
VOR Comments to the Office of Management and Budget: Standard Occupation Classification (SOC) – Updates for 2028 (Docket ID BLS-2024-0001)

VOR – A Voice Of Reason - is a national non-profit organization founded in 1983 by families of people with intellectual and developmental disabilities. VOR primarily represents individuals with the most severe degrees of I/DD and autism, and their families and guardians.

Many of the individuals VOR advocates on behalf of become physically full grown, age-wise, yet typically function at an intellectual level ranging from a few months to two or three years. The majority have significant physical and/or psychiatric/behavioral issues, and they need assistance in feeding, bathing, toileting, diapering, dressing. They depend on staff to lift them, attend to seizures, and prevent them from harming themselves or others. Their numerous medical needs typically necessitate care 24 hours a day, 7 days a week.

Our community requires trained Direct Support Professionals (DSPs) for both safety and medical needs.

While the nation is in the midst of a shortage of qualified health care workers, the disability community faces a crisis. A gap in care means a gap in medical needs being met, increased hospitalizations, and poorer quality of health overall. Many of these individuals do not have the option to live independently or be left alone for any length of time, so DSPs are absolutely a requirement – not a benefit.

VOR requests that a standard occupational classification (SOC) code for DSPs be established to best ensure recognition of those who work by providing services for our community. As noted above, the care needs for these individuals are nuanced, pervasive and complex. It takes additional training to learn best practices, and the work is no doubt exhausting -- physically and mentally – for these DSPs.

In addition to recognizing the specific skill set and realities of the work, a new code would allow for improved data collection and research on best practices for this population, all of which are relevant next steps for DSPs to more easily receive training and pay commensurate with the job, and clarify a path from job to career within this occupation. Establishing a SOC for DSPs will positively impact beneficiaries, their families, and the DSP workforce.

DSPs work in a variety of settings. While many work through the Home- and Community-Based Services (HCBS) programs funded under the Medicare and Medicaid systems, there are many who do not. We ask that the Office of Management and Budget consider the full range of DSPs, including those who provide care in state- and privately-operated intermediate care facilities, at-home care, behavioral care, and specialized therapy programs. The DSP SOC code should be based on the employee's work – not the location of the work.

VOR appreciates the Office of Management and Budget prioritizing DSPs as part of the SOC update. As you continue your work on the classifications, please do not hesitate to reach out with any questions you may have.