

**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
2018 STANDARD OCCUPATIONAL CLASSIFICATION**

**Standard Occupational Classification (SOC)—Updates for 2028
Docket ID: BLS-2024-0001**

TABLE OF CONTENTS

I.	Executive Summary	1
II.	About the Association of Public-Safety Communications Officials (APCO)	1
III.	Moving Public Safety Telecommunicators to the Protective Service Occupations Major Group is Necessary to Reflect the Modern Workforce	2
A.	The Work Performed by Public Safety Telecommunicators is Protection of Life and Property	2
i.	Understanding the Different Specialties and Training for Public Safety Telecommunicators	3
ii.	Data Quantifying the Protective Work Performed by Public Safety Telecommunicators	5
B.	The Work has Become More Protective	6
i.	How 9-1-1 has Changed Since the SOC was Created	6
ii.	Significant Changes Since Adoption of the 2018 SOC	8
1.	Live Video-to-911	8
2.	Tactical Dispatch	9
3.	Increased Training Requirements	10
4.	New Findings on the Hazards of the Work	10
iii.	SOC Classification Principles and Coding Guidelines Support Classification of Public Safety Telecommunicators as Protective Service Occupations	11
C.	The SOC's Definition of Public Safety Telecommunicators Should be Updated	12
IV.	Aligning the SOC with other Federal Data Programs	12
A.	Centers for Disease Control and Prevention	13
B.	Department of Labor	13
i.	National Compensation Survey	13
ii.	The Directory of Occupations	14
iii.	SOC Mapping to the International Standard Classification of Occupations	14
C.	Department of Education	15
D.	Other Federal Agencies Consider the Work Performed by Public Safety Telecommunicators to be a Protective Service	15
V.	The Current Classification Undermines Effective Occupational Research	16
A.	Occupational Hazards	16
i.	Work-Related Mental Health Impacts	16
ii.	Workplace Exposure to Infectious Diseases	16
B.	Workforce Development Needs	17

C.	Job Satisfaction and Retention	17
VI.	The Benefits of Modernizing the SOC Outweigh Justifications for Perpetuating the Status Quo	17
A.	Moving Occupations to a Different Major Group is Not Uncommon	18
B.	Separating Public Safety Telecommunicators from Other Dispatchers in the Office and Administrative Support Occupations Would Not be Confusing	18
VII.	Conclusion.....	18

I. Executive Summary

For the Standard Occupational Classification (SOC) to reflect the modern workforce and remain consistent with its classification principles, Public Safety Telecommunicators should be classified as Protective Service Occupations. The work performed by Public Safety Telecommunicators has become increasingly lifesaving and skilled, particularly since the previous revision of the SOC. To quote President Biden, “Every day across our country, Public Safety Telecommunicators come to the aid of their fellow Americans when they are needed most... Whether they are giving CPR instructions to a bystander assisting someone in cardiac arrest, dispatching emergency medical services in response to a car crash, aiding law enforcement in keeping our communities safe, or helping a crime victim get the support they need, Public Safety Telecommunicators are a lifeline for so many.”¹

To assist the SOC Policy Committee, we provide a detailed description of the modern work performed by Public Safety Telecommunicators with an emphasis on statistics and how the occupation has changed since the previous SOC revision. Technological advancements such as the introduction of live video-to-911 capabilities, expanded responsibilities such as crisis counseling and de-escalation, and increased professionalization and training requirements have enhanced Public Safety Telecommunicators’ ability to protect life and property.

Additionally, we provide a data-oriented overview of how classifying Public Safety Telecommunicators as Protective Service Occupations would serve the SOC’s purpose of supporting efficiency and effectiveness of the U.S. federal statistical system by aligning the SOC with other federal data programs and assessments. We also demonstrate several ways in which occupational research would be improved by modernizing the classification.

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, potentially saving their lives and the lives of their loved ones. Law enforcement, fire/rescue, and emergency medical personnel rely on Public Safety Telecommunicators for their own safety and as a partner for protecting life and property. The work they perform goes beyond robotically receiving requests and dispatching resources. It’s life or death, and the current classification in the SOC should be changed.

II. About the Association of Public-Safety Communications Officials (APCO)

With more than 40,000 members, APCO International is the world’s largest association of Public Safety Telecommunicators. APCO has a long history of providing training, certifications, 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.

¹ Letter from President Biden to Recognize National Public Safety Telecommunicators Week (Apr. 14, 2024), available at <https://www.npstw.org/presidential-letter-for-national-public-safety-telecommunicators-week/>.

III. Moving Public Safety Telecommunicators to the Protective Service Occupations Major Group is Necessary to Reflect the Modern Workforce

Public Safety Telecommunicators 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, and other occupations in the SOC’s wide-ranging major group for Protective Service Occupations. Classification within the Office and Administrative Support major group is outdated.

The work performed by Public Safety Telecommunicators is a protective service and has evolved significantly since they were first listed in the SOC, and this evolution has accelerated in recent years with the introduction of advanced communications technology.

A. The Work Performed by Public Safety Telecommunicators is Protection of Life and Property

Job descriptions for Public Safety Telecommunicators are often outdated, perhaps by decades, and fail to adequately describe the work performed. Based on APCO’s knowledge and representation of its 40,000 members, a modern job description would be:

- Administer care by providing pre-arrival medical instruction or directing callers through procedures such as CPR, childbirth, or controlling of blood loss before emergency medical services are on scene.
- Gather, analyze, and report critical information during life-or-death situations such as crimes in progress, medical emergencies, and fire/rescue incidents.
 - 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.
 - Public Safety Telecommunicators act as investigators 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.
- Manage communications of emergency personnel responding to incidents and assist with incident operations during events such as active shooter and officer down responses.
 - Work with field units during an active shooter incident to establish a perimeter, determine who should evacuate and who should shelter in place, and coordinate a multi-agency response.
- Take protective actions for first responders by providing life-safety information during responses such as officer down and mayday calls.
 - 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 who might need to determine the location of the wounded responder and initiate rescue procedures.
- Analyze conflicting and/or limited location information to direct first responders to the scene.

- Counsel suicidal callers and negotiate with hostage takers to prevent them from harming themselves or others.
- Deploy to the scene of planned events, major emergencies, or ongoing incidents.

Public Safety Telecommunicators perform this type of work every day and when seconds matter. Public Safety Telecommunicators must obtain critical information *immediately* – such as the location of the emergency and the nature of the incident – before they can begin administering life-saving instruction or directing field responders to the scene. The actions they take are often performed under intense and harrowing circumstances when the caller might be screaming, hysterical, disoriented, or severely injured and in pain. Whether answering a phone call to 9-1-1 or a request for assistance from a first responder over the radio, the Public Safety Telecommunicator’s work can make the difference between life and death. Examining the different specialties and training for Public Safety Telecommunicators and reviewing data quantifying the protective nature of the work will further demonstrate that they should be classified as Protective Service Occupations.

i. Understanding the Different Specialties and Training for Public Safety Telecommunicators

The job description above applies broadly to the work performed by Public Safety Telecommunicators, but not all Public Safety Telecommunicators perform all those tasks. Public safety agencies are set up differently depending on their size and jurisdiction. In many Emergency Communications Centers (ECCs), Public Safety Telecommunicators simultaneously perform call-taking and dispatch functions. However, in some ECCs, 9-1-1 call-taking and emergency dispatch are separated (although even in this situation it is common to be cross-trained in call-taking and dispatch operations). Regardless of whether the functions are separate or combined, each Public Safety Telecommunicator’s job is protection of life and property.

Some Public Safety Telecommunicators specialize in law enforcement, fire/rescue, or emergency medical services. According to an evaluation by multiple federal agencies that predated the prior SOC revision, most Public Safety Telecommunicators provide pre-arrival medical instructions to 9-1-1 callers.² Rather than focus on a single skillset such as the provision

² The North American Product Classification System (NAPCS) is a classification system for market or demand-based products. See Economic Classification Policy Committee of the United States, *Overview of NAPCS Objectives, Guidance, and Implementation Strategy and Goals: A United States Perspective*, NAPCS Discussion Paper for Trilateral Steering Group Meeting (April 2003), available at <https://www.census.gov/naics/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. 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.” See Frequently Asked Questions (FAQs) About NAPCS, UNITED STATES CENSUS BUREAU (last visited July 26, 2024), <https://www.census.gov/naics/napcs/>. A NAPCS document intended to provide a definition for “Emergency help and dispatch services” – which equate to Public Safety Telecommunicator services – states that “Most call takers also provide emergency self-help or pre-arrival instructions to the caller.” See United States Census Bureau, *NAPCS Product List for NAICS 62191: Ambulance Services*, available at <https://www2.census.gov/library/reference/napcs/product-list/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 table 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

of medical instructions, however, the SOC Policy Committee should consider the various specializations collectively to understand the nature of the work performed by these occupations.

The following examples of training courses for Public Safety Telecommunicators reflect the diversity of the skills required for these occupations and their specializations:

- Active Shooter Incidents for Public Safety Communications
- Call Processing Incidents Involving Veterans with PTSD
- Crisis Negotiations for Telecommunicators
- Disaster Operations and the Communications Center
- Emergency Medical Dispatcher
- Fire Service Communications
- Law Enforcement Communications
- Telecommunicator CPR³

Regardless of their specialties, Public Safety Telecommunicators have extensive training and certification requirements, which in some cases are imposed by state law. 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.⁴ In the District of Columbia, Public Safety Telecommunicators' training consists of 14 weeks of classroom instruction and 12 weeks of on-the-job training with a Communications Training Officer, plus 40 hours of annual continuing education. These examples are comparable to what other agencies report across the country. In the discussion below of changes since the 2018 SOC was adopted, we provide information on changes to state-level training requirements.

Public Safety Telecommunicators have training requirements even if they are not imposed by state law. For example in Anchorage, Alaska, where there is no statutory requirement, Public Safety Telecommunicators go through 240 hours of initial training, plus an average of 5-6 months of on-the-job training for call-takers and an additional 8-10 months for dispatchers.⁵ As another example, Oklahoma does not have statutory requirements, but its 9-1-1 Management Authority has published minimum training standards to serve as a model for the adoption of standards at the local level that are tailored to local needs and resources.⁶

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 (last visited July 26, 2024), <https://www.census.gov/naics/napcs/?108967>; see also [NAPCS Phase I-III Product Lists](#), UNITED STATES CENSUS BUREAU (last visited July 26, 2024), <https://www.census.gov/naics/napcs/?108967>.

³ For more examples, see [APCO Training Catalog](#), APCO INTERNATIONAL (last visited Jul. 26, 2024), <https://www.apcointl.org/training/courses/catalog/>.

⁴ [911 Public Safety Telecommunicator Program](#), FLORIDA HEALTH (last visited Jul. 26, 2024), <http://www.floridahealth.gov/licensing-and-regulation/911-public-safety-telecommunicator-program/index.html>.

⁵ [Dispatch – Emergency Communications Center](#), ANCHORAGE POLICE DEPARTMENT (last visited Jul. 26, 2024), <https://www.anchoragepolice.com/dispatch>.

⁶ Oklahoma 911 Management Authority, [OKLAHOMA 9-1-1 CALL TAKER MINIMUM TRAINING STANDARDS](#) (Nov. 5, 2020), available at <https://www.ok.gov/911/documents/11Oct22%20Minimum%20Training%20Standards.pdf>.

ii. Data Quantifying the Protective Work Performed by Public Safety Telecommunicators

Statistics cannot fully describe the public safety impacts and protective nature of the work performed by Public Safety Telecommunicators (or any other occupation). Anticipating that the SOC Policy Committee will give significant weight to data, APCO identified representative metrics and gathered data from ECCs to attempt to quantify the protective nature of the work.

Being trained to provide medical instructions is one measure of the protective nature of the work. As noted above, “most” Public Safety Telecommunicators provide pre-arrival medical instructions to 9-1-1 callers.⁷ Estimating certifications in Emergency Medical Dispatch (EMD) can further quantify the degree of medical instruction. (Note, however, Public Safety Telecommunicators at some agencies provide medical instruction without specific certifications.) According to a 2018 APCO survey, 63% of Public Safety Telecommunicators performed EMD.⁸ It’s likely that the percentage has increased in recent years due to new state-level training requirements and a general increase in training.

According to APCO’s analysis, Public Safety Telecommunicators coach callers through cardiopulmonary resuscitation (CPR) approximately 320,000 times per year.⁹ The American Heart Association has estimated that this “Telecommunicator-CPR” can *double* the rate of survival for a patient in cardiac arrest.¹⁰ This amounts to thousands of lives saved by Public Safety Telecommunicators annually, solely from coaching 9-1-1 callers through CPR. As described by the AHA:

“In partnership with the 9-1-1 caller, telecommunicators have the first opportunity to identify a patient in cardiac arrest and provide initial care by delivering CPR instructions while quickly dispatching emergency medical services. The telecommunicator and the caller form a unique team in which the expertise of the telecommunicator is provided just in time to a willing caller, transforming the caller into a lay rescuer delivering CPR. The telecommunicator CPR (T-CPR) process, also previously described as dispatch CPR, dispatch-assisted CPR, or telephone CPR, represents an important opportunity to improve survival from sudden cardiac arrest.”¹¹

⁷ See *supra* note 2.

⁸ APCO International, PROJECT RETAINS: STAFFING AND RETENTION IN PUBLIC SAFETY ANSWERING POINTS (PSAPs): A SUPPLEMENTAL STUDY (Jul. 2018).

⁹ This estimate was derived using data from APCO’s members about the percentage of 9-1-1 calls handled by their centers that require Telecommunicator-CPR, multiplied by the Federal Communications Commission’s estimated number of 9-1-1 calls in 2023. Federal Communications Commission, FIFTEENTH ANNUAL REPORT TO CONGRESS ON STATE COLLECTION AND DISTRIBUTION OF 911 AND ENHANCED 911 FEES AND CHARGES, at 16, tbl.3 (2023), available at <https://www.fcc.gov/sites/default/files/15th-annual-911-fee-report-2023.pdf>. This estimate aligns with the American Heart Association’s report that there are approximately 356,000 out-of-hospital cardiac arrests annually in the U.S. and that the majority of incidents result in a 9-1-1 call. See Connie W. Tsao, *et al.*, *Heart Disease and Stroke Statistics – 2022 Update: A Report from the American Heart Association*, 145 CIRCULATION 153 (Feb. 22, 2022), available at <https://www.ahajournals.org/doi/10.1161/CIR.0000000000001052>.

¹⁰ Michael Christopher Kurz, *et al.*, *Telecommunicator Cardiopulmonary Resuscitation: A Policy Statement From the American Heart Association*, 141 CIRCULATION 686 (Mar. 24, 2020), available at <https://www.ahajournals.org/doi/10.1161/CIR.0000000000000744>.

¹¹ *Id.*

We also gathered data on the frequency with which Public Safety Telecommunicators respond to emergencies for callers experiencing a mental health crisis. This, too, is an example of the high-stakes work performed by Public Safety Telecommunicators, particularly for suicidal callers. Public Safety Telecommunicators use crisis negotiation skills to prevent the situation from getting worse. They are trained to be empathetic and prioritize safety for the caller, bystanders, and first responders. These calls can be dangerous and traumatic. According to APCO's analysis, Public Safety Telecommunicators handle emergencies with suicidal callers approximately 2,230,000 per year.¹² This likely translates to thousands of lives saved by Public Safety Telecommunicators.

Of course, Public Safety Telecommunicators perform protective work for a variety of emergencies, not only cardiac arrest and suicidal persons. They perform protective work when handling incidents involving assaults, structure fires, motor vehicle accidents, wildfires, childbirths, active shooters, and other types of emergencies.

B. The Work has Become More Protective

The work has become more protective since Public Safety Telecommunicators were first listed in the SOC, and in the years since the previous revision, modern technologies and operational responsibilities have made it even more appropriate to classify them as Protective Service Occupations.

i. How 9-1-1 has Changed Since the SOC was Created

The work performed by Public Safety Telecommunicators has completely changed over the last forty years. The way people communicate – and thus the way they reach 9-1-1 – has changed dramatically, from wired telephones limited to homes and offices, to video-enabled smartphones. At the same time, policies and procedures in the law enforcement, fire, and emergency medical services fields have evolved. Both trends have led to new capabilities and responsibilities for Public Safety Telecommunicators to protect the public and first responders.

When 9-1-1 first began, it was accurate to characterize the officials answering calls and dispatching first responders as Office and Administrative Support Occupations. Calls were answered by secretaries, jailers, or whoever was closest to the phone, and they wrote brief notes on cards to keep a record of calls for service. Their role was limited by the technology and operational procedures of the time. For dispatching, it wasn't common for every police officer to have a handheld radio until the end of the 1980s.¹³ Before that, dispatch involved tools like one-way AM radio broadcasts for law enforcement response or community fire horns that used codes to inform firefighters of the location of the fire. Because communications were so limited, early 9-1-1 professionals simply collected and relayed basic information for a response. Thus, when the SOC first classified Public Safety Telecommunicators (then as Police, Fire, and Ambulance Dispatchers), the job was somewhat similar to being a taxicab dispatcher.

¹² This estimate was derived using data from APCO's members about the percentage of 9-1-1 calls handled by their centers that involve suicidal callers, multiplied by the Federal Communications Commission's estimated number of 9-1-1 calls in 2023.

¹³ Frank Broelli, The Evolution of Police Communications (and What's Still Ahead), OFFICER.COM (Jul. 23, 2015), <https://www.officer.com/command-hq/technology/communications/dispatch-technology/article/12078073/let-magazine-july-2015-the-evolution-of-police-communications-and-whats-ahead>.

Today, working as a Public Safety Telecommunicator requires a completely different professional skillset. This is partially attributable to advancements in the other public safety disciplines. For example, the development of EMS and hostage negotiation teams did not take place until after 9-1-1 began as a service.¹⁴ Over the past thirty years, training and certification standards for Public Safety Telecommunicators have been established in areas such as emergency medical dispatch, active shooter scenarios, and crisis negotiation to reflect the ability and expectation for these professionals to perform more advanced protective work. The first program to provide CPR instructions by telephone was introduced in the 1980s, and it wasn't until the '90s that Early Public Access Defibrillation programs were developed, which increased the complexity and importance of having well-trained Public Safety Telecommunicators who could instruct 9-1-1 callers in how to resuscitate cardiac arrest victims.¹⁵

The primary driver of the change in Public Safety Telecommunicators' work has been the technology revolution. Cellphones, first responder radios, vehicle telematics (i.e., data provided by a service such as OnStar for an accident about the speed, impact, number of passengers, potential injuries, etc.), text messaging, and public alerting – just to name a few – have significantly changed the way these professionals communicate with the public and first responders. Reflecting these changes, 9-1-1 operations have also shifted over time into specialized communications centers or units within law enforcement, fire, or EMS departments.

When 9-1-1 began, not only did many people lack a phone in their housing unit, 13% reported that no telephone was available to them at all.¹⁶ Now, nearly every adult and 95% of teens ages 13-17 have phones in their pockets.¹⁷ The adoption of rules by the Federal Communications Commission in 2014 to promote widespread text-to-911 availability provided another critical pathway for the cellphone-equipped public to seek emergency assistance.¹⁸ The rapid growth of mobile services and modern professional training gave Public Safety Telecommunicators both the ability and responsibility to play a greater role during emergencies by gathering information and giving advice that can make the difference between life and death.

Public Safety Telecommunicators can give medical instructions for first aid, which was not possible before unless the victim happened to be within arm's reach of a landline phone. When there's an automobile accident, they can analyze vital information directly from the scene through bystanders and vehicle telematics to determine whether extrication and advanced life

¹⁴ The first 9-1-1 call was made in 1968. Consider that for EMS, advanced life support training didn't exist until 1979 and wasn't required for paramedics until the mid-1980s. Dennis Edgerly, *Birth of EMS: The History of the Paramedic*, J. of Emer. Med. Servs. (Oct. 8, 2013), available at <https://www.jems.com/administration-and-leadership/birth-ems-history-paramedic/>. The first hostage negotiation team was created in the 1970s by the New York Police Department. Jeff Thompson, "Crisis" or "Hostage" Negotiation? The Distinction Between Two Important Terms, Federal Bureau of Investigation Law Enforcement Bulletin (Mar. 5, 2014), available at <https://leb.fbi.gov/articles/featured-articles/crisis-or-hostage-negotiation-the-distinction-between-two-important-terms#:~:text=Both%20situations%20would%20be%20considered,law%20enforcement%20negotiators%20will%20respond.>

¹⁵ [History of CPR](#), AMERICAN HEART ASSOCIATION: CPR & FIRST AID EMERGENCY CARDIOVASCULAR CARE (last visited Jul. 26, 2024), <https://cpr.heart.org/en/resources/history-of-cpr>.

¹⁶ The number of households with telephones "available" is from the 1970 Census. See United States Census Bureau, Historic Census of Housing Tables: Telephones (2000), available at <https://www2.census.gov/programs-surveys/decennial/tables/time-series/coh-phone/phone-tab.txt>.

¹⁷ Alexis Bazen, [Cell Phone Statistics 2024](#), CONSUMER AFFAIRS (Dec. 12, 2023), https://www.consumeraffairs.com/cell_phones/cell-phone-statistics.html?t&utm_source=perplexity.

¹⁸ See Facilitating the Deployment of Text-to-911 and Other Next Generation 911 Applications; Framework for Next Generation 911 Deployment, PS Docket Nos. 11-153, 10-255, *Second Report and Order*, 29 FCC Rcd 9846 (2014).

support resources are needed. During major incidents such as natural disasters, terrorist attacks, and active shooters, Public Safety Telecommunicators can receive an overwhelming influx of reports (including from the perpetrator of an attack) and must quickly triage and analyze calls to prevent further harm and protect field responders. When someone is being abducted, Public Safety Telecommunicators can sometimes covertly remain in contact with the victim to detect threat-related information and use increasingly sophisticated tools for tracking the device's location. Text-to-911 is used by victims of domestic violence afraid to be heard, and by suicidal persons not comfortable making a voice call, requiring great care and skill on the part of the Public Safety Telecommunicator given the special sensitivity, immediacy, and danger involved with such pleas for help. Text-to-911 is also a lifeline to those who are deaf or hard of hearing, or hiding for their lives when a home intruder or active shooter is threatening. The personal connection made possible by voice and text over cellphones has increased the frequency with which Public Safety Telecommunicators counsel suicidal persons, domestic violence victims, and children, or serve as the primary contact with a hostage taker. All these developments have occurred since the early days of 9-1-1.

Public Safety Telecommunicators' work with first responders has also changed. For example, whereas forty years ago the 9-1-1 center might only know an officer was in trouble if a bystander used a landline to call them, today the Public Safety Telecommunicator can know when a vehicle stop has been made, if the officer's weapon is drawn, and may even have access to live video from the scene. This empowers them to better protect first responders. Further, advanced technologies such as body cameras, gunshot detection, and real-time location tracking are increasing Public Safety Telecommunicators' ability to identify when first responders are in danger and take steps to protect their lives.

ii. Significant Changes Since Adoption of the 2018 SOC

In the years since the SOC was last revised, Public Safety Telecommunicators have adopted new tools that enhanced the protective nature of their work, increased training requirements, and been identified through data analysis as facing workplace hazards common to Protective Service Occupations.

1. Live Video-to-911

One of the most impactful changes to the work performed by Public Safety Telecommunicators has been the ability to receive live video from 9-1-1 callers. This allows 9-1-1 professionals to gain real-time visual information during emergencies, which can greatly enhance their ability to protect and save lives. For example, with live video from the caller:

- If someone is choking, a Public Safety Telecommunicator can visually confirm that the caregiver is performing abdominal thrusts correctly, increasing the chances of a successful intervention and patient survival.
- In cases of natural disasters like floods or fires, seeing the extent of damage can help Public Safety Telecommunicators allocate appropriate resources and give more precise instructions to responders on the ground.

- If a caller is reporting a burglary in progress, the Public Safety Telecommunicator can identify the number of suspects, their locations, and whether they are armed, thereby improving officer safety and tactical planning.

Video-to-911 capabilities were first offered as a mainstream solution for ECCs in the years following the previous SOC revision. While not every ECC has adopted a video-to-911 solution, it has shifted from a “bleeding edge” technology to a popular feature ECCs have either deployed or are planning to deploy. For example, one of several providers of this technology announced that in 2023, just a year after launch, its solution had been adopted by ECCs covering 18% of the population.¹⁹ This year Apple announced new integrations that will enable seamless use of video-to-911 on iPhones. According to one of its integration partners, this will result in support for video-to-911 by ECCs that collectively cover over 99% of the U.S.²⁰

2. Tactical Dispatch

Public Safety Telecommunicators often get deployed to the field to assist with emergency communications at the scene. This can be due to preplanned events or incidents like SWAT call-outs. Further, due to the unique nature of emergency communications centers requiring that daily operations continue regardless of circumstance, standards-based²¹ specially qualified and trained teams of Public Safety Telecommunicators known as a Telecommunicator Emergency Response Taskforce (TERT) often deploy to areas stricken by a man-made or natural disaster to provide operational support. They provide relief for their fellow Public Safety Telecommunicators who needed to stay at their posts – often for days on end – regardless of the surrounding threat including to the safety and security of their own homes and loved ones.

Additionally, secure and robust wireless broadband communications capabilities such as those that have become available from the FirstNet Authority enable Public Safety Telecommunicators to deploy to mobile command posts with the same technical capabilities of their ECCs. These command posts are established for large-scale, high-profile events and for longer-term response and recovery efforts.²²

Under any tactical dispatch scenario, Public Safety Telecommunicators place themselves at physical risk, by travelling to dangerous scenes or inhabiting emergency communications centers that may be physically damaged yet must remain operational as the sole lifeline to those impacted by a serious incident.

¹⁹ Michael Chime, *Prepared partners with 10% of US 911 centers*, PREPARED BLOG (Apr. 4, 2023), <https://www.prepared911.com/content/prepared-partners-with-10-of-us-911-centers>.

²⁰ *RapidSOS Will Be Integrated With Apple Emergency SOS Live Video*, RAPIDSOS BLOG (last visited Jul. 26, 2024), https://rapidsos.com/rapidsos-will-be-integrated-with-apple-emergency-sos-live-video/?utm_medium=email&hsenc=p2ANqtz-91QcRNJ7IX7JPbAUDS-u_lxi5oc82_k4QsSYyB03wiPOkKHrKvT_nx21O_Q5fpw7Jg2eRTf_zMlsmZiYMNrjdz_gFfww&hsmi=314314191&utm_content=314314191&utm_source=hs_email.

²¹ *See Standard for Telecommunicator Emergency Response Taskforce (TERT) Deployment*, APCO International et al. (Apr. 2015), available at <https://www.apcointl.org/~documents/standard/11051-2015-tert/?layout=default>.

²² For example, following a recent major flood in Spencer, Iowa, Public Safety Telecommunicators were tactically dispatched to a mobile command vehicle for 15 days spanning June 25 to July 9.

3. Increased Training Requirements

Since the previous SOC revision, it has become more common for Public Safety Telecommunicators to be subject to minimum training requirements set by state law. According to data published in 2022 by the National 9-1-1 Office (which is housed within the National Highway Traffic Safety Administration), only seven states lacked statutory minimum training standards.²³ Of those states that were identified in the report as lacking statutory training standards, APCO verified that at least two have statutory requirements.²⁴

The type of training Public Safety Telecommunicators receive has become more sophisticated and indicative of the increasingly protective and impactful nature of their work. There are many types of training and metrics that would provide indications of the lifesaving work and hazards associated with the profession. To evaluate changes since the previous SOC revision, APCO examined data on two helpful proxies for assessing the lifesaving work and physical risk these professionals face: training in Emergency Medical Dispatch and Tactical Dispatch.

According to an APCO survey in 2016, 78% of ECCs had tactical dispatch programs in which Public Safety Telecommunicators operate in the field outside of ECCs. Of those that responded that they did not have such a program, more than half indicated that their agency was considering policies or a training program to have Public Safety Telecommunicators operate in the field. As noted above, according to a separate APCO survey in 2018, 63% of Public Safety Telecommunicators were certified to perform EMD. (As a reminder, because ECCs and Public Safety Telecommunicators sometimes specialize in law enforcement, fire/rescue, or emergency medical services, it would be unexpected for 100% of Public Safety Telecommunicators to be trained in EMD or for 100% of ECCs to have tactical dispatch programs.)

Since those surveys and the previous SOC revision, APCO has trained 49,637 Public Safety Telecommunicators in Emergency Medical Dispatch or Tactical Dispatch. This is roughly half of all Public Safety Telecommunicators in the country, and APCO is not the only provider of this type of training. APCO's data on the increased training in Emergency Medical Dispatch aligns with new state-level requirements. Several states have enacted legislation that imposed new medical instruction training requirements for Public Safety Telecommunicators.²⁵

4. New Findings on the Hazards of the Work

²³ National Highway Traffic Safety Administration, DEVELOPING A PUBLIC SAFETY TELECOMMUNICATOR JOB DESCRIPTION, at 34-35 (May 2022), available at https://www.911.gov/assets/N911-Program_BLS_Toolkit_Parts_1-4_08JUNE2022_Final.pdf.

²⁴ Alabama adopted training requirements in 2022. See [FAQ](https://www.al911board.com/taxonomy/term/42?page=1#:~:text=All%20PSTs%20hired%20after%20July,day%20of%20the%20hire%20date), ALABAMA 911 BOARD (last visited Jul. 26, 2024), <https://www.al911board.com/taxonomy/term/42?page=1#:~:text=All%20PSTs%20hired%20after%20July,day%20of%20the%20hire%20date>. Minnesota enacted T-CPR requirements effective in 2019. See H.F. 1520, 91st Leg. (Mn. 2019), available at https://www.revisor.mn.gov/bills/text.php?number=HF1520&version=latest&session=90&session_number=0&session_year=2019. Georgia also recently enacted T-CPR requirements effective Jan. 1, 2024. See S.B. 505, 2021-2022 Reg. Sess. (Ga. 2022), available at <https://www.legis.ga.gov/legislation/62052>.

²⁵ According to the National Conference of State Legislatures 9-1-1 legislation tracking database, T-CPR laws were enacted in Arkansas, Virginia, Florida, Rhode Island, South Carolina, Texas, and Wisconsin in the years since the previous SOC revision. [911 Legislation Database](https://www.ncsl.org/technology-and-communication/911-legislation-database), NATIONAL CONFERENCE OF STATE LEGISLATURES (last updated Jul. 20, 2024), <https://www.ncsl.org/technology-and-communication/911-legislation-database>.

Since the previous SOC revision, research has demonstrated that the nature of the work Public Safety Telecommunicators perform is hazardous to their health. In 2019 and 2022, the U.S. Marshals Service published findings on the mental health of the nation's public safety professionals, including Public Safety Telecommunicators.²⁶ This research provided the most comprehensive insights to date of the impacts of working in emergency response. The rates of anxiety, depression, and posttraumatic stress disorder (PTSD) for Public Safety Telecommunicators, like their counterparts in other public safety disciplines, were significantly elevated. According to the findings for Public Safety Telecommunicators:

- One in seven reported recent thoughts of suicide.
- 58% were experiencing some degree of depression (17% moderate to severe depression).
- 56% were experiencing some degree of anxiety (30% moderate to severe anxiety).
- 18% showed clinically significant signs of PTSD.²⁷

These findings distinguish the work performed by Public Safety Telecommunicators from occupations in the Office and Administrative Support major group. As explained below, these findings confirm that classifying Public Safety Telecommunicators as a Protective Service Occupation will support research into occupational hazards, particularly with regard to the mental health impacts arising from the trauma encountered by emergency response personnel.

iii. SOC Classification Principles and Coding Guidelines Support Classification of Public Safety Telecommunicators as Protective Service Occupations

The evolution of the work performed by Public Safety Telecommunicators since they were first classified in the SOC, and certainly the technology-driven changes in the years since the previous SOC revision, warrant modernizing the classification to Protective Service Occupations. According to SOC Classification Principle #2, "Occupations are classified based on work performed and, in some cases, on the skills, education and/or training needed to perform the work."²⁸ The similarities between the work performed, skills, and training needed by Public Safety Telecommunicators and other Office and Administrative Support Occupations has radically diminished. The work performed by modern Public Safety Telecommunicators is fundamentally protection of life and property, to a greater extent than many current Protective Service Occupations.

The current classification of Public Safety Telecommunicators is an outlier in what would otherwise be an SOC structure that emphasizes qualitative aspects of the work rather than quantitative. In other words, for most Protective Service Occupations, the fact that the work's focus is protection of life and property matters more than the percentage of time spent saving lives versus performing work that is not actively protective. This aligns with Coding Guideline

²⁶ J.R. Blalock, *et al.*, *Emergency Communication Operators: Findings From the National Wellness Survey for Public Safety Personnel*, J. OF POLICE AND CRIM. PSYCH., 39 (Jul. 4, 2023), available at <https://link.springer.com/article/10.1007/s11896-023-09599-x#citeas>.

²⁷ *Id.*

²⁸ Executive Office of the President, Office of Management and Budget, *Standard Occupational Classification Manual*, at 9 (2018) ("SOC Manual"), available at https://www.bls.gov/soc/2018/soc_2018_manual.pdf.

#2: “When workers in a single job could be coded in more than one occupation, they should be coded in the occupation that requires the highest level of skill.”²⁹

Lifeguards, playground monitors, bailiffs, firefighters, gambling surveillance monitors, and others in the Protective Service Occupations major group may spend the majority of their time in a state of readiness, not having to take protective action. The common theme for those jobs is not the amount of time spent actively saving lives and property or the tools with which the work is performed. The common theme is that the nature of the work is protective and qualitatively different from occupations listed in other major groups. The nature of the work performed by Public Safety Telecommunicators operating in secure facilities is no more clerical than a criminal investigator using a computer to gather or compile evidence. And the highest level of skill required, whether providing medical instructions, analyzing live video of an assault in progress, or calming a suicidal caller, is infinitely more a protective service than it is administrative.

C. The SOC’s Definition of Public Safety Telecommunicators Should be Updated

Along with moving Public Safety Telecommunicators to the Protective Service Occupations major group, based on the changes in the work performed, the SOC’s description of the work performed should be revised (as shown in red):

Operate telephone, radio, or other communication systems to receive and communicate requests for emergency assistance at 9-1-1 public safety answering points, **emergency communications centers**, and emergency operations centers. **Take** Gather and analyze information from the public and other sources regarding crimes, threats, disturbances, acts of terrorism, fires, medical emergencies, and other public safety matters. **May** **e**Coordinate and provide information to law enforcement and emergency response personnel **regarding scene safety, response needs, and ongoing changes for emergency incidents**. May access sensitive databases and other information sources as needed. May provide additional instructions to callers based on knowledge of and certification in law enforcement, fire, or emergency medical procedures. **May operate alongside responders in the field to enhance incident communications.**

IV. Aligning the SOC with other Federal Data Programs

According to OMB, “The SOC supports efficiency and effectiveness of the U.S. Federal statistical system by providing a standard for occupation-based statistical data classification, thereby ensuring comparability of these data across Federal statistical agencies.”³⁰ However, the current classification of Public Safety Telecommunicators as an Office and Administrative Support Occupation conflicts with several other federal data programs.

Public Safety Telecommunicators are generally classified in Protective Service or comparable categories in other classification systems. Classifying Public Safety

²⁹ *Id.* at 10.

³⁰ Statistical Policy Directive No. 10 Standard Occupational Classification (SOC) – Request for Comments on Possible Revision for 2028, 89 Fed. Reg. 49,911 (Jun. 12, 2024).

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 Centers for Disease Control and Prevention (CDC), Department of Labor, Department of Education, and International Labour Organization, as well as assessments made by the Federal Communications Commission, Department of Transportation, and Department of Homeland Security.

A. Centers for Disease Control and Prevention

In 2022, the CDC implemented a change to the National Violent Death Reporting System – the Public Safety Officer Suicide Reporting Module.³¹ The purpose of this data is to inform, develop, and tailor prevention. The CDC includes Public Safety Telecommunicators in the definition of “public safety officers.” Classifying Public Safety Telecommunicators as Protective Service Occupations would align with the CDC’s data collection and reflect a modern view of the work performed as more similar to other Protective Service Occupations than to Office and Administrative Support Occupations.

B. Department of Labor

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

i. National Compensation Survey

Guidance issued by the Department of Labor’s Bureau of Labor Statistics (BLS) for collecting compensation data deviates from the SOC and categorizes Public Safety Telecommunicators 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.³² 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.”³³

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.

³¹ Bridget H. Lyons, *National Violent Death Reporting System (NVDRS) Public Safety Officer Suicide (PSOS) Module*, National Center for Injury Prevention and Control, Division of Violence Prevention (Apr. 25, 2023), available at <https://www.nationalacademies.org/documents/embed/link/LF2255DA3DD1C41C0A42D3BEF0989ACAECE3053A6A9B/file/DD72EBB3A7D9E2CAEC572A9F587E73FA5AC6E5E17CF4?noSaveAs=1>.

³² See *Handbook of Methods: Chapter 8 National Compensation Measures*, UNITED STATES DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS, available at <https://www.bls.gov/opub/hom/pdf/ncs-20110404.pdf>.

³³ *National Compensation Survey: Guide for Evaluating Your Firm’s Jobs and Pay*, UNITED STATES DEPARTMENT OF LABOR, BUREAU OF LABOR STATISTICS, at 3, (May 2013) (“NCS Guide”), available at <https://www.bls.gov/mwe/factsheets/ncs-leveling-guide-for-evaluating-your-firms-jobs-and-pay.pdf>.

Although the guide generally follows the SOC system to classify occupations, the section of the guide for Protective Service Occupations includes Public Safety Telecommunicators.³⁴ 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.³⁵

ii. The Directory of Occupations

The Department of Labor’s Directory of Occupations deviates from the SOC and categorizes the equivalent of Public Safety Telecommunicators as Protective Service Occupations. 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.³⁶ The Directory of Occupations is used for wage determinations in government service contracts covered under the SCA.

iii. SOC Mapping to the International Standard Classification of Occupations

In guidance developed by BLS and approved by the SOC Policy Committee, Public Safety Telecommunicators have been designated as Protective Service Occupations for the purpose of mapping the SOC to 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.³⁷ In 2012, the SOC Policy Committee approved a “crosswalk” developed by BLS to map occupations between the SOC and ISCO.³⁸ While it does not appear that BLS has published an updated crosswalk since the 2018 SOC was adopted,³⁹ the prior crosswalk mapped Public Safety Telecommunicators to the ISCO listing for “Protective Services Workers Not Elsewhere Classified.”⁴⁰ This ISCO group includes many other occupations from the SOC’s Protective Service Occupations major group. In contrast, the SOC’s non-emergency dispatchers were

³⁴ Because the guide predates the 2018 SOC, it uses the term “Police, Fire, and Ambulance Dispatchers.”

³⁵ NCS Guide at 44-45.

³⁶ SCA Wage Determinations, UNITED STATES DEPARTMENT OF LABOR, WAGE AND HOUR DIVISION (last visited Jul. 26, 2024), <https://www.dol.gov/agencies/whd/government-contracts/prevaling-wage-resource-book/sca-wage-determinations#:~:text=SCA%20wage%20determinations%20set%20forth,of%20Service%20Contract%20Wage%20Determinations.>

³⁷ 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 its International Conference of Labour Statisticians, which is an agency within the United Nations. See International Standard Classification of Occupations, INTERNATIONAL LABOUR ORGANIZATION, (last visited Jul. 26, 2024), <https://ilostat.ilo.org/methods/concepts-and-definitions/classification-occupation/>.

³⁸ U.S. Bureau of Labor Statistics on Behalf of the Standard Occupational Classification Policy Committee, *Crosswalk Between the International Standard Classification of Occupations (ISCO-08) and the 2010 Standard Occupational Classification (SOC)* (Aug. 2012), available at https://www.bls.gov/soc/ISCO_SOC_Crosswalk_process.pdf.

³⁹ Crosswalks Between the 2018 SOC and Systems Used by Other Federal and International Statistical Agencies, U.S. BUREAU OF LABOR STATISTICS (last modified Dec. 6, 2017), <https://www.bls.gov/soc/2018/crosswalks.htm>.

⁴⁰ See U.S. Bureau of Labor Statistics on Behalf of the Standard Occupational Classification Policy Committee, *Crosswalk Between the 2008 International Standard Classification of Occupations to the 2010 SOC* (last updated, Jun. 2015), <https://www.bls.gov/soc/soccrosswalks.htm>.

matched to the ISCO's Transport Clerks, which is listed in the group for Numerical and Material Recording Clerks.

C. Department of Education

Classifying Public Safety Telecommunicators as Protective Service Occupations would better align 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. Instructional programs for Public Safety Telecommunicators are listed in this category, as opposed to a category for office or administrative support programs.⁴³

D. Other Federal Agencies Consider the Work Performed by Public Safety Telecommunicators to be a Protective Service

In addition to the data programs described above, several federal agencies consider the work performed by Public Safety Telecommunicators to be a protective service. The Federal Communications Commission⁴⁴ and Department of Transportation⁴⁵ have repeatedly recognized that the work performed by Public Safety Telecommunicators is lifesaving and "protective." The Department of Homeland Security classifies Public Safety Telecommunicators as "essential critical infrastructure workers," along with law enforcement, fire/rescue, emergency medical

⁴¹ Classification of Instructional Programs, DEPARTMENT OF EDUCATION, NATIONAL CENTER FOR EDUCATION STATISTICS (last visited Jul. 26, 2024), <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, at 1, available at https://nces.ed.gov/ipeds/cipcode/Files/Introduction_CIP2010.pdf.

⁴³ See Detail for CIP code 43.0399, NATIONAL CENTER FOR EDUCATION STATISTICS (last visited Jul. 26, 2024) (illustrating examples including instructional programs for Emergency Telecommunicator, Emergency Services Communications, and Public Safety Communications), <https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=56&cid=91578>.

⁴⁴ See *Legal and Regulatory Framework for Next Generation 911 Services*, Federal Communications Commission, (Feb. 22, 2013) ("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)"), available at https://apps.fcc.gov/edocs_public/attachmatch/DOC-319165A1.pdf. See also Letter from Jessica Rosenworcel, Federal Communications Commission Chair, to Shalanda Young, Office of Management and Budget Director (Apr. 15, 2024), available at <https://docs.fcc.gov/public/attachments/DOC-401843A1.pdf>.

⁴⁵ *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) ("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"), available at https://www.ems.gov/assets/Pandemic_Influenza_Recommendations_For_911_And_PSAPS.pdf.

services occupations, recognizing that the work performed by Public Safety Telecommunicators is critical to the health and safety of the community.⁴⁶

V. The Current Classification Undermines Effective Occupational Research

Classifying Public Safety Telecommunicators as a Protective Service Occupation would support research efforts that rely on the SOC. The examples below address research related to occupational hazards, workforce development needs, and job satisfaction and retention.

A. Occupational Hazards

i. Work-Related Mental Health Impacts

Classifying Public Safety Telecommunicators as Protective Service Occupations rather than Office and Administrative Support Occupations will improve research focused on workplace hazards related to mental health. As mentioned above, research has shown that Public Safety Telecommunicators suffer rates of anxiety, depression, and PTSD that are comparable to other public safety professionals that are classified as Protective Service Occupations, and the CDC's program for tracking public safety officer suicides includes Public Safety Telecommunicators. According to the Occupational Safety and Health Administration, workplace stress has been reported to cause 120,000 deaths in the U.S. each year.⁴⁷ This far exceeds the number of deaths from work-related injuries.⁴⁸

ii. Workplace Exposure to Infectious Diseases

For some physical hazards, Public Safety Telecommunicators face risks more comparable to Protective Service Occupations than Office and Administrative Support Occupations. During the COVID-19 pandemic, Public Safety Telecommunicators faced work-related exposure rates that were much higher than the average for Office and Administrative Support Occupations, but comparable to occupations in the Protective Service Occupations major group. According to a study of COVID exposures September 2020-June 2021, Protective Service Occupations had exposure rates at work of 48.8%.⁴⁹ The rate for Office and Administrative Support Occupations was 15.9%.⁵⁰ Separate research for a similar time period showed that ECCs reported exposure

⁴⁶ Advisory Memorandum on Identification of Essential Critical Infrastructure Workers During COVID-19 Response, Cybersecurity and Infrastructure Security Agency (Mar. 19, 2020) (including "911 call center employees" in the list of critical Law Enforcement, Public Safety, and Other First Responders), available at https://www.cisa.gov/sites/default/files/publications/CISA_Guidance_on_the_Essential_Critical_Infrastructure_Workforce_Version_2.0_1.pdf.

⁴⁷ Workplace Stress, OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (last visited Jul. 26, 2024), <https://www.osha.gov/workplace-stress>.

⁴⁸ See Injuries, Illnesses, and Fatalities, U.S. BUREAU OF LABOR STATISTICS (last visited Jul. 26, 2024) (reporting 5,486 fatal work-related injuries in 2022), <https://www.bls.gov/iif/home.htm#:~:text=There%20were%205%2C486%20fatal%20work,per%20100%2C000%20FTE%20in%202021.>

⁴⁹ Hannah Free, *et al.*, *Reported Exposures Among In-Person Workers With Severe Acute Respiratory Syndrome Coronavirus 2 (SARS-CoV-2) Infection in 6 States, September 2020–June 2021*, 75 CLINICAL INFECTIOUS DISEASES S216, Table 2 (Jun. 19, 2022), available at https://academic.oup.com/cid/article/75/Supplement_2/S216/6611490.

⁵⁰ *Id.*

rates of 20-70% of their Public Safety Telecommunicators.⁵¹ As the latter report noted, Public Safety Telecommunicators did not have the option to work remotely and found it difficult to socially distance themselves from fellow employees.

B. Workforce Development Needs

Research and initiatives related to workforce development needs will be more useful if Public Safety Telecommunicators are classified as Protective Service Occupations. For example, the Department of Labor's Employment and Training Administration sought to help increase and expedite attainment of state occupational licenses by veterans and transitioning servicemembers.⁵² This program focused on certain occupational areas, including Protective Service Occupations, likely to align with skills developed during military training and education. Because Public Safety Telecommunicators are not classified as Protective Service Occupations, this program could not help veterans become Public Safety Telecommunicators, which is a significant missed opportunity. The skills and public service values possessed by veterans make them well-suited for a career as a Public Safety Telecommunicator, to such an extent that in 2021 APCO created a Military Employment Taskforce to evaluate options for facilitating this match of veterans' skills to ECCs' employment opportunities.⁵³ Supporting veteran employment and the workforce of Public Safety Telecommunicators remains critical.

C. Job Satisfaction and Retention

Classifying Public Safety Telecommunicators as Protective Service Occupations will support research into turnover rates and job satisfaction. The primary motivation for Public Safety Telecommunicators, like other public safety occupations, is the opportunity to serve their communities by saving lives, helping people get through their worst moments. As with other public safety occupations, the primary stressors of the job and sources of turnover are the trauma of dealing with emergencies and work-life balance challenges related to shift work and mandatory overtime. This is not the case for other Office and Administrative Support Occupations. Thus, classifying Public Safety Telecommunicators as Protective Service Occupations will support research into job satisfaction and turnover and, importantly, assist with the development of empirically-driven policies to support these occupations.

VI. The Benefits of Modernizing the SOC Outweigh Justifications for Perpetuating the Status Quo

The benefits of ensuring the SOC reflects the modern workforce, aligns with other federal data programs, and supports research vastly outweigh whatever value there is in maintaining the

⁵¹ IN911 Statewide 911 Board, *COVID-19 Impact on Indiana PSAPs July-December 2020* (2020), available at https://www.in911.net/uploads/1/2/4/9/124957688/covid_19_impact_on_indiana_psaps_july_-_december_2020.pdf.

⁵² U.S. Department of Labor Employment and Training Administration, *Notice of Availability of Funds and Funding Opportunity Announcement for: Veterans Accelerated Learning for Licensed Occupations Project*, available at <https://www.dol.gov/sites/dolgov/files/ETA/grants/pdfs/FOA-ETA-18-07.pdf>.

⁵³ This effort culminated in a guidebook for ECCs to engage with veteran and military spouse communities. See APCO International, Military Employment Committee, *MILITARY EMPLOYMENT GUIDEBOOK FOR ECCS* (May 2024), [apco-military-employment-guidebook-for-eccs \(apcointl.org\)](https://www.apco.org/military-employment-guidebook-for-eccs).

classification of Public Safety Telecommunicators as Office and Administrative Support Occupations.

A. Moving Occupations to a Different Major Group is Not Uncommon

As part of the previous SOC revision, seven detailed occupations were moved from one major group to another.⁵⁴ We're unaware of any evidence that these changes were detrimental to the effectiveness of the SOC or federal data programs. Furthermore, researchers can easily compare time series data by examining detailed occupation data rather than major groups, or the data for Public Safety Telecommunicators could be subtracted from / added to the appropriate major group with minimal inconvenience to the analysis.

B. Separating Public Safety Telecommunicators from Other Dispatchers in the Office and Administrative Support Occupations Would Not be Confusing

During the prior SOC revision, the SOC Policy Committee argued against reclassifying Public Safety Telecommunicators on the basis that separating them from other dispatchers would be confusing.⁵⁵ This argument would be more persuasive if dispatchers were all listed in one major group, but the SOC already splits different types of dispatchers into several different major groups. Those who perform dispatching to coordinate airfield maintenance personnel are classified as Transportation and Material Moving Occupations.⁵⁶ Those who perform dispatching for power plant operations are classified as Production Occupations.⁵⁷ It would therefore not be confusing or unusual for Public Safety Telecommunicators to be classified separately from administrative dispatchers (labeled "Dispatchers, Except Police, Fire, and Ambulance") that do not perform protective work.

The protective 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. In contrast, Public Safety Telecommunicators employ their experience and training to protect people enduring great distress, harm, fear, or injury.

VII. Conclusion

APCO recommends classifying Public Safety Telecommunicators as Protective Service Occupations by creating a new broad occupation – 33-9040 – within the minor group for "Other Protective Service Workers" that are not law enforcement or firefighting occupations. Moving Public Safety Telecommunicators to the Protective Service Occupations major group would correct an outdated representation in the SOC, recognize the significant changes to this

⁵⁴ U.S. Bureau of Labor Statistics on Behalf of the Office of Management and Budget (OMB) and the Standard Occupational Classification Policy Committee (SOCPC), *What's New in the 2018 SOC*, at Table 1 (showing detailed occupations that moved from one major group to another), available at https://www.bls.gov/soc/2018/soc_2018_whats_new.pdf.

⁵⁵ See SOCPC Responses and Rationales, at 18 (Jul. 22, 2016), available at https://www.bls.gov/soc/2018/soc_2018_docket_responses.pdf.

⁵⁶ See SOC Manual at 203.

⁵⁷ See *id.* at 194.

profession and its lifesaving work, and better align the SOC with the other programs. APCO urges the SOC Policy Committee and OMB to effect this common sense change.