

2014 Supporting Statement for a nationwide Pre-Production Test of the proposed Occupational Requirements Survey

Justification, Part A.

Overview

This request is for the approval of a nationwide, pre-production test for the Occupational Requirements Survey (ORS). Under the ORS program, the Bureau of Labor Statistics (BLS) will conduct a nationwide test to evaluate ORS survey processes and operations in a possible production environment at the request of the Social Security Administration (SSA). Data collection and capture will run for approximately six months and will conclude in FY 2015. A full evaluation of the data elements captured for this pre-production test will be followed by an evaluation of the processes, survey design, and other test program elements.

Estimates produced from the data collected by the ORS Pre-Production Test will be used by the SSA to determine how to use updated requirements data in administering Social Security Disability Insurance (SSDI) program.

The following data will be collected in this pre-production test as defined by the SSA's disability program and is data that the NCS does not currently collect:

- 1) An indicator of "time to proficiency," defined as the amount of time required by a typical worker to learn the techniques, acquire the information, and develop the facility needed for average job performance. This measure is comparable to the Specific Vocational Preparation (SVP) used in the [Dictionary of Occupational Titles](#) (DOT.)
- 2) Physical Demand characteristics/factors of occupations, measured in such a way to support SSA disability determination needs. These measures are comparable to measures in Appendix C of the [Selected Characteristics of Occupations](#) (SCO.)
- 3) Environmental Conditions, measured in such a way to support SSA disability determination needs. These measures are comparable to measures in Appendix D of the [SCO](#).
- 4) Data elements that describe the mental and cognitive demands of work.
- 5) Occupational Task lists data as identified in the Employment and Training Administration's (ETA's) O*Net Program in order to validate the key tasks common across establishments and identify other tasks commonly performed.

Some data needed for ORS are collected by NCS currently on its sample of establishments, these data will be collected with the same methodology for ORS sample establishments that are not also in the NCS sample. The general establishment data collected on establishments in the survey samples will be the same for ORS and NCS. The Probability Selection of Occupations (PSO) methodology—a disaggregating technique for selecting individual items from a large number of items—will also be used by both ORS and NCS. For ORS and NCS, these items are employees, occupations, divisions, or sub-units depending upon the application of the sampling procedure being used. Wages are elements of the ORS data already collected by the NCS wages

(earnings). The work level of jobs data methodology (referred to as leveling) will also be used in the ORS survey, as it is currently in NCS.

The work level data for each of the four factors has several levels reflecting increasing duties and responsibilities, and there are point values associated with each level.

The four factors are:

1. Knowledge – the amount of knowledge required for the job
2. Job controls and complexity – the type of direction received and the nature of the job
3. Contacts – the nature and purpose of contacts within a job but outside the supervisory chain
4. Physical environment – risks involved and physical demands

The elements above and the unique ORS data elements will be collected by BLS Field Economists. “Field economist” is the BLS title for those who collect data from respondents. To collect ORS data, field economists will interview respondents who represent the companies, organizations, and government units within the sample. Field economists conduct these interviews by visiting the company or by phone or e-mail contact. Other communication media, such as faxes, mail, websites, and e-mail are used to assist the process, depending on the wishes of the respondents.

When asking questions, field economists do not rely on a scripted interview. Instead, they ask probing questions to get the information. Field economists might ask questions in different ways to different respondents. Some respondents will be experts in the field of human resources, job requirements or compensation, while other respondents merely maintain pay and benefit records. Because of the different levels of respondent knowledge, combined with the scope and complexity of ORS data collection, scripting an interview that covers most situations would be very difficult.

For ORS collection, the respondent does not complete the collection forms. The field economist asks for the needed information and uses the collection forms as a note-taking device. This information will then be entered into two electronic data systems (different parts are entered into each system); one a web-based computer database ORS is developing and the other the NCS Integrated Data Capture System (IDC). Field economists will use the newly developed ORS collection system after the completion of the interview with the respondent. The existing IDC system that NCS currently uses will be used for the entry and capture of general information, leveling, and wages for ORS sample establishments in this test survey.

Respondents normally provide a copy of a recent establishment payroll run either electronically or printed and those payroll data are either electronically reformatted or hand entered into the IDC system by the field economist. ORS policy is to collect the data in whichever form is easiest for the respondents to provide and then reformat those data to conform to ORS requirements. This approach could cause some non-sampling error, but new collection training and quality assurance programs are in place to lessen any impact on data collection.

1. Necessity of the Information Collection

The Social Security Administration (SSA) is currently using the Dictionary of Occupational Titles (DOT) in its disability determination process. The DOT was last partially updated in 1991 and fully updated in 1971. As occupations and their duties and responsibilities have changed in the last 20 plus years, the relevance of DOT-based information has declined.

Occupational information collected through ORS could potentially help administer the disability insurance benefits of the Social Security Act [Section 223\(d\)\(2\)\(A\)](#) and accompanying regulations.

The authority for the BLS to perform special work or services on a cost basis is 29 United States Code §§ 9.

2. Uses of Information

The Social Security Administration will use this test data to determine if updated employment requirements data for occupations can help in the determination that SSA uses in administering Social Security Disability Insurance (SSDI) program.

3. Electronic Collection Methods

BLS field economists obtain data from respondents through personal interview, telephone, e-mail, fax, and web-site contacts. After the interview, BLS field economists will enter collected data into two electronic systems. The first, an existing Integrated Data Capture (IDC) system that NCS currently uses will be used for the entry and capture of general information, leveling, and wages for ORS sample establishments in this test survey. The application is designed for use on both laptop and desktop personal computers, and runs in the Microsoft Windows operating system.

For the new data elements in ORS, a web-based, computer database system using Oracle will be used and is currently in development and called the Compensation Information Entry and Review Application (CIERA). Field economists will use this newly developed ORS collection system after the completion of the interview with the respondent.

Some general information does not have to be collected from survey respondents as that data can get that data from the Quarterly Census of Employment and Wages (QCEW). QCEW is a relational database of business establishments linked longitudinally and based on the microdata submitted quarterly by States from Unemployment Insurance (UI) tax files. The QCEW serves as a sampling frame for the ORS and other establishment-based surveys. BLS data elements on these QCEW files include information on monthly employment, quarterly wages, business name and addresses, industry classification, geo codes, and other administrative data. Every business establishment contains a unique identifier that allows for tracking of individual establishments at

the micro level across quarters for the United States. The BLS uploads these data into its computer system before the field economist visits the establishment, thereby reducing the burden on respondents to provide this basic information.

4. Efforts to Identify Duplication

For test sample establishments that are in the current NCS sample, the ORS will use the NCS data and only collect data on the new ORS data elements for those establishments.

5. Impact on Small Businesses

This pre-production ORS test sample is designed to provide occupational requirement data that are representative of the national labor market. Therefore, information is collected from establishments of all sizes. Any establishment with at least one employee is a potential respondent. This survey is a one-time test. Respondents will provide data only once.

The aggregate collection burden on small establishments is significantly less than the burden on medium and large establishments. For all establishments, including small establishments, an optimum allocation design is obtained by sorting establishments within the industry by employment size and sampling the industry with probability proportionate to the amount of employment contained in those industries. Therefore, larger firms have a greater chance of being selected. Furthermore, small establishments will have a smaller collection burden, because BLS collects data on fewer occupations in small establishments.

6. Consequences of Not Collecting the Data or Less Frequent Data Collection

The Social Security Administration, Members of Congress, and representatives of the disability community have all identified collection of updated information on the requirements of work in today's economy as crucial to the equitable and efficient operation of the Social Security Disability (SSDI) program. The information currently available is more than 20 years old.

7. Special Circumstances

There are no special circumstances for this collection.

8. Federal Register Notice/Outside Consultation

Federal Register Notice

Eight public comments were received as a result of the Federal Register notice published in the Federal Register, 79 FR 16058 on March 24, 2014. Public comments were from three establishments, three individuals, and two organizations in the rehabilitation and physical therapy community. Responses below are from BLS in conjunction with the Social Security Administration (SSA.)

The first commenter (an individual) stated that they felt this data could be estimated from existing Federal Government surveys. They additionally felt that the costs and efforts for this survey “are not worth it.”

The Dictionary of Occupational Titles (DOT) that the Social Security Administration uses in the disability determination process was last updated in 1991. The Employment and Training Administration (ETA) that funded this publication and the related research have stopped using this publication and its data. Currently ETA funds the O*NET and uses it for occupational information. The O*NET was designed for career exploration and does not define and measure occupational information in a way that SSA needs for use in its disability determination process. This lack of needed data lead to the development of ORS for potential use in the disability determination process.

The second commenter (a business establishment) stated they have developed, and with others, use systems that are based on the DOT and do not feel that SSA should move away from the DOT. They stated the O*NET is vague. They proposed that if a new system is being developed, it should add a new educational goals system for “occupational justice” that focuses on real jobs using measurable characteristics. They also propose that meaningful documentation should be brainstormed for use in legislation, public enrichment, and definition of work for surveys.

The reasons that ORS feasibility testing is based on the Standard Occupational Classification (SOC) system and the O*NET are: the USDOL no longer uses or supports “The Dictionary of Occupational Titles (DOT)”; it was created by the Employment and Training Administration and was last updated in 1991, many occupations in it were last evaluated in the 1970’s. The taxonomy used to classify occupations in the DOT was unique to that publication.

USDOL and other Federal statistical agencies are mandated to use the 2010 Standard Occupational Classification (SOC) system to classify workers. An updated version of the SOC is scheduled for release in 2018. The Employment and Training Administration (ETA) funds the O*NET program and it is one of nation's primary sources of occupational information. O*NET data are continually updated by surveying a broad range of workers from each occupation, occupational experts and occupational analysts.

The third commenter (an organization) noted that earlier ORS tests with dual coding of both the DOT and SOC/O*NET show variance between occupations coded in both systems. The defunct DOT system updated and developed from the 1938 to 1991 and then funded by USDOL/ETA did rely on occupational observations.

The organization sees a potential adverse impact of collecting invalid data if survey respondents did not have adequate understanding of the job(s) at their establishments. This organization recommends that BLS undertake a validation study to verify that ORS data collected are representative of occupation’s actual physical demands when observed and incumbent and supervisor interviewed.

This organization has indicated that finger dexterity and manual dexterity are not included in ORS. ORS captures fine manipulation which is defined as, “Picking, pinching, or otherwise working primarily with the fingers rather than the whole hand or arm.” ORS captures gross

manipulation which is defined as, “Seizing, holding, grasping, turning or otherwise working with hand(s).” This organization noted an earlier ORS test having problems with “Fine Manipulation” and “Gross Manipulation” differing from the DOT with matches both higher and lower. After that test and for the preproduction test, ORS is breaking out keyboarding as a separate element. Also, based on changes in technology since the last update of the DOT, SSA expect to see inconsistencies with DOT data elements such as this.

The ORS Preproduction Test survey and earlier ORS test surveys will and did use The Revised Handbook for Analyzing Jobs (1991) by the Employment and Training Administration of the United States Department of Labor (USDOL/ETA) as a resource to provide information on job analysis. ORS test surveys also have used and will continue to use the O*NET task lists. The ORS Test Surveys are using the O*NET-SOC for occupational classification.

The Department of Labor replaced the DOT with O*NET and is not using Functional Job Analysis in O*NET. There is no existing nationally representative occupational information system that provides current DOT like data.

As noted for the second commenter: The reasons ORS feasibility test is based on the Standard Occupational Classification (SOC) system and the O*NET are: the USDOL no longer uses or supports “The Dictionary of Occupational Titles (DOT)”; it was created by the Employment and Training Administration and was last updated in 1991, many occupations in it were last evaluated in the 1970’s.

USDOL and other Federal statistical agencies use the 2010 Standard Occupational Classification (SOC) system to classify workers. An updated version of the SOC is scheduled for release in 2018. The Employment and Training Administration funds the O*NET program and it is one of nation's primary sources of occupational information. O*NET data is continually updated by surveying a broad range of workers from each occupation, occupational experts and occupational analysts.

As the ORS Preproduction Test is a voluntary survey and BLS is very cognizant of respondent burden; most data for occupations will come from human resource directors, owners and location managers. In the NCS survey, BLS has seen that human resources staff, owners, and location managers have detailed knowledge of the occupations they develop, hire for, or direct. In the ORS Preproduction Test, current NCS occupational point factor work leveling will be done so pay factors will be collected. In some cases field economists will observe occupations and interview incumbents or their supervisors; but that is not done for the majority of establishments or occupations matched in the ORS survey. BLS must balance data quality, respondent burden, and survey costs with alternative methods, such as observing the work and time and motion studies, when developing the ORS methodology.

The fourth commenter (an organization) felt that ORS proposed knowledge and education elements need finer breakouts to be more useful in disability claims hearings (an example being the level at which a worker must be able to read and write: short sentences, understanding of safety sign, etc.) This organization felt some of the factors being collected in the ORS Preproduction test could use some further clarification based on what they find from disability claims hearings. They have comments on a number of physical demands factors; example are

they felt that standing and walking should be distinct functions for collection. Depth perception should be included in “Hearing and Visual Requirements.” ORS does have near visual acuity, far visual acuity, and peripheral vision standards, but currently this test is not collecting data on the depth perception requirements of an occupation.

A comment was made on the draft ORS collection forms use of the word “Seldom” in two different definitions. In the revised ORS collection forms the term “Seldom” in lifting and carrying relates to a duration for an activity. Seldom is up to 2% (up to 9.6 minutes in an 8 hour day.) Time duration is broken into 4 ranges: up to 2%, 2% up to 33%, 33% up to 66%, 66% or more.

SSA developed the physical and mental elements that are most beneficial to the adjudication of disability claims. SSA derived this list from a large compilation of data elements drawn from a number of sources including disability policy, the Occupational Information Development Advisory Panel (OIDAP), stakeholders that presented to the OIDAP, and SSA disability policy experts. SSA needed to limit the number of data elements that BLS collects in ORS to those that are most critical to disability adjudication. When the new SSA occupational information system (OIS) is operational, the adjudication process will remain an individual assessment of a claimant’s ability to perform work. The OIS will not eliminate the need for adjudicative judgment or expert vocational input in some cases.

The lack of industrial organization psychologist on the SSA or NCS work groups was mentioned. The NCS program and now the ORS program do use and have cognitive psychologists on our work groups.

This organization also felt that both the direct supervisors and workers should be interviewed to collect the full range of the activities and work performed for an occupation.

The fifth commenter (an individual) felt that the O*NET and its methodology should be the basis of any SSA system to capture up-to-date occupational data and that ORS data would be a duplication of the O*NET database.

ORS uses the O*NET-SOC for occupational coding and classification. The Bureau of Labor Statistics and all Federal agencies that publish occupational data for statistical purposes are required to use the SOC to increase data comparability (and thus, data utility) across Federal programs. The O*NET taxonomy is aligned with the SOC but in some cases describes occupations at a more detailed level. The O*NET task lists for occupations are used in ORS data collection to cross check on tasks the employer, human resources official, supervisor, or employee states the occupations entail.

The O*NET does not have the physical demands data by duration, force, time, and weight as SSA needs. So ORS, while using the O*NET-SOC for occupational classification, has to collect more detailed occupational requirements than what the O*NET provides. The O*NET does not describe the physical and mental demands of work in a way that easily relates to the functional abilities of people as the SSA disability program requires. However, SSA recognizes that there are elements of O*NET that will be useful in the SSA occupational information system (OIS).

In order to avoid duplicating data collection efforts, SSA will work with DOL ETA to determine which O*NET elements will be most beneficial to the OIS and the SSA claims adjudication process.

The sixth commenter (a business establishment) stated that “the current and historic focus of the NCS is on industry/establishment sampling rather than occupational sampling.” The commenter also stated that “it was difficult to figure out what occupations are more likely to be found in a specific establishment/industry.”

The National Compensation Survey (NCS) uses Probability Selection of Occupations (PSO) for occupational selection. PSO is a disaggregating technique for selecting individual occupations. The probability of an occupation being selected is proportional to its size (probability proportional to size or PPS sampling). That is, the greater the number of employees in an occupation in an establishment, the greater the chance the occupation will be selected.

For occupations selected during NCS data collection, field economists obtain wage data by occupation and work level. Work levels are determined using a "point factor leveling" process (modeled on the Factor Evaluation System of US Office of Personnel Management.) This procedure incorporates four occupational leveling factors to determine the work level. The factors are:

- Knowledge
- Job controls and complexity
- Contacts
- Physical environment

All selected occupations in the ORS Preproduction Test survey will also have work level data and wages collected.

The sixth commenter also suggested that OES data staffing patterns and location quotient values for geographic sampling could be used. Both the SSA disability program and NCS are national programs and ORS will provide occupational data that is nationally representative.

Similarly to other commenters, the sixth commenter felt that occupations should be observed as performed and measured when possible. The commenter suggested that ORS should go on site at establishments and perform actual measurements of each selected job to confirm that the HR department assertions of duties and function are correct. BLS balances data quality, respondent burden, and survey costs with alternative methods, such as observing the work and time and motion studies, when developing the ORS methodology. Since ORS is a voluntary survey, there is a clear trade-off between respondent burden and response rates impacting the data quality, precluding time and motion studies and job observations for all occupations from being the norm for ORS data collection.

It was stated that the disability industry has not been able to readily embrace the O*NET (8-digit SOC). Some of the reasons stated were: the data are self-reported, poor definition of factors, and

fuzzy scales. ORS will verify if employer/supervisory reported occupational tasks are the same as the O*NET task list.

Comments were also submitted regarding the ORS Forms, which for ORS are really note taking devices for BLS field economists to use, as survey respondents do not fill out these forms (they are not questionnaires per say.) The commenter felt that some occupation profiles by industry would help collection.

The seventh commenter (a business establishment) stated that ORS was missing some important cognitive factors for use in determining a person's ability to work. The commenter felt that task complexity is too broad a factor and impractical for worker-job matching. It was stated that the task complexity element should be deconstructed into its component factors and functionally scaled, as used in the DOT. They liked that ORS is using hours per day as it is more understandable than using a percentage of time for capturing exposure.

Another comment was that the DOT's underlying premise of all occupations working an 8 hours shift and 40 hours a week was not the best. ORS will be collecting the permanent work schedule of sampled occupations and the actual hours and earning from a recent payroll. The SSA's residual functional capacity assessments are based on the most an individual can do despite their medically determinable impairment on a regular and continuing basis. A regular and continuing basis per SSA policy means 8 hours a day, for 5 days a week, or an equivalent work schedule.

It was stated that manual dexterity and finger dexterity should be broken out by preferred hand and both hands. ORS does break out physical demands by one or both hands. As mentioned earlier, ORS has now broken out keyboarding as a separate element.

The seventh commenter also stated that the actual ORS collection form should have more referencing to ranges and scaling. The commenter mostly liked the 5 level aptitude scales for cognitive elements which ORS has revised to use for all cognitive elements.

The SSA is developing an occupational information system designed to facilitate the adjudication of claims under current policy. SSA uses occupational information to determine whether individuals with mental and physical limitations resulting from medically determinable impairments retain the functional ability to perform work.

The eight commenter (an individual) stated that while SOC is good for primary classification, the "user community" indicates that the SOC needs greater granularity for use in econometric applications. The commenter felt that the ORS tie between SOC and O*NET use needs further explanation. The commenter also stated that a dozen occupations are critical to have information about in SSA adjudication and a survey using occupational sampling might not hit these occupations.

Concerns were stated that the cognitive elements being collected were not part of the disability lexicon or how they typically measure cognitive abilities. Like other commenters, this commenter also expressed concern about ORS not observing and measuring the work of surveyed occupations themselves. The commenter felt usability analyses should be done on how

this new data can be used in the SSA Disability Determination process. This is really outside the scope of the ORS Preproduction Test.

As stated earlier, SSA program experts developed the mental data elements that they believe will be the most beneficial to the adjudication of disability claims. These elements were further refined and revised based on the BLS experience and expertise with work leveling collection and the results of earlier ORS testing. Also, SSA's policy specifies that the check-blocks on SSA's Mental Residual Functional Capacity Form (Form SSA-4734-F4-SUP) do not constitute the claimant's mental residual functional capacity. The psychological consultant's narrative which explains the most the claimant can do despite his or her impairment is the actual mental residual functional capacity. Therefore, incongruence between the terminology used in the ORS and terminology used on the mental residual functional capacity form will not create inconsistencies when evaluating claims. In addition, currently SSA is developing a new form in conjunction with proposed revisions to the mental disorder listings (published in Notice of Proposed Rulemaking, 08/19/10) that will be used to document the severity of mental impairments. Finally, SSA anticipates that some amount of adjudicative judgment by disability examiners and vocational experts will still be required when adjudicating claims, even with the new occupational information. SSA will continue to explore other cognitive elements of work that may be useful in disability adjudication process.

Outside Consultation

BLS staff engaged in extensive consultation with staff of the Social Security Administration's Office of Program Development and Research on all aspects of the survey.

BLS staff consulted with staff of the Department of Labor's Employment and Training Administration (ETA) to learn more about the Occupational Information Network (O*NET) system.

BLS staff presented a paper on the proposed survey design and solicited comments at the 2013 Joint Statistical Meeting (JSM).

BLS staff attended conferences sponsored by the following organization to learn more about the needs of the stakeholder community and possible uses of ORS data by them:

- National Association of Disability Examiners (NADE)
- International Association of Rehabilitation Professionals (IARP)
- American Board of Vocational Experts (ABVE)
- National Association of Disability Representatives (NADR)
- National Organization of Social Security Claimants' Representatives (NOSSCR)

BLS was contacted by representatives of the following organizations, who offered suggestions on the survey design and content.

- WorkAbility Network and WorkerFIT
- SkillTRAN, LLC
- International Association of Rehabilitation Professionals (IARP)

9. Payments to Respondents

No payments or gifts will be provided to any respondents.

10. BLS Confidentiality Policy

The Confidential Information Protection and Statistical Efficiency Act of 2002 (CIPSEA) safeguards the confidentiality of individually identifiable information acquired under a pledge of confidentiality for exclusively statistical purposes by controlling access to, and uses made of, such information. CIPSEA includes fines and penalties for any knowing and willful disclosure of individually identifiable information by an officer, employee, or agent of the BLS.

Based on this law, the BLS provides all non-government respondents with the following confidentiality pledge/informed consent statement:

The Bureau of Labor Statistics, its employees, agents, and partner statistical agencies, will use the information you provide for statistical purposes only and will hold the information in confidence to the full extent permitted by law. In accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 (Title 5 of Public Law 107-347) and other applicable Federal laws, your responses will not be disclosed in identifiable form without your informed consent.

This statement appears on the private industry collection forms and is on our web data collection site.

For the ORS test program, the pledge of confidentiality is not extended to State and local government entities, unless specifically requested, since the data they provide are a matter of public record.

BLS policy on the confidential nature of respondent identifiable information (RII) states that “RII acquired or maintained by the BLS for exclusively statistical purposes and under a pledge of confidentiality shall be treated in a manner that ensures the information will be used only for statistical purposes and will be accessible only to authorized individuals with a need-to-know.

11. Sensitive Questions

Aside from the sensitivity attached to payroll information, no sensitive questions are asked during the survey.

12. Estimated Reporting Burden

Estimates of respondent burden are provided in this section for all activities associated with the ORS program. For the purposes of the discussion of respondent burden and BLS cost, the ORS is an initiation-only survey. For this survey, respondents are contacted for the first time and only provide the data once. For an ORS establishment that is also a sample establishment in the NCS survey, the collection of three forms and the associated time are covered and charged in the existing OMB Clearance for the National Compensation Survey (NCS) 1220-0164, which

expires on 4/30/2015. These NCS forms are for the collection of establishment information, work leveling, and wages, and combined take 64 minutes of respondent burden and these hours are captured in the approved NCS Clearance package.

Broadly stated, both private industry and State/local government establishments in the ORS Pre-Production Test survey collections fall into the following 3 categories below:

Activity (1a) - Initiation of establishments in the ORS test sample where general establishment information, pay, work levels, and job requirements are collected.

Activity (1b) - Initiation of establishments in the ORS test sample which are in the current NCS sample where ORS only collects the job requirements.

Activity (2) - Re-interview for quality assurance activities of ORS job requirements for initiations.

Estimates of net respondent burden associated with these collection activities in FY 2014 and FY 2015 are broken out by affected sectors (private sector, State and local governments) and provided on the following pages.

Table 1a. Anticipated private sector sample burden for the ORS Pre-production Test activity by type for FY 2014

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	247	1	247	140	576
Activity (1b) Initiation of ORS NCS overlap establishments	122	1	122	76	155
Activity (2) Re-interview for quality assurance activities	19	1	19	15	5
FY 2014 TOTALS	388		388		736

Table 1b. Anticipated private sector sample burden by activity type for FY 2015.

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	1205	1	1205	140	2812
Activity (1b) Initiation of ORS NCS overlap establishments	594	1	594	76	752
Activity (2) Re-interview for quality assurance activities	90	1	90	15	23
FY 2015 TOTALS	1889		1889		3587

Table 2a. Anticipated State and local government sample burden for the ORS Pre-production Test activity by type for FY 2014

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	44	1	44	140	103
Activity (1b) Initiation of ORS NCS overlap establishments	21	1	21	76	27
Activity (2) Re-interview for quality assurance activities	3	1	3	15	.75
FY 2014 TOTALS	68		68		130.75

Table 2b. Anticipated State and local government sample burden by activity type for FY 2015

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	212	1	212	140	495
Activity (1b) Initiation of ORS NCS overlap establishments	105	1	105	76	133
Activity (2) Re-interview for quality assurance activities	16	1	16	15	4
FY 2015 TOTALS	333		333		632

The table below summarizes the data, including figures on the actual number of respondents to be contacted each year.

Table 3: Anticipated private sector average responses and burden by Fiscal Year

Fiscal Year	Respondents	Average responses per year	Total # of Responses *	Average minutes per response	Total hours
FY 2014	369	369	388	114	736
FY 2015	1799	1799	1889	114	3587

* Initiations and quality assurance contacts

Table 4: Anticipated State and local government average responses and burden by Fiscal Year

Fiscal Year	Respondents	Average responses per year	Total # of Responses *	Average minutes per response	Total hours
FY 2014	65	65	68	115	130.75
FY 2015	317	317	333	114	632

* Initiations and quality assurance contacts

Table 5. Anticipated burden by activity type in FY 2014 – September 2014

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	291	1	291	140	679
Activity (1b) Initiation of ORS NCS overlap establishments	143	1	143	76	181
Activity (2) Re-interview for quality assurance activities	22	1	22	15	6
FY 2014 TOTALS	456		456		866

Table 6. Anticipated burden by activity type in FY 2015 – October 2014 to March 2015

Collection Activity	Number of Respondents Per Activity (Net)	Responses Per Respondent	Total Annual Responses by Activity	Minutes Per Response	Total Hours
Activity (1a) Initiation of ORS	1417	1	1417	140	3306
Activity (1b) Initiation of ORS NCS overlap establishments	699	1	699	76	885
Activity (2) Re-interview for quality assurance activities	106	1	106	15	27
FY 2015 TOTALS	2222		2222		4218

The table below summarizes the data, including figures on the actual number of respondents to be contacted each year.

Table 7: Anticipated average responses and burden by Fiscal Year

Fiscal Year	Respondents	Average responses per year	Total # of Responses	Average minutes	Total hours
FY 2014	434	1	456	114	866
FY 2015	2116	1	2222	114	4218

* Initiations and quality assurance contacts

Overview of ORS preproduction collection forms

These forms are primarily used as note-taking devices by the field economists (BLS staff). The field economists ask probing questions that will vary depending on the knowledge level of the respondent. The forms provide the field economist with a list of the information required for the survey, not a list of all questions asked. For quality assurance re-interviews, the field economists will ask for specific items of data in a prescribed manner from data stored in the electronic database. ORS considers the establishment data in the electronic databases the official copy of the establishment data for pre-production test survey purposes.

Table 8. Functions and uses of ORS forms

Form	Function	Activities used	Time
Establishment collection form (ORS Form 1 PP-1G)	Government General Establishment Information; records check of these data	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 19 minutes for activity 1a. Time 5 minutes for activity 2
Establishment collection form (ORS Form 1 PP-1P)	Private Industry General Establishment Information; records check of these data	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 19 minutes for activity 1a. Time 5 minutes for activity 2
Earnings form (ORS Form 2 PP-2G)	Government Earnings data; records check of earnings data	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 20 minutes for activity 1a. Time 5 minutes for activity 2
Earnings form (ORS Form 2 PP-2P)	Private Industry Earnings data; records check of earnings data	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 20 minutes for activity 1a. Time 5 minutes for activity 2
Work Level (ORS Form 3 PP-3G)	Government Documenting work level of occupation; records check of this collection	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 25 minutes for activity 1a. Time 5 minutes for activity 2
Work Level (ORS Form 3 PP3-3P)	Private Industry Documenting work level of occupation; records check of this collection	ORS initiation (1a); Quality assurance checks job requirements initiation (2)	Time 25 minutes for activity 1a. Time 5 minutes for activity 2
Occupation requirements (ORS Form 4 PPD-4G)	Government initiation collection of vocational preparation, cognitive elements, physical demands, environmental conditions, and job tasks; records check of this collection	ORS initiation (1a); ORS initiation with NCS (1b); Quality assurance checks job requirements initiation (2)	Time 76 minutes for activity 1a. and 1b. Time 5 minutes for activity 2

Occupation requirements (ORS Form 4 PPD-4P)	Private industry initiation collection of vocational preparation, cognitive elements, physical demands, environmental conditions, and job tasks; records check of this collection	ORS initiation (1a); ORS initiation with NCS (1b); Quality assurance checks job requirements initiation (2)	Time 76 minutes for activity 1a. and 1b. Time 5 minutes for activity 2
---	---	---	--

Table 9: Anticipated respondent collection burden by forms total for FY 2014 and FY 2015

Form	Total Respondents Per Form	Frequency	Total Annual Responses	Average Minutes for the Predominant Form Use	Total Hours
Establishment collection form (ORS Form 1 PP-1G)	256	1	256	19	81
Establishment collection form (ORS Form 1 PP-1P)	1452	1	1452	19	460
Earnings form (ORS Form 2 PP-2G)	256	1	256	20	85
Earnings form (ORS Form 2 PP-2P)	1452	1	1452	20	484
Work Level (ORS Form 3 PP-3G)	256	1	256	25	107
Work Level (ORS Form 3 PP3-3P)	1452	1	1452	25	605
Occupation requirements (ORS Form 4 PPD-4G)	382	1	382	76	484
Occupation requirements (ORS Form 4 PPD-4P)	2168	1	2168	76	2746
TOTALS	7674		7674		5052

* Does not include quality assurance re-interviews (QTRP) burden of 128 contacts and 32 hours of respondent burden.

Individual respondent cost per year (for all responses) is expected to be an average of \$78.64 for FY 2014, and \$78.64 for 2015. This amount is based on an average cost of \$41.39 per hour per respondent. The estimate, based on past experience, is that 70 percent of reporting time comes from professional and related workers, and the remaining 30 percent comes from office and administrative support workers. Professional and related specialty earned an average of \$48.63 per hour in total compensation; office and administrative support workers earned an average of \$24.49 per hour in total compensation. (Hourly costs of pay and benefits measured by the

Employer Cost for Employee Compensation data series for Civilian workers in September, 2014.) <http://www.bls.gov/news.release/pdf/ecec.pdf> The figure of \$41.39 is a weighted hourly average.

Estimated annualized cost to all respondents for all activities is \$35,844 in FY 2014, and \$174,583 in FY 2015. These totals are based on an average hourly cost of \$41.39 to the respondent.

13. Cost Burdens to Respondents

There are no capital and start-up costs or operation and maintenance and purchase of service costs resulting from the collection of this information.

14. Estimated Cost of the Survey

The ORS Pre-Production Test is part of the Interagency Agreements between BLS and SSA. The cost of the FY 2014 Agreement is \$15 million.

15. Program Changes or Adjustments

The ORS Pre-Production Test survey is a new collection.

16. Plans for Publication

The ORS data collected in this pre-production test are expected to be published as part of a research article and an ORS public report with analysis of estimates computed. This information will be made available on the www.bls.gov website.

A limited number of estimates will also be provided to SSA for use in determining how to update the disability determination process.

ORS Pre-production Test Time Schedule

Data Collection September 2014 to March 2015

Completion of Report September 2015

Publication Date September 2015

17. Approval to not Display the OMB Expiration Date

Approval to not display the expiration date for OMB approval is not being sought.

18. Exceptions to the Certification Statement

There are no exceptions to the certification statement.