

SUPPORTING STATEMENT FOR THE OCCUPATIONAL REQUIREMENTS SURVEY

OMB CONTROL NO. 1220-0189

This clearance request is classified as a revision. The sample size of the ORS is being increased due to collection non-response rates experienced during the pandemic. Item 12 has been updated to reflect the new burden estimates and a detailed list of changes is provided in item 15 below. Part B items 1b and 4a have also been updated to reflect this change and current testing activities.

Overview

This request is for approval of the Occupational Requirements Survey (ORS) 1220-0189. Under the ORS program, the Bureau of Labor Statistics (BLS) conducts the ORS at the request of the Social Security Administration (SSA). This clearance package covers three years of collection starting in 2021 and ending in 2024. The data elements have been evaluated by both BLS and SSA while the sample design has been thoroughly evaluated by BLS.

Estimates produced from the data collected by the ORS will be considered by the SSA to update occupational requirements data used in administering the Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs. The collected data will also advance the mission of the BLS by making possible a detailed analysis and expansion of occupational data from several BLS programs, including the National Compensation Survey (NCS), the Occupational Employment and Wage Statistics (OEWS) program [previously known as the Occupational Employment Statistics (OES) program], and the Occupational Safety and Health Statistics programs (OSHS), promoting the continued effective use of these data, and disseminating these data to a wider audience.

The ORS collects the following data to meet the needs of SSA's disability program:

- 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. These measures are comparable to measures in Appendix C of the [Selected Characteristics of Occupations](#) (SCO).
- 3) Environmental Conditions. 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, defined as the critical job function and key job tasks, to validate the reported requirements of work. These task lists are comparable to data identified in the Employment and Training Administration's (ETA's) O*NET Program.

Some data needed for the ORS are collected by NCS currently from its sample of establishments. These data are collected with the same methodology for ORS sample establishments that are not in the NCS sample. The general establishment data collected in the survey samples are the same for the 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.

Work leveling data is collected during the ORS as it is currently collected 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 are collected by BLS field economists. “Field economist” is the BLS title for those who collect data from respondents. To collect ORS data, field economists 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. During the pandemic, video conferencing is being used to replace on site interviews. Video conferencing will continue to be used as an alternative data collection method. Other communication media, such as faxes, mail, websites, and e-mail are used to assist the process, depending on the wishes of the respondents.

Field economists often initiate contact with companies through personnel or Human Resource staff, but may have multiple respondents within a company providing different information based on expertise. The goal is always to find the best data source while balancing response and burden concerns. Human Resource and management staff are familiar with the requirements of an occupation from the employee hiring and performance perspective. This helps ensure the answers reflect the establishment’s needs and not how a job has been adapted to a particular worker’s skills or personal style. During data collection, many respondents will either consult with supervisors or employees with the field economist present, or will obtain information from more knowledgeable staff and provide it to resolve particular questions.

Field economists do not rely on a scripted interview. Instead, they ask probing questions to get the information and conversational interviewing techniques are often used. 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 is not asked to complete the collection forms. The field economist requests the needed information and uses the collection forms as a note-taking device. General establishment and specific occupation information is then entered into a database by the field economist using a web-based interface. Field economists use the ORS collection system after the completion of the interview with the respondent.

ORS policy is to collect the data in whichever manner 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 collection training and quality assurance programs are in place to lessen any impact on data collection.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

SSA's regulations require five steps of sequential evaluation to determine whether an adult claimant qualifies for disability benefits. For almost 50 years, SSA has relied on the Department of Labor's (DOL) Dictionary of Occupational Titles (DOT) as the primary source of occupational information to make medical-vocational decisions. Although DOL did not design the DOT for SSA use, SSA incorporated many of the DOT's concepts and definitions into SSA's regulations and policy. The DOL stopped fully updating the DOT in 1991 and, in 1998, replaced it with the Occupational Information Network (O*NET). DOL developed O*NET as a career exploration tool, and it does not measure strength and physical requirements in a manner consistent with SSA's disability rules.

As occupations and their duties and responsibilities have changed in the last 30 years, the relevance of DOT-based information has declined. About half of the determinations and decisions SSA makes require current occupational information about work that exists in the national economy. SSA will use the occupational information collected through ORS to develop a new occupational information system to replace the outdated DOT in the disability determination process, as outlined in 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 [31 United States Code §§ 1535/FAR 17.5 of the Economy Act](#).

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

There are multiple stakeholders for the ORS occupational information, including the SSA and organizations involved in the disability community. These stakeholders have used BLS published data from past and current ORS collection for research, analysis and other purposes. In addition, occupational information from current and future collections will be used to update and improve the operation of SSA's disability programs, as described above. Specifically, the SSA will use ORS data to make medical-vocational decisions and determinations under its disability adjudication process, during which SSA must assess the functional impact of claimants' impairments and determine whether claimants can perform work in the national economy. This process is described by the SSA in the [Research and Statistics Note No. 2013-01](#). The BLS presents its work on the ORS to organizations such as the Vocational Evaluation and Career Assessment Professionals and the National Association of Disability Representatives (NADR) to raise awareness of the data and determine the specific needs of this stakeholder community.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

BLS field economists obtain data from respondents through personal interview, telephone, e-mail, fax, and web-site contacts. During the pandemic, video conferencing is being used to replace on-site interviews.

After the interview, BLS field economists enter collected data into a database. They use a web-based application, Compensation Information Entry and Review Application (CIERA), using an Oracle computer database system.

Some general information does not have to be collected from survey respondents as that data is available 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. 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. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item A.2 above.

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

Similar data available from the DOL Occupational Information Network (O*NET) does not measure strength and physical requirements in a manner consistent with SSA's disability rules.

5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The ORS sample is designed to provide occupational requirements 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. Respondents will not be asked to provide data more than once every five years for a sampled establishment, as described in Part B, Section 2a.

The aggregate collection burden on small establishments is significantly less than the burden on medium and large establishments. Establishment selection is performed using a systematic probability proportionate to size technique that uses employment as the measure of size. 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. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

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 programs.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances for this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years -- even if the collection-of-information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

BLS received four public comments on the Federal Register notice published in the Federal Register, 86 FR 7422, on January 28, 2021. Public comments were from one business within the vocational rehabilitation industry and three professional organizations. The comments received concerned the following areas: the ORS design and methodology, changes to the ORS data elements, collection methods, and the usability of published estimates. BLS received one set of comments on the notice published in the Federal Register, 86 FR 30334, on June 7, 2021. These were from one of the organizations that reiterated their earlier concerns.

BLS carefully evaluated all of the comments received from the public. This information request is for continued collection that includes years four and five of the current five-year collection sample (second wave). During any collection sample, BLS strives for consistency and limits changes that create breaks in measurement concepts. This approach maximizes the amount of data used in estimation and increases the likelihood of estimates meeting publication criteria. As

a result, no changes are planned for the ORS design or collected elements for the remainder of the second wave.

The current ORS collection was designed and tested to meet SSA's measurement objectives. BLS has begun consulting with SSA regarding changes for the third wave of the ORS, which is scheduled to begin collection in August of 2023. The measurement changes being discussed largely focus on cognitive elements: frequency of work being checked, problem solving, working with the general public, and verbal interactions. New measures related to task and work schedule changes are being explored. The public comments received on the Federal Register notices have been shared with SSA, and requests for changes to elements will be given consideration for a future ORS collection wave unless noted otherwise within this document. It is important to note that BLS must balance stakeholder needs with respondent burden. A single voluntary survey cannot capture the exhaustive list of dimensions that comprise an occupation.

Initial testing for third wave changes is being conducted under O.M.B # 1220-0141 by the BLS Office of Survey Methods Research (OSMR). BLS tests survey elements before introducing them into production collection. Clearance requests for testing revised elements were submitted to OMB in 2021. The testing is described in more detail in Part B, section 4a. The changes focus on new and revised questions designed to better meet the needs of SSA. Additional testing may be conducted under either the ORS or the OSMR clearance number. Production changes to collection will follow the standard notification under the ORS clearance number prior to the beginning of the third wave.

Regarding the general scope of published occupational estimates, BLS verifies each calculated estimate meets specified statistical reliability and confidentiality requirements. A Federal survey must balance the needs of maximum utility for data users against costs, including the burden placed on the respondent participating in a voluntary survey. Not all estimates will meet publication criteria with the current sample, and the coronavirus pandemic has affected response rates. BLS has increased the ORS sample size planned for collection from August 2021 through July 2022 to mitigate response issues due to the pandemic. The survey design will be reviewed for the third wave of ORS collection to support estimates SSA advises are most critical to disability adjudication and where other data sources are insufficient.

Responses to specific comments follow, grouped by category: sample design, methodology, data elements, collection forms, estimates, and other data sets.

SAMPLE DESIGN

One commenter asked whether the ORS was following the Occupational Employment and Wage Statistics (OEWS) [previously known as the Occupational Employment Statistics (OES) program] or the National Compensation Survey (NCS) methodology. ORS uses a unique methodology, as outlined in Supporting Statement B of this information collection request and the Handbook of Methods (HOM) available on the BLS website. The survey design maximizes the chance for publication of ORS estimates within Standard Occupational Classification (SOC) codes.

This commenter asked how well the ORS preselected SOC occupational sampling corresponded to existing employer jobs. The process for occupational selection is outlined in the Handbook of Methods and differs depending on establishment ownership. For private industry establishments, the ORS uses a prioritized list of SOC codes for each sampled establishment. A different occupational sampling method is used for State and local governments. BLS analyzed occupational selection for the two completed years of the current five-year design. For private industry where the preselected SOC selection method is expected, BLS field staff matched at least one preselected occupation to an establishment (employer) job in approximately 96% of collected establishments.

The commenter raised concerns the ORS data may not be usable because the DOT has 12,761 defined occupations while the SOC, which is also used by the O*Net, is based on broad groups of occupations. The ORS was developed to support SSA disability adjudication with the modern SOC taxonomy. While BLS cannot comment on SSA policies, SSA acknowledges there are significant differences between the SOC and DOT taxonomies. SSA has determined that updated regulations will be needed to adopt ORS as a reliable source of occupational information for disability adjudication.

METHODOLOGY

Two commenters repeated concerns that there are differences between the data collected from employers and the data that would be obtained by direct measurement and observation. BLS places a high value on the validity and reliability of its survey data. As described in Supporting Statement Part B Section 4b, BLS has recognized this concern and continues efforts to measure ORS data reliability and validity. BLS has conducted job observation tests and had planned incumbent testing prior to the pandemic. ORS procedures encourage field economists to observe the work informally when possible. Requiring formal observation as part of standard data collection in a voluntary survey is not feasible. Not all jobs are consistent such that a short duration observation will include all required tasks. The cognitive, physical, and environmental conditions would reflect only a snapshot from the observation period. Critical tasks may only occur on certain days or during seasonal periods depending on the nature of the job and industry. Additionally, BLS access to worksites places additional burden on respondents and is not always possible due to safety, security, privacy, and cost issues.

A commenter requested clarification on which version of the SOC is used in ORS. The current wave of ORS collection uses the 2018 SOC, as specified in the HOM. A notice was published on the ORS homepage of the public BLS website as well. The referenced NCS program uses both the 2010 and the 2018 SOC for benchmarking and weighting purposes, and the use of both has no bearing on the ORS.

There were two comments related to the calculation of Strength estimates, particularly the Sedentary level. The Strength levels in ORS are determined primarily by the amounts of weight lifted/carried within duration categories. Additionally, the Sitting and Standing/Walking durations are used to distinguish between Light and Sedentary levels. Push/Pull elements are not part of the formula and are published as unique estimates. Similarly, lift/carry weight categories not used in the strength formula are eligible to publish as individual estimates.

How BLS derives the Strength level is published in the ORS Calculation section of the [HOM](#) and there is a [Strength](#) fact sheet available on the ORS website. There was a reference error in the published HOM exhibit that has been corrected. Sedentary work is defined as work that does not meet any of the Lift/Carry Strength criteria and standing/walking occurs less than or equal to one-third of the workday. The information presented in exhibits 6 and 7 of the HOM cannot be combined in a way that is both clear and meets 508 compliance requirements.

DATA ELEMENTS

Commenters requested additions or changes to currently collected ORS data elements. BLS will not be changing the ORS elements for this collection wave. Requests for changes to elements will be given consideration for future collection waves, unless otherwise noted.

One commenter requested collection of Aptitudes, as well as levels for Reasoning, Mathematical, and Language Development, as outlined in the Handbook for Analyzing Jobs. The data from the Dictionary of Occupational Titles (DOT) and the methods outlined in the Revised Handbook for Analyzing Jobs (RHAJ) were reviewed during earlier ORS development. The currently collected ORS elements were developed and tested to meet SSA's measurement objectives. Aptitudes represent abilities of job incumbents to learn whereas ORS data collection focuses on the cognitive and physical requirements to perform core job tasks.

One commenter requested BLS collect data on the number of days a worker can be absent, or the amount of time that an employee can be off task, and still maintain substantial gainful employment. The ORS is designed to provide information regarding what is required to perform critical job functions of selected jobs and does not consider whether any specific job represents employment that is substantial or gainful. The currently collected elements were developed and tested to meet SSA's measurement objectives.

One commenter provided several suggestions for changing labels to ORS elements. The gross and fine manipulation labels were set based on original ORS testing. These labels yielded the most consistent initial interpretation of the physical demand being collected. In addition, these terms have been published in ORS materials and training for many years. Adjusting the labels can lead data users to believe definitions have changed. Because definitions are unchanged, no label changes are being made for the current collection wave.

One commenter discussed how individuals that “apply for Social Security disability benefits allege that they have a disability which impacts [that individual’s] ability to work” and that ORS does not have enough detail to determine job requirements. The commenter points to the lack of specific acuity measurements in ORS, using Visual Acuity as an example where the RHAJ defines more. The ORS includes three vision measures: Near Visual Acuity, Far Visual Acuity, and Peripheral Vision. These were determined based on what SSA determined was most critical for disability adjudication.

A commenter suggested adding repetition ranges to the duration ranges for Lift/Carry. Adding repetition to the Lift/Carry element would require testing to determine burden and collectability.

Collecting both dimensions in one category would add complexity since multiple items may be carried for lengths of time that would contradict the repetition categories. Creating a new category for repetition would reduce that complexity, however, it would increase the burden for collection. Based on these considerations and the need to balance the elements collected with respondent burden and SSA priorities, this request is not feasible.

A commenter requested the collection of duration for the Stooping physical demand separate from the Low Postures element. The collection of an overall duration for Low Postures and the incidence of specific required postures is based on the experience of earlier ORS data collection. Collecting duration for individual postures proved difficult from respondents and resulted in low response rates for duration in this element. Lifting from a low level is only one of the tasks where these postures are present and some tasks allow workers to choose posture based on personal preference. Based on prior collection and estimation experience, this change is not feasible as it could negatively impact data quality.

A commenter suggested replacing the incidence collection of “One/Both” extremity use in several physical demands with duration collection for dominant and other extremity use in those physical demands. While the suggested approach may align best with the particular data use, it would probably be very difficult to collect in a standardized survey based on prior ORS collection experience. "Both" is checked when any required task cannot be done with one arm/leg regardless of the duration. The suggestion would add considerable complexity to both collection and estimation for the seven impacted elements. Early testing of the ORS identified the current approach as the most efficient way to balance data users’ needs with respondent burden.

A commenter raised concerns about the way Pushing/Pulling factors are collected in the ORS. They mention that Pushing/Pulling was previously referenced as part of the Strength definition in the DOT. The Pushing/Pulling elements were developed during initial ORS testing as unique elements, and the existing documentation on the circumstances when Pushing/Pulling was used to determine strength levels in the DOT was unclear. SSA determined Strength in the ORS should be calculated based on the clear formula of Lift/Carry with Sit/Stand delineating Sedentary from Light work.

There is also concern that Pushing/Pulling is duplicating information already collected under other physical demands. In early testing, there was some overlap of physical demands, however this was refined and such overlap does not exist in the current ORS collection. Pushing/Pulling for Feet/Legs and Hands/Arms is collected in the ORS when physical exertion is required, either through force or repetition. Foot/Leg controls measure when smaller, more precise foot movements are required and upper leg muscles are not needed. Gross and Fine Manipulation similarly measure more detailed use of the hands.

COLLECTION FORMS

Two commenters interpreted additional survey collection forms included in this clearance, or updated data collection manuals published on the BLS public website, as indicating BLS made changes to the ORS data being captured. These materials are designed for use by BLS field

economists and changes reflect efforts by BLS to support efficient and consistent data collection. The manual was republished to correct typos and include concepts clarified in training sessions to ensure consistency of data collection and review. Collection forms are used by BLS field economists to collect data, not respondents, and new versions have been developed for electronic collection use by field economists. The newer forms allow efficient completion on screen using the duration scale, reducing the need for printing, and supporting increased telephone collection due to the pandemic. The original survey forms remain an option and provide a blank field for each element, giving field economists the flexibility to collect a duration using the duration scale, specific hours, or specific percentages of time based on the information collected. Regardless of the form and format in which the information is collected, it is slotted into the duration scale when entered in the data capture system. These entries are based on the duration relative to the job's work schedule, which is also captured, and do not represent fixed amounts of time.

Several suggestions for adding detail or reorganizing the form were provided by one commenter. These were evaluated based on whether they added needed clarity for BLS field economists, improved consistency across forms, and maintained consistency with the data capture system. Suggestions that met these three criteria are reflected on revised forms. The suggestion to reposition the Not Present selection for physical demands was not made because it does not align with the current data capture system and could lead to data entry errors.

ESTIMATES

All commenters raised concerns about the usability of the published estimates and that being unable to search across fields and categories does not meet their needs.

BLS welcomes the input on data user needs. These concerns have also been raised through outreach activities and information desk calls. The ORS does not provide occupational employment counts; however, it provides data users the ability to identify occupations that meet criteria for combinations of job requirements. BLS recognizes the limitations of obtaining job requirements through the various public query tools and Excel spreadsheet and explored providing summary information through occupational profiles, fact sheets, and tables in the News Release. However, these outputs do not meet the needs of users attempting to extract information for a variety of occupations with various job requirements. BLS values providing accurate, objective, relevant, timely, and accessible information that meets the needs of a diverse set of customers. BLS staff are currently working to improve the Excel spreadsheet to allow for additional filtering for job requirements and occupations of interest. Any instructions and information will be posted on the ORS homepage when available. In addition, BLS staff will continue to evaluate options for additional formats and outputs that will improve the ability to access, understand, and use available data. Information about these efforts will be shared on the ORS homepage and provide an opportunity for feedback.

One commenter requested that ORS report data reflecting industry as well as occupation. BLS understands data users may be interested in seeing more granular detail such as industry where the occupations were sampled. This type of estimate or metadata can be considered after the second wave collection is complete and planned estimates are released. Any estimates created must be validated and reviewed against publication standards before they are released. The

resources required to do this for industry level estimates during intermediate years do not exist, and it is uncertain how many estimates will meet publication criteria.

One commenter requested the publication of occupational tasks lists. Task data is collected during the interview to fully capture the requirements of jobs and used to support coding decisions. It is not intended nor designed for publication of task lists. BLS is exploring whether the task data could be captured and combined to produce meaningful task lists in future waves.

One commenter requested the publication of occupational requirements in relation to shift durations. ORS is not designed to produce estimates on shift durations. BLS recognizes the need for this information and based on this comment is exploring whether the daily work schedule hours already collected would be able to support a supplemental estimate.

Concerns about the difference in the number of unique occupations listed in the DOT and the number of unique occupations available under the SOC were raised in current comments as well as prior clearance requests.

Direct comparisons based on the number of occupations is flawed. The ORS is designed to produce outputs that meet defined reliability criteria and uses statistical methods to ensure the sample reflects the current economy industry and occupational mix. The coverage of the DOT reflects the historical economy and underrepresents the retail and service industry. It is dominated by production and trade occupations.

Among the ORS publication criteria are a minimum number of observations supporting the estimate. The classification system is standardized and variation of levels within a SOC for a given ORS element reflects the variety of job requirements collected. In contrast, the DOT did not apply consistent criteria to differentiate within a classification and ratings listed for a DOT occupation may be based only on one or two jobs. Data based on limited jobs may be sufficient when the occupation is homogenous, however, there is no standard that identifies where a very small number is appropriate.

OTHER DATA SETS

Two commenters provided several comments about the O*Net, the Occupational Outlook Handbook (OOH), and the OEWS program outputs. While these materials are produced by the Department of Labor, they are outside the control of the ORS program. In the material linked within the public comment, it appears the DOL agency responsible for maintaining the O*Net has determined it is not feasible to generate a crosswalk to the historical DOT structure for each subsequent SOC update. The BLS OOH provides a general composite description of jobs that is designed to provide basic information to job seekers and does contain a disclaimer that it should not be used for any legal purpose. The OEWS program produces wage and employment data that would be more appropriate for the commenter's purpose than the OOH publication. These current outputs, along with the ORS estimates, are all published using the SOC structure. This standardized classification system allows data users to combine Federal statistics to meet individual needs, while reducing the duplication of data collection and publication efforts.

Outside Consultation

BLS staff engaged in extensive consultation with staff of the Social Security Administration's Research, Demonstration, and Employment Support and Office of Disability Policy on all aspects of the survey. High level executive meetings are conducted quarterly between SSA and BLS. A program development plan is reviewed by SSA and BLS executives twice a year.

The ORS data has been presented and discussed at the BLS Data User's Advisory Committee meetings. BLS staff attended conferences to keep organizations informed about the latest developments in the ORS and to learn more about the needs of the stakeholder community. BLS staff presented ORS data to a variety of audiences including:

- Society for Advancing Business Editing and Writing (SABEW) in February 2019
- Chicago Data User's conference in August 2019
- North Carolina Rehabilitation Association in October 2019
- National Association of Disability Representatives (NADR) in November 2019
- University of Idaho students in December 2019
- Department of Labor's Employment and Training Administration in February 2020
- American Board of Vocational Experts (ABVE) in August 2020
- Boston Data User's conference in September 2020
- Philadelphia Data User's conference in September 2020
- Vocational Evaluation and Career Assessment Professionals (VECAP) in October 2020
- International Association of Rehabilitation Professionals (IARP) in October 2020

Summaries of research conducted by BLS staff and the outside research are available at www.bls.gov/ors/research/research-collection.htm.

9. Explain any decision to provide any payments or gifts to respondents, other than remuneration of contractors or grantees.

No payments or gifts will be provided to any respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The Confidential Information Protection and Statistical Efficiency Act (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 (44 U.S.C. 3572) and other applicable Federal laws, your responses will not be disclosed in identifiable form without your informed consent. Per the Federal Cybersecurity Enhancement Act of 2015, Federal information systems are protected from malicious activities through cybersecurity screening of transmitted data.

This statement appears on the private industry collection forms.

For the ORS program, the pledge of confidentiality is not extended to State and local government entities, unless specifically requested.

BLS policy on the confidential nature of respondent identifiable information (RII) states, “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. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Aside from the sensitivity attached to position description and working conditions, no sensitive questions are asked during the survey.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. General, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

Estimates of respondent burden are provided in this section for all activities associated with the ORS program. Minutes per response is based on initial collection testing and current interview duration averages. For the purposes of the discussion of respondent burden and BLS cost, the ORS is an initiation-only survey. Respondents will not be asked to provide data more than once every five years for a sampled establishment, as described in Part B, Section 2a. For an ORS establishment that is also a sample establishment in the NCS survey, the collection of establishment information, work leveling, and work schedule and the associated time are covered and charged under the OMB Clearance for the National Compensation Survey (OMB Control Number 1220-0164).

Broadly stated, both private industry and State/local government establishments in the ORS collection fall into the following three categories below:

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

Activity (1b) – Initiation of establishments in the ORS sample that 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. Approximately five percent of the sampled establishments will be re-contacted to confirm the accuracy of coding for selected data elements

Activity (3) – Additional testing of occupational requirement collection.

Estimates of net respondent burden associated with these collection activities in FY 2021, FY 2022, FY 2023, and FY 2024 are broken out by affected sectors (private sector, State and local governments) and provided on the following pages. Collection of each sample occurs over multiple fiscal years; therefore, the total number of units collected during each fiscal year reported in the tables below may differ from the stated sample numbers provided in Part B, Section 1b.

Private Sector Establishments

Table 1a. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for September FY 2021

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	516	120	1032.0
Activity 1a Initiation of ORS (non-response)	516	5	43.0
Activity 1b Initiation of ORS NCS overlap establishments	30	66	33.0
Activity 2 Re-interview for quality assurance activities	26	15	6.5
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2021 TOTALS	1088		1114.5

Table 1b. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2022

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	6197	120	12,394
Activity 1a Initiation of ORS (non-response)	6197	5	516.4
Activity 1b Initiation of ORS NCS overlap establishments	357	66	392.7
Activity 2 Re-interview for quality assurance activities	310	15	77.5
Activity 3 Testing of occupational requirements collection	250	60	250.0
FY 2022 TOTALS	13311		13630.6

Table 1c. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	8427	120	16854.0
Activity 1a Initiation of ORS (non-response)	3612	5	301.0
Activity 1b Initiation of ORS NCS overlap establishments	357	66	392.7
Activity 2 Re-interview for quality assurance activities	421	15	105.3
Activity 3 Testing of occupational requirements collection	800	60	800.0
FY 2023 TOTALS	13617	--	18453.0

Table 1d. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	5226	120	10452.0
Activity 1a Initiation of ORS (non-response)	2239	5	186.6
Activity 1b Initiation of ORS NCS overlap establishments	327	66	359.7
Activity 2 Re-interview for quality assurance activities	261	15	65.3
Activity 3 Testing of occupational requirements collection	800	60	800.0
FY 2024 TOTALS	8853	--	11863.5

State and Local Government Establishments

Table 2a. Anticipated State and local government sample burden for the Occupational Requirements Survey by activity type for September FY 2021

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	163	120	326.0
Activity 1a Initiation of ORS (non-response)	18	5	1.5
Activity 1b Initiation of ORS NCS overlap establishments	7	66	7.7
Activity 2 Re-interview for quality assurance activities	8	15	2.0
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2021 TOTALS	196		337.2

Table 2b. Anticipated State and local government sample burden for the Occupational Requirements Survey by activity type for FY 2022

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	1961	120	3922.0
Activity 1a Initiation of ORS (non-response)	218	5	18.2
Activity 1b Initiation of ORS NCS overlaps establishments	72	66	79.2
Activity 2 Re-interview for quality assurance activities	98	15	24.5
Activity 3 Testing of occupational requirements collection	50	60	50.0
FY 2022 TOTALS	2399	--	4093.9

Table 2c. Anticipated State and local government sample burden for the Occupational Requirements Survey by activity type for FY 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	1955	120	3910.0
Activity 1a Initiation of ORS (non-response)	170	5	14.2
Activity 1b Initiation of ORS NCS overlap establishments	63	66	69.3
Activity 2 Re-interview for quality assurance activities	98	15	24.5
Activity 3 Testing of occupational requirements collection	200	60	200.0
FY 2023 TOTALS	2486	--	4218.0

Table 2d. Anticipated State and local government sample burden for the Occupational Requirements Survey by activity type for FY 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	1212	120	2424.0
Activity 1a Initiation of ORS (non-response)	105	5	8.8
Activity 1b Initiation of ORS NCS overlap establishments	58	66	63.8
Activity 2 Re-interview for quality assurance activities	61	15	15.3
Activity 3 Testing of occupational requirements collection	200	60	200.0
FY 2024 TOTALS	1636		2711.8

Total Anticipated Burden – Private Sector and State and Local Government

Table 3. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2021 – September 2021

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	679	120	1358.0
Activity 1a Initiation of ORS (non-response)	534	5	44.5
Activity 1b Initiation of ORS NCS overlap establishments	37	66	40.7
Activity 2 Re-interview for quality assurance activities	34	15	8.5
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2021 TOTALS	1284		1451.7

Table 4. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2022 - October 2021 to September 2022

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	8158	120	16316.0
Activity 1a Initiation of ORS (non-response)	6415	5	534.6
Activity 1b Initiation of ORS NCS overlap establishments	429	66	471.9
Activity 2 Re-interview for quality assurance activities	408	15	102.0
Activity 3 Testing of occupational requirements collection	300	60	300.0
FY 2022 TOTALS	15710		17724.5

Table 5. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2023 - October 2022 to September 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	10382	120	20764.0
Activity 1a Initiation of ORS (non-response)	3782	5	315.2
Activity 1b Initiation of ORS NCS overlap establishments	420	66	462.0
Activity 2 Re-interview for quality assurance activities	519	15	129.8
Activity 3 Testing of occupational requirements collection	1000	60	1000.0
FY 2023 TOTALS	16103		22671.0

Table 6. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2024 - October 2023 to August 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1a Initiation of ORS	6438	120	12876.0
Activity 1a Initiation of ORS (non-response)	2344	5	195.3
Activity 1b Initiation of ORS NCS overlap establishments	385	66	423.5
Activity 2 Re-interview for quality assurance activities	322	15	80.5
Activity 3 Testing of occupational requirements collection	1000	60	1000.0
FY 2024 TOTALS	10489		14575.3

Overview of ORS 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 database to be the official copy of the establishment data for survey purposes.

Table 7. Functions and uses of ORS forms

Information Collected	Purpose/Activity	Form used	Time
General establishment information, work level of occupation, and work schedule; records check of these data	ORS initiation (1a)	Establishment, work level, and schedule collection form (ORS Form 15-1G; ORS Form 15-1P)	54 minutes
Initiation collection of vocational preparation, cognitive elements, physical demands, environmental conditions, and job tasks; records check of this collection	ORS initiation (1a) ORS initiation (1b)	Occupation requirements (ORS Form 4PPD-4P) Occupation requirements (ORS Form 4PPD-4G) Occupation requirements (ORS Form 4 PPD-4GF) Occupation requirements (ORS Form 4 PPD-4PF) Occupation requirements (ORS Form 4 PPD-4GAF) Occupation requirements (ORS Form 4 PPD-4PAF)	66 minutes

The tables below summarize the data, including figures on the actual number of respondents to be contacted each fiscal year.

Table 8. 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 2021	1088	1	1088	61.46	1114.5
FY 2022	13311	1	13311	61.44	13630.6
FY 2023	13617	1	13617	81.31	18453.0
FY 2024	8853	1	8853	80.40	11863.5
Overall Average	9217	1	9217	71.1525	11265.0

Table 9. 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 2021	196	1	196	103.22	337.2
FY 2022	2399	1	2399	102.39	4093.9
FY 2023	2486	1	2486	101.80	4218.0
FY 2024	1636	1	1636	99.45	2711.8
Overall Average	1679	1	1679	101.7150	2840.0

Burden Costs

Based on past experience, 70 percent of reporting time comes from professional and related workers, and the remaining 30 percent comes from office and administrative support workers. Table 10a and 10b below summarize number of respondents to be contacted each year and estimates of Total Burden Costs.

Table 10a. Estimated respondent cost and distribution

Type of Respondents	Average Hourly Rate	Historical Respondent Percentage
Professional and related specialty	\$58.04	70
Office and administrative support	\$28.90	30
Weighted Average Hourly Wage Rate	\$49.30	

Hourly costs of pay and benefits measured by the ECEC data series for Civilian workers in June 2020.

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

Table 10b. Anticipated total sample average responses and burden by Fiscal Year

Fiscal Year	Respondents	Total # of responses*	Average minutes per response	Total hours	Average Hourly Wage Rate	Total Burden Costs
FY 2021	1284	1284	68	1452	\$49.30	\$71,583.6
FY 2022	15710	15710	68	17725	\$49.30	\$873,842.5
FY 2023	16103	16103	84	22671	\$49.30	\$1,117,680.3
FY 2024	10489	10489	83	14575	\$49.30	\$718,547.5
Total Average	10896	10896		14105		\$695,413.5

*Initiations, quality assurance contacts, and collection testing

Note: The sum of individual items may not equal totals due to rounding.

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start up cost component (annualized over its expected useful life); and (b) a total operation and maintenance and purchase of service component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

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. Provide estimates of the annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 into a single table.

The ORS survey is part of the Interagency Agreements between BLS and SSA. The estimated cost of the agreement and survey is \$35 million for FY 2021.

15. Explain the reasons for any program changes or adjustments.

BLS is seeking approval to increase the ORS sample size for Fiscal Years 2022 and 2023 to mitigate against the impacts of pandemic related non-response on survey estimates. The recent extension of 1220-0189, was approved on August 27, 2021, with burden hours of 12,268. This was a decrease in burden hours from the prior collection approval of 20,948 hours, primarily due to reflecting the lower burden for non-responding establishments. The most recent approved request included an increase in the sample size only for the group collected August 2021 through July 2022.

To ensure sufficient data are collected to support final ORS estimates, BLS is now seeking approval to increase the ORS sample size for the group collected August 2022 through July 2023, bringing the burden hours to 14,106.

16. For collections of information whose results will be published, outline plans for tabulations, and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The ORS data collected are to be published annually, as an ongoing annual survey. Preliminary estimates are published each year, no later than the second quarter of the next fiscal year. Estimates are considered preliminary as data from each sample group will be added to the previously collected data in order to publish the latest preliminary estimates for the second wave. Final estimates for the second wave will be published no later than the second quarter of FY 2024. Information about the next data release is available on the www.bls.gov/ors website.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The BLS requests that the expiration date is not printed on ORS show cards, the ORS information sheet, and the Respondent Reference Guide. This will allow copies of the materials to be retained and used instead of discarded when an expiration date is met.

18. Explain each exception to the certification statement.

There are no exceptions to the certification statement.