

**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**

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I. EXECUTIVE SUMMARY

In the United States, children are taught to call 9-1-1 because the public trusts Public Safety Telecommunicators will be there to take appropriate action to protect them. Unfortunately, the federal government's classification system describing occupations in the United States fails to recognize these professionals for their dedication and the lifesaving nature of their work. The Association of Public-Safety Communications Officials-International, Inc. (APCO) seeks to correct this error and ensure Public Safety Telecommunicators receive the recognition they deserve.

As recommended in our initial comments and expanded upon herein, APCO urges the Office of Management and Budget (OMB) to revise the Standard Occupational Classification (SOC) such that 1) "Police, Fire, and Ambulance Dispatchers" are renamed "Public Safety Telecommunicators" and 2) this detailed occupation is moved from the Office and Administrative Support Occupations major group to the Protective Service Occupations major group.

APCO has been a leader in public safety communications for more than 80 years and is trusted and regularly relied upon by numerous federal agencies, Capitol Hill, and stakeholders across the industry. APCO's recommendations are informed by its 26,000 members, and an elected leadership and senior staff who individually have decades of experience and dedication to 9-1-1 operations and policy.

Unfortunately, APCO's recommendations were rejected in the interim decision regarding changes to the SOC. The SOC Policy Committee's (SOCPC) explanation for maintaining the status quo failed to even reference, much less account for, APCO's comments. The SOCPC remains exceedingly uninformed about the 9-1-1 profession, and out of touch with how Public Safety Telecommunicators work to protect and save lives every day.

APCO also has significant concerns with the process employed by OMB and the SOCPC. The rationale offered by the SOCPC and subsequent, ad hoc opinions expressed by OMB and SOCPC staff reveal an inexplicable pattern of unfair treatment of Public Safety Telecommunicators that has a discriminatory effect. OMB and the SOCPC are singling out Public Safety Telecommunicators by applying arbitrary criteria that are not consistent with the SOC classification principles and are not being applied to occupations currently in the Protective Service Occupations major group or others proposed by the SOCPC for inclusion.

Even worse, OMB and the SOCPC appear to be applying these arbitrary, ad hoc, and unfair criteria to achieve a predetermined end, based on an impermissible and speculative concern. Specifically, OMB has expressed concern that reclassification efforts are driven by motives unrelated to the SOC's nonstatistical purposes, such as improved worker benefits, which they believe would add costs to state and local governments. This concern contradicts OMB's clearly documented policy that use of the SOC for nonstatistical purposes plays no role in its development or revision. Consistent with the SOC's purpose, APCO's sole objective in seeking reclassification is to provide Public Safety Telecommunicators with the long overdue recognition and respect they deserve from the federal government. Accordingly, OMB's sole concern in revising the SOC must be to accurately serve the statistical purposes for which it is employed by federal agencies.

Public Safety Telecommunicators provide lifesaving advice, information gathering, and analysis that protects the public and first responders. The work they perform goes beyond merely receiving requests and dispatching resources. It's life or death, and the current

representation in the SOC does a disservice to them, as well as to the statistical purposes for which the SOC is designed. Other related classification programs at both the federal and international level properly consider Public Safety Telecommunicators to be Protective Service Occupations or, as the case may be, in a comparable category. Revision of the SOC is necessary to comport with reality and other classification programs.

II. INTRODUCTION

APCO hereby submits comments in response to the second Federal Register Notice of solicitation of comments, urging OMB to classify Public Safety Telecommunicators as Protective Service Occupations for the 2018 Standard Occupational Classification (SOC) revision.¹

Founded in 1935, APCO is a nonprofit organization with more than 26,000 members, making it the world's largest association of public safety communications professionals – meaning those professionals who work in or manage 9-1-1 centers (also known as public safety answering points (PSAPs)) or are responsible for public safety communications systems. APCO has a long history of leadership in training, standards development, and national-level advocacy related to public safety communications. APCO's elected leadership and senior staff individually have decades of experience and dedication to 9-1-1 operations and policy. With the collective insight of its membership, leadership, and staff, APCO is uniquely positioned to describe the work performed by Public Safety Telecommunicators in the United States.

Informed by its substantial institutional experience and expertise, APCO submitted comments to OMB in 2014 recommending two revisions that would make the SOC a more accurate tool for collecting, calculating, and disseminating data.² First, APCO recommended that the detailed occupation "Police, Fire, and Ambulance Dispatchers" (43-5031) be changed to "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. These recommendations were supported by other public comments in the record, as well as by a bipartisan, bicameral letter from leaders in 9-1-1 legislation and policy on Capitol Hill: the Co-Chairs of the Congressional NextGen 9-1-1 Caucus.³

Despite overwhelming consensus among those who understand these occupations, and absent contrary comments in the record, OMB's initial decision rejected these recommendations.⁴ Without explanation, the SOC Policy Committee (SOCPC) did not even address the recommendation to change the detailed occupation name to "Public Safety Telecommunicators" as the more appropriate term for these occupations.⁵ APCO continues to

¹ Office of Management and Budget, *Standard Occupational Classification Revision for 2018; Notice*, 81 Fed. Reg. 48307 (July 22, 2016).

² See Appendix I: APCO's Comments in Response to the Office of Management and Budget's Notice of Solicitation of Comments (issued in 2014) for the Proposed Revision of the 2010 Standard Occupational Classification.

³ See Appendix III: Support from Members of Congress.

⁴ See SOCPC Responses on Public Comments Regarding Changes for 2018, Docket Number 1-0199, United States Department of Labor, Bureau of Labor Statistics, (July 22, 2016) http://www.bls.gov/soc/2018/soc_responses.htm.

⁵ While the SOCPC's official explanation did not address this recommendation, APCO was able to obtain additional information from OMB staff which is addressed below. See Appendix II: Additional Information about the SOCPC's Explanation from OMB.

recommend that “Public Safety Telecommunicators” replace the term “Police, Fire, and Ambulance Dispatchers” in the SOC.

With regard to reclassification to the major group for Protective Service Occupations, the SOCPC offered only a very limited explanation based on sources unknown to APCO. The explanation reflects a misunderstanding and lack of awareness of the work performed by Public Safety Telecommunicators, as well as a disregard for the SOC classification principles.

In these comments, APCO provides additional information to explain why the SOC should be revised according to APCO’s recommendations, including information about why “Public Safety Telecommunicators” is the more appropriate title and the “protective” nature of the work performed by these professionals. While this is primarily about respect and appropriate recognition for these professionals, reclassification would have the added benefit of serving the actual purpose of the SOC by making it a more accurate resource for collecting, calculating, and disseminating data.

III. DISCUSSION

Below, APCO explains why the SOC must be revised such that a) “Police, Fire, and Ambulance Dispatchers” are renamed “Public Safety Telecommunicators” and b) this detailed occupation is moved from Office and Administrative Support Occupations to Protective Service Occupations. APCO also addresses c) the misguided explanation the SOCPC offered in rejecting these changes and d) the arbitrary and unfair application of criteria to Public Safety Telecommunicators that are not part of the SOC classification principles and are not applied to other occupations in the Protective Service Occupations major group.

a. “PUBLIC SAFETY TELECOMMUNICATORS” MUST REPLACE THE TERM “POLICE, FIRE, AND AMBULANCE DISPATCHERS”

The SOCPC relied on a rationale that is inconsistent with current practice in the SOC and prior consideration of detailed occupation name changes. “Public Safety Telecommunicators” more accurately represents these occupations.

- i. The SOCPC relied on a rationale that is inconsistent with current practice in the SOC and prior consideration of detailed occupation name changes.

While the SOCPC’s official explanation did not address the recommendation to use this more representative term for the detailed occupation name, OMB staff provided additional information in response to an inquiry from APCO. According to OMB, the SOCPC “did not recommend Public Safety Telecommunicators because, after surveying common job titles for dispatchers, it did not find that to be a dominant title being used. The titles Emergency Medical Dispatchers and 911 Dispatchers were far more common.”⁶ Regardless of whether the SOCPC performed a complete survey of these occupations nationwide to identify the most common job title, its rationale is inconsistent with the SOC’s use of detailed occupation names and past explanations from the SOCPC.

⁶ *Id.*

There is no indication that detailed occupation names are determined by the “dominant title being used.” In the SOC, detailed occupation names are descriptive of the included occupations.⁷ In the most recent SOC revision, the SOCPC’s explanations related to detailed occupation name changes included rationale such as “[it] better describes workers included in the occupation”⁸ and that a term is “outdated... and is not recognized by the national certifying body.”⁹ Changing the detailed occupation name to “Public Safety Telecommunicators” would be consistent with the SOC’s current practice, the SOCPC’s past rationale for name changes, and – importantly – consensus among national bodies with expertise of these occupations.

- ii. “Public Safety Telecommunicators” more accurately represents these occupations.

“Public Safety Telecommunicators” must replace the detailed occupation name, “Police, Fire, and Ambulance Dispatchers.” 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, and under OMB’s current proposal, public safety dispatcher would replace police radio dispatcher.¹⁰

The current detailed occupation name, “Police, Fire, and Ambulance Dispatchers,” misrepresents these occupations. “Dispatchers” is too narrow. By the SOC’s own description, this detailed occupation includes those who perform emergency call-taking, not just dispatch functions. While many in the community use “dispatchers” as informal shorthand, “Public Safety Telecommunicators” is more appropriate and widely recognized by professionals throughout this industry as the official term, in part because it encompasses call taking, dispatching, and other tasks associated with being responsible for mission critical communications during an emergency response. In many PSAPs, Public Safety Telecommunicators simultaneously perform call taking and dispatch functions. In other PSAPs, 9-1-1 call taking and emergency dispatch are distinct functions although it is common to be

⁷ Just within the Protective Service Occupations major group, consider detailed occupation name examples that are not common job titles, such as “First-Line Supervisors of Correctional Officers,” “Parking Enforcement Workers,” “Animal Control Workers,” and “Other Recreational Protective Service Workers.”

⁸ See *SOCPC Responses*, Docket Number 08-108.

⁹ See *id.*, Docket Number 29-2034.

¹⁰ APCO further recommends revising the occupation description for Public Safety Telecommunicators to “Operate systems receiving requests for emergency assistance from a variety of access technologies, computer-aided dispatch systems, record management systems, and public safety radio and other communications equipment at 9-1-1 public safety answering points and emergency operations centers. Respond to requests for emergency assistance and reports from the public and other sources of crimes, threats, disturbances, acts of terrorism, fires, medical emergencies, and other public safety matters. Provide assistance and advice, investigate, and take other actions necessary to preserve and protect safety of life and property. Access sensitive databases and other information sources as needed. Dispatch, coordinate, and provide safety instructions to emergency response personnel. May provide additional instructions based on knowledge of law enforcement, fire, or emergency medical procedures.” In addition, this occupation description should include a more representative list of illustrative examples: Police Communications Officer, Emergency Telecommunicator, Emergency Communications Technician, 9-1-1 Call Taker, Communications Officer, Communications Operator, Communications Specialist, and Emergency Communications Operator (ECO).

cross-trained and alternate between call taking and dispatch positions. Regardless of whether the functions are separate or combined, each position has a public safety mission. Public Safety Telecommunicators are protecting and saving the lives of the public and first responders.

“Public Safety Telecommunicators” also better encompasses the diversity and complex technical nature of the various tasks performed by these occupations as a whole. Public Safety Telecommunicators must interface with advanced technologies to, for example, obtain caller location, medical information, pertinent history (such as whether there is a history of violence associated with an address), and restricted information from criminal justice information systems, often multitasking while they do so to remain focused on their public safety mission. To better understand the diversity and technical nature of the skills required for these occupations, consider the following examples of training courses for Public Safety Telecommunicators:

- Active Shooter Incidents for Public Safety Communications
- Call Processing Incidents Involving Veterans with PTSD
- Communications Center Supervisor
- Communications Training Officer
- Crisis Negotiations for Telecommunicators
- Disaster Operations and the Communications Center
- Emergency Medical Dispatcher
- Fire Service Communications
- Law Enforcement Communications
- Telecommunicator CPR¹¹

Finally, “Public Safety Telecommunicators” is the term recognized and accepted by others at the national level. Back in 1992, Congress established National Public Safety Telecommunicators Week (NPSTW) to annually honor these professionals for the important contributions they make to “save the lives and property of our citizens.”¹² And the National Fire Protection Agency (NFPA) uses the term “Public Safety Telecommunicators” for its relevant standard.¹³

Thus, the detailed occupation name must be changed to “Public Safety Telecommunicators” to more accurately represent these occupations in the SOC. This name change is also fully consistent with the indisputable rationale for the need to reclassify these occupations in the Protective Service Occupations major group, as explained below.

¹¹ For more examples, see Training and Certification, All Courses, APCO International, <https://www.apcointl.org/training-and-certification/disciplines/all-courses.html>.

¹² See House Joint Resolution 284, 102nd Congress, (Mar. 26, 1992) <https://www.govtrack.us/congress/bills/102/hjres284/text>.

¹³ See NFPA 1061: Professional Qualifications for Public Safety Telecommunications Personnel, NFPA, (2014) <http://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards?mode=code&code=1061>.

b. THE WORK PERFORMED BY PUBLIC SAFETY TELECOMMUNICATORS IS A PROTECTIVE SERVICE

Public Safety Telecommunicators perform protective work and play a critical role in emergency response. APCO members, their professional colleagues, and supporters have shared thousands of comments as part of the SOC revision process, objectively recounting their heroic actions. Here are a few representative examples that were shared with APCO that leave no doubt about the protective nature of the work performed by Public Safety Telecommunicators:

- Work with field units during an active shooter incident to set up a perimeter, figure out who should evacuate and who should shelter in place, and coordinate a multi-agency response.
- Give CPR instructions to hysterical family members, friends, or even bystanders to save a life - “I’ve calmed that mother, brought her to a level where she is coherent enough to take direction, given her CPR instructions, having her count with me and then hearing that baby begin to cry. It made tears fall down my face. I saved that baby.”
- Collect information essential to the rescue of abducted persons.
- Calm and instruct a terrified caller to safely hide and prepare to protect themselves during a home invasion.
- Analyze background noise on an open line to determine whether an emergency exists that requires sending responders.
- Instruct callers on how to stay safe during tornados, hurricanes, earthquakes, etc.
- Talk callers through procedures to deliver a baby while responders are still en route.
- Act as an investigator to determine a caller’s location or reason for calling when they are unable to verbalize what is wrong. This could entail listening to background noises, detecting subtle cues, speaking in code, etc.
- Listen for background noises and research the history of the caller and their address before the responders arrive on scene to find anything that could compromise their safety - “In law enforcement things can change very quickly and a dispatcher’s alertness and gut instinct has saved my partner and me from potential injury on more than one occasion.”
- Give lifesaving instructions to save someone that is choking - “There is an incredible sense of satisfaction when you hear the unmistakable sound of food being expelled at a high rate, followed by coughing and sputtering and breath.”
- Counsel suicidal callers to accept the help of first responders.
- Talk citizens out of going back inside a burning house.
- Calm domestic violence victims while obtaining vital information needed for responders to safely aid the victims.
- Quickly investigate facts leveraging criminal databases to enable the arrest of fleeing suspects.
- Determine whether the caller is in immediate danger and should attempt an escape.
- Detecting cues in a responder’s voice to know when something is not right and to send help. “I’ve gotten back

up to an officer before he even knew he needed back up.”

- Perform personnel accountability report (PAR) checks when firefighters enter a structure fire.
- Assess incidents for potential violence to protect responding paramedics or firefighters.
- Escalating an alarm without hesitation when “MAYDAY” is heard on the radio - “One deputy introduced me to his mother saying, ‘This is the woman that has saved my life so many times.’”
- Determine the location of a wounded responder in the field.
- Manage communications with multiple responders and recognize

when backup is necessary - “[Public Safety Telecommunicators] are responsible for making sure [first responders] get to go home at the end of their shift.”

- “When I was in the field my dispatcher was my lifeline, the one person I knew always had my back. Now as a dispatcher, if an officer is requesting backup it is my responsibility to ensure backup comes.”
- Alert first responders of immediate danger - “The radio alert given by me on just that one occasion saved many lives, as the roof did collapse only a couple minutes later. Luckily, all personnel had left the building.”

Building upon these examples of the work performed, consider also the following excerpts of comments that provide greater insight into the protective nature of these occupations:

Protecting the Public

- “In my years of dispatching I have saved a newborn from SIDS and got him breathing while calming a panicked teen mother. I have kept suicidal parties from hurting themselves and reassured them they are valued I have talked armed suspects out of houses without incident or harm to anyone I have controlled severe bleeding given CPR many times talked elevated emotional callers down to a calm level in order to assist them. ... Ask the wife who called 9-1-1 last October 2015 what happened when she called 9-1-1 to say her husband fell and was turning blue. I answered that call and walked her through CPR while dispatching the responders for fire/medical/law... While not all CPR patients survive or even survive in tact her husband survived. He was attended to by Paramedics after I had been doing approx. 18 minutes of CPR due to the rural location. Helicopters could not fly due to weather it was snowing and a 45 mile drive to the nearest cardiac center. He walked out of that hospital 4 days later with no recollection of what happened BUT fully in tact mentally and physically with no side effects or neurological damage. The wife had never done CPR in her life but when I assured her she could do it and I would help her she went to task. She placed her husbands life in my hands that day.”
- “A hostage stand-off stands out as one of my most stressful and most memorable calls involving a barricaded subject that lasted for hours. While speaking with the suspect for forty-five minutes we developed a rapport. So much so, that when SWAT and a trained hostage negotiator arrived on the scene and attempted to take over the phone call the suspect refused to speak to him. I remained his first point

of contact for the duration of the incident and eventually talked him into letting his ex-girlfriend go and peacefully surrender.”

- “I answered a cellular 9-1-1 call from a juvenile who couldn't tell me the address where he was at, and only said ‘my mom is dying, my mom is dying.’ ... After several minutes I was finally able to ascertain that his mom had been shot, and I had to determine who had shot the mom as well as where was the gun now. Several more minutes later I finally get out of the juvenile the location of the gun and that his father had shot his mom and then shot himself. I kept the juvenile on the phone until I knew a Deputy was with him and he was safe. I had 2 objectives: 1. get the location of the gun, and who had it for my Officers safety. 2. and to figure out if anyone else was in danger in the residence.”

Protecting First Responders:

- “Personally I will never forget the alert dispatcher who early in my career attempted to raise me and my partner on the radio after we had responded to a large party that had gotten out of hand. Our first response was unintelligible due to the loudness of the party. After a second attempt to raise us on the radio we notified the dispatcher we were "Code 4" or okay. The dispatcher heard something she didn't like and her instinct told her to send another unit anyway. Thank goodness because within minutes of us telling her it was okay a fight broke out between some of the party goers with my partner and I caught in the middle of a fast spreading physical fight. Before we could even radio for more units they had arrived and we quickly regained control of the situation. In law enforcement things can change very quickly and a dispatcher's alertness and gut instinct has saved more than [one] officer as I am sure it saved my partner and I from potential injury that day.”
- “In regards to a specific call I have a clear call in my head that I will never [forget] where a woman called and was screaming that her husband was bleeding. She was hysterical and there were kids yelling in the background. Even though the woman did not give any details up front I probed her for answers only to discover that she had stabbed her husband in front of their three children. Because I obtained this information due to my intuition that I've gained as a dispatcher I was able to have the police respond in first and provide scene safety information to our unarmed firefighters and stop them from entering a dangerous situation where a woman was wielding a weapon. ... As a fire dispatcher we are constantly providing assistance to our fire personnel especially in the case of a large fire or if there is any danger on scene where we provide the mayday alert for any danger. One example of this includes a day where I was on the radio and during a third alarm structure fire and a roof was in danger of collapse. It was my job to take the information provided by only one firefighter over the radio and disperse that information to the more than fifty firefighters on scene who were in immediate danger. The radio alert given by me on just that one occasion saved many lives as the roof did collapse only a couple minutes later but luckily all personnel had left the building.”

These are not isolated or extreme examples. Public Safety Telecommunicators perform this type of work every day, and APCO elected to leave out more distressing stories and extreme

emergencies – mass shootings, terrorist attacks, natural disasters, etc. – which unfortunately are also a matter of routine work for these professionals. Public Safety Telecommunicators have provided instructions to dying friends, negotiated with suspects in active shooter incidents, and worse. And when the incident ends, Public Safety Telecommunicators cannot take a break; they must remain at their post to face the next emergency.

The SOCPC made a clear error of judgment in oversimplifying these occupations when it concluded “The work performed is that of a dispatcher.” The work performed by Public Safety Telecommunicators goes far beyond merely receiving requests and dispatching resources. They provide lifesaving assistance that protects the public and first responders. Many Public Safety Telecommunicators provide lifesaving medical instruction, for example, talking callers through CPR procedures that can save a life before first responders even arrive. But the ways they protect and save lives is not limited to providing medical instruction. When a caller is unable to speak plainly due to a present threat, Public Safety Telecommunicators detect subtle cues and communicate in code to identify the nature and location of an emergency to coordinate the response. When responding to reports of missing, abducted, and sexually exploited children, the information obtained and analysis performed by Public Safety Telecommunicators form the foundation for a rescue.

The work performed by Public Safety Telecommunicators is similar, and in some cases identical to the work performed by other occupations included in the Protective Service Occupations major group; they give instructions during emergencies, coordinate activities of police officers and firefighters, and gather, analyze, compile, and report information related to emergencies.¹⁴ And they must do so with the stress of knowing that their performance can make the difference between life and death.

This profession has changed dramatically since the SOC was established. This has been especially true in recent decades due to the development of emergency medical dispatch, changing and emerging threats,¹⁵ the introduction of new forms of communications used to reach 9-1-1 (from landline, to wireless, to vehicle telematics, to Voice over Internet Protocol, to automatic burglary/fire alarms, to texting, and beyond), new technologies such as caller location identification, and specialized scenarios such as active shooter response. Public Safety Telecommunicators perform an ever-increasing amount of complex tasks that the general public and first responders depend upon to protect and save their lives. Reclassification is clearly appropriate given the current scope of work performed by Public Safety Telecommunicators, and it would also position the SOC to remain relevant going forward, as telecommunications and public safety networks transition to more advanced, IP-based technology.

Public Safety Telecommunicators perform protective work without requiring innovative communications technologies that are commonplace in the consumer marketplace. However, two advanced systems, Next Generation 9-1-1 (NG9-1-1) and FirstNet’s nationwide public safety broadband network, are currently in development that promise to make Public Safety

¹⁴ See the descriptions of work performed by First-Line Supervisors of Police and Detectives (33-1012), First-Line Supervisors of Fire Fighting and Prevention Workers (33-1021), Private Detectives and Investigators (33-9021), etc., Standard Occupational Classification, United States Department of Labor, Bureau of Labor Statistics, (2010) http://www.bls.gov/soc/major_groups.htm.

¹⁵ In many respects, after the terrorist attacks of 9/11, PSAPs have become integrated into overall emergency management. See for example this article about how Arlington County, VA evolved after 9/11: Arlington Office of Emergency Management, *Ready Arlington: A New Chapter in Emergency Management*, ARL Now, (September 15, 2016) <https://www.arlnow.com/2016/09/15/ready-arlington-a-new-chapter-in-emergency-management/>.

Telecommunicators an even more critical element of an emergency response.¹⁶ NG9-1-1 systems will enable the public to transmit texts, pictures, and real-time video to PSAPs. FirstNet will enable Public Safety Telecommunicators to exchange this data with first responders in the field.¹⁷ Public Safety Telecommunicators will increasingly have to incorporate advanced tools into their jobs, which will enhance their ability to provide emergency assistance and protect those involved with the response.

The high-stress, life or death nature of the work performed by Public Safety Telecommunicators makes this occupation completely unlike occupations in the Office and Administrative Support Occupations. For non-emergency dispatchers, mistakes result in business inefficiencies – a taxicab or tow truck is delayed. Public Safety Telecommunicators are regularly communicating with people enduring great distress, harm, fear, or injury, while employing their experience and training to recognize a critical piece of information. They must remain constantly vigilant, knowing that the lives of the public and first responders are in their hands. The stress of this responsibility and intensity of repeatedly dealing with emergencies, call after call after call, come with an extreme emotional and physical strain 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 post-traumatic stress disorder.¹⁸ 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.

The protective nature of the work performed by Public Safety Telecommunicators is already well-known to the millions of people whose lives have been saved and protected because of a 9-1-1 call, and irrefutable for those who understand these occupations or take an objective view of the work performed.

c. THE SOCPC'S EXPLANATION INDICATES A MISUNDERSTANDING OF THE WORK PERFORMED BY PUBLIC SAFETY TELECOMMUNICATORS

The SOCPC's rationale for its initial decision not to reclassify Public Safety Telecommunicators as "Protective Service Occupations" indicates a fundamental misunderstanding of the work performed. OMB provided the following explanation:

The SOCPC did not accept these recommendations based on Classification Principle 2, which states that workers are coded according to the work performed. The work performed is that of a dispatcher, not a first responder. Most dispatchers are precluded from administering actual care, "talking" someone through procedures, or providing

¹⁶ Recognizing that major developments such as FirstNet and NG9-1-1 will lead to a paradigm shift for Public Safety Telecommunicators, APCO launched a major, association-wide initiative known as Project 43: Broadband Implications for the PSAP. One goal of Project 43 is to develop guidance to help Public Safety Telecommunicators and others in the public safety community to embrace technologies that will enhance the PSAP's role as a nerve center of emergency response and give these professionals more sophisticated tools to protect the public and first responders.

¹⁷ See FirstNet and Next Generation 911, FirstNet, <http://www.firstnet.gov/content/firstnet-and-next-generation-911>; see also The Future of End to End Public Safety Communications, FirstNet, (November 17, 2015) <http://www.firstnet.gov/newsroom/blog/firstnet-video-blog-firstnet-and-next-generation-9-1-1>.

¹⁸ Pierce, H., Lilly, MM., *Duty-related Trauma Exposure in 911 Telecommunicators: Considering the Risk for Posttraumatic Stress*, 25(2) J Trauma Stress, 211-15 (April 2012).

advice. Moving the occupation to the Protective Services major group is not appropriate and separating them from the other dispatchers would be confusing. Also, dispatchers are often located in a separate area from first responders and have a different supervisory chain.¹⁹

The SOCPC's conclusions are misguided. To the best of APCO's knowledge, the basis for these conclusions was not part of the public record, nor did it come from organizations like APCO with expertise in public safety communications. Below, APCO addresses the SOCPC's explanation and corrects factual inaccuracies.

- i. The SOCPC was wrong when it concluded that "Most dispatchers are precluded from administering actual care, 'talking' someone through procedures, or providing advice."

Neither OMB nor the SOCPC provided a basis for the claim that "Most dispatchers are precluded from administering actual care, 'talking' someone through procedures, or providing advice."²⁰ The fact is that Public Safety Telecommunicators are held to a high standard, and they are expected to provide advice and other assistance during emergencies.²¹ APCO's understanding is informed by more than 26,000 members and over 80 years as a leader in public safety communications, and it is consistent with the public record for the SOC revision, the abundance of training opportunities throughout this industry,²² and input from numerous agency managers and front-line Public Safety Telecommunicators describing their work and training requirements.

Claiming that Public Safety Telecommunicators are "precluded" suggests that there are laws or policies that prevent these professionals from giving any advice that protects or saves lives. APCO has been unable to find any such laws or policies. According to OMB staff, the SOCPC concluded that:

[W]ithout [emergency medical dispatch (EMD)] certification, dispatchers are not allowed to provide instruction to callers. This certification is often not required to be hired – numerous job postings support this. Some organizations or schools that offer the certification required years of job experience in order to qualify for certification.²³

¹⁹ See *SOCPC Responses*, Docket Number 1-0199.

²⁰ Note, however, that the additional information provided by OMB staff does address the responsibility of Public Safety Telecommunicators to provide medical advice, which APCO also refutes further below.

²¹ As illustrated by thousands of comments submitted to OMB, Public Safety Telecommunicators take this responsibility seriously. When a child goes missing, a home is being invaded, a loved one becomes unconscious – the worst moment of someone's life, the public trusts that the professional who answers their 9-1-1 call will use skills, training, and experience dealing with emergencies to provide assistance with a much higher standard of care than the person who answers their call for a taxicab or tow truck.

²² As noted below, over the last five years professionals from over 6,000 agencies, across all 50 states, have completed training through the APCO Institute, which is one of several training providers for Public Safety Telecommunicators.

²³ *Appendix II*.

Setting aside irrelevant factors such as whether certification is required to be hired and whether job experience is necessary to qualify for certification,²⁴ the SOCPC is wrong to limit its consideration of the work performed by Public Safety Telecommunicators to EMD.²⁵ Not every Public Safety Telecommunicator needs to be certified in EMD.²⁶ These professionals are responsible for a variety of emergencies, not just medical. If you were to call 9-1-1 in the District of Columbia, for example, your call would be answered by a professional whose *initial* training consisted of 14 weeks of classroom instruction and 12 weeks of on-the-job training with a Communications Training Officer, and Emergency Medical Dispatch is only one section of seven for their instructional program.²⁷

The SOCPC likely does not appreciate the diversity of agencies, governance bodies, and operational needs associated with Public Safety Telecommunicators. Not every state sets training or certification requirements, but that doesn't mean individual agencies lack their own requirements.²⁸ In fact, just over the last five years alone, professionals from over 6,000 agencies, across all 50 states, have completed training through the APCO Institute, which is one of several training providers for Public Safety Telecommunicators.²⁹

The SOCPC's conclusion also seems to contradict an assessment of these occupations made by OMB and others for a separate classification system. The North American Product Classification System (NAPCS) is a classification system for market or demand based

²⁴ Not only are these conclusions untrue, this appears to be another example of the SOCPC singling out Public Safety Telecommunicators. According to the SOC website, "The SOC is a task-based classification that does not differentiate occupations based on education or certification, but rather on the work performed." Standard Occupational Classification, United States Department of Labor, Bureau of Labor Statistics, <http://www.bls.gov/soc/>.

²⁵ Furthermore, the SOC clearly misunderstands what EMD entails. According to OMB, the SOCPC "found that some centers have cards with basic instructions (for CPR, for example) on them. If the dispatcher is certified and the jurisdiction allows it, they may read from the cards." *Appendix II*. In reality, EMD is specialized training in patient assessment-style caller questioning and provision of medical instructions via telephone. This training enables Public Safety Telecommunicators to provide a higher level of care during medical emergencies. EMD guide cards are comparable to "pocket protocols" carried by emergency medical technicians. While they might be consulted to varying degrees during emergencies, Public Safety Telecommunicators and EMTs alike must adapt to the unique needs of the emergency and think on the fly to effectively protect others.

²⁶ Public Safety Telecommunicators at some agencies are trained to provide medical instruction without receiving formal certification.

²⁷ Note that this level of training is comparable to what other agencies report across the country, and it is only the *initial* requirement for professionals who receive ongoing training throughout their careers. This may include meeting continuing education requirements, regular agency training, and topical issues to respond to evolving needs in public safety such as active shooter and counterterrorism incidents. Continuing with DC as an example, Public Safety Telecommunicators generally receive 40 hours of continuing education annually.

²⁸ It would also be difficult to draw conclusions from training-related data because, while APCO's Annual Report for 2016 cited a 17% increase in training across all Institute courses, Public Safety Telecommunicators adjust their training needs based on the evolving nature of public safety threats and operations. For example, APCO recently updated its course on Active Shooter Incidents for Public Safety Communications based on lessons learned from Sandy Hook, CT, Aurora, CO, and the Amish school shooting near Lancaster, PA. Following the Orlando nightclub shooting, many APCO members requested additional training opportunities, and APCO responded by creating a webinar series dedicated to this pressing need.

²⁹ Additionally, it is the nature of the work performed, not training, that matters for classification in the SOC. According to the SOC User Guide, "Additional levels of detail [below the detailed occupation level] may be used to distinguish workers who have different training or years of experience." 2010 SOC User Guide, United States Department of Labor, Bureau of Labor Statistics, at xviii, (February 2010) http://www.bls.gov/soc/soc_2010_user_guide.pdf.

products.³⁰ It was developed by agencies including OMB, the Department of Labor’s Bureau of Labor Statistics, and the U.S. Census Bureau “with extensive input from industry experts.”³¹ A NAPCS document intended to provide a definition for “Emergency help and dispatch services” – what APCO would call Public Safety Telecommunicator services – states that “Most call takers also provide emergency self-help or pre-arrival instructions to the caller.”³² While developed in a slightly different context, the NAPCS example contradicts SOCPC’s claim that most dispatchers are precluded from giving instructions or administering care.

- ii. The SOCPC was wrong when it concluded that “Moving the occupation to the Protective Services major group is not appropriate and separating them from the other dispatchers would be confusing.”

Based on the work performed by Public Safety Telecommunicators and breadth of occupations included in the Protective Services major group, reclassification is not only appropriate, it is *necessary* to prevent continued confusion arising from inappropriate classification in the Office and Administrative Support major group.

As described above, the lifesaving work performed by Public Safety Telecommunicators is fundamentally protective and similar to many occupations in the Protective Service Occupations major group. Contrary to the SOCPC’s claim that “separating them from other dispatchers would be confusing,” those who understand public safety communications find it confusing, and in fact thoroughly counterintuitive, that the work performed by Public Safety Telecommunicators could be viewed as remotely similar to the work performed by non-emergency dispatchers. Non-emergency dispatchers – taxicab, train, and tow truck dispatchers³³ – and others in the Office and Administrative Support Occupations major group do not provide lifesaving instructions during emergencies, are not required to report to work during major public safety incidents, are not the first professionals responsible for information gathering and analysis when a child goes missing, and are not the trusted lifeline for the public and first responders.

³⁰ See Overview of NAPCS Objectives, Guidance, and Implementation Strategy and Goals: A United States Perspective, Economic Classification Policy Committee of the United States, United States Economic Classification Policy Committee of the United States, (April 2003)

<http://www.census.gov/eos/www/napcs/papers/overviewobj.pdf>. The NAPCS is intended to complement the North American Industry Classification System (NAICS), a system used to collect and analyze U.S. economic data organized by industry. See North American Product Classification System (NAPCS), United States Census Bureau, <https://www.census.gov/eos/www/napcs/more.html>; see also Frequently Asked Questions (FAQs) About NAPCS, United States Census Bureau, <https://www.census.gov/eos/www/napcs/faqs.html>.

³¹ See *Frequently Asked Questions (FAQs) About NAPCS*.

³² See NAPCS Product List for NAICS 62191: Ambulance Services, United States Census Bureau, https://www.census.gov/eos/www/napcs/finalized/web_62191_final_reformatted_edited_US082208.pdf. The NAPCS, developed in three phases, consists of groupings of products, determined by extensive research of the working groups. The product tables consists of 9 columns (the industry subject area as determined by NAICS, the working group code, the product detail number, two columns identifying the national product detail, the U.S. title for the product, the U.S. definition of the product, and the NAICS industries producing the product). See Description of NAPCS Phase I-III Product Lists, United States Census Bureau, <https://www.census.gov/eos/www/napcs/napcsproductlists.html>; see also NAPCS Phase I-III, United States Census Bureau, <https://www.census.gov/eos/www/napcs/napcstable.html> (providing the NAPCS product lists).

³³ Office and Administrative Support, Standard Occupational Classification, United States Department of Labor, Bureau of Labor Statistics, (2010) <http://www.bls.gov/soc/2010/soc430000.htm>. See Dispatchers, Except Police, Fire, and Ambulance (43-5032).

In the interests of promoting a more relevant, accurate, and effective SOC, the SOCP would also benefit from drawing comparisons to companion or related programs, many of which directly contradict the SOCP's conclusions. A cursory review of SOC crosswalks and other data collection programs suggests that Public Safety Telecommunicators are generally classified in Protective Service or comparable categories, and are separated from non-emergency dispatchers in other classification systems.³⁴ Accordingly, reclassifying Public Safety Telecommunicators as Protective Service Occupations would make the SOC a more useful statistical resource for collecting, calculating, and disseminating data by rendering it consistent with data programs at the Department of Labor, Department of Education, and International Labour Organization.

1. Department of Labor

Reclassification would better align the SOC with multiple occupation-related data programs managed by the Department of Labor.

a. National Compensation Survey

Guidance issued by the Department of Labor's Bureau of Labor Statistics (BLS) for collecting compensation data categorizes "Police, Fire, and Ambulance Dispatchers" among Protective Service Occupations. BLS produces a diverse set of data from the National Compensation Survey (NCS), an establishment-based survey that collects a broad range of compensation data.³⁵ As part of the NCS process, economists select occupations from within surveyed establishments, classify the occupations using the SOC, and evaluate each job to determine a point value based on the work level. BLS publishes a guide to assist with these evaluations. According to the guide, "The duties and responsibilities of the job, along with consideration given to work performed and the skills, education, and training required for the job are evaluated. Points for each factor are then totaled to determine the overall work level for the job."³⁶

To assist with determining the work level for a job, the NCS guide includes factors for assigning points for the knowledge required, organized similarly to the SOC's major groups. As

³⁴ Additionally, reclassification would also be consistent with the Federal Communications Commission's (FCC) and Department of Transportation's recognition of the lifesaving work performed by Public Safety Telecommunicators. See Legal and Regulatory Framework for Next Generation 911 Services, Federal Communications Commission, (February 22, 2013) https://apps.fcc.gov/edocs_public/attachmatch/DOC-319165A1.pdf ("The effectiveness of 911 service is due largely to the efforts of thousands of public safety professionals, including the call-takers working in over 6,100 911 call centers (Public Safety Answering Points or PSAPs)."); "Preparing for Pandemic Influenza: Recommendations for Protocol Development for 9-1-1 Personnel and Public Safety Answering Points (PSAPs)," United States Department of Transportation, (May 3, 2007) https://www.ems.gov/pdf/preparedness/Resources/Pandemic_Influenza_Recommendations_For_911_And_PSAPS.pdf ("Public safety telecommunicators (also referred to as call-takers or emergency medical dispatchers) are called the 'first, first responder' because they are typically trained to give critical and often lifesaving instructions over the phone. They obtain important information for the EMS providers they dispatch to the scene, helping to appropriately allocate resources and provide scene safety").

³⁵ See Handbook of Methods: Chapter 8 National Compensation Measures, United States Department of Labor, Bureau of Labor Statistics, <http://www.bls.gov/opub/hom/pdf/homch8.pdf>.

³⁶ National Compensation Survey: Guide for Evaluating Your Firm's Jobs and Pay, United States Department of Labor, Bureau of Labor Statistics, 3, (May 2013) <http://www.bls.gov/ncs/ocs/sp/nbr0004.pdf>.

shown in Table 1, although the guide generally follows the SOC system to classify occupations, the section of the guide for Protective Service Occupations includes the SOC’s Police, Fire, and Ambulance Dispatchers. The only other occupation included in the NCS guide for Protective Service Occupations that is not part of the SOC major group is Emergency Medical Technicians and Paramedics.³⁷

Table 1. SOC Codes Covered in the NCS Guide Section for Protective Service Occupations

292041 Emergency Medical Technicians and Paramedics	333052 Transit and Railroad Police
331011 First-Line Supervisors of Correctional Officers	339011 Animal Control Workers
331012 First-Line Supervisors of Police and Detectives	339021 Private Detectives and Investigators
331021 First-Line Supervisors of Fire Fighting and Prevention Workers	339031 Gaming Surveillance Officers and Gaming Investigators
331099 First-Line Supervisors, Protective Service Workers, All Other	339032 Security Guards
332011 Firefighters	339093 Transportation Security Screeners
333011 Bailiffs	339091 Crossing Guards
333012 Correctional Officers and Jailers	339092 Lifeguards, Ski Patrol, and Other Recreational Protective Service Workers
333031 Fish and Game Wardens	339099 Protective Service Workers, All Other
333041 Parking Enforcement Workers	435031 Police, Fire, and Ambulance Dispatchers
333051 Police and Sheriff’s Patrol Officers	

b. The Directory of Occupations

The Department of Labor’s Directory of Occupations categorizes the equivalent of Public Safety Telecommunicator occupations in the Protective Service Occupations category, separate from non-emergency dispatchers, and includes an occupation description that contradicts the SOCP. Since April 1985, the Department of Labor’s Wage and Hour Division has published standard occupational titles and definitions in the Service Contract Act (SCA) Directory of Occupations.³⁸ The Directory of Occupations is used for wage determinations in government service contracts covered under the SCA.

In the Department of Labor’s Directory of Occupations, what APCO would call Public Safety Telecommunicators are included in the Protective Service Occupations category under the name “Alarm Monitors.”³⁹ The description of the occupation reads:

27000 PROTECTIVE SERVICE OCCUPATIONS
27004 ALARM MONITOR

³⁷ *Id.* at 44-45.

³⁸ SCA Wage Determinations, United States Department of Labor, Wage and Hour Division, 8-9, (2010) <https://www.dol.gov/whd/recovery/pwrb/tab6scawagedetermin.pdf>.

³⁹ SCA Directory of Occupations: Fifth Edition, United States Department of Labor, Wage and Hour Division, 93 (2006) <https://www.dol.gov/whd/regs/compliance/wage/scadirv5/scadirectvers5.pdf>.

The Alarm Monitor operates communication equipment to receive incoming calls for assistance and dispatches personnel and equipment to scene of emergency, operates telephone console to receive incoming calls for assistance, questions caller to determine nature of problem and type and number of personnel and equipment needed, following established guidelines, and scans status charts and computer screen to determine units available. This worker monitors alarm system signals that indicate location of fire or other emergency, operates two-way radio to dispatch police, fire, medical, and other personnel and equipment, and to relay instructions or information to remove units. This worker types commands on computer keyboard to update files and maintain logs, tests communications and alarm equipment, and backup systems to ensure serviceability. The Alarm Monitor may provide pre-arrival instructions to caller, utilizing knowledge of emergency medical techniques, and activate alarm system to notify fire stations.⁴⁰

Not only does the Department of Labor’s directory weigh in favor of reclassifying Public Safety Telecommunicators in the SOC as Protective Service Occupations, the occupation description – “may provide pre-arrival instructions to caller...” – contradicts the SOCPC’s conclusion that most dispatchers are precluded from providing advice or talking someone through procedures. It’s also worth noting that the directory’s Protective Service category is narrower than the SOC’s, excluding occupations such as lifeguards and crossing guards (which are listed in other categories), which would seemingly set a higher bar for inclusion as a Protective Service occupation. Furthermore, no one seems confused by the separation of Alarm Monitors from other types of dispatchers (Motor Vehicle and Service Order), both of which are categorized in the directory as Administrative Support and Clerical Occupations. Thus, the SOCPC made a clear error of judgment when it concluded that reclassifying Public Safety Telecommunicators as Protective Service Occupations in the SOC would be confusing.

2. Department of Education

Reclassification would also more closely align the representation of Public Safety Telecommunicators in the SOC with the Department of Education’s Classification of Instructional Programs (CIP).⁴¹ The CIP is a taxonomic coding scheme of instructional programs. Its purpose is to facilitate the organization, collection, and reporting of fields of study and program completions. It is used in a variety of education information surveys and databases.⁴²

In the CIP, the SOC major group for Protective Service Occupations most closely aligns with the category for Homeland Security, Law Enforcement, Firefighting, and Related Protective Services. As shown in Table 2, within this CIP category there is a listing for instructional programs categorized as “Homeland Security, Other,” which includes a list of programs that correspond to Public Safety Telecommunicator occupations. In other words, the Department of Education’s classification system for instructional programs categorizes programs related to

⁴⁰ *Id.*

⁴¹ Classification of Educational Programs, Department of Education, National Center for Education Statistics, (2010) <https://nces.ed.gov/ipeds/cipcode/browse.aspx?y=55>.

⁴² Introduction to the Classification of Educational Programs: 2010 Edition (CIP-2010), Department of Education, National Center for Education Statistics, 1, https://nces.ed.gov/ipeds/cipcode/Files/Introduction_CIP2010.pdf.

Public Safety Telecommunicator occupations alongside programs for other protective service occupations.

Table 2. Excerpt from the 2010 Classification of Instructional Programs⁴³

General Grouping	43) HOMELAND SECURITY, LAW ENFORCEMENT, FIREFIGHTING AND RELATED PROTECTIVE SERVICES.
Intermediate Grouping	43.03) Homeland Security.
Specific Instructional Programs	43.0399) Homeland Security, Other.
Definition	Any instructional program in homeland security not listed above.
Illustrative Examples	[Search and Rescue Technician] [Emergency Telecommunicator] [Emergency Services Communications] [Public Safety Communications]

3. International Labour Organization

The SOCPC has previously recognized that the SOC’s “Police, Fire, and Ambulance Dispatchers” should be considered protective service workers when mapping to occupations in the SOC’s international equivalent. The International Labour Organization, an agency of the United Nations, maintains the International Standard Classification of Occupations (ISCO), which is the international equivalent of the SOC.⁴⁴

The ISCO does not include occupations that directly align with Public Safety Telecommunicators. However, in the SOC-ISCO crosswalk, which is a reference table that matches detailed occupations from the SOC to corresponding listings in the ISCO, “Police, Fire, and Ambulance Dispatchers” are matched to the ISCO listing for “Protective Services Workers Not Elsewhere Classified.” This ISCO group includes many other occupations from the SOC’s Protective Service Occupations major group. In contrast, the SOC’s non-emergency dispatchers are matched to the ISCO’s Transport Clerks, which is listed in the group for Numerical and Material Recording Clerks.

This crosswalk, which matches the SOC’s Public Safety Telecommunicators occupations with the ISCO’s Protective Services group, was developed by the Bureau of Labor Statistics and

⁴³ Note that the descriptive labels in the left-hand column were derived from an explanation of the CIP taxonomy. The CIP does not use terms of art for each organizational level like the SOC uses “Major Group,” “Minor Group,” etc. See *Introduction*, at 2, (stating “The CIP taxonomy is organized on three levels: 1) the two-digit series, 2) the four-digit series, and 3) the six-digit series. The two-digit series represent the most general groupings of related programs. The four-digit series represent intermediate groupings of programs that have comparable content and objectives. The six-digit series, also referred to as six digit CIP Codes, represent specific instructional programs.”).

⁴⁴ The ISCO is an international occupation classification similar to the SOC. It is used as a basis for international reporting, comparison, and exchange of statistical and administrative data about occupations and a model for development of national and regional classifications. It is developed and maintained by the International Labour Organization, at their International Conference of Labour Statisticians, which is an agency within the United Nations. See *International Standard Classification of Occupations*, International Labour Organization, <http://www.ilo.org/public/english/bureau/stat/isco/index.htm>.

approved by the SOCPC.⁴⁵ Thus, reclassification would make the SOC more consistent with other classification systems, as well as the SOCPC’s previous concurrence that Public Safety Telecommunicators align with protective service workers for the SOC-ISCO crosswalk.

Table 3. Excerpt from the SOC-ISCO Crosswalk

2010 SOC Code	2010 SOC Title	ISCO-08 Code	ISCO-08 Title EN
43-5031	Police, Fire, and Ambulance Dispatchers	5419	Protective services workers not elsewhere classified

d. THE SOCPC’S EXPLANATION INDICATES AN ARBITRARY AND UNFAIR APPLICATION OF FACTORS THAT ARE IRRELEVANT TO THE SOC’S CLASSIFICATION PRINCIPLES

The SOCPC’s explanation unfairly implies that reclassification should be determined based on a direct comparison between Public Safety Telecommunicators and first responders: “The work performed is that of a dispatcher, not a first responder... Also, dispatchers are often located in a separate area from first responders and have a different supervisory chain.” Such a comparison is inconsistent with the SOC classification principles and current makeup of the Protective Service Occupations major group.

Classification in the Protective Service Occupations major group cannot and should not be based on comparing Public Safety Telecommunicators to first responders. The issue is whether the work performed by Public Safety Telecommunicators is protective in nature, which it clearly is. By forcing a comparison to first responders, the SOCPC is introducing unwarranted, arbitrary, and unfair classification criteria, and it is only doing so for Public Safety Telecommunicators.

Setting aside that these factors are not part of the established SOC classification principles, applying them would be unworkable. The SOC does not classify all first responders in the Protective Service major group.⁴⁶ Moreover, the Protective Service major group proposed for 2018 is largely composed of occupations that are not first responders, such as: parking enforcement officers, meter maids, animal control officers, dog catchers, gambling surveillance officers, gambling monitors, casino investigators, private investigators (including store detectives), security guards (including bouncers), construction site crossing guards, flaggers, lifeguards, ski patrol, transportation security screeners, playground monitors, warrant servers, and school bus monitors.⁴⁷ The inclusion of school bus monitors is especially revealing of the SOCPC’s unfair and capricious treatment of Public Safety Telecommunicators because it was apparently proposed for inclusion by the SOCPC without any public input, data showing the

⁴⁵ The crosswalk was approved by the SOCPC at its July 2012 quarterly meeting. Crosswalk between the International Standard Classification of Occupations (ISCO-08) and the 2010 Standard Occupational Classification (SOC), United States Department of Labor, Bureau of Labor Statistics, 1, (July 2012) http://www.bls.gov/soc/ISCO_SOC_Crosswalk_process.pdf.

⁴⁶ See Emergency and Medical Technicians and Paramedics (29-2041), Standard Occupational Classification, United States Department of Labor, Bureau of Labor Statistics, (2010) <http://www.bls.gov/soc/2010/soc292041.htm>.

⁴⁷ Preliminary 2018 SOC Detailed Definitions, United States Department of Labor, Bureau of Labor Statistics, 76, (July 2016) http://www.bls.gov/soc/2018/soc_2018_definitions_changes_tracked.pdf.

training required, and certainly without any comparison to first responders.⁴⁸ Thus, the SOCCPC's ad hoc, discriminatory, baseless, and unfair rationale that would equate Public Safety Telecommunicators with first responders would be totally unworkable for classification in the Protective Service major group, and would disqualify many existing and proposed occupations.

The SOCCPC's claim that Public Safety Telecommunicators are located in a separate area and have a different supervisory chain to that of first responders is yet another illustration of unwarranted, arbitrary, and unfair factors having a discriminatory effect on Public Safety Telecommunicators, and it is not relevant to the question of work performed. If the location and supervisory chain of occupations were relevant factors, the SOC would again require substantial changes to the current and proposed list of occupations in the Protective Service major group. For example, gambling surveillance officers are located in a separate area when they "use one-way mirrors above the casino floor" and use audio/video equipment to observe operations from a desk – both in the sense that they're not in the immediate area of the activity and that they are in a separate area from casino security guards, let alone first responders.⁴⁹ Lifeguards, parking enforcement workers, and school bus monitors, just to name a few, do not share a supervisory chain with first responders. It's also worth emphasizing that even if Public Safety Telecommunicators are in a separate area, they still perform protective, lifesaving work and suffer emotional and physical harm as a result.

Being in a separate area or having a different supervisory chain from first responders is not only irrelevant, the SOCCPC is misinformed about Public Safety Telecommunicators. For example, it is common for Public Safety Telecommunicators to be under the command of a law enforcement or fire/rescue official, and in some cases the Telecommunicators themselves are sworn personnel. In fact, police, fire, and EMS personnel in many agencies serve shifts in PSAPs as Public Safety Telecommunicators. Furthermore, some Public Safety Telecommunicators do in fact respond to the scenes of certain fire, law enforcement, and emergency medical operations.⁵⁰

To refocus on the appropriate criteria for reclassification, the SOCCPC should only be considering the nature of the work performed by Public Safety Telecommunicators and whether their lifesaving work is a protective service. According to OMB staff, part of the SOCCPC's basis for rejecting reclassification was that they "did not find the providing of medical instruction to be a dominant job task. The emphasis is on gathering the important information quickly and relaying it to the appropriate section for dispatch." Again, this indicates that the SOCCPC is misinformed and is applying unfair criteria to Public Safety Telecommunicators.

⁴⁸ See *id.* at 76, Occupation Number 33-9094, where School Bus Monitors are included as a proposed addition for the 2018 SOC, but no information about these occupations or their inclusion in the Protective Service Occupations major group is given in the list of SOCCPC Responses on Public Comments Regarding Changes for 2018.

⁴⁹ *Id.* at 75, Occupation number 33-9031.

⁵⁰ Many APCO members have shared comments that directly refute the notion that Public Safety Telecommunicators never respond to the scene of an emergency. For example, the Northeast Municipal Law Enforcement Council (NEMLEC) is a consortium of public safety agencies that share resources and personnel. Public Safety Telecommunicators are shared through NEMLEC for incidents that may entail response to the scene for SWAT call-outs, mass casualty incidents, and a variety of other emergencies. See also, Rhonda Harper, Understanding What a Tactical Dispatcher Is, Public Safety Communications, 36-42, (January 2015) <https://www.apcointl.org/doc/training-certification-1/577-cde-38939-tactical-dispatch/file.html>; see also NFPA 1061 Standard for Professional Qualifications for Public Safety Telecommunicator, Section 3.3.9.3 (2007) (defining "Public Safety Telecommunicator III," for a specialized Public Safety Telecommunicator as someone who "responds to the scene of an emergency.").

As discussed above, the SOCPC's focus on medical instruction indicates a misunderstanding of these occupations because the nature of the protective work performed by Public Safety Telecommunicators goes far beyond medical emergencies. Further, it is unclear what classification principle the SOCPC had in mind with regard to its assessment of the "emphasis" or "dominant job task." Surely they cannot intend to require Public Safety Telecommunicators to spend the majority of their time giving CPR instructions, counseling suicidal persons, or negotiating during hostage situations to warrant reclassification. The time, place, and frequency of emergencies is unpredictable, a truth that adds to the stressful nature of these occupations. Lifeguards, playground monitors, bailiffs, firefighters, and so many others in the Protective Service Occupations major group may spend the majority of their time not having to take protective action. But just as with Public Safety Telecommunicators, they must remain constantly vigilant and take action when a need arises to protect lives and property. This readiness and the responsibility to take protective action – inherent to the work performed by Public Safety Telecommunicators – are what separate Protective Service Occupations from others in the SOC.

Simply put, the official guidance for SOC revision clearly states that "the nature of the work performed, including specific activities and tasks... is the most important type of information" for the SOCPC.⁵¹ From the examples provided above, substantial public comments, and the agreement of national leaders in public safety communications, it should be obvious that the nature of the work performed by Public Safety Telecommunicators is protective.

IV. PUBLIC SAFETY TELECOMMUNICATORS DESERVE TO BE RECOGNIZED AS PROTECTIVE SERVICE OCCUPATIONS

Reclassifying Public Safety Telecommunicators as Protective Service Occupations in the SOC is about recognizing these professionals for the lifesaving work they perform. APCO is unaware of any direct relationship between the SOC and any laws, regulations, or policies related to salaries or benefits.

OMB staff expressed concern that reclassification could relate to a change in salaries or benefits, thereby imposing additional costs on those who employ Public Safety Telecommunicators.⁵² Throughout the revision process, APCO has repeatedly made clear in its advocacy and member communications that the benefit of reclassification is recognition and respect. The SOC's principles are clear: occupations are classified according to the work performed.⁵³ Moreover, OMB itself has been clear that "although the classification may also be used for various nonstatistical purposes (e.g., for administrative, regulatory, or taxation functions), the requirements of government agencies or private users that choose to use the SOC for nonstatistical purposes play no role in its development or revision."⁵⁴

With the benefit now of an extensive record illustrating the protective nature of work performed by Public Safety Telecommunicators, APCO sincerely hopes that the SOCPC will better appreciate and understand that these professionals desire and deserve this recognition and respect from their federal government. APCO therefore urges OMB to fairly apply the SOC

⁵¹ Revising the Standard Occupational Classification, United States Department of Labor, Bureau of Labor Statistics, 12, http://www.bls.gov/soc/revising_the_standard_occupational_classification_2018.pdf.

⁵² Meeting with Paul Bugg, Economist, Statistic and Science Policy Branch, Office of Management and Budget, (July 28, 2016).

⁵³ *See Notice*.

⁵⁴ *Id.*

classification principles and appropriately recognize the protective nature of the work performed by Public Safety Telecommunicators.

V. CONCLUSION

Reclassifying Public Safety Telecommunicators as Protective Service Occupations would correct an inappropriate representation in the SOC, recognize these professionals for the lifesaving work they perform, and better align the SOC with related classification systems. APCO appreciates the opportunity to share its insight in this proceeding.

Respectfully Submitted,

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APPENDIX I

APCO's Comments in Response to the Office of Management and Budget's Notice of Solicitation of Comments (issued in 2014) for the Proposed Revision of the 2010 Standard Occupational Classification

**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.⁵⁵

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

⁵⁵ 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.⁵⁶

“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.⁵⁷

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:

⁵⁶ Further, and as mentioned below, at small agencies a single Public Safety Telecommunicator may perform both functions simultaneously.

⁵⁷ 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.⁵⁸ 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

⁵⁸ 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.⁵⁹

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.⁶⁰

8. Tools and technologies

⁵⁹ Occupational Employment and Wages, May 2013, 43-5031 Police, Fire, and Ambulance Dispatchers.

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

⁶⁰ 911 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.

Respectfully Submitted,

Jeffrey S. Cohen
Chief Counsel
APCO International
cohenj@apcointl.org

APPENDIX II

Additional Information about the SOCPC's Explanation from OMB

From: Bugg, Paul EOP/OMB
Sent: Tuesday, September 13, 2016 5:19 PM
To: Mark Reddish
Subject: RE: Question about the 2018 SOC Revision

Mark,

Thanks for your inquiry. I have asked the workgroup to address your questions and it has provided the following information.

Why didn't OMB address the suggestion to change the detailed occupation name from "Police, Fire, and Ambulance Dispatchers" to "Public Safety Telecommunicators"?

The Standard Occupational Classification Policy Committee's (SOCPC) Workgroup did not recommend Public Safety Telecommunicators because, after surveying common job titles for dispatchers, it did not find that to be a dominant title being used. The titles *Emergency Medical Dispatchers* and *911 Dispatchers* were far more common.

How did the SOCPC get the impression that most dispatchers are precluded from providing advice or talking someone through procedures?

The workgroup identified the existence of emergency medical dispatch certification. It is the workgroup's understanding that without this certification, dispatchers are not allowed to provide instruction to callers. This certification is often not required to be hired – numerous job postings support this. Some organizations or schools that offer the certification required years of job experience in order to qualify for certification.

In the lists of tasks for 911 dispatchers, most do not include "provide life-saving procedure instruction" as a task. There are numerous job tasks listed such as answering calls, dispatching assistance, entering information into system, relaying information, gathering detailed information, and prioritizing calls. Some do list general tasks such as providing advice or offering instruction, without specific reference to life-saving procedures. Digging a little deeper, the workgroup found that some centers have cards with basic instructions (for CPR, for example) on them. If the dispatcher is certified and the jurisdiction allows it, they may read from the cards.

In short, the workgroup found that the majority of dispatchers hired do not have the certification. Most postings state that only a GED is required. Some jurisdictions do require the employees to later get certification. The workgroup did not find the providing of medical instruction to be a dominant job task. The emphasis is on gathering the important information quickly and relaying it to the appropriate section for dispatch.

I hope you find this information useful. Please let me know if you have additional questions.

Paul

APPENDIX III

Letters of Support from Congress

Congress of the United States
Washington, DC 20510

June 23, 2016

Howard A. Shelanski
Administrator
Office of Information and Regulatory Affairs
725 17th St. NW
Washington, DC 20503

Dear Administrator Shelanski:

As Co-Chairs of the Congressional Next Generation 9-1-1 Caucus, we write to urge you to update the classification of 9-1-1 call takers and dispatchers as part of the revisions to the Standard Occupational Classification (SOC).

The SOC is a valuable tool for federal statistical agencies that helps classify workers into useful occupational categories and provides an accurate picture of the American workforce. The business community and government agencies depend on this information to be up to date and reliable. The ongoing revision process to SOC announced in May 2014 provides an opportunity to more accurately reflect the role of 9-1-1 call takers and dispatchers.

In the current version of the SOC, 9-1-1 call takers and dispatchers are labeled “Police, Fire, and Ambulance Dispatchers.” We support updating the detailed occupation name to “Public Safety Telecommunicators,” which better captures the complex and technical nature of these occupations and acknowledges the distinction from non-emergency dispatchers. Public Safety Telecommunicators are not just dispatchers. In some cases their job can entail simultaneously questioning the caller, dispatching first responders, and using advanced technologies to retrieve caller location, medical information, and pertinent location history.

The SOC should also be revised to recognize the public safety role played by Public Safety Telecommunicators through categorization with other “Protective Service Occupations.” Public Safety Telecommunicators perform tasks that share the same protective mission as law enforcement officers, firefighters, transportation security screeners, crossing guards, lifeguards, wardens and other occupations in the Protective Service Occupations major group. The current classification within the “Office and Administrative Support” major group is not consistent with the specialized training and life-saving nature of the tasks performed by Public Safety Telecommunicators.

Public Safety Telecommunicators receive calls from people in need of urgent help and their actions can mean the difference between life and death. We urge you to make to make these changes to accurately reflect the nature of their profession in the SOC. We also urge you to act quickly to publish the recommendations of the SOC Policy Committee in the Federal Register to provide sufficient time for public feedback before the anticipated publication of the final version of the revised SOC in the summer of 2017.

Sincerely,


Amy Klobuchar
United States Senator


Richard Burr
United States Senator


Anna G. Eshoo
Member of Congress


John Shimkus
Member of Congress

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Congress of the United States
House of Representatives
Washington, DC 20515

September 8, 2016

COMMITTEES:
HOMELAND SECURITY
SUBCOMMITTEES:
BORDER AND MARITIME SECURITY
OVERSIGHT AND MANAGEMENT EFFICIENCY

NATURAL RESOURCES
SUBCOMMITTEES:
INDIAN, INSULAR AND ALASKA NATIVE AFFAIRS
WATER, POWER AND OCEANS

The Honorable Shaun Donovan
Director
Office of Management and Budget
725 17th Street, NW
Washington, D.C. 20503

The Honorable Howard A. Shelanski
Administrator
Office of Information and Regulatory Affairs
725 17th Street, NW
Washington, D.C. 20503

Dear Director Donovan and Administrator Shelanski:

I write to express my disappointment in the recent recommendation by the Office of Management and Budget (OMB) to classify public safety telecommunicator as an "Office and Administrative Support Occupation" in the draft Standard Occupational Classification (SOC). As a former 9-1-1 dispatcher, I know that public safety telecommunicators are professionals who are critical partners to our first responders, and I urge the Office of Management and Budget (OMB) to classify these public safety workers as a "Protective Service Occupation" in the final SOC structure.

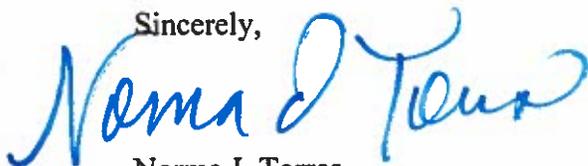
Public safety telecommunicators are required to receive specialized training and must either obtain national certification, state certification, or a combination of the two. National dispatcher certification associations often require advanced coursework to complete certification. For example, the Association of Public Safety Communications Officials (APCO) offers an emergency medical dispatcher (EMD) certification which requires courses in anatomy and physiology, legal and liability issues, and stress management. These are rigorous subjects that virtually no administrative support personnel in any field is required to learn or understand. Additionally, dispatchers often have to take additional exams offered by their potential employers, including a written exam to ensure knowledge of local law enforcement rules and procedures. Dispatchers also are tested regularly by their departments for knowledge of local, state, and federal laws. Initial and ongoing training is a vital part of a 9-1-1 dispatcher's career, and these training requirements clearly demonstrate that dispatchers must possess a level of knowledge and education that far exceeds what is generally required of administrative personnel. OMB must take this training into account if it hopes to develop an accurate occupational classification structure.

I know firsthand that public safety telecommunicators are not just support staff, but are integral members of first responder teams who do far more than answer a phone and send help. During critical incidents such as large fires, civil unrest, or weather related incidents, telecommunicators are mobilized just like police and fire personnel. My fellow dispatchers also work in life-or-death situations, often talking to callers in their greatest hour of need. As a former dispatcher I know firsthand that on any given day, they may take a call from an individual on the brink of committing suicide or must gather key information if a crime is in progress to be later be used in court. In fact, conversations between dispatchers and suspects are often Miranda exempt, and testimony from dispatchers can serve as critical evidence in court proceedings. I also know that too often dispatchers may be forced to act as hostage negotiators and, in some instances, they may even have to provide life-saving first aid until first responders can arrive. Furthermore, the decisions dispatchers make can impact not only the lives of callers, but also the lives of many others. For example, in the immediate aftermath of the San Bernardino shooting, it was a 9-1-1 dispatcher who took the initial emergency call and helped law enforcement track down the shooters. Just as other first responders, our public safety telecommunicators must remain calm and use their training to think quickly about how best to respond to an emergency, and without the unique skills and abilities of our dispatchers, first responders would simply be unable to do their jobs.

It is clear that our dispatchers do not simply provide administrative support but are an important part of the first responder community. This is a specialized occupation that requires professionals to think critically and use skills and training that are vital to the lifesaving efforts of first responders. I sincerely hope OMB will take these factors into account as it adopts its revised SOC and therefore urge you to categorize public safety telecommunicators appropriately as a "Protective Service Occupation."

Thank you for your attention to this request.

Sincerely,



Norma J. Torres
Member of Congress