

Occupational Information Development Advisory Panel
Social Security Administration
Quarterly Meeting
June 4, 2012

Minutes

This document contains the minutes for the quarterly meeting of the Occupational Information Development Advisory Panel (the “Panel”). This discretionary Panel, established under the Federal Advisory Committee Act of 1972, as amended (hereinafter referred to as “the FACA”), will report to the Commissioner of the Social Security (“Commissioner”). The Panel will provide independent advice and recommendations on plans and activities create an occupational information system (OIS) tailored specifically for Social Security Administration’s (SSA) disability programs and adjudicative needs.

Panel Members Present:

Mary Barros-Bailey, Ph.D., Chair
John W. Creswell, Ph.D.
Robert T. Fraser, Ph.D.
Pamela L. Frugoli
Shanan Gwaltney Gibson, Ph.D.
Thomas A. Hardy, J.D.
Janine S. Holloman, MA, CRC, LPC, CBIS
H. Allan Hunt, Ph.D.
Timothy Key, MD
Deborah E. Lechner, PT, MS
Abigail T. Panter, Ph.D.
Juan I. Sanchez, Ph.D.
David J. Schretlen, Ph.D.
Andrew E. Wakshul, J.D.

Monday, June 4, 2012

10:00 a.m. EDT

Call to Order, Poll of Members

Debra Tidwell-Peters, alternate *Designated Federal Officer*

Welcome and Review of Agenda

Mary Barros-Bailey, Ph.D., *OIDAP Chair*

Chair’s Report

Mary Barros-Bailey, Ph.D., *OIDAP Chair*

Project Report

David A. Weaver, *Acting Associate Commissioner*
Office of Program Development and Research

Subcommittee Reports

- Job Analysts Subcommittee
Deborah Lechner, PT MS, *Chair*
- Sampling Subcommittee,
H. Allan Hunt, Ph.D., *Chair*
- Taxonomy/Instrumentation Subcommittee
Shanan Gwaltney Gibson, Ph.D., *Chair*
- User Needs and Relations Subcommittee
Janine Holloman, *Chair*

Administrative Business

- Review of March 2012 Quarterly Meeting Minutes
Mary Barros-Bailey, Ph.D., *OIDAP Chair*

12:00 p.m. EDT

Adjourn

Debra Tidwell-Peters, alternate *Designated Federal Officer*

Call to Order:

Debra Tidwell-Peters, alternate *Designated Federal Officer*

Ms. Tidwell-Peters called the meeting to order, took a poll of the members, and turned the meeting over to the Panel's Chair, Dr. Mary Barros-Bailey.

Welcome and Review of the Agenda:

Mary Barros-Bailey, Ph.D., *OIDAP Chair*

Dr. Barros-Bailey informed the attendees that they may locate the agenda on the Panel's website and she reviewed the agenda for the Panel meeting. During the review of the Agenda, Dr. Barros-Bailey informed the Panel that SSA was not renewing the charter that would expire July 6, 2012. She read to the Panel the written electronic notification received from David Weaver, the Acting Associate Commissioner from the Office of Program Development and Research.

Chair's Report

Mary Barros-Bailey, Ph.D., *OIDAP Chair*

Dr. Barros-Bailey stressed the need for SSA to maintain a public and transparent process and adhere to the scientific standards developed by the Agency for the project. She confirmed that SSA canceled the recently issued Request for Proposal and had also made the decision to not renew the Panel's Charter.

Project's Report:

David Weaver, *Acting Associate Commissioner*
Office of Program Development and Research

Mr. Weaver thanked Dr. Barros-Bailey for her outstanding job as the Panel's Chair. Mr. Weaver addressed the recent OIS staffing assignment changes at SSA, including Sylvia Karman's new position with the Office of Research Evaluation and Statistics as Director of the Disability Research Consortium and Susan Wilschke as the Acting Director for the Office of Vocational Resources Development. Mr. Weaver stated that SSA is now moving into the second phase of the project which will focus on data collection and acknowledged the need for SSA to work collaboratively with other partners, citing a goal of reaching formal conclusion on these partnerships during the summer. During the second phase, SSA will seek technical expertise from other federal agencies, visiting scholars as consultants, and review the technical findings of the Panel's subcommittees. Mr. Weaver assured the Panel that the data collection efforts will be documented in published technical reports.

At this point in the meeting, Mr. Weaver received questions from the Panel on his presentation. In response to Mr. Hardy's inquiry with respect to the kind of taxonomical structure SSA will use, Mr. Weaver stated that SSA continues to discuss the taxonomic structure and the structure for aggregation of occupations and jobs that it will ultimately use for the collection of occupational data. He also stated that some of the measures in O*NET are difficult to operationalize and, as a result, SSA will have to collect additional data to supplement other information.

Mr. Hardy's final question related to the creation of a structure for the aggregation of occupations and Jobs. Mr. Weaver indicated that the agency is still working on this, but the O*NET structure is a good starting point.

In response to questions raised by Dr. Gibson regarding continued transparency with the public, Mr. Weaver responded that SSA is open to suggestions, and continuing to think about this, but a primary source will be through the publication of technical reports.

Dr. Schretlen queried Mr. Weaver on his statement that the current phase, with a focus on O*NET, is a continuation of earlier work to develop an OIS which acknowledged a lack of feasibility in its use for disability adjudication. Mr. Weaver stated that much of the work done to date, including the illumination the O*NET's strengths and weaknesses, has laid a foundation for discussions and the groundwork for what is coming next. Dr. Barros-Bailey followed up with a question regarding the needs of SSA and whether those needs have changed since the inception of the project. Mr. Weaver indicated that the discussion of O*NET has always included the possibility that there are things which could be supplemented that would make O*NET suitable as a possible tool. Dr. Barros-Bailey continued by stating the Panel's conclusion was that the current structure of the O*NET would require changes in a variety of different ways to develop the OIS, in order to result in the kind of data SSA needs to collect to meet the disability adjudication needs. Mr. Weaver agreed and included that he did not think O*NET as it currently stands, could be used in our disability process and we may need to gather supplemental data.

Ms. Frugoli clarified the existence of two taxonomies in O*NET and stated that it is based on the standard occupational classification system. Mr. Weaver concurred saying it was part of the federal SOC system and that descriptors are what would be different for SSA's disability adjudication purposes.

Dr. Gibson also agreed with the statement of the O*NET two taxonomies and connection to the SOC and inquired where the workings are in regards to developing the internal descriptor taxonomy required in order to move the project forward. Mr. Weaver responded by saying that SSA is initially interested in descriptors used to administer our disability programs, but also in addressing some of the true deficiencies of the DOT.

Mr. Weaver, in response to question regarding timeline, stated that over the next year he anticipated the formalization of some arrangements to begin testing our ability to collect data and our needs next year will be focused on data collected for potential use in our programs.

Ms. Lechner asked about the possibility of using field job analysts or is there a leaning totally toward some sort of interview process. At this time, Mr. Weaver was not able to definitively answer this question.

When asked about the projects continued adherence to scientific and legal standards, Mr. Weaver indicated that we would follow the standards that are required of federal agencies and that were generally outlined in our paper on the topic.

Dr. Barros-Bailey asked the final question regarding the development of SSA's own content, taxonomy and instrumentation and the impact in terms of usability. Mr. Weaver indicated we would certainly have to develop some mechanisms to collect the data since no other federal agency collects the type of data that we need for the disability program. Mr. Weaver also stated that while we are still considering all of the implications, we anticipate having an electronic tool

that is easy to use and he thought it would be the case that there would be a usability analysis and evaluation to as integrate data in program operations.

Before moving on to Subcommittee Chair Reports, Dr. Barros-Bailey urged SSA to disseminate as much information as quickly as possible as soon as it becomes available so that emerging solutions are known and understood and that SSA has sufficiently early indicators regarding usability and potential detriments to the disability program from the integration of new data. She also reviewed the FACA process followed by the Panel in making recommendations to the agency, with modification to allow for an abbreviated Federal Register public comment period.

Subcommittee Chair Reports

Field Job Analysts

Deborah Lechner, PT, MS – *Chair*

Ms. Lechner noted she had received feedback from the subcommittee members (Gibson, Hardy, Key and Fraser) and reported several overriding sentiments from the group. The subcommittee agreed that regardless of the entity performing the job analysis process, there should be a component of interview, combined with observation and physical measure (particularly in the area of physical demands of work). They also stated that analysts should receive training and certification and be required to meet minimum qualifications to perform this work. The subcommittee members indicated data should be archived in an electronic database and there should be a standardized method as well as a method for combining information from multiple jobs into a single occupation (with some systematic way of combining that information) and finally, that there should be some sort of ongoing quality review.

Sampling Subcommittee

H. Allan Hunt, Ph.D., *Chair*

Dr. Hunt identified the following points resulting from discussions with the Sampling Subcommittee: 1) SSA must meet, simultaneously, four essential requirements—legally defensible, scientifically respectable, practical and affordable; 2) the OIS must be linkable to the other national occupational employment databases through the structure of the SOC; 3) the OIS sampling strategy must provide representation of all jobs in the economy; 4) the sampling frame must adequately represents all sectors of the economy, particularly emerging sectors and new job creation; 5) it must be geographically diverse; 6) the design of the sampling strategy is more important than the actual sampling size; 7) Occupational Medical/Vocational Study offers valuable insight; and, 8) the sampling strategy must correspond with the data collection strategy. Dr. Hunt suggested that perhaps only number 8 would rise to the level of a formal recommendation to the Panel.

Taxonomy and Instrumentation Subcommittee

Shanan Gwaltney-Gibson, Ph.D., *Chair*

Dr. Gibson read the report of the subcommittee into the record (see Appendix A). Based on the assessment that the DOT has been found to be outdated, content deficient (as related to the world of work and disability adjudication), psychometrically suspect and not created specifically to meet SSA's needs, the subcommittee identified the following major points: 1) SSA must develop a taxonomic content model to comprehensively measure the world of work and attributes required for disability adjudication; 2) oversight of the process should be performed by SSA's internal team; 3) SSA should use scales that are cross job relative and psychometrically sound; 4) SSA should use multiple methods of data collection; 5) SSA should use of trained job analysts; and, 6) to ensure scientific integrity, SSA should use external review and oversight.

User Needs and Relations Subcommittee

Janine Holloman, *Chair*

Ms. Holloman reported (Appendix B) that presentations were conducted for two stakeholder groups since the last reporting period—the National Association of Disability Representatives and the Michigan Association of Rehabilitation Professionals. She relayed seven major points for Panel consideration: 1) to ensure continued transparency, the subcommittee suggests that SSA publish official quarterly project director reports; 2) continue maintenance of the project's web sites; 3) conduct regular stakeholder teleconferences (via Skype or some other means with question and answer capability), hosted by the project director and/or the lead scientist; 4) once complete, SSA should make project findings available for peer review; 5) SSA should publish any Federal Register announcements or information regarding the project on the project's websites; 6) SSA should maintain an official repository of public comments for access and review; 7) SSA should establish a formal notification procedure regarding plans for testing, implementation and data collection, including opportunities available for external experts to assist in information gathering and or processing of data findings; and 8) that SSA consider use of focus groups to assist in the review of procedures, analysis, implementation and other issues as the project moves forward.

After presentation of the subcommittee chair reports, the Panel deliberated and voted on the following draft General Recommendation #9 to SSA that reads:

~ Continued Transparency and Public Engagement ~

The OIDAP brought transparency to SSA's occupational information development process that will impact the lives of millions of Americans. We

believe SSA must continue this transparency as it develops any occupational information that will affect decision-making in the disability programs. We offer the following advice:

- 1) publicize reports from leadership of the Office of Vocational Resources Development (OVRD) on the project's activities, including continued updates regarding the progress with this initiative and strategic goals on agency websites and in public forum webinars and informational sessions, advertised in the Federal Register and agency sources;
- 2) announce all future strategic research and development plans, as well as findings from the project development and data collection efforts, to researchers for peer review;
- 3) continue to promote a venue for public comment and a repository for such comment; and,
- 4) engage and involve stakeholders and the scientific community in the review of research and development activities, as well as issues related to the analysis, usability, and integration of occupational data into the disability adjudication process.

~ *The Science* ~

The foundation upon which any occupational information database rests is its taxonomy of attributes to be measured and the scales that actually measure them. As with anything anyone builds, if the foundation is inadequate, the structure will fail. We reiterate the importance of developing a taxonomic content model that is strong enough to withstand legal challenge. We affirm our belief that:

- 1) the taxonomy must comprehensively measure the world of work and those attributes applicable to disability adjudication;
- 2) internal staff trained and experienced in the scientific design and research, and also in disability adjudication application, must work together in this process;
- 3) the scales used to measure these attributes must be absolute, cross job-relative, and psychometrically-sound;
- 4) the occupational data must link to other national occupational employment databases through the structure of the *Standard Occupational Classification*;
- 5) SSA adopts a carefully-designed sampling strategy that represents all jobs in the national economy (the Occupational Medical-

Vocational study conducted by OVRD offers a good starting place);

- 6) the sampling frame must adequately represent all geographically-diverse sectors of the economy, including emerging sectors, be periodically updated, and correspond to the data collection strategy;
- 7) data collection modes, subject matter experts, and the training and experience of those involved in data collection is a vital step in the development of data; thus, SSA should pay special attention to this phase of the project, and particularly to the qualifications and training of field job analysts, an area that presents the greatest threat to the validity of the data;
- 8) SSA should test the resulting data with users for comparability and decision-making effects; and,
- 9) SSA should periodically update the data to remain relevant and reflective of the world of work in the United States.

Failure to fully ensure the scientific veracity of the occupational taxonomy, data collection instrument, sampling strategy, and sources of data or data collection methods, will make SSA vulnerable to legitimate litigation.

Deliberation

The Panel deliberated on issues relating to the subcommittee chair reports and discussed the draft final report. Dr. Barros-Bailey reviewed the process for soliciting comments, including publication in the Federal Register, and suggested a slight amendment to the Panel's operating procedures to allow for an abbreviated public comment period. The Panel will schedule and hold a final meeting to consider any comment received from the public, deliberate on the final report and closeout any outstanding administrative business.

Adjourn

Ms. Tidwell-Peters adjourned the meeting at 12:30 p.m. EDT.

APPENDIX A – Report of the Taxonomy and Instrumentation Subcommittee

As read during the OIDAP Public Teleconference, June 4, 2012

Shanan Gwaltney-Gibson, Ph.D., Chair

The Taxonomy and Instrumentation Subcommittee has had one meeting. It was a teleconference held on May 18th. Realizing that the Occupational Information Development Advisory Panel is concluding its tenure, the most recent Taxonomy and Instrumentation Subcommittee teleconference was focused upon reviewing the OIDAP project progress and status to date and assessing how we might contribute advice and recommendations going forth. As a result of this meeting it was determined that the subcommittee would formally articulate a statement of advice to SSA as guidance toward its ongoing endeavors.

For years SSA has relied upon data from the Dictionary of Occupational Titles that is outdated, content deficient with regard to the world of work and disability adjudication, psychometrically suspect and not created specifically to meet SSA's needs. The goal of this project has always been to rectify these issues. The foundation upon which any occupational information database rests is its taxonomy of attributes to be measured and the scales that actually measure them. And just as with anything one builds, if the foundation is inadequate, the structure will fail.

Based on this assessment, the Taxonomy and Instrumentation Subcommittee wishes to reiterate the view that SSA must develop a taxonomic content model that is strong enough to withstand legal challenges. The required taxonomy must comprehensively measure the world of work and those attributes applicable to disability adjudication.

We believe it is essential that oversight of this be carried out by SSA project team members within OVRD who have spent recent years researching these various criteria and are most knowledgeable in this realm. We recommend that the scales used to measure these attributes be absolute, cross job relative, and psychometrically sound. Although time is of the essence, getting the taxonomic foundation right and pilot testing SSA's instrument are necessary to ensure both scientific legitimacy and legal defensibility. SSA will not achieve criterion validation of data without both content and construct validity.

The Taxonomy and Instrumentation Subcommittee further advises that SSA use multiple methods of data collection, including not only questionnaires and interviews but also direct observation in order ensure the validity and legal defensibility of the occupational information system that is produced.

Similarly, the sources of data must be contemplated by SSA regardless of who is consulted; incumbents, supervisors, job analysts, direct knowledge of the work, motivation to collect accurate data, and training with the measurement instrument are all essential. The use of trained job analysts interacting with incumbents and direct supervisors are most likely to meet SSA's needs. In order to ensure these criteria are met, SSA needs to avoid any temptation to take short cuts. That while a penny smart would ultimately be a pound foolish and could once again result in SSA being relegated to using data that are not designed and collected specifically for its needs.

External oversight, including peer review, should also be sought by SSA to ensure scientific integrity. Failure to fully contemplate the scientific veracity of the occupational taxonomy, data collection instrument, sources of data, or data collection methods will make SSA vulnerable to legitimate litigation. The Taxonomy and Instrumentation Subcommittee hopes that SSA will keep the proceeding front and center as this project moves forward. We look forward to contributing to SSA's efforts in any manner appropriate.

APPENDIX B – Report of the User Needs and Relations Subcommittee

As presented during the OIDAP Public Teleconference, June 4, 2012

Janine Holloman, MA, CRC, LPC, CBIS, *Chair*

There have been no formal meetings held during this reporting period. But there have been two presentations this reporting period for the National Association of Disability Representatives in April, and the Michigan Association of Rehabilitation Professionals earlier this month.

It has been our pleasure and privilege to serve as Panel members and to serve on the subcommittees. We have focused on the transparency of the project and ensuring that all stakeholders are given factual and consistent information as the OIS project has moved forward.

The quarterly public meetings have been instrumental in keeping all stakeholders informed of the project's activities. And the public comment period has offered the opportunity for any interested person or group to have input into the process and the decisions in the project to date. As SSA now moves forward independently, we would respectfully request that the project team implement the following directives. And we can talk about whether or not we would like these as a formal recommendations beginning with number one that the official quarterly project director's report be publicized.

Number two, it is suggested that the project website be updated minimally quarterly.

Number three, that SSA holds regular teleconferences via Skype or some other means with question and answer times made available with the meeting hosted by the project chair and/or the lead scientist.

Number four, when the research projects are completed the findings are made available, allowing for the peer review essentials for the process.

Number five, that any Federal Register announcements or publications regarding the project must be processed -- must be published on the project web site.

Number six, that SSA should maintain an official repository for public comments on the project web site and that all public comment be available for review.

Number seven, that SSA make public a formal procedure regarding their plan testing and implementation of the actual job analysis instrument, including information regarding data collection, data analysis, and any opportunities available for experts outside of SSA who assist in information gathering and/or the processing of the findings.

And finally, number eight, that SSA considers the use of focus groups to assist in the review of procedures, analysis, implementation, and other issues as the project moves forward.

Thank you.

APPENDIX C – Essential Considerations from Sampling Subcommittee

As presented during the OIDAP Public Teleconference, June 4, 2012

- 1) The OIS for disability determination at SSA must meet four essential requirements. It is essential that the OIS be legally defensible, scientifically respectable, practical, and affordable. All these requirements must be met simultaneously, but there are some tradeoffs available.
- 2) The SSA OIS must be linkable to the other national occupational employment databases (OES and ACS) through the structure of the SOC. This will significantly improve SSA's ability to demonstrate that particular jobs are available in the national economy. It requires that the occupational taxonomy developed for the OIS be defined in a way that is compatible with the SOC.
- 3) The OIS sampling strategy must provide representation of all jobs in the economy with a known probability of inclusion in the sample. Purposeful sampling will likely be required for the actual sample selection, but the relationship to the population must always be known.
- 4) The sampling frame must adequately represent all sectors of the economy, particularly including emerging sectors where new jobs are being created. This will require periodic updating of the sampling frame and a regular schedule of updating occupational information.
- 5) Geographic diversity is important to ensure that local variation in job organization and employment requirements is captured. Variations such as shift work, telecommuting, and self-employment must also be considered.
- 6) These data will not likely be used for hypothesis testing, so the design of the sampling strategy is more important than the actual sample size. This is because the representativeness of the sample will be more critical than its variance. However, the range of variation in job requirements is also an important consideration for SSA so a systematic way of representing this dimension (perhaps inter-quartile range or similar measure) must be developed and monitored to ensure representativeness.
- 7) The Occ-Med-Voc study conducted by OVRD offers valuable insight for a potential stepwise implementation of a national sampling strategy.
- 8) The sampling strategy must correspond with the data collection strategy. It is essential that these two design elements are mutually reinforcing.

Certification:

I, Leola Brooks, Designated Federal Officer for the Occupational Development Advisory Panel, hereby certify that the above minutes accurately describe the Quarterly Meeting of the Panel held telephonically on June 4, 2012.

July 11, 2012

Leola S. Brooks
Designated Federal Officer