

Occupational Information Development Advisory Panel
Social Security Administration
Teleconference Meeting
July 5, 2012

Minutes

This document contains the minutes for the July 5, 2012, teleconference 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 to create an occupational information system (OIS) tailored specifically for the 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.
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.
Timothy Key, MD - Absent

Agenda for Teleconference Meeting

2:00 p.m. EDT

Call to Order

Poll of Members

Leola Brooks, *Designated Federal Officer*
Social Security Administration

Welcome and Review of Agenda

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

Public Comment – 2:15pm to 3:15pm

Cynthia Grimley, American Board of Vocational Experts
Lynne Tracy, International Association of Rehabilitation Professionals
Jeff Truthan, SkillTRAN
Rick Wickstrom, American Physical Therapy Association

Administrative Business

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

Vote on Final General Recommendation #9
Mary Barros-Bailey, Ph.D., *OIDAP Chair*

4:00 p.m. EDT

Adjourn

Leola Brooks, *Designated Federal Officer*

Call to Order

Leola Brooks, Designated Federal Officer, 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*, informed the attendees that:

- In response to her request for an update on OIS project activities, SSA informed her that there had not been much movement since the June 4th Panel meeting. SSA continues to make personnel changes related to the OIS project as staff from the Office of Vocational Resources Development (OVRD) are being moved into a different office at SSA.
- Given that Commissioner Astrue had noted, last April, that the public would be encouraged to provide input into SSA's OIS development process even if the Panel's charter was not renewed, it is important for the public to know whom to contact. On the Panel's website is an email address for OVRD (ovrd.ois@ssa.gov). Also, Acting Deputy Associate Commissioner of the Office of Program Development and Research (OPDR), Susan Wilschke, is serving as the acting director for OVRD, and her email address is susan.wilschke@ssa.gov.
- SSA informed her that the Panel's website would remain accessible for the next 60 days (i.e., through Sept. 6, 2012) following this meeting and will include transcripts and minutes for this meeting, as well as the Panel's final report.
- The purpose of today's Panel meeting is to receive public comments on General Recommendation Number Nine and conduct a vote on its ratification.

Public Comments

Dr. Barros-Bailey invited each of the public commenters, in turn, to provide their testimony:

Cynthia Grimley, American Board of Vocational Experts

Ms. Grimley stated that:

- The final Panel recommendations “were solid and valid.”
- Several private sector entities have already developed products available on the commercial market that provide updated occupational data, which could be used in a new OIS. SSA staff experienced in scientific design and research should seriously review these products.
- Research indicates that only about 1,000 jobs from the Dictionary of Occupational Titles (DOT) currently exist in the national economy. O*NET has already added and updated new technological jobs that were not in the DOT. Therefore, SSA may not need to update the nearly 13,000 job titles that are in the DOT.
- SSA should review the Office of Inspector General’s May 30, 2012 report on the availability and use of vocational experts, and consider using the sources and organizations listed in Appendix D of that report. These organizations can be very valuable in conducting OIS development and updating tasks.
- Ms. Grimley concurred with Dr. Gibson that the O*NET can’t be utilized by SSA in its current form, but said that it does contain some valuable information that SSA can draw from.

Lynn Tracy, International Association of Rehabilitation Professionals

Ms. Tracy stated that:

- IARP is concerned that, without input from the Panel, development of a new SSA OIS will be “derailed, diverted, and watered down” and will not be rigorous enough to stand up in court.
- IARP strongly concurs with the Panel’s General Recommendation Number Nine and with the Panel’s findings that existing OISs do not meet SSA’s needs.
- A scientifically and legally defensible OIS requires:
 - a taxonomy content model.
 - use of scientific and legal standards.
 - data representative of the national economy and linkable to other databases.
 - data gathered by qualified and trained field job analysts and tested with users; thousands of vocational rehabilitation professionals possess the skills to conduct such job analyses.
 - transparency and public engagement in the development process.
- IARP requests that SSA continue to be proactive in seeking input from and informing stakeholder organizations.

Jeff Truthan, SkillTRAN

Mr. Truthan stated that:

- The termination of the Panel is premature. SSA needs to continue receiving public and independent input on its OIS development.

- He supports the Panel’s General Recommendation Number Nine, which provides “the foundation for a scientific framework and a methodology that should reflect and survive legal challenge.” Failure to adhere to such standards is very likely to result in costly legal challenges.
- Regarding O*NET:
 - There “are many good aspects to O*NET.” Some of the existing O*NET data elements may be helpful to SSA, but improvements will need to be made to most of them, including the addition of “far more functional anchor points for the measurement scales.”
 - O*NET took more than 12,000 DOT occupations and collapsed them into 1,100 occupational groups. These occupational groups are in some cases comprised of hundreds of DOT occupations, which indicates that they are “grossly over-aggregated.” In response to this point, Ms. Frugoli explained that the current O*NET database is “completely collected on SOC occupations, so it no longer represents an aggregation of DOT occupations.”
 - O*NET reports data on the frequency of occupations based only on the underlying SOC code, which could lead to significant misinterpretation. Use of these data by SSA will lead to increased litigation costs and reversals at the hearings level.
 - What are SSA’s plans for addressing critical missing elements in O*NET such as the strength requirement? SSA should consider “isolating the revised strength factor to a single element, such as lifting requirements.”
- It is essential that SSA use qualified professionals to collect job analysis data directly from employer locations, when possible and appropriate. Many rehabilitation professionals are regularly in the field collecting similar types of data, and they can be quickly trained to collect data for SSA’s OIS.
- SSA should use qualified, independent contractors to assist with project management, data collection, and data aggregation. SSA’s received responses to the Request for Information it issued in the Spring, and “those parties remain interested in assisting” SSA.
- SSA’s role is not just one of disability adjudication but also involves rehabilitation. New data collected should include aptitudes and interests, which are fundamental to career exploration and identification of other occupations a person may perform.
- Data collected as part of the new OIS—or at least a summary of these data—should be in the public domain. Also, SSA should create a national databank of job analyses based on voluntary submissions from private and public entities.
- SSA should release the “pool of disability evaluation constructs” that were collected from stakeholders.

Rick Wickstrom, American Physical Therapy Association

Mr. Wickstrom stated that:

- The American Physical Therapy Association has been following SSA’s OIS efforts with great interest. It is a vital effort, and it is very “important to move it forward and to keep it relevant.” But it appears that the effort is “getting delayed again.”

- Physical therapists have “been so frustrated ... because there’s very little in the O*NET taxonomy that is useful” to them for purposes of matching workers to jobs.
- There is a need for continued transparency and public engagement, which the Panel was able to provide. And SSA will need “to continue to get input about the usability of that system from all the potential user groups.”
- There is concern over the “gross aggregation of jobs and occupations” in O*NET and the “huge differences in terms of environmental exposures and physical demand exposures” within these job categories.

Administrative Business

The Panel approved:

- General Recommendation Number Nine as published in the Federal Register.
- The minutes from the June 4, 2012 quarterly meeting.

Dr. Barros-Bailey noted that the Panel has encouraged SSA collaboration with other organizations in the development of its new OIS and has emphasized the need for SSA to clearly articulate its needs. To enable another federal agency to successfully provide OIS data to SSA, personnel within SSA will need to coordinate with those federal partners concerning both scientific and user requirements. Those involved in this effort need to include “scientists and users, not just negotiators or management.” And the federal partners will need “to ask tough questions” as part of the OIS development process because they “will also be interpreted by the legal community as sharing in the liability of that data.”

Dr. Barros-Bailey acknowledged and thanked each current and former member of the Panel for their service and also thanked SSA staff for the assistance and support they provided to the Panel.

Adjourn

Ms. Brooks adjourned the meeting at 3:00 p.m. EDT.

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 on July 5, 2012.

Leola Brooks

August 21, 2012

Designated Federal Officer