



Office *of the* Inspector General

SOCIAL SECURITY ADMINISTRATION

*Audit Report*

The Social Security Administration's  
Efforts to Develop its Own Source of  
Occupational Information for Use in  
its Disability Programs

*A-01-15-15035 | June 2018*

**MEMORANDUM**

**Date:** June 19, 2018

**Refer To:**

**To:** The Commissioner

**From:** Acting Inspector General

**Subject:** The Social Security Administration's Efforts to Develop its Own Source of Occupational Information for Use in its Disability Programs (A-01-15-15035)

The attached final report presents the results of the Office of Audit's review. The objective was to assess the Social Security Administration's progress in developing its own source of occupational information for use in its disability programs.

If you wish to discuss the final report, please call me or have your staff contact Rona Lawson, Assistant Inspector General for Audit, 410-965-9700.



Gale Stallworth Stone

Attachment

# The Social Security Administration's Efforts to Develop its Own Source of Occupational Information for Use in its Disability Programs

## A-01-15-15035



June 2018

Office of Audit Report Summary

### Objective

To assess the Social Security Administration's (SSA) progress in developing its own source of occupational information for use in its disability programs.

### Background

In most cases, SSA determines whether an adult is disabled based on whether his/her impairments prevent him/her from doing (a) past relevant work as he/she performed it or as is generally performed in the national economy or (b) any other work in the national economy. Therefore, SSA needs information about work in the national economy.

Since the 1960s, SSA has relied on the Department of Labor's (DoL) *Dictionary of Occupational Titles* (DOT) as its primary source of occupational information. However, DoL stopped updating the DOT in 1991.

In 1998, DoL replaced the DOT with another system. However, according to SSA, this other system did not meet the needs of SSA's disability programs. Thus, in 2008, SSA decided to develop its own source of occupational information (the Occupational Information System), and, in 2012, SSA began working with DoL's Bureau of Labor Statistics (BLS) to help do this.

### Findings

Since SSA began working with BLS, it has made progress on the project, but it has more work to do. As of March 2018, BLS had developed a collection methodology and begun collecting the first set of occupational information, which it plans to finish by the end of Fiscal Year (FY) 2018. Among other things, SSA contracted with a private company to help it build the Vocational Information Tool that will be used to house and access the Occupational Information System. SSA plans to implement the system in FY 2020.

The first set of occupational information will not include the mental/cognitive demands of work for disability adjudication or a small portion of occupations because of certain challenges with the collection methodology. However, SSA has taken steps to address these challenges.

SSA plans to update the Occupational Information System in FY 2024 with a second set of occupational information that BLS plans to begin collecting annually at the end of 2018. This set may include the mental/cognitive demands of work and more occupations. SSA also plans to continue updating the Occupational Information System about every 5 years. With current information, SSA expects it will improve the quality of its disability determinations. Therefore, it is important SSA does not experience any delays in rolling out the Occupational Information System and allocates sufficient funds each year to continue the project.

### Agency Comments

SSA will continue to expand its data collection by adding mental and cognitive survey questions and adjusting its collection methodology so that more occupations are captured beginning in September 2018. SSA's target date for implementing the Occupational Information System is FY 2020, and it will continue to work diligently to avoid delays in its implementation. SSA also agreed that it is important to allocate sufficient funds on an ongoing basis so that the information remains current and accurate.

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## ABBREVIATIONS

BLS	Bureau of Labor Statistics
C.F.R.	Code of Federal Regulations
DoL	Department of Labor
DOT	Dictionary of Occupational Titles
ETA	Employment and Training Administration
FY	Fiscal Year
GAO	Government Accountability Office
NARA	National Archives and Records Administration
NPRM	Notice of Proposed Rule Making
O*NET	Occupational Information Network
OIDAP	Occupational Information Development Advisory Panel
OIG	Office of the Inspector General
OMB	Office of Management and Budget
POMS	Program Operations Manual System
SGA	Substantial Gainful Activity
SSA	Social Security Administration
U.S.C.	United States Code

## OBJECTIVE

Our objective was to assess the Social Security Administration's (SSA) progress in developing its own source of occupational information for use in its disability programs.

## BACKGROUND

SSA provides benefits to eligible disabled individuals through the Disability Insurance and Supplemental Security Income programs under Titles II and XVI of the *Social Security Act*, respectively.<sup>1</sup> SSA considers an adult disabled if he/she cannot engage in substantial gainful activity<sup>2</sup> because of a medically determinable physical or mental impairment that can be expected to result in death or has lasted, or can be expected to last, for a continuous period of not less than 12 months.<sup>3</sup>

To determine disability in adults, SSA has a 5-step sequential evaluation process that is consistent with the *Social Security Act's* definition of disability.<sup>4</sup> SSA makes most determinations at Steps 4 and 5 and bases them on whether the individuals' impairments prevent them from doing (a) past relevant work as they described it or as is generally performed in the national economy or (b) any other work that exists in significant numbers in the national economy.<sup>5</sup> Therefore, for these types of determinations, SSA needs information about work in the national economy.<sup>6</sup> This information generally includes the presence, duration, and/or level of the following:

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<sup>1</sup> *Social Security Act*, 42 U.S.C. §§ 401 (2016) and 1381 (2016).

<sup>2</sup> 20 C.F.R. §§ 404.1572 and 416.972 (2017). Substantial gainful activity is the performance of significant physical and/or mental activities in work for pay or profit or in work of a type generally performed for pay or profit. As of 2018, employees' countable earnings indicate substantial gainful activity and self-employed individuals' countable income is substantial if the amount averages more than \$1,180 per month for non-blind individuals or \$1,970 for blind individuals. SSA, *POMS, DI-Disability Insurance*, ch. DI 105, subch. DI 10501.015, sec. B and C (October 20, 2017).

<sup>3</sup> *Social Security Act*, 42 U.S.C. §§ 423(d)(1)(A) (2016) and 1382c(a)(3)(A) (2016). SSA uses a different standard to determine disability for Supplemental Security Income claimants under age 18. 20 C.F.R. § 416.924 (2011).

<sup>4</sup> If a claimant disagrees with the initial disability determination, he/she can appeal within 60 days of the date of notice of the determination. In general, there are four levels of review: a reconsideration by an adjudicator from the disability determination services who did not make the initial determination, a hearing by an administrative law judge, a review by the Appeals Council, and a review by the Federal Courts. 20 C.F.R. §§ 404.900(a) and 416.1400(a) (2016), SSA, *POMS, DI-Disability Insurance*, ch. DI 120, subch. DI 12005.000 (February 15, 2018), DI 12010.001 (February 15, 2018), and DI 12020.000 (September 20, 2011); *SI-Supplemental Security Income*, ch. SI 040, subch. SI 04005.010, sec. A (September 9, 2011). For more information about the sequential evaluation process, see Appendix A.

<sup>5</sup> See Appendix A, Table A-1 and Table A-2 for information on how often SSA used occupational information in its disability determinations.

<sup>6</sup> This work may exist either in the region where such individual lives or in several regions of the country. *Social Security Act*, 42 U.S.C. §§ 423(d)(2)(A) (2016) and 1382c(a)(3)(B) (2016).

- physical demands;<sup>7</sup>
- mental/cognitive demands;<sup>8</sup>
- environmental conditions (such as extreme heat and cold, hazardous contaminants, and noise intensity);<sup>9</sup> and
- specific vocational preparation.<sup>10</sup>

Since the 1960s, SSA has relied on the Department of Labor’s (DoL) *Dictionary of Occupational Titles* (DOT) as its primary source of occupational information.<sup>11</sup> The DOT contains the following information on occupations: (a) physical demands, (b) time it takes to become proficient, and (c) task descriptions. Although the DOT does not contain information on the occupations’ mental/cognitive demands, SSA adjudicators may infer them based on (b) and (c) above. At the hearing level, the administrative law judges may also rely on vocational experts for information about the occupations’ mental/cognitive demands.<sup>12</sup>

In 1991, which was almost 30 years ago, DoL stopped updating the DOT. Today, the DOT includes occupations that no longer exist in significant numbers in the national economy, such as elevator operators, and excludes occupations that exist in significant numbers in the national

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<sup>7</sup> Physical demands include sitting, standing, walking, lifting, carrying, pushing, pulling, or other functions that are manipulative or postural (such as reaching, handling, stooping or crouching). 20 C.F.R. §§ 404.1545(b), 404.1522, 416.945(b), and 416.922 (2017).

<sup>8</sup> Mental/cognitive demands include understanding, carrying out, and remembering simple instructions; using judgment; responding appropriately to supervision, co-workers, and usual work situations; and dealing with changes in a routine work setting. 20 C.F.R. §§ 404.1522 (2017), 416.922 (2017), 404.1545(c) (2017), and 416.945(c) (2017).

<sup>9</sup> 20 C.F.R. §§ 404.1545(d) and 416.945(d) (2012).

<sup>10</sup> Specific vocational preparation refers to the amount of time required by a typical worker to learn the techniques, acquire the information, and develop the abilities needed for average performance in a specific work situation. Specific vocational training includes education, training, and work experience. *POMS, DI-Disability Insurance*, ch. DI 250, subch. DI 25001.001, sec. A.77 (August 31, 2017).

<sup>11</sup> DoL, *Dictionary of Occupational Titles Fourth Edition, Revised 1991*, oalj.dol.gov, (last visited January 30, 2018).

<sup>12</sup> 20 C.F.R. §§ 404.1566(e) (2017) and 416.966(e) (2017).

economy, such as Web designers.<sup>13</sup> As a result, occupational information has been the subject of lawsuits against SSA. For example, in a Federal Court case, it was pointed out that the claimant held a particular job that no longer existed in significant numbers in the national economy.<sup>14</sup>

In 1998, DoL replaced the DOT with the Occupational Information Network (O\*NET). When SSA studied this system and others like it, the Agency found these systems would require significant modification to meet the needs of its disability programs because they did not describe the physical demands of occupations in a way that related to how human function was described in medical records.

Consequently, in 2008, SSA decided to develop its own source of occupational information—the Occupational Information System. This System will include the type of occupational information in the DOT as well as other types of occupational information, such as the occupations’ mental/cognitive demands.<sup>15</sup> SSA will obtain much of the occupational information through a survey and the rest of the information from certain elements of O\*NET and other databases, including the Military Occupational Classification and Occupational Employment Statistics. Originally, senior officials from SSA’s Office of Research, Demonstration, and Employee Support oversaw the project and, later, oversaw it in collaboration with senior officials from SSA’s Office of Disability Policy.

Since SSA did not have expertise in developing its own source of occupational information, it created an internal office, workgroup, and Occupational Information Development Advisory Panel (OIDAP) to support and guide the project. The OIDAP consisted of outside experts, including an employee from DoL’s Employment and Training Administration (ETA), which sponsors O\*NET. Many of the outside experts were industrial and organizational psychologists, occupational therapists, claimant representatives, vocational experts, and physicians. Among other things, the OIDAP recommended a comprehensive list of mental/cognitive demands of

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<sup>13</sup> For example, a man with diabetes, thyroid disorders, and varicose veins applied for disability benefits. SSA determined his impairments did not meet or equal any impairments in the Listing of Impairments and assessed his residual functional capacity (the most he could still do despite his limitations). SSA then identified the demands of his past relevant work as a night watchman and assembly line worker as he described them and as described in the DOT, compared both sets of demands to his residual functional capacity, and found he could no longer do his past relevant work. Next, SSA determined he could do other work (such as toll collector) that exists in significant numbers in the national economy using information in the DOT and denied his claim. However, from 1991, when DoL last updated the DOT, through 2013, when SSA made this disability determination, the number of toll collectors declined. Therefore, it was possible that toll collectors did not exist in significant numbers in the national economy when SSA made this disability determination. It is also possible an adjudicator might cite this occupation in future determinations, when toll collectors definitely no longer exist in significant numbers in the national economy.

<sup>14</sup> *Jo Anne B. Barnhart, Commissioner of Social Security v. Pauline Thomas*, 124 S. Ct. 376 (U.S. Supreme Court 2003).

<sup>15</sup> We conducted a separate review of SSA’s plans for developing its own source of occupational information, SSA, OIG, *Job Information Used in the Social Security Administration’s Disability Claims Adjudication Process*, A-01-10-21024 (November 2010).

work for SSA's consideration.<sup>16</sup> The OIDAP also recommended the Agency develop a research and development plan, which SSA did in 2011.<sup>17</sup>

In Fiscal Years (FY) 2011 and 2012, SSA worked on activities that laid the groundwork for the project. For example, SSA conducted the Occupational and Medical-Vocational study, which involved analyzing adult disability claims determined at Steps 4 and 5 of the sequential evaluation process to identify the most commonly cited occupations, physical and mental limitations, past work, and characteristics of that work.

In 2012, the Government Accountability Office (GAO) recommended SSA (1) develop a comprehensive and reliable cost estimate and schedule for its project and (2) formally assess risks to the project's success (such as the challenge of acquiring expertise) and develop mitigating strategies. According to GAO, the OIDAP could provide some expert counsel, but most of its members lacked the scientific and technical background to guide the project.<sup>18</sup>

In response to the recommendations, SSA took steps to estimate costs and develop schedules and developed project plans to assess risks. SSA also dismantled the OIDAP and began working with DoL's Bureau of Labor Statistics (BLS) under an interagency agreement. Additionally, SSA continued consulting with ETA and, in 2014, contracted with a private company. Through these partnerships,

- BLS would help SSA collect occupational information for its Occupational Information System that will replace the DOT as the primary source of occupational information used in SSA's disability adjudication process;<sup>19</sup>
- ETA would help SSA better understand the elements of O\*NET so SSA could identify those elements that could be used in data collection and incorporated into SSA's Occupational Information System; and
- the contractor would help SSA build the Vocational Information Tool,<sup>20</sup> which will be used to house and access the Occupational Information System.<sup>21</sup>

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<sup>16</sup> SSA, *OIDAP, Content Model and Classification Recommendations for the Social Security Administration Occupational Information System*, pp. 41, 42, and C-21 to C-25 (September 2009).

<sup>17</sup> SSA, *OIDAP, Annual and Final Report to the Agency: Building the Foundation*, p. 6 (July 2012).

<sup>18</sup> GAO, *Modernizing SSA Disability Programs: Progress Made, but Key Efforts Warrant More Management Focus*, *GAO-12-420*, pp. 22 and 31 (2012).

<sup>19</sup> According to the interagency agreement, if SSA had any dispute with BLS regarding its work on the Occupational Information System project, SSA could resolve the dispute using certain processes.

<sup>20</sup> The contractor is required to send a monthly report to SSA of hours spent working on the Vocational Information Tool. If SSA determined the required work exceeded the ceiling price stated in the contract, SSA would negotiate a revised estimate with the contractor.

<sup>21</sup> For a list of SSA and its partners' activities for the Occupational Information System project by year, see Appendix D.

We interviewed senior officials and staff from SSA's Offices of Research, Demonstration and Employment Support and Disability Policy as well as BLS. Additionally, we reviewed information regarding the development of SSA's own source of occupational information. For more information on our scope and methodology, see Appendix B.

## RESULTS OF REVIEW

Since SSA began working with BLS, it has made progress on the project, but it has more work to do. As of March 2018,

- BLS had developed, tested, and refined a methodology for collecting occupational information SSA needs for its disability programs;
- BLS had collected and published the first 2 years and had begun collecting the third and final year of the initial set of occupational information, which it plans to complete by the end of FY 2018;<sup>22</sup>
- SSA had analyzed the first year of occupational information BLS collected and had begun analyzing the second year;
- SSA had determined that certain elements of O\*NET could be incorporated into SSA's Occupational Information System, such as job tasks, alternate job titles, work activities, and tools and technologies for each occupation;
- SSA and its contractor had created a prototype for the Vocational Information Tool;
- SSA had organized an internal workgroup to ensure it integrates all relevant electronic systems SSA was using for disability adjudication with the Vocational Information Tool; and
- SSA had determined it should update the occupational information every 5 years based on research a BLS contractor performed.

## Collection Methodology

In FY 2013, BLS developed a collection methodology that included a 3-year Occupational Requirements Survey, a collection protocol,<sup>23</sup> and collection procedures as well as review, estimation, and validation processes. In FYs 2014 and 2015, BLS conducted several tests on the collection of occupational information by sampling respondents from private and public organizations. After each test, BLS identified challenges with the collection, discussed them with SSA, and revised certain aspects of the methodology (including survey questions, protocol,

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<sup>22</sup> BLS used the Standard Occupational Classification system, which reflects the occupational structure of the U.S. economy, to classify the information.

<sup>23</sup> The collection protocol informed staff on how to collect the occupational information. For example, it informed staff to ask questions using a conversational approach and observe jobs whenever possible to confirm the information it collected.

and procedures) as needed. In September 2015, BLS implemented the revised methodology, knowing that some survey questions and procedures needed further revisions.

- First, the survey questions about the mental/cognitive demands of work were difficult for BLS staff to ask and did not fully capture the information SSA needed to adjudicate certain disability claims. BLS originally crafted these questions based on an SSA workgroup's recommendation about the information needed on the mental/cognitive demands of work. This workgroup, which contained disability vocational policy experts and contracted psychiatric and psychological consultants, made the recommendation by analyzing SSA's regulations and policies, a comprehensive list of mental/cognitive demands of work OIDA developed, a list of mental/cognitive elements from O\*NET, and the most commonly cited mental/cognitive limitations identified in the Occupational and Medical-Vocational study.

During the 2014 testing, BLS staff found the questions on mental/cognitive demands were wordy and awkward to ask, so staff was not sure the respondents understood them.<sup>24</sup> SSA also found the questions did not fully capture the information it needed to adjudicate disability claims with a mental/cognitive component. BLS revised the questions and tested them twice, which led to additional revisions. Since the DOT did not have information on the mental/cognitive demands of work, and it was a priority for SSA to implement a replacement for the DOT, the Agency decided to test the revised questions on mental/cognitive demands while collecting its first 2 years of occupational information. The Agency decided to include the information on the mental/cognitive demands in a later update for adjudicators to use in disability determinations. The results of this testing led BLS to revise the questions and conduct an in-house test followed by another test that took place while BLS collected the third year of occupational information. BLS plans to include these new questions in the first year of the 5-year refresh cycle of data collection.

- Second, the survey questions about the durations of certain physical demands of work were difficult for respondents to answer. During the 2014 tests, BLS found respondents had difficulty with these questions primarily because the physical demands varied from day-to-day or across employees.<sup>25</sup> To answer the questions, respondents had to provide their own ranges of hours/percent of time or select a duration category (constant, frequent, seldom, or never). During the 2015 test, BLS found respondents still had difficulty with the questions.<sup>26</sup>

Shortly after, BLS conducted a job observation test on the same jobs on which it collected information during the 2015 test and found the collected and observed information had high levels of agreement across all elements except for the durations of certain physical demands

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<sup>24</sup> DoL, BLS, *Occupational Requirements Survey Consolidated Feasibility Tests Summary Report*, p. 6 (FY 2014).

<sup>25</sup> DoL, BLS, *Occupational Requirements Survey Consolidated Feasibility Tests Summary Report*, p. 5 (FY 2014).

<sup>26</sup> DoL, BLS, *Occupational Requirements Survey Preproduction Collection Report*, p. 3 (2015).

of work. For those duration elements with lower levels of agreement, they were still within a reasonable range, according to SSA.<sup>27</sup>

In FY 2017, BLS revised its procedures for the third year of collection. According to the revised procedures, the respondents only needed to provide an estimate of the percent of the day or time of an activity and staff would select the duration category based on this information.<sup>28</sup> According to SSA, these changes were successful as respondents were more able to respond and asked fewer clarifying questions. As of March 2018, BLS was conducting another job observation test on some of the occupational information it had collected.

- Third, the sampling method did not focus on some occupations, which only accounted for about 10 percent of workers in the nation. Under the sampling method, each occupation had a chance of BLS selecting it from a source that listed virtually all organizations in the private sector as well as State and local governments. Since this method did not cover some occupations, BLS modified it for the collection of the next set of occupational information, which is scheduled to begin at the end of 2018. For that collection, BLS will sample more of the occupations the original method did not cover than those covered in the original method. In subsequent years, BLS will sample more or fewer of the occupations depending on its need for information on those occupations.

SSA has policy to address situations in which a claimant's past occupation is not in the DOT.<sup>29</sup> SSA plans to develop similar policy that addresses when a claimant's past occupation is not in the Occupational Information System.

## Changes to the Project

Since working with BLS, SSA has changed the project and extended the implementation date of the Occupational Information System from FYs 2017 to 2020. SSA originally planned to implement the Occupational Information System based on existing policy since the Agency expected the system would only change minimally to support the survey data. However, as SSA and BLS moved through testing and the first year of collection and learned more about the survey data, SSA determined larger changes to policy would be necessary to support the data. As a result, SSA decided to update policy, which is part of a separate effort known as Vocational Regulations Modernization, before it will implement the Occupational Information System. As of March 2018, SSA anticipated it would take about 2 years to update policy. SSA stated it needed this time to draft and finalize the policy updates, which it had begun. See Appendix C for more information on the process SSA has to follow to update its policy. Therefore, SSA extended the implementation date for the Occupational Information System to FY 2020.

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<sup>27</sup> DoL, BLS, *Occupational Requirements Survey Job Observation Report*, pp. 1 and 2 (November 16, 2015).

<sup>28</sup> DoL, BLS, *Occupational Requirements Survey (ORS) Collection Manual*, pp. vi and 8 (3d Edition July 2017).

<sup>29</sup> SSA, *POMS, DI-Disability Insurance*, ch. DI 250, subch. DI 25005.025, sec. A and C (April 13, 2017).

## Vocational Information Tool

SSA formed cross-component workgroups to identify requirements for the Vocational Information Tool that would meet the needs of all SSA components that will use the tool. In addition, SSA's contractor had built the prototype for the tool. The prototype included search functionality and display screens designed to meet users' needs for adjudication at Steps 4 and 5 of SSA's sequential evaluation process. The search functionality allowed users to search for occupational information by job title, job description, residual functional capacity items (such as physical limitations), and other things. The display screens varied depending on the information entered for the search. For example, if the user searched on residual functional capacity items, the display screen would compare the residual functional capacity to the requirements of a particular job.

SSA also organized an internal workgroup to integrate the Vocational Information Tool with other relevant electronic systems SSA was using for disability adjudication. Further, the tool will be able to evolve as SSA updates its policies and electronic processes.

## Updating Occupational Information

SSA decided it should update the occupational information every 5 years based on a study by Northeastern University with whom BLS had a contract. The study showed occupational information may remain current for 5 to 10 years.<sup>30</sup> Thus, SSA plans to update the Occupational Information System in FY 2024 with a new set of occupational information. SSA plans to collect this set of occupational information from the end of 2018 through FY 2023. According to SSA, the new set of occupational information may include the mental/cognitive work demands.

## Project Costs and Scheduling

Since SSA began working with BLS in FY 2012, it has spent about \$98 million on the Occupational Information System project and estimates it will spend an additional \$25 million for a total of about \$123 million before SSA adjudicators begin using the new system. The Agency also estimated it would spend \$167 million more each time BLS collects a new set of occupational information<sup>31</sup> (see Table 1).

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<sup>30</sup> Northeastern University, *Dynamics of Occupational Change: Implications for the Occupational Requirements Survey*, pp. 1, 77 (July 15, 2016).

<sup>31</sup> The costs to update the occupation information will be higher than for the initial set because they will contain the results from 5 years of interviews, while the initial set contained the results from only 3 years of interviews. SSA plans to continue updating the information on a 5-year cycle, so this will be an ongoing cost for the Agency.

**Table 1: Costs for the Occupational Information System Project  
from FYs 2012 Through 2023**

Category	FY	Actual Costs Through December 2017	Estimated Additional Costs	Total Costs
Planning and Testing	2012 - 2015	\$40,905,023	\$0	\$40,905,023
Collecting First Set of Occupational Information	2016 - 2018	\$52,861,528	\$21,406,000	\$74,267,528
Developing and Implementing the Vocational Information Tool	2015 - 2020	\$4,185,532	\$3,621,225	\$7,806,757
<b>Subtotal Costs</b>		<b>\$97,952,083</b>	<b>\$25,027,225</b>	<b>\$122,979,308</b>
Collecting Next Set of Occupational Information	2019 - 2023	\$0	\$167,000,000	\$167,000,000
<b>Total Costs</b>		<b>\$97,952,083</b>	<b>\$192,027,225</b>	<b>\$289,979,308</b>

Source: SSA

In FY 2012, GAO found that SSA’s cost estimating and scheduling of the project fell short of best practices.<sup>32</sup> In FY 2017, GAO stated that SSA had improved its cost estimating and scheduling of the project, but it still fell short of best practices. For example, SSA’s cost estimates and schedules were more comprehensive than they were originally, and SSA documented its basis for the cost estimates, which were cost experience, assumptions about inflation, and the 5-year cycle for updating the occupational information. In FY 2017, GAO also stated that SSA had taken a more feasible approach to the project by doing such things as acquiring expertise from BLS. As a result, GAO acknowledged that applying best practices for cost estimating and scheduling could be resource-intensive and may no longer be appropriate.

To ensure the Agency stays on track with the project, GAO has been obtaining quarterly status reports from SSA. During our audit, we obtained two recent status reports and requested SSA send us more status reports in the future so that we can monitor the Agency’s progress on the project. Furthermore, we contacted the contracting officer’s representatives who were overseeing the contract SSA had with a private company to develop the Vocational Information Tool, and they informed us that SSA had no issues with the contractor’s work on the project.

<sup>32</sup> GAO, *Modernizing SSA Disability Programs: Progress Made, but Key Efforts Warrant More Management Focus*, GAO-12-420, pp. 18 and 19 (2012).

## Risks to the Project

We identified risks that may occur and affect the occupational information project's success. First, SSA may not be able to implement the Occupational Information System as soon as FY 2020. SSA is coordinating this effort with another initiative to update policy related to vocational analysis. If SSA experiences any delays in updating policy, implementation of the Occupational Information System could be prolonged. If this happens, SSA would use the DOT longer than it otherwise would have, and the longer SSA uses the DOT, the more outdated it becomes.

Second, SSA estimates it will spend about \$290 million on the project from FYs 2012 through 2023, when it will finish collecting the first set of occupational information. SSA also plans to continue updating the Occupational Information System with new information BLS will collect annually. However, SSA informed us it requires sufficient annual appropriations to continue working with BLS. In an effort to ensure sufficient funding, SSA has periodically updated the Congressional oversight committees on the project's status and importance and plans to continue doing this in the future. However, if the Agency's budget is insufficient to cover all its priorities in any given year, the Agency might shift the funds from the Occupational Information System project to its other priorities in that year. If SSA cannot continually update the Occupational Information System, its information will become outdated, like some of the DOT's information.

## CONCLUSIONS

Since SSA began working with BLS, it has made progress on the project, but it has more work to do. As of March 2018, BLS had collected and published the first 2 years and had begun collecting the third and final year of the initial set of occupational information, which it plans to finish by the end of FY 2018. Among other things, SSA had worked with a private company to develop the Vocational Information Tool, which the Agency anticipates rolling out in 2020. We will obtain quarterly status reports from SSA to monitor the Agency's progress on the project.

The first set of occupational information will not include the mental/cognitive demands of work or some occupations for disability determinations because of challenges with the collection methodology. However, SSA and BLS have taken steps to address these challenges. First, BLS has revised and tested the mental/cognitive demands of work questions several times—getting closer to what the Agency needs each time. Second, BLS has revised the sampling method in an effort to ensure more occupations will be included in the sample.

SSA plans to update the Occupational Information System in FY 2024 with a new set of occupational information that BLS plans to begin collecting annually at the end of 2018. This set may include the mental/cognitive demands of work and more occupations. SSA also plans to continue updating the system every 5 years. With current occupational information, SSA expects it will improve the quality of its disability determinations. Therefore, it is important SSA does not experience any delays in rolling out the Occupational Information System and allocates the funding it needs to keep the information in the system current.

## AGENCY COMMENTS

SSA will continue to expand its data collection by adding mental and cognitive survey questions and adjusting its collection methodology so that more occupations are captured beginning in September 2018. SSA's target date for implementing the Occupational Information System is FY 2020, and it will continue to work diligently to avoid delays in its implementation. SSA also agreed that it is important to allocate sufficient funds on an ongoing basis so that the information remains current and accurate. See Appendix E.

A handwritten signature in black ink that reads "Rona Lawson". The signature is written in a cursive style with a long horizontal flourish at the end.

Rona Lawson  
Assistant Inspector General for Audit

# *APPENDICES*

## Appendix A – THE SOCIAL SECURITY ADMINISTRATION’S PROCESS FOR EVALUATING DISABILITY

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The Social Security Administration (SSA) has a 5-step sequential process for evaluating disability for adults that generally follows the definition of disability in the *Social Security Act* and regulations (Figure A–1).<sup>1</sup> An individual is considered disabled under SSA’s regulations if he/she cannot engage in substantial gainful activity (SGA)<sup>2</sup> because of a medically determinable physical or mental impairment that can be expected to result in death or has lasted, or can be expected to last, for a continuous period of not less than 12 months.<sup>3</sup>

At Step 1, SSA considers whether the claimant is still performing SGA. If the claimant is not performing SGA, the claim is sent to the disability determination services for a medical determination of disability. When the claim is initially developed, the adjudicator concurrently requests all the evidence needed for consideration at Steps 2 through 5 of the sequential evaluation process.

At Step 2, the adjudicator determines whether the claimant has a medically determinable impairment and whether such medically determinable impairment is severe.<sup>4</sup> If a claimant has a medically determinable severe impairment, the adjudicator proceeds to Step 3 of the sequential evaluation process and considers the Listing of Impairments. If the severity of the impairment meets or medically equals a specific Listing, the individual is found disabled.

If the individual’s impairment does not meet or medically equal a Listing, the adjudicator looks to Steps 4 and 5. At Step 4, the adjudicator determines whether the claimant can perform past relevant work, considering his/her residual functional capacity<sup>5</sup> and the physical and mental/cognitive demands of the work as he/she did them or as is generally performed in the national economy. If the claimant can perform past relevant work, the claim is denied. If the

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<sup>1</sup> 20 C.F.R. §§ 404.1520 and 416.920 (2012). SSA uses a different standard to evaluate disability for Supplemental Security Income claimants under age 18. 20 C.F.R. § 416.924 (2011).

<sup>2</sup> 20 C.F.R. §§ 404.1572 and 416.972 (2017). SGA is the performance of significant physical and/or mental activities in work for pay or profit or in work of a type generally performed for pay or profit. As of 2018, employees’ “countable earnings” indicate SGA and self-employed individuals’ “countable income” is “substantial” if the amount averages more than \$1,180 per month for non-blind individuals or \$1,970 for blind individuals. SSA, *POMS, DI-Disability Insurance*, ch. DI 105, subch. DI 10501.015, sec. B and C (October 20, 2017).

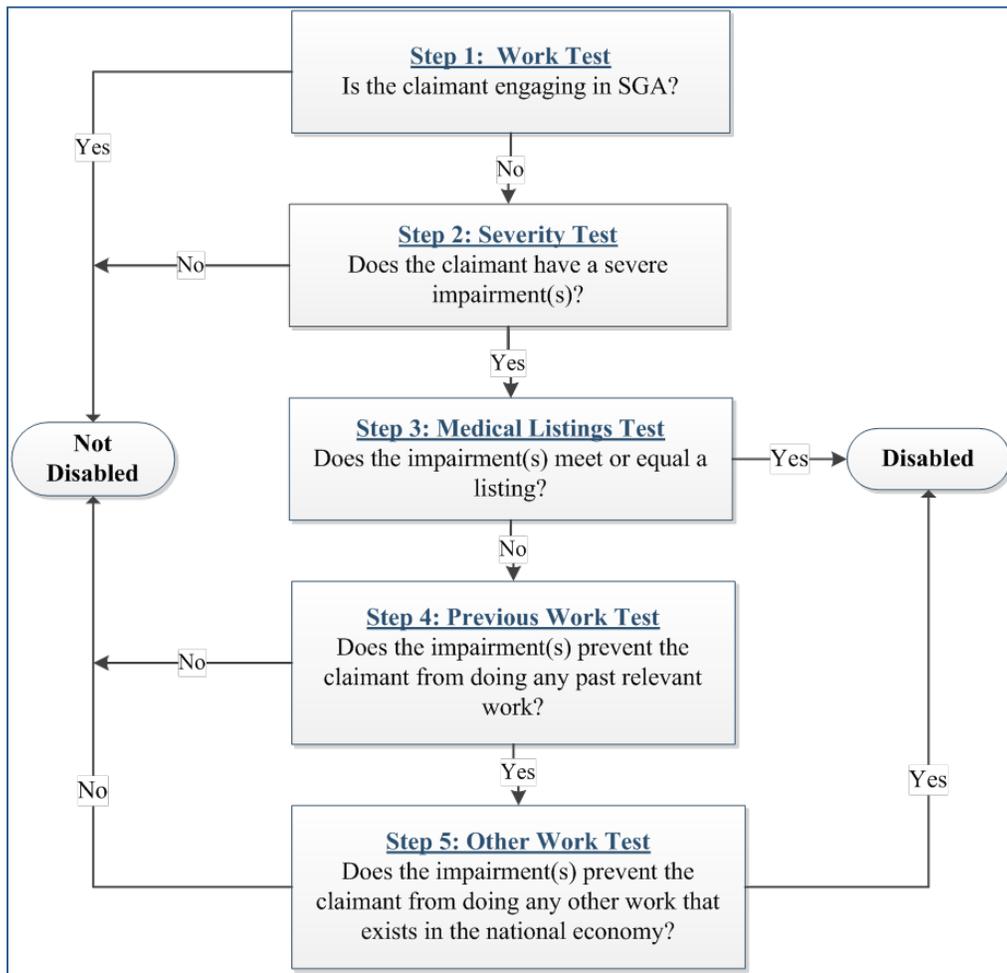
<sup>3</sup> *Social Security Act*, 42 U.S.C. §§ 423(d)(1)(A) (2016) and 1382c(a)(3)(A) (2016).

<sup>4</sup> 20 C.F.R. §§ 404.1521 and 416.921 (2017). An impairment or combination of impairments is not severe if it does not significantly limit an individual’s physical or mental ability to do basic work activities. 20 C.F.R. §§ 404.1522 and 416.922 (2017).

<sup>5</sup> 20 C.F.R. §§ 404.1545(a)(1) and 416.945(a)(1) (2012). An individual’s impairment(s), and any related symptoms, such as pain, may cause physical and mental limitations that affect what he/she can do in a work setting. The residual functional capacity is the most the individual can still do despite these limitations. SSA assesses the residual functional capacity based on all relevant evidence in the case record.

claimant cannot perform past relevant work, at Step 5, the adjudicator determines whether the claimant can perform any other work that exists in significant numbers in the national economy, considering his/her residual functional capacity, age, education, and past work experience. If the claimant cannot perform any other work, the adjudicator finds him/her disabled.<sup>6</sup>

**Figure A–1: SSA’s 5-Step Sequential Evaluation for Determining Disability for Adults**



<sup>6</sup> SSA has another sequential process for evaluating whether a disabled beneficiary’s disability continues. 20 C.F.R. §§ 404.1594(f) and 416.994(b)(5) (2017).

SSA relies on the *Dictionary of Occupational Titles* (DOT) to evaluate adult disability claims.<sup>7</sup> The Agency uses the occupational descriptions in the DOT to determine whether a claimant can do his/her past relevant work as it is usually performed in the national economy or to find other occupations he/she could do, based on his/her medical-vocational profile.

As shown in Table A–1, SSA used occupational information in over 50 percent of all initial and reconsideration disability determinations in Fiscal Years 2013 through 2017.<sup>8</sup> As shown in Table A–2, SSA used occupational information in about 80 percent of all hearing decisions in Fiscal Years 2013 through 2017.

**Table A–1: Initial and Reconsideration Determinations Fiscal Years 2013 Through 2017**

Fiscal Year	Level and Decision		Occupational Information Used	Occupational Information Not Used	Total Disability Claims
2017	Initial	Allowances	300,459 (13%)	438,701 (21%)	784,160 (34%)
		Denials	817,679 (35%)	719,053 (31%)	1,536,732 (66%)
		<b>Total</b>	<b>1,118,138 (48%)</b>	<b>1,202,754 (52%)</b>	<b>2,320,892 (100%)</b>
	Reconsideration	Allowances	43,903 (8%)	24,624 (4%)	68,527 (12%)
		Denials	338,856 (62%)	142,592 (26%)	481,448 (88%)
		<b>Total</b>	<b>382,759 (70%)</b>	<b>167,216 (30%)</b>	<b>549,975 (100%)</b>
	<b>Total</b>	Allowances	344,362 (12%)	508,325 (18%)	852,687 (30%)
		Denials	1,156,535 (40%)	861,645 (30%)	2,018,180 (70%)
		<b>Total</b>	<b>1,500,897 (52%)</b>	<b>1,369,970 (48%)</b>	<b>2,870,867 (100%)</b>

<sup>7</sup> DoL, *Dictionary of Occupational Titles Fourth Edition, Revised 1991*, oalj.dol.gov, (last visited January 30, 2018).

<sup>8</sup> If a claimant disagrees with the initial disability determination, he/she can appeal within 60 days of the date of notice of the determination. In most cases, there are four levels of review: a reconsideration by an adjudicator from the disability determination services who did not make the initial determination, a hearing by an administrative law judge, a review by the Appeals Council, and a review by the Federal Courts. 20 C.F.R. §§ 404.900(a) and 416.1400(a) (2016), SSA, *POMS, DI-Disability Insurance*, ch. DI 120, subch. DI 12005.000 (February 27, 2003), DI 12010.001 (February 15, 2018), and DI 12020.000 (September 20, 2011); *SI-Supplemental Security Income*, ch. SI 040, subch. SI 04005.010, sec. A (September 9, 2011).

Fiscal Year	Level and Decision		Occupational Information Used	Occupational Information Not Used	Total Disability Claims
2016	Initial	Allowances	340,691 (14%)	493,732 (20%)	834,423 (33%)
		Denials	908,535 (36%)	773,922 (31%)	1,682,457 (67%)
		<b>Total</b>	<b>1,249,226 (50%)</b>	<b>1,267,654 (50%)</b>	<b>2,516,880 (100%)</b>
	Reconsideration	Allowances	50,882 (8%)	26,968 (4%)	77,850 (12%)
		Denials	389,402 (62%)	158,834 (25%)	548,236 (88%)
		<b>Total</b>	<b>440,284 (70%)</b>	<b>185,802 (30%)</b>	<b>626,086 (100%)</b>
	<b>Total</b>	Allowances	391,573 (12%)	520,700 (17%)	912,273 (29%)
		Denials	1,297,937 (41%)	932,756 (30%)	2,230,693 (71%)
		<b>Total</b>	<b>1,689,510 (54%)</b>	<b>1,453,456 (46%)</b>	<b>3,142,966 (100%)</b>
2015	Initial	Allowances	361,247 (13%)	494,757 (19%)	856,004 (33%)
		Denials	956,248 (37%)	799,063 (31%)	1,755,311 (67%)
		<b>Total</b>	<b>1,317,495 (50%)</b>	<b>1,293,820 (50%)</b>	<b>2,611,315 (100%)</b>
	Reconsideration	Allowances	49,841 (7%)	26,665 (4%)	76,506 (11%)
		Denials	423,352 (63%)	172,763 (26%)	596,115 (89%)
		<b>Total</b>	<b>473,193 (70%)</b>	<b>199,428 (30%)</b>	<b>672,621 (100%)</b>
	<b>Total</b>	Allowances	411,088 (13%)	521,422 (15%)	932,510 (28%)
		Denials	1,379,600 (42%)	971,826 (30%)	2,351,426 (72%)
		<b>Total</b>	<b>1,790,688 (55%)</b>	<b>1,493,248 (45%)</b>	<b>3,283,936 (100%)</b>
2014	Initial	Allowances	389,785 (14%)	489,654 (18%)	879,439 (32%)
		Denials	1,015,866 (38%)	822,349 (30%)	1,838,215 (68%)
		<b>Total</b>	<b>1,405,651 (52%)</b>	<b>1,312,003 (48%)</b>	<b>2,717,654 (100%)</b>
	Reconsideration	Allowances	50,975 (7%)	26,883 (4%)	77,858 (11%)
		Denials	456,770 (63%)	187,859 (26%)	644,629 (89%)
		<b>Total</b>	<b>507,745 (70%)</b>	<b>214,742 (30%)</b>	<b>722,487 (100%)</b>
	<b>Total</b>	Allowances	440,760 (13%)	516,537 (15%)	957,297 (28%)
		Denials	1,472,636 (43%)	1,010,208 (29%)	2,482,844 (72%)
		<b>Total</b>	<b>1,913,396 (56%)</b>	<b>1,526,745 (44%)</b>	<b>3,440,141 (100%)</b>
2013	Initial	Allowances	418,981 (15%)	516,727 (18%)	935,708 (33%)
		Denials	1,047,704 (37%)	848,754 (30%)	1,896,458 (67%)
		<b>Total</b>	<b>1,466,685 (52%)</b>	<b>1,365,481 (48%)</b>	<b>2,832,166 (100%)</b>
	Reconsideration	Allowances	55,587 (7%)	31,221 (4%)	86,808 (11%)

Fiscal Year	Level and Decision		Occupational Information Used	Occupational Information Not Used	Total Disability Claims
		Denials	478,273 (63%)	201,848 (26%)	680,121 (89%)
		Total	533,860 (70%)	233,069 (30%)	766,929 (100%)
	<b>Total</b>	Allowances	474,568 (13%)	547,948 (15%)	1,022,516 (28%)
		Denials	1,525,977 (43%)	1,050,602 (29%)	2,576,579 (72%)
		<b>Total</b>	<b>2,000,545 (56%)</b>	<b>1,598,550 (44%)</b>	<b>3,599,095 (100%)</b>

SSA is the source of this information. We rounded some percentages so they add to 100 percent.

**Table A-2: Hearing Decisions from Fiscal Years 2013 Through 2017**

Fiscal Year	Decision	Occupational Information Used	Occupational Information Not Used	Total Disability Claims
<b>2017</b>	Allowances	237,742 (45%)	58,539 (11%)	296,281 (56%)
	Denials	186,295 (35%)	49,464 (9%)	235,759 (44%)
	<b>Total</b>	<b>424,037 (80%)</b>	<b>108,003 (20%)</b>	<b>532,040 (100%)</b>
<b>2016</b>	Allowances	215,369 (42%)	59,033 (12%)	274,402 (54%)
	Denials	187,706 (37%)	49,127 (9%)	236,833 (46%)
	<b>Total</b>	<b>403,075 (79%)</b>	<b>108,160 (21%)</b>	<b>511,235 (100%)</b>
<b>2015</b>	Allowances	218,819 (41%)	60,451 (11%)	279,270 (52%)
	Denials	204,467 (38%)	49,745 (9%)	254,212 (48%)
	<b>Total</b>	<b>423,286 (79%)</b>	<b>110,196 (21%)</b>	<b>533,482 (100%)</b>
<b>2014</b>	Allowances	224,271 (41%)	64,957 (12%)	289,228 (53%)
	Denials	206,635 (38%)	52,194 (9%)	258,829 (47%)
	<b>Total</b>	<b>430,906 (79%)</b>	<b>117,151 (21%)</b>	<b>548,057 (100%)</b>
<b>2013</b>	Allowances	282,381 (44%)	78,327 (12%)	360,708 (56%)
	Denials	229,312 (35%)	56,765 (9%)	286,077 (44%)
	<b>Total</b>	<b>511,693 (79%)</b>	<b>135,092 (21%)</b>	<b>646,785 (100%)</b>

SSA is the source of this information, and some percentages do not add to 100 percent due to rounding.

## Appendix B – SCOPE AND METHODOLOGY

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To achieve our objective, we:

- Reviewed the *Social Security Act* and the Social Security Administration’s (SSA) regulations, rules, policies, and procedures.
- Reviewed the Department of Labor’s Bureau of Labor Statistics (BLS) reports and Website regarding the Occupational Requirements Survey.<sup>1</sup>
- Reviewed SSA’s Fiscal Year (FY) 2011 Research and Development plan on SSA’s occupational information project.
- Reviewed Office of the Inspector General report, *Job Information Used in the Social Security Administration’s Disability Claims Adjudication Process, A-01-10-21024* (November 2010).
- Reviewed the following Government Accountability Office reports:
  - *Modernizing SSA Disability Programs: Progress Made, but Key Efforts Warrant More Management Focus*, GAO-12-420 (June 2012) and
  - *HIGH-RISK SERIES: Progress on Many High-Risk Areas, While Substantial Efforts Needed on Others*, GAO-17-317 (February 2017).
- Reviewed the Occupational Information Development Advisory Panel reports.
- Reviewed the following from SSA.
  - Report on the Occupational Information System Project (2015).
  - FY 2017 Congressional Justification.
  - Annual Report of the Supplemental Security Income Program (2013).
  - Annual Report of the Supplemental Security Income Program (2014).
  - SSA Component Reports from April 2013 through March 2016.
  - Statement of work for the interagency agreement between SSA and BLS that described the work to be done in FY 2018.
  - Task order associated with the contract SSA had with a private company for the Vocational Information Tool covering the period September 29, 2017 through September 28, 2018.

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<sup>1</sup> SSA and BLS developed this survey to collect the occupational information in the nation.

- Reviewed information on potential rates of change in occupational information and measures for the reliability and validity of occupational information collected through BLS' survey:
  - Northeastern University, *Dynamics of Occupational Change: Implications for the Occupational Requirements Survey*, (July 15, 2016) and
  - Northeastern University, *Methodological Issues Related to the Occupational Requirements Survey* (February 26, 2015).
- Observed a demonstration of the prototype for the Vocational Information Tool (the system that will house the occupational information BLS was collecting for SSA) to understand how it works. However, we did not assess this system or the steps taken to develop it.
- Interviewed senior officials and staff from SSA's Offices of Research, Demonstration and Employment Support and Disability Policy as well as staff from BLS.
- Obtained cost estimates from SSA for collecting occupational information and building the Vocational Information Tool but did not verify the accuracy of the cost estimates as this was not necessary to accomplish our objective.
- Obtained feedback from the contracting officer's representatives who were overseeing the contract SSA had with a private company for the Vocational Information Tool covering the period September 29, 2017 through September 28, 2018.

We conducted our review from October 2017 through March 2018 in Boston, Massachusetts. The entities reviewed were the Offices of Research, Demonstration and Employment Support; Research, Evaluation and Statistics; and Disability Policy under the Office of the Deputy Commissioner for Retirement and Disability Policy. We conducted this review in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Appendix C – UPDATING DISABILITY POLICY

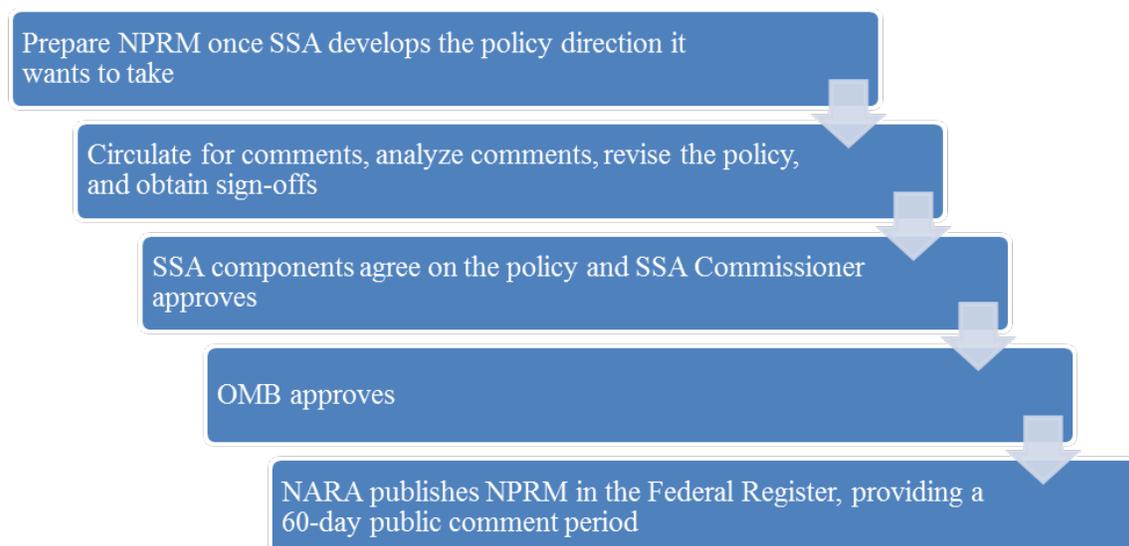
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As of March 2018, the Social Security Administration (SSA) had made progress in updating its disability policy. SSA refers to this effort as Vocational Regulations Modernization. For this effort, SSA

- conducted research on information needed for making disability determinations at Step 5 of the disability adjudication process;
- had multiple discussions with Federal agency partners, private sector disability insurers, and disability researchers regarding disability policy;
- analyzed the first year of occupational information the Bureau of Labor Statistics had collected, began to analyze the second year, and planned to analyze the third year; and
- began drafting policy changes.

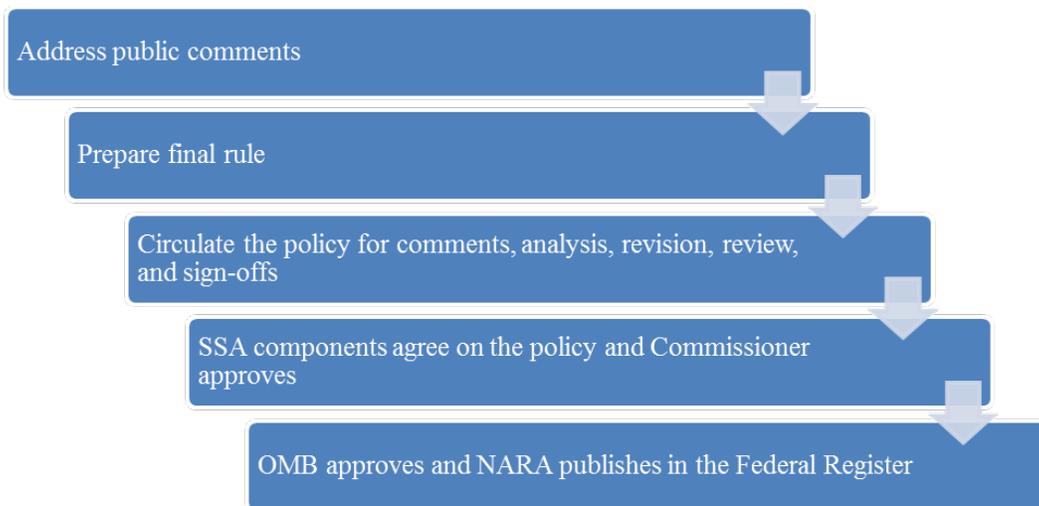
In Fiscal Year 2018, SSA began the process to draft, publish, and finalize the policy changes—which can take SSA 15 to 18 months, on average. However, this could take longer depending on the number and type of comments the Agency receives from the public, the Office of Management and Budget (OMB), and SSA. For the process, SSA must publish the updates in the Federal Register, first as a Notice of Proposed Rule Making (NPRM) and then as a Final Rule. The internal process to create the NPRM takes longer than 90 days. This includes time to work with SSA’s Office of Regulations and Reports Clearance to draft the NPRM, circulate it for comments, analyze comments, revise the NPRM, and obtain additional reviews and sign-offs. Next, SSA must obtain OMB permission to send the NPRM to it for review. The OMB review takes up to 90 days. Once any necessary changes and sign-offs are completed, the NPRM is sent to the Office of the Federal Register, National Archives and Records Administration (NARA) for publication in the Federal Register. Stakeholders have 60 days to comment on the NPRM. See Figure C–1.

**Figure C–1: NPRM Process**



After the 60-day comment period, SSA starts the process of publishing the Final Rule. First, SSA considers and addresses public comments, which could take 5 to 8 weeks depending on the number of comments the Agency receives from stakeholders. However, addressing the comments could take much longer depending on the complexity of the issue and whether comments from stakeholders contradict one another. For example, SSA’s Office of General Counsel determines whether there are any legal issues as the Agency updates and addresses comments on the policy. If there are substantive comments, the Agency must spend time reworking the updates to address them. Additionally, SSA components have a chance to review the proposed policy and provide comments that must also be addressed. SSA’s Offices of the Chief Actuary and Budget also review the proposed policy for the costs and savings. Once the final changes have been incorporated, the Agency prepares a cost-benefit analysis, which—according to SSA—can take 2 to 4 months (see Figure C–2).

**Figure C–2: Final Rule Process**



## Appendix D– TIMELINE OF ACTIVITIES RELATED TO THE DEVELOPMENT OF THE SOCIAL SECURITY ADMINISTRATION’S OCCUPATIONAL INFORMATION SYSTEM

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The Social Security Administration (SSA) provides disability benefits to eligible individuals. To determine whether an adult is disabled, SSA uses a 5-step sequential evaluation process.<sup>1</sup> For Steps 4 and 5, SSA considers occupational information as it is generally performed in the national economy. SSA’s primary source of this information is the *Dictionary of Occupational Titles* (DOT), which has not been updated since 1991 and was replaced by the Occupational Information Network (O\*NET), which does not have the same level of detail as the DOT. Thus, in 2008, SSA began developing its own source of occupational information, which SSA calls the Occupational Information System. SSA will obtain much of the occupational information through a survey and the rest of the information from certain elements of O\*NET and other databases, including the Military Occupational Classification and Occupational Employment Statistics.

Table D–1 provides a timeline of activities for the life of the project.

**Table D–1: Timeline of Activities Related to the Development of SSA’s Occupational Information System**

Fiscal Year	Description of Events
2008 – 2012	<ul style="list-style-type: none"> <li>• Senior officials from SSA’s Office of Research, Demonstration, and Employee Support began overseeing the project.</li> <li>• SSA created an internal office, workgroup, and Occupational Information Development Advisory Panel of outside experts that met periodically from Fiscal Years (FY) 2008 through 2012.</li> <li>• SSA developed a research and development plan for collecting and housing occupational information.</li> <li>• SSA worked on activities in the plan that laid the groundwork for the project.</li> <li>• SSA began consulting with the Department of Labor’s (DoL) Employment and Training Administration (ETA) to better understand the elements of O*NET so that it could identify those elements that could be used for the Occupational Information System.</li> <li>• SSA began an interagency agreement with DoL’s BLS for assistance in collecting occupational information.</li> </ul>

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<sup>1</sup> 20 C.F.R. §§ 404.1520 and 416.920 (2012). To determine whether a child is disabled, SSA uses another process that is similar to the 5-step sequential evaluation process. 20 C.F.R. § 416.924 (2011).

Fiscal Year	Description of Events
2013	<ul style="list-style-type: none"> <li>• BLS developed a collection methodology consisting of a 3-year survey called the Occupational Requirements Survey, a collection protocol,<sup>2</sup> collection procedures as well as review, estimation, and validation processes. At this time, the survey did not include questions about the mental/cognitive demands of work.</li> <li>• BLS tested the collection of occupational information by sampling respondents from various businesses in three phases. After each phase, BLS identified challenges, discussed them with SSA, and refined the methodology, as needed.</li> <li>• BLS conducted calibration activities to ensure staff understood the collection concepts, questions, and procedures.<sup>3</sup></li> <li>• SSA formed a workgroup of disability vocational policy experts and contracted psychiatric and psychological consultants to identify information needed on the mental/cognitive demands of work, which BLS used to develop the corresponding questions.</li> </ul>
2014	<ul style="list-style-type: none"> <li>• BLS added the questions about the mental/cognitive demands of work to the survey.</li> <li>• BLS conducted additional testing, which showed the questions about the mental/cognitive demands of work were wordy and awkward to ask and did not fully capture the information SSA needs for adjudicating certain disability claims.<sup>4</sup> This led to revisions in the questions. The additional testing also showed the respondents had difficulty answering the questions about durations of certain physical demands of work.<sup>5</sup></li> <li>• BLS continued refining other aspects of the collection methodology.</li> <li>• SSA began a contract with a private company to build the Vocational Information Tool that will be used to house and access the Occupational Information System and will integrate with other SSA systems the Agency was using for disability adjudication.</li> </ul>

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<sup>2</sup> The collection protocol informed staff on how to collect the occupational information. For example, it informed staff to ask questions using a conversational approach and observe jobs whenever possible to confirm the information collected.

<sup>3</sup> For these activities, BLS had staff answer questions for the same jobs and went over the answers with them.

<sup>4</sup> DoL, BLS, *Occupational Requirements Survey Consolidated Feasibility Tests Summary Report*, p. 6 (FY 2014).

<sup>5</sup> DoL, BLS, *Occupational Requirements Survey Consolidated Feasibility Tests Summary Report*, pp. 4, 5, and 9 (FY 2014).

Fiscal Year	Description of Events
2015	<ul style="list-style-type: none"> <li>• BLS conducted a relatively wide-scale test involving a nationally representative group of organizations from the private sector and State and local governments that it designed to mimic as close as possible what would occur when BLS implemented the collection methodology. This test resulted in further revisions to the mental/cognitive demands questions.<sup>6</sup></li> <li>• The wide-scale test also resulted in revisions to the collection procedures. Immediately after the test, BLS conducted another where staff observed the same jobs they collected information on in the previous test and found there were high levels of agreement between what was observed and what was collected across all questions about physical demands of work—except for certain duration questions—which were still within reason, according to BLS.<sup>7</sup> In FY 2017, BLS revised its collection procedures to make it easier for respondents to answer these questions.</li> <li>• BLS continued refining other aspects of the collection methodology.</li> <li>• BLS researched ways to test the validity and reliability of the occupational information from BLS’ survey and sought advice on the matter from an outside expert.</li> <li>• BLS conducted another test only on the mental/cognitive demands questions and refined them again.</li> <li>• BLS began collecting the first of 3 years of occupational information (including mental demands of work for test-purposes only).</li> <li>• BLS started researching how often to update the occupational information.</li> <li>• SSA continued working with its contractor to build the Vocational Information Tool.</li> <li>• SSA formed cross-component workgroups to identify requirements for the Vocational Information Tool.</li> </ul>
2016	<ul style="list-style-type: none"> <li>• Senior officials from SSA’s Office of Disability Policy began to collaborate with senior officials from SSA’s Office of Research, Demonstration, and Employee Support in overseeing the project.</li> <li>• BLS finished collecting the first year of occupational information and began collecting the second year (including mental demands of work for test-purposes only).</li> <li>• BLS continued refining certain aspects of the collection methodology.</li> <li>• BLS contracted with Northeastern University to conduct a study how often to update occupational information. The study showed occupational information may remain current for 5 to 10 years.<sup>8</sup> Subsequently, SSA decided to update the information every 5 years.</li> <li>• SSA and its contractor built a prototype for the Vocational Information Tool.</li> </ul>

<sup>6</sup> DoL, BLS, *Occupational Requirements Survey; Preproduction Collection Report*, pp. 1, 3 and 4 (2015).

<sup>7</sup> DoL, BLS, *Occupational Requirements Survey Job Observation Report*, p. 1 and 2 (November 16, 2015).

<sup>8</sup> Northeastern University, *Dynamics of Occupational Change: Implications for the Occupational Requirements Survey*, pp. 1 and 77 (July 15, 2016).

Fiscal Year	Description of Events
2017	<ul style="list-style-type: none"> <li>• BLS revised its collection procedures to simplify the duration questions for respondents for the third year of collection.<sup>9</sup></li> <li>• SSA began analyzing the first year of occupational information to determine its effect on disability policy.</li> <li>• BLS published the first year of occupational information and finished collecting the second year of occupational information.</li> <li>• BLS revised the mental/cognitive demands questions once more and conducted an in-house test.</li> <li>• BLS began collecting the third year of occupational information (including mental demands of work for test-purposes only). This led to minor revisions in the mental/cognitive demands questions.</li> <li>• BLS continued to refine other aspects of the methodology.</li> <li>• BLS conducted calibration activities to ensure staff continued to understand the collection concepts, questions, and procedures—especially since BLS made some changes to them.</li> </ul>
2018	<ul style="list-style-type: none"> <li>• SSA finished analyzing the first year of occupational information and began analyzing the second year.</li> <li>• BLS published the combined first and second years of occupational information and will finish collecting the third year of occupational information.</li> <li>• BLS conducted a test on the revised mental/cognitive demands questions and will have the results of that test in FY 2018.</li> <li>• BLS was conducting a second job observation test and will have results from that test by the end of FY 2018.</li> <li>• BLS conducted additional calibration activities.</li> </ul>
2019 – 2020	<ul style="list-style-type: none"> <li>• BLS will begin collecting the second set of occupational information for which BLS will use a new sampling method to ensure it will collect information on occupations that were not included in the sample for the initial set. SSA anticipates this set of occupational information will include the occupations’ mental/cognitive demands. SSA will finish analyzing the second year of occupational information and analyze the third year.</li> <li>• SSA will publish the updated disability policy related to vocational analysis.</li> <li>• SSA will develop the training and rollout plans for the Vocational Information Tool. It will also conduct usability testing before rolling out the tool.</li> <li>• BLS will continue collecting the second set of occupational information.</li> </ul>
2021 – 2024	<ul style="list-style-type: none"> <li>• BLS will finish collecting the second set of occupational information, and SSA will update the Occupational Information System with this information.</li> </ul>

<sup>9</sup> DoL, BLS, *Occupational Requirements Survey (ORS) Collection Manual*, p. 1 (3<sup>rd</sup> Edition July 2017).

## Appendix E – AGENCY COMMENTS

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### SOCIAL SECURITY

#### MEMORANDUM

Date: June 13, 2018 Refer To: S1J-3

To: Gale S. Stone  
Acting Inspector General

From: Stephanie Hall *Stephanie Hall*  
Acting Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, “The Social Security Administration’s Efforts to Develop its Own Source of Occupational Information for Use in its Disability Programs” (A-01-15-15035) -- INFORMATION

Thank you for the opportunity to review the draft report. We are committed to continuing our efforts to collect updated and accurate occupational information for adjudicative use in our disability programs. The new occupational information will assist us in meeting our strategic objective to improve the quality, consistency, and timeliness of our disability decisions by providing our adjudicators with current, consistent, and high quality occupational data.

We will continue to expand our data collection by adding mental and cognitive survey questions and adjusting our collection methodology so that more occupations are captured beginning in September 2018. Our target date for implementing the Occupational Information System (OIS) is fiscal year 2020, and we continue to work diligently to avoid delays in its implementation. We also agree that it is important to allocate sufficient funds on an ongoing basis so that the information in OIS remains current and accurate.

Please let me know if we can be of further assistance. You may direct staff inquiries to Trae Sommer at (410) 965-9102.

Attachment

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