**From:** Sharon Hart

**To:** DPH-Testimony, Reg (DPH)

**Subject:** “105 CMR 800 Regulation” AND “105 CMR 801 Regulation"

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[https://www.helioshr.com/blog/what-is-the-paper-ceiling-and-how-does-it-affect-dei](http://www.helioshr.com/blog/what-is-the-paper-ceiling-and-how-does-it-affect-dei)

What is the Paper Ceiling? And How Does It Affect DEI&B?

We have all heard of the glass ceiling, the invisible barrier that prevents equal opportunity. But what is the Paper Ceiling, and how does it affect your Diversity, Equity, Inclusion and Belonging (DEI&B) strategy?

## What is the paper ceiling?

The paper ceiling refers to the fact that so many jobs require an academic qualification, such as a Bachelor’s degree or Master’s degree. A 2022 study found that 62% of employers require a college degree, even for entry-level positions.

However, over 50% of the current workforce does not hold a qualification higher than a high school diploma. These people can’t even get an interview because they don’t have a degree. That is the paper ceiling.

Many of these people have vital skills and knowledge. They may have served in the military, earned a professional certification, run their own business, or have on-the-job experience. But they are shut out because of two words: “degree required”.

## How does the paper ceiling affect workers?

Workers suffer from the paper ceiling, whether they’re currently employed or they’re seeking a job. People encounter issues such as:

**Lower lifetime earnings**: Lower education requirements usually means lower pay. The problem compounds over time, as the person doesn’t have time or money to invest in their career.

**Limited career progression**: Experienced workers often make good managers. However, most people need a degree to apply for managerial roles or leadership training. (as with CHO & RS requirements!)

**Skills stagnation**: People without degrees still have valuable skills and professional knowledge. Normally, employers would help to develop those skills, but the paper ceiling can stand in the way of further training. (as with CHO & RS requirements!)

[https://www.kellyservices.us/us/business\_services/business-resource-center/managing-](http://www.kellyservices.us/us/business_services/business-resource-center/managing-) employees/is-it-discriminatory-to-require-applicants-to-have-a-college-degree/

[https://www.advisory.com/daily-briefing/2021/07/30/degree-requirements](http://www.advisory.com/daily-briefing/2021/07/30/degree-requirements)

# My question(s)/concerns:

Is the State going to fund the degree(takes 4+ years to complete full-time), the certifications (RS needs the 4+ yr degree and then to study and pass the certification) and backfill the Health Dept position with someone for those 4+ years? ...so this means my new hire would not be

able to work the inspector job because they would be in school going for their degree...it would mean time away from the job/person's family...even though they may have the skills/aptitude to pass the R.S. exam? This is also true for the C.H.O. exam.

Example: Workforce standards for Health Inspector

* RS within 6 years of hire
* Foundations course within 18 months of hire
* Specific certifications for inspections performed, such as soil evaluator\*\*\*\*\*\*, system inspector, food inspector training, housing inspection training, certified pool operator/certified pool inspector, lead determinator within 1 year of hire

\*\*\*\*\*\* I have a health agent who cannot take the Soil Evaluator's course because they are the sole caregiver to a child and cannot take "whole" days for classes across the state. that go for 2 months.

# I think this is limiting and discriminating. If these workforce standards cannot be changed(which they should be) then MDPH should have the ability in the regulations to "waive" the degree requirements based on skills/experience/competency.

Thank you for your time,

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