		86.0%	271
Technology skills		66.0%	208
Climbing agility (ramps, stairs, ladders, etc.)		64.1%	202
Neck movement/positioning (flexion, extension, twisting/turning head, length of time in each position)		82.2%	259
Hearing sensitivity (telephone, acute fine detail, near or far distance)		68.3%	215
Near vision acuity (computer screen, fine print, etc.)		72.1%	227
Far vision acuity (driving, etc)		68.6%	216
Productivity factors (production rate required, work at own pace,		79.4%	250

etc.)			
Work setting (factory, office, outdoors, freezer, etc.)		69.2%	218
Ability to communicate in English		74.0%	233
Other (please specify)		8.9%	28
	<b>answered question</b>		<b>315</b>
	<b>skipped question</b>		<b>38</b>

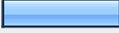
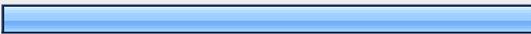
<b>16. What new information related to Barriers to Employment are needed for the Social Security Administration OIS? (Check all that apply)</b>			
		<b>Response Percent</b>	<b>Response Count</b>
Criminal Record		69.8%	194
Monocular Vision		63.7%	177
Personal Hygiene		39.2%	109
Appearance		38.5%	107
<b>Use of adaptive devices</b>		<b>76.3%</b>	<b>212</b>
Other (please specify)		19.1%	53
	<b>answered question</b>		<b>278</b>
	<b>skipped question</b>		<b>75</b>

17. What changes or additions do you recommend to the Rating Scales? (check all that apply)			
		Response Percent	Response Count
Maintain current rating scale of never, occasionally, frequently, and continuous		46.2%	145
Modify the DOT frequency rating scale for physical demands to specify repetition ranges in addition to percentage of time (e.g., 1-12 reps per hour for occasionally, 13-30 reps per hour for frequently, 31-60 reps per hour for continuously)		52.9%	166
Add a new level to the frequency scale for physical demands (e.g., working > 8 hours per day)		49.4%	155
<b>Unlink body position demands from the strength rating factor by limiting the strength definition to force requirements and rating the frequency of body positions such as sitting, standing, and operating foot controls as separate work tolerances (i.e., sedentary currently means sitting at least 6 hours in an 8-hour day and lifting up to 10 lbs. occasionally. Unlinking would have the requirement for sitting be separated from the requirement for lifting. )</b>		63.4%	199
Please comment on other improvements to the rating scales you would like to recommend			44
<b>answered question</b>			<b>314</b>
<b>skipped question</b>			<b>39</b>

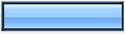
18. The force levels for lifting and carrying should be adjusted in the descriptions for Strength physical demands levels. (e.g., application of the NIOSH revised lifting equation suggests that 40 lb. occasionally may be a more appropriate as an upper limit for Medium physical demands and that 70 lb. may be a more appropriate upper limit for Heavy physical demands.)

		Response Percent	Response Count
Agree		75.0%	231
Disagree		25.0%	77
		Comments?	35
		<i>answered question</i>	<b>308</b>
		<i>skipped question</i>	<b>45</b>

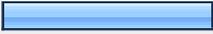
19. The OIDAP is questioning whether to include only those jobs that most commonly exist based on data from Social Security disability claimants and/or those jobs commonly testified to by Social Security Vocational Experts. Do you...?

		Response Percent	Response Count
Agree with this approach—include only most commonly encountered jobs in OIS		17.6%	57
Disagree with this approach—need to include all jobs in the current labor market in the OIS		82.4%	267
		<i>answered question</i>	<b>324</b>
		<i>skipped question</i>	<b>29</b>

**20. Would you agree with unlinking strength and body position factors (i.e., sedentary currently means sitting at least 6 hours in an 8-hour day and lifting up to 10 lbs. Unlinking would have the requirement for sitting be separated from the requirement for lifting.)**

		Response Percent	Response Count
Agree		81.7%	264
Disagree		18.3%	59
		<i>answered question</i>	323
		<i>skipped question</i>	30

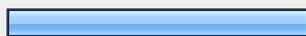
**21. Would you agree with changing “unskilled” work to “low-skilled” work, to acknowledge the fact that SVP 1 or SVP 2 jobs involve some degree of minimal skill to perform the work successfully? Do you...?**

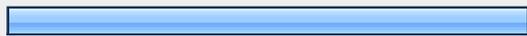
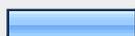
		Response Percent	Response Count
Agree		67.8%	221
Disagree		32.2%	105
		<i>answered question</i>	326
		<i>skipped question</i>	27

**22. Are there any other needs or gaps in information that you recommend for consideration?**

		Response Count
		75
		<i>answered question</i>
		75
		<i>skipped question</i>
		278

23. Do you have any final recommendations for information that should be included in an OIS to assist Social Security with adjudicating adult disability claims?		
		Response Count
		73
<i>answered question</i>		73
<i>skipped question</i>		280

24. Do you currently have a BPA with SSA?			
		Response Percent	Response Count
Yes		53.6%	177
No		46.4%	153
<i>answered question</i>			330
<i>skipped question</i>			23

25. Are you currently a member of IARP (International Association of Rehabilitation Professionals)?			
		Response Percent	Response Count
Yes		80.5%	265
No		19.5%	64
<i>answered question</i>			329
<i>skipped question</i>			24

IARP OI DAP Survey July 2009 Final

<b>1. Please provide your recommendations regarding inclusion of the following DOT items in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Current coding system	<b>70.5% (122)</b>	1.7% (3)	22.0% (38)	5.8% (10)	173
Data, People, Things	<b>74.4% (131)</b>	4.5% (8)	13.1% (23)	8.0% (14)	176
Industry designation	<b>75.0% (132)</b>	5.7% (10)	11.9% (21)	7.4% (13)	176
Task statements	<b>76.8% (136)</b>	1.7% (3)	19.8% (35)	1.7% (3)	177
Alternative titles	<b>80.7% (142)</b>	2.3% (4)	12.5% (22)	4.5% (8)	176
"May" items	<b>72.3% (120)</b>	9.0% (15)	10.8% (18)	7.8% (13)	166
Physical strength requirement (S-L-M-H-VH)	<b>76.8% (136)</b>	0.0% (0)	23.2% (41)	0.0% (0)	177
SVP (Specific Vocational Preparation - one of three bases of transferable skills analysis)	<b>79.2% (137)</b>	0.0% (0)	20.2% (35)	0.6% (1)	173
If you believe one or more of these categories should be modified, please explain					65
<b><i>answered question</i></b>					<b>177</b>
<b><i>skipped question</i></b>					<b>0</b>

<b>2. Please provide your recommendations regarding inclusion of the current DOT General Education Development definitions in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Reasoning	<b>66.5% (115)</b>	1.7% (3)	27.2% (47)	4.6% (8)	173
Math	<b>68.8% (119)</b>	1.2% (2)	26.0% (45)	4.0% (7)	173
Language	<b>65.1% (112)</b>	1.7% (3)	29.1% (50)	4.1% (7)	172
If you believe one or more of these items should be modified, please explain.					52
<b><i>answered question</i></b>					<b>173</b>
<b><i>skipped question</i></b>					<b>4</b>

**3. Please provide your recommendations regarding inclusion of the current DOT Physical Demand elements in the new OIS:**

	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Climb	<b>88.0% (154)</b>	1.1% (2)	9.7% (17)	1.1% (2)	175
Balance	<b>86.8% (151)</b>	5.2% (9)	6.9% (12)	1.1% (2)	174
Stoop	<b>86.1% (149)</b>	0.6% (1)	12.1% (21)	1.2% (2)	173
Kneel	<b>91.9% (158)</b>	3.5% (6)	4.1% (7)	0.6% (1)	172
Crouch	<b>89.0% (154)</b>	1.7% (3)	8.1% (14)	1.2% (2)	173
Crawl	<b>89.7% (156)</b>	6.3% (11)	3.4% (6)	0.6% (1)	174
Reach	<b>70.3% (123)</b>	0.6% (1)	28.6% (50)	0.6% (1)	175
Handle	<b>81.0% (141)</b>	0.0% (0)	18.4% (32)	0.6% (1)	174
Finger	<b>82.9% (145)</b>	0.0% (0)	16.6% (29)	0.6% (1)	175
Feel	<b>86.2% (150)</b>	6.3% (11)	6.9% (12)	0.6% (1)	174
Talk	<b>88.5% (154)</b>	2.9% (5)	6.3% (11)	2.3% (4)	174
Taste/smell	<b>79.2% (133)</b>	13.7% (23)	3.6% (6)	3.6% (6)	168
Near acuity	<b>85.5% (148)</b>	0.6% (1)	12.1% (21)	1.7% (3)	173
Far acuity	<b>86.3% (151)</b>	0.6% (1)	11.4% (20)	1.7% (3)	175
Depth perception	<b>88.4% (153)</b>	0.6% (1)	9.2% (16)	1.7% (3)	173
Accommodation	<b>80.9% (140)</b>	5.2% (9)	9.8% (17)	4.0% (7)	173
Color vision	<b>86.2% (150)</b>	3.4% (6)	7.5% (13)	2.9% (5)	174
Field of vision	<b>86.5% (148)</b>	1.8% (3)	8.8% (15)	2.9% (5)	171
If you believe one or more of these items should be modified, please explain.					77
<b><i>answered question</i></b>					<b>175</b>
<b><i>skipped question</i></b>					<b>2</b>

**4. Please provide your recommendations regarding inclusion of the current DOT Environmental components in the new OIS:**

	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Exposure to weather	<b>87.2% (150)</b>	4.7% (8)	3.5% (6)	4.7% (8)	172
Extreme cold	<b>88.9% (152)</b>	1.8% (3)	5.3% (9)	4.1% (7)	171
Extreme heat	<b>88.9% (152)</b>	1.8% (3)	5.3% (9)	4.1% (7)	171
Wet and/or humid	<b>90.1% (154)</b>	2.3% (4)	2.9% (5)	4.7% (8)	171
Noise intensity level	<b>88.2% (150)</b>	1.8% (3)	4.7% (8)	5.3% (9)	170
Vibration	<b>88.3% (151)</b>	2.9% (5)	4.7% (8)	4.1% (7)	171
Atmospheric conditions	<b>79.7% (137)</b>	7.0% (12)	5.2% (9)	8.1% (14)	172
Proximity to moving mechanical parts	<b>90.1% (155)</b>	0.0% (0)	4.1% (7)	5.8% (10)	172
Exposure to electrical shock	<b>86.5% (147)</b>	5.9% (10)	3.5% (6)	4.1% (7)	170
Working in high exposed places	<b>87.7% (150)</b>	4.1% (7)	4.1% (7)	4.1% (7)	171
Exposure to radiation	<b>79.7% (137)</b>	8.7% (15)	5.2% (9)	6.4% (11)	172
Working with explosives	<b>80.0% (136)</b>	10.6% (18)	3.5% (6)	5.9% (10)	170
Exposure to toxic, caustic chemicals	<b>87.1% (149)</b>	1.2% (2)	8.2% (14)	3.5% (6)	171
If you believe one or more of these items should be modified, please explain					31
<b><i>answered question</i></b>					<b>173</b>
<b><i>skipped question</i></b>					<b>4</b>

<b>5. Please provide your recommendations regarding inclusion of the current DOT Aptitudes in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
General learning ability	<b>79.2% (137)</b>	5.8% (10)	9.8% (17)	5.2% (9)	173
Verbal aptitude	<b>78.0% (135)</b>	6.4% (11)	9.8% (17)	5.8% (10)	173
Numerical aptitude	<b>79.2% (137)</b>	5.8% (10)	9.8% (17)	5.2% (9)	173
Spatial aptitude	<b>77.0% (134)</b>	8.0% (14)	8.6% (15)	6.3% (11)	174
Form perception	<b>75.9% (132)</b>	9.2% (16)	8.6% (15)	6.3% (11)	174
Clerical perception	<b>77.6% (135)</b>	8.0% (14)	8.0% (14)	6.3% (11)	174
Motor coordination	<b>79.2% (137)</b>	6.4% (11)	8.7% (15)	5.8% (10)	173
Finger dexterity	<b>78.5% (135)</b>	5.2% (9)	10.5% (18)	5.8% (10)	172
Manual dexterity	<b>78.6% (136)</b>	5.2% (9)	10.4% (18)	5.8% (10)	173
Eye-hand-foot coordination	<b>78.5% (135)</b>	6.4% (11)	7.6% (13)	7.6% (13)	172
Color discrimination	<b>78.9% (135)</b>	7.0% (12)	6.4% (11)	7.6% (13)	171
If you believe one or more of these items should be modified, please explain					28
<b><i>answered question</i></b>					<b>174</b>
<b><i>skipped question</i></b>					<b>3</b>

<b>6. Please provide your recommendations regarding inclusion of the current DOT Temperaments in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Directing, controlling, planning	<b>81.9% (140)</b>	7.6% (13)	4.7% (8)	5.8% (10)	171
Performing repetitive tasks	<b>82.5% (141)</b>	4.7% (8)	7.6% (13)	5.3% (9)	171
Influencing people	<b>79.4% (135)</b>	8.8% (15)	5.9% (10)	5.9% (10)	170
Performing a variety of duties	<b>80.0% (136)</b>	6.5% (11)	5.9% (10)	7.6% (13)	170
Expressing personal feelings	<b>71.5% (123)</b>	11.6% (20)	8.1% (14)	8.7% (15)	172
Working alone	<b>81.4% (140)</b>	6.4% (11)	6.4% (11)	5.8% (10)	172
Performing under stress	<b>70.3% (121)</b>	6.4% (11)	18.0% (31)	5.2% (9)	172
Attaining tolerances	<b>75.0% (129)</b>	7.6% (13)	9.9% (17)	7.6% (13)	172
Working under specific instruction	<b>78.2% (133)</b>	7.6% (13)	7.1% (12)	7.1% (12)	170
Dealing with people	<b>79.5% (136)</b>	4.7% (8)	10.5% (18)	5.3% (9)	171
Making judgments and decisions	<b>83.5% (142)</b>	4.7% (8)	7.1% (12)	4.7% (8)	170
If you believe one or more of these items should be modified, please explain					39
<b><i>answered question</i></b>					<b>173</b>
<b><i>skipped question</i></b>					<b>4</b>

<b>7. Please provide your recommendations regarding inclusion of the current DOT Interests in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Artistic	<b>54.1% (93)</b>	19.8% (34)	4.7% (8)	21.5% (37)	172
Scientific	<b>54.1% (93)</b>	19.2% (33)	5.2% (9)	21.5% (37)	172
Protective	<b>54.7% (94)</b>	19.8% (34)	4.7% (8)	20.9% (36)	172
Mechanical	<b>55.6% (95)</b>	18.7% (32)	4.7% (8)	21.1% (36)	171
Industrial	<b>54.9% (95)</b>	19.7% (34)	4.6% (8)	20.8% (36)	173
Business detail	<b>55.2% (95)</b>	19.2% (33)	5.2% (9)	20.3% (35)	172
Selling	<b>54.7% (94)</b>	19.2% (33)	5.2% (9)	20.9% (36)	172
Accommodating	<b>52.9% (91)</b>	20.9% (36)	5.8% (10)	20.3% (35)	172
Humanitarian	<b>53.8% (92)</b>	20.5% (35)	5.3% (9)	20.5% (35)	171
Leading/influencing	<b>55.2% (95)</b>	19.2% (33)	4.7% (8)	20.9% (36)	172
Physical performing	<b>54.7% (94)</b>	20.3% (35)	4.7% (8)	20.3% (35)	172
If you believe one or more of these items should be modified, please explain					30
<b><i>answered question</i></b>					<b>173</b>
<b><i>skipped question</i></b>					<b>4</b>

<b>8. Please provide your recommendations regarding inclusion of the current DOT components in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Work fields (one of three bases of transferable skills analysis - e.g. teaching, health caring, printing, transporting)	<b>75.4% (129)</b>	7.6% (13)	7.6% (13)	9.4% (16)	171
Materials, products, subject matter, services (one of three bases of transferable skills analysis - e.g. aircraft and parts, architectural engineering, hotel services)	<b>74.9% (128)</b>	8.2% (14)	7.0% (12)	9.9% (17)	171
Crosswalks to other reference sources such as the GOE, SOC	<b>77.1% (131)</b>	5.3% (9)	7.6% (13)	10.0% (17)	170
If you believe one or more of these items should be modified, please explain					16
<i>answered question</i>					<b>172</b>
<i>skipped question</i>					<b>5</b>

<b>9. Please provide your recommendations regarding inclusion of the current DOT Rating Scale choices in the new OIS:</b>					
	<b>Retain</b>	<b>Eliminate</b>	<b>Modify</b>	<b>No Opinion</b>	<b>Response Count</b>
Never	<b>81.3% (139)</b>	2.3% (4)	11.7% (20)	4.7% (8)	171
Occasionally	<b>76.7% (132)</b>	1.2% (2)	18.0% (31)	4.1% (7)	172
Frequently	<b>80.7% (138)</b>	1.2% (2)	14.0% (24)	4.1% (7)	171
Constantly	<b>83.0% (142)</b>	1.2% (2)	11.7% (20)	4.1% (7)	171
If you believe one or more of these items should be modified, please explain					56
<i>answered question</i>					<b>173</b>
<i>skipped question</i>					<b>4</b>

**10. What new Occupational Preparation information is needed for the Social Security Administration OIS? (Check all that apply)**

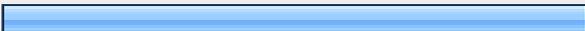
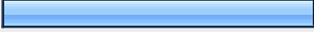
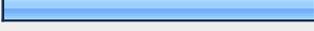
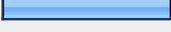
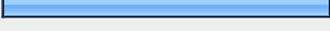
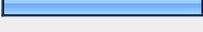
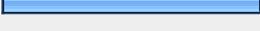
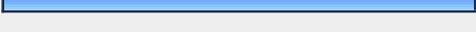
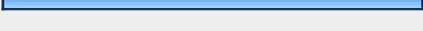
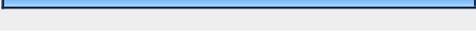
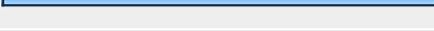
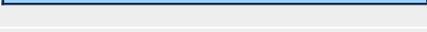
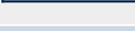
		Response Percent	Response Count
OJT		80.3%	126
<b>Vocational training</b>		<b>84.7%</b>	<b>133</b>
High School		81.5%	128
Associates degree		73.2%	115
Bachelors degree		70.7%	111
Doctoral degree		54.8%	86
Other (please specify)		28.0%	44
		<b>answered question</b>	<b>157</b>
		<b>skipped question</b>	<b>20</b>

**11. What new Occupational Prerequisite information is needed for the Social Security Administration OIS? (Check all that apply)**

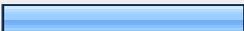
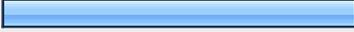
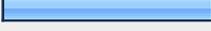
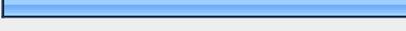
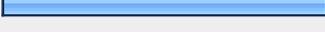
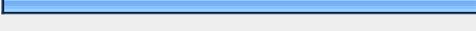
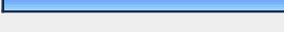
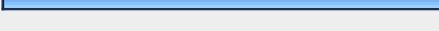
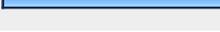
		Response Percent	Response Count
Type of experience needed		85.8%	121
<b>Length of experience</b>		<b>90.8%</b>	<b>128</b>
Other (please specify)		14.2%	20
		<b>answered question</b>	<b>141</b>
		<b>skipped question</b>	<b>36</b>

12. What new SVP information is needed for the Social Security Administration OIS? (Check all that apply)			
		Response Percent	Response Count
SVP should be tied to the level of education/training achieved		50.3%	84
SVP should be tied to the average length of time to learn the job		67.7%	113
<b>SVP should be tied to the average time to gain acceptable job performance</b>		<b>70.1%</b>	<b>117</b>
Other (please specify)			18
<b>answered question</b>			<b>167</b>
<b>skipped question</b>			<b>10</b>

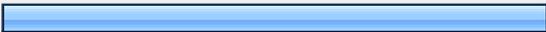
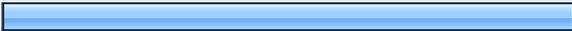
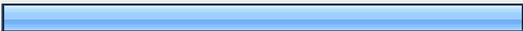
**13. What new information related to Mental Demands is needed for the Social Security Administration OIS? (Check all that apply)**

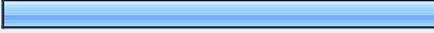
		<b>Response Percent</b>	<b>Response Count</b>
Concentration		90.4%	151
Persistence		86.2%	144
<b>Pace</b>		<b>92.8%</b>	<b>155</b>
Memorization		47.9%	80
Complex problem solving		74.3%	124
1-2 step directions		84.4%	141
Perceptual abilities		48.5%	81
Creativity		25.7%	43
Divided attention		50.3%	84
Response inhibition		30.5%	51
Selective attention		39.5%	66
Oral comprehension		73.1%	122
Oral expression		64.7%	108
Written comprehension		73.1%	122
Written expression		67.1%	112
Variability of tasks		65.9%	110
Other (please specify)		20.4%	34
		<b><i>answered question</i></b>	<b>167</b>
		<b><i>skipped question</i></b>	<b>10</b>

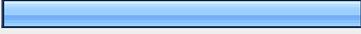
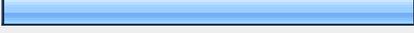
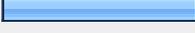
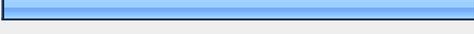
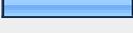
**14. What new information related to Personal Qualities is needed for the Social Security Administration OIS?  
(Check all that apply)**

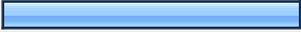
		<b>Response Percent</b>	<b>Response Count</b>
Attitude		37.2%	55
Leadership		41.2%	61
Tact		31.1%	46
Organization		54.7%	81
Frustration Tolerance		70.9%	105
Initiative		45.3%	67
Resourcefulness		32.4%	48
Honesty		28.4%	42
Flexibility		62.8%	93
Team orientation		50.0%	74
<b>Communication skills</b>		<b>73.6%</b>	<b>109</b>
Efficiency		43.9%	65
Reliability		68.2%	101
Quality orientation		33.8%	50
Other (please specify)		14.9%	22
		<b><i>answered question</i></b>	<b>148</b>
		<b><i>skipped question</i></b>	<b>29</b>

**15. What new SSA-related items are needed for the Social Security Administration OIS? (Check all that apply)**

		<b>Response Percent</b>	<b>Response Count</b>
Simple, routine, repetitive tasks		93.5%	159
Level of literacy required		84.1%	143
Skills that transfer to other occupations		80.6%	137
One-handed		91.2%	155
Repetitive hand/finger movement		82.4%	140
Sitting work tolerance (rated using frequency scale)		87.1%	148
Standing work tolerance (rated using frequency scale)		88.2%	150
<b>Sit/stand option</b>		<b>96.5%</b>	<b>164</b>
Stamina (Rated as an aptitude or MET level)		50.6%	86
Different levels of reaching (above shoulder, at shoulder, waist-level, etc.)		83.5%	142
Technology skills		56.5%	96
Climbing agility (ramps, stairs, ladders, etc.)		54.1%	92
Neck movement/positioning (flexion, extension, twisting/turning head, length of time in each position)		80.6%	137
Hearing sensitivity (telephone, acute fine detail, near or far distance)		61.8%	105
Near vision acuity (computer screen, fine print, etc.)		67.1%	114
Far vision acuity (driving, etc)		61.8%	105
Productivity factors (production rate required, work at own pace,		82.4%	140

etc.)			
Work setting (factory, office, outdoors, freezer, etc.)		62.9%	107
Ability to communicate in English		67.1%	114
Other (please specify)		8.8%	15
	<b>answered question</b>		<b>170</b>
	<b>skipped question</b>		<b>7</b>

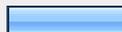
<b>16. What new information related to Barriers to Employment are needed for the Social Security Administration OIS? (Check all that apply)</b>			
		<b>Response Percent</b>	<b>Response Count</b>
Criminal Record		55.6%	75
Monocular Vision		63.7%	86
Personal Hygiene		34.8%	47
Appearance		29.6%	40
<b>Use of adaptive devices</b>		<b>73.3%</b>	<b>99</b>
Other (please specify)		20.0%	27
	<b>answered question</b>		<b>135</b>
	<b>skipped question</b>		<b>42</b>

17. What changes or additions do you recommend to the Rating Scales? (check all that apply)			
		Response Percent	Response Count
Maintain current rating scale of never, occasionally, frequently, and continuous		44.6%	74
Modify the DOT frequency rating scale for physical demands to specify repetition ranges in addition to percentage of time (e.g., 1-12 reps per hour for occasionally, 13-30 reps per hour for frequently, 31-60 reps per hour for continuously)		45.8%	76
Add a new level to the frequency scale for physical demands (e.g., working > 8 hours per day)		41.0%	68
<b>Unlink body position demands from the strength rating factor by limiting the strength definition to force requirements and rating the frequency of body positions such as sitting, standing, and operating foot controls as separate work tolerances (i.e., sedentary currently means sitting at least 6 hours in an 8-hour day and lifting up to 10 lbs. occasionally. Unlinking would have the requirement for sitting be separated from the requirement for lifting. )</b>		63.3%	105
Please comment on other improvements to the rating scales you would like to recommend			23
<b>answered question</b>			<b>166</b>
<b>skipped question</b>			<b>11</b>

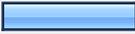
18. The force levels for lifting and carrying should be adjusted in the descriptions for Strength physical demands levels. (e.g., application of the NIOSH revised lifting equation suggests that 40 lb. occasionally may be a more appropriate as an upper limit for Medium physical demands and that 70 lb. may be a more appropriate upper limit for Heavy physical demands.)

		Response Percent	Response Count
Agree		72.2%	117
Disagree		27.8%	45
		Comments?	20
		<i>answered question</i>	<b>162</b>
		<i>skipped question</i>	<b>15</b>

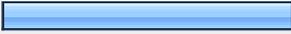
19. The OIDAP is questioning whether to include only those jobs that most commonly exist based on data from Social Security disability claimants and/or those jobs commonly testified to by Social Security Vocational Experts. Do you...?

		Response Percent	Response Count
Agree with this approach—include only most commonly encountered jobs in OIS		17.9%	31
Disagree with this approach—need to include all jobs in the current labor market in the OIS		82.1%	142
		<i>answered question</i>	<b>173</b>
		<i>skipped question</i>	<b>4</b>

**20. Would you agree with unlinking strength and body position factors (i.e., sedentary currently means sitting at least 6 hours in an 8-hour day and lifting up to 10 lbs. Unlinking would have the requirement for sitting be separated from the requirement for lifting.)**

		Response Percent	Response Count
Agree		79.8%	138
Disagree		20.2%	35
		<i>answered question</i>	173
		<i>skipped question</i>	4

**21. Would you agree with changing “unskilled” work to “low-skilled” work, to acknowledge the fact that SVP 1 or SVP 2 jobs involve some degree of minimal skill to perform the work successfully? Do you...?**

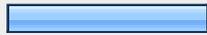
		Response Percent	Response Count
Agree		55.5%	96
Disagree		44.5%	77
		<i>answered question</i>	173
		<i>skipped question</i>	4

**22. Are there any other needs or gaps in information that you recommend for consideration?**

		Response Count
		45
		<i>answered question</i>
		45
		<i>skipped question</i>
		132

23. Do you have any final recommendations for information that should be included in an OIS to assist Social Security with adjudicating adult disability claims?		
		Response Count
		50
<i>answered question</i>		<b>50</b>
<i>skipped question</i>		127

24. Do you currently have a BPA with SSA?			
		Response Percent	Response Count
Yes		100.0%	177
No		0.0%	0
<i>answered question</i>			<b>177</b>
<i>skipped question</i>			0

25. Are you currently a member of IARP (International Association of Rehabilitation Professionals)?			
		Response Percent	Response Count
Yes		69.3%	122
No		30.7%	54
<i>answered question</i>			<b>176</b>
<i>skipped question</i>			1

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**NATIONAL ASSOCIATION OF  
DISABILITY EXAMINERS  
(NADE)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**Vocational Presentation by NADE**  
**Georgina B. Huskey**  
**June 10, 2009**

**Status of Current DOT and Why A New DOT is Needed**

- Current DOT designed by Department of Labor for THEIR purposes, not SSA's. SSA adopted this tool for use in disability adjudication. While not necessarily a case of trying to fit a square peg into a round hole, it often proved almost as difficult for Disability Examiners in its daily use. And that was when the DOT was current!
- Last revision to current DOT is nearly 20 years old.
- How have jobs changed in the past 20 years? How many new jobs have appeared in the past 20 years? How many jobs have become obsolete in the past 20 years?
- Current DOT is very much obsolete.

**Most DDS Decisions Are Based On Medical AND Vocational Factors**

- 3 million initial claims expected to be processed by DDSs in 2009
- 1 million reconsideration claims expected to be filed in 2009
- Approximately 75% or **3 million decisions** of these 4 million will consider vocational factors in the final determination.
- The DDS goal is to make an accurate decision on every case.
- Relying on an obsolete DOT makes accuracy problematic. It does not make it impossible but it does require more work for Disability Examiners and DDS Vocational Specialists to address such issues as whether the claimant can return to past work or whether the claimant possesses job skills transferable to other work.
- Automation has changed the way most production jobs are performed, making many of these jobs less skilled than before and requiring less exertion than before. Many jobs, such as fast food restaurant cashier, require little thought. Today's cash registers do not require the clerk to enter prices or compute change – the machine does it for them. On the other hand, these jobs are performed in high stress environments not acknowledged by the current DOT.

## Current Issues/Gaps Involving Occupational Information

- Medical/vocational analysis of claims is challenging when there is conflicting vocational information on the SSA-3368 vs SSA-3369. A claim could be erroneously denied if the Disability Examiner uses misinformation listed in Section 3 (Information About Your Work) on the SSA-3368. When a 3369 is obtained, the detailed information on that form often conflicts with the more limited information provided on the 3368. A potential resolution to this issue may reside in deleting section 3 from the 3368 and relying solely on the 3369 (and/or contact with the claimant).
- An example of a gap that currently exists between the occupational information in the DOT and SCO include the lack of rating of such activities as pushing/pulling and definitive guidelines regarding the type of reaching jobs require. Jobs are coded in the SCO for 'reaching,' however, if the claimant is limited from only *overhead reaching*, unless that activity is apparent in the DOT job description, the claimant must be contacted to determine what type of reaching (including how frequently, with one/both extremities, for what job duties, etc.). This additional step may be eliminated in some cases if the job coding was more definitive.
- Another gap in the coding of jobs in the DOT is that it is left to the judgment of the Disability Examiner (many of whom today are very inexperienced and all of whom are overworked) to realize a job could involve exposure to a non-exertional factor such as an environmental condition that is coded as 'not present' in the SCO. An example is the job of Yarn Winder (681.685-154). This type of work can expose the worker to excessive flying particles (lint, dust particles, etc.) but coding in the SCO under 'Environmental Condition Factors' indicates 'Atmospheric Conditions' are 'not present.'

When they devised the SCO, the Department of Labor rated non-exertional factors only when the "activities are critical, i.e., when their presence is more than routine in amount," or "when present to a considerable degree." However, it would be inappropriate to deny a claimant back to the job of a yarn winder if s(he) has a severe respiratory impairment on the basis that 'Atmospheric Conditions' were coded in the SCO as 'not present.' The same holds true for the claimant with a severe respiratory impairment whose past work was that of Cleaner, Housekeeping (323.687-014) or Cleaner, Hospital (323.687-010). Neither job is coded in the SCO as involving exposure to 'Atmospheric Conditions.' While exposure to fumes/odors from industrial chemicals used in the cleaning process may not be detrimental to the *unimpaired* worker, an individual whose respiratory ability is already compromised would be at further risk if consistently exposed to such irritants.

The category of 'hazards' (included under a number of categories under 'Environmental Condition Factors,' the most common of which appear to be,

‘Proximity to Moving Mechanical Parts,’ and ‘Other Environmental Conditions’) is another non-exertional factor that is coded as ‘not present’ in many jobs that would be hazardous to an *impaired* individual.

**We think the requisite issue here is that more definitive coding of these non-exertional factors would be beneficial in any future occupational information system – especially when analyzing job performance by *impaired* individuals.**

- Another issue regarding coding of non-exertional factors would be to make the coding consistent with the way the limitations are indicated on the RFC – especially with regards to environmental limitations. Does ‘avoid concentrated exposure’ indicated on the RFC equate to a rating of, ‘occasional,’ as coded in the SCO? It has been the practice of most DDSs to consider that if there is an environmental limitation indicated on the RFC (no matter if it’s to ‘avoid concentrated exposure,’ ‘avoid even moderate exposure,’ or ‘avoid all exposure’) and a job is coded at all in the SCO for that factor, the job should be precluded as even incidental exposure could be detrimental to an impaired individual.

#### **Functions of New DOT:**

- Searchable data base that would allow Disability Examiners to cross-match specific skills from a claimant's current job with other jobs involving that same skill (or skills).
- A section for potential transferability to lower occupational bases. (DDSs have informal transferability guides for common occupations)
- User friendliness.
- Search engine for key words/phrases.
- Performance that does not impede the speed/use of other software running simultaneously.

#### **Occupational Information:**

- Addition of common jobs found in PRW, e.g.: Handyman (multiple trades, but no focused specialty- no license), Traveling computer repair person (such as Geek Squad workers at Best Buy)
- New DOT should separate standing and walking. These are two different physical attributes requiring different abilities by the claimant. Use of major joints for repetitive motion should be specified when necessary.
- Computer-based jobs, e.g., Web Designer, Internet Service Rep...

- DOT should be written in work terms meaningful to Disability Examiners. The DOT work history and the DDS Residual Functional Capacity (RFC) Form should work in concert together. Instead of a band playing together, we have an arrangement that has often been described by Disability Examiners as, “three pieces of music being performed in three different tempos by musicians playing on broken instruments and led by a deaf conductor.”
- New DOT should specify stress levels of each job performed under ordinary circumstances. This is a critical factor in determining if claimant’s with mental impairments can return to PRW or perform other jobs in the economy.

**New DOT Beginning/Alternatives**

- Job Browser Pro by Skilltran – available via SSA Intranet and SSA Digital Library. This tool already allows Disability Examiners to research a job to discover all of the skills/competencies required to perform the job (see example below). SSA can build on this tool to add the additional factors, i.e., expanded list of exertional demands and SVP level of each job, searchable data base for matching skills etc.

**JOB BROWSER PRO “SKILLS” EXAMPLES**

169.267-010 CLAIMS ADJUDICATOR

SKILLS/COMPETENCIES: INVESTIGATING

Obtaining and evaluating data about persons, places, and incidents for purposes such as solving criminal cases; settling claims; estimating credit risks; determining the qualifications, integrity, and loyalty of people; assessing eligibility for social-service-assistance programs; and ensuring compliance with laws and regulations.

Advising, Enforcing, Inquiring, Inspecting, Interrogating, Interviewing, Questioning, Scanning, Searching

=====

075.364-010 NURSE, GENERAL DUTY

SKILLS/COMPETENCIES: HEALTH CARING-MEDICAL

Treating people and animals with physical and mental problems.

Bandaging, Bathing, Diagnosing, Disinfecting, Examining, Exercising, Injecting, Inoculating, Interviewing, Investigating, Massaging, Monitoring, Prescribing, Quarantining, Rubbing, Taking Pulse, Treating

=====

201.362-030 SECRETARY

SKILLS/COMPETENCIES: VERBAL RECORDING-RECORD KEEPING

Preparing, keeping, sorting, and distributing records and communications, primarily verbal in character but including symbol devices, to communicate and systematize information and data.

Addressing, Checking, Collating, Counting, Editing, Filing, Listing, Locating, Mailing, Marking, Posting, Punching, Reading, Routing, Searching, Segregating, Selecting, Stamping, Taking Dictation, Taking Minutes, Typing, Verifying, Writing

=====

313.374-014 COOK, SHORT ORDER

SKILLS/COMPETENCIES: COOKING-FOOD PREPARING

Preparing food for human and animal consumption.

Basting, Boiling, Brewing, Churning, Curing, Flavoring, Frying, Heating, Kneading, Measuring, Pasteurizing, Pickling, Rendering, Roasting, Rolling, Seasoning, Spreading, Squeezing

- OccuBrowse offers a potential alternative to the DOT and, with the incorporation of additional information, could become an even more valuable/practical tool for use by the Disability Examiner.

One of the beneficial aspects to OccuBrowse is that it allows for scanning of related job titles in the list of jobs that follow the one entered in the search. This feature, as well as the ability to enter *key words* in the search engine, would be an asset in any future occupational reference materials. The ability to scan related jobs in a list that are closely related to the claimant's job would be a very effective tool in a transferability of skills analysis.

Another useful feature of OccuBrowse is that it includes a category of 'situations' (in the 'Requirements' section). The information it contains assists the Disability Examiner in determining the feasibility of jobs for claimant's who are assessed with mental limitations.

OccuBrowse also lists 'Undefined Related Titles' which can steer the Disability Examiner to a more accurate job title when identifying the claimant's past work as performed in the national economy.

## Questions to Ponder

- It is difficult to make a defensible argument that skills acquired from a claimant's *current* work activity would be transferable to jobs that have a DLU (date last updated) in the 1970s or 1980s! Those are the supposedly 'closely related jobs' that we are citing in our transferability analyses. Unless we can cite more current jobs to which a claimant's skills are transferable, it may be more practical to eliminate the concept of transferability from the program. Of course this would also require some revision of the vocational rules tables as well.

If the transferability concept is eliminated, we would then consider only the claimant's description of past work in Step 4 of Sequential Evaluation (totally avoiding the issue of citing a DOT counterpart). This would allow an updated DOT (or other occupational resource system) to be utilized only in Step 5 (for citation of 'other' unskilled jobs in denial decisions and for citing the vocational rule that directs the final determination). By accepting the claimant's description of past work (when making the function-by-function comparison to the RFC and/or MRFC), we eliminate the cumbersome task of identifying the jobs in the DOT. This would appear to eliminate countless erroneous job identification issues and allow us to abide by the concept that the claimant is 'the primary source' of job information.)

- Education as a vocational factor – In today's rapidly changing technological job market, does a high school diploma or college degree, earned in the distant past, (even 10 years ago), truly add any vocational advantage to a claimant?

**Questions?** The Old Drunk staggers home one night and literally falls to the floor as he opens the door to his house. His wife, glaring down at him lying on the floor, demands to know what he has to say for himself? The Old Drunk looks up to her and replies, "I have no prepared remarks but I'll be happy to take questions from the floor!"

**Occupational Information:**

DOT does not show *reaching* requirements. There are typically 4 levels to be considered: below shoulder level, at shoulder level, above shoulder level, and overhead level.

DOT does not show specific *handling* requirements: basic grasping, forceful grasping, twisting of wrist/arm required.

*Fingering* requirements: pinching, keyboarding, etc. Bilateral requirement, unilateral...

Environmental factors such as dust, fumes, etc. in jobs such as sewing machine operator. Size of machinery may help in determining if it imposes another hazard.

Stress issues. Can a stress level be specified?

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**NATIONAL ASSOCIATION  
OF DISABILITY REPRESENTATIVES  
(NADR)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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## **NADR OIDAP COMMITTEE - COLLABORATIVE OPINION July 2009**

### **Introduction**

The National Association of Disability Representatives (NADR) is a professional organization comprised of attorneys and non-attorneys who assist claimants applying for disability income assistance from SSA. NADR members come from diverse backgrounds and thus offer a depth of collegial understanding and resources that is unrivaled. A small task force comprised of members who provide representation to disabled persons and come from varied administrative, legal and vocational backgrounds volunteered to discuss the issue of how to fix and/or update the Dictionary of Occupational Titles (DOT). Four of the central five task force members are CRC's and have 120 years combined experience as VE's in general, 64 years specifically as a SSVE, and 32 years as a representative. We welcome the invitation to offer the OIDAP our insights into the needs of the future of the DOT. We also wish to thank Commissioner Astrue, through the OIDAP, for his visionary understanding of the problems encountered in disability determination with the outdated DOT and the need to update such.

### **The need to maintain a well defined work theory**

Despite the fact that the DOT is outdated, SSA and Disability Management companies continue to use it for a simple reason – its structure. The classification system used by the DOT provides structure for analyzing the demands for work that is the envy of the world. That system is the Minnesota Work Adjustment Theory. The principles of this theory were originally outlined in the Handbook for Analyzing Jobs (HAJ) and followed in 1991 with the Revised Handbook for Analyzing Jobs (RHAJ). If/when/as the DOT is redeveloped, NADR believes there must be a strong methodological underpinning to the development of additional definitions.

The principles used in the original process should be utilized in the construction of any replacement of the DOT for many profound reasons. Some of these are:

- Each occupation must have a fundamental “anatomy” consisting of the specific demands of that occupation. (NOTE: The O\*Net is not useful because of the way it clusters occupations therefore under the O\*Net system the occupations may have multiple ranges for skill demands as well as exertional and non exertional demands.) At a minimum, each occupation should have

one (SVP) skill and one Strength classification (though these can certainly be modified from the current levels as discussed below). The occupational demands should not only consider SVP, Strength, and the other exertional and non-exertional demands found within the SCO but should also take into account functional limitations that are commonly discussed during the hearing process. A sample list of these requirements is found in the Temperament discussion below.

- Occupational definitions must be constructed based on sound methodology in order to assure a high level of validity when there is controversy. Acceptable scientific standards would stand up to a Daubert challenge. This would allow for more fairness to all parties and especially to claimants.
- A clear system for occupational analysis is essential to performing a methodological Transferable Skills Assessment.
- Any replacement for the DOT must quantify each worker-trait factor of each occupation in a format that is searchable within various digital applications. Cross referencing and software applications have been very useful in analyzing the DOT.
- A revised DOT must include a standard such as that used in the RHAJ in order to mitigate against opinion evidence that is not based on an acceptable source and standard. Adjudicators and experts should have a standard by which to present their opinion. Currently, adjudicators are limited to opinion that may not be, and in fact is not, based upon acceptable standardized methods. For example, if an expert opines that they have performed labor market research, then, the methodology of that research should be available and held against a standard.
- Functional limitations due to medically determinable impairments must be methodologically reviewed and replicable. Such limitations, which commonly appear during the development of a claim, may preclude or reduce employment to a less than sedentary level but are difficult to quantify due to an inability to obtain accurate and verifiable information regarding the limitation's impact on the ability to perform or sustain a specific job/occupation, . These may include but are not limited to the assorted temperaments as discussed in the RHAJ as well as acceptable (or unacceptable) rates of absenteeism, the need to elevate one's legs, levels of public interaction, levels of working with co-workers, etc.

These principles have been studied extensively in academia and supported by the leading Vocational Expert Associations.

### **Physical demands and the effects of those limitations on job numbers or job access**

The DOT was not designed to assess labor market access or the impact of functional limitations on an individual's employability. A companion to the new document should provide a methodology that demonstrates the impact of reduced physical abilities on an individual's ability to *sustain* gainful activities (as well as *obtain* for the purpose of rehabilitative efforts in other venues). All vocational professionals know

that there are essential job functions as well as minor job functions. The elimination and/or severe restriction of the ability to perform essential functions directly affect SGA. When combined with limitations in another essential or minor job function, the impact on the reduced number of jobs is *exponential and not linear*. But, most VEs in response to a hypothetical respond that each additional limitation will impact job numbers by 50% or 25%. This is an ineffective assessment that lacks any scientific reliability, validity and little or no agreement among VEs or ALJ's. This companion to the revised DOT would assess the 19 physical demands of jobs (except strength) and apply similar guidelines to those used in psychological assessments: mild, moderate, severe. In this format a qualitative assessment of employability could be made. A methodology or replicable evaluative tool should be developed whereby severe limitation in more than one physical demand would be disabling, as would the combination of severe limitations in one essential function and two or more minor functions.

### **The meaning of the term "significant"**

In order to make a determination at Step V in the sequential evaluation process, after considering the claimant's medical/vocational profile and residual functional capacity, the burden of proof shifts to the Commissioner to determine whether there is a "significant" number of jobs one can perform in the region or several regions of the national economy.

An excerpt taken from SSR 82-53 (below) defines "significant" as existing "in one or more occupations". Often Vocational Experts are asked to testify to provide the framework for this step in the evaluation by providing the incidence of a job or jobs in the national economy. Unfortunately, there is no government or private source that provides this information as it relates to a specific occupation or Dictionary of Occupational Titles Number. Consequently, there is no scientific methodology for providing these estimates of the numbers of jobs that would even loosely meet Daubert standards.

The term "significant" has been interpreted in some circuits as being as few as a couple hundred jobs in the national economy. Moreover, Administrative Notice has been given to several Unskilled Job Titles that have not been updated since the early 90's.

In order for this term to be meaningful at this important step in the evaluation process, the following changes need to occur:

1. An update of the Sedentary, Light and Medium Unskilled jobs that have been given Administrative notice as occurring in significant numbers;
2. A definition for "significant" that embodies the spirit in which this benchmark was intended and is less open to interpretation with the low threshold that has been upheld previously;
3. A mandate that experts testifying in regard to the incidence of jobs be required, when asked, to produce the supporting documents and methodology for their numbers so that they can be verified and reproduced.

#### *SSR 82-53*

*Capacity to Do Other Work — If an individual cannot perform any past relevant work because of a severe impairment(s), but the remaining physical and mental capacities are consistent with meeting the physical and mental demands of a significant number of jobs (in one or more occupations) in the national economy, and the individual has the vocational capabilities (considering age, education, and past work experience) to make*

*an adjustment to work different from that performed in the past, it shall be determined that the individual is not disabled. However, if an individual's physical and mental capacities in conjunction with his or her vocational capabilities (considering age, education and past work experience) do not permit the individual to adjust to work different from that performed in the past, it shall be determined that the individual is disabled.*

## Temperaments or Job - Worker Requirements

As the panel is aware, the SCO companion to the DOT provides the user with numerous physical and/or other requirements within the job or occupation. Many of these are valuable for job placement assistance and other issues utilized within the vocational rehabilitation profession. Often overlooked, but very useful tools within this document are the Temperament Codes.

Oftentimes a secondary or even primary disabling impairment is non-exertional in nature and may impact the individual's capacity to successfully sustain SGA. The disabling element that the claimant faces is an incongruity between their post disability residual personality traits and the job-worker traits of specific jobs or occupations. Eleven of these traits are discussed and defined in the SCO as Temperaments. They are defined in the Enhanced GOE as "adaptability requirements placed on the worker by specific types of job-worker situations...and... (are) often predictors of employee success in the job since **many job failures are more the result of an inability to adjust to a work situation than an inability to do the required tasks.**"

The 11 temperaments are:

<b><i>Directing</i></b>	Controlling or planning the activities of others
<b><i>Repetitive</i></b>	Performing short cycle repetitive work.
<b><i>Influencing</i></b>	Modifying people's opinions, attitudes and judgments
<b><i>Variety</i></b>	Successfully change and perform several different work tasks throughout the workday
<b><i>Expressing</i></b>	Using imagination or creativity.
<b><i>Alone</i></b>	Working apart or in physical isolation from others for long periods of time.
<b><i>Stress</i></b>	Working under stress caused by emergencies, danger, or criticism.
<b><i>Tolerances</i></b>	Working with extreme precision in making, inspecting, and/or recording, data, things, and/or computations.
<b><i>Under</i></b>	Working under specific instructions with little or no room for independent action or judgment
<b><i>People</i></b>	Working with and helping others
<b><i>Judgment</i></b>	Making decisions based upon what one sees, touches, or hears

We believe that any future iteration of the DOT/SCO and job analyses undertaken (should that occur) should utilize these or similar highly relevant worker traits to more clearly define the essential job-worker functions required.

Furthermore, the taxonomy of such should provide the assessor with a more objective methodology to determine whether the job-worker functions are compatible with the claimant's psychological RFC.

These (and other non-exertional and/or psychological limitations) can be based upon percentages required of these essential job-worker functions as discussed above.  
(i.e. Truck Driver – D:0% R:0% I:0% V:80% E:0% A:60% S:20% T:80% U: 100%  
P:80% J: 100%)

or **N**ever, **R**arely, **O**ccasional to Often, **F**requent, **C**onstant  
(i.e. Truck Driver – D:N R:N I:N V:F E:N A:F S:R T:F U:C P:F J:C).

The clarification of these issues will allow the decision maker, the Agency, and the claimant (or his/her representative) a more clear taxonomy to objectively rate and more accurately respond to the hypothetical situation presented. Oftentimes at hearing the hypothetical question posed will include limitations such as “limited capacity to work under stress” or “must avoid working with the public and co-workers.” Questions such as this are extremely important to establish the individual’s capacity to perform, and more importantly sustain SGA, but are not quantifiable. We believe that a more clear description of the job-worker traits will provide all parties with a more objective methodology to determine an individual’s capacity to make adjustment to work. In the end, this will more accurately assist the agency to arrive at the correct decision at the earliest possible time.

### **Transferability of Skills and VE Qualifications**

The qualification standards for vocational experts should address the need for competency in evaluating the critical factors that comprise functional assessments and how they relate to functional capacity. Various organizations have established criteria for this purpose. The American Board of Vocational Experts has set forth several standards for identifying persons for board certification as Vocational Experts. Most relevant for SSA consideration may be the following:

Hold a Master's or Doctorate degree from an accredited institution in human service field specializing in vocational rehabilitation, psychology, vocational counseling, or a closely related field; and

Have specific training and experience in such areas as assessment, functional capacity measures, psychological testing and measurement, job analysis, job placement, job surveys, and have experience providing testimony in these areas.

Although ABVE does not specify a minimum experience requirement, it may be useful to establish a practice baseline of five (5) years, by which time an applicant would be deemed sufficiently qualified to apply for standing as an SSA VE.

By adopting educational and experience/practice standards, SSA would ensure that all VEs possess those qualifications typically identified by the industry as essential prerequisites for vocational expert testimony. Such individuals should be familiar with acceptable methodologies for identifying transferable skills from past relevant work, in order to identify other work that may be compatible with a current residual functional capacity (RFC) and claimant profile. Using a standard methodology for the process of skills analysis and the identification of jobs under SSA's concept of transferability would assure that an SSA VEs findings are reproducible and consistent, based upon empirical data.

## Physical and Mental Limitation Outliers

The terms sit-stand and sit-stand option are used often in disability adjudication incorrectly. A sit-stand option is not addressed in the Dictionary of Occupational Titles, (DOT, 1991) under physical demands. However, many VE's attempt to fit the term into the outlined physical demands incorrectly. The DOT (1991) states: Sedentary work involves sitting most of the time, but may involve walking or standing for brief periods of time. Jobs are sedentary if walking and standing are required only occasionally and all other sedentary criteria are met. Occasionally is defined as up to 33% of the work day. Thus, in an eight hour work day 2.7 hours could entail standing. The free will of an individual to sit or stand as needed is not considered. If we were to take the term sit-stand at will literally, then the occupation would entail sitting and standing equal parts of an eight hour day. Thus, any occupation with a sit-stand option would be classified as a light duty position utilizing the DOT definition. It cannot be a sedentary duty occupation based on the DOT definition of sedentary duty work. Further, one would need to consider if the light duty occupation would allow the work to be performed in both the sitting and standing positions without interruption of work flow, if the occupation would require accommodations, and the SVP.

*Reference: Dictionary of Occupational Titles, 1991*

*IV. PHYSICAL DEMANDS - STRENGTH RATING (Strength) The Physical Demands Strength Rating reflects the estimated overall strength requirement of the job, expressed in terms of the letter corresponding to the particular strength rating. It represents the strength requirements which are considered to be important for average, successful work performance. The strength rating is expressed by one of five terms: Sedentary, Light, Medium, Heavy, and Very Heavy. In order to determine the overall rating, an evaluation is made of the worker's involvement in the following activities:*

*Standing, Walking, Sitting*

*Standing - Remaining on one's feet in an upright position at a work station with-out moving about.*

*Walking - Moving about on foot.*

*Sitting - Remaining in a seated position.*

**S-Sedentary Work** - Exerting up to 10 pounds of force occasionally (*Occasionally: activity or condition exists up to 1/3 of the time*) and/or a negligible amount of force frequently (*Frequently: activity or condition exists from 1/3 to 2/3 of the time*) to lift, carry, push, pull, or otherwise move objects, including the human body. Sedentary work involves sitting most of the time, but may involve walking or standing for brief periods of time. Jobs are sedentary if walking and standing are required only occasionally and all other sedentary criteria are met.

**L-Light Work** - Exerting up to 20 pounds of force occasionally, and/or up to 10 pounds of force frequently, and/or a negligible amount of force constantly (*Constantly: activity or condition exists 2/3 or more of the time*) to move objects. Physical demand requirements are in excess of those for Sedentary Work. Even though the weight lifted may be only a negligible amount, a job should be rated Light Work: (1) when it requires walking or standing to a significant degree; or (2) when it requires sitting most of the time but entails pushing and/or pulling of arm or leg controls; and/or (3) when the job requires working at a production rate pace entailing the constant pushing and/or pulling of materials even though the weight of those materials is negligible.

*NOTE: The constant stress and strain of maintaining a production rate pace, especially in an industrial setting, can be and is physically demanding of a worker even though the amount of force exerted is negligible.*

**M-Medium Work** - Exerting 20 to 50 pounds of force occasionally, and/or 10 to 25 pounds of force frequently, and/or greater than negligible up to 10 pounds of force constantly to move objects. Physical Demand requirements are in excess of those for Light Work.

**H-Heavy Work** - Exerting 50 to 100 pounds of force occasionally, and/or 25 to 50 pounds of force frequently, and/or 10 to 20 pounds of force constantly to move objects. Physical Demand requirements are in excess of those for Medium Work.

**V-Very Heavy Work** - Exerting in excess of 100 pounds of force occasionally, and/or in excess of 50 pounds of force frequently, and/or in excess of 20 pounds of force constantly to move objects. Physical Demand requirements are in excess of those for Heavy Work.

## Summary

NADR feels that future DOT modifications should be theoretically based on models that have proven effective. The present model is vocationally relevant and should be tweaked versus re-worked.

Though outdated, we believe the DOT provides a sound theoretical base upon which to gather updated occupational information on jobs already contained within the DOT as well as jobs and occupations which had not existed prior to 1991.

The DOT adequately focuses upon the physical demands of work but is highly deficient in the mental requirements of job-worker situations. This must be updated.

Objective job requirements are essential to allow end-users of the process to proficiently determine disability, and should be developed as part of this process. The Psychiatric Review Technique Form (PRTF) currently in use by the SSA is a good starting point for such quantification.

Vocational experts used in hearings and vocational counselors used at the DDS level have varied, and sometimes deficient, educational backgrounds. Minimum qualifications must be established with ongoing training and education for any person accepted to provide vocational testimony to the SSA.

Clarification of outlying issues that are commonly presented at hearing (i.e. sit/stand option, leg elevation, low stress jobs, minimal interaction with co-workers or supervisors) must be objectively defined as well.

The NADR task force appreciates the opportunity to share our views with the OIDAP panel through this written submission. We look forward to being able to comment on the panel's sub-committee proposals as they evolve in the future, present our opinions or participate in discussions directly should it be desired, and most importantly, provide the committee a resource comprised of persons who have been on both sides of the professional fence for a vocationally relevant period of time.

Respectfully Submitted

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## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**NATIONAL COUNCIL OF  
DISABILITY DETERMINATION DIRECTORS  
(NCDDD)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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## **Presentation to the Occupational Information Development Advisory Panel June 10, 2009**

### **Introduction**

#### **Information needed to adjudicate claims**

- Compilation of jobs currently existing in the national economy
- Consistently structured job descriptions listing duties, work processes, tools/machines used, and required skills
- Functional requirements for each job corresponding to SSA-defined physical and mental RFC assessment categories and measures
- Links to jobs with similar duties, tools/machines, skill sets, and industry for accurate, consistent transferability assessments. Where transferability of skills among a subset of jobs has been established, these lists should be readily available to all adjudicators, and their application should be official SSA policy for all adjudicative levels
- List of unskilled jobs at each exertional level that require no more than the basic mental/cognitive demands of competitive work and that currently exist in significant numbers in the national economy – for adjudicative reference in determining jobs to cite in other work denials where skill transferability does not exist or is not material to the decision

#### **Gaps between DOT/SCO and what is needed to adjudicate claims**

1. DOT has not been comprehensively updated in many years
  - Many jobs are missing, especially in the fields of computer technology, administration, programming, web design, database management, data entry, computer chip manufacturing, communications, medicine, automotive manufacturing and services, “green” businesses, trucking (where technology has made operation less exertional), retail store greeters, etc.
  - Composite jobs have multiplied as companies have downsized and done “more with less.” This may affect the number of unskilled jobs in the national economy, as these jobs have been incorporated into the duties of jobs that also involve more complex tasks (e.g. SSA Field Office managers opening the mail). The DOT provides few distinct descriptions for assistant managers, working supervisors, and lead workers (who also oversee the shifts they work but are not responsible for hiring, firing, and other managerial duties).

- Some DOT job descriptions are no longer accurate – jobs are performed differently now (e.g. retail and restaurant workers may do heavier lifting with more stocking duties; manufacturing and materials handling jobs may require less exertion as computer-assisted technology and robotics do more; printing/publishing jobs may have changed or disappeared, etc.)
  - Some DOT jobs are now obsolete. Jobs that have not existed in significant numbers in the past 15 years need to be removed.
2. The SCO provides limited information about the functional requirements of jobs, often merely whether or not the function is used to a significant degree, without further specification. More information is needed to perform function by function comparisons to identify jobs within a claimant’s individual RFC restrictions:
- Exertional requirements – quantify in greater detail than the SCO’s broad exertional ranges – specify separately the lifting, standing, walking, and sitting requirements; additional push/pull requirements; whether the job can accommodate alternating standing and sitting positions and how frequently
  - Postural requirements – provide frequency according to RFC measures (none, occasional, frequent)
  - Reaching requirements – specify height (overhead, shoulder, waist, etc.), direction (front, side), and whether job requires bilateral reaching or can be done with one arm only
  - Manipulative functions – specify size of objects and whether job can be done one-armed
  - Climbing – specify type (ropes, ladders, ramps, stairs, etc.)
  - Balance – specify the surface – narrow, moving (serving food on airplane), uneven, smooth, etc.
  - Vision – specify requirements for fine precision, distance, depth perception, accommodation, etc.
  - Hearing – specify the degree of interpersonal interaction, telephone use, required response to auditory signals
  - Environmental – specify frequency of exposure to the specific categories on the RFC
  - Vibration – specify the intensity and frequency
  - Mental demands – The DOT/SCO’s Data/People/Things and Reasoning/Mathematical/Language coding gives some information but does not correlate with the specific MRFC limitations. Need to specify requirements in line with the mental RFC categories and measures, including the basic mental demands of unskilled work, especially:
    - Level of task complexity (e.g. number of steps, independent judgment required)
    - Intensity of concentration/persistence/pace (e.g. production, speed, and timeliness expectations)
    - Types and intensity of interpersonal interactions (e.g. public contact, high accuracy requirements yielding likelihood of supervisory criticism, teamwork with co-workers, amount of conflict inherent in the work, etc.)
    - Frequency and intensity of changes requiring worker adaptation with examples
    - Whether the job can accommodate variable schedules, extra work breaks, etc. (Extra work breaks may also be needed for certain types of physical impairments that cause fatigue or require frequent use of the bathroom, etc.)

### **New information needed**

- Reassessment of the vocational rules and the occupational bases they represent (number of jobs in the national economy that are unskilled, sedentary, light, medium, etc.) given the changes from a manufacturing to an information and services-based economy and the technological changes that have transpired since the vocational grids were created. The current vocational rules were created for a different society and do not take into consideration today’s reality of older workers remaining employed longer. They also do not reflect the technology advances that have caused an overall shift to lighter, less English-reliant work. How many unskilled sedentary jobs currently exist, and what exactly do they require in the way of physical and mental abilities?

- Ongoing assessment of how long skills in various occupations remain viable, aligning SSA policy for how far back in claimants' job histories adjudicators must go in determining relevance and transferability

**Information Platform** – we recommend an electronic database with the following features:

- Searchable by title, keyword, skills, tools/machines, etc. with progressive search options giving adjudicators the ability to efficiently narrow or broaden their search as needed
- Cross-references for synonymous or closely related job titles
- Built-in thesaurus of similar terms/titles
- Glossary of tools, machines and other technology with which adjudicators may be unfamiliar
- Other methods of providing greater understanding of the tasks, tools, and operations of jobs (e.g. links to video clips of how a certain machine is operated)
- Capacity to systematically retrieve lists of jobs to which skills could potentially be transferred once past work is identified - the adjudicator should be able to customize the list of duties, skills, tools, and work products for the claimant actual job, input parameters such as RFC limitations, age and education, and obtain a list of jobs to which skills might be transferred. The adjudicator must still analyze these options and make the transferability decision, but a systematic and well-built search mechanism would make these decisions more consistent and accurate
- Structured operation of the database guiding users through the steps of vocational analysis and providing ways for them to explain their step-by-step decisions (why they ruled in or out a job as being the one performed by the claimant, why they ruled in or out a job as offering transferability, why they ruled in/out the adverse vocational profiles and chose certain vocational rules, how they made decisions about remaining occupational base and citation of jobs within the claimant's RFC or lack thereof)
- Interface with the electronic folder so that the database search findings and the adjudicator's analysis of those findings become part of the file in a standard format
- Easily updatable and supported by a routine, ongoing process of updating
- Adaptable to future policy changes in such areas as RFC assessment and vocational analysis
- User-friendly with a minimum of screen tabs/toggling required; options available for bulleted lists of duties and skills, rather than paragraphs, etc.
- Use of the platform by all levels of adjudication including ODAR

### **Available resources**

- OccuBrowse/OASYS – good key word search engine, helpful in finding related job titles and jobs with potential transferability, but very “green screen” and requires many screen changes/toggles. We need a comprehensive search engine that not only permits customizing the Worker Trait Search, but also incorporates the components of the GOE (Guide to Occupational Exploration), the PSMS (Materials, Products, Subject Matter, and Services), and the WF (Work Fields).
- Occupational Outlook Handbook (Bureau of Labor Statistics web site) – wealth of information for a wide variety of occupations, revised every two years
- Job Browser Pro by Skilltran
- The “less than” search function of the Denver DOT
- O\*Net has some promising features but lacks links to RFC categories and measures of limitations
- “County Business Patterns” publications
- Vocational experts
- Any assessment tools used by rehabilitation or occupational therapy industries?
- Industries that may have developed comprehensive standardized job specifications and a process for updating them
- Potential for collaboration with DOL and VR?

## **Related recommendations for SSA**

- Revise SSA-3369 (Vocational Report) to ask claimants better questions about job descriptions, functional requirements, and skills – in line with RFC categories and measures. Remove yes/no questions that do not provide needed descriptions. A detailed job description is critical information in every case decided at Steps 4 and 5 of sequential evaluation
- Provide comprehensive training to adjudicators on the use of the occupational information tools
- Prioritize the updating of job descriptions and do the most frequently occurring jobs (as reported on claimant 3369's) first
- Consider expanding the Listings and possibly including some demographics (in the same vein that function has been added to some Listings) to reduce the number of claims for which a vocational analysis must be undertaken.

## **Closing**

This project has exciting possibilities. It has the potential to improve the consistency and quality of vocational analysis and disability determination across the national program. We hope that the cost, time and effort involved in updating the data and creating a “smart” platform will not be considered prohibitive. It is critical to keeping the disability program valid and its determinations fact-based in the 21<sup>st</sup> century. SSA needs to act soon, since much of the DOT data is obsolete and the available tools do not meet all adjudicative needs or provide the supports necessary to process a burgeoning workload in a timely manner. Thank you for the opportunity to provide input into the process.

Presented by  
Trudy Lyon-Hart  
Secretary, National Council of Disability Determination Services

**User Needs and Relations Subcommittee  
Content Model and Classification Recommendations**

Comments Received  
from the

**NATIONAL ORGANIZATION OF  
SOCIAL SECURITY CLAIMANTS' REPRESENTATIVES  
(NOSSCR)**

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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**NATIONAL ORGANIZATION OF  
SOCIAL SECURITY CLAIMANTS' REPRESENTATIVES  
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*Executive Director*  
**Nancy G. Shor**

July 31, 2009

Mary Barros-Bailey, Ph.D.  
Interim Chair  
Occupational Information Development Advisory Panel  
Social Security Administration  
6401 Security Boulevard  
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*Submitted by email to  
Debra.Tidwell-Peters@ssa.gov*

Dear Doctor Barros-Bailey:

Thank you for the opportunity to submit initial comments on behalf of the National Organization of Social Security Claimants' Representatives (NOSSCR) to the Occupational Information Development Advisory Panel (Panel). These comments are preliminary and reflect some general issues we would like to raise at this time. We will submit comments that address and directly respond to the Panel's recommendations to be issued in September 2009.

I am the NOSSCR Director of Government Affairs. Founded in 1979, NOSSCR is a professional association of attorneys and other advocates who represent individuals seeking Social Security and Supplemental Security Income (SSI) disability benefits. NOSSCR members represent these individuals with disabilities in legal proceedings before the Social Security Administration (SSA) and in federal court. NOSSCR is a national organization with over 3,900 members from the private and public sectors and is committed to the highest quality legal representation for claimants.

The objective and mission of the Panel is set forth in its Charter: To offer advice and recommendations on plans to replace the Dictionary of Occupational Titles (DOT); to advise SSA on creating an occupational information system (OIS) tailored specifically for SSA's disability programs and adjudicative needs; and to offer advice and recommendations to SSA in specified and other areas "that would enable SSA to develop an occupational information system suited to its disability programs and improve the medical-vocational adjudication policies and processes." Based on the Panel's Charter, its primary mission is to advise SSA in ways to improve the SSA adjudicative process regarding medical-vocational analysis.

We strongly support changes to make the process more efficient so long as those changes do not affect the fairness of the procedures used to determine a claimant's entitlement to benefits. The purposes of the Social Security and SSI programs are to provide cash benefits to those who need them and have earned them and who meet the eligibility criteria. While there may be ways to improve the decision-making process from the perspective of the adjudicators, the critical measure for assessing initiatives for achieving administrative changes must be how they affect the very claimants and beneficiaries for whom the system exists.

The current framework used in the Social Security and SSI disability claims process takes into account the medical-vocational factors required by the statute and calibrates those factors to benefit individuals with the most adverse vocational factors. For instance, the United States Supreme Court has noted, regarding the current Medical-Vocational Guidelines ("the Grid Rules"),<sup>1</sup> that:

[The guidelines] consist of a matrix of the four factors identified by Congress – physical ability, age, education, and work experience – and set forth rules that identify whether jobs requiring specific combinations of these factors exist in significant numbers in the national economy.<sup>2</sup>

The Grid Rules acknowledge the interplay between the various vocational factors used in the Grids – age, education, work experience, and residual functional capacity (RFC). The rules must, by statute, be weighed in favor of those with more adverse vocational characteristics. For example, under SSA's current framework, low education is an adverse vocational factor; lack of transferable skills is an adverse vocational factor; being limited to sedentary work is an adverse vocational factor. When these three factors are combined, the Grid Rules recognize that the occupational base is so restricted that a finding of "disabled" is warranted.

If nonexertional limitations are involved,, the Grid Rules do not apply directly, but do offer a framework, thus recognizing the difficulty in quantifying such limitations in any type of objective matrix. Other SSA policies, e.g., regulations and Social Security Rulings, provide the necessary guidance to adjudicators.

Given that the general framework works, it would be inappropriate to jettison the entirety of the current process if there are only specific parts of it that need to be changed. For example, everyone agrees that the DOT needs to be updated. That does not mean that the Panel should see that need as a reason to reform the framework as a whole.

### **General Principles**

We believe that the Panel should focus on the following general principles in its recommendations:

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<sup>1</sup> 20 C.F.R., Part 404, Subpt. P, App. 2.

<sup>2</sup> *Heckler v. Campbell*, 461 U.S. 458, 461-62 (1983).

1. The DOT job descriptions should be updated to describe the jobs that exist in today's economy.
2. The definition of "disability" in the Social Security Act (the Act) requires an individualized assessment of ability to perform substantial gainful activity by considering the individual's functional limitations in light of his/her age, education, and work experience.<sup>3</sup> The interplay between the factors must be included.
3. Evaluation of symptoms is unique to each individual claimant, cannot be quantified, and requires an individualized assessment. Current regulations and SSA provide detailed guidance regarding the evaluation of subjective symptoms, including pain.<sup>4</sup> Factors which must be included in the disability determination include:
  - Pain (which can impact physical exertional limits as well as focus and concentration);
  - Fatigue (requiring extra rest breaks during work period);
  - Reaching limitations;
  - Manipulative functions, including circumstances where person has lost effective use of one upper extremity;
  - Sensory loss (vision, hearing, feeling);
  - Dizziness (often caused as a side effect of medications);
  - Impairment of bodily functions requiring frequent restroom breaks;
  - Balance limitations due to dizziness or physical impairments;
  - Environmental limitations due to allergies;
  - Mental demands (including level of task complexity; intensity of concentration, persistence, pace; types and intensity of interpersonal interactions with co-workers, supervisors, and public; and degree of stress in work).
4. As required by the Act, only those jobs existing in "significant" numbers that a claimant is able to perform in light of his/her age, education, work experience, and residual functional capacity should be identified.
5. Any changes in the framework for analyzing medical-vocational factors must ensure that individuals who meet the statutory definition of disability are found eligible for benefits. The process cannot be subject to eligibility criteria that could be susceptible to political pressures to exclude eligible applicants. We recommend that the Panel issue a "Beneficiary Impact Statement" to determine the impact of its proposed changes on specific applicant groups.

### **Comments**

At this time, we have some initial comments to some of the issues that the Panel is considering. Our comments are informed by the responses we received to your recent letter addressed to NOSSCR members.

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<sup>3</sup> 42 U.S.C. § 423(d)(2).

<sup>4</sup> 20 C.F.R. §§ 404.1529 and 416.929.

## **I. Update Job Descriptions**

We received a number of comments from NOSSCR members regarding the need to update the job descriptions currently found in the DOT. Their comments are summarized below:

- Delete jobs that no longer exist in the national economy or no longer exist in “significant” numbers.
- Ensure that job tasks are consistent with required exertional levels.
- Ensure that the exertional levels of similar jobs in the same occupation groups are consistent with each other.
- Include jobs that now exist in significant numbers, e.g., computer/IT jobs.
- Update job descriptions for accuracy.
- Update job descriptions for jobs that still exist but are performed differently now, e.g., a worker may now need computer literacy.
- Identify whether a job is full-time or part-time. The Social Security Act makes clear that, for an individual who cannot do their past relevant work, SSA must show evidence of full-time jobs that the individual would be able to do. Some jobs that were previously full-time are now considered part-time.
- Consider whether the job includes task rotation. Supervisors in some jobs are required to perform more exertional tasks if necessary. For example, a restaurant manager may need to wait on tables and clear tables. A fire department supervisor may need to respond to a fire call.
- Obtain hard data on jobs that allow for a sit/stand option.
- Obtain hard data on unskilled sedentary jobs that exist in “significant” numbers.
- SSA should coordinate with other government agencies that maintain job census data to ascertain the existence of jobs in “significant” numbers.
- Social Security Ruling (SSR) 00-4p provides guidance to adjudicators in resolving conflicts between vocational expert testimony and the DOT. We believe that, as policy guidance, SSR 00-4p works well and should be incorporated into the Panel’s recommendations. SSR 00-4p provides that a vocational source can offer evidence that differs from the DOT, including information that is not found in the DOT. In that case, the adjudicator is required to resolve the conflict by determining whether the explanation provided by the vocational source or expert is “reasonable.”

## **II. Skills**

The definition of “skill” in SSA’s regulations and other policies, e.g., SSR 82-41, should be retained. Under SSR 82-41, a “skill” is defined as:

... [K]nowledge of a work activity which requires the exercise of significant judgment that goes beyond the carrying out of simple job duties and is acquired through performance of an occupation which is above the unskilled level (requires more than 30 days to learn). It is practical and familiar knowledge of the principles and processes of an art, science or trade, combined with the ability to apply them in practice in a proper and approved manner. This includes activities like making precise measurements, reading

blueprints, and setting up and operating complex machinery. A skill gives a person a special advantage over unskilled workers in the labor market.

As required by the regulations, SSA must look at the individual's past relevant work history, determine the skill level of that work, and if that work is semi-skilled or skilled, whether the skills can be used in other work.

A revised OIS must recognize the existence of unskilled work. Hard data should be obtained regarding unskilled jobs at the sedentary and other exertional levels that currently exist in "significant" numbers in the national economy. Under SSR 82-41:

Skills are not gained by doing unskilled jobs, and a person has no special advantage if he or she is skilled or semiskilled but can qualify only for an unskilled job because his or her skills cannot be used to any significant degree in other jobs.

Regarding transferable skills, there is no software program that can conclusively answer the question whether skills are transferable. As noted by SSR 82-41:

The table rules in Appendix 2 [the Grids] are consistent with the provisions regarding skills because the same conclusion is directed for individuals with an unskilled work background and for those with a skilled or semiskilled work background whose skills are not transferable. A person's acquired work skills may or may not be commensurate with his or her formal educational attainment.

Given SSA's policy for evaluation of transferable skills, an individualized assessment is required. For example, under current regulations:

(1) For individuals age 50 to 54, a finding of disabled is warranted if claimant, limited to sedentary work, has a high school education which does not provide for direct entry into skilled work and has no transferable skills from semi-skilled or skilled past work.<sup>5</sup>

(2) In order to find transferability of skills to skilled sedentary work for individuals who are of advanced age (55 and over), there must be very little, if any, vocational adjustment required in terms of tools, work processes, work settings, or the industry.<sup>6</sup>

The regulations and SSR 82-41 provide guidance in determining transferability of skills, which is part of the larger issue of vocational adjustment. These agency policy directives make it clear that a generalized categorization, assuming that the individual has acquired certain skills, is inappropriate, and that the adjudicator must make an individualized assessment of the claimant, including consideration of exertional and nonexertional limitations, past work, whether any skills were acquired in semi-skilled or skilled past work, and whether the claimant's limitations allow acquired skills to be used in other jobs.

### **III. Mental Demands of Jobs**

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<sup>5</sup> 20 C.F.R., Part 404, Subpt. P, App. 2, § 201.00(g).

<sup>6</sup> 20 C.F.R., Part 404, Subpt. P, App. 2, § 201.00(f).

As noted above, evaluation of nonexertional limitations requires an individualized assessment. These types of limitations cannot be quantified, which is recognized by SSA regulations precluding the use of the Grid Rules if a claimant has only nonexertional impairments. This approach is particularly important for individuals with work limitations caused by mental impairments.

Any attempt to create a quantifiable matrix or rating system to be used in such cases would be subject to close scrutiny regarding its legality, based on a past effort by SSA. In the 1980s, SSA had an illegal, clandestine policy to deny the claims of individuals and terminate the benefits of beneficiaries with mental impairments. The agency used a form to rate the severity of 17 signs and symptoms and decided the claim based on the numerical rating. An individualized assessment of the individual's ability to work was not performed at any step of the process. Class actions were filed, challenging this policy. The courts found the procedure unlawful because it used a presumption that did not provide for the evaluation of residual functional capacity required by law.<sup>7</sup> We strongly oppose any type of rating system that would provide a "bright line" determining who is disabled and who is not if they have nonexertional limitations.

In response to the litigation and congressional action, SSA changed its policies regarding the assessment of limitations caused by mental impairments. Social Security Ruling (SSR) 85-15 still provides crucial guidance in the evaluation of mental residual functional capacity, stating that the mental RFC finding requires "careful consideration." SSR 85-15 describes the basic mental demands of competitive, remunerative, unskilled work:

- The ability (on a sustained basis) to understand, carry out, and remember simple instructions;
- The ability to respond appropriately to supervision, coworkers, and usual work situations; and
- The ability to deal with changes in a routine work setting.

SSA 85-15 states that "[a] substantial loss of ability to meet any of these basic work-related activities would severely limit the potential occupational base. This, in turn, would justify a finding of disability because even favorable age, education, or work experience will not offset such a severely limited occupational base."

We believe that the policy guidance regarding the basic mental demands of work in SSR 85-15 must be retained.

**Stress.** A particular job is not, in and of itself, stressful. It is the individual's response to stress that is critical in evaluating mental RFC. SSR 85-15 provides excellent guidance addressing how stress should be assessed and emphasizing "the importance of thoroughness in evaluation on an individualized basis." SSR 85-15 cautions against creating any type of presumption in evaluating stress regarding a specific individual:

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<sup>7</sup> *City of New York v. Heckler*, 578 F. Supp. 1109 (E.D.N.Y. 1984), *aff'd*, 742 F.2d 729 (2nd Cir. 1984), *aff'd*, 476 U.S. 467 (1986); *Mental Health Ass'n of Minn. v. Schweiker*, 554 F. Supp. 157 (D.Minn. 1982), *aff'd*, 720 F.2d 965 (8th Cir. 1983).

The reaction to the demands of work (stress) is highly individualized, and mental illness is characterized by adverse responses to seemingly trivial circumstances. The mentally impaired may cease to function effectively when facing such demands as getting to work regularly, having their performance supervised, and remaining in the workplace for a full day. A person may become panicked and develop palpitations, shortness of breath, or feel faint while riding in an elevator; another may experience terror and begin to hallucinate when approached by a stranger asking a question. Thus, the mentally impaired may have difficulty meeting the requirement of even so-called “low stress” jobs.

Because response to the demands of work is highly individualized, the skill level of a position is not necessarily related to the difficulty an individual will have in meeting the demands of the job. A claimant’s condition may make performance of an unskilled job as difficult as an objectively more demanding job, for example, a busboy need only clear dishes from tables. But an individual with a severe mental disorder may find unmanageable the demand of making sure that he removes all the dishes, does not drop them, and gets the table cleared promptly for the waiter or waitress. Similarly, an individual who cannot tolerate being supervised may be not able to work even in the absence of close supervision; the knowledge that one’s work is being judged and evaluated, even when the supervision is remote or indirect, can be intolerated for some mentally impaired persons. Any impairment-related limitations created by an individual’s response to demands of work, however, must be reflected in the RFC assessment.

We urge the Panel to incorporate the guidance provided in SSR 85-15 in its recommendations.

We also recommend that the Panel find methods to measure and evaluate the individual’s ability to withstand work environment stressors.

#### **IV. Job Accommodation**

Current and long-standing SSA policy does not consider “reasonable accommodation” in determining whether an individual can perform a specific job. We believe that this policy is appropriate and should continue.

The “reasonable accommodation” provision in the Americans with Disabilities Act (ADA) and the SSA disability determination process provide two different but complimentary remedies for individuals with disabilities. The main purpose of the ADA is to provide a clear and comprehensive mandate to end discrimination against persons with disabilities. Nothing in the ADA should be construed to limit any other federal law that provides greater or equal protection of the rights of persons with disabilities.

While concepts of disability under the Social Security Act involve broad, hypothetical vocational patterns, determining whether the ADA applies in a specific employment situation and whether it has been violated requires a number of *individual* assessments. The appropriate method of “reasonable accommodation” is determined on a case-by-case basis

involving evidence about the *particular* employment situation. Determining whether a *particular* accommodation imposes “undue hardship,” and thus is not required under the ADA, requires another individualized, case-by-case determination.

In contrast, there is no “reasonable accommodation” requirement in the Social Security Act. Instead, the issue of available jobs in *significant* numbers is addressed on a hypothetical basis under the Act’s statutory definition of disability. Trying to determine reasonable accommodations by a hypothetical class of employers for hypothetical jobs is thus antithetical to the purpose of the ADA.

Over the years, there are some who have attempted to merge the purposes of the ADA and the Social Security and SSI disability programs. However, the distinction between the two programs was recognized by SSA as long ago as 1993 when the former SSA Associate Commissioner for the Office of Hearings and Appeals addressed the issue when it first arose in some ALJ hearings. He noted:

Whether or how an employer might be willing (or required) to alter job duties to suit the limitations of a specific individual would not be relevant because our assessment must be based on broad vocational patterns ... rather than on any individual employer’s practices.

He concluded that “the ADA and the disability provisions of the Social Security Act have different purposes and have no direct application to one another.”<sup>8</sup>

The United States Supreme Court also has recognized that the two programs were designed for different purposes and can coexist. In *Cleveland v. Policy Management Systems Corp.*,<sup>9</sup> the U.S. Supreme Court noted that the Social Security Act provides cash benefits to individuals under a “disability” as defined in the Act, while the ADA “seeks to eliminate unwarranted discrimination against disabled individuals.”<sup>10</sup> The Supreme Court found that “there are too many situations in which an SSDI claim and an ADA claim can comfortably exist side by side” and thus held it would not apply a negative presumption that an individual who applies or receives SSDI cannot pursue an ADA claim.<sup>11</sup> The Supreme Court provided specific examples how the ADA and SSDI programs “can comfortably exist side by side.”

Specifically relevant to the Panel’s work, the Supreme Court described how the ADA defines a “qualified individual” to include a disabled person who can perform essential functions of a specific job “with reasonable accommodations,” a factor that is not part of Social Security statutory definition of disability. Thus, an ADA claim that a plaintiff can perform a specific job with reasonable accommodation “may well prove consistent with an SSDI claim that the plaintiff could not perform her own job (or other jobs) *without* it.”<sup>12</sup>

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<sup>8</sup> Memorandum dated June 2, 1993, from Daniel Skoler, Associate Commissioner of the Office of Hearings and Appeals [now known as the Officer of Disability Adjudication and Review].

<sup>9</sup> *Cleveland v. Policy Management Systems Corp.*, 526 U.S. 795 (1999). The Supreme Court cited to the Skoler Memorandum. *Id.* at 803.

<sup>10</sup> *Id.* at 801.

<sup>11</sup> *Id.* at 802.

<sup>12</sup> *Id.* at 803.

Introduction of the ADA into the disability process is not appropriate because the purposes of the two programs are not the same. The ADA ensures that persons with disabilities have equal access in both public and private arenas. The Social Security Act, on the other hand, provides cash benefits to persons determined unable to engage in substantial gainful activity.

\* \* \* \*

Thank you for the opportunity to submit these preliminary comments to the work of the Occupational Information Development Advisory Panel. We look forward submitting more comprehensive comments in response to the Panel's recommendations to be issued in September 2009.

Sincerely,

Ethel Zelenske  
Director of Government Affairs

## **User Needs and Relations Subcommittee Content Model and Classification Recommendations**

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# User Needs and Relations Subcommittee Content Model and Classification Recommendations

## Sub-Appendix B—Organizations and Conference List

### Organizations

Academy of Management <http://www.aonline.org/>  
American Association of People with Disabilities (AAPD) <http://www.aapd-dc.org/>  
American Board of Vocational Experts (ABVE) <http://www.abve.net/>  
American Occupational Therapy Association, Inc. (AOTA) <http://www.aota.org/>  
American Physical Therapy Association (APTA)  
<http://www.apta.org//AM/Template.cfm?Section=Home>  
American Psychological Association (APA) <http://www.apa.org/>  
Society for Vocational Psychology (SVP) <http://www.div17.org/vocpsych/>  
American Rehabilitation Counseling Association (ARCA) <http://www.arcaweb.org/>  
American Rehabilitation Economics Association (AREA) <http://www.a-r-e-a.org/>  
Commission on Rehabilitation Counselor Certification (CRCC)  
<http://www.crccertification.com/>  
Council of State Administrators of Vocational Rehabilitation (CSAVR)  
<http://www.rehabnetwork.org/>  
Human Factors and Ergonomics Society (HFES)  
<http://www.hfes.org/web/Default.aspx>  
International Association of Rehabilitation Professionals (IARP)  
<http://www.rehabpro.org/>  
IARP – SS/VE No website  
International Forum on Disability Management (IFDM) <http://www.ifdm2010.com/>  
National Association of Disability Examiners (NADE) <http://www.nade.org/>  
National Association of Disability Representatives (NADR) <http://www.nadr.org/>  
National Association of Forensic Economics (NAFE) <http://nafe.net/default.aspx>  
National Association of Service Providers in Private Rehabilitation (NASPPR)  
[https://nationalrehab.org/index.php?option=com\\_content&task=view&id=92&Itemid=104](https://nationalrehab.org/index.php?option=com_content&task=view&id=92&Itemid=104)  
National Council of Disability Determination Directors (NCDDD) No website  
National Council on Rehabilitation Education (NCRE)  
<http://www.rehabeducators.org/>  
National Council of State Agencies for the Blind (NCSAB) <http://www.ncsab.org/>  
National Organization of Social Security Claimants' Representatives (NOSSCR)  
<http://www.nosscr.org/>  
National Rehabilitation Association (NRA) <http://www.nationalrehab.org/>  
National Rehabilitation Counseling Association (NRCA) <http://nrca-net.org/>

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Rehabilitation Services Administration (RSA)

<http://www.ed.gov/about/offices/list/osers/rsa/index.html>

Society for Human Resource Management (SHRM)

<http://www.shrm.org/Pages/default.aspx>

Society for Industrial and Organizational Psychology, Inc. (SIOP)

<http://www.siop.org/>

### Conference List (in Chronological Order)

Dates – 2009	Organization	Location
October 5 – 9, 2009	NADE National	Covington, KY
October 14-17, 2009	NOSSCR	San Francisco, CA
October 19-23, 2009	HFES	San Antonio, TX
October 26-28, 2009	NCRE-RSA-CSAVR	Arlington, VA
October 29 – 31, 2009	IARP (Forensic Conference)	Memphis, TN
November 15-19, 2009	CSAVR	Phoenix, AZ
November 18-20	NCSAB	Phoenix, AZ
November 21 -23, 2009	NAFE (Southern Region)	San Antonio, TX
Dates 2010	Organization	Location
January 3 – 5, 2010	NAFE	Atlanta, GA
February 2010	APA (Division 22)	<b>TBD</b>
February 26 – 28, 2010	NAFE (Eastern Region)	Philadelphia, PA
March 26 – 28, 2010	ABVE	San Diego, CA
April 8-10, 2010	SIOP	Atlanta, GA
April 29-May 2, 2010	AOTA	Orlando, FL
May 12-15, 2010	NOSSCR	New Orleans, LA
June 16-19, 2010	APTA	Boston, MA
September 11 – 16, 2010	NADE	Albany, NY
September 20-22, 2010	<a href="#">IFDM</a>	Los Angeles, CA
September 22-25, 2010	NOSSCR	Chicago, IL
September 27-October 1, 2010	HFES	San Francisco, CA

OIDAP Quarterly Meeting Dates:

- September 16-17, 2009—Los Angeles, CA
- December 1-3, 2009—TBD
- March 2-4, 2010—TBD
- June 8-10, 2010—TBD
- August 31-September 2, 2010—TBD

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**Sub-Appendix C—SSA User Needs Analysis**

*Final Findings*

<b>PHYSICAL JOB DEMANDS</b>	<b>ADDITIONAL INFORMATION</b>
Lifting	<p>Need more detailed information about lifting requirements. How heavy are the objects that are going to be lifted? Does the individual have to lift their own body weight?</p> <p>Need duration / frequency measures</p> <p>Bilateral vs. unilateral</p> <p>Specify jobs that don't involve lifting.</p> <p>Can it be done with one arm/hand or does it require both arms/hands?</p> <p>Where is object located and where is it being moved to (e.g., floor to overhead shelf). Body position when lifting? (e.g., overhead, with bending, floor to waist, waist to floor)</p> <p>Need more specific measurement information. The intervals in the existing DOT are unrealistic.</p> <p>What is the size/shape of object being lifted?</p> <p>Does lifting involve both upper and lower extremities or does it only require upper?</p> <p>Are tools or assistive devices used or is the individual required to lift alone, unassisted?</p> <p>Would like to see lifting data separated from carrying data.</p>

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Carrying	<p>How far does the job require the individual to carry something?</p> <p>How often does the job require the individual to carry something (frequency)?</p> <p>Can the object be carried with only one arm/hand?</p> <p>Dominant hand/side of the individual</p> <p>Bilateral vs. unilateral</p> <p>Need more specific measurement information. Intervals in the existing DOT are unrealistic.</p> <p>Where is the object located /where is it being moved to?</p> <p>What is the size/shape/weight of the object being carried?</p> <p>How long must an individual carry something before they are aloud to take a break (duration)?</p> <p>Are tools or assistive devices used or is the worker required to carry an object without being assisted?</p> <p>Would like carrying data separated from lifting data</p>
Standing	<p>Need to have better measures for frequency and duration in order to provide more detail.</p> <p>How long is the individual required to stand?</p> <p>Provide separate measures for standing, walking, and sitting.</p> <p>Standing and bending do not match up with work history and RFC.</p> <p>Other term used: Station</p>

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Walking	<p>Need to change measure of frequency to provide more detail.</p> <p>Is walking with a cane ok?</p> <p>How long is the individual required to walk before they can rest?</p> <p>Need to provide separate measures for standing, walking, and sitting.</p> <p>How fast is the pace?</p> <p>How far is the individual required to walk?</p> <p>How often is the individual required to walk? Is it repetitive?</p> <p>What is the total time an individual is required to walk?</p> <p>Is the individual required to walk on an even grade, uphill, or on uneven terrain?</p> <p>Other term used: Gait</p>
Sitting	<p>Need to change measure of frequency to provide more detail.</p> <p>How long is the individual required to sit?</p> <p>Is an individual required to sit in the same position for extended periods of time?</p> <p>Provide separate measures for standing, walking, and sitting.</p>

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Pushing	<p>Hand or foot controls /pedals – does the job require someone to drive (push in a clutch).</p> <p>Bilateral vs. unilateral</p> <p>Levers, buttons, knobs – how much force is required to push in? Where are the controls located? Frequency of manipulation and distance between controls.</p> <p>Include both upper and lower extremities</p> <p>Need to separate from other measures instead of including it in definition of strength level of occupation (i.e., sedentary, light, medium, etc).</p> <p>How long required to push?</p> <p>Can object be pushed with only one hand/arm?</p> <p>Dominant hand/ side of the individual</p> <p>Body position while using controls</p>
Pulling	<p>Bilateral vs. Unilateral</p> <p>Dominant hand /side of the individual</p> <p>Include both upper and lower extremities</p>
Shoveling	
Unloading	
Climbing	<p>Need more detailed information such as a breakout of the various kinds of climbing (e.g., stairs, ladders, ropes, scaffolding, etc), and the frequency.</p> <p>Need better measures than occasionally and frequently.</p> <p>Can job be performed by an individual who has use of only one arm/hand?</p> <p>Are assistive devices such as ramps available so that the individual doesn't have to climb stairs?</p>

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Balancing	<p>DOT definition of balancing is not helpful. For instance, it would be nice to know if the job requires an individual to work on an elevated platform.</p> <p>Definition of balancing needs to be more descriptive and appropriate to people who are disabled</p> <p>If you only had one hand, would that be an issue in the workplace?</p> <p>Need better measures than occasionally and frequently.</p> <p>Can employee use a cane?</p> <p>See section on Workplace Tolerances, Flexibilities, and Standards.</p>
Stooping	<p>Some asked for better measures than occasionally and frequently while others liked these quantifiers.</p> <p>Need to have a measure that addresses when a person must stoop and twist or stoop and reach simultaneously.</p> <p>Need better frequency and duration measures.</p> <p>Need a better name for stooping. Please rename as “bending forward at the waist.”</p> <p>Need more detailed information as to the manner and to the location that the individual bends (e.g., side to side, straight down, bending to the ground, etc). Also need information as to why individual needs to stoop.</p> <p>Standing and bending do not much up with work history and RFC.</p> <p>Other term used: Bending</p>
Kneeling	<p>Need better measures than occasionally and frequently (better frequency measures in particular).</p> <p>How long is the individual required to maintain position?</p>

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Crouching	<p>Need better measure than occasionally and frequently.</p> <p>Need better frequency measures</p> <p>“Likes quantifiers of occasional, frequent, and constant.” They interpret occasional to mean - “Might be expected at some point in a work day but not every work day.” “Frequent” means once an hour.</p> <p>Other terms used: bending, squatting</p>
Crawling	<p>Need better measure than occasionally and frequently.</p> <p>“Likes quantifiers of occasional, frequent, and constant.” They interpret occasional to mean - “Might be expected at some point in a work day but not every work day.” Frequent” means once an hour.</p>
Reaching	<p>Bilateral vs. unilateral</p> <p>Need to define specifically in what direction and at what level (arm level, waist level, to the floor).</p> <p>How far does a person need to reach? Above head?</p> <p>Does hand /side dominance matter?</p> <p>How often (frequency) and for how long (duration)?</p> <p>Need to describe if the individual is holding something while reaching. If yes, what is the weight of the object?</p> <p>Can the job be done by an individual who has only one arm/hand?</p> <p>DOT odes not match up with RFC vocabulary for reaching (make more uniform). That is, DOT has constant, frequent, occasional, and never.</p>
Reaching Overhead	<p>Need better frequency measures</p> <p>Bilateral vs. unilateral</p> <p>Does the individual hold objects in hand when reaching overhead?</p>

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Handling	<p>Bilateral vs. unilateral</p> <p>Need better frequency measures</p> <p>Repetitive motion?</p> <p>Does the individual need to grasp small, medium, or large objects?</p> <p>Would hand dominance matter in performing a task?</p> <p>Does task require work to handle something and be able to rotate or twist their wrist?</p> <p>Can the job be done by an individual who has use of only one hand?</p> <p>Other terms used: gripping, holding, and manipulating objects</p>
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Fine motor skills	<p>Bilateral vs. unilateral</p> <p>Typing</p> <p>Writing/writing instruments</p> <p>Grasping small objects</p> <p>For gripping /grasping, how much force or strength is required?</p> <p>Does hand dominance matter in performing a task?</p> <p>Flexing with hand</p> <p>Need information on what's being picked up. For example, a coin or button.</p> <p>Finger dexterity required?</p> <p>Utensils</p> <p>Need better measure for things such as fingering. Frequency and duration are important.</p> <p>Need to twist wrist?</p> <p>Other term used: fine manipulation, fingering, gripping, grabbing, picking, pinching, holding, grasping</p>
Feeling	<p>Is dominant hand impaired?</p> <p>Bilateral vs. unilateral</p> <p>Need better measure for frequency / repetitive motion.</p>
Bilateral vs. unilateral manipulation	<p>Does the job require an individual to use one arm or hand? Does the job require them to use both?</p> <p>Can you use one hand for work and the other for assistance (to brace yourself)?</p>
Coordination	
Physical pace	

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Speed of movement required	For example, to avoid hazardous situations. Other term used: rapid, full body movements
Agility of movement required	For example, to avoid hazardous situations.
Running	
Jumping	
Include not just “occasional,” “frequent,” etc measures, but also measure of repetitive physical movements	
Repetitive tasks	Do tasks require a repetitive motion (typing, handling tool, etc)?
Keyboarding	
Flexing with knee	
Twisting	Twisting neck/head, torso/trunk, Other term used: rotation
Twisting Torso	Other term used: rotating trunk, turning, rotation
Rotation of neck	Need more information in this area What direction is the neck rotating – up, down, etc? Other term used: neck extension
Need to sustain full-time employment	Can individual maintain a full 8 hr. day? Other terms used: Fatigue, endurance, stamina.

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<p>Does workplace provide worker with the flexibility to change position when needed?</p>	<p>Can individual sit/stand at will at the work location?</p> <p>Does person need to lay in one position all day?</p> <p>How long is the individual required to sit/stand before they can change positions?</p> <p>Need measure of frequency at which individual can change position and how far individual can move away from workstation in order to change position.</p> <p>Can individual elevate his foot/leg during the workday?</p> <p>See section on Workplace Tolerances</p> <p>Other terms used: Sit/Stand Option and Alternate sit/stand.</p>
<p>Can worker use an assistive device at work?</p>	<p>Cane, crutch, wheelchair, oxygen tank, mask, special telephone, visual aids, robotic devices, voice activated/talking software, voice activated computers</p> <p>Software that reads a computer screen to the visually impaired</p> <p>Would using a cane, for example keep the individual from carrying any objects he/she would be required to carry?</p>

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<b>SENSORY JOB DEMANDS</b>	<b>ADDITIONAL INFORMATION</b>
Hearing	<p>Can individual still perform job with out being able to hear? –Safely?</p> <p>How noisy is the environment? If noisy, is sound cancelling equipment available?</p> <p>Need information on frequency of sound (high or low).</p> <p>Does the individual need to be able to hear hazards such as machinery?</p> <p>Are there warning bells that must be heard? What is the decibel level of the warning bell?</p> <p>Does job require you to receive instructions verbally?</p> <p>Does job require you to hear / understand normal conversation? What about hearing someone who is speaking in a low voice?</p> <p>Some jobs have specific requirements for hearing. How much hearing is required to perform a specific job? Can claimant perform job within the available workplace flexibilities?</p> <p>Does the job require the individual to be able to talk on the telephone?</p> <p>Understanding social cues</p> <p>See section on Workplace Tolerances, Flexibilities, and Standards (Workplace Accommodations)</p>

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Speech	<p>How much speaking is needed (frequency, volume, and duration)?</p> <p>Does individual have to speak quickly (e.g., to give a warning)?</p> <p>Does individual have to speak English or a foreign language?</p> <p>Can individual perform job without being able to speak?</p> <p>Does speech need to be loud (e.g., to be heard over a noisy environment)?</p> <p>Does the individual need to request information from others?</p> <p>How much speech discrimination does the job require? Does an individual need to be able to articulate?</p> <p>Can an individual be understood with any limitations in speaking? With regional differences?</p> <p>See section on Workplace Tolerances, Flexibilities, and Standards (Workplace Accommodations)</p>
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Vision	<p>How far away are the visual stimuli? For example, is the individual looking at a computer screen or documents (reading) all day or into the distance? Near vs. distance vision. Is a full range of vision needed or does the individual focus only at a specific distance?</p> <p>Does worker need to see small, medium, or large objects?</p> <p>Need information about the context or reason for which the worker needs to see.</p> <p>Depth perception required</p> <p>Visual fields – at which point can an individual no longer perform a task?</p> <p>Degree to which peripheral vision is required to see hazards and to avoid hazards in the workplace.</p> <p>Can the job be performed if individual has vision in only one eye (good eye is 20/20)? Monocular vs. binocular vision. Does job require a minimum level of visual acuity (e.g., 20/60)?</p> <p>Contrast/clarity</p> <p>Brightness versus dimness of lighting. See information about lighting in section on environmental conditions.</p> <p>Vision needed to avoid hazards in workplace? Can a person with limited vision be safe and keep others safe on the job? Presence of an obstacle that might be difficult for someone with a vision problem to see.</p> <p>Does the job require the individual to walk on ramps or over uneven terrain?</p> <p>Can a colorblind individual perform the occupation?</p> <p>See section on Workplace Tolerances, Flexibilities, and Standards</p> <p>Other term used: Peripheral vision needed</p>
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Tasting	
Smelling	

<b>ENVIRONMENTAL CONDITIONS</b>	<b>ADDITIONAL INFORMATION</b>
All	Need better measures of environmental conditions, including how concentrated the exposure is and how frequent the exposure is. Need better measures of frequency and better definitions. Need to make sure the levels described are measurable.
Exposure to extreme cold	
Exposure to extreme heat	
Exposure to wetness	Other term used: moisture, wet, rain
Exposure to humidity	Need a measure of the degree of humidity
Exposure to noise or loud work environments	If noisy, is sound canceling equipment available?
Exposure to heavy vibrations	
Exposure to fumes	
Exposure to odors, perfumes, or hairspray	
Exposure to dust	
Exposure to gases	

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Exposure to hazardous work areas	<p>Physical and mental response time needed to avoid injury in dangerous jobs. How dangerous is the job?</p> <p>Working at heights. Protected versus unprotected heights. Description of height (e.g., ladder, scaffolding, stairs, ropes, etc.).</p> <p>Working around or operating machinery</p> <p>Working around or operating heavy equipment</p> <p>Work involving driving</p> <p>Potential electric shock</p> <p>Does work environment contain hazards on the floor that would impede someone's movement (e.g., boxes on office floor)?</p> <p>Does work involve the use of a weapon?</p> <p>Working around bright lighting</p> <p>Would dropping something cause a safety problem?</p>
Exposure to mold or mildew	
Exposure to feathers	
Exposure to chemicals	Other term used: contaminants or pollutants
Exposure to smoke	
Exposure to paint	
Exposure to allergens	
Exposure to irritants	
Exposure to a clean environment	
Exposure to magnetic fields	
Exposure to electrical fields	There are issues with prosthesis and pacemakers

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Exposure to electricity	
Exposure to poor ventilation	
Walking surfaces	Are the surfaces for walking smooth, ruff, cement, slippery, carpet, uneven?
Exposure to pet dander	
Is worker exposed to confrontations?	
Is worker exposed to distractions?	
Is work located in a public place or in a private office?	
Is work located indoors or outdoors?	
Is work located in a crowded place?	
Does worker have to use technology to carry out tasks?	For example, a phone or computer.
Is office air conditioned?	
Ergonomics	Does the job provide for the environment to be manipulated by the employee?  Can you adjust your work station?  Can you work either standing or sitting (see section on physical job demands)?
Does worker have ready access to a bathroom?	
Lighting	Degree of lighting and type of lighting. For example, natural versus artificial lighting, measured in foot candles

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Is work performed during the day or at night?	
Is worker required to drive?	
Can individual work part time if needed?	
Does the job involve working with children?	

MENTAL JOB DEMANDS	ADDITIONAL INFORMATION
Cognition	<p>Ability to understand multi-step, complicated instructions</p> <p>Can individual function at higher levels?</p> <p>Simple/detailed/complex abilities needed (e.g., problem solve, make judgments, perform high level math)?</p> <p>Is the individual consistent in task completion?</p> <p>See section on Task Information</p>
Intelligence	<p>Need information similar to DOT's SVP.</p> <p>Knowledge</p> <p>Ability to organize</p>

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Job Complexity	<p>Need information about simple vs. complex job tasks</p> <p>Need a standardized measure</p> <p>How long does it take to learn a job?</p> <p>How often does knowledge need to be refreshed?</p> <p>How often does new information need to be learned?</p> <p>We currently use SVP for complexity, but SVP doesn't provide enough information.</p> <p>See also task information chart</p>
Mental processing speed needed?	<p>Example, quick thinking may be needed to respond quickly to dangerous environments and to get out of harms way.</p>
Literacy	
Counting	
Reading	
Writing	<p>Does the job require an individual to possess a certain level of writing skills (including refined grammar and spelling)?</p> <p>Does the job require them to type?</p>
Word Manipulation	
Mathematical Skills	

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Need to give/receive instructions	<p>How does an individual receive instructions? Written? Verbal? Visual?</p> <p>Does the individual need to give or receive simple, detailed, or complex instructions?</p> <p>How many steps are they required to learn?</p> <p>Degree to which instructions must be understood.</p> <p>Other term used: comprehension</p>
Memory	<p>Remembering simple instructions versus detailed instructions.</p> <p>Does an individual have to remember work procedures and operations?</p> <p>Need a better measurement. Need to know the degree and length of memory requirements. For instance, what is the need in the workplace for short-term and long-term memory? How long do they have to remember instructions?</p>
Attention	<p>Does job require the individual to pay attention to detail?</p> <p>Does the job require the individual to pay close attention to task at hand?</p> <p>How long must an individual maintain attention to a task?</p> <p>Can an individual be off task for periods but still get the job done?</p>
Focus	<p>How long is an individual required to maintain focus on a task? Fine details?</p> <p>How complex is the task?</p> <p>We need a better measure for observing tasks in general.</p> <p>Other term used: attention</p>

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Concentration	<p>What period of time does a person have to concentrate before they can have a break in concentration?</p> <p>It would be helpful to have information about the presence of distractions in the workplace. For example, type, degree, and frequency of distractions.</p> <p>Need to have a better, quantifiable, verifiable measure.</p> <p>Need to be able to crosswalk mental status exam to OIS and mental residual functional capacity.</p> <p>Need information on the intensity of concentration required, the maximum length of time required to concentrate, and the complexity of material (e.g., “unskilled” vs. “skilled”; 1-2 step tasks versus a greater number of tasks).</p> <p>Do they have to multi-task?</p> <p>The amount of training involved</p> <p>Better definitions for concentration, focus, attention, etc.</p> <p>Degree of watchfulness vs. intense attention</p> <p>Being able to focus on the basic task at hand is different than being able to perform a task where you have to implement or carry out tasks and perform them correctly, on time, etc. We need to separate these out and redefine them because people are using them interchangeably even though they really mean two different things.</p>
Persistence	<p>Does an individual give up easily?</p> <p>What is the need to carry out instructions?</p> <p>Need to know degree and length of persistence requirements.</p>

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Pace	<p>Need to know the degree and length of pace requirements</p> <p>Are there production quotas and deadlines that need to be met?</p> <p>Currently, pace is defined in a very broad manner. Please make industry specific and job specific.</p>
Ability to keep a schedule	<p>Can they perform tasks on their own or do they need supervision?</p> <p>Can the meet deadlines?</p>
Complete a work day and a work week without interruption	<p>Can a person work eight hours a day, five days a week?</p> <p>Can a person work in 12 hour increments?</p> <p>Other terms used: mental fatigue, stamina</p>
Interaction with general public	<p>Does the individual work with the general public?</p> <p>How closely does the individual work with the general public?</p> <p>The DOT doesn't have enough information regarding public contact.</p> <p>Need better measures for frequency, intensity, degree and length of contact.</p> <p>What is the method of interaction? For example, is interaction superficial, in-depth, or adversarial?</p>

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<p style="text-align: center;">Interaction with supervisor</p>	<p>Degree of supervision given/required/available. For example, is constant or minimal supervision needed?</p> <p>How closely does an individual have to interact with their supervisor?</p> <p>What is the frequency of criticism?</p> <p>Degree of worker autonomy.</p> <p>With how many levels of management does individual have to interact?</p> <p>Does individual have to interact with supervisors who are known or unknown?</p> <p>Need measures for type, frequency, intensity, complexity, and length of contact (e.g., is interaction superficial or in-depth)</p> <p>With what type of management does the individual have to interact (e.g., does the person's supervisor manage by terror or kindness)?</p>
<p style="text-align: center;">Interaction with other workers</p>	<p>Does individual work alone, in a team, or a group?</p> <p>With how many other workers does an individual work?</p> <p>Need measures for frequency and degree (e.g., intense, superficial, close, helpful).</p> <p>Need measures for type, frequency, intensity, complexity, and length of contact (e.g., is interaction superficial or in depth)</p> <p>Does the individual have to interact with coworkers who are known or unknown?</p>
<p style="text-align: center;">Tolerating others behaviors</p>	
<p style="text-align: center;">Accept criticism</p>	<p>Does an individual need to be able to accept criticism?</p>

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Adaptability	<p>Degree of change associated with occupation. For example, how often and to what degree do the tasks change?</p> <p>Ability to respond quickly to changes</p> <p>Degree of change associated with work processes, work hours, work setting, and people with whom the individual interacts.</p> <p>Need some type of adaptability score.</p>
Degree of precision, accuracy, and quality required	
Decisionmaking	<p>Does an individual need to make independent judgments and decisions?</p> <p>How quickly do decisions have to be made?</p> <p>How many decisions have to be made?</p> <p>Other terms used: Executive Functioning</p>
Judgment	
Motivation	
Can an individual function fully independently or do they need supervision or assistance (e.g., job coach)?	
Level of responsibility	<p>Does the individual need to supervise someone else?</p> <p>Do decisions affect the life, death, large numbers of people, or the health of the company?</p> <p>Do decisions affect individuals directly, such as hiring and firing?</p> <p>Is there accountability for decisions made?</p> <p>Level of responsibility could be a stressor.</p>

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Level of authority	<p>Information on the level of authority the worker needs to exert. For example, bouncer, policeman, ticket taker, crowd control, or phone contact with no authority exerted.</p> <p>Ability to supervise. Details about tasks (type and frequency) that the person can manage.</p>
Communication	<p>What methods of communication does the job require an individual to engage in? For example, is it over the phone, face to face, through the mail, using a computer, etc?</p> <p>Can they be understood? Are there any limitations in speaking?</p> <p>What is their ability to communicate? Are they clear, consistent, effective?</p> <p>Are they able to articulate?</p> <p>Word finding capabilities</p> <p>Other term used: Speech</p>
Ability to speak English	<p>Does individual need to speak English?</p> <p>Are there regional differences in requirements to speak English?</p>
Ability to communicate in a foreign language	<p>Is foreign language fluency required?</p> <p>Are there any local requirements to speak a specific foreign language?</p>
Degree of structure present in the workplace	
Degree of discretion required	

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Additional stress factors	<p>Does the job have deadlines?</p> <p>Public speaking</p> <p>Working with hazardous, explosive materials</p> <p>Decisionmaking</p> <p>Does the worker also supervise the tasks they perform?</p> <p>Does the job involve piece work?</p> <p>Pace of production?</p> <p>Production rate or quotas?</p> <p>Supervisory criticism</p> <p>Responsibility and making independent judgments</p> <p>What are the consequences for failure (would someone die)?</p> <p>Does individual have to deal with new or unknown people? How well does worker get along with coworkers?</p> <p>Define stress in workplace terms</p> <p>Does individual produce for next person on assembly line or does individual complete the task him or herself?</p>
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<b>TASK INFORMATION</b>	<b>ADDITIONAL INFORMATION</b>
Measurement	Need better instrument for observing tasks
Is task or job repetitive?	
Is task routine?	Do tasks stay the same or do they change? How often does the individual face novel situations?
How many steps in each task?	1 to 2 step tasks versus a greater number of steps How is task sequenced?
How complex is the task?	Simple vs. Complex / Skilled vs. Unskilled Does the task involve rational decision making?
How long does it take to learn the task?	
How long to complete a task?	Does the task have to be completed within a specific time period in order to meet a deadline?
What training is involved in learning the task/job?	
How many tasks is a worker required to perform at one time?	Does the worker need to be able to multi-task such as listen and type at one time?
Amount of paperwork involved?	
Does the task require handling money?	
To what degree is the job automated?	

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Assembly work	<p>If assembly work, does the individual do entire process or a part of the process?</p> <p>Is there a conveyor belt with a fixed pace?</p> <p>Is there is an assembly line with multiple employees? If one slows down will it affect the others?</p> <p>Are there production requirements or quotas?</p>
Accuracy in task completion	How accurately does a task need to be performed?
Technology involved in task completion	Are workers required to use phones, computers, or other technology?

<b>WORKPLACE TOLERANCES, FLEXIBILITIES, AND STANDARDS</b>	<b>ADDITIONAL INFORMATION</b>
Tolerance for workers taking breaks when needed	<p>Can individual take unscheduled breaks, as needed? To take medications? Longer breaks to use a bathroom frequently? Does individual have ready access to a bathroom?</p> <p>What is the tolerance for taking more frequent breaks and rest breaks, for example, to be able to rest when short of breath from walking?</p>

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<p>Tolerance for workers changing positions when needed</p>	<p>Can the individual sit or stand at will at the work location?</p> <p>Need a measurement of frequency at which the individual can change positions.</p> <p>Need a measure of how far individual can move away from workstation in order to change position. For example, is the individual required to stay in same physical position or can they move?</p> <p>See section on Physical Job Demands.</p>
<p>Does or can worker work alone?</p>	<p>If an individual usually works with others, is there a workplace tolerance that would allow him or her to work alone?</p> <p>How much supervision is needed?</p>
<p>Workplace options</p>	<p>Is voice activated software readily available?</p> <p>Is software that will read the computer screen to visually impaired individuals readily available?</p> <p>Seeing-eye dog.</p> <p>Can an individual use a wheelchair or cane at work? What about an oxygen tank or mask when working with chemicals? Are ramps available so that workers don't have to climb stairs?</p>
<p>Tolerance for absences</p>	<p>Can claimant sustain a 40 hour work week?</p> <p>Can claimant sustain an 8 hour day?</p> <p>Are there specific attendance policies?</p> <p>How many absences would be tolerated? Frequent absences?</p> <p>Other term used: Frequent absences</p>
<p>Tolerance for workers who are not punctual</p>	<p>Other term used: tardiness</p>

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Flexible work schedule vs. fixed	Flexible vs. nonflexible break and lunch schedules Flexible starting and ending times
Can individual work from home?	Can job be performed offsite or does person have to be at worksite (flexiplace)?
Tolerance for distracting other employees	
Tolerance for socially inappropriate behavior	
Tolerance for reduced production rates	
Tolerance for making mistakes	
Tolerance for missing deadlines	
Tolerance for worker being distracted	
Are licenses required?	
Are there any national standards, such as OSHA or FAA, that apply to the occupation that would preclude an individual with a certain limitation or impairment from performing that occupation? If so, what are the national standards for each occupation?	
Need to address personal hygiene	

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### **General Concerns and Suggestions**

#### General Suggestions / Wish List / Concerns for OIS

- You will need to obtain internal agency buy-in.
- You will need to maintain external oversight of the project.
- We would like to have a 20 second video of each job.
- The new OIS should be constantly updated because technology and jobs change.
- We would like to be able to make direct comparison between an individual's RFC and the requirements of jobs.
- We would like the information that we receive from the claimant, given the way claimants describe that information, to be directly linked, through the OIS, with the information we receive from doctors, given the way doctors describe that information.
- We need to know, in general, whether a manager performs the job they are managing. This is particularly important for manual labor jobs.
- The occupational title needs to include both physical and mental demands of work.
- We need information about tools and equipment needed.
- We need a better tool for measuring the exertional level of jobs. We do not like the classification of work in terms of sedentary, light, medium, etc.
- We need the types of limitations of upper extremities that we see in disability claims to be reflected in the explanations of work requirements. This is not currently the case with the DOT.
- We need information about whether or not a dominant arm limitation would reduce the range of work that someone can do. Currently, this is not factored into the range of work required or described in DOT.
- We need a way to resolve the differences in the way the claimant describes his or her work with the description of work in the national economy.
- We need more specific information about exertional limitations.

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- Need to improve the claims intake procedures. We need a way to help claimants identify their past work. We need a way to get better information from the claimant. We think this can be done by the new OIS and an interface between its database and the application.
- We need information about military jobs.
- We need ways to understand composite jobs and to adjudicate claims with composite jobs. For example, is there a way to tell if the composite job meets the requirements of past relevant work (e.g., length of job, was it SGA, etc.).
- We would like to be able to trace career paths in the new OIS. For example, from cashier, you could identify the supervisor, then the manager, and vice versa.
- The new OIS should tell us how many hours a week were spent for each activity (e.g., tasks, walking, standing, etc.).
- See information in “Software” and “Claim Development” about the SSA-3368, SSA-3369, and eCAT.
- For the mental RFC, the categories need to have better, more defined measures with an appropriate crosswalk to the OIS.
- The DOT exertional levels obscure the existence of work. For example, some light jobs don’t require lifting or standing, but work is called light because of high production rate.
- We would like the functions that are now combined in the exertional levels (sedentary, light, medium, etc) to be separated out and reported separately. We would like separate ratings for walking, standing, sitting, lifting, carrying, pushing, pulling, etc.
- Provide information about the job demands (e.g., actual weight lifted) for each task (work activity) performed in an occupation.
- We would like information about the percentage of the day spent at the different exertional levels (after they have been disaggregated per the previous statement). For example, a policeman might stand 50% of the day, walk 20% of the day, and sit 30% of the day (while filling out paperwork or riding in a car).
- If ranges of the exertional levels of work are provided, as in the DOT, make sure that the ranges are consistent.

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- The new OIS should interface and work in conjunction with eCAT, the SSA-3368, etc.
- We need information on composite jobs and combinations of jobs.
- We need to know how long it takes to learn the job.
- The same job may be called by many different names by different people and different groups. We would like the system to use the common name for a job, but to identify other names for the same job, with the ability to crosswalk and search by all the names.
- We would like to know the incidence of occupations.
- We would like the new OIS to be updated frequently, so that it doesn't get out of date.
- We would like the new OIS to describe foreign work.
- We would like the new OIS to provide the locations of the occupations.
- We would like the new OIS to identify occupations according to our program rules and provide a cross-referencing system.
- We should be capturing, as structured data (not text), the work history information that people give us when they file their claims. This could help, for example, to identify the common names of jobs.
- We should also be capturing, as structured data (not text), the reasons that the person stopped working. By comparing the reason for stopping work with the work history, we could determine specific difficulties that claimants are having with specific jobs. This could then lead to research that might help us rule out certain occupations for individuals with specific functional limitations.
- We are concerned about the measures for environmental restrictions. The RFC and the new OIS should correlate better than current RFC and DOT.

### Skills in the OIS

- We would like to have a list of core skills or work activities, with the most essential skills or work activities listed first. We would like these skills or work activities to be searchable by the job. We would like these skills or work activities to be available to the claimant when he or she completes

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the forms. This would make it easier for the claimant and would provide us with better information about past work history.

- TSA: We need a tool that is dynamic.
- Describe “soft skills” of talking to and listening to people. Is this related to education, work experience, or other learned behavior? For example, if you have “management” skills in one area, do these skills relate to management in other businesses?
- Provide a better definition of skills versus traits. That is, define skills clearly.
- Identify skills using common language and definitions. Either use a common language to identify skills or cross-reference similar skills that have been identified using different names or synonyms.
- Eliminate the distinction between “skilled” and “unskilled” work. Instead, provide detailed occupational information about the number of steps involved, the training required, the degree of complexity involved, and the skill required.
- We need a better measure for the gradations between lower sets of skilled work.
- We need better information about skills, intellectual skills, and skills within industries.
- We need better information about other occupational classification systems and how they relate to transferable skills analysis.
- We need information regarding the likelihood of a seamless transfer of skills from one occupation to another.
- We need information about skill level. Skill level might equal the number of steps, the complexity of the steps, and the tasks performed. The current numeric scale of SVP doesn’t provide a lot of information.
- We need information about primary skills versus secondary skills.
- For transferable skills analysis, we need information about work settings and work processes.
- We need to know the types of machines and tools the worker uses.

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- We would like a search engine for transferability of skills. The search engine would either provide the occupations a person could do or a list of potential occupations that a person could do.
- We would like a search engine that would take age into account for transferable skills analysis.
- We need computer software to support our transferable skills analyses.

### Software application / Database for the OIS

- Computer support should be available to the claimant and the field office to make the documentation process easier.
  - We could provide the claimant and the field office with the information SSA already has about the claimant's work history.
  - We could provide the claimant and the field office with the database of occupational information from which to select the claimant's occupation.
  - If the claimant and field office selected occupations from the occupational information database, then the information about how the job is done in the national economy could be pre-filled on the application and the claimant could make necessary changes.
  - Computer support should be given to the claimant to make sure the numbers add up correctly. That is, the claimant is asked, for example, how many hours he or she stood on the job, how many hours he or she walked on the job, etc. It is possible for the totals to go over the number of hours the claimant worked each day.
- Describe jobs by both skills and residual functional capacity factors (e.g., weights, etc.) so that adjudicators can readily identify jobs to which someone's skills would transfer.
- Provide functionality so that the database can be searched by skills, by exertional levels, and by other limitations.
- Include in the tool the vocational factors of age, education, and work experience.
- Provide functionality for dealing with the erosion of the occupational base. For example, how much does each limitation or restriction erode the

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occupational base? How much would a combination of limitations and restrictions erode the occupational base?

- If occupations were classified according to actual weights lifted/carried, actual time spent standing/walking/sitting, etc., then the tool could contain functionality for searching by each of these factors (e.g., the actual weight lifted rather than by the exertional level).
- Include new jobs; update job descriptions and requirements.
- We need information about composite jobs and core tasks. For example, how do “other” tasks affect whether job meets occupational definition or is a composite job? Would working 50% outside of core tasks meet occupational definition? What about 30% of the time?
- We need detailed national information about existence of occupations/jobs.
- We need detailed occupational information to compare with vocational expert (VE) testimony.
- What if the claimant can’t do all but can do some of the tasks that are required by the capsule definition of an occupation? It would be helpful to know what is required (i.e., job demands) to do each task. It would be helpful to know the percentage of time (e.g., day, week, etc.) a job incumbent spends doing each task.
- The computer software for the new occupational information system should:
  - Offer enhanced search capabilities on multiple criteria.
  - Integrate the occupational database with SSA’s vocational rules.
  - Incorporate an employer database to make identifying past work history easier.
  - Provide a way for the disability examiner’s to save examples of jobs for later reference.
  - Not “time out.”
  - Provide an electronic tool that would incorporate disability policy, such as “consultant on demand.”

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- Link the SSA-3368 with the software that is developed to make the process more efficient.
- Propagate the information from one software program to another so that we don't have to keep retyping the same information.
- Provide a crosswalk between the disability forms that claimants fill out and the RFC form and the software containing the OIS.
- Identify the claimant's skills based on information about his or her past relevant work. Tell us whether or not there is an occupation the claimant could perform based on a comparison of his or her past relevant work and RFC.
- Tell us whether or not there is an occupation the claimant could perform based on transferability of skills.
- Provide a more user friendly search engine. There are current problems with the way jobs are listed.
- Provide alternate "key words" terms (e.g. thesaurus).
- Provide functionality to query skills and/or limitations based on input of a claimant's relevant past work.
- Computer system:
  - We would like a good search engine.
  - We would like to be able to identify jobs by searching by tools or tasks.
  - We would like better keywords. We would like keywords to be associated with specific fields.
  - We would like a way to overcome misspellings. That is, we would like to be able to find jobs even if we misspell the keyword.

### Claim Development Procedures with the OIS

- The process for documenting the claimant's work history needs to be improved. For claimants over 50 years old, this is among the most important information in a file.

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- We suggest revising the SSA-3369, the Work History Questionnaire. We need an electronic version of the form for reporting work history.
  - There should be a prompt for specific work.
  - There should be an edit on the length of time a claimant reports doing a specific activity to ensure that the length of time reported, for example, for combined standing, walking, and sitting, does not exceed the number of hours he or she worked.
  - There should be a place to record the time the claimant spent doing each task.
  - The form should capture tasks related to mental functioning and social interaction.
  - SSA should do usability testing on the form to make sure it is appealing, better looking, and user friendly. The current form is not user friendly.
  - The SSA-3369 should ask for information about the mental demands of the claimant's past work and for the job functions of past work.
  - Documenting the claimant's work history should be part of the filing process and should be completed before the case goes to the DDS.
  - We should be propagating into the electronic SSA-3369 the information that SSA already has about the claimant's work history. For example, the NDNH query breaks down work information into quarters; the DEQY provides information about annual earnings and employers.

### Claim Development Procedures - General

- We need to improve the process for obtaining activities of daily living (ADLs) information from the claimant.
  - The national form is too complicated.
  - Rather than capture information about the claimant's ADLs, the current form provides additional opportunity to elaborate on allegations.

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- The national form needs to be improved regarding the type of information required on the form:
  - Eliminate check boxes.
  - Eliminate questions which ask the claimant to describe limitations.
  - Add questions asking claimant to tell us about actual activities.
  - Use open-ended questions, for example, ask “How do you take care of your meals?” rather than detailed questions about cooking.
  - Ultimately, we need the claimant’s story of the difficulties he or she has because of medically determinable impairment.
- We need to do more with the ADLs. We need to get third party ADLs.
- We need to increase the frequency with which we obtain information about the claimant’s ADLs from third parties.
- We need better, more accurate information from the claimant. This could be accomplished by improving the form and by obtaining the information either by DDS or the field office.
- Collect allegations about claimant’s absences from work at the DDS level.
- It would be helpful if the DDS conducted face-to-face interviews with the claimant.
- Every state has a different form for symptoms. We need a national (universal) form for symptoms.
- Every state has a different form for medical source statements. We need a national (universal) form for medical source statements.
- We need to increase use of the Report of Contact (SSA-5002) and reduce the use of notes screen, since the notes screen is not visible to all users.
- It is critical to document every interaction with claimants.

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### Consultative Examinations (CEs) - General

- The consultative examiner should obtain third party ADLs from the friend or relative who brought the claimant to the medical appointment.
- To measure mental functional limitations, we should increase the use of ADLs rather than obtaining a consultative mental status exam in every case.
- We should reduce the need for CEs. They are not productive, do not provide helpful information, and are expensive. There is poor quality control.
- When there is minimal medical evidence in file, we often end up with mental consultative examination (CE) which varies in quality significantly.
  - Each office handles things their own way.
  - We need some degree of quality control in CEs.
  - We need more uniformity between offices (states).
  - At some level, contracting needs to be regulated.
  - The procedures used for mental status examinations vary widely.
- We need a way to avoid mental status CEs when the claimant has mental limitations due to a physical impairment.
- We need more descriptive information from the doctor on examination. The information the doctor provides can be inconsistent with the information the claimant provided on the ADL form, yet the doctor doesn't always resolve this inconsistency. We also need better information pertaining to claimant's previous functional ability, such as a timeline.

### Residual Functional Capacity Assessment - General

- The RFC form and the MRFC form should be combined into one decision form.
- We need a better MRFC form. The current form is too vague. The definition of "moderate" needs to be improved. The definitions of "mild," "marked," and "severe" need to be improved. We need to be provided with

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guidance for the way, if any, in which the definitions on the MRFC form and Psychiatric Review Technique Form relate.

- We need a better RFC form with arrows between boxes.
- Provide space on the RFC form, with some predesignated options, that adjudicators can check to show the reasons for the finding that the claimant has limitations in functional capacity. For example, include a check box that says shortness of breath, heart, etc.
- RFC needs to quantify exertional measures consistently.

### Claim Evaluation Procedures - General

- Current OccuBrowse system is liked.
- DDSs need better access to medical consultants. Face-to-face contact between medical consultants and disability examiners is helpful.
- Adjudicators need to be reminded to resolve conflicts between the information on the forms and the opinion of the medical expert.
- It would be nice to have instant access to a vocational expert.

### Policy Concerns – General

- To what extent do computer assistive devices replace work previously done?
- Define “lead worker” and differentiate this from “management” or “supervision.”
- We need more information about the ways that mental problems affect a person’s ability to work.
- We need more consistency between judgments at all levels of adjudication.
- In assessing mental RFC, how do we account for natural abilities and the previously acquired information that is needed to learn or perform the job?
- We need more training and better training.

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- We rely on information about the range of motion of the lumbar spine. We need specific guidance regarding range of motion in degrees and specifics of lumbar and cervical spine.
- Agency needs to study and understand the connection between age and onset of impairment.
- We need more information about the general effects of work on the body.
- Claimants don't always adequately describe, on the SSA-3369, the job duties of their past relevant work. How much can be assumed about what they actually did?
- We should routinely obtain work history queries to compare with the SSA-3369 that the claimant completes.