

Here is a list of points given as part of the final explanation from the SOC Policy Committee, slightly edited for brevity, along with rebuttals. OMB accepted this explanation. Here's a link to the website with the explanation in full (scroll to Docket Number 2-0867 – Police, Fire, and Ambulance Dispatchers): [https://www.bls.gov/soc/2018/soc\\_responses\\_July\\_2016.htm](https://www.bls.gov/soc/2018/soc_responses_July_2016.htm).

As a reminder for how the SOC is supposed to be organized: according to OMB, "Classification Principle 2 dictates that *the nature of the work performed* is the main criterion for classifying a detailed occupation and determining where to place it in the structure."

Explanations with Rebuttals:

- The work performed includes speaking with callers, listening, and collecting and entering information.
  - o Rebuttal: This is a dramatic oversimplification of the work performed by 9-1-1 professionals. Technically, when someone calls 9-1-1 screaming that their loved one isn't breathing, the Public Safety Telecommunicator is listening to the caller and talking into the headset, but the skill required to coach someone through CPR while multitasking to dispatch paramedics clearly illustrates that *the nature of the work performed* cannot be compared to administrative/clerical dispatching.
- The job duties of workers in the Protective Service group often require some physical component or direct physical contact; i.e., apprehending, guarding, inspecting, patrolling, extinguishing, etc.
  - o Rebuttal: As far as we can tell, this "physical contact" factor has never been applied before, contradicts the official classification principles, and cannot be consistently applied. For example, emergency medical technicians – inarguably jobs that require physical contact – are listed in the category for healthcare practitioners. And some occupations that fit into the Protective Service group – Gambling Surveillance Officers and Parking Enforcement Workers – actually seem administrative/clerical.
- The primary tasks of taking calls and entering information into a system are more consistent with the work performed by other occupations in the Office and Administrative Support Occupations group than the work performed by occupations in the Protective Service Occupations group. Dispatching is a task that is found in another detailed occupation in the Office and Administrative Support group [referring to taxi dispatchers].
  - o Rebuttal: No one who understands the work performed by Public Safety Telecommunicators could think the job is similar to dispatching taxis. This oversimplified characterization of Public Safety Telecommunicators almost seems to be intended to justify a pre-drawn conclusion, which would fit with an overall pattern. As part of the SOC revision process, there were multiple comment periods. After the first round, there was an interim decision to maintain the status quo, justified by an explanation that clearly misapplied the SOC classification principles and a misunderstanding of the work performed by Public Safety Telecommunicators. For example, the justification said that the "work performed is that of a dispatcher, not a first responder." That's totally irrelevant. The Protective Service group is much broader than first responders (including "Meter Maids" and TSA baggage screeners) and does not include EMTs.
- Research on the hundreds of position descriptions from jurisdictions across the country showed that many Police, Fire, and Ambulance Dispatchers (60%) also have clerical duties such as filing paperwork, maintaining lost and found items, filling out paperwork and logs, and ordering office supplies. Despite the additional duties, dispatchers should be classified in the dispatcher occupations because of coding guideline 2.

- Rebuttal: Irrelevant factor as the criterion as noted above is about the “nature” of the work performed, and not a question of “quantity,” not to mention that any occupation including those in the Protective Service category comes with some clerical duties. Further, this is a misrepresentation of coding guideline 2. The coding guidelines are intended to assist users in consistently determining which SOC codes and titles apply to a particular job, not for determining how to organize the SOC.
- Moving the Police, Fire, and Ambulance Dispatchers would hinder agencies from conducting time series comparisons and conflicts with classification principle 10.
  - Rebuttal: Classification Principle 10 is new. It relates to maintaining consistency across different revisions of the SOC. In terms of process, it seems odd to apply what had been a proposed classification principle to the question of whether to reclassify PSTs. More importantly, as APCO pointed out to OMB, moving PSTs to the Protective Service group would better align the SOC with related federal classification systems.