

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)

Comment [JM1]: Thank you for the very significant work that went in to developing this draft document and in advance for taking time to consider my very lengthy comments. I hope they are helpful. Feel free to contact me if needed.

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PART 1, GENERAL PROVISIONS

R 484.XXX Applicability.

Rule 1.

- (1) These rules apply to public service answering points as defined by the Emergency 9-1-1 Services Enabling Act, PA 32 of 1986, as revised.
- (2) Compliance with the provisions of this rule shall be mandatory no later than December 31, 2010.
- (3) Compliance with the provision of this rule shall also be mandatory for all new and existing employee of a Michigan Public Safety Answering Point after the effective date of this rule.

History: 2008 MR XX, Eff. Dec 31, 201X

R 484.XXX Definitions.

Rule 2. (2) As used in these rules:

- (a) "Act" means the Emergency 9-1-1 Services Enabling Act, P.A. 32 of 1986, as revised.
- (b) "Basic Telecommunicator Training" (need definition)
- (c) "Commission" means the Michigan Public Service Commission. (9-1-1 Law)
- (d) "Committee" means Michigan's State 9-1-1 Committee.

- (e) "Communications Service" means a service capable of accessing, connecting with, or interfacing with a 9-1-1 system, exclusively through the numerals 9-1-1, by dialing, initializing, or otherwise activating the 9-1-1 system through the numbers 9-1-1 by means of a local telephone device, cellular telephone device, wireless communications device, interconnected voice over internet device, or any other means. (9-1-1 Law)
- (f) "Date of Hire" means the start date of work as documented in the Telecommunicator's personnel record. (Manual)
- (g) "Delinquent Telecommunicator" means either (1) a telecommunicator whose training records on file with the State 9-1-1 Office indicate that the individual has not completed Modules 1 and 2 within the time period required for Trainee

Telecommunications and notification of the telecommunicator's delinquency has been sent to the director of the Primary PSAP(s) employing the individual as required by these rules or (2) A telecommunicator who has not completed any required continuing education as required by these rules and notification of the telecommunicator's delinquency status has been sent to the directors of the Primary PSAP employing the individual, as required by these rules. (Manual)

(h) "Designated Telecommunicator" means any person that has completed the required training within the required timeframe. (Manual)

(i) "Emergency Medical Dispatch" (EMD) is the process for taking requests for emergency medical assistance, identifying the nature of the request, and prioritizing the severity of the request based on the emergency medical dispatch agency's local policies and procedures. This also includes dispatching the necessary resources, providing pre-arrival medical and safety instructions to callers, and coordinating the responding resources as needed. (Training Standards) – Public Health Law

(j) "Emergency Medical Services" (EMS) provides early treatment to those in need of urgent medical care, and ultimately rapid transportation to an emergency department. (Training Standards) Public Health Law

(k) "In-service Training" (need definition)

(l) "Leave of Absence" (need definition)

(m) "Master Street Address Guide" (MSAG) means a perpetual data base that contains information continuously provided by a service district that defines the geographic area of the service district and includes an alphabetical list of street names, the range of address numbers on each street, the names of each community in the service district, the emergency service zone of each service user, and the primary service answering point identification codes. (9-1-1 Law)

(n) "Public Safety Answering Point" (PSAP) means a communications facility operated or answered on a 24-hour basis assigned responsibility by a public agency or county to receive 9-1-1 calls and to dispatch public safety response services, as appropriate, by the direct dispatch method, relay method, or transfer method. It is the

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first point of reception by a public safety agency of a 9-1-1 call and serves the jurisdictions in which it is located and other participating jurisdictions, if any. (9-1-1 Law)

(o) "Request for Proposal" (RFP) a method of determining, often through a bidding process, a procurement decision through a risk and benefit identification process.

(p) "Telecommunicator" means a person who is trained and employed in public safety telecommunications. The term applies to call takers, dispatchers, radio operators, data terminal operators or any combination of such functions in a PSAP. (Standards)

(q) "Trainee Telecommunicator" means a person hired as a telecommunicator less than 12 months before the effective date of these rules or a person hired after the effective date of these rules who has not yet completed Training Modules 1 and 2 but is still within the required time period for completion of Modules 1 and 2. (Manual)

(r) "Undesignated Telecommunicator" (need definition)

(s) "Workspace" means the physical building area where work is normally performed. This is a net square footage measurement which includes hallways, conference rooms, rest rooms, and break rooms but does not include wall thickness, shafts, heating/ventilating/air conditioning equipment spaces, mechanical/electrical spaces or similar areas where employees do not normally have access. (NENA)

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

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PART 3: APPROVAL OF COURSES

R 484.XXX Approval of Courses

Rule X. Approval of Courses by the Committee

1. All course approval requests must indicate:
 - a. Classification of course based on Part 5, 1.(3) and 2.(3)
 - b. Subject matter and intended job level of participant
 - c. Length of course time
 - d. Module or in-house training requirement
 - e. Cost of the course
 - f. Method of instruction including instructor and vitae
 - g. Course completion requirement
 - h. Request For Proposal (RFP) information has been submitted to the state 9-1-1 office for review by the Office of Management and Budget
 - i. Proof of Instructor Certification
 - j. Additional information as required by the committee
2. Course approval process
 - a. Course approval process must be led by two members of the committee
 - b. Training courses held by college or universities in the state of Michigan must meet the classification rules in Part 5, 1.(3) and 2.(3)
 - c. Subsequent course approvals (Rule X, Part 4) will include student evaluations of the course
 - d. Written approval by the office of Management and Budget to accept the RFP of the trainer or company
 - e. Written minutes of all meetings regarding the course approval process will be posted on the committee website.
3. Initial course approval:
 - a. Will be completed 60 days after submission to the committee
 - b. Classification of the course based on Part 5 of the rules
 - c. Cost of the course including necessary materials
 - d. Scheduling information of the course (location, dates, times)
 - e. Approval will be in place for 18 months.
4. Subsequent course approval:
 - a. Will be completed 60 days after submission to the committee
 - b. Classification of the course based on Part 5 of the rules
 - c. Cost of the course including necessary materials

Comment [JM2]: RE: "PART 3: APPROVAL OF COURSES R 484.XXX

Rule X

1.b

Make item "b" exclusively about *subject matter*, and amend to read: "[Subject matter] to include all elements of the core standardized curriculum for this course as established by the committee, and citing information sources for all significant course content."

Explanation: This additional wording implies: ... [1]

Comment [JM3]: RE: 1.f

"f." should address only Method of instruction. consider creating a separate item "g" to address exclusively the *instructor's qualifications*, and consider including the content of item "i" by stating: "[Name, licensure and/or certification and curriculum vitae of Instructor and, if separate person, the course curriculum developer." Item "i." could then be eliminated. ... [2]

Comment [JM4]: RE: 1.h

The idea of OMB functioning in this role seems problematic. See my comments related to item 2a. If RFPs are used with approval by OMB great care will be needed to determine cost effectiveness versus merely cost containment when reviewing a proposal. Close and genuine collaboration between OMB personnel and State 911 Administrator's office, the committee and experts in module content will be essential. Witho ... [3]

Comment [JM5]: RE: 2.a

1. I interpret the purpose of this item to assure that individuals with 911 expertise participate in the approval process to augment the knowledge of OMB personnel. But does this mean that no more than two members will be involved in the approval process? Which two are chosen, and how? This and the selection process should be defined.
2. In this section on course approval there should be a statement to ... [4]

Comment [JM6]: RE: 2.c

The inclusion of this article is valuable only if:
A. The statement includes a clause such as "...All such evaluations must be designed in accord with the specifications established by the committee, and be pre-approved by the committee."
Rationale: once we have established core courses within the two modules, evaluations must be standardized to measure student's response to ... [5]

- d. Scheduling information of the course (location, dates, times)
 - e. Approval will be in place for 18 months.
 - f. Student evaluations of the course will make up 35% of the evaluation process
- 5. Course approval requests denials
 - a. Denials based on non-approval of the RFP by the Office of Management and Budget are not under the purview of the committee
 - b. A request for review of a course denial may be made to the entire committee in writing
 - 6. Course discontinuance during the 18 month approval period
 - a. Poor student evaluations with follow-up audit by the committee
 - b. Changes in course instructor, scheduling, materials, or cost

Comment [JM7]: RE: 2.f
 How was this percentage arrived at? And, in light of my concerns above, it is crucial to define what comprises the other 65%.

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

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PART 4: TRAINING FUND DISTRIBUTION

R 484.XXX Training Fund Distribution

Rule X. Distribution based on 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
- 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

PART 5: TRAINING REQUIREMENTS

R 484.XXX Training Requirements

Rule X. Minimum Telecommunicator Training Requirements

- 1. Module One – Trainee Telecommunicator
 - (a) A forty (40) hour basic telecommunicator course with basic requirements:
 - (1) Completion within 18 months of the rule effective date
 - a. New hires: Completion within 18 months of the date of hire
 - (2) State 9-1-1 Committee approved courses
 - (3) Comprised of the following subject matter:
 - a. Overview of public safety – police, fire and emergency medical services

- b. Telecommunicator Roles and Responsibilities
 - c. Legal Aspects of Dispatcher Services
 - d. Interpersonal Communications
 - e. Public Safety Technologies
 - f. Telephone Techniques
 - g. Call Classification
 - h. Radio Communications
 - i. Stress Management
2. Module Two –Trainee Telecommunicator
 - (a) Forty (40) hours of training
 - (1) Completion within 24 months of effective date of rules
 - a. New employees: Completion within 24 months of the date of hire
 - (2) State 9-1-1 Committee approved courses
 - (3) Comprised of 8 hours of each of the following subject matter:
 - a. Domestic Violence
 - b. Suicide Intervention
 - c. 9-1-1 Liability
 - d. Stress Management
 - e. Homeland Security Elective
 3. Continuing Education
 - (a) Twenty-four (24) hours every 24 months
 - (b) Full and part-time employees
 - (c) State 9-1-1 Committee approved courses

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4. Student evaluation of the course is mandatory prior to receiving reimbursement for the course and additional costs.
5. Additional Training is the responsibility of the employing agency.
6. Telecommunicators who are employed by Primary PSAPs before the effective date of this rules are defined as Designated Telecommunicators required to complete 24 hours of continuing education within 24 months of the effective date of the rules.
 - (a) A designated classification may be maintained should a telecommunicator Change employment and the lapse in employment is no longer than 3 months.
7. Continuing education requirements for each 24 month period may be extended due to leave of absence.
 - (a) Primary PSAP Director is responsible for contacting leave of absence information to the state 9-1-1 office.
8. Non-compliance
 - (a) A telecommunicator that is in non-compliance status with these rules is determined to be undesignated (Need a definition).
 1. An undesignated telecommunicator are disqualified from performing dispatch duties, except in exigent circumstances for less than 2 hours.
 2. The PSAP Director will provide, within 30 days of designation, a training plan for the undesignated telecommunicator to complete within 180 days of the plan.

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

PART 6: ADMINISTRATIVE PROCESS

R 484.XXX Administrative Process

Rule 7. State 9-1-1 Office shall complete the following processes:

1. Maintain the confidential registry of Michigan PSAP Telecommunicators.
 - a. Hire date
 - b. Telecommunicator status
 - c. Mandatory coursework needed
 - d. Mandatory coursework completed
 - e. Leave of absence information
 - f. Changes in employment status
 - g. Training funds used
2. Provide monthly updates to PSAP directors of course availability
3. Provide notification to PSAP directors of change in employee's classification
4. Provide evaluation tools to PSAP employees on each course.
5. Provide information to the Michigan Department of Treasury for PSAP bi-annual reimbursement of training costs.
6. Provide information to the Department of Management and Budget to develop RFP information for telecommunicator course providers.

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

PART 7: WAIVERS

R 484.XXX Waivers

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

PART 8: EXCEPTIONS

R 484.XXX Exceptions

**RE: "PART 3: APPROVAL OF COURSES
R 484.XXX****Rule X****1.b**

Make item "b" exclusively about *subject matter*, and amend to read: "**[Subject matter] to include all elements of the core standardized curriculum for this course as established by the committee, and citing information sources for all significant course content.**"

Explanation: This additional wording implies:

1. As with EMD and other certification courses, decisions about the content to be included in state-required modules should not be left entirely to the discretion of the curriculum developer or instructor, since some may omit vital information while imparting information of little value in equipping the student telecommunicators. It is the state's responsibility to assure best practice in training or at least to define minimum standards for course content to be upheld in all courses. Without such governance, there is no uniformity in content or in quality.
2. That far more detailed information from and about courses should be required and reviewed by the committee to provide adequate basis for evaluation. This matters more when core curriculum elements are more defined by the state.

Rationale: using the course, Suicide Intervention as an example, course content cannot be selected or constructed subjectively, by depending on the "personal experience" of the instructor or curriculum developer: effective suicide intervention depends on familiarity and appropriate use of current knowledge from Suicidology research findings indicating the greatest suicide risk factors. See also "f." regarding this.

RE: 1.f

"f." should address only Method of instruction. consider creating a separate item "g" to address exclusively the *instructor's qualifications*, and consider including the content of item "i" by stating: "**[Name, licensure and/or certification and curriculum vitae of Instructor and, if separate person, the course curriculum developer.**" Item "i." could then be eliminated.

Rationale:

A. The pursuit of "best practice" in telecommunicators training must include the adoption of more rigorous standards for approval of instructors and curriculum developers. The ENP certification, for example, should be required of instructors teaching Module 1 (unless otherwise certified/licenses in their field to teach the course) since the ENP designation is a nationally recognized credential providing assurance of core knowledge in 911 telecommunication; likewise, a module 2 course such as Suicide Intervention, due to the complex subject matter, requires mental health expertise to write trustworthy curriculum and to teach; thus it should only be developed and taught (or at least co-taught) by licensed mental health professionals.

B. I am unaware of any proposal to recognize the important distinction between the two roles of *curriculum developer* and *course instructor*: not all instructors are also the curriculum authors for courses they teach. We must scrutinize the qualifications of not only the instructor who delivers the curriculum but also the individual who wrote it.

RE: 1.h

The idea of OMB functioning in this role seems problematic. See my comments related to item 2a. If RFPs are used with approval by OMB great care will be needed to determine cost effectiveness versus merely cost containment when reviewing a proposal. Close and genuine collaboration between OMB personnel and State 911 Administrator's office, the committee and experts in module content will be essential. Without such, it is unfair to burden the OMB with the responsibility of assessing the quality of a given proposal unless they are staffed with personnel with expertise in emergency telecommunication, law enforcement, and mental health.

RE: 2.a

1. I interpret the purpose of this item to assure that individuals with 911 expertise participate in the approval process to augment the knowledge of OMB personnel. But does this mean that no more than two members will be involved in the approval process? Which two are chosen, and how? This and the selection process should be defined.
2. In this section on course approval there should be a statement to the effect that "Members of the committee shall not participate in review of proposals when such would constitute a conflict of interest due to personal or vocational involvement of that committee member in which personal advantage for self or associates might result."

Rationale:

A) Vendors are entrusting their intellectual property (i.e., curriculum content, terminology, and structure) to the review committee. If reviewing members are also affiliated with competing vendors in that same course classification, this places the security of the information at risk.

B) Committee members with such conflicts of interest may at will vote for rejection of a proposal not on its merits but to secure the bid of their favored associate.

While "guidelines" may exist outside the proposed rules and current subcommittee members are required to affirm a more general conflict of interest clause, such do not carry the weight of law as the seriousness of risk at issue here demands.

RE: 2.c

The inclusion of this article is valuable only if:

- A. The statement includes a clause such as "**...All such evaluations must be designed in accord with the specifications established by the committee, and be pre-approved by the committee.**"

Rationale: once we have established core courses within the two modules, evaluations must be standardized to measure student's response to the same core curriculum elements irrespective of who the instructor is. Otherwise, the OMB will be comparing apples and oranges upon review of evaluations with no defined and universal criteria.

Implication of this recommendation: Subcommittee on Curriculum Development and Evaluation" This suggests the need for such a subcommittee established permanently within the State 911 Administrators Office (to function in the manner and with the focus of the original Dispatch Training Standards Workgroup.

- B. A separate item or addendum to this item states: "**Standardized examinations will be administered at the conclusion of each module course to be completed by all students measuring their attainment of the knowledge and skills included in the committee-approved curriculum for the course.**"

Explanation and Rationale: There is much skepticism among members of the 911 community that creating an RFP process will lead to approval of courses solely based on cost of course, i.e., the less it costs, the greater the likelihood of its approval, without regard for quality and effectiveness in equipping the student. All stakeholders in the 911 community, including public taxpayers who fund 911 training have a vested interest in assuring not only cost conservation, but *cost-effectiveness*. And careful measurement of cost-effectiveness can only be achieved by:

1. Measuring the degree of student attainment of specific knowledge defined as essential to effecting their duties.
2. Utilizing the same standardized assessment instruments to evaluate the effectiveness of all approved courses/instructors.