

Social Security Advisory Board  
January 13, 2009

Members of the board, thank you for allowing us to talk with you about occupational information. My name is Joseph Cannelongo. By way of reference, I met Chairman Schieber while he was presenting to a human resources association in Cleveland Ohio and mentioned that I had worked with SSA on issues related to occupational information. When Kate Thornton called asking if I would meet with you, I suggested including Dr. Marilyn Silver and Mr. James Woods due to their extensive knowledge and experience in the development of O\*NET and our efforts to work with SSA. I would like for each of them to provide you with a brief explanation of their credentials once I am finished.

My experience: I am by training a Vocational Rehabilitation Counselor – certified and licensed. I am one of three owners of AdvoCare Inc. a disability management company in Ohio. We also provide vocational rehabilitation services to injured workers, insurance beneficiaries and disabled veterans. We employ staff who testify regularly in litigation as damages experts involving life care plans, the cost of care as well as vocational/employment issues. Therefore, occupational information is used extensively in every aspect of our business.

I first contacted the Department of Labor in 2000 after learning of their new occupational database, O\*NET and inquired about its use with the disability community. A professional association (IARP) asked me to represent them in further discussions. We also learned that SSA was struggling with the same concerns. We facilitated a joint meeting that included DOL, SSA and IARP representatives. The response was very positive, we found a lot of common ground and agreed to work together.

We expanded the professional representation creating the Inter-organizational O\*NET Task Force (IOTF) This group included sixteen different associations for physicians, psychologists, therapists, counselors, insurers and educators. These associations represented over 300,000 professionals. We were please to see that the consensus, among the membership was strong on our strategy.

We proposed a collaborative plan with SSA and DOL that included O\*NET with modifications that we called O\*NET –D (for Disability). The plan called for several modifications that are described in the attachment. DOL sponsored a pilot study to test our proposed job demands and the concept of using field Job Analysts to gather data. The results were quite positive. DOL further sponsored a concept paper outlining a possible strategy on how to implement such a strategy.

SSA staff agreed and decided to formalize a proposal for moving ahead with the plan and submitted it to the Social Security administrator overseeing these efforts. The joint plan for collaboration between the DOL, SSA and the IOTF member associations was a sound and economical solution. The Social security Administration would have had an

occupational database with specifically designed elements top meet their needs for disability determinations. DOL would have had additional resources for job data. The rehabilitation professionals would have had a database of job analysis that would have help ed in the placement of persons with disabilities and the Applicants for disability benefits would have the piece of mind knowing that their determination was based on current and thourough data about jobs and the world of work.

In light of advances in technology and the current availability of electronic data, our plan may require modification and /or, it may no longer be relevant. Additionally, decisions on changes to the disability determination process must come first for Social Security to determine its direction on what occupation information it requires and how it will be used.

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IOTF Strategy  
For  
Developing Disability Appropriate  
Occupational Information.  
9/21/2004

Statements:

DOL development of O\*NET- replacing the DOT.

- a. O\*NET - SOC codes. Plus
- b. O\*NET uses fewer occupational categories than DOT.
  - i. Broader categories
  - ii. Greater variability in domains that are more critical (brittle) for disability purposes.
- c. Domain Items (physical, cognitive and emotional) are not in common language.
  - i. Not described in terms familiar to the medical community.
  - ii. Not measurable using existing clinical or diagnostic instruments.
  - iii. Cost to change would be insurmountable
  - iv. Resistance to change would cause an extended period of confusion, errors and loss of integrity of the resultant data.

Objectives:

- 1.) Reduce variability within occupations
  - a. Persons with disabilities are more brittle regarding certain domain items about work. These items must have equal importance with knowledge when differentiating occupations.
  - b. Occupations must minimize variability of these domain items to assess accurately the capacity of a disabled person to perform an occupation.
- 2.) Use familiar variables.
  - a. Medically based terms
  - b. Used in defining functional limitations
  - c. Measured by existing methods and instruments

Solution:

- 1.) Create sub-OU classification to reduce variability in Key domains
  - a. Use Working Job Titles
    - i. 100,000
    - ii. Already connected to O\*NET OUs.
    - iii. O\*NET Code connector
    - iv. Critical domain items variability reduce to zero
- 2.) Identify disability related domain items.
  - a. Subject Matter Expert Panels
  - b. Peer review by Field JAs
- 3.) Develop Data gathering system
  - a. Primary – Field Job Analysts
    - i. Rehabilitation and other professionals already perform JAs

- ii. Train to perform O\*NET JAs
- iii. Train to measure disability related domain item
- iv. Train to report job tasks
- v. Credential
  - 1. Training
  - 2. Education
  - 3. Certification
- vi. Equip to report JAs electronically
- b. Data Repository
  - i. DOL
  - ii. JA data submitted by Certified Job Analysts
  - iii. Submitted electronically
  - iv. JAs coded at the Working Title level.
  - v. Data analyzed for incorporation into O\*NET information.
  - vi. Certified JAs allowed access to all JA data.
    - 1. Details of each JA
    - 2. Frequency of JAs by Job Code
      - a. O\*NET
      - b. Working Job
    - 3. Frequency distributions by various demographic and / or disability related domain items.