



Reclassification Update: OMB Requests Input for SOC Revision

Alison Venable

Government Relations Counsel

APCO International

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The Classification Problem

- OMB maintains a vast catalog of occupations called the Standard Occupational Classification (SOC).
- SOC is renewed every 8-10 years.
- Prior to the most recent revision (2014-2017) public safety telecommunicators were classified as “dispatchers” in the Office and Administrative Support category.
- APCO and others successfully convinced OMB to change the term to “public safety telecommunicators” but OMB declined to move the group to the Protective Service category.
- APCO worked with Congress on the 9-1-1 SAVES Act but has continued to hit roadblocks.
- Now, OMB has begun another formal revision process.
 - Comments due to the agency August 12th.

Background on the SOC

- One of several classification systems the federal government uses for statistical purposes.
 - Ex. To compare how many plumbers work in Virginia versus Maryland.
- The SOC has no direct impact on overtime requirements, salaries, retirement, or insurance rates.
- The SOC will not impact whether public safety telecommunicators are eligible for mental health and training grants.
- Correcting the SOC will make it a more useful statistical resource and properly recognize that public safety telecommunicators perform protective work.

SOC Structure

- 43-0000 Office and Administrative Support
 - 43-5000 Material Recording, Scheduling, Dispatching, and Distributing Workers
 - 43-5030 Dispatchers
 - 43-5031 Public Safety Telecommunicators
 - 43-5032 Dispatchers, Except Police, Fire and Ambulance
- 33-0000 Protective Service Occupations
 - 33-1000 Supervisors of Protective Service Workers
 - 33-2000 Firefighting and Prevention Workers
 - 33-3000 Law Enforcement Workers
 - 33-9000 Other Protective Service Workers

https://www.bls.gov/soc/2018/soc_2018_manual.pdf

SOC Structure cont'd

43-5031 Public Safety Telecommunicators

Operate telephone, radio, or other communication systems to receive and communicate requests for emergency assistance at 9-1-1 public safety answering points and emergency operations centers. Take information from the public and other sources regarding crimes, threats, disturbances, acts of terrorism, fires, medical emergencies, and other public safety matters. May coordinate and provide information to law enforcement and emergency response personnel. May access sensitive databases and other information sources as needed. May provide additional instructions to callers based on knowledge of and certification in law enforcement, fire, or emergency medical procedures.

Illustrative examples: 911 Operator, Emergency Operator, Public Safety Dispatcher, Public Safety Telecommunicator

SOC Classification Principles

- The nature of the work performed is the main criterion for classifying a detailed occupation and determining where to place it in the SOC structure.
- Over the years APCO has rebutted numerous arguments from OMB against changing the classification.
- OMB staff managing the SOC revision do not understand what 9-1-1 professionals do.

Rebutting OMB's Arguments

- OMB: The work performed is that of a dispatcher, not a first responder.
 - APCO: The Protective Service group is not a first responder group.
- OMB: Most dispatchers are precluded from administering actual care.
 - APCO: This is not true and likely relies on outdated information.
- OMB: Separating PSTs from other dispatchers would be confusing.
 - APCO: The SOC already separates electric utility dispatchers in a different group.
- OMB: Dispatchers are located in a separate area from field responders and have a different supervisory chain.
 - APCO: Irrelevant. The location of the work and the supervisory chain are not listed in the SOC classification principles.
- OMB: Dispatchers don't face physical risk.
 - APCO: The Protective Service category includes other jobs that don't face physical risk like the people watching camera feeds in casinos. Further, many ECCs deploy 9-1-1 professionals in the field.

Congress Steps In: The 9-1-1 SAVES Act

- In 2019, Congresswoman Norma Torres (D-CA), Congressman Brian Fitzpatrick (R-PA), Senator Richard Burr (R-NC), Senator Amy Klobuchar (D-MN) and others introduced the 9-1-1 SAVES Act in the House and Senate.
- Meant to force OMB to fix the classification.
- The legislation has consistently had bipartisan support and the reclassification language has been included in other legislative packages.
- 9-1-1 SAVES Act was reintroduced in 2021 and 2023.
- In 2023, Senators Amy Klobuchar (D-MN) and Marsha Blackburn (R-TN) introduced the Enhancing First Response Act as an alternative path in the Senate.

Status of Legislation

- Why hasn't the legislation passed?
 - Congress could be relying on the same faulty logic as OMB or entirely deferring to OMB.
 - New arguments have popped up: changing the SOC in between formal revisions would be disruptive and data continuity is important.
 - Misunderstanding about what the legislation would and would not do.
 - For example, confusing the impacts of state level reclassification with SOC reclassification.
- Modified 9-1-1 SAVES Act passed the House Education and Workforce Committee.
 - Changes the legislation from *directing* OMB to fix the classification to only *consider* fixing the classification.

The 2028 SOC

- In June, OMB announced the beginning of a multiyear process to revise the SOC.
- The process will likely include:
 - Initial round of public comments (due August 12th).
 - A policy committee will make initial determinations with explanations.
 - A second round of public comments.
 - The policy committee makes its final recommendations.
 - OMB makes a final decision.

APCO's Strategy

- Continue to push for the original 9-1-1 SAVES language that would *direct* OMB to fix the classification.
- Grow support for the Enhancing First Response Act in the Senate.
- Work directly with OMB to help them understand why reclassifying public safety telecommunicators is the right thing to do.
 - Starting with public comments to OMB.



[AGENCY LETTERHEAD]

Standard Occupational Classification (SOC) – Updates for 2028
BLS-2024-0001



My name is [BLANK]. I have worked in public safety for [BLANK] years and currently serve as the [TITLE] of the [AGENCY] in [JURISDICTION]. I am writing to express my views on the Office of Management and Budget’s revision of the Standard Occupational Classification (SOC). For the SOC to accurately reflect the modern workforce, Public Safety Telecommunicators should be classified as Protective Service Occupations.



The nature of the work performed by Public Safety Telecommunicators is protective.

[Pick 1-2 examples of lifesaving calls your agency has handled to describe. For example, coaching a caller through CPR, calming a suicidal caller, responding to an active shooter situation.]

The work performed by Public Safety Telecommunicators has become increasingly lifesaving and skilled, particularly since the previous revision of the SOC.

[Provide examples of how 9-1-1 has changed in the last 10 years. For example, is your agency using enhanced technology to save lives? Do you have more Public Safety Telecommunicators trained in EMD and tactical dispatch?]

In conclusion, Public Safety Telecommunicators should be classified as Protective Service Occupations.

Highlight the Nature of the Work Performed

- Topic sentence: The nature of the work performed by Public Safety Telecommunicators is protective.
- Discuss the most impactful, lifesaving aspect of your job.
 - Calming suicidal callers
 - Coaching callers through CPR
 - Gathering information or coordinating communications during an active shooter incident
- Pick 1-2 of these scenarios and provide examples.

Show how the Work has Changed

- Topic sentence: The work performed by Public Safety Telecommunicators has become increasingly lifesaving and skilled, particularly since the previous revision of the SOC.
- Discuss the changes in the last 10 years.
 - Increasing use of technology to save lives.
 - More critical incidents now than 10 years ago. For example, active shooter incidents, increasing natural disasters, civil unrest, etc.
 - Changes in agency training or certification requirements. For example, EMD and tactical dispatch training.

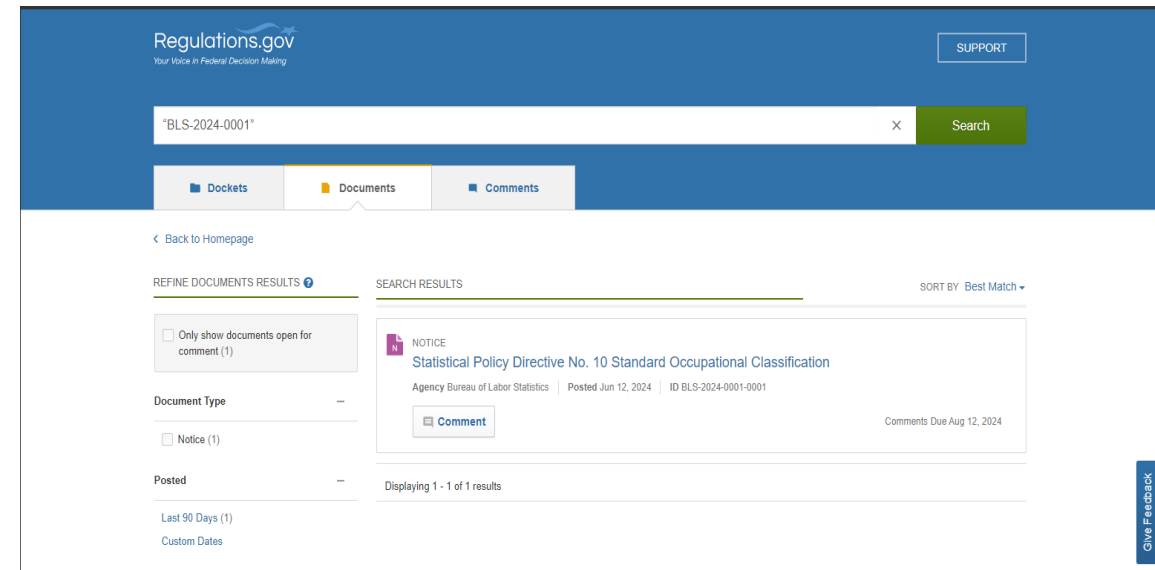
To recap

- Follow the APCO template to ensure your comments have all required information.
- Use your comments to highlight:
 - The protective nature of the work performed.
 - How the work has changed in recent years to become more and more protective and lifesaving.

The Public Comment Process

Comments must be submitted by August 12, 2024.

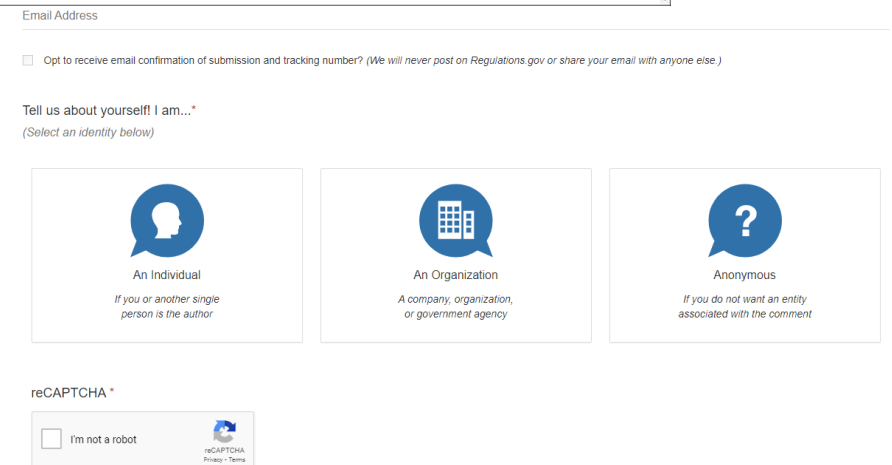
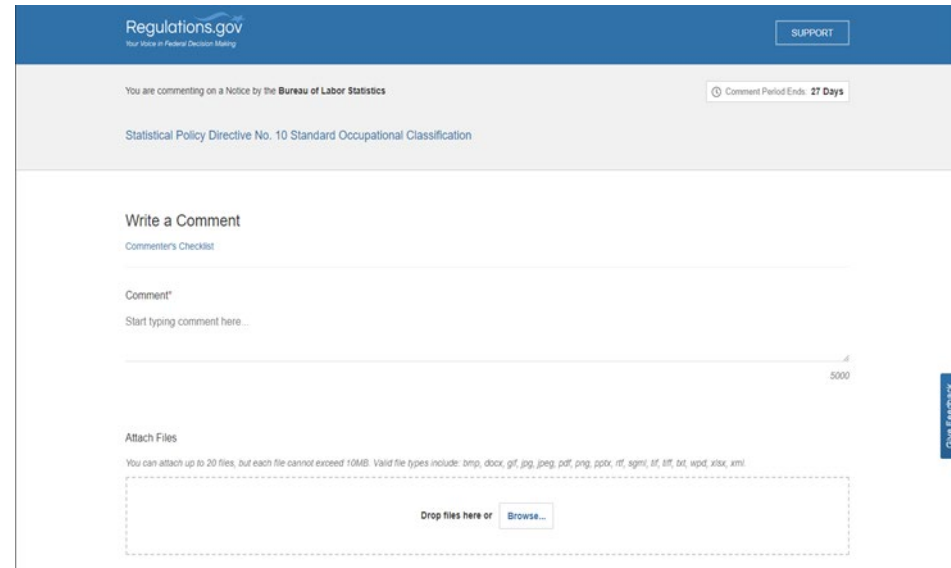
- Step 1: www.regulations.gov
- Step 2: Enter “BLS-2024-0001” (with quotes) in the Comment or Submission search box. Click Go.
- Step 3: Find “Statistical Policy Directive No. 10 Standard Occupational Classification” and click on the box that says “Comment.”



The screenshot displays the Regulations.gov website interface. At the top, the logo "Regulations.gov" is visible with the tagline "Your Voice in Federal Decision Making" and a "SUPPORT" button. A search bar contains the text "BLS-2024-0001" and a green "Search" button. Below the search bar, there are tabs for "Dockets", "Documents", and "Comments". The "Comments" tab is selected. On the left side, there are filters for "REFINE DOCUMENTS RESULTS" including "Only show documents open for comment (1)", "Document Type" (with "Notice (1)" selected), and "Posted" (with "Last 90 Days (1)" selected). The main content area shows "SEARCH RESULTS" for "Statistical Policy Directive No. 10 Standard Occupational Classification" by the "Agency Bureau of Labor Statistics", posted on "Jun 12, 2024" with ID "BLS-2024-0001-0001". A "Comment" button is present, and the text "Comments Due Aug 12, 2024" is displayed. At the bottom, it says "Displaying 1 - 1 of 1 results". A vertical "Give Feedback" button is on the right edge.

The Public Comment Process cont'd.

- Step 4: Type your comment into the text box or attach pre-written comments as a file.
- Step 5: Provide your email. Check the box for confirmation.
- Step 6: Self-identify and provide your name and additional information.



Additional Tips

- Provide examples and specifics but be very clear if offering data.
- It's okay to be brief.
- Read and re-read before submitting.
- Be passionate but not angry.
- Reach out to APCO with any questions.

What Will APCO's Comments Include?

- Describe the protective nature of the work and how it has become even more protective in recent years.
- Point to other federal data programs that treat public safety telecommunicators as a protective occupation.
- Provide data on how much more common it is for public safety telecommunicators to be trained in EMD and tactical dispatch.
- Provide data to estimate the number of lives saved by public safety telecommunicators.
- Show how changing the SOC would improve federal research.

Ensure Job Descriptions Convey the Protective Nature of the Work

- When applicable, descriptions should reference duties such as:
 - Gathering, analyzing, and reporting critical information during life-or-death situations such as crimes in progress, medical emergencies, and fire/rescue incidents;
 - Administering care by providing pre-arrival medical instruction or directing callers through procedures such as CPR, childbirth, or controlling of blood loss while emergency medical services are enroute;
 - Managing communications of emergency personnel responding to incidents and assisting with incident operations during events such as active shooter and officer down responses;
 - Taking protective actions for first responders by providing life-safety information during responses such as officer down and MAYDAY calls;
 - Analyzing conflicting and/or limited location information to direct first responders to the scene;
 - Negotiating with suicidal callers or hostage takers; and
 - Deploying to the scene of planned events, major emergencies, or ongoing incidents.
- <https://www.apcointl.org/~documents/docs/apco-member-message-on-aligning-job-descriptions-with-the-protective-nature-of-the-work>



Questions?

gro@apcointl.org

www.apcointl.org/advocacy/soc-revision/

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