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Acting Commissioner William Wiatrowski
Bureau of Labor Statistics
United States Department of Labor
2 Massachusetts Ave NE
Washington, DC 20212

Dear Commissioner:

We write to urge the Bureau of Labor Statistics to develop a standard occupational classification (SOC) designating Direct Support Professionals (DSPs) as a discrete class of workers – **in addition to home health aides and personal care aides; it could be classified as health care support occupation (31-1123)**. This action will not create any additional costs but will bring many benefits to an entire sector of disability services. Notably, it will allow states and employers to more accurately understand workforce trends in this sector, which will influence public and private decision-making and job creation.

Providers of home and community-based services (HCBS) employ DSPs for the important role of providing community supports to children and adults with intellectual and developmental disabilities (IDD). DSPs are the backbone of these supports, with complex duties that are not adequately captured by existing standard occupational classifications. Providers are concerned that the current classification system is affecting state and federal agencies' policy decisions, such as rate-setting, leading to negative longstanding effects in the retention and recruitment for this workforce.

This is deeply concerning because the single biggest issue facing the agencies that employ these workers is the inability to recruit and retain DSPs in the face of sky-rocketing demand. Nationwide, the turnover rate is approximately 45%, and many agencies experience persistently high vacancy rates. This means that people with IDD are not receiving the stable services they deserve, nor achieving their highest level of independence. Many states report long waiting lists for DSP services. Although DSPs are among the class of workers with the fastest growing need nationwide, little is known about the current labor market because BLS does not presently consider them a discrete class of workers. Without accurate data, appropriately addressing the DSP shortage and high turnover rates is impossible. While turnover is a multi-faceted problem, action from the Bureau of Labor Statistics will be an important step to solving this challenge.

As the principal federal agency responsible for measuring labor market activity, working conditions, and price changes in the economy, the Bureau of Labor Statistics is essential in collecting and analyzing the economic information essential to support public and private decision-making. Currently, the BLS has SOCs for home health aides and personal care aides, which have some overlap with DSPs, but these classifications do not adequately capture this vital occupation. For example, these classifications do not accurately describe the work that DSPs do to keep people with IDD independent, in their homes, and out of institutional care. The primary goal of a DSP is to ensure that a person with IDD is able to live a self-directed life in a safe environment, and that they are able to successfully navigate their community. For example, in a supported employment site such as a janitorial or cafeteria setting, the job coach will walk the individual through the associated

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job responsibilities for the first few months to assist in the learning process, and will discontinue when the individualized plan is complete. While other SOC's may appear similar in some tasks, the DSP role is distinguished by the overriding emphasis in all occupational activities on [increasing/promoting/facilitating/other] the person's independence throughout the life span.

By designating the DSP as its own SOC, the BLS will be in a position to capture much more precise and accurate data specific to the profession. For that reason, we offer this proposed definition for consideration:

Enhance independence and community inclusion for children and adults with intellectual and developmental disabilities (IDD). Work involves coaching and supporting individuals with IDD to communicate their needs, achieve self-expression, pursue personal goals, and participate actively in employment or voluntary roles in the community. May provide assistance with activities of daily living (e.g., feeding, bathing, toileting, or ambulation) and with tasks such as meal preparation, shopping, light housekeeping, and laundry. May provide support to a person with a disability at home, work, school, church, and other community places. Excludes "Home Health Aides" (SOC 31-1121), "Personal Care Aides" (SOC 31-1122), and "Psychiatric Aides" (SOC 31-1133).

Illustrative examples: Autism and Behavioral Support Professional

Thank you for your time and attention to this matter, which will allow for the collection of meaningful, relevant data on this essential sector of the workforce.

Sincerely,

cc: Alexander Acosta, Secretary, Department of Labor

Nancy A. Potok, U.S. Chief Statistician, Standard Occupational Classification Policy Committee