THE STATE 9-1-1 COMMITTEE'S SEPTEMBER 23, 2009 RESPONSE COMMENTS TO STAFF'S FIRST INFORMAL REQUEST FOR COMMENTS ON THE PROPOSED RULES FOR MINIMUM 911 TRAINING STANDARDS

I. INTRODUCTION AND BACKGROUND

On June 23, 2009, the State 9-1-1 Committee voted to make recommendations under MCL 484.1413(1)(b) and (2) in regard to training standards for Michigan 9-1-1 telecommunicators. On July 1, 2009, the State 9-1-1 Office forwarded the Commission a recommended set of guidelines for rulemaking. On August 31, 2009, a proposed draft in rulemaking form was forwarded to members of the State 9-1-1 Committee and other interested parties by Commission staff.

While some of the pieces in the Commission staff's document are reflective of what the State 9-1-1 Committee (SNC) recommended, there are several significant digressions as well. The SNC has reviewed the staff's draft rules and desires to provide additional comments and recommendations to the Commission on this matter.

II. DISCUSSION

PART 3 – APPROVAL OF COURSES

Rule X – Approval of Courses by the Committee

The SNC Recommends that the Commission staff's proposed document be amended to reflect the current process in which the training courses/providers are currently approved by the State 9-1-1 Committee (SNC). MCL 484.1408 (4)(c) identified the SNC as the body to approve the dispatcher training courses. No request or recommendation was made by the SNC to the Public Service Commission staff to change the existing course approval process. The SNC utilizes the system that had been established cooperatively with the Michigan Commission on Law Enforcement Standards (MCOLES) in 2001 when the dispatcher training funds were initially created by Public Act 78 of 1999. The SNC further streamlined the process of course and trainer approval when the course approval process was moved from MCOLES to the SNC through Public Act 165 of 2007. The current application and approval process for courses is on-line through the State 9-1-1 Office. It is effective, timely, and cost-efficient.

The system of course approval introduced in the staff's draft proposal would likely create

unneeded additional work for both trainers and the state, an unnecessary layer of review, and cause delay in course approval. Applications, trainer qualifications, and course evaluations are currently submitted and reviewed by experienced members of the 9-1-1 community. To add additional review and RFP process by another state department adds time and costs, and quite possibly, reducing the much-needed funds that are available to the dispatcher training program. A copy of the SNC's established procedures for the approval of courses are attached as Exhibit 1.

PARTS 4 – TRAINING FUND DISTRIBUTION

Rule X. - Distribution based on Reimbursement

The Commission staff's proposed document changes the current process in which the dispatcher training funds are distributed. There was no request or recommendation from the SNC to change the existing procedure of training fund distribution. The SNC has a long-standing program for the application and distribution of the funds. That program, which is similar to the MCOLES 302 funds distribution, was initiated in 2001 is streamlined, cost-efficient, and accountable. A copy of the SNC's established procedures for the distribution of the dispatcher training funds are attached as Exhibit 2.

The State 9-1-1 Office, in conjunction with the SNC's Dispatcher Training Subcommittee, manages the qualification for and use of the funds in compliance with the statute. An annual audit of the state 9-1-1 fund is performed as per statute (MCL 484.1407[5]) by the Office of the Auditor General (OAG). There have been no findings by the OAG in the course those audits in regard to the distribution of the training funds. A copy of the OAG's 2008 CMRS Fund Audit Report is attached as Exhibit 3.

The proposed system of after-course *reimbursement* in the draft (as opposed to the current up-front distribution system) creates an additional and unnecessary layer of work at the state level not required by the statute. This would not only delay the receipt of the funds to the primary public safety answering points (PSAPs), but may create a disincentive and hardship at the PSAP level to timely train 9-1-1 personnel to meet the standards set forth in the proposed document.

ADDITIONAL COMMENTS

In addition to the two issues noted above, there are omitted definitions, the inclusion of definitions for terms not referenced in the document, and segments of the SNC's original program recommendations that were omitted or were not accurately reflected. A single-sheet matrix noting these differences is

attached as Exhibit 4.

III. CONCLUSION

Attached as Exhibit 5 is a fully revised document in the track changes format required by the Commission's staff. We, the State 9-1-1 Committee, are recommending that Exhibit 5 be used as a replacement for the staff's proposed document. We believe the revised document will continue the SNC's practice of an accountable, efficient, and cost-effective system for course approval and fund distribution, as well as facilitate a minimum training level for all 9-1-1 telecommunicators in Michigan.

Respectfully submitted,

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