

**SUPPORTING STATEMENT FOR
THE OCCUPATIONAL REQUIREMENTS SURVEY**

OMB CONTROL NO. 1220-0189

This clearance request is classified as a 30-day revision.

The BLS is amending this currently approved clearance to include two changes to the Occupational Requirements Survey (ORS):

- **An extension to the collection and processing time used to publish final ORS estimates. Beginning with the current collection wave, which began collection in August 2023, the BLS will distribute samples across a longer period of time. See Part B for extension details.**
- **The elimination of data elements pertaining to job work levels beginning August 2025 with the collection start of the next ORS sample. See the Overview section for more details.**

Item 12 has been updated to reflect the new burden estimates and a detailed list of changes is provided in item 15 below.

Item 2 describes several changes to survey questions and materials that were made to increase survey efficiency and improve estimates. The sample size of the ORS was increased to mitigate the impact of non-response on survey estimates and ensure sufficient data are collected to support the final ORS estimates. Part B items 1b and 4a have been updated to reflect sample size changes and current testing and analysis.

Overview

This request is for approval of the Occupational Requirements Survey (ORS) 1220-0189. The Bureau of Labor Statistics (BLS) conducts the ORS at the request of the Social Security Administration (SSA). The ORS is a national design survey, with private and government units sampled annually. This clearance package covers three years of collection, starting in 2023 and ending in 2026. The data elements have been evaluated by both the BLS and the SSA, and the sample design has been thoroughly evaluated by the 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, 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 SSA’s occupational information needs:

1. Education, Training, and Experience. An indicator of “time to proficiency,” defined as the minimum amount of preparation time required by a typical worker to learn the techniques, acquire the information, and develop the aptitude needed for basic performance in a specific job. This indicator is comparable to the Specific Vocational Preparation (SVP) used in the [Dictionary of Occupational Titles](#) (DOT).
2. Physical Demands. 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. Mental and Cognitive Demands. These measures include work setting, review, and pace, in addition to personal contacts.

The ORS also collects occupational task lists to supplement reported data. Occupational task lists are defined as the critical job function and key job tasks and are used to validate the reported requirements of work. These task lists are comparable to data identified in the Employment and Training Administration's (ETA) Occupational Information Network (O*NET) Program. Note: Beginning in August 2025 with the introduction of a new sample group, the ORS will no longer collect work level information¹ on jobs from respondents. This reduction will decrease burden on respondents.

All ORS data elements are collected by the BLS field economists. “Field economist” is the BLS title for those who collect data from respondents. To collect the 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. Video conferencing is an available data collection method and 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 establishments (private industry or state and local governments) through personnel or human resource staff and may have multiple respondents within an establishment 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 job requirements from a 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.

¹ As outlined in the [Guide for Evaluating Your Firm’s Jobs and Pay](#), each sampled job is evaluated to determine the work level of its duties and responsibilities across four factors (knowledge, job controls and complexity, contacts, and physical environment), which is identical to that which is collected under the NCS. Each factor has specific point values reflecting increasing duties and responsibilities and are totaled to determine the overall work level for a job.

Field economists do not rely on a scripted interview. Instead, field economists ask probing questions to gather information, and conversational interviewing techniques are often employed. Field economists might ask questions in different ways to different respondents. For the ORS data collection, scripting an interview that covers most situations would be very difficult.

For the ORS data 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. Following the collection interview, the field economist enters general establishment and specific job information into databases using web-based interfaces.

The 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 the ORS survey procedures and data entry requirements. This approach could cause some non-sampling error, but collection training and quality assurance programs are in place to lessen any errors or impact from this method of 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.

The Social Security Act defines disability as the inability to engage in any substantial gainful activity because of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months. The SSA's adjudicators follow a five-step sequential evaluation process, as defined in the SSA's regulations, to determine whether adult claimants are entitled to or eligible for disability benefits. To determine whether a claimant meets the definition of disability, the SSA's adjudicators often need to consider whether the claimant is capable of performing either their past relevant work or other work that exists in significant numbers in the national economy (steps four and five of the sequential evaluation process). Therefore, the SSA requires occupational information about a claimant's past work and other work that exists in the national economy to determine whether a claimant can work despite their impairment(s). Adjudicators decide many disability claims at steps four and five of the sequential evaluation process.

The SSA currently uses the Department of Labor's (DOL) Dictionary of Occupational Titles (DOT) as the primary source of occupational information to make determinations and decisions at steps four and five of the sequential evaluation process. DOL stopped updating the DOT in 1991 and replaced it with the O*NET, a system that was developed as a career exploration tool. Because O*NET does not measure strength and physical requirements in the way that the DOT does and SSA disability rules require, it is not an adequate replacement for the DOT in the SSA's disability adjudication process.

The 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 the SSA's disability programs, as described above. Specifically, the SSA will use the ORS data to make medical-vocational decisions and determinations under its disability adjudication process, during which the 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 International Association of Rehabilitation Professionals (IARP) to raise awareness of the data and determine the specific needs of this stakeholder community.

With the currently approved clearance, several changes were implemented. These changes, as outlined below, are based on the results of testing and the needs of the SSA. Testing included focus groups, a structured cognitive test, and a field test as detailed in Part B, Attachment 20. The changes were made to increase survey efficiency and improve estimates. The forms and respondent materials used for the ORS collection were updated to be more user friendly and reflect the following changes:

- Removed the separate question capturing time spent using a traditional keyboard. The time spent keyboarding will now be captured as fine manipulation.
- Removed the question measuring the requirement to hear and understand other sounds.
- Revised the frequency scale for work checked by a supervisor or lead worker.
- Removed the question measuring problem-solving.
- Removed the question measuring the requirement for verbal, work-related interactions.
- Removed the question measuring the requirement to work with the general public.
- Added a question measuring the frequency of verbal interactions with individuals internal to the organization, including co-workers and supervisors.
- Added a question measuring the frequency of verbal interactions with the general public or individuals external to the organization.
- Added a question measuring whether workers are required to work in a setting where contact with a member of the general public is likely to occur.
- Added a question measuring the requirement to adapt to work schedule variability.

The following changes were also made to ORS survey measurements to improve consistency, and reduce collection and review burden:

- Combined licenses and certifications into one credential category.
- Combined associates and vocational associates into one minimum education category.
- Combined high school and vocational high school into one minimum education category.
- Added a separate category for apprenticeships.

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, video conferencing, telephone, e-mail, fax, and website contacts.

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. Respondent contact information is entered into another web-based application.

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.

A limited number of establishments are in both the ORS and NCS samples. Previously the BLS coordinated collection between the ORS and the NCS in these cases of sample overlap for the portion of information needed by both surveys: job selection and basic job information. Coordinated collection will no longer be pursued due to reorganization of field resources aimed at creating expertise and specialization in data collection. Field economists are now dedicated wholly to one survey (the NCS or the ORS). The benefits of survey specialization greatly outweighed the much more limited benefits of coordinated collection for these limited cases of shared data. Specialization in survey data collection ensures the quality and efficiencies in the overall collection of the ORS nationwide, especially during this era of rising non-response.

Similar data available from the DOL's O*NET does not measure strength and physical requirements in a manner consistent with the SSA's disability rules and therefore is not suitable to use in SSA's disability adjudication process.

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 the 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 SSA, 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 SSA's 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 confidentially 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 publications 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 XX comments on the Federal Register notice published in the Federal Register, XX FR XXXX on December XX, 2024. This clearance request is classified as a 30-day revision for continued collection of years one, two, and three of a multi-year sample design.

BLS received three public comments on the Federal Register notice published in the Federal Register, 87 FR 77640 on December 19, 2022. BLS received nine public comments (two of which were out of scope) on the Federal Register notice published in the Federal Register, 88 FR 17871, on March 24, 2023. The comments received concerned the following areas: the ORS design and methodology, data elements, administrative costs, estimates, and the use of the ORS data.

BLS carefully evaluated all received comments. The changes made for the third wave of the ORS were a result of public input, the SSA needs, and extensive survey testing.

The current ORS collection was designed and tested to meet the SSA's measurement objectives. BLS consulted with the SSA regarding the third wave changes made to the ORS to increase survey efficiency and improve estimates. The public comments received on this Federal Register notice have been shared with the SSA, and requests for changes to elements have been given consideration. It is important to note that the BLS must balance stakeholder needs with

respondent burden. A single voluntary survey cannot capture the exhaustive list of dimensions that comprise an occupation.

SAMPLE DESIGN

One commenter requested that unskilled occupations, SVP 1 (short demonstration only) and SVP 2 (beyond short demonstration through one month) requirements, be the focus of the sample design. For the ORS third wave, the sample design was changed to improve the likelihood of publishing data for occupations that the SSA has designated as priority for their disability adjudication purposes. The SSA's priority occupations comprise occupations that the SSA identified as having at least 25,000 workers nationally with a maximum high school education required and with low SVP requirements.

Several commenters requested descriptive statistics about survey response by categories including six-digit Standard Occupational Classification (SOC) groups, four-digit North American Industry Classification System (NAICS) industries, geographic locations, and respondent types. Part B and the BLS Handbook of Methods (HOM) describes the survey design in terms of sample size and sample allocation categories (establishment ownership, occupations, industries, and census region). Descriptive statistics about survey response are provided at aggregated levels in the Technical Note of the Economic News Releases for the ORS. The descriptive statistics provided include the total number of reporting establishments by ownership (private industry or state and local government) and the total number of occupational observations. The BLS will investigate the possibility of providing additional descriptive statistics about survey response.

One commenter questioned the period of collection for the proposed third wave and the period covered under this clearance request. As described in Part B, collection of the third wave of the ORS using a five-year sample design began in August 2023 and was expected to be complete in July 2028. This corresponds to starting in FY2023 and ending in FY2028. **Note: With this 30-day revision request, the BLS is extending the wave production time, therefore data collection will be completed in 2031 with final estimates expected to be published in 2032. See Part B for complete details of the extension to the production timeline.**

Clearances are granted for a maximum of three years. The current clearance request covers the first three years of the wave starting in August 2023 and ending in July 2026. A new clearance request must be submitted in FY2026 for collection of additional years of the third wave sample.

Four commenters expressed concern about the occupational classification used in ORS. The ORS uses the SOC system, which is the federal statistical standard used by federal agencies to classify workers into occupational categories for the purpose of collecting, calculating, or disseminating data.

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

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 a historical economy such that a given industry may be over or underrepresented as compared to the current economy.

METHODOLOGY

Two commenters expressed concern about the quality of the ORS data. The BLS is a federal principal statistical agency and embraces professional and operational standards designed to ensure the quality, integrity, and credibility of its outputs. As detailed in Part B, research and testing of data reliability and validating the ORS elements began in FY2014 and is on-going.

The BLS verifies each calculated estimate meets specified statistical reliability and confidentiality requirements. Estimates that do not meet those requirements are not published. Reliability of the ORS estimates are also addressed in the BLS HOM. The BLS values providing accurate, objective, relevant, timely, and accessible information that meets the needs of a diverse set of customers and will continue its efforts to meet those needs.

One commenter had concerns with the data reported for two-digit SOC codes and noted that data at the two-digit level seems to be assuming equal distribution across all detailed SOC codes reported. The BLS HOM outlines survey methodology to assist data users in evaluating the suitability of the statistics for their needs. The ORS Calculation section of the HOM provides the formulas for calculating all estimates, including estimates for major (two-digit) occupational groups. In the formulas, the final sampled job weight ensures that each sampled job used in estimation represents the appropriate employment from the sampling frame. Data collected for all detailed (six-digit) occupations contribute to estimates for their major occupational group even if estimates for the detailed occupation are not published. The Calculation section also specifically details how the ORS uses benchmarking to adjust the weight of each establishment in the survey to match the most current distribution of employment by several establishment and occupational characteristics. The benchmarking process updates the initial employment weights, assigned during sampling, by current employment. Benchmarking ensures that survey estimates reflect the most current employment distribution by industry, employment size, geographic area, and major occupational group.

The methods outlined in the recent factsheet on calculating occupational employment using the ORS and the OEWS data can be applied to any level of SOC aggregation (All Worker, two-digit, and six-digit).

Five commenters had concerns about the professional background and skill set of persons collecting the ORS data. The BLS field economists are highly trained professionals. They are trained in interview methodology to obtain information from establishments on a voluntary survey basis, how to perceive the attentiveness of the response to questions, and how to evaluate the data collected to determine when additional information is needed or conflicting information is reported. In respect to the ORS collection, staff are provided classroom conceptual training and extensive on-the-job training on the specific and wide-ranging concepts collected and

analyzed. Senior field economists have been collecting data throughout the ORS development and have a sound understanding of the data elements. In addition to training, the BLS uses a quality assurance program to ensure program accuracy and consistency. Calibration activities are conducted to improve consistency and reliability across field economists. Work done by all staff is reviewed for accuracy and consistency of collection. The BLS also randomly re-contacts establishments and a second field economist verifies selected data.

Five commenters observed concerns regarding current survey methods suggesting that onsite job analysis and observation is preferable to collecting data from employers. The BLS collects information from occupational experts at the establishments in the survey. These respondents include human resources professionals, supervisors, managers, owners, health and safety professionals, and other establishment officials familiar with the selected jobs. Field economists screen potential respondents for an understanding of the surveyed jobs sometimes interviewing multiple respondents at a single establishment to ensure the most reliable data. Professional economists utilize various means to validate data through the interview process. Field economists conduct the interviews by visiting the establishment or by video conferencing and telephone. Other communication media, such as e-mail, mail, and faxes are used to assist the process, depending on the wishes of the respondents.

Federal surveys must balance the needs of data users against the burden placed on respondents participating in a voluntary survey. The BLS places a high value on the validity and reliability of its survey data. As described in Part B, the BLS has recognized this concern and continues efforts to measure the ORS data reliability and validity. The BLS has conducted observation tests to ensure the validity of the interview collection methodology. Additional planned job incumbent testing was postponed due to the pandemic. The ORS procedures encourage field economists to observe the work informally when possible. Requiring formal observation, as part of standard data collection in a voluntary statistical survey, is not feasible. Further, a short duration observation may not include all required tasks. The cognitive, physical, and environmental conditions would reflect only a brief point in time from the observation period. Critical tasks may only occur at certain times or during seasonal periods depending on the nature of the job and industry. Additionally, the BLS access to worksites places additional burden on respondents and is not always possible due to safety, security, privacy, and cost issues. An increase in remote work also makes formal observation challenging.

One commenter recommended the use of electronic data reporting to ease collection burden for the BLS with the caveat that an electronic system would need thorough testing to ensure ease of use and submission of accurate data. The BLS is currently undertaking a BLS-wide initiative looking at collecting survey data electronically because this method offers opportunities for improved data quality and timeliness in both data collection and reporting and easing respondent burden.

Three commenters expressed concern about data inconsistencies and definitional changes in the ORS collection manual. To ensure consistency, there have been no significant definitional changes to the ORS concepts or elements during the second collection wave. The ORS collection manual will be updated as needed within a collection wave to clarify concepts or address

questions that have arisen during training, collection, and data review. The collection manual will be updated to incorporate third wave changes.

One commenter asked whether BLS field economists would replace vocational experts in disability claimant hearings. The BLS collects and supplies data to the SSA but is not involved in the adjudication process.

One commenter expressed concerns about ORS stakeholder input. The BLS has worked closely with stakeholders to develop the ORS. As detailed in Part A, item 8, Outside Consultation, BLS continues to engage and value stakeholder input through outside consultation and the ORS public information line.

One commenter suggested using private job analysts to do onsite job observations to supplement current ORS data collection efforts. BLS understands stakeholders' concerns regarding data collection and continues to evaluate how to improve the ORS.

Several commenters had concerns regarding the average amount of time field economists spend collecting ORS data from respondents. As stated in Part A, respondent burden calculations assume field economists spend an average of 66 minutes collecting data per establishment. Actual interview time can vary by establishment time constraints, occupations, number of respondents, and other factors. Professional economists utilize conversational interviewing techniques, which allow for efficiencies collecting multiple data elements based on respondent answers and the collection of the highest quality and complete data.

DATA ELEMENTS

One commenter had concerns regarding the pushing and pulling elements of the ORS. Pushing/pulling is a measure of exerting force on an object, and the exertion must meet the threshold established for the ORS. As indicated in Appendix A in the HOM, the ORS does measure and publish estimates for pushing and pulling.

ADMINISTRATIVE COSTS

Four commenters raised concerns about the administrative costs of the ORS and resulting estimates. Administrative costs thus far may be grouped into three primary activities: initial survey development and testing from October 2012 – September 2015, first wave collection and estimates from September 2015 – February 2019, and second wave collection and estimates from September 2018 – second quarter of FY 2024. First wave estimates were published after the start of second wave collection. Survey design changes have been incorporated following each of these primary activities to improve methodology, transition to updated classification systems, and revise data collection elements to meet the SSA's disability program needs. Survey design changes are made in consultation with the SSA. The lifecycle cost for the ORS second wave is

estimated at about \$160 million.¹ The SSA plans to continue funding the ORS on an ongoing basis to ensure that the occupational data remain relevant and up to date. Based on a 2016 study about the dynamics of occupational change and the shelf life of occupational data, the SSA decided to update occupational data every five years. The BLS incorporated that decision into the survey design beginning with the second wave. **Note: With this 30-day revision request, the BLS is extending the wave production time, therefore data collection will be completed in 2031 with final estimates expected to be published in 2032. This change allows the ORS to continue to efficiently publish statistically sound occupational estimates at reduced annual costs. See Part B for wave details.**

The SSA intends to use the ORS data, along with specified information from other reliable sources of occupational information to create the Occupational Information System (OIS). The OIS will classify occupations using the SOC system and include data elements relating to requirements of work, which the SSA needs for disability adjudication.

ORS ESTIMATES

One commenter suggested publishing occupational information for unskilled work separately from the overall occupation estimates. The BLS publishes occupational estimates measuring SVP, which is defined in the BLS HOM as the amount of preparation time required for the worker to develop the skills needed to perform the job. SVP is measured by 9 levels, and SVP levels 1 and 2 are generally associated with unskilled work.

The BLS provides data users occupational information and the ability to identify occupations that meet criteria for combinations of job requirements including SVP levels. The BLS recently published “Using Pivot Tables to compare and analyze multiple occupational requirements”² which guides data users in searching the dataset for multiple occupational requirements. The BLS will continue to assess approaches to better meet the specific data user needs expressed.

Four commenters expressed concern about the completeness of ORS estimates. The ORS involved a [prior] five-year design with preliminary interim results published on an annual basis and final estimates published in the fifth year. Note: Final second wave ORS estimates were published on February 8, 2024.

The ORS uses the 2018 SOC system to classify jobs and publish estimates for occupations to the six-digit level. Of the 867 six-digit detailed occupations in the 2018 SOC system, 844 are in-scope for the ORS. As noted in Part B, the goal of the ORS is to generate estimates for as many in-scope detailed (six-digit) occupations as possible, given the sample size and the BLS requirement to protect respondent confidentiality and produce accurate estimates. Additional estimates for aggregate occupational groups (two-digit) and at the “all worker” level are also generated, when available.

¹ Note: Final survey production lifecycle costs for the ORS second wave were \$153 million.

² ORS Factsheet, “Using Pivot Tables to compare and analyze multiple occupational requirements,” <https://www.bls.gov/ors/factsheet/pivot-table-guide.htm>

Individual ORS estimates may be withheld from publication for a number of reasons, including failure to meet the BLS quality standards or the need to protect the confidentiality of the survey respondents. In order to further ensure confidentiality, the BLS is not able to provide the specific reason that an estimate was not released. If no individual ORS estimates can be published for a detailed (six-digit) occupation for confidentiality reasons, the occupation will not be shown in published outputs. However, data collected for these occupations will contribute to ORS estimates for the appropriate occupational group (two-digit) and "all workers" aggregates.

The completeness of ORS estimates can be evaluated using two broad categories: "breadth" and "depth." "Breadth" refers to the number of detailed occupations with published estimates and "depth" refers to the robustness of estimates published per detailed occupation. The ORS is a voluntary survey, with a limited sample compared to other surveys, and so the BLS frames completeness in terms of the coverage the ORS does provide about the requirements of work in the U.S. economy.

Regarding the breadth of coverage, BLS published preliminary second wave ORS estimates for 426 detailed occupations in November 2022. These 426 detailed occupations represent approximately 91 percent of civilian employment in the U.S. in 2022. The BLS also published estimates for all 22 in-scope occupational groups in the November 2022 release.

Regarding the depth of coverage, among the detailed occupations with published estimates, the BLS published an average of 181 preliminary second wave estimates per detailed occupation in the November 2022 release. The ORS calculates categorical (percentages and modes) and continuous (means and percentiles) estimates for job requirements. There are 424 potential ORS estimates that may be calculated for each occupation in the second wave. However, some job requirements may not be plausible for some occupations for a number of reasons and the BLS does not publish information for the ORS in these cases. The BLS understands stakeholder concerns and continues to explore ways of publishing more complete data for the final second wave estimates.

One commenter asked why there are more estimates published for the maximum weight lifted requirement than for the strength requirement in the November 2022 ORS release, and whether the maximum weight lifted information will be converted to publish more strength estimates in the next ORS release. While estimates for these two requirements provide complementary information about physical demands, the maximum weight lifted data element is not directly used in the calculation of estimates for strength requirements. The ORS Calculation section of the HOM and the Strength factsheet explain that strength requirements are calculated using other data elements: the weight and duration associated with lifting and carrying and, in some cases, standing.

Two commenters requested that the ORS report data reflecting industry as well as occupation. The BLS understands data users may be interested in seeing more granular detail about industries. This type of estimate could be explored for consideration in a future wave. One key consideration that might limit the estimates and level of industry detail that could be produced is the ORS sample size.

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. The BLS is exploring whether the task data could be captured and combined to produce meaningful task lists in future waves.

USE OF ORS DATA

One commenter expressed concern about the complexity for combining the ORS and the OEWS data to calculate occupational employment for job requirements. A BLS factsheet on this topic was cited in the comment, with two specific concerns raised: 1) the need to automate the calculations and 2) the size and interpretation of the standard error as additional ORS factors are included in the calculation.

The ORS was not designed to provide occupational employment counts. The BLS developed the factsheet in response to data users citing the need to calculate occupational employment for job requirements. The factsheet provides three approaches for combining the ORS and the OEWS estimates. It also provides simple and more rigorous approaches for using standard errors to create confidence intervals. Data users should consider their intended use and each survey's design, methodology, and reliability before combining estimates and deriving confidence intervals. The BLS has made the SSA aware of standard error considerations when combining the ORS and the OEWS estimates as noted in the fact sheet. The BLS will continue to evaluate options for additional formats and outputs that will improve the ability to access, understand, and use available data.

Several commenters expressed concern about applying the ORS estimates to the adjudication process. One commenter was specifically concerned that the ORS was not collecting information about DOT Work Fields and Materials, Products, Subject Matter, and Services (MPSMS) codes. The commenter noted that this information is needed to provide appropriate methods for transferable skills analysis and searches, a Code of Federal Regulations (CFR) requirement for certain kinds of claims decision making by the SSA. The SSA is developing proposed policy to operationalize use of ORS data.

One commenter had concerns about the design of the ORS homepage on the BLS website and using it to extract meaningful data. BLS continually updates and works to improve the ORS homepage. The BLS understands stakeholder concerns about the usability of the ORS data and developed factsheets, guidance, and other tools to assist stakeholders in using the ORS data.

Outside Consultation

BLS staff engaged in extensive consultation with staff of the SSA's Office of Research, Demonstration, and Employment Support, Office of Research, Evaluation and Statistics, and Office of Disability Policy on all aspects of the survey. High level executive meetings are conducted quarterly between the SSA and the 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 (DUAC) meetings. The DUAC provides advice to the BLS from the points of view of data users from various sectors of the U.S. economy, including the labor, business, research, academic and government communities. 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:

- Disability Statistics Compendium in February 2021
- DOL Data Board Meeting in March 2021
- National Institute of Occupational Safety and Health (NIOSH) in March and April 2021
- BLS Technical Advisory Committee (TAC) in May 2021
- BLS Office of Employment and Unemployment Statistics (OEUS) in May 2021
- Occupational Safety and Health Administration (OSHA) in September 2021
- Federal Committee on Statistical Methodology (FCSM) in November 2021
- International Association of Rehabilitation Professionals (IARP) in November 2021
- American Board of Vocational Experts (ABVE) in March 2022
- BLS Atlanta Data User's conference in September 2022
- International Association of Rehabilitation Professionals (IARP) in October 2022

Note: As of November 2024, recent activities include the following:

- Employment Training Administration (ETA) and other representatives from other DOL agencies in January 2023
- American Board of Vocational Experts (ABVE) in March 2023
- National Association of Disability Representatives (NADR) in March 2023
- BLS Technical Advisory Committee (TAC) in May 2023
- Social Security Advisory Board in June 2023
- Society for Human Resources Management in June 2023
- World at Work in June 2023
- GovFuture Forum in July 2023
- International Association of Rehabilitation Professionals (IARP) in August 2023
- International Association of Rehabilitation Professionals (IARP) in October 2023
- DOL CEO Seminar Series on Telework in November 2023
- Presentation to a delegation from Estonia in November 2023
- Overview of ORS for DOL Chief Economist in February 2024
- Customer Service Community of Practice on ORS (BLS-wide) in February 2024
- University of Georgia in February 2024
- American Board of Vocational Experts (ABVE) in March 2024
- National Association of Disability Representatives (NADR) in March 2024
- Illinois Career Development Association in April 2024
- National Organization of Social Security Claimant's Representatives (NOSSCR) in May 2024
- General Accounting Office Impact of Telework on Transportation in May 2024
- World at Work in May 2024
- American Rehabilitation Economics Association in May 2024
- Society for Human Resources Management in June 2024

- American Society of Safety Professionals (ASSP) in August 2024
- Workers Compensation Institute (WCI) in August 2024
- International Association of Rehabilitation Professionals (IARP) in November 2024
- Presentation to a delegation to Saudi Arabia in November 2024

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.

The 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 the BLS cost, the ORS is an initiation-only survey. Respondents will not be asked to provide data more than once a wave for a sampled establishment, as described in Part B, Section 2a.

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

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

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 FY2023, FY2024, FY2025, and FY2026 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.

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. Only one form version is used per interview based on what best meets an individual field economist's note taking needs for that interview. 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 1. Functions and uses of ORS forms

Information Collected	Purpose/Activity	Form used	Time
General establishment information, and work schedule; records check of these data	ORS initiation (1a)	Establishment and schedule collection form (ORS Form 15-1G; ORS Form 15-1P)	54 minutes (through July 2025) 34 minutes (August 2025 forward)
Initiation collection of vocational preparation, mental and cognitive demands, physical demands, environmental conditions, and job tasks; records check of this collection	ORS initiation (1a) ORS initiation (1b)	Occupation requirements (ORS Form PPD-4P) Occupation requirements (ORS Form PPD-4G) Occupation requirements (ORS Form PPD-4GF) Occupation requirements (ORS Form PPD-4PF) Occupation requirements (ORS Form PPD-4GAF) Occupation requirements (ORS Form PPD-4PAF)	66 minutes

Private Sector Establishments

Table 2a. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2023 – August to September 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	1063	120	2126.0
Activity 1 Initiation of ORS (non-response)	1063	5	88.6
Activity 2 Re-interview for quality assurance activities	53	15	13.3
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2023 TOTALS	2179	--	2227.9

Table 2b. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2024 - October 2023 to September 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	6216	120	12432.0
Activity 1 Initiation of ORS (non-response)	6216	5	518.0
Activity 2 Re-interview for quality assurance activities	311	15	77.8
Activity 3 Testing of occupational requirements collection	250	60	250.0
FY 2024 TOTALS	12993	--	13277.8

Table 2c. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2025 - October 2024 to September 2025

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	5259	117	10255.1
Activity 1 Initiation of ORS (non-response)	5259	5	438.3
Activity 2 Re-interview for quality assurance activities	263	15	65.8
Activity 3 Testing of occupational requirements collection	800	60	800.0
FY 2025 TOTALS	11581	--	11559.1

Table 2d. Anticipated private sector sample burden for the Occupational Requirements Survey by activity type for FY 2026 - October 2025 to July 2026

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	3719	100	6198.3
Activity 1 Initiation of ORS (non-response)	3719	5	309.9
Activity 2 Re-interview for quality assurance activities	186	15	46.5
Activity 3 Testing of occupational requirements collection	800	60	800.0
FY 2026 TOTALS	8424	--	7354.7

State and Local Government Establishments

Table 3a. Anticipated state and local government sample burden for the Occupational Requirements Survey by activity type for FY 2023 - August-September 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	263	120	526.0
Activity 1 Initiation of ORS (non-response)	113	5	9.4
Activity 2 Re-interview for quality assurance activities	13	15	3.3
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2023 TOTALS	389	--	538.7

Table 3b. Anticipated state and local government sample burden for the Occupational Requirements Survey by activity type for FY 2024 - October 2023 to September 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	1536	120	3072.0
Activity 1 Initiation of ORS (non-response)	658	5	54.8
Activity 2 Re-interview for quality assurance activities	77	15	19.3
Activity 3 Testing of occupational requirements collection	50	60	50
FY 2024 TOTALS	2321	--	3196.1

Table 3c. Anticipated state and local government sample burden for the Occupational Requirements Survey by activity type for FY 2025 - October 2024 to September 2025

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	1300	117	2535.0
Activity 1 Initiation of ORS (non-response)	557	5	46.4
Activity 2 Re-interview for quality assurance activities	65	15	16.3
Activity 3 Testing of occupational requirements collection	200	60	200.0
FY 2025 TOTALS	2122	--	2797.7

Table 3d. Anticipated state and local government sample burden for the Occupational Requirements Survey by activity type for FY 2026 - October 2025 to July 2026

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	919	100	1531.7
Activity 1 Initiation of ORS (non-response)	394	5	32.8
Activity 2 Re-interview for quality assurance activities	46	15	11.5
Activity 3 Testing of occupational requirements collection	200	60	200.0
FY 2026 TOTALS	1559	--	1776.0

Total Anticipated Burden – Private Sector and State and Local Government

Table 4. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2023 – August-September 2023

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	1326	120	2652.0
Activity 1 Initiation of ORS (non-response)	1176	5	98.0
Activity 2 Re-interview for quality assurance activities	66	15	16.5
Activity 3 Testing of occupational requirements collection	0	60	0.0
FY 2023 TOTALS	2568	--	2766.5

Table 5. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2024 - October 2023 to September 2024

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	7752	120	15504.0
Activity 1 Initiation of ORS (non-response)	6874	5	572.8
Activity 2 Re-interview for quality assurance activities	388	15	97.0
Activity 3 Testing of occupational requirements collection	300	60	300.0
FY 2024 TOTALS	15314	--	16473.8

Table 6. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2025 - October 2024 to September 2025

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	6559	117	12790.1
Activity 1 Initiation of ORS (non-response)	5816	5	484.7
Activity 2 Re-interview for quality assurance activities	328	15	82.0
Activity 3 Testing of occupational requirements collection	1000	60	1000.0
FY 2025 TOTALS	13703	--	14356.7

Table 7. Anticipated total sample burden for the Occupational Requirements Survey by activity type for FY 2026 - October 2025 to July 2026

Collection Activity	Total Annual Responses by Activity	Minutes per Response	Total Hours
Activity 1 Initiation of ORS	4638	100	7730.0
Activity 1 Initiation of ORS (non-response)	4113	5	342.8
Activity 2 Re-interview for quality assurance activities	232	15	58.0
Activity 3 Testing of occupational requirements collection	1000	60	1000.0
FY 2026 TOTALS	9983	--	9130.8

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 2023	2179	1	2179	61.35	2227.9
FY 2024	12993	1	12993	61.32	13277.8
FY 2025	11581	1	11581	59.89	11559.1
FY 2026	8424	1	8424	52.38	7354.7
Overall Average	8794	1	8794	58.73	8604.9

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 2023	389	1	389	83.09	538.7
FY 2024	2321	1	2321	82.62	3196.0
FY 2025	2122	1	2122	79.11	2797.9
FY 2026	1559	1	1559	68.35	1776.0
Overall Average	1598	1	1598	78.29	2077.1

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	\$68.60	70
Office and administrative support	\$34.87	30
Weighted Average Hourly Wage Rate	\$58.48	

Hourly costs of pay and benefits measured by the ECEC data series for Civilian workers in June 2024.

The table below summarizes the data, including figures on the actual number of respondents to be contacted each fiscal 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 2023	2568	2568	65	2767	\$51.82	\$143,385.9
FY 2024	15314	15314	65	16474	\$58.48	\$963,399.5
FY 2025	13703	13703	63	14357	\$58.48	\$839,597.4
FY 2026	9983	9983	55	9131	\$58.48	\$533,980.9
Total Average	10392	10392		10682	--	\$620,090.9

*Initiations, quality assurance contacts, and collection testing

Note: The sum of individual items in all tables above 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 startup 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 is part of the Interagency Agreements between the BLS and the SSA. The estimated cost of the agreement and survey is \$35 million for FY 2025.

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

In an effort to reduce annual costs, the BLS is seeking approval to extend the collection and processing time used to publish final ORS estimates. BLS is also seeking approval to eliminate data elements pertaining to job work levels.

The overall average respondent burden hours are estimated to decrease from 13,639 to 10,682 due to the sample extension and the removal of work level elements. Overall average total burden costs are expected to decrease from \$706,773 to \$620,090.

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 within the wave in order to publish the latest preliminary estimates for the wave. Final estimates for the third wave are expected to be published in 2032. 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 the ORS collection forms, 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.