

Occupational Information Development Advisory Panel

Recommendation Number 8 to the Social Security Administration for OIS Development Planning

In keeping with its charge to provide independent advice and guidance on plans and activities to develop a new Occupational Information System (OIS) that a) help the Social Security Administration (SSA) meet its burden of proof and be forensically defensible, b) reflect all work nationally, and c) link residual functional capacity to the requirements of work and that replaces the *Dictionary of Occupational Titles* (DOT) for disability adjudicative decisions, The OIDAP (Panel) strongly recommends that SSA:

1. take the immediate step to develop an overarching project plan and timeline that specifies SSA's needs and objectives with regard to occupational information;
2. develop a fully articulated research plan and associated processes that provide for the coordination of necessary scientific research and allow for the incorporation of findings and results as appropriate;
3. prepare and make available to the Panel the overall project plan, including the attendant research plans, for advice and recommendation before further developmental activities for the OIS proceed;
4. make public the aforementioned project and research plans, thus delineating how the agency plans to proceed in its efforts to develop said OIS.

The project plan should include scientific and programmatic justification for SSA's efforts going forth, as well as identification of the criteria that will ultimately be utilized to assess the performance of any new OIS system.

To fulfill the requirements of aforementioned project plan, SSA must also develop and make public a scientifically sound research plan that addresses the needs delineated by the project plan and that will guide the entire OIS development process. To meet SSA user needs, maintain stakeholder confidence, and ensure legal defensibility, it is critical that all intended research protocols be developed with oversight by internal scientists well-versed in research methods along with programmatic specialists and be reviewed by the panel prior to data collection.

Examples of issues that should be addressed by the recommended research plan include (but are not limited to): how to develop a content model that is legally defensible and possesses strong evidence of validity, determine the appropriate sampling methodologies for pilot testing of all instruments, develop a job analysis tool that will be utilized for collecting occupational information (including appropriate scales, methods of data collection, sources of data, etc.), and so on. The Panel

As approved by the Occupational Information Development Advisory Panel at its teleconference meeting November 17, 2010.

recognizes that any plan that is developed will be necessarily dynamic as new information and data may inform future steps; however, this does not negate the need for a published plan that is scrutinized for scientific rigor and adequacy.

In conclusion, the Panel wishes to emphasize that to achieve the goal of a legally defensible OIS, rigorous scientific methods must be utilized. The original Recommendations and associated subcommittee reports identified numerous empirical studies that should be conducted as part of the process of developing a new OIS; the Agency should examine these recommendations and identify those proposed studies that meet the requirements of good science and SSA disability program law and regulation for coordination into the project and research plans going forth. In addition, those existing SSA efforts that meet the requirements of good science and SSA disability program law and regulation should also be coordinated into the project and research plans going forth.