

National Academies  
Division of Behavioral and Social  
Sciences and Education  
Committee on National Statistics  
Panel to Review the O\*NET  
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**Office of Program Development and Research**

# Excerpt of the Law: Definition of Disability

From Section 223(d)(2) of the Social Security Act

An individual shall be determined to be under a disability only if his physical or mental impairment or impairments are of such severity that he is not only unable to do his previous work but cannot, considering his age, education, and work experience, engage in any other kind of substantial gainful work which exists in the national economy, regardless of whether such work exists in the immediate area in which he lives, or whether a specific job vacancy exists for him, or whether he would be hired if he applied for work. For purposes of the preceding sentence (with respect to any individual), "work which exists in the national economy" means work which exists in significant numbers either in the region where such individual lives or in several regions of the country.

# DEFINITION OF DISABILITY: What Compels SSA to use DOT

We must consider whether because of a severe medical impairment, the individual

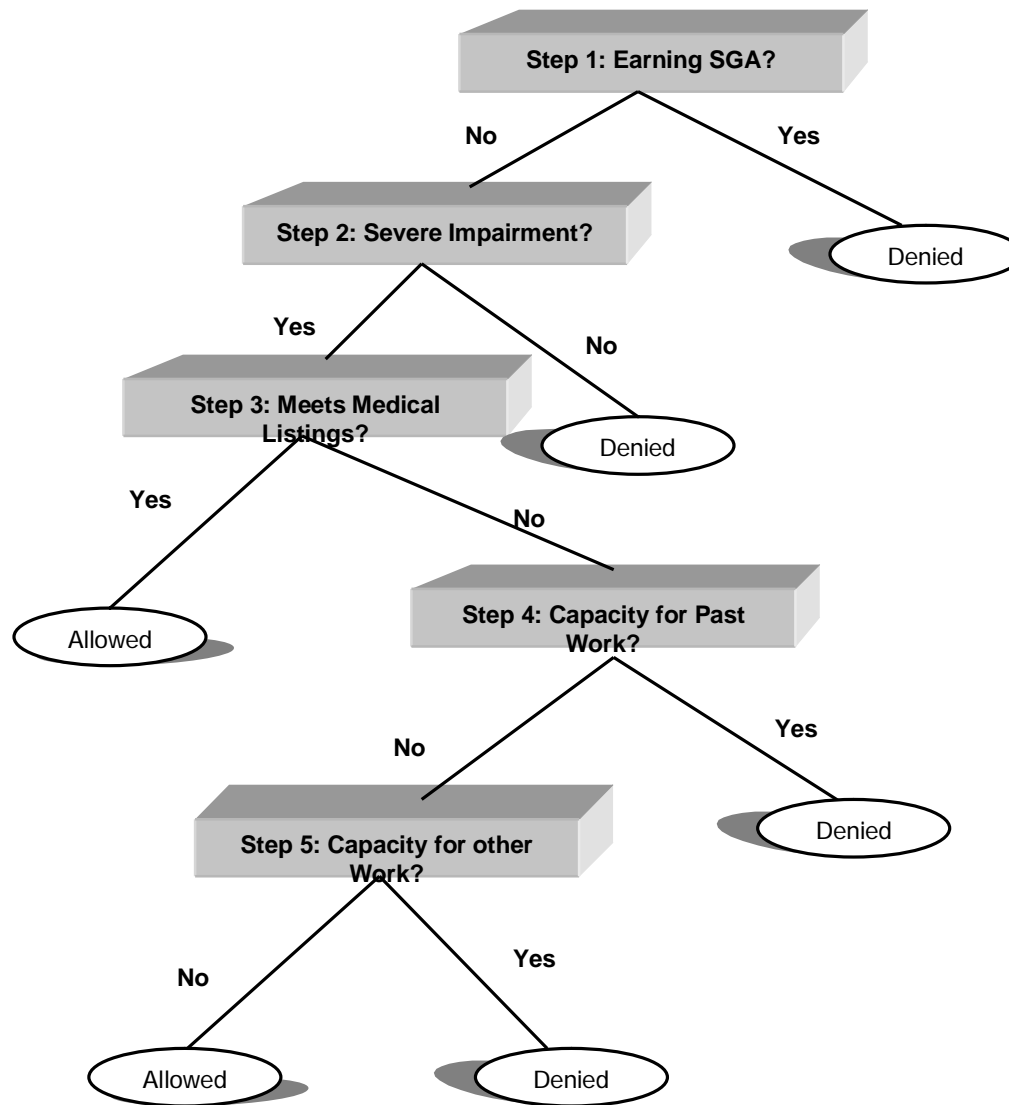
**n is not only unable to do his previous work,**

**n but cannot, considering his age, education, and work experience, engage in any other kind of substantial gainful activity which exists in the national economy,**

And if the person can do other work, does it exist in “significant numbers” in national economy?

We must meet legal “burden of proof” that a person can do other work--we take administrative notice of DOT to do this

# 5 Step Sequential Evaluation Process for Disability Adjudication



# How DOT is Integrated into SSA's Disability Process

- n Medical-Vocational Guidelines (grid rules), published 1978, based on DOT definitions.**
- n Administrative notice of reliable occupational information, including DOT**
- n Physical RFC based on DOT measures for physical job demands**

# DOT: The Bridge Between Residual Functional Capacity and Demands of Work



- n **Two sides of one equation:**  
**Person's Function <<----->> Worker Traits & Demands of Work**
- n **Residual Functional Capacity (RFC):** What an individual can do despite his/her impairments.
- n **DOT:** Bridge that allows SSA to compare an individual's RFC with the demands of work in the national economy.

## Step 4: Can Person Do Past Work?

- n Can the person do his/her past relevant work as he/she describes it?**
- n If not, can the person do past work as it is generally performed in the US economy?**
- n Use DOT to locate the person's past work as generally performed.**

## Step 5: Can Person Do Any Other Work?

- n **We consider**
  - RFC
  - Age
  - Education
  - Work Experience (Use DOT)
- n **Can he/she do other work--consult DOT and grids**
- n **Cite examples of other work person can do using DOT**

Grid: Portion of Sedentary Table  
**TABLE NO. 1 - Residual functional capacity: Maximum sustained work capability limited to sedentary work as a result of severe medically determinable impairment(s)**

<b>Rule</b>	<b>Age</b>	<b>Education</b>	<b>Previous work experience</b>	<b>Decision</b>
<b>201.01</b>	<b>Advanced age</b>	<b>Limited or less</b>	<b>Unskilled or none</b>	<b>Disabled.</b>
<b>201.02</b>	<b>Advanced age</b>	<b>Limited or less</b>	<b>Skilled or semiskilled - skills not transferable</b>	<b>Disabled.</b>
<b>201.03</b>	<b>Advanced age</b>	<b>Limited or less</b>	<b>Skilled or semiskilled - skills transferable</b>	<b>Not disabled.</b>

# Other Entities' Recommendations

**Number of entities cite that both SSA and DOL acknowledge O\*NET cannot be used in SSA's process and/or recommend that SSA investigate other alternatives.**

- n GAO Testimony: *SSA Disability Programs Fully Updating Disability Criteria Has Implications for Program Design* (July 11, 2002, pp. 10-11)  
<http://www.gao.gov/new.items/d02919t.pdf>**
- n GAO Report: *SSA and VA Disability Programs Reexamination of Disability Criteria Needed to Help Ensure Program Integrity* (August 2002, p. 27)  
<http://www.gao.gov/new.items/d02597.pdf>**
- n Social Security Advisory Board Report, *Charting the Future of Social Security's Disability Programs: The Need for Fundamental Change* (January 2001, p 14) <http://www.ssab.gov/Publications/Disability/disabilitywhitepap.pdf>**
- n IOM report--*SSA's Disability Decision Process: A Framework for Research* (January 1998, pp. 23-24)  
[http://books.nap.edu/openbook.php?record\\_id=6194&page=R7](http://books.nap.edu/openbook.php?record_id=6194&page=R7)**

# SSA Concerns with O\*NET

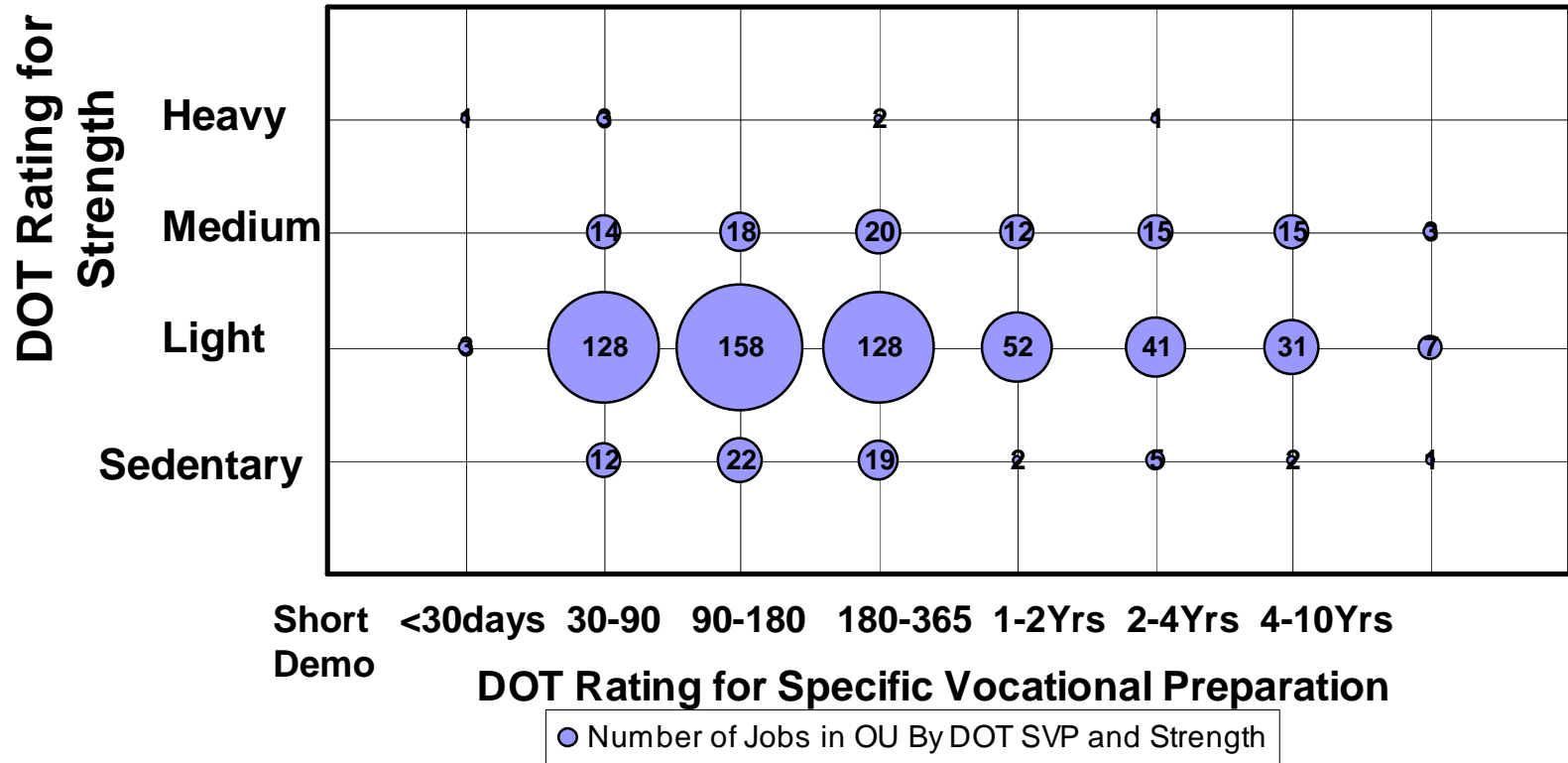
- n Aggregation: too high for disability evaluation and decision-making**
- n Descriptors: difficult to associate with medical & other evidence**
- n June and December 1999: SSA issued guidance that SSA adjudicators cannot use O\*NET**
- n Guidance still in effect today**

# O\*NET OU 51-9061: Production Inspectors, Testers, Sorters, Samplers & Weighers

DOT Job Number	DOT Job Title	DOT Strength	DOT SVP
521687086	NUT SORTER	S	2
734687094	ZIPPER TRIMMER, HAND	S	2
737687126	SHADOWGRAPH-SCALE OPERATOR	S	2
194387014	RECORD TESTER	S	4
343687010	PLASTIC-CARD GRADER, CARDROOM	S	4
715381058	HAIRSPRING TRUER	S	6
784687034	GLOVE PAIRER	L	2
922687086	RETURNED-GOODS SORTER	L	2
529387010	CHEESE GRADER	L	5
559381014	RUBBER TESTER	L	6
683360014	LOOM STARTER	L	7
806387014	WHEEL INSPECTOR	L	8
750687014	TIRE BALANCER	M	2
706381022	INSPECTOR, TYPEWRITER ASSEMBLY AND PARTS	M	6
625261010	DIESEL-ENGINE TESTER	M	7
736367010	AUTOMOTIVE-TIRE TESTER	M	7
822261018	MAINTENANCE INSPECTOR	M	8
529687046	COFFEE WEIGHER	H	1
736387014	PROOF-TECHNICIAN HELPER	H	4
739587010	INSPECTION CLERK	H	4

**Plus 763 other DOT Jobs in this OU**

## Distribution of DOT Measures for Jobs in O\*NET OU 51-9061: Production Inspectors, Testers

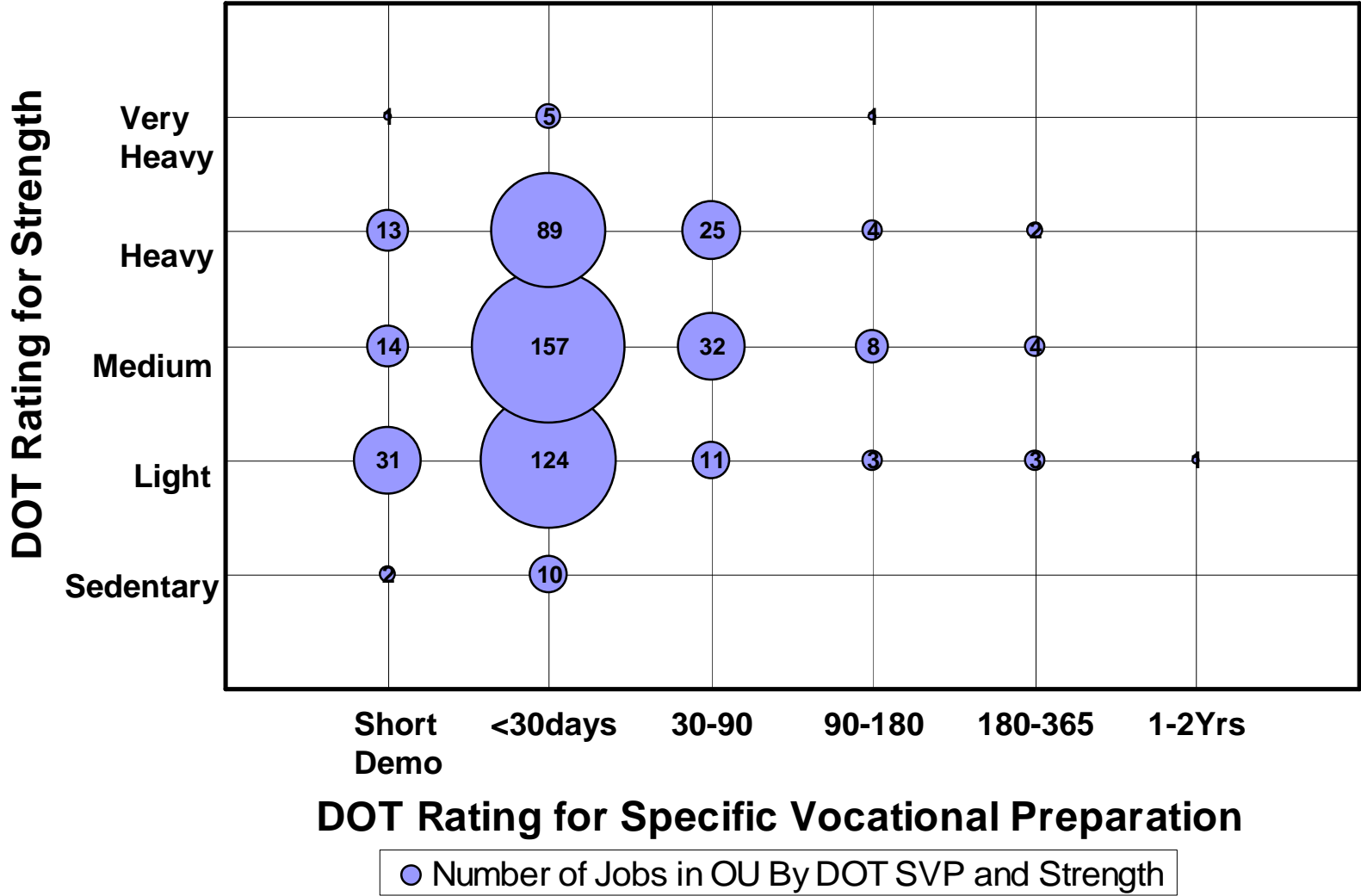


# O\*NET OU 51-9198: Production Workers

DOT Job Number	DOT Job Title	DOT Strength	DOT SVP
782687030	PULLER-THROUGH	S	1
683687018	HANDER-IN	S	2
685687014	CUFF FOLDER	S	2
770687026	JEWEL STRINGER	S	2
782687010	BASTING PULLER	L	2
788687058	HEEL DIPPER	L	2
970664010	PAINTER HELPER, SIGN	L	5
952687014	SUBSTATION-OPERATOR HELPER	L	5
922687030	CAN FILLER	M	1
969687014	ICE MAKER, SKATING RINK	M	2
979684026	PRINT-SHOP HELPER	M	3
613685014	HEATER HELPER	M	4
564687010	CHOPPER	H	1
559687050	LABORER, CHEMICAL PROCESSING	H	3
780687054	UPHOLSTERER HELPER	H	3
805664010	BOILERMAKER HELPER 2	H	5
939687018	LABORER	V	1
561686010	LABORER, WOOD-PRESERVING PLANT	V	2
911687010	BOAT-LOADER HELPER	V	2
899687010	DECORATOR, STREET AND BUILDING	V	4

**Plus 533 other DOT Jobs in this OU**

### Distribution of DOT Measures for Jobs in O\*NET OU 51- 9198: Production Workers



# Sensitivity and Specificity Issues Related to Aggregation in O\*NET

With O\*NET aggregation, critical work often cannot be located

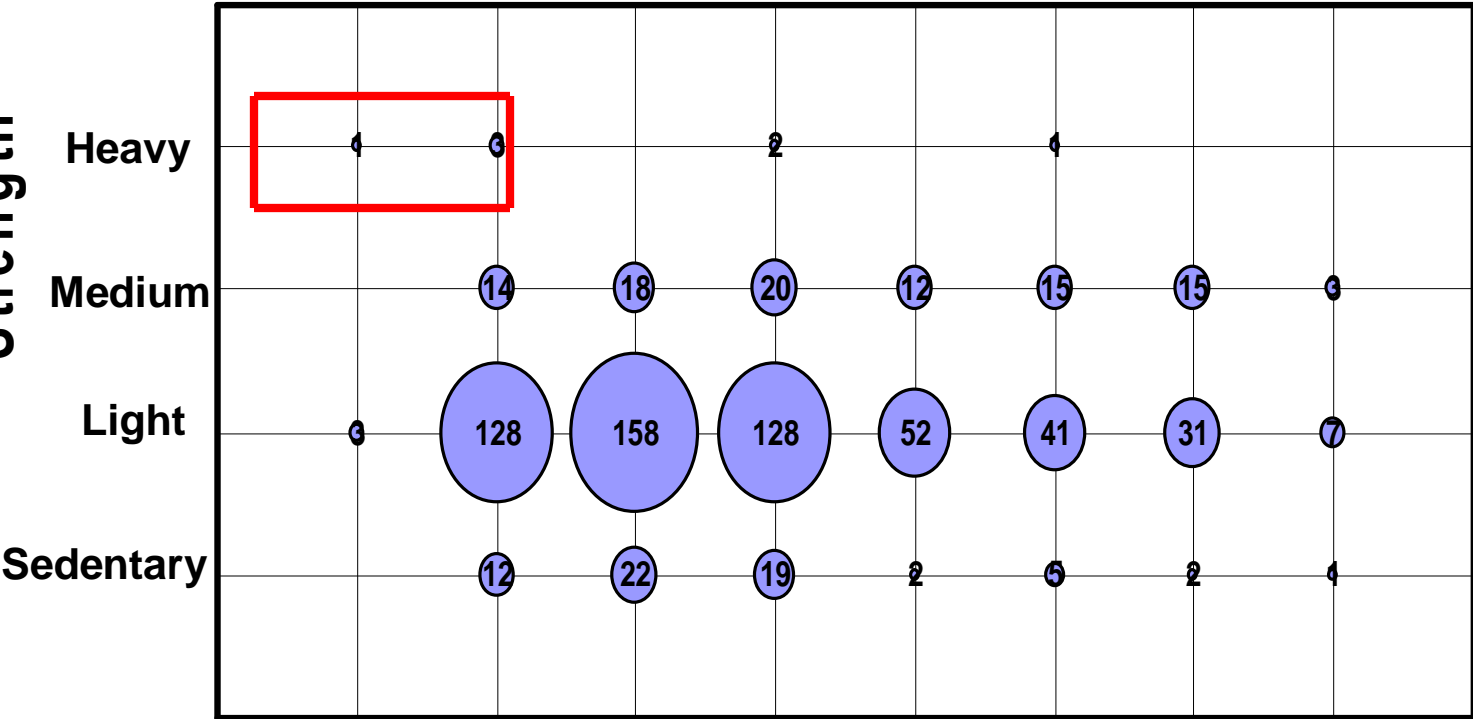
- n Sensitivity—False Negative or Type II error: Denying a case that would otherwise be allowed
- n Specificity—False Positive or Type I error: Allowing a case that would otherwise be denied

# Sensitivity--False Negative Type II Error Example

- n Claimant describes past work as “heavy,” but has “light” RFC, cannot do past work as described & cannot do it as performed--work in DOT is “heavy”
- n Related O\*NET OU reflects strength requirement as equivalent to “light” rather than “heavy”
- n Using O\*NET, claim would be denied at Step 4 & not go to Step 5.

## Distribution of DOT Measures for Jobs in O\*NET OU 51-9061: Production Inspectors, Testers

**DOT Rating for  
Strength**

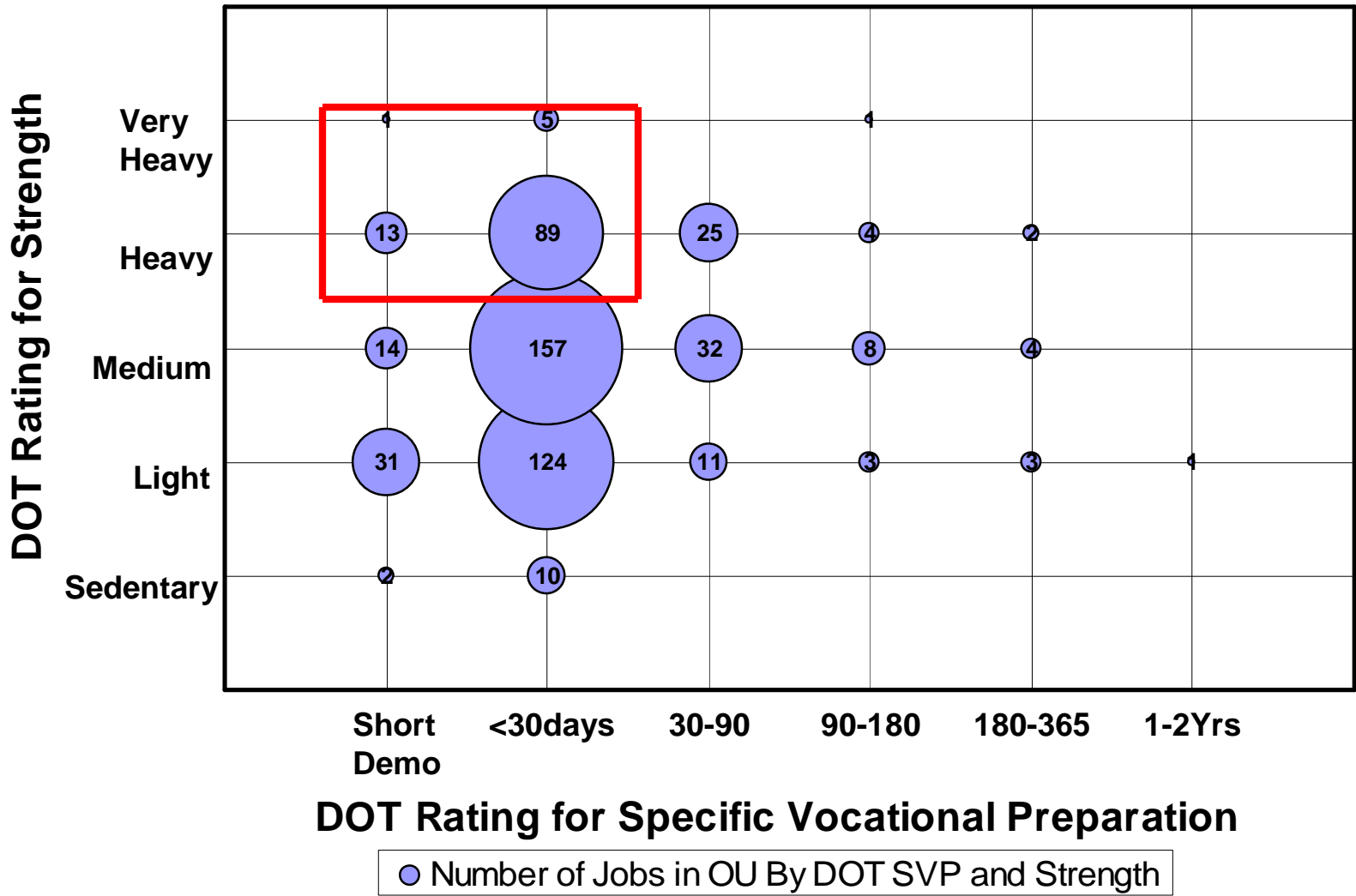


Short Demo    <30days    30-90    90-180    180-365    1-2Yrs    2-4Yrs    4-10Yrs

**DOT Rating for Specific Vocational Preparation**

● Number of Jobs in OU By DOT SVP and Strength

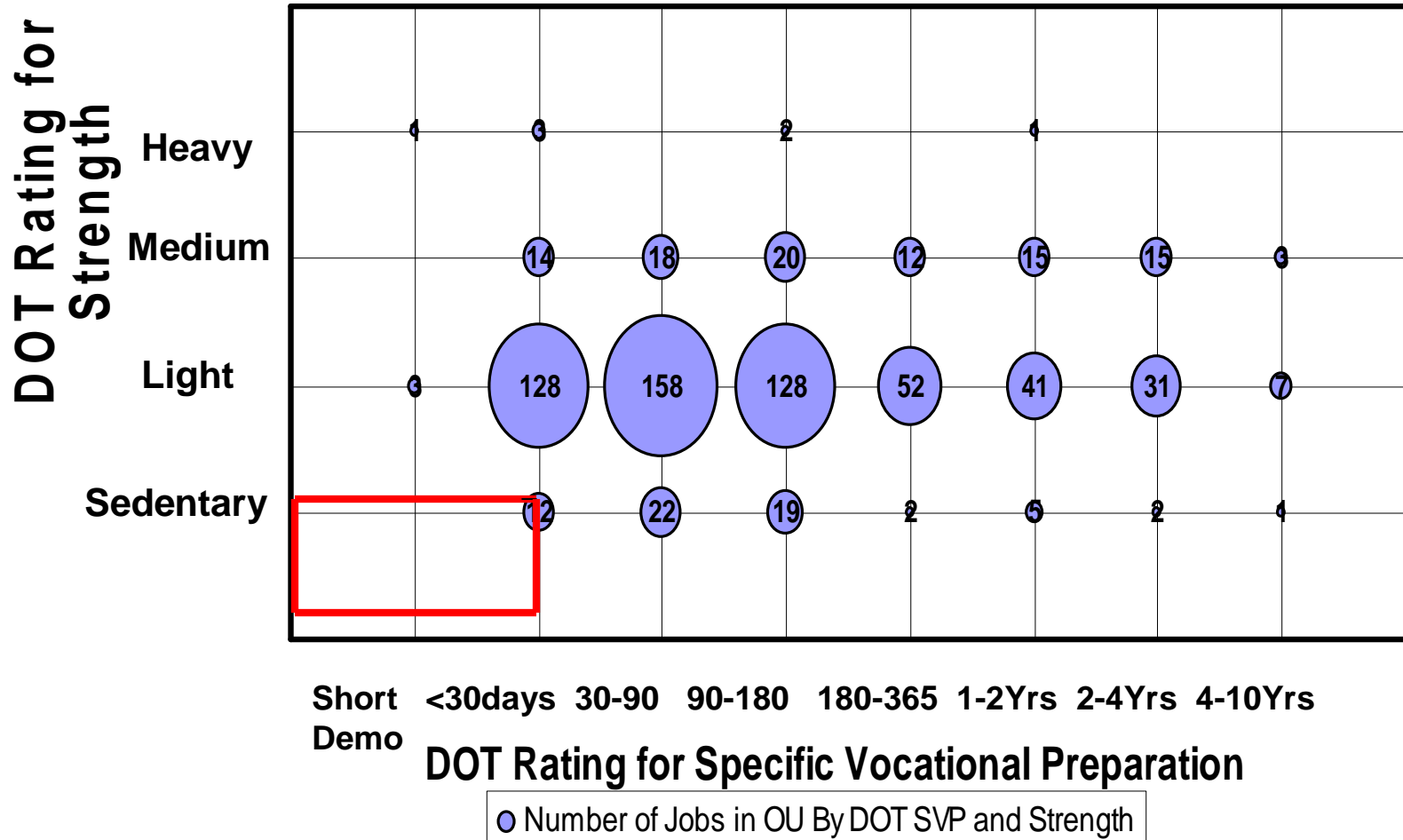
### Distribution of DOT Measures for Jobs in O\*NET OU 51-9198: Production Workers



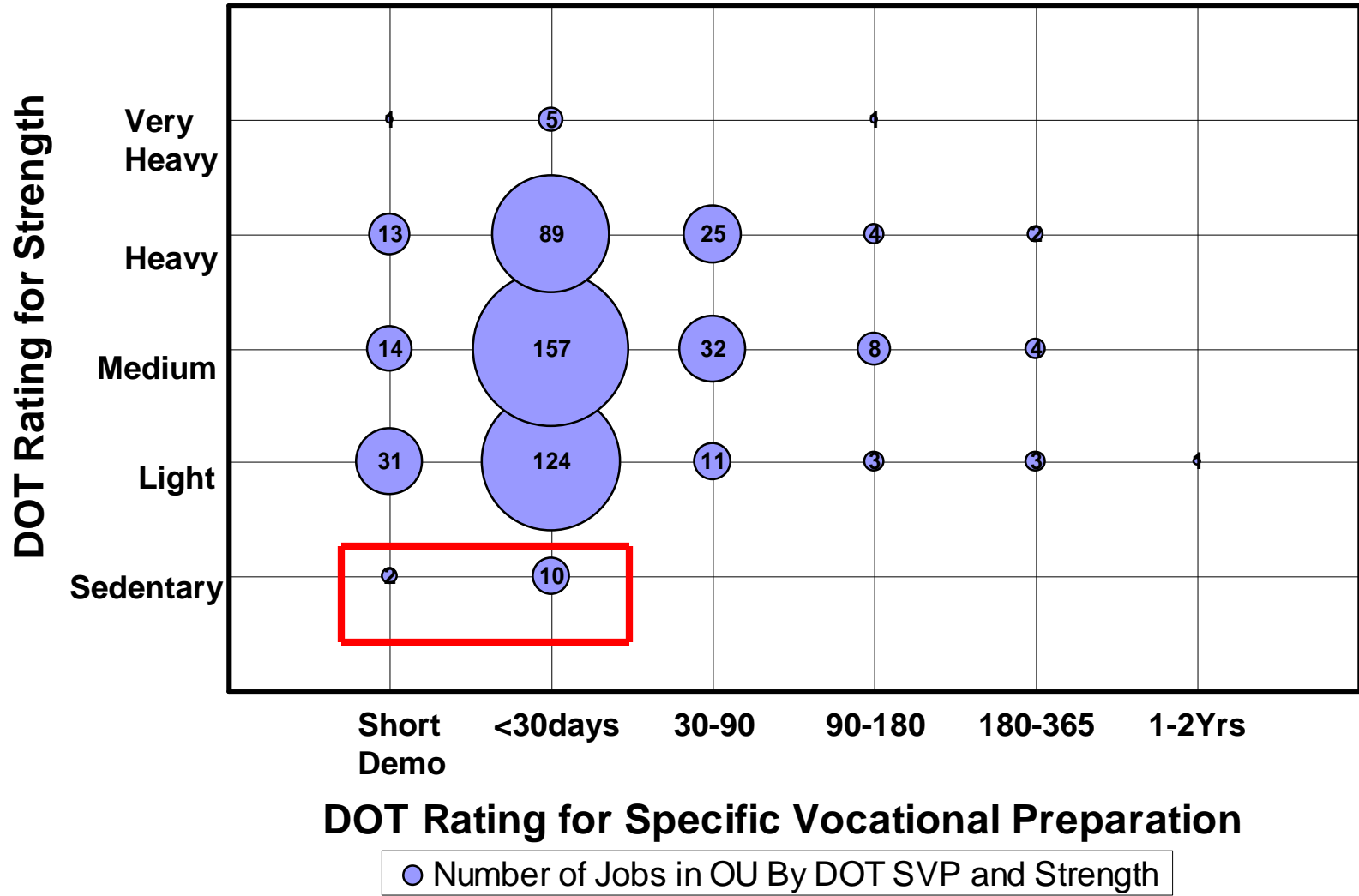
# Specificity--False Positive Type I Error Example

- n Under an O\*NET system, more “unskilled” and “sedentary” cases would be allowed
- n Due to aggregation, “sedentary” and “unskilled” occupations disappear—few, if any, can be located in O\*NET

## Distribution of DOT Measures for Jobs in O\*NET OU 51-9061: Production Inspectors, Testers



## Distribution of DOT Measures for Jobs in O\*NET OU 51-9198: Production Workers



# O\*NET Descriptors

- n Some O\*NET descriptors are difficult to interpret
- n Adjudicators and doctors may have trouble using them to determine RFC
- n May be inconsistent with medical thinking and terminology
- n Not directly observable or readily understood.

# Residual Functional Capacity Assessment

## A. EXERTIONAL LIMITATIONS

None established. (Proceed to section B.)

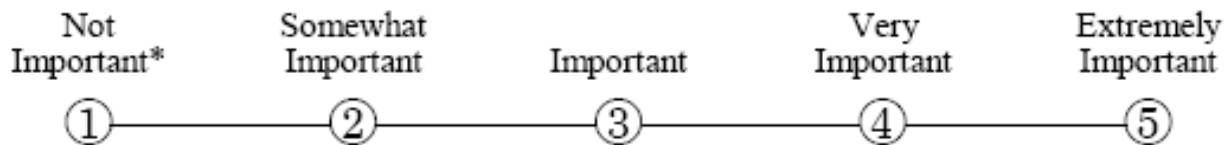
1. **Occasionally** lift and/or carry (including upward pulling) (maximum) - when less than one-third of the time or less than 10 pounds, explain the amount (time/pounds) in item 6.
  - less than 10 pounds
  - 10 pounds
  - 20 pounds
  - 50 pounds
  - 100 pounds or more
2. **Frequently** lift and/or carry (including upward pulling) (maximum) - when less than two-thirds of the time or less than 10 pounds, explain the amount (time/pounds) in item 6.
  - less than 10 pounds
  - 10 pounds
  - 25 pounds
  - 50 pounds or more
3. Stand and/or walk (with normal breaks) for a total of -
  - less than 2 hours in an 8-hour workday
  - at least 2 hours in an 8-hour workday
  - about 6 hours in an 8-hour workday
  - medically required hand-held assistive device is necessary for ambulation
4. Sit (with normal breaks) for a total of -
  - less than about 6 hours in an 8-hour workday
  - about 6 hours in an 8-hour workday
  - must periodically alternate sitting and standing to relieve pain or discomfort. (If checked, explain in 6.)
5. Push and/or pull (including operation of hand and/or foot controls) -
  - unlimited, other than as shown for lift and/or carry
  - limited in upper extremities (describe nature and degree)
  - limited in lower extremities (describe nature and degree)
6. Explain how and why the evidence supports your conclusions in item 1 through 5. Cite the specific facts upon which your conclusions are based.

**FROM THE O\*NET ABILITIES QUESTIONNAIRE: How the information is gathered from incumbents**

**32. Static Strength**

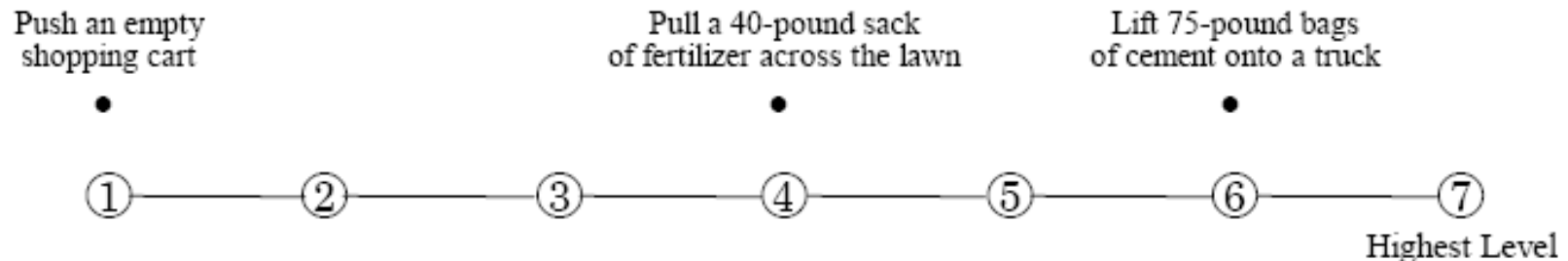
The ability to exert maximum muscle force to lift, push, pull, or carry objects.

**A. How important is STATIC STRENGTH to the performance of *your current job*?**



\* If you marked Not Important, skip LEVEL below and go on to the next ability.

**B. What level of STATIC STRENGTH is needed to perform *your current job*?**



**FROM THE O\*NET CUSTOM REPORT FOR CONSTRUCTION LABORERS 47-2061.00: How the information is presented to users**

# Translation Issues

- n Lowest anchors of some descriptors too high for disability evaluation
  - Stamina: “Walking quarter mile”
- n Some descriptors mix concepts
  - Static Strength: combines push/pull, lift/carry
- n How to translate dynamic, static, explosive, trunk strength into discrete, observable measures regarding lifting, standing, sitting, etc?

# Where are We Now?

- n Evaluate any existing updates of DOT-based information in private-sector
- n Develop new occupational information system tailored for SSA's disability programs
- n Established and working with the Occupational Information Development Advisory Panel

# Occupational Information Development Advisory Panel

- n Provide SSA with guidance for research and development
- n 12 members: Experts and Stakeholders
  - Vocational rehabilitation/experts, medical specialists, claimant representatives, physical therapist, disability insurance experts, job analysis experts

# Occupational Information Development Advisory Panel

- n Content model
- n Classification system--including linkages to SOC as mandated by OMB
- n Plans for instrument development and testing
- n Plans for data collection methods and testing
- n Plans for sampling methods and testing