

August 12, 2024

**RE: Docket ID (BLS-2024-0001) “Standard Occupation Classification (SOC) – Updates for 2028”**

To Whom It May Concern:

I am the Intellectual and Developmental Disabilities Division Director at the Rehabilitation and Community Providers Association (RCPA). I am writing in order to convey our support of the addition of a Standard Occupational Code (SOC) for direct support professionals (DSPs) in the IDD field. Without such a code, the unique work that DSPs do is not captured, and the historically low wages that DSPs make will remain the norm. An SOC will allow for good data around wages and allow for the professionalization of the DSP workforce.

Our mission at RCPA is to represent providers of health and human services committed to effective, efficient, and high-quality care. We provide state and federal advocacy around key policy issues concerning intellectual and developmental disabilities, as well as brain injury, mental health, children’s services, criminal justice, pediatric rehabilitation, medical rehabilitation, physical disabilities and aging, and substance use disorders.

On behalf of Direct Support Professionals (DSP) who support people with intellectual and developmental disabilities (I/DD), we urge you to create an SOC code for these positions. The work DSPs do to support people with disabilities to live the lives they want, in their communities and at home, is invaluable.

The current wages for these workers aren’t enough to support themselves or their families! Part of that reason is because they don’t have their own SOC. The tasks that DSPs perform are different from those done by, for example, home health attendants or personal care workers, and their work would be more effectively measured with their own SOC code.

Having their own code can:

- Provide better policies by collecting accurate data that can help address the challenges DSPs face.
- Promote better understanding about DSP trends, which can help solve the shortage of workers in services for people with I/DD.
- Increase Professional Recognition: Clear data can help ensure DSPs receive the recognition and support they need to continue providing high-quality care.

DSPs need their own unique code; we have been advocating for this for many years. Please consider our request to promote professionalism of these positions.

Thank you for the opportunity to provide comments.

Sincerely,



Carol J Ferenz  
Director, IDD Division, RCPA