

2011- 2012

Occupational
Information
Development
Advisory Panel
(OIDAP)

Annual and Final Report
to the Agency

[BUILDING THE FOUNDATION]

The 2011 to 2012 interval was pivotal for the development of an occupational information system (OIS) for Social Security Administration's (SSA) disability programs. Despite fiscal challenges, SSA set an excellent foundation to develop a system for the decision-making needs of those it serves. With continued support, SSA could successfully meet emerging developmental and resource challenges given the direction it set in the 2011 Research and Development Report should it choose to develop the kind of occupational data it needs for its disability programs within the criteria it set as essential for such data.

OCCUPATIONAL INFORMATION DEVELOPMENT ADVISORY PANEL

Mary Barros-Bailey, Ph.D.
Chair

5 July 2012

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The Honorable Michael J. Astrue
Commissioner
Social Security Administration
Suite 100 Altmeyer
6401 Security Boulevard
Baltimore, MD 21235

Dear Commissioner Astrue:

On behalf of the Occupational Information Development Advisory Panel (OIDAP), attached please find the Panel's final report. Because of the emerging changes to the Occupational Information System project, this report serves as both a summary for 2011-2012 as well as the OIDAP's final report to the agency.

With our initial charter in 2008, the Social Security Administration (SSA) brought together a diverse group of professionals on the OIDAP to provide the agency with advice and recommendations on a task vital to the foundation of the disability programs – the development of occupational data. The challenge was defying, daunting, inspiring. The mix between scientists and practitioners from private, public, and academic sectors proved to be initially challenging, but ultimately brilliant as we learned to successfully work together with SSA's Office of Vocational Resources Development (OVRD) in the mission to accomplish SSA's goal. Having the opportunity to work with a devoted and dedicated group of professionals on the OIDAP and OVRD was humbling.

The road SSA embarked upon in 2008 took courage and in some ways made SSA vulnerable to the admission that a foundational part of its disability programs needed fixing – urgently. Without this fix, the disability programs are in danger of not having the most essential information upon which to make individualized decisions at Steps 4 and 5 of the sequential evaluation process. The lives of millions of Americans with disabilities are affected by the use of this data every year, and the inability to have updated data applicable to disability evaluation in the future is potentially debilitating to SSA's disability programs. Adhering to its decision to develop an occupational information system specifically designed for agency use also required commitment. While the concept of occupational data may seem abstract, the concrete reality is that poor data is fiscally costly and potentially devastating to the disability programs.

Based on the criteria the agency set out, within the OIDAP's three and a half years of existence, we provided eight formal recommendations that are essential for the development of the kind of data SSA needs. We re-emphasize those recommendations and offer General Recommendation #9 in this report that was unanimously passed by the Panel. While SSA may elect to address the occupational data needs of the disability programs differently in the future, the results must still meet the criteria that SSA has articulated. Therefore, we underscore the need to maintain the process public and transparent and always within the scientific standards the agency developed for the project.

Sincerely,



Mary Barros-Bailey, Ph.D.
Chair

THE PANEL

The Panel streamlined its operations consistent with project and fiscal needs and provided consultation to help SSA build its foundation

~ the direction ~

SSA's Strategic Plan

The Social Security Administration (SSA) continued to need an occupational information system to replace the *Dictionary of Occupational Titles* (US Department of Labor, 1991) to improve disability policies, procedures, and tools, holding it as a goal for FY 2013-16 in its strategic plan, *Securing Value for America*.¹

The Charter

The OIDAP was rechartered in January 2011 to assist SSA with the development of the OIS. As the year unfolded, the Panel supported SSA in its embrace of General Recommendation #8 to develop a research and development project plan. SSA further evolved a business process that created the tracks upon which this plan could be organized and accelerated.

SSA struggled forward and built a strong foundation while concurrently keeping the wheels in motion to advance foundational activities outlined in other areas of OIDAP's General Recommendations – and to fulfill the challenge posed by Commissioner Astrue at the February 23, 2009 inaugural meeting when he called for “expertise, persistence, and creativity ... [to] replace this important part of [SSA's] process, and to do it in a way that is more thoughtful, will help [SSA] make more accurate decisions, faster decisions, and hopefully be as user friendly for [SSA's] employees and for the public to use as possible.” With its 2011 activities, SSA established the OIS's roots. With over three years of effort, SSA's 2011 activities positioned the project so that SSA could capably identify ways to collaborate with Federal and private entities, and incorporate ideas and processes that would advance the OIS development to meet its needs.

¹ <http://www.socialsecurity.gov/asp>

~ *transparency* ~

Public Outreach

Central to OIDAP's role as a Federal Advisory Committee Act (FACA) Panel, is transparency in its process. This tenet continued to hold central in 2011-2012, with: 1) opportunities for public input at face-to-face meetings and through presentations or electronic methods; 2) the invitation of Federal agencies, ranging from the US Department of Labor to the US Census Bureau, to present at meetings on their sampling and data collection programs; 3) meetings with oversight bodies such as the Government Accounting Office; and, 4) outreach to stakeholders through invitations to present to SSA disability examiners, claimant representatives, vocational experts, and others.

To date, transparency in the process of developing occupational data for SSA's disability programs has been achieved primarily through the OIDAP. SSA's decision to discontinue the OIDAP beyond its 6 July 2012 charter, presents the additional challenge of maintaining transparency with this project in the future.

Meetings and Agendas

As declared in headlines across the nation, the country's fiscal crisis affecting Federal budgets was evident and clear in 2011-2012, thus driving OIDAP to recommend changes that allowed it to continue its active role while providing cost savings to SSA. For FY 2012, OIDAP halved its face-to-face meetings to two, and engaged the benefits of technology with public teleconferences, reducing the fiscal impact of its meeting schedule while using a better-aligned subcommittee structure and SSA's new business process for more efficient use of the expertise represented on the Panel. The focus on public face-to-face meetings, agendas with content central to the need of the project, and the creation of opportunities for public input were emphasized. The OIDAP held its last public teleconference on 4 June 2012 and strongly advised SSA to maintain all development of occupational data for disability programs in a transparent and public arena, and to adhere to scientific standards and scrutiny.

~ expertise ~

Members

With a new charter in 2011 came additional OIDAP members with expertise in SSA disability adjudication and administrative law, industrial and organizational psychology, occupational information system development and maintenance, occupational medicine, and research design. With 14 members from a vast array of professional disciplines and practices around the mission of the OIS's development, the OIDAP was well positioned to continue to assist SSA in accomplishing its goals as outlined in the Panel's charter.

Reorganization

To best meet the demands of the OIS project and its research and development FY 2011 plan, the OIDAP's subcommittee structure was reorganized into four subcommittees (Field Job Analysts, Sampling, Taxonomy/Instrumentation, and User Needs and Relations). The reorganization also provided the flexibility of adding ad hoc groups to focus on temporary or heightened needs as these emerged, including a call for focused attention to issues on data collection at the March 2012 meeting.

Consultation

The OIDAP provided SSA with consultation on a variety of areas to help advance project activities. Upon Commissioner Astrue's request, the Panel provided advice in the development of a job description for the hire of a lead researcher with specialty in industrial and organizational psychology for SSA's internal unit where the OIS is being developed, the Office of Vocational Resources Development (OVRD). In the spring 2011, SSA sought consultation with Panel members for the development of its project plan. As the year advanced, consultation continued along technical aspects of the OIS's development, from design decisions to the use of job analysts, from research design to sampling, and from legal to scientific standards.

THE PROJECT

SSA integrates the Panel's recommendations into its OIS research and development (R&D) activities

- **Develop a plan and process to support OIS R&D**

In response to the Panel's recommendation, SSA published the OIS R&D Plan in July 2011.² In January 2011, SSA also implemented a business process to support R&D, which is summarized in the plan.

- **Communicate with Users, the Public & the Scientific Community**

SSA staff and Panel members routinely provided presentations to various professional stakeholder groups with interests in various related fields including but not limited to disability evaluation and determination, vocational rehabilitation, and claimant representation.

SSA created an OIS project Internet site,³ providing information about activities and continues to maintain a web presence for the Panel to disseminate information through postings on public meetings, teleconferences, and general information.

In addition to the guidance obtained from OIDAP members, SSA received input from a variety of external stakeholders, professionals, members of the public, and other Federal agencies, regarding disability evaluation and the use of occupational information.

SSA worked closely with its internal workgroup composed of representatives from stakeholder offices to ensure that the project aligned with its disability programs and operational needs.

² http://www.ssa.gov/disabilityresearch/occupational_info_systems.html

³ http://www.ssa.gov/disabilityresearch/occupational_info_systems.html

○ **Research Appropriate Measures & Scales**

SSA's FY 2011 OIS R&D plan reflects activity to develop the measures and scales to ensure that the OIS work taxonomy and work analysis instrument(s) delivers the requisite occupational data for SSA's disability adjudication use.

○ **Build Basic & Applied Research Activity into OIS Development**

SSA's FY 2011 OIS R&D plan outlines the various research activities needed to develop and pilot the components of an OIS.

The baseline activities SSA completed in FY 2011 included the investigation of international and domestic OISs, benchmarking for job analysis methods, and for recruiting, training, and certifying job analysts. Reports on the latter activities can be found at the OIS project website.

Efforts in FY 2012 and planned for FY 2013 were to complete and test the work taxonomy and work analysis instrument through investigation and piloting.

○ **Develop Internal & External Expertise**

In September 2010, SSA formally established the Office of Vocational Resources Development (OVRD). OVRD's mission is to create an OIS for SSA's disability programs. To allow for continued guidance, Commissioner Astrue renewed the Panel's Charter on January 6, 2012. SSA's OVRD staff continued to work with the internal OIS workgroup, comprised of members of stakeholder components within SSA.

In November 2011, SSA hired a Senior Research Psychologist with extensive applied industrial and organizational experience to oversee the research design and development of the OIS in OVRD. Also, OVRD contracted with industrial and organizational psychology experts to support SSA's OIS R&D activities.

○ **Classify Occupations Using a Variety of Methods**

The FY 2011 OIS R&D plan includes steps to develop a prototype title taxonomy to support OIS work taxonomy, work analysis instrument, and data collection testing and piloting based on existing national classifications. Results of the pilots would inform title taxonomy refinement.

- **Consider Specified Data Elements for SSA’s OIS**

In 2011, to help guide the development of an OIS work taxonomy and ensure that it meets SSA program needs, OVRD developed the Disability Evaluation Constructs (DEC) Inventory. The DEC identified the constructs that the agency considers by regulation and adjudicative experience in its functional and vocational assessment of disability claimants as well as those that the Panel, other experts and public commenters have recommended for SSA’s consideration. The DEC provides context and parameters for work taxonomy development to target SSA’s occupational information needs.

- **Create a New OIS for SSA that Meets Critical Technical, Legal, and Data Requirements**

SSA is committed to creating an OIS that meets its disability adjudication needs. Plainly stated, SSA is not replacing the DOT for all or the same purposes for which it was built and maintained by the US Department of Labor. The new OIS must meet minimum criteria for use in SSA’s disability programs; however, it does not need to include some of the same design, structure, or details as needed for career exploration. Also, as noted in the FY 2011 OIS R&D plan, SSA’s identification of OIS usability, legal, and scientific standards ensures that the OIS research and development activities meet applicable requirements. A brief paper outlining the OIS scientific standards is available on SSA’s OIS project website.⁴

⁴ <http://www.ssa.gov/disabilityresearch/documents/Scientific%20Standards.pdf>

THE FUTURE

~ purpose ~

At OIDAP's inaugural meeting, SSA made clear its emphatic need for updated and relevant occupational information for SSA's disability programs. During the three and a half years of the Panel's existence, this need has become more acute with the mounting demands that demographic and economic pressures put upon the disability programs given the nation's challenging and emerging realities.

Over the course of OIDAP's existence, we provided SSA with eight general recommendations as to the development of an occupational information system – any OIS or occupational data – that would serve the needs of the disability programs. The recommendations were grounded upon the three fundamental criteria SSA indicated

must exist in this data:

- 1) reflective of human function;*
- 2) representative of the national economy ; and,*
- 3) legal defensibility.*

~ impact of data ~

Although OIDAP's charter ends in July 2012, we understand that SSA's mission continues. While we have received only a glimpse of the agency's revised future plan – its intent to collaborate with Federal partners as noted in Acting Associate Commissioner David Weaver's update to the OIDAP during the June 4 public teleconference – one thing remains clear: As Commissioner Astrue remarked to us in 2009 and recently before Congress, the fact that updated occupational data is needed for SSA is a given. Indeed, this kind of data is the primary source upon which work capacity decisions were made in an estimated 2.6 million disability claims in 2011 – or nearly an estimated 9 million claims during the OIDAP's existence. This number is equivalent to the total populations of nine states plus the District of Columbia over the last three and a half years. Imagine the chaos created if all people in about 20% of the states – all with some sort of disability – filed claims for benefits and SSA found itself without a sufficient primary tool to accurately determine allowances or denials. The magnitude and importance of occupational data in SSA disability determination and adjudication becomes evident.

The data's importance is not limited to SSA. From the stakeholders engaged in the process, we understand that this data is just as desperately needed by other disability systems in government and private sectors – state and Federal workers' compensation, long term disability, torts, vocational rehabilitation, family law, pension funds, no-fault auto, life insurance, veterans affairs, and more. Further afield, during OIDAP's tenure, we received information from other countries – such as Canada and Ireland – that are considering the development of similar systems for purposes of working with and making social program decisions that affect persons with disabilities.

The message is clear: SSA must address the tasks to define and collect needed data carefully, soundly, and openly to provide fair and equitable occupational information tools that will make profound and lasting impacts on the lives of people with disabilities, their families, and society.

General Recommendation #9

At the OIDAP meeting on 4 June 2012, the Panel unanimously developed General Recommendation #9 about the transparency and scientific activities for future efforts in the development of occupational data for disability purposes. The General Recommendation went out for public comment and was ratified by the Panel on 5 July 2012.

*The OIDAP has not been consulted or involved in efforts for the future direction of occupational data development beyond the public meeting on 4 June 2012, nor apprised of any plans to modify any existing systems (e.g., O*NET) developed for other purposes, such as career counseling or workforce development. Thus, General Recommendation #9 serves to provide advice as to the development effort for any occupational data that could be meet the identified needs within disability adjudication.*

~ continued transparency ~

The OIDAP brought transparency to SSA's occupational information development process that impacts 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. While it is difficult to offer specific guidance without

sufficient knowledge of future endeavors, 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.

~ in summary ~

For years, the SSA has relied on data from the Dictionary of Occupational Titles (DOT) that is outdated, content deficient (with regard to the world of work and disability adjudication), psychometrically suspect, and created for the needs of another agency's programs (Department of Labor's programs) rather than SSA's needs. The goal of the OIS project has always been to rectify these issues given that other entities, including the OIDAP, concluded that SSA needed a suitable source because existing sources were not designed to provide a true solution for SSA's purposes and any existing source would need significant renovation.

This is a serious problem and requires a serious solution.

SSA must be in a position to define and address its occupational data needs regardless of where the occupational data are developed.

SSA needs to avoid the temptation to take shortcuts that, while possibly politically or fiscally expedient, would ultimately result in data that is not designed or collected specifically for its needs.

Further, SSA should consider external oversight, including establishing an oversight body involving technical experts and users, as part of future efforts and initiatives for occupational information development.

The OIDAP joins the various Federal and private entities that have concluded before and during its existence that SSA needs a suitable source of occupational information for its disability programs.

We appreciate having taken part in the process of helping to solve this dilemma impacting the lives of a growing percentage of Americans, and thank SSA and Commissioner Astrue for the opportunity of serving the people of the United States of America. We also thank the American public and stakeholders for your engagement in this process.

For additional information, please contact:

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