

The Social Security Administration's Use of Occupational Information in Disability Determinations: Background and Considerations for Congress

December 4, 2025

Congressional Research Service

<https://crsreports.congress.gov>

R48748



R48748

December 4, 2025

Emma K. Tatem
Analyst in Social Policy

The Social Security Administration's Use of Occupational Information in Disability Determinations: Background and Considerations for Congress

For over a decade, as part of its Occupational Information System (OIS) project, the Social Security Administration (SSA) has been developing a new source of occupational information for making certain disability determinations under the Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs. Despite ongoing congressional interest in the project's status, to date, SSA has not fully implemented the new OIS.

SSDI and SSI have a work-limiting definition of *disability* for adults. Under the statutory definition, individuals must have severe and long-lasting impairments that prevent them from performing substantial gainful activity—defined by SSA as work resulting in earnings above a set amount. By law, individuals' impairments must be of such severity as to prevent them from performing (1) certain work that they have done in the past and (2) any other substantial gainful work that exists in significant numbers in the national economy, considering their vocational factors of age, education, and work experience.

Sometimes, medical factors alone are enough for SSA to determine that individuals' impairments meet the disability criteria in law. In other cases, SSA compares individuals' remaining work abilities and vocational factors against the requirements of work in the national economy to make medical-vocational determinations about whether individuals can still perform substantial gainful work. To do so, SSA requires information about occupations that exist in the U.S. economy, how they are performed, and their demands, such as the strength and skill levels required to do them. Currently, occupational information from the Department of Labor's (DOL's) Dictionary of Occupational Titles (DOT) forms the basis of SSA's regulations and policies for determining the existence of work in the national economy and its requirements, as well as individuals' abilities to perform that work.

However, the DOT is widely considered to be outdated. The DOT was last updated in 1991 and as such, DOT occupations and their associated requirements do not capture labor market changes that have occurred since that time. Furthermore, the DOT was not designed for SSA disability evaluation and does not contain all the information SSA needs for determining disability. DOL's replacement for the DOT, called O*NET, does not meet SSA's adjudication needs either.

SSA has been partnering with the Bureau of Labor Statistics (BLS) since FY2012 to develop the Occupational Requirements Survey (ORS). According to SSA, ORS will be the main source of OIS's updated occupational information along with selected information from other sources. Between FY2012 and FY2024, SSA obligated over \$300 million to the OIS project. However, SSA has not fully implemented the new OIS. According to SSA, before it can do so, it must first revise its regulations and internal policies and modify its computer systems.

Contents

Introduction	1
Overview of SSA's Disability Programs	1
Social Security Disability Insurance (SSDI)	1
Supplemental Security Income (SSI)	2
Definition of <i>Disability</i>	2
Disability Determination Process	2
Step 1. Work Activity Test	4
Step 2. Severity and Duration Test	4
Step 3. Medical Listings Test	4
Residual Functional Capacity (RFC) Assessment	4
Step 4. Previous Work Test	5
Step 5. Any Work Test	5
Occupational Information in Initial Adult Disability Determinations	6
Dictionary of Occupational Titles (DOT)	9
Determining Ability to Perform Past Relevant Work	11
Determining Ability to Perform Work That Exists in the National Economy	12
RFC at Step 5	12
Vocational Factors	13
The Medical-Vocational Guidelines	16
Concerns Raised About SSA's Continued Reliance on the DOT for Disability Evaluation	20
SSA's Occupational Information System (OIS) Project	22
Occupational Requirements Survey (ORS)	23
Status of OIS	24
Considerations for Congress	25
Adequacy of Information	25
Project's Costs	26
Implementation Timeline	27
Implications of OIS Implementation for SSDI and SSI Eligibility	28

Figures

Figure 1. Initial Disability Determination Process for Adult SSDI and SSI Claims	3
--	---

Tables

Table 1. DDS Disability Determinations by Outcome and Reason, 2022	8
Table 2. Limits of Weights Lifted or Carried or of Force Exerted by Exertional Level	13
Table 3. Vocational Factors Considered in SSA Disability Determinations	15
Table 4. Selected Medical-Vocational Grid Rules Used in SSA Adult Disability Determinations	17
Table 5. Applicability of SSA's Grid Rules in Adult Initial Disability Claims	19
Table 6. Comparison of Selected DOT and ORS Attributes	24

Contacts

Author Information.....	28
-------------------------	----

Introduction

The Social Security Administration (SSA) has been developing a new source of occupational information for making certain disability determinations under the Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) programs. This effort, known as the Occupational Information System (OIS) project, has been in progress for over a decade and has cost over \$300 million. Despite ongoing congressional interest in the project's status, SSA has not fully implemented OIS. SSA currently relies on occupational information that was last updated in 1991 to decide whether some individuals qualify for benefits under its disability programs.

SSA uses occupational information when it cannot decide disability based solely on medical factors. In such cases, SSA compares individuals' remaining work abilities and vocational factors—age, education, and work experience—against the requirements of work that exists in the national economy to make medical-vocational determinations about whether individuals can still perform substantial gainful work.

This report details how SSA currently uses occupational information in disability determinations; discusses concerns raised by Congress, courts, and others about SSA's continued reliance on outdated occupational information in such determinations; describes SSA's ongoing efforts to update the occupational information it uses as part of the OIS project; and presents potential considerations for Congress.

Overview of SSA's Disability Programs

SSA administers two federal income support programs for people with long-term, work-limiting disabilities: SSDI and SSI.¹ This section provides an overview of the SSDI and SSI programs as well as the definition of *disability* and the five-step disability determination process that SSA uses to evaluate whether adults initially qualify for benefits.

Social Security Disability Insurance (SSDI)

SSDI is part of the Old-Age, Survivors, and Disability Insurance program—commonly known as Social Security.² Social Security is a federal social insurance program that provides monthly cash benefits to insured workers and their eligible family members in the event of the worker's retirement, death, or disability. Workers become insured against these events by working for sufficient periods in jobs that are covered by Social Security and subject to its payroll tax.

The program's SSDI component provides monthly cash benefits to insured workers below full retirement age (65-67, depending on year of birth) who experience qualifying disabilities that limit their ability to work. SSDI benefits are based on insured workers' career-average earnings in jobs covered by Social Security. SSDI benefits are primarily financed by dedicated payroll taxes levied on the earnings of covered workers and credited to the Disability Insurance Trust Fund. SSDI beneficiaries automatically qualify for health care coverage under Medicare, generally after serving a 24-month waiting period.

¹ For more information on SSDI and SSI, see CRS In Focus IF10506, *Social Security Disability Insurance (SSDI)*; CRS In Focus IF10482, *Supplemental Security Income (SSI)*; and CRS Report R44948, *Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI): Eligibility, Benefits, and Financing*.

² For more information on Social Security, see CRS In Focus IF10426, *Social Security Overview*; and CRS Report R42035, *Social Security Primer*.

Supplemental Security Income (SSI)

SSI is a federal means-tested public assistance program that provides monthly cash benefits to eligible adults and children who meet the program's definition of *disability* and to eligible adults age 65 or older regardless of their disability status. The program is intended to provide a guaranteed minimum income to people who have difficulty meeting their basic living expenses due to disability or age and who have little or no Social Security or other income and limited resources (i.e., assets). Unlike SSDI, there are no work or contribution requirements to qualify for SSI. However, because the program is based on need (i.e., means-tested), it is restricted to people whose countable income and resources are within limits set in law. SSI pays a uniform maximum monthly benefit, which is reduced by an individual's countable income (e.g., earnings from work, Social Security benefits, cash from family or friends). SSI payments are financed by annual appropriations from the general fund of the U.S. Treasury. Some states supplement the federal SSI payment using their own funds. In most states, SSI recipients automatically qualify for health care coverage under Medicaid. SSI is administered by SSA but is separate from Social Security.

Definition of *Disability*

Both SSDI and SSI use the same long-term, work-limiting definition of *disability* for adults.³ The Social Security Act defines *disability* as the inability to engage in any substantial gainful activity (SGA) due to any medically determinable physical or mental impairment that is expected to result in death or has lasted, or is expected to last, for at least 12 consecutive months.⁴ Under law, individuals' impairments must be severe enough to prevent them from performing their past relevant work (if any) as well as any other substantial gainful work that exists in significant numbers in the national economy, considering their age, education, and work experience. Such work need not exist in the immediate area in which an individual lives, nor must a specific job vacancy exist for the individual.⁵ SSA generally uses a monthly earnings level specified in regulations to determine if a person's work activity represents SGA, which for 2025 is \$1,620 per month for most individuals.⁶ (SGA amounts are indexed for average wage growth and generally increase each year.) An individual with monthly earnings over the SGA level is usually considered able to engage in SGA and would generally be found not disabled for purposes of SSDI and SSI (although certain exceptions apply). SSDI and SSI do not pay benefits for partial or short-term disabilities.

Disability Determination Process

SSA uses a five-step sequential evaluation process outlined in its regulations and subregulatory policies to initially decide whether adults have impairments that meet the disability definition in law.⁷ SSA's initial disability determination process generally proceeds in a set order. At certain

³ Under the SSI program, a different statutory definition of *disability* applies to individuals under age 18. For more information, see CRS Report R44948, *Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI): Eligibility, Benefits, and Financing*.

⁴ Social Security Act, §§223(d)(1)(A) and 1614(a)(3)(A) (42 U.S.C. §§423(d)(1)(A) and 1382c(a)(3)(A)).

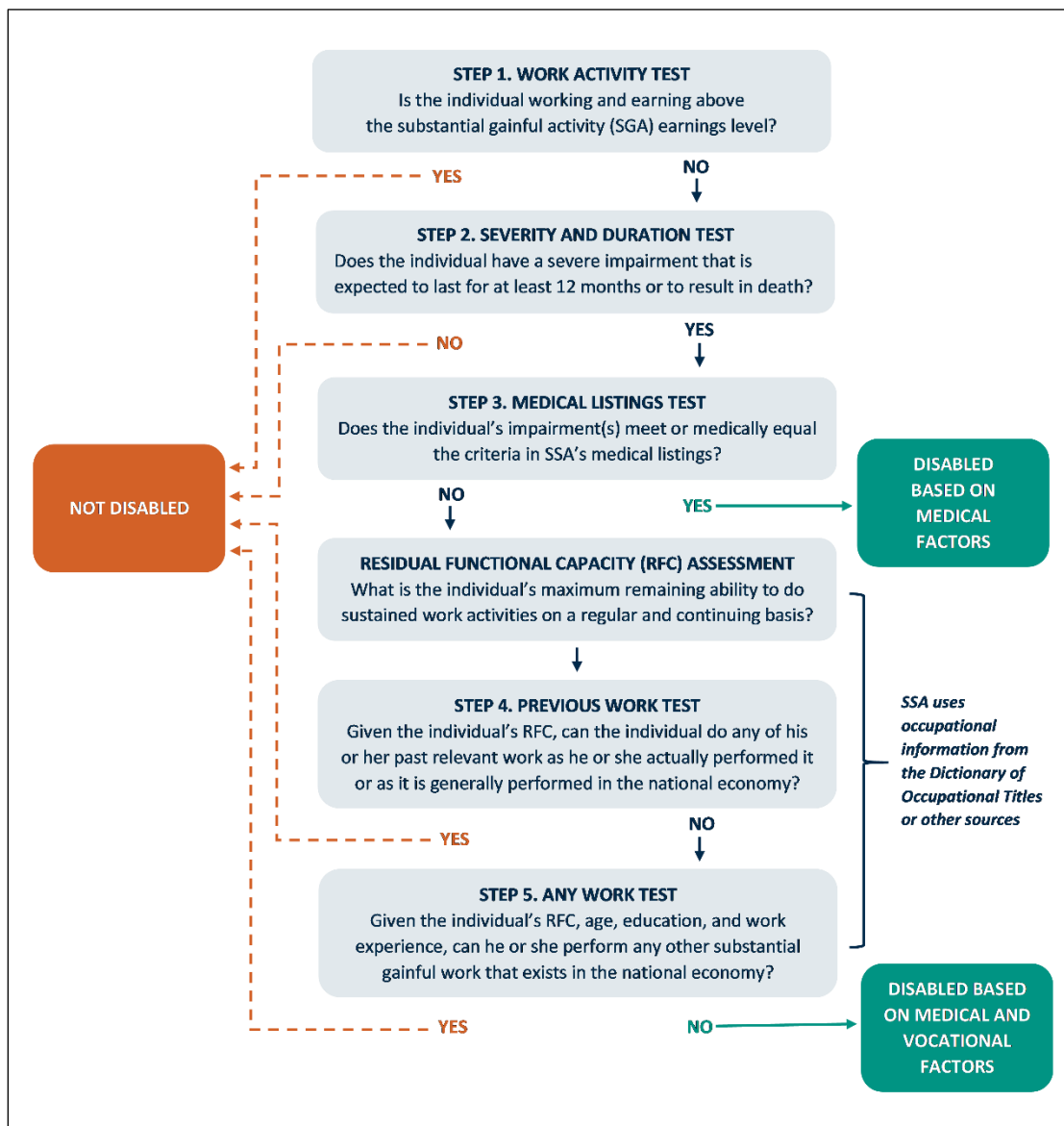
⁵ Social Security Act, §§223(d)(2) and 1614(a)(3)(B) (42 U.S.C. §§423(d)(2) and 1382c(a)(3)(B)).

⁶ SSA, "Substantial Gainful Activity," <https://www.ssa.gov/oact/cola/sga.html>. The SGA earnings level is a proxy measure for an individual's ability to perform substantial work for disability evaluation purposes. It is not designed to be a financial eligibility test.

⁷ Separate processes are used to periodically re-evaluate whether individuals continue to meet the disability definition and to determine disability in children. For more information, see CRS Report R44948, *Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI): Eligibility, Benefits, and Financing*.

steps of this process, SSA may decide that an individual is disabled or not disabled and the initial determination ends without completing the remaining steps. Individuals may generally be found *disabled* for the purpose of disability benefit eligibility at Step 3 of the process based on medical factors or at Step 5 of the process based on medical and vocational factors. Individuals may generally be found *not disabled* at any step except Step 3 (Figure 1).⁸

Figure 1. Initial Disability Determination Process for Adult SSDI and SSI Claims



Source: CRS based on Subpart P of 20 C.F.R. §404 and Subpart I of 20 C.F.R. §416.

⁸ 20 C.F.R. §§404.1520 and 416.920.

Step 1. Work Activity Test

At Step 1 of the disability determination process, SSA assesses whether individuals are working and earning above the SGA earnings level (i.e., \$1,620 per month for most individuals in 2025).⁹ Individuals who are working above the SGA earnings level are found not disabled. Individuals who are working at or below the SGA earnings level proceed to Step 2.

Step 2. Severity and Duration Test

At Step 2, federally funded state Disability Determination Services (DDS) agencies—which make disability determinations on behalf of SSA—determine whether individuals have impairments of sufficient severity and duration.¹⁰ An individual must have a severe medically determinable physical or mental impairment that is expected to result in death or has lasted or is expected to last for at least one full year.¹¹ SSA considers a severe impairment to be one that significantly limits an individual's physical or mental ability to do basic work activities.¹² Individuals who do not have impairments that meet the severity and duration criteria are found not disabled. Individuals who have impairments that meet the severity and duration criteria proceed to Step 3.

Step 3. Medical Listings Test

At Step 3, the DDS will compare an individual's impairment(s) against the medical and functional criteria of impairments included in SSA's regulatory Listing of Impairments (commonly referred to as "the listings").¹³ The listings for adults contain examples of medically determinable impairments that SSA considers severe enough to prevent individuals from performing any gainful activity, regardless of their age, education, or work experience—in other words, those impairments that SSA has determined meet the definition of *disability* in law based on medical factors alone. The listings were created to quickly screen relatively clear-cut cases, leaving SSA more time to evaluate more difficult cases at the latter stages of the process. Individuals with impairments that meet or medically equal the criteria of listed impairments are found disabled. Individuals with impairments that do not meet or equal the criteria of listed impairments proceed to Step 4 after SSA first determines their residual functional capacity (RFC).

Residual Functional Capacity (RFC) Assessment

If medical factors alone are not enough to find that an individual meets the definition of *disability* at Step 3, the DDS will generally perform a function-by-function assessment to determine the individual's RFC. An individual's RFC is typically his or her maximum remaining ability to do sustained work activities in an ordinary work setting on a regular and continuing basis (i.e., eight hours a day, for five days a week, or an equivalent work schedule).¹⁴ In other words, it is the most that the individual can do despite the limitations or restrictions caused by his or her medically

⁹ SSA, "Substantial Gainful Activity."

¹⁰ For more information on DDSs, see Social Security Advisory Board, "Social Security and State Disability Determination Services Agencies: A Partnership in Need of Attention," April 6, 2023, <https://www.ssab.gov/research/social-security-and-state-dds-agencies-partnership-in-need-of-attention/>.

¹¹ 20 C.F.R. §§404.1509, 404.1521, 416.909, and 416.921.

¹² 20 C.F.R. §§404.1522 and 416.922.

¹³ 20 C.F.R. §§404.1525 and 416.925; Appendix 1 to Subpart P of Part 404, 20 C.F.R.

¹⁴ SSA, "SSR 96-8p: Policy Interpretation Ruling Titles II and XVI: Assessing Residual Functional Capacity in Initial Claims," July 2, 1996, https://www.ssa.gov/OP_Home/rulings/di/01/SSR96-08-di-01.html.

determinable impairment(s).¹⁵ The RFC assessment considers both the individual's remaining exertional and nonexertional capacities for performing sustained, work-related activities. An individual's exertional capacity is his or her maximum remaining ability to do each of seven physical-strength-related activities: sitting, standing, walking, lifting, carrying, pushing, and pulling.¹⁶ An individual's nonexertional capacity is his or her maximum remaining ability to do activities not related to physical strength, including stooping, climbing, reaching, handling, seeing, hearing, speaking, understanding and remembering instructions, responding appropriately to supervision, and tolerating temperature extremes.¹⁷ Individuals may have only exertional or nonexertional limitations or restrictions, or they may have a combination of both.¹⁸ The RFC includes a narrative discussion of the individual's ability to do the above work-related activities and the maximum amount of the activities that the individual can perform based on the evidence in the case record.¹⁹ The DDS uses the RFC assessment in disability determinations involving both medical and vocational factors, which are made at Steps 4 and 5.²⁰ For example, at Step 5, the DDS may determine that the individual's RFC limits him or her to performing, at most, sedentary work.

Step 4. Previous Work Test

At Step 4, DDSs will determine whether individuals, given their RFCs, can perform their past relevant work (if any) as they actually performed it or as it is generally performed in the national economy.²¹ SSA's regulations define *past relevant work* as work that an individual did within the past five years that (1) was SGA, (2) lasted long enough for the individual to learn to do it, and (3) was performed for at least 30 consecutive days.²² Individuals who can do their past relevant work are found not disabled. Individuals who cannot do their past relevant work (or do not have any past relevant work) proceed to Step 5.

Step 5. Any Work Test

At Step 5, DDSs will decide whether individuals who cannot do their past relevant work (or do not have any past relevant work) can adjust to any other substantial gainful work that exists in significant numbers in the national economy given their RFCs and considering the vocational factors of their age, education, and work experience.²³ It does not matter whether the work exists in the immediate area where the individuals live, whether specific job vacancies exist for them, or

¹⁵ 20 C.F.R. §§404.1545 and 416.945; SSA, Program Operations Manual System (POMS), "DI 24510.006 Assessing Residual Functional Capacity (RFC) in Initial Claims (SSR 96-8p)," February 12, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0424510006>.

¹⁶ SSA, POMS, "DI 24510.006 Assessing Residual Functional Capacity (RFC) in Initial Claims (SSR 96-8p)," February 12, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0424510006>.

¹⁷ SSA, POMS, "DI 24510.006 Assessing Residual Functional Capacity (RFC) in Initial Claims (SSR 96-8p)."

¹⁸ SSA, POMS, "DI 24510.006 Assessing Residual Functional Capacity (RFC) in Initial Claims (SSR 96-8p)."

¹⁹ SSA, "SSR 96-8p: Policy Interpretation Ruling Titles II and XVI."

²⁰ 20 C.F.R. §§404.1545 and 416.945.

²¹ 20 C.F.R. §§404.1560 and 416.960.

²² 20 C.F.R. §§404.1560 and 416.960. SSA used to consider past relevant work to be work that an individual did above the SGA earnings level within the past 15 years before the individual's disability onset, until a rule change, which took effect on June 22, 2024, shortened the lookback period to five years and added the 30-day minimum requirement. See SSA, "Intermediate Improvement to the Disability Adjudication Process, Including How We Consider Past Work," 89 *Federal Register* 27653, April 18, 2024, <https://www.federalregister.gov/d/2024-08150>; and SSA, "Intermediate Improvement to the Disability Adjudication Process, Including How We Consider Past Work," 89 *Federal Register* 48138, June 5, 2024, <https://www.federalregister.gov/d/2024-12285>.

²³ 20 C.F.R. §§404.1560 and 416.960.

whether they would be hired for such work.²⁴ Unlike at Steps 1-4, at Step 5 the DDS bears the responsibility of providing evidence that there is work that exists in significant numbers in the national economy that individuals can perform.²⁵ Individuals determined able to adjust to other work by the DDS are found not disabled. Individuals determined unable to adjust to other work are found disabled.

Step 5 completes the disability determination process, at which point the DDS relays the determination to SSA to finalize processing and issue the initial disability benefit award or denial notice.

In 2022, about 1.6 million people applied for SSDI worker benefits.²⁶ Of those who applied and received disability determinations, 34.6% were allowed by DDSs at the initial level.²⁷ In 2022, roughly 0.8 million adults ages 18-64 applied for SSI payments.²⁸ Of those adults who applied and received disability determinations, 31.3% were allowed by DDSs at the initial level.²⁹ Individuals who receive initial favorable disability determinations from the DDSs may later be denied by SSA for technical reasons. An individual who disagrees with SSA's initial determination may appeal the decision under certain conditions.³⁰

Occupational Information in Initial Adult Disability Determinations

To meet the definition of *disability* under SSDI and SSI, the law requires adults to have medically determinable impairments of sufficient duration that is severe enough to prevent them from performing both (1) their past relevant work and (2) any other substantial gainful work that exists in significant numbers in the national economy, considering the vocational factors of their age,

²⁴ 20 C.F.R. §§404.1566 and 416.966.

²⁵ 20 C.F.R. §§404.1512(b)(3), 404.1560(c)(2), 416.912(b)(3), and 416.960(c)(2); SSA, POMS, "HA 02530.003 Express Written Acknowledgement of the Limited Shifting of the Burden at the Last Step of the Sequential Evaluation Process," December 14, 2005, <https://secure.ssa.gov/apps10/poms.nsf/lnx/2502530003>; and SSA, Office of Hearings Operations, Office of the Chief Administrative Law Judge, *Vocational Expert Handbook*, January 6, 2025, p. 26, [https://www.ssa.gov/appeals/public_experts/Vocational_Experts_\(VE\)_Handbook-508_Jan25.pdf](https://www.ssa.gov/appeals/public_experts/Vocational_Experts_(VE)_Handbook-508_Jan25.pdf).

²⁶ SSA, "Annual Statistical Report on the Social Security Disability Insurance Program, 2023," Table 60, https://www.ssa.gov/policy/docs/statcomps/di_asr/2023/sect04.html. SSDI worker data include Social Security-only and concurrent Social Security and SSI claims.

²⁷ SSA, "Annual Statistical Report on the Social Security Disability Insurance Program, 2023," Table 61. SSDI worker data include Social Security-only and concurrent Social Security and SSI claims with medical decisions at the initial level of review. They exclude cases that were denied for technical reasons before reaching the DDSs. SSA data are subject to revision and may change over time.

²⁸ SSA, "SSI Annual Statistical Report, 2023," Table 69, https://www.ssa.gov/policy/docs/statcomps/ssi_asr/2023/sect10.html. SSI adult data include SSI-only and concurrent Social Security and SSI claims.

²⁹ SSA, "SSI Annual Statistical Report, 2023," Table 70. SSI adult data include SSI-only and concurrent Social Security and SSI claims with medical decisions at the initial level of review. They exclude cases that were denied for technical reasons before reaching the DDSs. SSA data are subject to revision and may change over time.

³⁰ Social Security Act, §§205(b)(1) and 1631(c)(1)(A); 42 U.S.C. §§405(b)(1) and 1383(c)(1)(A). SSA's administrative appeals process generally consists of three levels of review: (1) a second complete review—called a *reconsideration*—of the individual's claim by a new reviewer who was not involved in the initial determination (reconsiderations of disability determinations are performed by state DDSs), (2) a hearing before an administrative law judge, and (3) a review of the case by the SSA Appeals Council. An individual usually must exhaust all three levels of SSA administrative review sequentially and receive a final decision from SSA before filing a civil action in a federal district court. Appeals of unfavorable disability determinations may involve an individual's ability to perform his or her past work or adjust to other work that exists in the national economy where SSA considers occupational information. However, this report focuses on SSA's use of occupational information at the initial level.

education, and work experience.³¹ Under SSA's five-step disability determination process, SSA sometimes determines that an individual meets the statutory definition of *disability* based on medical factors alone. SSA makes this type of allowance when, based on its own medical criteria, it determines that the individual's impairment is so severe that it would prevent anyone—regardless of age, education, or work experience—from performing *any* gainful work (i.e., Step 3).

However, this is a stricter definition of *disability* than the definition provided in law, which requires SSA to consider the combined effect of the individual's impairment *and* vocational factors (i.e., age, education, and work experience) on his or her ability to perform substantial gainful work that exists in the national economy.³² To make these latter types of disability determinations involving medical and vocational factors, SSA uses occupational information—mainly from the Dictionary of Occupational Titles (DOT)—along with individuals' RFCs—to determine whether they can perform their past relevant work (i.e., Step 4) or adjust to any other work that exists in significant numbers in the national economy given their vocational factors (i.e., Step 5).³³

As shown in **Table 1**, in 2022, 47.0% of the favorable disability determinations (i.e., allowances) made by DDSs on SSDI worker cases involved the consideration of an individual's ability to perform other work (i.e., medical factors alone were not enough to find the individual disabled), and 40.1% of favorable disability determinations made by DDSs on adult SSI cases involved the consideration of an individual's ability to perform other work.³⁴

Of all of the unfavorable disability determinations (i.e., denials) made by DDSs on SSDI worker cases in 2022, 7.6% were denied based on determinations that the individuals could do their past work, and 35.8% were denied based on determinations that the individuals were able to adjust to other work that exists in significant numbers in the national economy.³⁵ Of all the unfavorable disability determinations on adult SSI cases made by DDSs in 2022, 3.3% were denied based on determinations that individuals could do their past work, and 44.2% were denied based on determinations that the individuals were able to adjust to other work that exists in significant numbers in the national economy (**Table 1**).³⁶

³¹ Social Security Act, §§223(d) and 1614(a)(3) (42 U.S.C. §§423(d) and 1382c(a)(3)).

³² Social Security Act, §§223(d)(2)(A) and 1614(a)(3)(B) (42 U.S.C. §§423(d)(2)(A) and 1382c(a)(3)(B)).

³³ 20 C.F.R. §§404.1560 and 416.960. For more information see SSA, Occupational Information Development Advisory Panel (OIDAP), *Report of the Mental Cognitive Subcommittee of the Occupational Information Development Advisory Panel*, September 1, 2009, pp. C-74-79, <https://web.archive.org/web/20250124021602/https://www.ssa.gov/oidap/Documents/AppendixC.pdf>.

³⁴ SSA, "Annual Statistical Report on the Social Security Disability Insurance Program, 2023," Table 64; and SSA, "SSI Annual Statistical Report, 2023," Table 73. SSDI data include Social Security-only and concurrent Social Security and SSI claims with medical decisions at all levels of review and do not include SSI-only cases. SSI data include SSI-only and concurrent Social Security and SSI claims with medical decisions at all levels of review and do not include Social Security-only cases. Cases allowed for medical reasons (i.e., *medically allowed*) may later be denied for nonmedical reasons. Data are subject to revision and may change over time.

³⁵ SSA, "Annual Statistical Report on the Social Security Disability Insurance Program, 2023," Table 65. The ability to do other work was the most common reason for medical denial in 2022. These data include Social Security-only and concurrent Social Security and SSI claims with medical decisions at all levels of review and do not include SSI-only cases. Data are subject to revision and may change over time.

³⁶ These data include SSI-only and concurrent Social Security and SSI claims with medical decisions at all levels of review and do not include Social Security-only cases. SSA, "SSI Annual Statistical Report, 2023," Table 74.

Table 1. DDS Disability Determinations by Outcome and Reason, 2022

Program	Allowed by the DDS				Denied by the DDS				
	At Step 3 Based on Medical Factors Alone	At Step 5 Based on Medical-Vocational Factors	For Other Reasons ^a	Total	At Step 2 Based on Medical Factors	At Step 4 Based on Ability to Do Past Relevant Work	At Step 5 Based on Ability to Do Any Other Work	For Other Reasons ^b	Total
SSDI	50.2%	47.0%	2.7%	100.0%	21.9%	7.6%	35.8%	34.8%	100.0%
SSI	55.7%	40.1%	4.2%	100.0%	6.9%	3.3%	44.2%	45.5%	100.0%

Source: SSA, “Annual Statistical Report on the Social Security Disability Insurance Program, 2023,” Tables 64 and 65, https://www.ssa.gov/policy/docs/statcomps/di_asr/2023/sect04.html; and SSA, “SSI Annual Statistical Report, 2023,” Tables 73 and 74, https://www.ssa.gov/policy/docs/statcomps/ssi_asr/2023/sect10.html.

Notes: SSDI = Social Security Disability Insurance; SSI = Supplemental Security Income. Data are for applications submitted in 2022. SSDI data represent workers only and include Social Security–only and concurrent Social Security and SSI claims with medical decisions at all levels of review. SSI data represent adults only and include SSI-only and concurrent Social Security and SSI claims with medical decisions at all levels of review. Medically allowed cases may later be denied for nonmedical reasons. SSA data are subject to revision and may change over time. Percentages may not sum to 100.0 due to rounding.

- a. Other factors may include cases in which disability was previously established and in which the basis for the determination is not available.
- b. Other factors for SSDI may include cases in which the applicant has an impairment resulting from drug addiction or alcoholism, provided insufficient medical evidence, failed to cooperate, failed to follow prescribed treatment, did not want to continue development of the claim, and returned to substantial work before disability could be established and cases denied at or above the hearing level for which the basis of determination is not available. Other factors for SSI may include cases in which the applicant provided insufficient evidence, failed to cooperate, failed to follow prescribed treatment, did not want to continue development of the claim, or returned to substantial work before disability could be established.

To make determinations about whether individuals can do their past work or adjust to other work, SSA needs information about occupations in the national economy, including what occupations exist, how they are performed, and the requirements needed to perform them (e.g., strength and training levels). SSA's regulations currently consider "reliable job information" for determining the existence and requirements of work to include information from the Department of Labor's (DOL's) DOT, the Census Bureau's County Business Patterns and other Census reports, the Bureau of Labor Statistics' (BLS') Occupational Outlook Handbook, and other occupational analyses prepared for SSA by state employment agencies.³⁷ According to its regulations, SSA may also use evidence provided by vocational specialists or vocational experts when assessing an individual's ability to perform past or other work.³⁸

Dictionary of Occupational Titles (DOT)

While SSA's regulations specify several sources of "reliable job information" that SSA may use, its primary source of occupational information is currently the DOT.³⁹ The DOT is a publication developed by DOL in 1938 and last updated in 1991 that contains information about over 12,000 U.S. occupations and their requirements. DOL field analysts prepared occupational information in the DOT based on their observations from visiting a selection of "typical" business establishments within particular industries.⁴⁰

The DOT defines *occupation* as a "collective description of a number of individual jobs performed, with minor variations, in many establishments."⁴¹ An occupational definition in the DOT generally includes a unique code identifying the occupation (i.e., DOT code); an occupational title (i.e., DOT title); an industry designation; a description of the occupation and how it is performed; and other selected characteristics of the occupation, such as the occupation's exertional (i.e., physical strength) level (i.e., sedentary, light, medium, heavy, or very heavy) and its Specific Vocational Preparation (SVP) level, which measures how long it takes a typical worker to develop the skills needed for average performance in the occupation.⁴² For example, the entry for the DOT title of administrative clerk (DOT Code 219.362-010) reads:

219.362-010 ADMINISTRATIVE CLERK (clerical) alternate titles: clerk, general office

Compiles and maintains records of business transactions and office activities of establishment, performing variety of following or similar clerical duties and utilizing knowledge of systems or procedures: Copies data and compiles records and reports.

³⁷ 20 C.F.R. §§404.1566 and 416.966.

³⁸ 20 C.F.R. §§404.1566 and 416.966. According to SSA's policies, disability examiners (DEs) at state DDSs are able to evaluate most vocational issues. However, DEs may also seek the expertise of vocational specialists (VSs) in cases involving complex vocational issues that are beyond the DEs' levels of expertise. See SSA, POMS, "DI 25003.001 Vocational Specialists," February 6, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0425003001>. In certain circumstances, DDSs are directed to obtain evidence from VSs. VSs are individuals designated by DDSs (e.g., senior DEs) who have specialized knowledge of and experience with vocational issues—including as they apply to Steps 4 and 5 of SSA's disability determination process—and have completed SSA-sponsored training. See SSA, POMS, "DI 25003.001 Vocational Specialists"; and SSA, POMS, "DI 25003.005 Designating Vocational Specialists," July 3, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425003005>.

³⁹ 20 C.F.R. §§404.1566 and 416.966; SSA, "Occupational Information System Project FAQ's," https://www.ssa.gov/disabilityresearch/ois_project_faqs.html.

⁴⁰ Michael J. Handel, *Methodological Issues Related to the Occupational Requirements Survey*, February 26, 2015, p. 10, <https://www.bls.gov/ors/research/collection/pdf/handel-methodological-issues-data-collection-full-report-feb15.pdf>.

⁴¹ DOL, *Dictionary of Occupational Titles* (4th Ed., Rev. 1991)—*Parts*, available at <https://www.dol.gov/agencies/oalj/PUBLIC/DOT/REFERENCES/DOTPARTS>.

⁴² DOL, *Dictionary of Occupational Titles* (4th Ed., Rev. 1991)—*Appendix C*, available at <https://www.dol.gov/agencies/oalj/PUBLIC/DOT/REFERENCES/DOTAPPC>.

Tabulates and posts data in record books. Computes wages, taxes, premiums, commissions, and payments. Records orders for merchandise or service. Gives information to and interviews customers, claimants, employees, and sales personnel. Receives, counts, and pays out cash. Prepares, issues, and sends out receipts, bills, policies, invoices, statements, and checks. Prepares stock inventory. Adjusts complaints. Operates office machines, such as typewriter, adding, calculating, and duplicating machines. Opens and routes incoming mail, answers correspondence, and prepares outgoing mail. May take dictation. May greet and assist visitors. May prepare payroll. May keep books. May purchase supplies. May operate computer terminal to input and retrieve data. May be designated according to field of activity or according to location of employment as Adjustment Clerk (retail trade; tel. & tel.); Airport Clerk (air trans.); Colliery Clerk (mine & quarry); Death-Claim Clerk (insurance); Field Clerk (clerical). May be designated: Agency Clerk (insurance); Auction Clerk (clerical); Construction-Records Clerk (construction; utilities); Shop Clerk (clerical).
 GOE: 07.01.02 STRENGTH: L GED: R4 M3 L3 SVP: 4 DLU: 88.⁴³

In 1966, DOL partnered with SSA to publish a companion to the DOT, the Selected Characteristics of Occupations (SCO), which provides additional information about selected physical and environmental demands of DOT occupations for SSA's purposes.⁴⁴ Like the DOT, the SCO was last updated in the early 1990s.⁴⁵

Court decisions and a change to the statutory definition of *disability* in the 1960s required SSA to begin considering the existence of work in the national economy when disability determinations could not be made based on medical factors alone.⁴⁶ SSA found that, of the occupational sources that existed at that time, the DOT was best able to meet its legal and programmatic requirements for making such determinations.⁴⁷ Consequently, SSA's regulations and policies for assessing whether individuals remain capable of performing the requirements of their past work or of any

⁴³ DOL, *Dictionary of Occupational Titles* (4th Ed., Rev. 1991)—*Clerical and Sales Occupations* 201.162-010 to 219.362-046, available at <https://www.dol.gov/agencies/oalj/PUBLIC/DOT/REFERENCES/DOT02A>. The last line of the occupational definition is referred to as the definition trailer, which lists selected characteristics of the occupation. GOE refers to Guide for Occupational Exploration. The GOE code is made up of three pairs of numbers, which classify the occupation according to interest area (first pair of digits), work group (second pair of digits), and subgroup (last pair of digits). *Strength* refers to the occupation's strength rating, which is expressed as one of five letters that correspond to the five possible strength ratings: S for sedentary, L for light, M for medium, H for heavy, or V for very heavy. GED refers to General Education Development. The GED scale consists of three pairs of letters and numbers corresponding to the occupation's level of reasoning development (R), mathematical development (M), and language development (L), respectively. SVP refers to Specific Vocational Preparation, which is expressed as a number on a scale from one to nine that measures the amount of time needed for the typical worker to develop the skills needed for average performance in the occupation. Occupations with an SVP of one require only a short demonstration and occupations with an SVP of nine require over 10 years. DLU refers to the Date of Last Update, which is the last two digits of the last year in which information was gathered about the occupation. The DOT was last updated in 1991, so the latest possible DLU is "91."

⁴⁴ DOL, *Selected Characteristics of Occupations (Physical Demands, Working Conditions, Training Time): A Supplement to the Dictionary of Occupational Titles, Third Edition*, 1966, available at <https://books.google.com/books?id=umKEljjwDEC&pg=PR1#v=onepage&q&f=false>.

⁴⁵ DOL, *Selected Characteristics of Occupations Defined in the Revised Dictionary of Occupational Titles*, 1993, available at <https://babel.hathitrust.org/cgi/pt?id=umn.31951d00286799y&view=lup&seq=1>; and SSA, *Occupational Information System Fiscal Year 2011 Research and Development Plan*, July 2011, p. 60, <https://web.archive.org/web/20250222155838/https://www.ssa.gov/oidap/Documents/FINAL%20POSTED%20VERSION—2011%2007%2025%20OIS%20RD%20Plan.pdf>. Hereinafter, the term *DOT* generally refers to both the DOT and the companion SCO.

⁴⁶ SSA, *Occupational Information System Fiscal Year 2011 Research and Development Plan*, pp. 59-60.

⁴⁷ SSA, *Occupational Information System Fiscal Year 2011 Research and Development Plan*, p. 60.

other work that exists in significant numbers in the national economy came to be based on DOT concepts.⁴⁸

Determining Ability to Perform Past Relevant Work

In cases that cannot be decided based on medical factors alone (i.e., those reaching Step 4 of the disability determination process), DDSs (on behalf of SSA) generally first consider whether individuals can still perform their past relevant work (if any). Past relevant work is work that (1) an individual performed within the past five years; (2) was SGA; (3) lasted long enough for the individual to learn to do it⁴⁹; and (4) was not started and stopped in fewer than 30 consecutive days.⁵⁰

Under SSA's regulations, DDSs will find that individuals are not disabled if they can still do any of their past relevant work as they actually performed it or as it is generally performed in the national economy.⁵¹ To do so, the DDS typically compares, on a function-by-function basis, the individual's RFC with the exertional and non-exertional demands of the individual's past relevant work.

According to SSA, when assessing whether individuals can still do their past relevant work as they actually performed it, DDSs primarily consider information supplied by the individuals about that work, such as the duties they performed; the tools, machinery, or equipment they used; and details about the physical, mental, and other requirements of the work they did.⁵² In some cases, the DDS may contact the individual's past employer or another source for additional information.⁵³

SSA's guidance directs a DDS, when determining how an individual's past relevant work is generally performed in the national economy, to use the DOT, or another reliable source of occupational information, to locate the occupational counterpart for each of the individual's past relevant jobs and identify the functional demands of those occupations.⁵⁴ Per SSA, the DDS may also seek information from a vocational specialist or expert about how a particular occupation is usually performed in the national economy.⁵⁵

Under SSA's rules, if the demands of an individual's past relevant work—as actually *or* generally performed—are within the individual's RFC, the DDS should determine that the individual can still perform that work and, thus, is not disabled.⁵⁶ Per SSA's regulations, the DDS determines whether an individual can perform his or her past relevant work without regard to the individual's

⁴⁸ OIADP, *Content Model and Classification Recommendations for the Social Security Administration Occupational Information System*, September 2009, p. 8, <https://web.archive.org/web/20250222071422/https://www.ssa.gov/oidap/Documents/FinalReportRecommendations.pdf>.

⁴⁹ *Long enough to learn to do it* means that the individual performed the job long enough to “learn the techniques, acquire information, and develop the facility needed for average performance in the job,” which “depends on the nature and complexity of the work” and “may be expressed as specific vocational preparation (SVP).” SSA, “SSR 24-2p: Titles II and XVI: How We Evaluate Past Relevant Work,” June 22, 2024, https://www.ssa.gov/OP_Home/rulings/di/02/SSR2024-02-di-02.html.

⁵⁰ 20 C.F.R. §§404.1560(b), 404.1565(a), 416.960(b), and 416.965(a); SSA, “SSR 24-2p: Titles II and XVI.”

⁵¹ 20 C.F.R. §§404.1560(b) and 416.960(b).

⁵² SSA, “SSR 24-2p: Titles II and XVI.”

⁵³ SSA, “SSR 24-2p: Titles II and XVI.”

⁵⁴ SSA, POMS, “DI 25005.025 Past Relevant Work (PRW) as Generally Performed in the National Economy,” January 3, 2025; SSA, “SSR 24-2p: Titles II and XVI.”

⁵⁵ SSA, “SSR 24-2p: Titles II and XVI.”

⁵⁶ 20 C.F.R. §§404.1560(b) and 416.960(b).

vocational factors (i.e., his or her age, education, or work experience) or whether the work exists in significant numbers in the national economy.⁵⁷ If an individual is found unable to perform any of his or her past relevant work as actually or generally performed, the DDS then considers whether the individual can do any other work that exists in significant numbers in the national economy, considering his or her age, education, and work experience (i.e., Step 5).⁵⁸

Determining Ability to Perform Work That Exists in the National Economy

In cases where individuals cannot do their past relevant work (i.e., those reaching Step 5 of the disability determination process), DDSs next determine whether individuals are able to perform any other work that exists in significant numbers in the national economy. To do so, the DDS will consider the individual's RFC—his or her maximum remaining ability to do sustained work activities in an ordinary work setting on a full-time basis—and vocational factors—age, education, and work experience. If the DDS can show, using its medical-vocational guidelines, that an individual's combination of RFC and vocational factors allows him or her to adjust to other work that exists in the national economy, the DDS will determine that the individual is not disabled.⁵⁹

RFC at Step 5

An individual's RFC is a function-by-function assessment of both his or her exertional (i.e., strength-related) *and* nonexertional (i.e., other than strength-related) work capabilities.⁶⁰ At Step 5 of the disability determination process, an individual's RFC is generally expressed in terms of an *exertional* work category (i.e., his or her maximum remaining ability to do sedentary, light, medium, heavy, or very heavy work).⁶¹ Per its regulations, SSA's definitions of *sedentary*, *light*, *medium*, *heavy*, and *very heavy* are based on those in the DOT.⁶² **Table 2** is reproduced from SSA's policy manual and shows the general lifting and carrying requirements of work at each exertional level as specified in SSA's policies and the DOT.⁶³ According to SSA's policies, for the DDS to determine that an individual can do the full range of work at a given exertional level, the individual must be able to perform "substantially all" of both the exertional *and* the nonexertional (e.g., mental, environmental) work functions required in jobs at that level considering the limitations and restrictions caused by his or her impairment.⁶⁴ Individuals determined capable of performing the exertional requirements of work at a given level are also presumed able to

⁵⁷ 20 C.F.R. §§404.1560(b) and 416.960(b).

⁵⁸ 20 C.F.R. §§404.1560(c) and 416.960(c). In certain cases, SSA will determine whether individuals are able to adjust to other work under an expedited process that does not consider their ability to perform their past relevant work. See 20 C.F.R. §§404.1520(h) and 416.920(h).

⁵⁹ 20 C.F.R. §§404.1560(c) and 416.960(c).

⁶⁰ SSA, "SSR 96-8p: Policy Interpretation Ruling Titles II and XVI."

⁶¹ Appendix 2 to Subpart P of Part 404, 20 C.F.R., and SSA, "SSR 96-8p: Policy Interpretation Ruling Titles II and XVI."

⁶² 20 C.F.R. §§404.1567, 404.1569a, 416.967, and 416.969a; SSA, POMS, "DI 25001.001 Medical and Vocational Quick Reference Guide," January 3, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0425001001>.

⁶³ SSA, POMS, "DI 25001.001 Medical and Vocational Quick Reference Guide."

⁶⁴ SSA, "SSR 96-8p: Policy Interpretation Ruling Titles II and XVI."

perform the exertional requirements of work at any lower levels.⁶⁵ For example, an individual determined able to do medium work is also assumed able to do light work and sedentary work.⁶⁶

Table 2. Limits of Weights Lifted or Carried or of Force Exerted by Exertional Level
In Pounds

Exertional Level	Occasionally	Frequently	Constantly
Sedentary	* to 10	*	N/A
Light	* to 20	* to 10	*
Medium	20 to 50	10 to 25	* to 10
Heavy	50 to 100	25 to 50	10 to 20
Very Heavy	100 and over	50 and over	20 and over

Source: CRS reproduced from SSA, POMS, “DI 25001.001 Medical and Vocational Quick Reference Guide,” January 3, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0425001001>. Also see 20 C.F.R. §§404.1567 and 416.967 and DOL, *Dictionary of Occupational Titles* (4th Ed., Rev. 1991)—Appendix C, available at <https://www.dol.gov/agencies/oalj/PUBLIC/DOT/REFERENCES/DOTAPPC>.

Notes: * = negligible weight; N/A = not applicable.

Vocational Factors

In combination with an individual’s RFC, SSA considers the individual’s vocational factors of age, education, and work experience when determining whether he or she can adjust to other work that exists in the national economy.

Age is an individual’s chronological age. In general, SSA considers that as individuals age, they are increasingly limited in their ability to adjust to other work. SSA’s regulations specify three age categories⁶⁷:

1. *Younger person.* A younger person is under age 50. According to SSA, age generally does not influence a younger person’s ability to adjust to other work.⁶⁸
2. *Person closely approaching advanced age.* A person closely approaching advanced age is age 50-54. At these ages, SSA considers whether the individual’s age, in combination with other factors, may significantly affect his or her ability to adjust to other work.
3. *Person of advanced age.* A person of advanced age is age 55 or older. Under SSA’s regulations, being of advanced age significantly limits an individual’s ability to adjust to other work.

⁶⁵ Appendix 2 to Subpart P of Part 404, 20 C.F.R.

⁶⁶ SSA, “SSR 96-8p: Policy Interpretation Ruling Titles II and XVI.”

⁶⁷ 20 C.F.R. §§404.1563 and 416.963 and SSA, POMS, “DI 25015.005 Age as a Vocational Factor,” December 14, 2023, <https://secure.ssa.gov/poms.nsf/lnx/0425015005>.

⁶⁸ Exceptions apply for individuals ages 45-49. See SSA, POMS, “DI 25015.005 Age as a Vocational Factor.”

Education is “formal schooling or other training which contributes to [an individual’s] ability to meet vocational requirements” of work.⁶⁹ SSA’s regulations and policies specify four primary education categories⁷⁰:

1. *Illiteracy*. SSA generally considers individuals to be illiterate if they cannot read or write a simple message in any language.
2. *Marginal education*. SSA considers individuals to have marginal education if they have completed formal schooling in any country at a sixth-grade level or below.
3. *Limited education*. SSA considers individuals to have limited education if they have completed formal schooling in any country at a seventh- through eleventh-grade level.
4. *High school education or above*. SSA considers individuals to have high school education or above if they have completed formal schooling in any country at a twelfth-grade level or above. SSA may also consider whether certain older individuals with a high school education or above have recently completed education that provides for direct entry into skilled or semiskilled work.

Work experience is the skills and abilities that individuals have gained from their past relevant work that indicate the type of work that they may be expected to adjust to.⁷¹ The skill level of work is related to the SVP measures found in the DOT.⁷² *SVP* is a numeric scale corresponding to how long it takes a typical worker to develop the skills needed for average performance in an occupation. Occupations with an SVP of one require a “short demonstration only,” while those with an SVP of nine require “over 10 years.”⁷³ For example, the previously discussed DOT title of administrative clerk had an SVP of 4, meaning it would require “over 3 months up to and including 6 months” for a typical worker to attain average performance in that occupation. SSA’s policies specify four categories of work experience⁷⁴:

1. *No work experience*. SSA considers individuals to have no work experience if they have no past relevant work experience.
2. *Unskilled work experience*. Under SSA’s regulations and policies, unskilled work experience consists of simple duties that require little to no judgment and can be learned on the job in 30 days or less (i.e., work with an SVP of one or two).
3. *Semiskilled or skilled work experience with no transferable skills*. Semiskilled work experience requires some skills, does not require complex duties, and takes one to six months to learn (i.e., work with an SVP of three or four). Skilled work experience consists of skilled job functions, requires “good” cognitive functioning, and takes over six months to learn (i.e., work with an SVP of five to nine). SSA may also evaluate whether individuals with semiskilled or skilled work experience have acquired transferable skills that they can apply in other

⁶⁹ 20 C.F.R. §§404.1564 and 416.964.

⁷⁰ 20 C.F.R. §§404.1564 and 416.964 and SSA, POMS, “DI 25015.010 Education as a Vocational Factor,” August 6, 2020, <https://secure.ssa.gov/poms.nsf/lnx/0425015010>.

⁷¹ 20 C.F.R. §§404.1565 and 416.965.

⁷² SSA, POMS, “DI 25015.015 Work Experience as a Vocational Factor,” July 5, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425015015>.

⁷³ DOL, *Dictionary of Occupational Titles*, Appendix C.

⁷⁴ 20 C.F.R. §§404.1568 and 416.968; SSA, POMS, “DI 25015.015 Work Experience as a Vocational Factor”; SSA, POMS, “DI 25001.001 Medical and Vocational Quick Reference Guide.”

work. *Transferable skills* are skills resulting from skilled or semiskilled work experience that can be applied in other work that is within an individual's RFC.⁷⁵

4. *Semiskilled or skilled work experience with transferable skills.*

Table 3 summarizes the vocational factors that are considered in SSA's disability determination process.

Table 3. Vocational Factors Considered in SSA Disability Determinations

Factor	Categories	Description
Age	Advanced age ^a	Age 55 or older
	Closely approaching advanced age	Ages 50-54
	Younger ^b	Under age 50
Education ^c	Illiteracy	Cannot read or write a simple message
	Marginal	6 th grade level or below
	Limited	7 th -11 th grade level
	High school or above	12 th grade level or above
Work Experience ^d	None	No past relevant work experience
	Unskilled	Consists of simple duties requiring little to no judgment that can be learned on the job in 30 days or less
	Semiskilled or skilled with no transferable skills	Semiskilled work requires some skills, does not require complex duties, and takes 1-6 months to learn; skilled work consists of skilled job functions, requires good cognitive functioning, and takes over 6 months to learn
	Semiskilled or skilled with transferable skills	Transferable skills result from skilled or semiskilled past relevant work that can be applied in other work within the individual's RFC

Source: Appendix 2 to Subpart P of Part 404, 20 C.F.R.; SSA, POMS, "DI 25001.001 Medical and Vocational Quick Reference Guide," January 3, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0425001001>.

Notes:

- SSA has special rules for individuals who are closely approaching retirement age (age 60 or older) and individuals who are age 65 and older. See 20 C.F.R. §§404.1563(e), 404.1568(d)(4), 416.963(e), and 416.968(d)(4) and SSA, POMS, "DI 25015.025 Evaluation of Disability and Blindness in Initial Claims for Individuals Aged 65 or Older—SSR 03-3p," June 26, 2020, <https://secure.ssa.gov/apps10/poms.nsf/lnx/0425015025>.
- In some cases, SSA may find that age is a more limiting factor for younger individuals who are ages 45-49. See 20 C.F.R. §§404.1563(c) and 404.963(c).
- Following a 2019 final rule, SSA no longer considers inability to communicate in English when determining an individual's education level. For example, under SSA's regulations, individuals are considered illiterate if they are unable to read or write a simple message in *any language*, are considered to have marginal education if they have completed formal schooling at a sixth-grade level or below in *any country*, and so on.
- SSA considers work experience from past relevant work. Past relevant work is work that (1) was done within the past five years, (2) was substantial gainful activity, (3) was done long enough for the individual to learn to do it, and (4) was not started and stopped in fewer than 30 calendar days. SSA used to consider

⁷⁵ 20 C.F.R. §§404.1568 and 416.968; SSA, POMS, "DI 25015.017 Transferability of Skills Assessment Policy," November 17, 2023, <https://secure.ssa.gov/poms.nsf/lnx/0425015017>.

past relevant work to be work that an individual did within the past 15 years until a rule change, which took effect on June 22, 2024, shortened the lookback period to five years and added the 30-day minimum requirement. See SSA, "Intermediate Improvement to the Disability Adjudication Process, Including How We Consider Past Work," 89 *Federal Register* 27653, April 18, 2024, <https://www.federalregister.gov/d/2024-08150>; and SSA, "Intermediate Improvement to the Disability Adjudication Process, Including How We Consider Past Work," 89 *Federal Register* 48138, June 5, 2024, <https://www.federalregister.gov/d/2024-12285>.

The Medical-Vocational Guidelines

To make determinations about whether individuals are functionally and vocationally able to do any other work that exists in significant numbers in the national economy, the DDS applies the medical-vocational guidelines specified in SSA's regulations. The medical-vocational guidelines were established in a 1978 SSA rulemaking to help ensure the "soundness and consistency" of disability determinations involving vocational considerations.⁷⁶ The guidelines consist of the grids and guidance on an individual's ability to adjust to other work (i.e., when the grids serve as a framework).⁷⁷ They are based on the third edition of the DOT and the SCO supplement, both of which were published in the 1960s.⁷⁸

The Grids

SSA's grids contain rules specifying certain age, education, and work experience combinations (i.e., vocational factor combinations) for selected *exertional* RFCs that direct determinations of disability.⁷⁹ When the grids *direct* a determination, it means that they support a conclusion as to whether a significant number of jobs (in one or more occupations) exist that the individual can adjust to given his or her vocational factors and RFC.⁸⁰ In other words, for an individual with a combination of vocational factors and exertional abilities that exactly matches one of the grid rules, the grids will determine whether there are a significant number of jobs in the national economy that the individual can perform and, thus, whether he or she is disabled.

Three separate grids exist to evaluate individuals whose exertional RFCs are limited to (1) sedentary work, (2) light work, and (3) medium work. Each individual grid contains various numbered rules. Each of the numbered rules within a given grid specifies a combination of age, education, and work experience and a corresponding "decision" of disabled or not disabled based on that combination.⁸¹

In general, under SSA's rules, older individuals who have little education and work experience are more likely to be awarded benefits than are younger individuals or those who have more education or work experience. For example, under rule 201.01, the grids direct a determination of *disabled* for an individual whose RFC is limited to sedentary work and who is of advanced age,

⁷⁶ SSA, "Rules for Adjudicating Disability Claims in Which Vocational Factors Must Be Considered," 43 *Federal Register* 55349, November 28, 1978, https://archives.federalregister.gov/issue_slice/1978/11/28/55346-55381.pdf.

⁷⁷ SSA, POMS, "DI 25025.001 The Medical-Vocational Guidelines," March 6, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025001>. For more information on the Medical-Vocational Guidelines see also SSA, *Vocational Expert Handbook*, pp. 26-31.

⁷⁸ 20 C.F.R. §§404.1569 and 416.969. See also SSA, "Rules for Adjudicating Disability Claims in Which Vocational Factors Must Be Considered," p. 55352; and OIDAP, *Content Model and Classification Recommendations*, p. 8.

⁷⁹ Appendix 2 to Subpart P of Part 404, 20 C.F.R. The grids do not specify every possible combination of exertional RFC and vocational factors.

⁸⁰ Appendix 2 to Subpart P of Part 404, 20 C.F.R., and SSA, POMS, "DI 25025.001 The Medical-Vocational Guidelines."

⁸¹ Appendix 2 to Subpart P of Part 404, 20 C.F.R., and SSA, POMS, "DI 25025.001 The Medical-Vocational Guidelines."

has limited or less education, and has unskilled or no work experience. In contrast, under rule 201.03, the grids direct a determination of *not disabled* for an individual whose RFC is limited to sedentary work and who is of advanced age, has limited or less education, and has skilled or semiskilled work experience and transferable skills. Under rule 201.23, the grids also direct a determination of *not disabled* for an individual whose RFC is limited to sedentary work and who is age 18-44, is illiterate, and has unskilled or no work experience (Table 4).⁸²

Table 4. Selected Medical-Vocational Grid Rules Used in SSA Adult Disability Determinations

Rule	Residual Functional Capacity	Age	Education	Previous Work Experience	Decision
201.01	Sedentary work ^a	Advanced age (55 or older)	Limited ^b or less	Unskilled ^c or none	Disabled
201.03	Sedentary work	Advanced age (55 or older)	Limited or less	Skilled or semiskilled—skills transferable ^d	Not disabled
201.23	Sedentary work	Younger (age 18-44)	Illiterate ^e	Unskilled or none	Not disabled

Source: CRS based on Table I in Appendix 2 to Subpart P of Part 404, 20 C.F.R.

Notes:

- a. Sedentary work involves occasionally lifting no more than 10 pounds at once and mostly involves sitting, though it may occasionally require walking and standing. See 20 C.F.R. §§404.1567 and 416.967 and SSA, POMS, “DI 25001.001 Medical and Vocational Quick Reference Guide,” January 3, 2025, <https://secure.ssa.gov/poms.nsf/lnx/0425001001>.
- b. *Limited education* generally means that an individual has completed formal schooling in any country at a 7th-11th grade level. See 20 C.F.R. §§404.1564 and 416.964 and SSA, POMS, “DI 25015.010 Education as a Vocational Factor,” August 6, 2020, <https://secure.ssa.gov/poms.nsf/lnx/0425015010>.
- c. Unskilled work experience consists of simple duties that require little to no judgment and can be learned on the job in 30 days or less. See 20 C.F.R. §§404.1568 and 416.968 and SSA, POMS, “DI 25001.001 Medical and Vocational Quick Reference Guide.”
- d. Semiskilled work experience requires some skills, does not require complex duties, and takes one to six months to learn. Skilled work experience consists of skilled job functions, requires “good” cognitive functioning, and takes over six months to learn. Transferable skills result from skilled or semiskilled work experience that can be applied in other work within an individual’s residual functional capacity. See 20 C.F.R. §§404.1568 and 416.968; SSA, POMS, “DI 25015.015 Work Experience as Vocational Factor,” July 5, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425015015>; and SSA, POMS, “DI 25015.017 Transferability of Skills Assessment Policy,” November 17, 2023, <https://secure.ssa.gov/poms.nsf/lnx/0425015017>.
- e. *Illiterate* means that an individual is unable to read or write a simple message in any language. See 20 C.F.R. §§404.1564 and 416.964, and SSA, POMS, “DI 25015.010 Education as a Vocational Factor.”

SSA’s regulations recognize that a certain number of unskilled occupations exist at each of the three exertional levels addressed in the grids, with each occupation consisting of many jobs in the national economy. The number of *unskilled* occupations determined to exist at a given exertional level is considered the occupational base. SSA recognizes about 200 unskilled sedentary occupations; 1,600 unskilled light and sedentary occupations; and 2,500 medium, light, and sedentary unskilled occupations in the national economy.⁸³ These unskilled occupation numbers

⁸² Appendix 2 to Subpart P of Part 404, 20 C.F.R.

⁸³ Appendix 2 to Subpart P of Part 404, 20 C.F.R.

were based on the SOC supplement to the third edition of the DOT, which was published in 1966.⁸⁴ The occupational base for an individual with a given exertional RFC may be widened or narrowed after considering the individual's vocational factors. When the grids direct a determination of *not disabled*, it means that according to SSA, the occupational base is sufficiently large to allow the individual to adjust to other work—that is, a significant number of jobs exists in the national economy that the individual can perform given his or her RFC, age, education, and work experience.⁸⁵

Because grid rules do not exist for every possible combination of RFC and vocational factors, they do not direct a determination in every case. For example, the grids generally cannot direct determinations for individuals who are not capable of performing the full range of work at a given exertional level (i.e., whose RFC is between levels) or for individuals with only nonexertional limitations.⁸⁶

The Grids as a Framework

When an individual's functional and vocational criteria do not exactly match a grid rule and, thus, no specific grid rule directs a determination, the grids instead serve as a *framework* to guide decisionmaking, along with SSA's regulations and policies.⁸⁷ For example, the DDS may need to use the grids as a framework if an individual's RFC indicates that he or she cannot perform the full range of work at a given exertional level specified in the rules (i.e., his or her RFC is between levels). Because the individual's functional criteria would not exactly match a grid rule in such a case, per SSA's regulations, the DDS cannot use the grids to direct a determination.⁸⁸

Additionally, because the grids are expressed only in terms of exertional capabilities, they do not direct determinations for individuals with impairments that cause only nonexertional limitations. In the latter cases, the grids are used as a framework for making individualized determinations. According to SSA's policies, the grids are used as a framework more often than they are used to direct a determination.⁸⁹

When the grids are used as a framework, SSA's rules do not specify whether a significant number of jobs exists that the individual is functionally and vocationally able to do. According to SSA's policies, in such a framework decision the DDS can generally show that an individual can adjust to other work (and therefore, is not disabled) by citing three non-isolated occupations that the individual could do given his or her RFC, age, education, and work experience.⁹⁰ Isolated

⁸⁴ Appendix 2 to Subpart P of Part 404, 20 C.F.R., and SSA, "Rules for Adjudicating Disability Claims in Which Vocational Factors Must be Considered," 43 *Federal Register* 55349, November 28, 1978, p. 55352, https://archives.federalregister.gov/issue_slice/1978/11/28/55346-55381.pdf.

⁸⁵ Appendix 2 to Subpart P of Part 404, 20 C.F.R.; SSA, "SSR 83-10: Titles II and XVI: Determining Capability to do Other Work—The Medical-Vocational Rules of Appendix 2," https://www.ssa.gov/OP_Home/rulings/di/02/SSR83-10-di-02.html; SSA, POMS, "DI 25025.005 Using the Medical-Vocational Guidelines," June 21, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025005>.

⁸⁶ Appendix 2 to Subpart P of Part 404, 20 C.F.R. In cases where individuals have impairments that result in both exertional and nonexertional limitations, the grids are generally used as a framework unless a grid rule directs a determination of disabled based on the individual's exertional limitations alone. See 20 C.F.R. §§404.1569a(d) and 416.969a(d), and SSA, POMS, "DI 25025.020 Applying the Medical-Vocational Rules When the Claimant Has Exertional and Nonexertional Limitations," March 6, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025020>.

⁸⁷ SSA, POMS, "DI 25025.005 Using the Medical-Vocational Guidelines"; and SSA, POMS, "DI. 25025.030 Support for a Framework 'Not Disabled' Determination," January 2, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025030>.

⁸⁸ Appendix 2 to Subpart P of Part 404, 20 C.F.R.

⁸⁹ SSA, POMS, "DI 25025.005 Using the Medical-Vocational Guidelines."

⁹⁰ SSA, POMS, "DI. 25025.030 Support for a Framework 'Not Disabled' Determination." Under certain circumstances, (continued...)

occupations are those containing jobs that “exist only in very limited numbers in relatively few locations outside of the region” where the individual lives.⁹¹ SSA considers the DOT to be a reliable source for determining occupations that exist in the national economy and their requirements, along with certain other sources.⁹² SSA may also seek the expertise of vocational specialists or experts in determining work that individuals with particular functional capabilities could perform or other vocational issues.⁹³ Under SSA’s policy guidance, if the DDS relies on certain DOT occupations to support a framework determination that an individual is not disabled, the DDS is directed to obtain supporting evidence from a vocational specialist.⁹⁴

Table 5 illustrates when SSA’s grid rules direct a determination and when they instead serve as a framework for an individualized determination.

Table 5. Applicability of SSA’s Grid Rules in Adult Initial Disability Claims

If...	Then...
<ul style="list-style-type: none"> The individual's impairment causes only exertional limitations or restrictions AND The individual's combination of exertional RFC and vocational factors (i.e., age, education, work experience) exactly matches a grid rule 	The grids direct a determination of disabled or not disabled for that individual.
<ul style="list-style-type: none"> The individual's impairment causes only nonexertional limitations or restrictions OR The individual's impairment causes a combination of exertional and nonexertional limitations or restrictions^a OR The individual's RFC is between exertional levels OR The individual's combination of RFC and vocational factors do not exactly match a grid rule 	The grids are used as a framework along with SSA's regulations and policies to make an individualized determination of disabled or not disabled for that individual.

Source: Appendix 2 to Subpart P of Part 404, 20 C.F.R.; SSA, POMS, “DI 25025.005 Using the Medical-Vocational Guidelines,” June 21, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025005>; SSA, POMS, “DI 25025.010 Using Rule 204.00 as a Framework for a Determination,” March 6, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025010>.

Notes:

- a. In cases where an individual has both exertional and nonexertional limitations, the grids are generally used as a framework unless a grid rule applies that directs a determination of disabled based on the individual’s

SSA’s policies specify other ways that a DDS can support a framework determination that an individual can do other work, such as by citing an applicable Social Security ruling.

⁹¹ 20 C.F.R. §§404.1566(b) and 416.966(b) and SSA, “Isolated Occupations We Will Not Use to Support a ‘Not Disabled’ Finding at Step Five of the Sequential Evaluation Process,” June 22, 2024, <https://secure.ssa.gov/apps10/reference.nsf/links/06212024021759PM>.

⁹² 20 C.F.R. §§404.1566 and 416.966.

⁹³ 20 C.F.R. §§404.1566 and 416.966; SSA, POMS, “DI 25003.001 Vocational Specialists”; SSA, “SSR 24-3p: Titles II and XVI: Use of Occupational Information and Vocational Specialist and Vocational Expert Evidence in Disability Determinations and Decisions,” January 6, 2025, https://www.ssa.gov/OP_Home/rulings/di/02/SSR2024-03-di-02.html; SSA, “Social Security Ruling 24-3P: Use of Occupational Information and Vocational Specialist and Vocational Expert Evidence in Disability Determinations and Decisions: Reference Materials,” https://www.ssa.gov/appeals/public_experts/SSR_24-3p.pdf.

⁹⁴ SSA, “Guidance Regarding the Citation of Certain Occupations at Step Five of the Sequential Evaluation Process,” January 6, 2025, <https://secure.ssa.gov/apps10/reference.nsf/links/01062025092030AM>.

exertional limitations alone. See 20 C.F.R. §§404.1569a(d) and 416.969a(d) and SSA, POMS, “DI 25025.020 Applying the Medical-Vocational Rules When the Claimant Has Exertional and Nonexertional Limitations,” March 6, 2024, <https://secure.ssa.gov/poms.nsf/lnx/0425025020>.

Concerns Raised About SSA's Continued Reliance on the DOT for Disability Evaluation

Congress, courts, and others have raised concerns about SSA's continued reliance on the DOT when evaluating disability.⁹⁵

First, some have raised concerns that the occupational information in the DOT does not reflect the current U.S. labor market. DOL replaced the DOT with a new database of occupational information in 1998—the Occupational Information Network (O*NET)—and no longer updates the DOT.⁹⁶ Some occupations in the DOT were most recently updated in 1991, but most of the occupations were last updated in 1977.⁹⁷ A BLS publication notes that the DOT “emerged in an industrial economy and emphasized blue-collar jobs” and “its usefulness waned as the economy shifted toward information and services and away from heavy industry.”⁹⁸ A 2012 Senate report expressed concern that disability benefits were being awarded based on outdated DOT information that “does not reflect current labor market trends or jobs in the national economy.”⁹⁹ The DOT includes occupations that SSA considers to no longer exist in significant numbers (i.e., isolated occupations) and may not include other occupations that do exist today. Moreover, the occupational descriptions in the DOT may not reflect the requirements and demands of occupations as they are currently performed. In June 2024, SSA identified 114 of the over 12,000 DOT occupations to be isolated and therefore to not exist in significant numbers in the U.S. economy.¹⁰⁰ For example, SSA now considers the DOT occupations of photoradio operator (DOT Code 193.362-010), embalmer apprentice (DOT Code 338.371-010), and reptile farmer (DOT Code 413.161-014) to be isolated.¹⁰¹ Around the same time, SSA identified another 13 DOT

⁹⁵ For example, see U.S. Congress, Senate Committee on Homeland Security and Governmental Affairs, Permanent Subcommittee on Investigations, *Social Security Disability Programs: Improving the Quality of Benefit Award Decisions*, Minority Staff Report, 112th Cong., 2nd sess., September 13, 2012, p. 95, <https://www.govinfo.gov/content/pkg/CHRG-112shrg76068/pdf/CHRG-112shrg76068.pdf#page=103>; OIGAP, *Content Model and Classification Recommendations for the Social Security Administration*, pp. 15-23; SSA, Office of Inspector General (OIG), *The Social Security Administration's Efforts to Develop Its Own Source of Occupational Information for Use in Its Disability Programs*, June 2018, p. 3, <https://oig-files.ssa.gov/audits/full/A-01-15-15035.pdf>; and Kevin Liebkemann, “Job Incidence Numbers in Social Security Disability Claims: A Case Study and Analysis,” *Journal of the National Association of Administrative Law Judiciary*, vol. 44, no. 2 (May 15, 2024), p. 26 and footnote 47, <https://digitalcommons.pepperdine.edu/cgi/viewcontent.cgi?article=1718&context=naalj>.

⁹⁶ DOL, “Status of the Dictionary of Occupational Titles; Use in Social Security Disability Adjudications,” <https://www.dol.gov/agencies/oalj/topics/libdot>.

⁹⁷ Less than 20% of DOT occupations were updated in 1991. See U.S. Government Accountability Office (GAO), *Modernized SSA Disability Programs: Progress Made, but Key Efforts Warrant More Management Focus*, GAO-12-420, June 2012, p. 6, footnote 14, <https://www.gao.gov/assets/gao-12-420.pdf>.

⁹⁸ Matthew Mariani, “Replace with a Database: O*NET Replaces the DOT,” *Occupational Outlook Quarterly*, Spring 1999, p. 3, <https://www.bls.gov/careeroutlook/1999/Spring/art01.pdf>.

⁹⁹ U.S. Congress, Senate Committee on Homeland Security and Governmental Affairs, Permanent Subcommittee on Investigations, *Social Security Disability Programs: Improving the Quality of Benefit Award Decisions*, Minority Staff Report, 112th Cong., 2nd sess., September 13, 2012, p. 95, <https://www.govinfo.gov/content/pkg/CHRG-112shrg76068/pdf/CHRG-112shrg76068.pdf#page=103>.

¹⁰⁰ SSA, “Social Security Updates Occupations List Used in Disability Evaluation Process,” press release, June 24, 2024, <https://www.ssa.gov/news/press/releases/2024/#6-2024-2>.

¹⁰¹ SSA, “Isolated Occupations We Will Not Use to Support a ‘Not Disabled’ Finding at Step Five of the Sequential Evaluation Process.”

occupations “whose continued widespread existence multiple courts have questioned” and therefore are now subject to “heightened evidentiary and articulation requirements” if used to support a framework decision that an individual is not disabled.¹⁰² Examples of these DOT occupations are addresser (DOT Code 209.587-101), cutter-and-paster (DOT Code 249.587-014), and nut sorter (DOT Code 521.687-086).¹⁰³

Second, the DOT was originally designed as a job placement tool, and, as such, some have raised concerns that it does not contain all the information SSA may need for disability adjudication.¹⁰⁴ For example, the DOT does not contain information on certain nonexertional requirements of occupations (e.g., mental and cognitive demands). Given the changing nature of work, an independent advisory panel chartered by SSA in 2008 noted the increasing importance of capturing information on the mental and cognitive demands of occupations to “reduce adjudicative judgment” in SSA disability evaluation.¹⁰⁵

Third, some have raised concerns that the DOT does not easily crosswalk to other federal occupational sources that contain more updated occupational information or job numbers. Federal statistical agencies that publish occupational data do not use DOT codes. Instead, these agencies use the federally mandated Standard Occupational Classification (SOC) system to classify workers and jobs into occupational categories. The SOC system classifies jobs in a more aggregated manner than the DOT does—there are 867 SOC codes, compared to over 12,000 DOT codes.¹⁰⁶ In other words, a single SOC code may contain several DOT codes, and thus information reported by SOC code (e.g., employment estimates) cannot be directly applied to DOT codes. SSA does not specify an approach that adjudicators should use to estimate the number of jobs that exist within a particular DOT code.¹⁰⁷ And though SSA has recently identified certain DOT occupations that it considers isolated, it does not otherwise define a threshold for what constitutes a significant number of jobs.¹⁰⁸ Some courts have previously considered whether job numbers cited by SSA for a given DOT code are credible or if they represent a significant number of jobs based on which to deny disability benefits.¹⁰⁹

¹⁰² SSA, “Guidance Regarding the Citation of Certain Occupations at Step Five of the Sequential Evaluation Process.”

¹⁰³ SSA, “Guidance Regarding the Citation of Certain Occupations at Step Five of the Sequential Evaluation Process.”

¹⁰⁴ DOL, *Dictionary of Occupational Titles (4th Ed., Rev. 1991) – Appendix D*, available at <https://www.dol.gov/agencies/oalj/PUBLIC/DOT/REFERENCES/DOTAPPD>, and OIADP, *Content Model and Classification Recommendations for the Social Security Administration*, pp. 15-23.

¹⁰⁵ OIADP, *Content Model and Classification Recommendations for the Social Security Administration*, p. 40.

¹⁰⁶ U.S. Bureau of Labor Statistics (BLS), “Standard Occupational Classification,” <https://www.bls.gov/soc/>.

¹⁰⁷ SSA, “SSR 24-3p: Titles II and XVI: Use of Occupational Information and Vocational Specialist and Vocational Expert Evidence in Disability Determinations and Decisions,” January 6, 2025, https://www.ssa.gov/OP_Home/rulings/di/02/SSR2024-03-di-02.html; and SSA, “Guidelines for Using Occupational Information in Electronic Tools,” January 6, 2025, <https://secure.ssa.gov/apps10/reference.nsf/links/01062025085235AM>.

¹⁰⁸ SSA, “Isolated Occupations We Will Not Use to Support a ‘Not Disabled’ Finding at Step Five of the Sequential Evaluation Process”; SSA, “SSR 24-3p: Titles II and XVI”; SSA, “Guidelines for Using Occupational Information in Electronic Tools”; SSA, Office of Hearings Operations, Office of the Chief Administrative Law Judge, *Vocational Expert Handbook*, p. 44.

¹⁰⁹ SSA, OIG, *The Social Security Administration’s Efforts to Develop Its Own Source*, p. 3; and Liebkemann, “Job Incidence Numbers in Social Security Disability Claims,” p. 26 and footnote 47.

SSA's Occupational Information System (OIS) Project

SSA undertook the OIS project to develop a new, tailored source of updated occupational information that would satisfy its legal, programmatic, and technical requirements.¹¹⁰

SSA had previously explored whether existing occupational sources could replace the DOT for disability evaluation. SSA assessed whether it could adopt the O*NET in disability evaluations but determined that the O*NET did not meet SSA's adjudicative needs.¹¹¹ For example, O*NET did not provide sufficiently detailed information about the physical demands of occupations or any information about the mental demands of occupations.¹¹² SSA further concluded that other existing occupational information systems would also not provide enough information for its disability determination purposes.¹¹³

At the outset of the OIS project in 2008, SSA chartered an independent Occupational Information Development Advisory Panel (OIDAP) to make recommendations “regarding the type of occupational information that SSA should collect and the manner in which occupations should be grouped that best serves disability evaluation.”¹¹⁴ OIDAP made a series of recommendations, including the following:

The creation of a new occupational information system is needed to replace the [DOT] for SSA's disability adjudication system. The OIS must include: a) occupations aggregated at a level to support individualized disability assessment; b) a cross-walk to the [SOC]; c) precise occupationally-specific data; d) core work activities; e) minimum levels of requirements needed to perform work; f) observable and deconstructed measures; g) a manageable number of data elements; h) sampling methodology capturing the full range of work; i) inter-rater agreement justifying data inference; j) data collection of high quality data; k) valid, accurate, and reproducible data; l) whether core work activities could be performed in alternative ways; and, m) terminology that is consistent with medical practice and human function.¹¹⁵

In 2011, SSA outlined its approach for a new OIS with a staged rollout initially anticipated in FY2016.¹¹⁶ In FY2012, SSA entered into an interagency agreement with BLS to test whether BLS

¹¹⁰ SSA, *Social Security Administration's Legal, Program, and Technical/Data Occupational Information Requirements*, February 2009, p. 2, <https://web.archive.org/web/20170829021115/https://www.ssa.gov/oidap/Documents/WEBFORMATED-081009—SSA%20Legal%20Program%20and%20Technical%20Data.pdf>.

¹¹¹ Nancy T. Tippins and Margaret L. Hilton, eds., *A Database for a Changing Economy: Review of the Occupational Information Network (O*NET)* (National Academies Press, 2010), p. 160, <https://nap.nationalacademies.org/catalog/12814/a-database-for-a-changing-economy-review-of-the-occupational-information-network>; SSA, OIG, *Job Information Used in the Social Security Administration's Disability Claims Adjudication Process*, November 2010, pp. 3-4, https://oig-files.ssa.gov/audits/full/A-01-10-21024_7.pdf; SSA, Responses to Questions for the Record, U.S. House of Representatives, Committee on Appropriations, Subcommittee on the Departments of Labor, Health, and Human Services, Education, and Related Agencies, Hearing on “Departments of Labor, Health, and Human Services, Education, and Related Agencies Appropriations for 2011, 111th Cong., 2nd Sess., March 4, 2010, pp. 450-451, <https://www.govinfo.gov/content/pkg/CHRG-111hhrg58234/pdf/CHRG-111hhrg58234.pdf>.

¹¹² SSA, “Occupational Information System Project FAQ's”; and GAO, *SSA Disability Programs: Fully Updating Disability Criteria Has Implications for Program Design*, GAO-02-919T, July 11, 2002, p. 11, <https://www.gao.gov/assets/gao-02-919t.pdf>.

¹¹³ SSA, *Occupational Information System Fiscal Year 2011 Research and Development Plan*, footnote 8.

¹¹⁴ OIDAP, *Charter*, January 15, 2009, p. 1, <https://web.archive.org/web/20170826090457/https://www.ssa.gov/oidap/Documents/FINAL—OIDAP%20CHARTER%20COSS%20&%20DATED%20OIDAPCharter.pdf>.

¹¹⁵ OIDAP, *Content Model and Classification Recommendations*, p. 57.

¹¹⁶ SSA, *Occupational Information System Fiscal Year 2011 Research and Development Plan*, p. 53.

could use its National Compensation Survey infrastructure to capture the new occupational information that SSA needed.¹¹⁷ After several years of preliminary testing, BLS began the first year of data collection for the new Occupational Requirements Survey (ORS) in September 2015.¹¹⁸ SSA intends the ORS to be the main source of OIS's information, supplemented by certain data from other sources.¹¹⁹

Occupational Requirements Survey (ORS)

ORS provides SOC-based survey information on occupations in the national economy, including the physical demands; environmental conditions; education, training, and experience requirements; and cognitive and mental requirements of occupations.¹²⁰ ORS is funded by SSA and fielded by BLS.¹²¹

BLS field economists periodically collect ORS occupational data from a sample of public and private sector establishments and occupations.¹²² Each ORS data collection period is referred to as a “wave.” During a wave, multiple annual samples are collected and combined to produce final estimates for the wave. Preliminary ORS estimates on a subset of occupations are generally published each year. As additional annual samples within a wave become available, the preliminary dataset is updated to incorporate the new information. Once all the samples in a wave have been collected and published, the estimates are considered final for that wave.¹²³

Following several years of preliminary testing, BLS began the first wave of ORS data collection in FY2015. The first wave ended in FY2018, and BLS published final data for that wave in FY2019. The first wave of ORS did not include questions about the mental and cognitive requirements of occupations, which SSA and BLS were still developing and testing. BLS began the second wave of ORS data collection in FY2018.¹²⁴

The second wave used an updated sample design to capture requirements for more occupations and included new questions related to the mental and cognitive requirements of occupations. The second wave ended in FY2023, and BLS published final data from that wave in FY2024.¹²⁵

BLS started the third wave of ORS data collection in FY2023 and published preliminary data on a subset of occupations in FY2025. BLS began the third year of data collection for the third wave of ORS in FY2025.¹²⁶ SSA has since collaborated with BLS to extend the third wave of ORS data collection to eight years “to reduce survey administrative costs.”¹²⁷

¹¹⁷ SSA, “Occupational Information System (OIS) Project,” https://www.ssa.gov/disabilityresearch/occupational_info_systems.html?ab=0.

¹¹⁸ SSA, “Occupational Information System (OIS) Project.”

¹¹⁹ SSA, “Occupational Information System (OIS) Project.”

¹²⁰ BLS, “Occupational Requirements Survey: Overview,” <https://www.bls.gov/opub/hom/ors/home.htm>; and BLS, “Classifying Jobs: From the Dictionary of Occupational Titles (DOT) to the Standard Occupational Classification (SOC),” <https://www.bls.gov/ors/factsheet/classifying-jobs.htm>.

¹²¹ BLS, *FY2025 Congressional Budget Justification*, p. 49, <https://www.dol.gov/sites/dolgov/files/general/budget/2025/CBJ-2025-V3-01.pdf>.

¹²² BLS, “Occupational Requirements Survey: Design,” <https://www.bls.gov/opub/hom/ors/design.htm>.

¹²³ BLS, “Occupational Requirements Survey: Presentation,” <https://www.bls.gov/opub/hom/ors/presentation.htm>.

¹²⁴ SSA, “Occupational Information System (OIS) Project.”

¹²⁵ SSA, “Occupational Information System (OIS) Project.”

¹²⁶ SSA, “Occupational Information System (OIS) Project”; and SSA, *Justification of Estimates for Appropriations Committees, FY 2025*, p. 78, <https://www.ssa.gov/budget/assets/materials/2025/FY25-JEAC.pdf>.

¹²⁷ SSA, “Occupational Information System (OIS) Project.”

ORS captures information not previously available from the DOT, such as the mental and cognitive requirements of occupations. Additionally, ORS classifies occupations by SOC code rather than by DOT code, allowing matching to other occupational sources that contain additional SOC-based data that SSA may use in disability evaluation, such as employment estimates. Additionally, BLS plans to regularly update the ORS. In contrast, DOL has not updated the DOT since 1991. **Table 6** compares selected DOT and ORS attributes.

Table 6. Comparison of Selected DOT and ORS Attributes

Attribute	Dictionary of Occupational Titles (DOT)	Occupational Requirements Survey (ORS)
Available Occupational Information	Physical demands, environmental conditions, specific vocational preparation (SVP)	Physical demands, environmental conditions, SVP, cognitive and mental requirements
Occupational Classification System	DOT	Standard Occupational Classification (SOC)
Number of Occupational Groups	Over 12,000 DOT titles	Over 800 SOC codes at the most detailed level; ORS Wave 2 data are available for about 500 of these SOC codes
Job Numbers by Occupational Group	Not directly available, though some federal statistical agencies may produce crosswalks to SOC-based estimates; private companies may also produce estimates using proprietary methods	Number of workers by SOC code is available from the Occupational Employment and Wage Statistics program
Update Schedule	No longer updated; last updated in 1991	Is to be updated on a continuous cycle (i.e., “wave”); preliminary data on a subset of occupations are to be released each year; final wave data are to be released roughly every 5-10 years; preliminary Wave 3 data on a subset of occupations were released in November 2024

Source: CRS based on BLS, “Classifying Jobs: From the Dictionary of Occupational Titles (DOT) to the Standard Occupational Classification (SOC),” <https://www.bls.gov/ors/factsheet/classifying-jobs.htm>; and SSA, “Occupational Information System (OIS) Project,” https://www.ssa.gov/disabilityresearch/occupational_info_systems.html.

Status of OIS

Despite over a decade of work on the project, to date, SSA has not fully implemented the new OIS. According to SSA’s OIS webpage, the initial goal of OIS was to support “current policy with minimal change.”¹²⁸ But SSA later “determined that larger changes to policy would be necessary.”¹²⁹ Because of this, SSA states that to implement the new OIS it first needs (1) second-wave five-year production data from BLS, (2) the Vocational Information Tool (VIT), and (3) new regulations and revised subregulatory guidance.¹³⁰ BLS published final second-wave ORS data in February 2024. The VIT is a web-based platform that SSA has been developing to house

¹²⁸ SSA, “Occupational Information System (OIS) Project.”

¹²⁹ SSA, “Occupational Information System (OIS) Project.”

¹³⁰ SSA, “Occupational Information System (OIS) Project.”

and operationalize occupational information from the ORS and other sources.¹³¹ According to SSA, it paused work on the VIT in FY2021 to develop new vocational policies.¹³² Because the concepts in the DOT form the basis for SSA's existing medical-vocational regulations and policies, to fully implement OIS, SSA would need to revise its regulations and policy guidance to reflect the new ORS information.¹³³

In its FY2025 and FY2026 budget justifications, SSA stated that it would use the second-wave ORS data to conduct an OIS-related rulemaking.¹³⁴ According to a February 2025 Government Accountability Office (GAO) report, SSA "has not prioritized the rule and policy changes [it] says are needed to use updated occupational criteria."¹³⁵ SSA included a planned rulemaking on "Improvements to the Disability Adjudication Process: Sequential Evaluation Process" in the Spring 2025 Unified Agenda, which "includes proposing policy updates to occupational data sources and optimizing their use to serve [its] customers and preserve the trust funds."¹³⁶ As of early December 2025, SSA has not issued proposed rules or publicly disclosed an implementation date for OIS. In the meantime, SSA's regulations continue to recognize the DOT as a reliable source of occupational information. In early 2025, SSA issued a policy interpretation ruling relaxing the requirements for using information from occupational sources other than the DOT in disability evaluation.¹³⁷

Considerations for Congress

Adequacy of Information

Congress may consider seeking more information on the status of the OIS project, such as by holding hearings, submitting letters seeking clarifying information, or requiring SSA to provide reports. For example, OIS came up in at least four separate hearings during the 118th Congress and during numerous other hearings in Congresses before that.¹³⁸ In the past, House and Senate

¹³¹ SSA, "Occupational Information System (OIS) Project."

¹³² SSA, "Fact Sheet: Occupational Information System Project," July 2024, <https://web.archive.org/web/20250320043709/https://www.ssa.gov/disabilityresearch/documents/Fact%20Sheet%20-%20Occupational%20Information%20System%20Project.pdf>. SSA contracted with Northrop Grumman and CGI for VIT development.

¹³³ SSA, *Social Security Administration's Legal, Program, and Technical/Data Occupational Information Requirements*, pp. 4-5.

¹³⁴ SSA, *Justification of Estimates for Appropriations Committees, FY 2025*, p. 78; and SSA, *Justification of Estimates for Appropriations Committees for Fiscal Year 2026*, p. 51, <https://www.ssa.gov/budget/assets/materials/2026/FY26-JEAC.pdf>.

¹³⁵ GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, GAO-25-107743, February 2025, p. 192, <https://www.gao.gov/assets/gao-25-107743.pdf>.

¹³⁶ Regulatory Information Service Center, "Unified Agenda of Federal Regulatory and Deregulatory Actions," Spring 2025, <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=0960-A167>. Recent press reports suggest that SSA may not move forward with this proposed rulemaking. As of the date of this report, SSA has not officially announced any changes to this planned rulemaking.

¹³⁷ SSA, "SSR 24-3p: Titles II and XVI"; SSA, *Vocational Expert Handbook*, p. 44; GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, p. 193.

¹³⁸ For example, see U.S. Congress, Senate Committee on Finance, *Work and Social Security Benefits*, 118th Cong., 2nd sess., June 18, 2024; U.S. Congress, House Committee on Ways and Means, Subcommittee on Social Security and Subcommittee on Work and Welfare, *Social Security Administration*, 118th Cong., 2nd sess., March 21, 2024; U.S. Congress, Senate Committee on Finance, *The President's FY2025 Social Security Administration Budget*, 118th Cong., 2nd sess., March 20, 2024; and U.S. Congress, House Committee on Ways and Means, Subcommittee on Social (continued...)

appropriators have also repeatedly requested that SSA report to Congress on the status of the OIS project and provide a timeline for its expected implementation. S.Rept. 119-55¹³⁹ For example, the Joint Statement of Managers accompanying the Consolidated Appropriations Act of 2012 (P.L. 112-74) directed SSA to report to Congress annually on the status of the OIS project. However, according to a 2025 GAO report, SSA has not submitted such an annual report to Congress since 2022.¹⁴⁰

SSA provides some information on an OIS project page on its website, which currently includes high-level information about OIS's objective and status and a summary of the project's key activities from FY2012 to FY2025.¹⁴¹ Also on that webpage, SSA links to an OIS frequently asked questions webpage.¹⁴² SSA has also previously included some information about the OIS project in its budget justifications.¹⁴³

Project's Costs

In July 2024, SSA stated that since FY2012 it had spent about \$300 million on ORS development and data collection and that from FY2017 to FY2020 it spent \$8.9 million on VIT

Security, *One Million Claims and Growing: Improving Social Security's Disability Adjudication Process*, 118th Cong., 1st sess., October 26, 2023. Also see for example, U.S. Congress, Senate Committee on Homeland Security and Governmental Affairs, *High-Risk List 2019: Recommendations to Reduce Risk of Waste, Fraud, and Mismanagement in Federal Programs*, 116th Cong., 1st sess., March 6, 2019; U.S. Congress, House Committee on Ways and Means, Subcommittee on Social Security, *Examining Changes to Social Security's Disability Appeals Process*, 115th Cong., 2nd sess., July 25, 2018; U.S. Congress, House Committee on Ways and Means, Subcommittee on Social Security, *Lacking a Leader: Challenges Facing the SSA After over 5 Years of Acting Commissioners*, 115th Cong., 2nd sess., March 7, 2018; U.S. Congress, House Committee on Ways and Means, *Determining Eligibility for Disability Benefits: Challenges Facing the Social Security Administration*, 115th Cong., 1st sess., September 6, 2017; U.S. Congress, Joint Economic Committee, *Ensuring Success for the Social Security Disability Insurance Program and Its Beneficiaries*, 114th Cong., 1st sess., November 4, 2015; U.S. Congress, House Committee on Oversight and Government Reform, *Examining Ways the Social Security Administration Can Improve the Disability Review Process*, 113th Cong., 2nd sess., April 9, 2014; U.S. Congress, Committee on Ways and Means, *The Challenges Facing the Next Commissioner of Social Security*, 113th Cong., 1st sess., April 26, 2013; U.S. Congress, House Committee on Ways and Means, *Fifth in a Hearing Series on Securing the Future of the Social Security Disability Insurance Program*, 112th Cong., 2nd sess., September 14, 2012; U.S. Congress, Senate Committee on Homeland Security and Governmental Affairs, Permanent Subcommittee on Investigations, *Social Security Disability Programs: Improving the Quality of Benefit Award Decisions*, 112th Cong., 2nd sess., September 13, 2012; U.S. Congress, Senate Committee on Finance, *The Social Security Administration: Is It Meeting Its Responsibilities to Save Taxpayer Dollars and Serve the Public?*, 112th Cong., 2nd sess., May 17, 2012; and U.S. Congress, House Committee on Ways and Means, *Third in a Hearing Series on Securing the Future of the Social Security Disability Insurance Program*, 112th Cong., 2nd sess., March 20, 2012.

¹³⁹ For example, see SSA, *FY 2019 Congressional Justification*, p. 125, <https://www.ssa.gov/budget/assets/materials/2019/2019CJ.pdf>; SSA, *FY 2020 Congressional Justification*, p. 121, https://www.ssa.gov/budget/assets/materials/2020/FY20-JEAC_2.pdf; SSA, *FY 2021 Congressional Justification*, p. 106, <https://www.ssa.gov/budget/assets/materials/2021/FY21-JEAC.pdf>; SSA, *FY 2022 Congressional Justification*, p. 100, <https://www.ssa.gov/budget/assets/materials/2022/FY22-JEAC.pdf>; SSA, *Justification of Estimates for Appropriations Committees: Fiscal Year 2023*, p. 98, <https://www.ssa.gov/budget/assets/materials/2023/FY23-JEAC.pdf>; SSA, *Justification of Estimates for Appropriations Committees: Fiscal Year 2024*, pp. 100-101, <https://www.ssa.gov/budget/assets/materials/2024/FY24-JEAC.pdf>; SSA, *Justification of Estimates for Appropriations Committees, FY 2025*, pp. 99-100; U.S. House of Representatives, Committee on Appropriations, Joint Explanatory Statement accompanying P.L. 118-47, p. 797, <https://www.congress.gov/118/cprt/HPRT55008/CPRT-118HPRT55008.pdf>; and U.S. Senate, Committee on Appropriations, accompanying S. 2587, p. 337, <https://www.congress.gov/119/crpt/srpt55/CRPT-119srpt55.pdf>.

¹⁴⁰ GAO, *High Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, p. 192. For SSA's FY2022 report, see SSA, *Report on the Occupational Information System Project*, April 13, 2022, <https://www.ssa.gov/legislation/FY2021%20OIS%20Report%20to%20Congress.pdf>.

¹⁴¹ SSA, "Occupational Information System (OIS) Project."

¹⁴² SSA, "Occupational Information System Project FAQ's."

¹⁴³ Available at SSA, "Budget Estimates," <https://www.ssa.gov/budget>.

development.¹⁴⁴ SSA plans to work with BLS to regularly update ORS occupational information in waves to ensure the information remains current. According to a 2018 SSA Office of Inspector General (OIG) report, SSA had estimated that each additional wave of ORS data collection would cost about \$167 million.¹⁴⁵

SSA pays for its OIS activities from funding provided by Congress each year as part of the annual appropriations process.¹⁴⁶ According to the SSA OIG, if SSA's budget "is insufficient to cover all its priorities in any given year, [SSA] might shift the funds from the [OIS] project to its other priorities in that year."¹⁴⁷ The OIG also stated that if "SSA cannot continually update the [OIS], its information will become outdated, like some of the DOT's information."¹⁴⁸

To the extent that Congress views OIS implementation and maintenance as priority workloads for SSA, Congress may consider providing SSA with dedicated funding for these activities in amounts based on SSA's estimated resource needs or what lawmakers deem to be an appropriate level.

Implementation Timeline

Congress has repeatedly inquired about the status of the OIS project and SSA's timeline for using the new OIS in disability determinations. As of early December 2025, SSA has not issued proposed rules or publicly disclosed an implementation date for OIS.¹⁴⁹ SSA included a proposed rulemaking in the Spring 2025 Unified Agenda that would outline how it will use the new occupational information in SSDI and SSI disability determinations.¹⁵⁰ Until SSA implements the new OIS, it continues to use the DOT, which becomes increasingly outdated the longer SSA continues using it.¹⁵¹

Lawmakers may consider enacting OIS implementation requirements. For example, during the 118th Congress, Senator Bill Cassidy and then-Senator Sherrod Brown introduced the Improving Employment Options for DI Beneficiaries Act (S. 2830), which would have required SSA to,

¹⁴⁴ SSA, "Fact Sheet: Occupational Information System Project." Per SSA's FY2026 budget justification, SSA obligated a total of \$307.0 million from FY2012 to FY2024 for OIS and VIT. See SSA, *Justification of Estimates for Appropriations Committees for Fiscal Year 2026*, p. 54. SSA obligated additional funds for OIS in years before FY2012. See U.S. Congress, House Committee on Ways and Means, Subcommittee on Social Security, *Hearing on the Challenges of Achieving Fair and Consistent Disability Decisions*, 113th Cong., 1st sess., March 20, 2013, p. 90, <https://www.govinfo.gov/content/pkg/CHRG-113hhrg89589/pdf/CHRG-113hhrg89589.pdf>. According to SSA, the VIT cost estimate captured the tool's total cost up to that date (July 2024).

¹⁴⁵ SSA, OIG, *SSA's Efforts to Develop Occupational Information*, p. 8.

¹⁴⁶ The development of the OIS and VIT is funded from SSA's research and demonstration budget in the SSI account, while the salaries of SSA employees are typically funded from the agency's general administrative budget in the Limitation on Administrative Expenses account. See SSA, *Justification of Estimates for Appropriations Committees for Fiscal Year 2026*, p. 54; and CRS Report R47097, *Social Security Administration (SSA): Trends in the Annual Limitation on Administrative Expenses (LAE) Appropriation*.

¹⁴⁷ SSA, OIG, *SSA's Efforts to Develop Occupational Information*, p. 10.

¹⁴⁸ SSA, OIG, *SSA's Efforts to Develop Occupational Information*, p. 10.

¹⁴⁹ Regulatory Information Service Center, "Unified Agenda of Federal Regulatory and Deregulatory Actions," Fall 2024, <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202410&RIN=0960-AI67>.

¹⁵⁰ Regulatory Information Service Center, "Unified Agenda of Federal Regulatory and Deregulatory Actions," Spring 2025, <https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=202504&RIN=0960-AI67>. Recent press reports suggest that SSA may not move forward with this proposed rulemaking. As of the date of this report, SSA has not officially announced any changes to this planned rulemaking.

¹⁵¹ SSA, OIG, *SSA's Efforts to Develop Occupational Information*, p. 10.

within one year of the bill's enactment and every three years after that, use updated BLS data to determine jobs that exist in the national economy to make certain SSDI disability determinations.

Implications of OIS Implementation for SSDI and SSI Eligibility

Implementation of SSA's new OIS may change initial or continuing SSDI or SSI eligibility. It is possible that, relative to current regulations, SSA's new OIS may make some individuals less likely to qualify for disability benefits and others more likely to qualify. After OIS implementation, individuals who would have been allowed benefits under current regulations may be denied benefits under SSA's new OIS—for example, because they are unable to do any DOT occupations but are able to do more modern occupations. Others who would have been denied disability benefits under current regulations may be allowed disability benefits under SSA's new OIS—for example, because they can do only DOT occupations that no longer exist in significant numbers in the national economy. Still others may be unaffected by the change—they would have been allowed under both SSA's current regulations and the new OIS or denied under both SSA's current regulations and the new OIS. Overall SSDI and SSI allowances could increase, decrease, or remain unchanged after OIS implementation. Factors potentially influencing any such eligibility changes may include, for example, the changing nature of work, the integration of mental and cognitive demands of occupations into the new OIS, and how SSA chooses to construct its regulations to implement the new OIS. SSA has not made public any estimates of the anticipated effects of OIS implementation on SSDI or SSI eligibility. Congress may seek to further evaluate the potential impact of this planned policy change on disability program participation.

Author Information

Emma K. Tatem
Analyst in Social Policy

Disclaimer

This document was prepared by the Congressional Research Service (CRS). CRS serves as nonpartisan shared staff to congressional committees and Members of Congress. It operates solely at the behest of and under the direction of Congress. Information in a CRS Report should not be relied upon for purposes other than public understanding of information that has been provided by CRS to Members of Congress in connection with CRS's institutional role. CRS Reports, as a work of the United States Government, are not subject to copyright protection in the United States. Any CRS Report may be reproduced and distributed in its entirety without permission from CRS. However, as a CRS Report may include copyrighted images or material from a third party, you may need to obtain the permission of the copyright holder if you wish to copy or otherwise use copyrighted material.