



AMSI MBC1 – Measurement, Billing, and Classification for Transparent Support Services: A Standardized Linking Guide

Introduction

Accurate measurement and transparent reporting are essential to the long-term stability, quality, and equity of support services for individuals with intellectual and developmental disabilities (IDD). Without a clear, standardized connection between the work performed by staff, the occupational roles they fulfill, and the government funding provided to sustain these services, organizations, policymakers, and funding agencies face significant challenges in making fair, informed decisions.

Today, the systems used to report staffing structures, billing claims, and service costs vary widely between providers. Internal job titles are often inconsistent, occupational roles are not aligned with recognized classification systems, and reimbursement requests frequently lack a direct, verifiable link to the actual services delivered. As a result, opportunities for fair wage distribution, strategic workforce development, and responsible fiscal planning are compromised.

This guide proposes a practical framework to address these gaps by establishing a clear internal link between:

- Providers' internal job title coding systems,
- The Standard Occupational Classification (SOC) system used nationally to define occupations, and
- Government funding mechanisms, including Medicaid billing codes, state reimbursement codes, and other applicable public funding sources.

By adopting this structure, providers, funding agencies, and policymakers will be better equipped to:

- Measure services accurately,
- Distribute resources equitably, and
- Make sustainable, data-driven decisions that prioritize the quality of supports and the well-being of the workforce delivering them.

Although Medicaid is used throughout this guide as a primary example, the proposed model is intended to apply across multiple funding streams, including state, local, and federal programs that support individuals with IDD.

Applying the principle of "**measure twice, cut once**," this approach builds a stronger foundation for transparency, equity, and accountability — strengthening the systems that individuals with disabilities, service providers, and the broader community rely upon.

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1. Current Gaps in Funding and Reporting Systems

Despite significant efforts by service providers and funding agencies to support individuals with intellectual and developmental disabilities (IDD), major gaps remain in how staffing structures, occupational roles, and reimbursement processes are connected and reported. These gaps create barriers to equitable resource distribution, workforce development, and long-term service sustainability.

Key issues include:

1.1. Disconnect Between Internal Job Titles, Roles, and Funding

Providers often create internal job titles for staff that do not clearly correspond to nationally recognized occupational standards.

- Job descriptions may vary significantly across organizations, even for similar roles.
- Staff performing critical direct support functions may be classified inconsistently, complicating service reporting and reimbursement tracking.
- Funding requests tied to services delivered by these roles may lack standardized occupational linkage, making system-wide funding analysis difficult.

Without a consistent structure connecting job roles to recognized occupational standards, it becomes challenging to advocate for adequate funding or demonstrate true service needs across providers.

1.2. Blending of Occupational Roles Under Broad Job Titles

In current practice, multiple distinct occupational roles are often grouped together under broad internal job titles such as "Direct Support Professional" or "Employment Specialist."

- For example, a single "DSP" title may encompass personal care assistance, community integration facilitation, transportation coordination, and employment coaching — each of which corresponds to different occupational classifications under the SOC system.
- This blending of roles complicates accurate reporting, cost tracking, wage alignment, and funding requests, as different tasks involve different levels of responsibility, skill sets, and service billing structures.

Without standardized separation and classification of blended duties, important distinctions between occupational roles are lost, weakening transparency and making it difficult to determine actual workforce needs and costs.

1.3. Lack of Standardized Occupational Classification Usage

The Standard Occupational Classification (SOC) system, a nationally recognized framework for categorizing work performed across industries, is rarely used consistently in the IDD services sector.

- Many providers are unaware of how SOC codes could enhance clarity and accountability in staffing and billing.
- Without SOC alignment, occupational roles supporting individuals with IDD are often under-recognized in government data systems and funding analyses.

This gap contributes to the continued invisibility of direct support work in broader policy and funding decisions.

1.4. Inconsistent Integration with Government Funding Codes

Internal provider job coding systems are often not directly connected to Medicaid billing codes, state reimbursement codes, or other public funding codes.

- Billing for services may accurately reflect hours and units but not clearly trace back to the occupational role or staffing cost associated with service delivery.

- Administrative roles and direct support roles may be blended in reporting, obscuring the true costs of frontline workforce delivery compared to overhead or indirect costs.

Without clear integration of job role classification and billing structures, funding accountability and workforce advocacy are significantly weakened.

1.5. Challenges Across Different Funding Streams

While Medicaid remains a dominant funding source for IDD services, other funding streams — including state contracts, local grants, and federal support programs — are subject to similar data gaps:

- Lack of consistent internal coding makes it difficult for providers to adapt documentation across different funders.
- Policymakers have limited visibility into how workforce resources are allocated across diverse programs.
- Opportunities to coordinate funding streams and optimize service quality are missed due to fragmented and inconsistent reporting systems.

Unified coding and reporting structures would benefit all programs, regardless of funding source, by improving clarity, planning, and fiscal responsibility.

2. The Role of the Standard Occupational Classification (SOC) System and Addressing Occupational Blending

Accurate service delivery measurement and funding accountability require a standardized way to define the work performed across support services. The Standard Occupational Classification (SOC) system, maintained by the U.S. Office of Management and Budget (OMB), provides a comprehensive, structured framework for classifying occupational roles based on the actual tasks performed, not simply on internal job titles.

Although the SOC system was originally developed for workforce statistical purposes, it has increasingly become a foundational tool for:

- Structuring labor market data,
- Informing government funding programs,
- Guiding workforce development initiatives across industries, including human services.

Aligning internal job titles with SOC codes provides an opportunity to build greater transparency, consistency, and equity in the reporting and funding of services for individuals with intellectual and developmental disabilities (IDD).

2.1. Why SOC Alignment Matters

Using SOC codes to align internal job titles in the IDD services sector offers major benefits:

- **Clarity and Transparency:**
SOC codes define the essential functions of occupations based on work performed, avoiding confusion created by varying internal titles across providers.
- **Consistency Across Providers:**
Standardized classification enables comparability of staffing structures and costs, regardless of how individual organizations internally title their positions.
- **Equity in Wage Distribution:**
Aligning roles to recognized occupational standards supports fairer wage planning based on the complexity and responsibility level of different service tasks.
- **Accurate Connection to Funding Streams:**
Linking staff roles to SOC codes strengthens the connection between services delivered and billing structures used for Medicaid reimbursements, state contracts, and other funding programs.
- **Enhanced Workforce Recognition:**
Clear occupational classification supports professionalization of the direct support workforce by connecting their work to nationally recognized labor categories.

By establishing a strong link between work performed and funding requested, SOC alignment promotes both accountability and workforce development across the field.

2.2. Addressing the Blending of Occupational Roles

As noted in Section 2, broad internal job titles often group together multiple distinct occupational roles.

For example:

- A "Direct Support Professional" (DSP) title may cover tasks such as personal care, skill-building facilitation, transportation support, and employment coaching — each of which corresponds to different occupational classifications under the SOC system.

Using the SOC framework, providers can properly address blended roles by:

- **Identifying the primary work functions** performed by each staff position,
- **Assigning the most appropriate SOC code** based on the actual duties most consistently performed, not just the internal title,
- **Separating time, billing, and staffing records** where roles encompass multiple distinct occupational classifications.

Where blended roles cannot be cleanly separated by position, providers can:

- Assign proportional responsibility using multiple SOC codes internally, or
- Clarify dominant work functions for clearer reporting and billing classification.

Applying this method allows providers to:

- Ensure transparency in role documentation and billing practices,
- Support equitable staffing plans,
- Strengthen funding advocacy by providing verifiable data on the workforce supporting individuals with IDD.

2.3. Note on SOC Guidance for Blended Roles

The SOC system acknowledges that some positions may involve a mixture of duties spanning multiple occupational categories.

According to SOC principles, workers should be classified based on the **primary work performed** — the tasks that occupy the majority of their time and reflect the core nature of their job.

Where roles cannot be clearly assigned to a single category, careful proportional allocation across SOC codes may be used internally to support accurate reporting and funding alignment.

This guide builds upon that foundational approach to propose a structured, practical method for providers to manage blended occupational roles within the IDD services sector.

3. Proposal for Standardized Internal Linking

To address the existing gaps in workforce reporting, occupational classification, and funding alignment across Medicaid and other government programs, this guide proposes a standardized internal linking framework.

The proposed model is based on three core principles:

- **Internal job title coding must be linked to national SOC classifications,**
- **SOC classifications must be linked to Medicaid billing codes and other relevant government reimbursement codes,**
- **Direct support roles and related administrative roles supporting direct service delivery must be clearly separated internally by service providers and identified separately within reports submitted to relevant funding agencies, including Medicaid programs, state disability offices, and other government funders.**

This structure will strengthen funding accountability, promote equitable wage distribution, support better workforce planning, and ensure that services delivered to individuals with intellectual and developmental disabilities (IDD) are accurately reflected across all funding streams.

3.1. Linking Internal Job Title Coding to SOC Classification

Each service provider would create an internal mapping between their existing job titles (internal codes) and the closest applicable Standard Occupational Classification (SOC) code based on the **primary work functions** performed by staff.

Key Actions:

- **Identify Primary Work Functions:**
Analyze actual duties associated with each internal job title, not merely the title name.
- **Assign the Closest SOC Code:**
Match each role to the SOC code that best represents the core work functions performed.
 - If a position blends multiple occupational roles (e.g., a DSP performing employment coaching), the provider should determine:
 - The **primary role** based on the highest level of skill required for tasks performed, or
 - If unclear, based on the tasks most commonly performed.
- **Document the Mapping Internally:**
Maintain internal documentation linking job titles to SOC codes to support funding transparency, reporting accuracy, and internal quality audits.
- **Review Regularly:**
Reassess internal SOC mappings at least annually or when major changes in service delivery models occur.

3.1.1. SOC Principles for Choosing the Correct Classification

According to the U.S. Standard Occupational Classification (SOC) system, when a worker performs a mixture of tasks from multiple occupations, the classification should be based on:

- **The highest level of skill required for the tasks performed,** and if that is not determinative,
- **The tasks most commonly performed** by the worker.

If no single occupation clearly dominates, internal proportional allocation across multiple SOC codes may be used for internal tracking purposes. However, for external reporting, the worker should be classified under the occupation that best fits the overall work performed.

Relevant guidance from AMSI proposals adds:

- Providers should document internally how blended roles were assessed and classified.
- In cases of truly mixed work duties, internal time tracking and role description splitting are encouraged to improve transparency and future service quality planning.
- Clear primary-duty classification strengthens both funding transparency and workforce recognition.

3.1.2. Application of the Threshold Rule

In practice, the assignment of SOC codes depends on the distribution of work tasks. The following examples illustrate two scenarios:

- When **no single SOC code covers at least 80% of duties** → **Splitting billing is required.**
 - When **at least 80% of duties fall under one SOC code** → **Splitting billing is not required.**
-

3.1.2.1. Example 1: No Single SOC Code Dominates (Splitting Billing Required)

Direct Support Worker's Job Title (Internal Code #)	Task Performed	% of Time Spent	Assigned SOC Code (Internal Use)	Notes
Direct Support Worker (Internal Code #)	Personal Care Assistance	40%	39-9021 Personal Care Aides	Tasks involve direct support for daily living activities.
	Community Skill-Building Facilitation	30%	21-1093 Social and Human Service Assistants	Tasks involve supporting community integration and skills.
	Employment Coaching	30%	21-1015 Rehabilitation Counselors	Tasks involve supporting employment goals and job coaching.

Notes:

- **Splitting Billing Required:**
 - No single SOC code covers 80% or more of the duties.
 - Billing must be proportionally allocated across different service categories based on time spent.
- **Internal Tracking Use:**
 - Useful for staffing management, service planning, and compliance.

3.1.2.2. Example 2: Dominant SOC Code Present (No Splitting Billing Required)

Direct Support Worker's Job Title (Internal Code #)	Task Performed	% of Time Spent	Assigned SOC Code (Internal Use)	Notes
Direct Support Worker (Internal Code #)	Employment Coaching	80%	21-1015 Rehabilitation Counselors	Supports job coaching and employment retention services.
	Personal Care Assistance	20%	39-9021 Personal Care Aides	Supports daily living activities.

Notes:

- **No Splitting Billing Required:**
 - 80% of duties align with the SOC code 21-1015 Rehabilitation Counselors.
 - The worker can be classified and billed fully under this SOC code without splitting billing.
- **Internal Tracking Recommended:**
 - Agencies may still document secondary duties internally for staffing and quality management purposes.

3.2. Associating SOC Codes with Medicaid and Other Government Funding Codes

Each job role, once aligned with the appropriate SOC code, must also be associated with relevant billing codes and reimbursement structures used in Medicaid and other public funding systems.

Linking SOC codes to Medicaid and other billing codes ensures that the services performed are accurately reflected in claims and that reimbursement structures fairly account for the complexity and skills required in service delivery.

The following table illustrates how SOC codes can be connected to Medicaid billing codes and other funding codes for reimbursement purposes:

3.2.1. Example Table: Linking SOC Codes to Medicaid and Other Funding Codes

Assigned SOC Code	Medicaid Billing Code Example	Other State/Federal Funding Codes Example	Notes
39-9021 Personal Care Aides	H2016 (Community Habilitation)	OPWDD Residential Habilitation Code	Supports personal assistance for activities of daily living.
21-1093 Social and Human Service Assistants	T2015 (Pre-Vocational Services)	State Day Program Billing Code	Supports community skill-building activities.
21-1015 Rehabilitation Counselors	H2025 (Supported Employment)	ACCES-VR Supported Employment Code	Supports job coaching and employment retention services.

Notes:

- **SOC Codes Represent Service Delivery:**
→ Aligning SOC codes with billing codes clarifies the nature of services rendered.
- **Improved Funding Transparency:**
→ Clear linkage supports fairer reimbursement practices and service planning.
- **Cross-Program Application:**
→ This structure can be applied not only in Medicaid but also in various federal, state, and local funding programs.

3.2.2. Note on Existing Models and Systemic Challenges

Splitting billing based on distinct service activities is not a new or untested concept. Programs such as **Self-Direction** under OPWDD already require staff to record and bill time separately according to the type of support provided (e.g., community habilitation, supported employment, respite).

Applying similar billing transparency in other service areas builds on proven practices already familiar to many providers.

It is recognized that implementing this model more broadly may initially meet challenges, particularly in environments where staffing shortages place pressure on agencies to flexibly reassign duties.

Without structured role separation and time tracking, agencies risk inadvertently overbilling for services or misrepresenting service types — exposing themselves to audit findings and reputational harm.

Adopting standardized linking between internal job roles, SOC classifications, and funding codes — along with clear internal time tracking — provides a sustainable way to:

- Protect agencies from compliance risks,
- Strengthen workforce development planning,
- And ensure that individuals with intellectual and developmental disabilities (IDD) receive the full benefit of specialized, skill-appropriate services.

3.2.3. Optional Simplified Threshold for Mixed Duties

To simplify implementation, agencies may apply a threshold model when assigning SOC classifications and billing structures:

- If **at least 80%** of an employee’s duties align with one SOC classification, the employee may be classified under that SOC code for both internal and external reporting and billing purposes.
- Agencies may adjust this threshold between **75% and 85%** based on program-specific needs, provided that the internal threshold is:
 - **Consistently applied** across service roles, and
 - **Documented in internal workforce policies.**
- If no single SOC classification represents the required threshold, **splitting billing based on actual time spent** must be used.

Applying a flexible threshold model balances administrative simplicity with funding transparency, ensuring that both providers and funders have a realistic, adaptable framework for classifying and reimbursing diverse service roles.

3.3. Clear Separation of Direct Support and Administrative Roles

To protect transparency and equity, providers must clearly distinguish between staff performing **direct service functions** and those performing **administrative or support functions related to direct service delivery**.

Key Actions:

- **Identify Direct Service Roles:**
Staff whose primary responsibilities involve direct interaction with individuals with IDD, supporting activities of daily living, skill development, employment assistance, or community integration should be classified as direct support.
- **Identify Related Administrative Roles:**
Staff whose primary responsibilities involve oversight, supervision, billing, coordination, or data management in support of direct service delivery should be classified separately as administrative support for direct services.
- **Use Separate SOC Codes and Billing Structures:**
Administrative roles should not be blended into direct support reimbursement claims.
→ If administrative costs are billed separately (e.g., under general administration allowances), they should be tracked distinctly.
- **Promote Fair Wage Distribution:**
Clear separation helps ensure that direct support funding flows to frontline workers wherever possible, rather than being absorbed into indirect organizational costs.
- **Enhance Workforce Advocacy:**
Documented separation allows clearer advocacy for DSP wage increases, better aligning compensation with the actual value and complexity of direct service work.

5. Application Across Different Funding Streams

The proposed framework for standardized internal linking — connecting internal job titles to SOC classifications and then to government funding codes — is designed to be adaptable across the various funding streams that support services for individuals with intellectual and developmental disabilities (IDD).

This section outlines how the framework can be applied in Medicaid-funded services, state and local contracts, and federal support programs.

5.1. Medicaid-Funded Services

Medicaid is the primary funding source for many employment, residential, day habilitation, and community-based services provided to individuals with IDD.

Application Principles:

- **SOC-based Role Classification:**
Each direct support worker’s primary role must be classified according to SOC standards, using the 80% (or flexible 75–85%) threshold where applicable.
- **Linking to Medicaid Billing Codes:**
Assigned SOC codes must be linked to appropriate Medicaid service billing categories (e.g., Supported Employment, Community Habilitation).
- **Splitting Billing When Necessary:**
When no single SOC classification covers at least 80% of duties, billing must be split proportionally across service types, based on actual time tracking.
- **Documentation for Compliance:**
Agencies must maintain clear internal records showing:
 - SOC code assignment rationale,
 - Time distribution when applicable,
 - Corresponding Medicaid service codes used for claims.

Applying this structure ensures that Medicaid billing accurately reflects service delivery complexity, skill level, and staffing realities.

5.2. State and Local Contracts

States and municipalities often fund supplemental employment supports, day services, and specialized programs through contracts outside of Medicaid.

Application Principles:

- **SOC-Based Internal Staffing:**
Agencies must maintain internal SOC coding even for staff funded under state and local programs.
- **Cross-Linking State Billing Structures:**
SOC codes must be matched with applicable state service categories or billing codes (where available).
- **Consistent Time Tracking:**
Staff providing services under multiple funding streams must track time according to the type of service performed, not merely by contract source.
- **Avoiding Double Billing Risks:**
Internal SOC alignment strengthens compliance by preventing duplication of services billed under different funding streams.

Implementing these principles at the state and local contract level promotes service integrity and protects agencies during contract audits and renewals.

5.3. Federal Support Programs

Federal agencies such as the Department of Labor (DOL), Department of Education (ED), and Department of Health and Human Services (HHS) provide grants, pilot programs, and funding streams supporting employment, transition services, and independent living.

Application Principles:

- **SOC Integration in Federal Reporting:**
Where federal grants require workforce reporting or outcome measurement, agencies should use internal SOC-coded staffing documentation to align submissions.
- **Linking Grant Activity to SOC Classifications:**
Program activities funded under federal grants (e.g., pre-employment transition services) should be mapped to SOC categories describing the professional work performed.
- **Supporting Evidence-Based Policy:**
Adopting SOC-based reporting helps strengthen federal data on workforce needs, program outcomes, and funding impacts, supporting national policy improvements for individuals with IDD.

Through internal SOC integration, agencies participating in federally funded programs can demonstrate greater accountability, data quality, and alignment with national service classification standards.

6. Benefits of the Proposed Approach

Implementing a standardized framework linking internal job titles to SOC classifications and government funding codes offers significant advantages across operational, financial, workforce, and policy domains.

This section outlines the key benefits of the proposed approach for service providers, funders, direct support professionals (DSPs), and individuals with intellectual and developmental disabilities (IDD).

6.1. Transparency in Reimbursement and Service Reporting

Accurate linkage between workforce classifications, service billing codes, and reimbursement requests promotes transparency across all levels of service delivery and funding.

Key Impacts:

- **Clear Documentation:**
Service billing records can be verified against staffing patterns and job classifications, reducing ambiguity.
- **Enhanced Audit Readiness:**
Providers are better prepared for external audits by Medicaid, state agencies, and federal funders.
- **Fair Service Representation:**
Funders and regulators receive a true picture of the types of supports provided, reflecting actual service complexity and professional skill.

Transparent reporting builds trust among agencies, funders, policymakers, and the communities they serve.

6.2. Equity in Wage Distribution for DSP Workers

Aligning job roles to SOC classifications encourages more equitable workforce practices, particularly in wage determination and compensation planning.

Key Impacts:

- **Skill-Based Recognition:**
Workers performing higher-skilled duties (e.g., employment coaching, behavioral supports) can be appropriately recognized and compensated.
- **Reducing Hidden Labor:**
By preventing the blending of higher-skill tasks into low-skill titles, the true value of DSP work is made visible.
- **Supporting Advocacy Efforts:**
Transparent occupational data strengthens advocacy for wage increases, career ladders, and professionalization of the direct support workforce.

Ultimately, fair compensation strengthens staff retention, morale, and service quality.

6.3. Improved Data for Policy and Funding Decisions

The current lack of standardized occupational classification hinders effective policymaking and funding allocation.

The proposed approach directly addresses this gap.

Key Impacts:

- **Better Funding Justification:**
Agencies and policymakers can use clear workforce data to advocate for sustainable funding levels based on service complexity.
- **Targeted Workforce Development Programs:**
Data on skill needs and service types supports better planning for DSP training, credentialing, and career advancement initiatives.
- **National Data Alignment:**
Integrating SOC classifications aligns agency reporting with national labor force statistics, strengthening evidence-based policy.

Improved data collection and reporting ultimately enhance service system sustainability and quality.

6.4. Workforce Development and Retention Support

A transparent and standardized classification system supports better workforce development at both the agency and system levels.

Key Impacts:

- **Career Pathways:**
Staff can more easily see opportunities for advancement based on clearly defined job roles and competencies.
- **Training Alignment:**
Agencies can align training and professional development offerings with nationally recognized occupational standards.
- **Retention Through Recognition:**
Workers are more likely to remain in the field when their roles, skills, and contributions are clearly recognized and appropriately compensated.

By fostering a professional, stable, and respected workforce, the proposed model helps strengthen the long-term viability of support services for individuals with IDD.

7. Conclusion: Building a Sustainable, Transparent, and Equitable Future

The future of support services for individuals with intellectual and developmental disabilities (IDD) must be built on principles of transparency, equity, and sustainability.

The framework outlined in this guide — linking internal job titles to standardized occupational classifications and aligning those classifications with government funding structures — offers a practical, achievable pathway toward that future.

7.1. Why This Matters

Without clear classification and transparent reporting:

- The contributions of direct support professionals (DSPs) are undervalued and undercompensated,
- Service quality risks decline due to staffing instability and workforce dissatisfaction,
- Funding systems remain disconnected from the realities of service provision, leading to inequities and inefficiencies.

Conversely, by standardizing the relationship between job functions, occupational classifications, and reimbursement structures, we can:

- Ensure fair representation and compensation for frontline workers,
 - Provide policymakers and funders with the data needed to allocate resources effectively,
 - Strengthen service quality and stability for individuals with IDD.
-

7.2. A Call to Action

Implementing standardized internal linking is not merely a technical improvement — it is a commitment to the dignity of the workforce and the individuals they support.

Each service provider, funder, policymaker, and workforce advocate has a role to play in:

- Embracing greater transparency,
- Supporting skill-based recognition,
- Advocating for sustainable funding tied to the true value of services delivered.

By working together to integrate these standards, we can create a stronger, more resilient support service system — one that values every contribution, supports every professional, and empowers every individual with IDD to achieve their fullest potential.

7.3. The Foundation for Quality and Well-Being

The linkage of internal job roles, SOC occupational classifications, and government funding codes — when further supported by clear, field-informed voluntary consensus support standards — forms a robust foundation for quality service delivery.

Support standards built on this structure will:

- Clarify expectations for service delivery aligned with occupational classifications,
- Promote consistent, high-quality supports tailored to individuals with IDD,
- Strengthen protections for the well-being of both the support workforce and the individuals they serve.

By grounding service systems in transparent classification, evidence-based standards, and equitable funding structures, we create the conditions for lasting positive outcomes for people with IDD and those dedicated to supporting them.