Submitting Reclassification Comments to OMB: Do’s & Don’ts

Background
The Office of Management and Budget (OMB) has begun its process of updating the federal Standard Occupational Classification (SOC) system, which categorizes 9-1-1 telecommunicators as an “Office and Administrative Support Occupation.” As part of this process, OMB seeks public comment through August 12, 2024, on any updates that should be made to the classification system and the SOC manual, set to be released in 2028.

On behalf of our members, NENA will be filing comments recommending the reclassification of 9-1-1 telecommunicators into the “Protective Service Occupation” category. While it is not essential that you submit your own comments, NENA offers the following guidance to anyone wishing to do so; this will ensure your submission is effective and provides the specific, objective, and research-based information that OMB looks for when considering a reclassification request.

A Different Kind of Advocacy
Unlike a legislative appeal to an elected official, who can often be swayed by public opinion, emotion, or a groundswell of support, OMB and its SOC-coordination partner, the Bureau of Labor Statistics, are research-based agencies. As such, emotional or testimony-based appeals for reclassification will be ineffective and unpersuasive. Instead, it is important to ensure that your comments to OMB are data-driven and answer the specific questions being asked. OMB outlines these questions here, in the “Desired Focus of Comments” section.

Commenting Do’s
If you are interested in submitting a comment, then please do include the following information:

- **Proposed occupation title:** In this case, “Public Safety Telecommunicator”
- **Description of the nature of work performed:** OMB is asking what kind of work 9-1-1 telecommunicators do and how it is done. Specifically mention the various process and procedures performed as part of the work. For example, describe how telecommunicators intake information from a caller, what triage questions are asked, and how telecommunicators initiate an emergency response and convey relevant information to field responders.
- **Describe the relationship to other SOC occupations:** OMB is trying to determine which category “Public Safety Telecommunicators” should be in. Therefore, it is important to specify
9-1-1’s close working relationship with other public safety personnel and disciplines, such as law enforcement, fire, and emergency medical services.

- **Tools & technologies:** Specify what type of technologies are used in a 9-1-1 center (such as mapping software, CAD systems, incident imagery tools, etc.) and, specifically, how telecommunicators use them.

- **Education & training:** Describe how your telecommunicators are trained and what they are trained in (ex. emergency medical dispatch), and consider giving examples of specific high-acuity call types. Describe any mandatory or desired certifications or credentials that your telecommunicators may hold.

**Commenting Don’ts**

For OMB to consider the substance of your comment, **do not include**:

- **Emotional appeals:** OMB does want anything other than empirical and objective data. As such, passionate and emotional pleas are not useful; they may even end up harming our cause. While providing some examples for color and clarity in support of the facts can help illustrate the nature of telecommunicators’ work, comments that rely exclusively or heavily on storytelling will likely be disregarded.

- **Aggressive or negative language:** When you submit a comment, it becomes part of the public record. Remember that you are representing your industry and your colleagues, so make sure the tone of your writing is measured and respectful.

**Submitting Your Comments**

Comments can be submitted electronically by going to the [Federal Register webpage for this proceeding](https://www.federalregister.gov/) and clicking “Comment.”

**Help Ensure Reclassification by Updating Your Job Descriptions**

While submitting a data-driven comment with OMB may help our cause, **the single-most-effective thing you can do to make sure reclassification happens is to update your center’s job descriptions.**

Following the comment period, OMB will conduct research on labor classifications and will examine job descriptions and vacancy announcements to help guide their decision making. Therefore, it is critical that your job descriptions and vacancy announcements match the work performed in your PSAP. This will ensure that if your PSAP is audited during the SOC manual update process, OMB will see that the work done is indeed public safety, not clerical. The National 911 Program Office has a [step-by-step reclassification toolkit](https://www.nena.org/) that guides you through the process and contains sample job descriptions.