Ms. Kate Haller

Subject: 5123:2-2-01-Provider Certification Rule-Removal of provision requiring a high school diploma or general education development certificate for an individual engaged in a direct service position.

Dear Ms. Haller:

The Ohio Provider Resource Association (OPRA) and The ARC of Ohio request removal of the provision in O.A.C. 5123:2-2-01 that requires an individual engaged in direct service to have a high school diploma of GED. Our collective role as a developmental disabilities system is to ensure the hiring, training, nurturing and support of the best frontline caregivers possible.

Arguably the instincts best suited to supporting individuals are not necessarily borne out of structured, systemic education. Compassion, commitment and an intellectual curiosity and interest in another’s well-being are likely innate and not taught or even honed in school.

We suspect there is a pool of potential quality caregivers across our state that due to life’s circumstances do not have a high school degree or equivalent and are prevented from working as DSPs and front line supervisors. Yet they may prove exceptional caregivers and be a positive addition to the lives of individuals we serve.

Please be advised that we are not recommending any changes to this same requirement in the rules governing the administration of medication. One would still need a high school degree or equivalent and the proper training to administer medications. As a practical matter therefor our request is recognized as self –limiting in scope.

On a secondary but supportive note we cannot ignore the encroaching inevitability of a demographic workforce shortage. The federal Department of Labor predicts direct care as the number one job in demand nationally over the next twenty years. The population projections during that same timeframe reinforce this as a coming crisis as there simply won’t be enough people to perform the needed work. We must be sensitive to this dilemma in all of our policymaking and our request is consistent with this and the realities on the ground.

We hope the Department will consider our request and we would be glad to respond to any further questions. Thank you.

Mark Davis Gary Tonks