

OCCUPATIONAL INFORMATION DEVELOPMENT ADVISORY PANEL

Mary Barros-Bailey, Ph.D.
Chair

June 28, 2010

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

Dear Commissioner Astrue:

On January 19, 2010, you asked the Occupational Information Development Advisory Panel (OIDAP or Panel) to review reports identified by the Social Security Administration (SSA) that may be useful to the Agency's development of an occupational information system (OIS) for disability adjudication. During our first quarterly meeting in FY 2010, SSA requested that we review the National Academy of Sciences (NAS) report, *A Database for a Changing Economy: Review of the Occupational Information Network (O*NET)*. Enclosed please find the OIDAP report of our findings and considerations for SSA that the Panel approved unanimously.

In short, the timing of the NAS and OIDAP report releases has caused some confusion in that the NAS O*NET review panel completed its recommendations five months before OIDAP finished its deliberations, although the NAS report was published after the OIDAP's. Both sets of recommendations are not in conflict but rather complement each other.

The OIDAP found areas of agreement and consistency between its detailed review of SSA's needs, the consequential purpose and design of an OIS to meet those needs, and some of NAS's assumptions regarding O*NET. Further, the NAS's conclusion echoes that of several governmental and advisory bodies over the last dozen years which have found that the O*NET's design as a general econometric database could be problematic for the disability adjudication process.

The NAS found that the O*NET is useful for the purpose for which it was created. Therefore, for the US Department of Labor (DOL) to modify the O*NET to meet SSA's data needs would require DOL to redesign the entire occupational database for a single secondary user at a significant

cost to taxpayers and, in the process, potentially forsake a primary workforce development purpose for which it was created.

Our review of the NAS report affirms the recommendations outlined in our September 30, 2009 report. In addition, the O*NET report provides insights and useful information that we have suggested as areas for SSA's consideration. Specifically, the OIDAP advises caution in advancing an aggressive research agenda for the OIS before the internal scientific expertise unit is established or risk scientific rigor in the process of the OIS's development. We further strongly support the ongoing cooperation between SSA and DOL, as well as with other government agencies, which will best serve each agency and the American public. Lastly, we raise ethical and legal concerns regarding pressures to update the *Dictionary of Occupational Titles* (DOT) or to repurpose the O*NET without revalidating the database vis-à-vis disability needs. Indeed, we considered the best of both systems in our recommendations and the changes conceptualized for either system by definition result in the development of a new system for SSA.

As you know, the OIDAP extended the public feedback period through June 30, 2010 to accommodate the use of the *Federal Register* notice to solicit comments. Although we welcome input from stakeholders and the public at any time, once the formal feedback period closes, the OIDAP will provide you with an overview of the comments received since we issued our recommendations last year.

On behalf of the members of the OIDAP, thank you for your commitment to develop an OIS specific to SSA's disability programs. As you know, the Panel voted unanimously in 2009 that a new OIS was needed to replace the DOT in these programs. From the Panel's perspective, the developing a new OIS appears to be a mandatory project for SSA. As the DOT ages, SSA may soon find itself without a defensible framework for disability adjudication. The resulting ramifications to people with disabilities and to the American society are as serious as the potential social, time, and monetary costs could be staggering.

Sincerely,

Mary Barros-Bailey

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Chair

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Enclosure

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