SSA's Challenge:
The DOT

Inaugural Meeting

Occupational Information Development Advisory Panel

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Excerpt of the Definition of Disability Social Security Act Section 223(d)(2)

An individual shall be determined to be under a disability only if his physical or mental impairment or impairments are of such severity that he is not only unable to do his previous work but cannot, considering his age, education, and work experience, engage in any other kind of substantial gainful work which exists in the national economy, regardless of whether such work exists in the immediate area in which he lives, or whether a specific job vacancy exists for him, or whether he would be hired if he applied for work. For purposes of the preceding sentence (with respect to any individual), "work which exists in the national economy" means work which exists in significant numbers either in the region where such individual lives or in several regions of the country.

DEFINITION OF DISABILITY: What changed in 1967?

We must consider whether the individual

- **is not only unable to do his previous work,**

- **but cannot considering his age, education, and work experience, engage in any other kind of substantial gainful activity which exists in the national economy….**

Act specifies:

"Work which exists in the national economy" means **work which exists in "significant numbers."**

What Compels Us
To Use the DOT?

SSA's vocational assessment process must:

- Reflect work requirements.

- Reflect national existence of work.

- Meet burden and be legally defensible.

We take administrative notice of several occupational sources which may be used to meet our burden. The DOT comes closest to meeting all criteria.

Sequential Evaluation Process

- **Step 1**: Is the individual currently working and performing "substantial gainful activity" (SGA)?
- **Step 2**: Does the individual have an impairment that is "severe" and meets the duration requirement?
- **Step 3**: Does the individual's impairment(s) meet or equal the severity requirements of a listing in the Listing of Impairments?
- **Step 4**: Is the individual still able to do past work given his/her residual functional capacity (RFC)?
- **Step 5**: Is the individual able to do other work given his/her RFC, age, education, and work experience?

Over 50% of all initial disability claims require vocational review-- either at step 4 or at both steps 4 and 5
(SSA Office of Disability Programs, Administrative Data FY 2007)

Primary Source of Job Data

SSA uses the Dictionary of Occupational Titles (DOT) and its companion volumes, Selected Characteristics of Occupations (SCO), as its primary source of national occupational information in its disability programs

About the DOT

- Standardized classification of occupations created by the U.S. Employment Service, Department of Labor (DOL) to match job seekers to jobs from 1939 to late 1990's

- DOL published revisions of the DOT periodically with the last major revision in 1977 and final lesser revisions in early 1990's.

- Starting in 1966, SSA - DOL interagency agreement to gather additional data to meet SSA needs: Selected Characteristics of Occupations

Policy Built Around the DOT

- Medical-Vocational Guidelines (grid rules), published 1978, based on DOT definitions.

- Administrative notice of reliable information, including DOT

- Physical RFC based on DOT measures for physical job demands

DOT: The Bridge Between Residual Functional Capacity and the Demands of Work
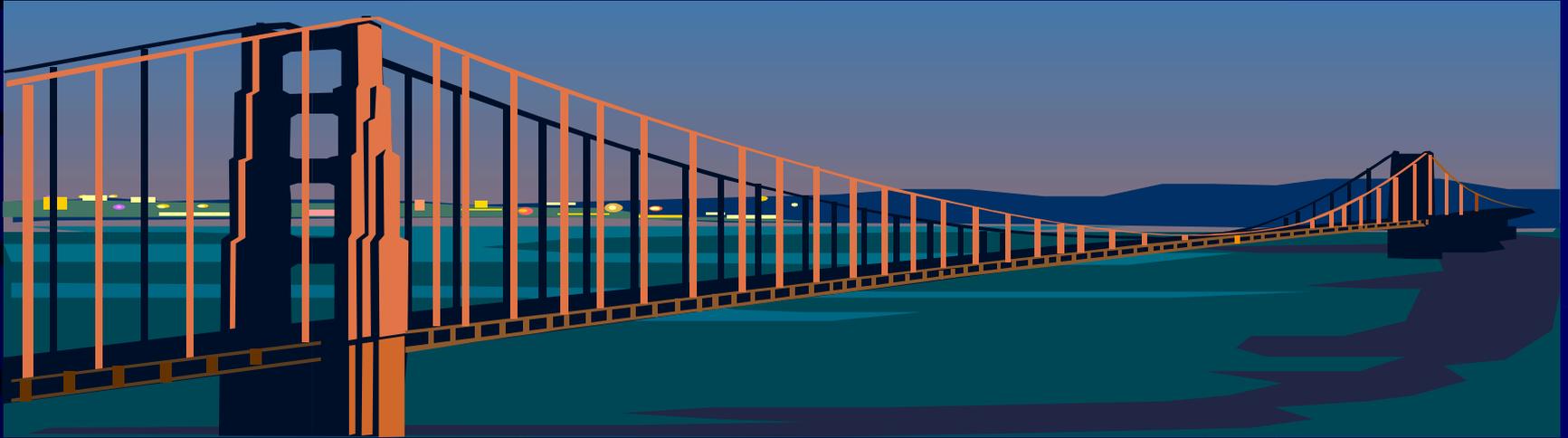
- Two sides of one equation:

  Person's Function <<------>> Demands of Work

- Residual Functional Capacity (RFC): What an individual can do despite his/her impairments.

- DOT: Description of job with ratings for skills and physical demands of work

- DOT: Bridge that allows SSA to compare an individual's RFC with the demands of work in the national economy.

Importance of the DOT

- Why we are here today.
- Sharing our background work, analyses, and methods & plans for moving forward
- Roadmap to orient us
- Presentations to provide context and background