



NATIONAL ORGANIZATION OF
SOCIAL SECURITY CLAIMANTS'
REPRESENTATIVES
ESTABLISHED 1979

February 26, 2024

Office of Legislation and Congressional Affairs,
Regulations and Reports Clearance,
Social Security Administration,
6401 Security Boulevard, 3rd Floor (East)
Baltimore, Maryland 21235-6401

Submitted via Regulations.gov

RE: Docket Number SSA-2023-0048, Social Security Scientific Integrity Policy

These comments are submitted on behalf of the National Organization of Social Security Claimants' Representatives (NOSSCR), a specialized bar association for attorneys and advocates who represent Social Security Disability Insurance (SSDI) and Supplemental Security Income (SSI) claimants throughout the adjudication process and in federal court.

We are encouraged by SSA's commitment to "promote a culture of scientific integrity." As the DRAFT SSA Scientific Integrity Policy states, "scientific findings and products must not be suppressed, delayed, or altered for political purposes and must not be subjected to inappropriate influence."

It is our understanding that over the past several years, SSA has conducted various studies regarding occupational information (for example, the "Vocational Rules Modernization: Updates to Modernize The Occupational Information Considered In Disability Determinations And Related Policy," RIN 0960-AI40, intended for publication in Spring 2021, but never released); yet despite any vocational research that might have been conducted, SSA has not released the data or conclusions, and instead continues to rely on outdated data from the Dictionary of Occupational Titles (DOT).

We are hopeful that with the implementation of the DRAFT Scientific Integrity Policy, SSA will take seriously the need for science-backed vocational data and will utilize that data in their decision-making processes. We agree that "open and timely communication of SSA's scientific information plays a valuable role in building public trust and understanding of the agency's work," and we encourage the agency to implement this policy so that continued improvements can be made and timely shared with the public.

Sincerely,

A handwritten signature in black ink, appearing to read "David Camp". The signature is stylized with a large, sweeping initial "D" and "C".

David Camp
Chief Executive Officer