

March 16, 2001

Mr. Doug McPherson
Division of Standards National Industry Promotion
USDOL-OATELS
Room N-4649
200 Constitution Ave., N.W.
Washington, D.C. 20210

Dear Mr. McPherson:

Thank you for giving me the opportunity to comment upon the apprenticeability of the **Direct Support Professional** occupation. I am responding on behalf of the **National Alliance for Direct Support Professionals (NADSP)**. The NADSP is a national coalition representing key stakeholders across the nation concerned with strengthening this vital and rapidly expanding workforce. At the outset I want to express that our coalition is very much in favor of the concept of apprenticeship as a potentially powerful vehicle to welcome and train new employees in an industry that is in desperate need of qualified workers. We are, however, concerned with the details of the national patterns presented for review in your correspondence. I will comment on this in detail and provide alternative recommendations that coalition members agreed upon in our last national meeting on February 24th & 25th in Phoenix, AZ. We were grateful, that a US Department of Labor representative was present to assist us in our efforts. First, however, I want to explain the nature of our coalition and industry.

The organizations who are members of this coalition represent a vast number of employers, employees, educators, trainers, policy makers and people who rely on direct support professionals in their daily lives. Collectively a modest estimate of the employee base these organizations represent is approximately 3 million social/human service direct support employees working in every community throughout the complete range of human service industry sub-sectors found throughout the country.

This coalition has been carefully assembled to represent important differentiating characteristics of employer groups (public and private employers, small and large businesses); and to include the voices of other key stakeholders including consumers, families, employees, and educators. Partners have joined on the basis of their ability to adequately represent various industry sub-sectors and their demonstrated commitment to systems change in human service workforce development.

Many coalition members have been worked together for over eight years to improve social/human services education and training and have committed substantial funding and in-kind support to this effort. Our coalition includes the following organizations:

- Administration on Developmental Disabilities
- American Association on Mental Retardation
- American Association of Public Developmental Disabilities Administrators

- Association for Persons in Supported Employment
- CARF: The Rehabilitation Accreditation Commission
- Consortium for Citizens with Disabilities
- City University of New York: Consortium for the Study of Disabilities
- Council for Standards in Human Services Education
- Human Services Research Institute
- Institute on Community Integration (UAP) University of Minnesota
- Irwin Siegel Agency, Inc.
- National Association of State Directors on Developmental Disabilities
- National Center for Educational Restructuring and Inclusion
- National Center for Paraprofessionals in Education
- National Organization of Child Care Workers Association
- National Organization for Human Services Educators
- New Jersey Association of Community Providers
- President's Committee on Mental Retardation
- Program in Child Development and Child Care, University of Pittsburgh School of Social Work
- Reaching Up, In.
- Self-Advocates Becoming Empowered
- TASH
- United Cerebral Palsy of America

Industry Description

The social services industry is a vast and rapidly expanding sector of the American economy. Federal and state expenditures under public social service programs accounted for 21.1% of the Gross Domestic Product in 1993 (Statistical Abstracts of the United States, 1996). Based upon 1996 National Occupational and Employment Data generated by the Bureau of Labor Statistics, the social services/ human services sector employs approximately 2,817,805 people in the following unduplicated occupational areas: social work, residential counselor, human service worker, recreational work, psychiatric assistance, personal and home care assistance (excluding home health aides), child care, and teacher's aide.

Table1
Major Occupations in Social/ Human Services with Direct Service Characteristics
excluding Executive and Managerial Positions, Allied Health Professions and Criminal
Justice Professions

Occupational Code	Industry Title	1996 Employment Level
27108	Psychologists	92,630
27302	Social Workers, medical and psychiatric	246,100

27305	Social Workers except medical and psychiatric	351,760
27307	Residential Counselors	196,535
27308	Human Services Workers	240,220
27311	Recreational Workers	289,280
32931	Psychiatric Technicians	77,650
66014	Psychiatric Aides	101,280
68035	Personal and Home Care Aides	208,200
68033	Child Care Workers	377,980
31521	Teacher's Aide, Paraprofessional	636,170
	Total:	2,817,805

It is difficult to ascertain from current employment databases the number of executive and administrative roles in this sector, therefore these are not estimated in this table. It is, however, fair to say that this number is significant because the landscape of this sector is largely dominated by small to mid-size, private corporations located in virtually every community throughout the United States.

Each of these numerous community-based organizations typically has its own executive, programmatic, managerial and business functions offering a wealth of employment opportunities. This can be observed in the results of a national survey where a total of 1050 community based youth work agencies report employing 16,000 full time staff and 14,000 part-time employees. Of the full-time employees, 15% served in executive roles, 4% were in financial service roles, 8% in membership and marketing, 6% in fund development and 17% in program supervisor roles. (The National Collaboration for Youth, 1996). This break-out is typical of the structure of organizations across other industry sub-sectors.

In light of this vast array of employment and advancement opportunities, it is important to note that a majority of the mid-level program managers, senior executives, clinicians, therapists and case managers began their careers in entry-level direct service roles, often pursuing their education at the same time. The entry level direct service roles in human services typically do not require credentials or degrees beyond a high school diploma or a G.E.D., but they are interesting, complex and demanding jobs. The wealth of first-hand experience acquired in the direct service role, when coupled with the pursuit of appropriate knowledge sets and ethical principles, offers an important springboard into a vast array of roles and career opportunities.

The numerous separate businesses providing human services have formed umbrella trade associations and related groups (organized by industry sub-sector see below) at the state and national levels to share information and to represent their interests. Many of the key national and regional associations are members of the NADSP. Also, with the recent introduction of managed care principles to human service delivery systems there has been a growing trend toward larger corporations that provide services in multiple states and communities. Representatives of these larger organizations are also included in our member organizations.

Occupational growth projections for the industry are enormous, posing unique problems for an industry that is currently suffering from severe labor shortages (Larson, 1997; Jaskulski and Metzler, 1990; Silver and Taylor, 1997). The Bureau of Labor Statistics estimates that by the year 2008, over $\frac{3}{4}$ of all new jobs will be added in the retail and service sectors with 10 million jobs needed in the service sector. Based on estimates that social and human services make up 6% of the service sector, we will need 600,000 new jobs in addition to those we are already desperately struggling to fill.

The social services landscape is composed of a series of separate industry clusters whose boundaries are based upon either the unique characteristics of the populations of clients (sometimes referred to as consumers or service participants) served or the type of service rendered. Service delivery areas representing the major sub-industry clusters include the following:

- Child Care Services
- Child Welfare Services
- Developmental Disability Services
- Physical Disability Services
- Employment Services
- Housing Services and service to homeless
- Family Support Services
- Home services for people needing long-term support
 - (frail seniors, chronically ill, people with disabilities)
- Mental Health / Behavioral Health Services
- Special Education Services
- Substance Abuse Services
- Youth Development Services

In some cases criminal justice services are included in the social services industry clusters but this sector is excluded here primarily because the custodial/criminal nature of these services make services and occupational roles qualitatively different than the other sectors. Additionally, the **Community Support Skill Standards** (Taylor, Bradley, & Warren, 1996) are used as an important integrating structure in our approaches to education and training and the criminal justice occupations were not included in the development of these standards.

Given the complexity of the skills and knowledge used regularly in human service roles as well as the critical nature of good interpersonal skills, educational preparation in the field has a rich and extensive tradition of experiential education. New recruits and tenured direct support professionals receive the bulk of their training on the job and in OJT classrooms. Students pursuing post-secondary degrees in the human and social services spend substantial periods training in field-work environments. For these reasons apprenticeship is a natural pathway through which incumbent workers and learners could conceivably obtain the explicit and tacit, knowledge, skills and ethical principles so important to our work.

In reviewing the minimum standards for work experience (2000 hours) and related instruction (144 hours), it is our opinion that these are feasible minimum benchmarks to achieve a competent level of initial mastery of the direct support practice. In planning a comprehensive apprenticeship program, we feel that it is appropriate to create two mastery awards: 1) Initial Mastery; and 2) Advanced Mastery. These certifications **must not become a mandatory requirement** for working as a direct support professional – such a move would be disastrous to our industry. In thinking through the other elements that we would expect to see in an adequate, national framework for apprenticeship, the NADSP has come to a consensus on the following features:

NADSP Proposed Patterns & Requirements of a National Apprenticeship/Credential program for DSPs

1. Candidates must meet any state and local training requirements in addition to apprenticeship requirements - wherever possible these should be integrated into the On the Job Training Competencies.
2. Occupational/ award level titles should reflect appropriate professional role titles such as direct support trainee vs. apprentice. Our industry has a proud tradition of post-secondary education and we wish to accommodate the language and norms of this tradition as much as possible
3. Ongoing quality assurance of approved apprenticeship preparation programs should be the primary responsibility of state/regional or local industry stakeholder groups (self-regulating);
4. Wage scales for certified DSPs should locally indexed but certificate level worker should not receive less than 130% of the poverty level.
5. The national framework must accommodate individualized, consumer-directed work arrangements in that requirements should not reference organization based training exclusively, and should permit field based learning requirements to be fulfilled under the guidance of a skills mentor by DSPs / service brokers working for an individual consumer or self-employed direct support professionals/ service brokers. (The currently proposed framework does not have this flexibility and this is a major flaw given the emerging trends in our industry).
6. Skill mentoring must occur for candidates during the fulfillment of their work-based learning requirements;
7. There must be a periodic review and renewal of the national apprenticeship requirements to ensure consistency with industry best practices and trends;
8. Learning methods and materials whether self-directed or classroom- based must be culturally relevant and adaptable for individuals with special needs;

9. Preparation programs must include assessments and these must:
 - a. be aligned with the identified skill, knowledge and ethical sets;
 - b. follow appropriate national standards for fairness; and,
 - c. be valid, reliable and of sufficient challenge;

10. Preparation programs incorporate two or more awards - initial mastery and advanced mastery. Other specialized certificates may be developed and awarded as needed.. For award titles we recommend Certificate of Initial Mastery in Direct Support and Certificate of Advanced Mastery in Direct Support;

11. Local preparation bodies must be guided/monitored by a panel of stakeholders who include consumer representatives, family representatives (1/3), direct support professionals (1/3), employers, educators, trainers and policy makers (1/3);

12. The Community Support Skill Standards (CSSS) and the Minnesota Frontline Supervisory Skill Standards represent the body of skill and knowledge to be mastered.

13. Candidates must sign a statement that they accept and understand the Direct Support Professionals Code of Ethics or another relevant ethical code.

14. Candidates must submit testimony, verbal (via audio or video tape) or written from consumers/families indicating that they endorse their candidacy.

15. Preparation programs must include alternative competency achievement assessment processes to provide candidates with an opportunity to obtain a “passport” for past mentored work experience and related instruction on required elements.

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