



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TREASURY
LANSING

ROBERT J. KLEINE
STATE TREASURER

September 25, 2009

Ms. Robin Ancona, Director
Telecommunications Division
Michigan Public Service Commission
6545 Mercantile Way, Suite 7
Lansing, Michigan 48911

Dear Ms. Ancona:

This is in response to the Michigan Public Service Commission's request for comments pertaining to the 9-1-1 Training standards rulemaking process.

Our department has strong concerns regarding changing the training fund distribution methodology from an upfront-based disbursement process to a reimbursement-based disbursement process. We are opposed to the language in Part 4 (Training Fund Distribution) of the proposed rules (DRAFT 1) for the following reasons:

1. Changing to a reimbursement process would require an extensive amount of additional work for Treasury personnel.
 - a. The current Treasury payment processing system is an automated interface that calculates the semi-annual distributions based on the number of FTE's approved for each PSAP, processing approximately 240 payments each year.
 - b. The current payment processing system cannot accommodate payments of a reimbursement-based distribution and therefore, would require either costly programming changes to the current system or require a manual process that would substantially increase the amount of time and work necessary for Treasury personnel to process the semi-annual distributions and to track and monitor program expenditures.
2. The current payment process has been in place for the last nine years. This methodology has been audited on an annual basis by the Auditor General's Office and they have not found any audit findings pertaining to the distribution of PSAP training monies.

Ms. Robin Ancona
Page 2
September 25, 2009

3. Since the current payment methodology has been in existence for nine years and the Emergency 9-1-1 Service Enabling Act has been amended by the Legislature numerous times, it seems the legislative intent is to have the training money distributed as we are currently doing. If not, the Legislature has had ample opportunities to change the legislation to stipulate that the PSAP training fund distributions should be made under a reimbursement-based method rather than the current payment method.

It is Treasury's proposal to maintain the current payment methodology and place the current procedures into the rules. Attached is an alternative proposal for Part 4 of the rulemaking process for Public Safety Answering Point personnel training standards.

If you have any questions or concerns, please let us know.

Sincerely,

Donna M. Donovan
Deputy Treasurer

Enclosure

c: Evah Cole

DEPARTMENT OF ENERGY, LABOR, AND ECONOMIC GROWTH

PUBLIC SERVICE COMMISSION

TELECOMMUNICATIONS SERVICES

(By authority conferred on the public service commission by sections 408(4)(c) and 413 of 1986 PA 32 as revised, MCL 484.1408 and 484.1413)

PART 4: TRAINING FUND DISTRIBUTION

R 484.XXX Training Fund Distribution

Rule X. Distribution based on **FTE Reimbursement**

~~1. Beginning January 2XXX, all PSAPs will bi-annually forward requests for reimbursement to the committee~~

~~(a) Name of employee~~

~~(b) Employment Status~~

~~(c) Training Status~~

~~(d) Coursework including hours and expenses~~

~~(e) PSAP expenses in addition to coursework~~

~~(f) PSAP information for payment~~

1. Training money shall be requested annually by written request from a primary PSAP or county to the committee. Written requests must be received on or before **February 15th (February 17, 2010)** and must include all of the following:

(a) DTS-101 Form

(b) DTS-101W Form

(c) DTS-510 Form

2. Training money shall be authorized by the committee to approved PSAPs or counties based on the information submitted and use of previously authorized training funds.

3. PSAPs or counties that receive training money shall make available to the committee a detailed accounting of expenditures related to its 9-1-1 training program.

4. Training money shall be disbursed semiannually in May and November to authorized PSAPs or counties for training PSAP personnel through courses certified by the committee for basic 9-1-1 operations and/or in-service training to employees engaged in 9-1-1 service.

5. Training money disbursements shall be calculated by multiplying the number of FTE's for the individual PSAP or county by the PSAP distribution rate. The PSAP distribution rate equals the total amount of revenue available for distribution divided by the total number of approved FTE's.

6. Training money not used within 5 years or for a purpose considered unnecessary or unreasonable by the committee or auditor general shall be repaid to the fund.

~~2. The committee shall process the bi-annual requests for reimbursement for payment by the Michigan Department of Treasury.~~

History: 2007 MR XX, Eff. December 31, 201X