

**COMMENTS OF APCO INTERNATIONAL
IN RESPONSE TO THE OFFICE OF MANAGEMENT AND BUDGET’S
NOTICE OF SOLICITATION OF COMMENTS
FOR THE PROPOSED REVISION OF THE
2010 STANDARD OCCUPATIONAL CLASSIFICATION**

I. INTRODUCTION

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Notice of solicitation of comments for the 2018 Standard Occupational Classification (SOC) revision.¹

Founded in 1935, APCO is a nonprofit organization and the world’s largest association of public safety communications professionals - meaning those state and local government employees who answer 9-1-1 calls and dispatch emergency responders. APCO’s membership exceeds 22,000 professionals. APCO has a long history of leadership in training, standards development, and national-level advocacy related to public safety communications.

APCO recognizes the importance of a well-organized SOC that accurately represents occupations. Based on our institutional experience and expertise, and review of the comments previously submitted in response to the Notice, we propose two revisions concerning the current detailed occupation “Police, Fire, and Ambulance Dispatchers” (43-5031). First, the detailed occupation “Police, Fire, and Ambulance Dispatchers” (43-5031) should be renamed “Public Safety Telecommunicators.” Second, this detailed occupation should be moved from the Office and Administrative Support Occupations (43-0000) major group to the Protective Service Occupations (33-0000) major group. In support of our recommended SOC revisions, we provide brief responses to the input requested in the Notice.

II. DETAILED OCCUPATION NAME CHANGE

APCO proposes renaming the “Police, Fire, and Ambulance Dispatchers” detailed occupation as “Public Safety Telecommunicators.” The 2010 SOC’s description for “Police, Fire, and Ambulance Dispatchers” is “Operate radio, telephone, or computer equipment at emergency response centers. Receive reports from the public of crimes, disturbances, fires, and medical or police emergencies. Relay information to law enforcement and emergency response personnel. May maintain contact with caller until responders arrive.” The SOC’s illustrative examples include police radio dispatcher, emergency operator, and 9-1-1 operator.

“Public Safety Telecommunicator” is the term preferred by professionals in this industry, in part because it encompasses call taking, dispatching, and other tasks associated with coordinating emergency response. “Dispatcher” is too narrow. In many ways, 9-1-1 call taking and emergency dispatch are distinct roles. They require different training and skillsets, and in our experience, public safety communications centers may have different policies with regard to hiring, training, and pay for call takers and dispatchers. That said, APCO supports continuing to classify these occupations together under a single detailed occupation in the SOC because there

¹ Office of Management and Budget, *Standard Occupational Classification Revision for 2018; Notice*, 79 Fed. Reg. 29620 (May 22, 2014).

is substantial mobility between call takers and dispatchers, and some agencies cross-train employees to perform both functions.²

“Public Safety Telecommunicator” also better encompasses the diversity and technical nature of these occupations and conveys the distinction from non-emergency dispatchers. The 9-1-1 system has evolved in recent years to take advantage of technology that makes receiving calls, providing emergency assistance over the phone, and dispatching the appropriate resources more efficient. Public Safety Telecommunicators must multitask and interface with disparate technologies. At a small agency, this might entail simultaneously questioning the caller, dispatching first responders, and using advanced technologies to retrieve caller location, medical information, and pertinent location history (such as whether there is a history of violence associated with an address). Finally, in recognizing the important contributions these professionals make to public safety, Congress established National Public Safety Telecommunicators Week.³

III. PLACEMENT IN MAJOR GROUP 33-0000 – PROTECTIVE SERVICE OCCUPATIONS

In addition to renaming “Police, Fire, and Ambulance Dispatchers” as “Public Safety Telecommunicators,” the detailed occupation should be moved from the Office and Administrative Support Occupations major group to the Protective Service Occupations major group. Public Safety Telecommunicators perform tasks that – unlike non-emergency dispatchers – share the same protective mission as law enforcement officers, firefighters, transportation security screeners, crossing guards, lifeguards, animal control workers, fish and game wardens, and other occupations in the SOC’s major group for Protective Service Occupations. The SOC should be revised to recognize the protective role of Public Safety Telecommunicators.

“Police, Fire, and Ambulance Dispatchers” are classified in the 2010 SOC as follows:

43-0000 Office and Administrative Support Occupations

43-5000 Material Recording, Scheduling, Dispatching, and Distributing Workers

43-5030 Dispatchers

43-5031 Police, Fire, and Ambulance Dispatchers

Classification within the Office and Administrative Support major group is inappropriate given the stress, training, and life-saving nature of the tasks performed by Public Safety Telecommunicators. Unlike non-emergency dispatchers, Public Safety Telecommunicators receive calls from people whose lives are in danger. Whether answering a phone call to 9-1-1 or a call for assistance from a first responder over the radio, the Public Safety Telecommunicator is responsible for actions that can mean the difference between life and death. Below, we provide more detailed information to explain why Public Safety Telecommunicators belong in the Protective Service Occupations major group. APCO proposes the following reorganization for the 2018 SOC:

² Further, and as mentioned below, at small agencies a single Public Safety Telecommunicator may perform both functions simultaneously.

³ See House Joint Resolution 284, 102nd Congress, Mar. 26, 1992.
<https://www.govtrack.us/congress/bills/102/hjres284/text>

- 33-0000 Protective Service Occupations (existing major group)
 - 33-9000 Other Protective Service Workers (existing minor group)
 - 33-9090 Miscellaneous Protective Service Workers (existing broad occupation)
 - 33-9094 Public Safety Telecommunicators (renamed detailed occupation)

IV. RESPONSES TO INPUT REQUESTED

1. Nature of the work performed

Public Safety Telecommunicators play a critical role in emergency response. The work they perform goes far beyond merely relaying information between the public and first responders. When responding to reports of missing, abducted, and sexually exploited children, the information obtained and actions taken by Public Safety Telecommunicators form the foundation for an effective response. When a hostage taker or suicidal person calls 9-1-1, the first contact is with the Public Safety Telecommunicator whose negotiation skills can prevent the situation from getting worse. During active shooter incidents, Public Safety Telecommunicators coach callers through first aid and give advice to prevent further harm, all while collecting vital information to provide situational awareness for responding officers. When police officers are being shot at, firefighters are calling a mayday, and EMTs are being ambushed, their calls for help go to Public Safety Telecommunicators.

This is life-saving work. It comes with an extreme emotional and physical impact that is compounded by long hours and the around-the-clock nature of the job. Indeed, research has suggested that Public Safety Telecommunicators are exposed to trauma that may lead to the development of posttraumatic stress disorder.⁴ Recognizing the risks associated with exposure to traumatic events, some agencies provide Critical Incident Stress Debriefing (CISD) teams to lessen the psychological impact and accelerate recovery for Public Safety Telecommunicators and first responders, alike. Stress management is an important topic in APCO's courses and training standards.

2. Attributes of the work performed that make the occupation distinct from other detailed occupations in the SOC

The high-stress, life or death nature of the work performed by Public Safety Telecommunicators makes this occupation distinct from others in the Office and Administrative Support Occupations. For non-emergency dispatchers, mistakes result in inefficiency. For Public Safety Telecommunicators, mistakes can cost lives. They are often communicating with people in great distress, harm, fear, or injury, while employing their experience and training to recognize a critical piece of information. In fact, there have been incidents, such as a Public Safety Telecommunicator recognizing the sound of a racked shotgun, that prevented serious harm or death of law enforcement officers who would have otherwise walked into a trap.

The information gathering, resource management, and other tasks performed by Public Safety Telecommunicators bear a greater similarity to questions asked by law enforcement officers, warnings given by firefighters, and screenings performed by transportation security screeners who are included in the Protective Service Occupations major group. Furthermore, as

⁴ Pierce, H., Lilly, MM. "Duty-related trauma exposure in 911 telecommunicators: considering the risk for posttraumatic stress." *J Trauma Stress*, 2012 Apr; 25(2):211-5.

telecommunications and public safety networks transition to IP-based technology, Next Generation 9-1-1 systems will enable the public to transmit texts, pictures, and real-time video to the PSAP. Public Safety Telecommunicators will also increasingly have more advanced technical tools and applications at their disposal. This will enhance Public Safety Telecommunicators' ability to provide emergency assistance and protect those involved with the response.

3. Job titles

In addition to "Public Safety Telecommunicator," professionals in this field go by a variety of titles, including Public Safety Communications Officer, Emergency Communications Technician, Telecommunication Specialist, and Telecommunicator.

4. Indications of the number of jobs or workers in the occupation

The Bureau of Labor Statistics estimates just under 100,000 professionals in this industry.⁵

5. Types of employers

Public Safety Telecommunicators are employed by state, county, tribal, and municipal entities, as well as private organizations.

6. Education and training

The training opportunities for Public Safety Telecommunicators are extensive. Organizations like APCO offer both on-site and online courses. Courses range from basic Public Safety Telecommunicator training to more advanced courses in topics such as emergency medical dispatch, active shooter incidents, disaster operations, crisis negotiation, and suicide intervention. APCO also offers a comprehensive 12-month program, resulting in certification as a "Registered Public-Safety Leader," that is designed to recognize excellence within our industry and prepare professionals for the challenges of leadership.

7. Licensing

Licensing requirements for Public Safety Telecommunicators vary significantly across states. Some states have no licensing requirement while others require substantial classroom and on-the-job training. Florida's 9-1-1 Public Safety Telecommunicator Program, for example, requires completion of a 232 hour training program and passage of a state examination, with 20 hours of continued education for recertification every two years.⁶

8. Tools and technologies

⁵ Occupational Employment and Wages, May 2013, 43-5031 Police, Fire, and Ambulance Dispatchers.

<http://www.bls.gov/oes/current/oes435031.htm>

⁶ 911 Public Safety Telecommunicator Program. <http://www.floridahealth.gov/licensing-and-regulation/911-public-safety-telecommunicator-program/index.html>

Public Safety Telecommunicators use an increasing number of technologies designed specifically for emergency response operations. One such technology is the computer-aided dispatch (CAD) system. CAD is an electronic system that assists Public Safety Telecommunicators with logging call information, tracking response unit availability, and accessing other resources. If the CAD is interfaced with the 9-1-1 system, it can retrieve caller number and location information. When attempting to locate callers who are using cellular phones, Public Safety Telecommunicators may need to query systems that triangulate phones or use GPS technology.

Public Safety Telecommunicators operate radio systems that have been designed specifically to meet public safety's needs, sometimes interfacing with disparate systems for cross-agency responses. Some Public Safety Telecommunicators manage these systems and are trained to understand how transmitters, receivers, repeaters, and control equipment function. Radio encryption for security and interoperability present challenges that Public Safety Telecommunicators must understand and overcome for an effective emergency response.

Public Safety Telecommunicators also operate specialized technology that ensures accessibility to emergency services. For example, a TTY (teletypewriter) is a device used by deaf, hearing impaired, and speech impaired people to communicate via telephone lines. There are technical limitations on this technology that impose unique communications protocols that Public Safety Telecommunicators must adhere to for an effective response. Additionally, text-to-911 is being implemented in some areas, requiring Public Safety Telecommunicators to use a specialized interface to connect with "callers" using this technology.

9. Professional or trade associations and unions

APCO is the largest association of public safety communications professionals, with over 22,000 members. Other relevant associations include the National Emergency Number Association (NENA), the International Academies of Emergency Dispatch (IAED), and the National Association of State 911 Administrators (NASNA).

V. CONCLUSION

APCO appreciates the opportunity to provide its views on revising the SOC to ensure that it accurately represents Public Safety Telecommunicators. APCO stands ready to provide any information necessary to assist the SOC Policy Committee with these efforts.