

The Mission of the 911 Coordinating Council is to serve Kansas PSAPs by implementing a coordinated, sustainable, and comprehensive NG911 service that responds anytime, anywhere, from any device in order to realize the full potential for 9-1-1 to provide public access to emergency services.

Audit of the Kansas 911 System

On Behalf of the Legislative
Division of Post Audit

Brevitz Consulting Services

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Executive Summary

The Kansas 911 Act (“the Act”) established the Kansas 911 Coordinating Council to ensure the implementation and operation of the Kansas NG911 system. K.S.A. 12-5377 requires the Legislative Post Audit Division to conduct a Kansas NG911 System Audit every five years to determine:

1. What is the status on NG911 service implementation;
2. Whether the moneys received by PSAPs pursuant to [the Kansas 911 Act] are being used appropriately; and
3. Whether the amount of moneys collected pursuant to [the Kansas 911 Act] is adequate.

In performing this audit, we conducted approximately 30 interviews with the primary stakeholders (Coordinating Council members, Staff and PSAPs and other stakeholders), to obtain a full 360-degree view of current NG911 services in Kansas. We also developed a survey which was sent to all Kansas PSAPs to gain additional insights into their views of the effectiveness of Kansas NG911 policies, NG911 system support, and NG911 system technology infrastructure. We are grateful for the PSAP administrators taking time to provide this survey information, recognizing that they often feel “over-surveyed”. Finally, we monitored the most recent Coordinating Council meetings to capture the essence of the Council’s current activities, projects, issues and direction.

Federal Matters and the Current Status of the Kansas NG911 System

The Act defines “Next Generation 911” as “911 service that conforms with National Emergency Number Association (NENA) i3 standards¹ and enables PSAPs to receive Enhanced 911 service calls and emergency calls from Internet Protocol (IP) based technologies and applications that may include text messaging, image, video and data information from callers. “

These platforms are expensive – while the Act provides funding through 911 fees, Congress is working on grant funding to implement a comprehensive NG911 system across the country,

¹ The NG911 i3 standard is the “keystone” in NENA’s family of NG911 standards and facilitates end-to-end IP connectivity.

based on cost estimates from a 2018 study² for nationwide NG911 deployment of between \$9.5 billion and \$12.7 billion. Last year the Public Safety Next Generation 911 Coalition updated that estimate to \$15 billion to account for cost increases and increased spending on cybersecurity.³ The House Energy and Commerce Committee passed legislation to reauthorize the FCC's authority to conduct spectrum auctions⁴ with \$14.8 billion in auction proceeds to fund grants to states for NG911. However, these grant funds would not be available to states identified by the FCC as "fee diverters". This is not an issue for Kansas since the Act places Council funds outside the state treasury, not subject to being swept or redirected.

The FCC is finalizing rules to expedite NG911 nationwide deployment as well as require Telecommunications Relay Services be integrated into NG911. While Kansas is well positioned to comply with these requirements, the Coordinating Council is planning now for these new rules and will maintain its national leadership position by doing so.

The Americans with Disabilities Act (ADA) required among other things that 911 become accessible for individuals unable to use the telephone. Since that time Real Time Text (RTT) has become a modern alternative to outdated TTY technology. NENA has been proactive in integrating RTT into its i3 architecture for Next Generation 911. RTT is planned to be added to the Kansas NG911 system in the first half of 2024.

In 2020 the FCC established the 988 prefix for the national Suicide and Crisis lifeline. This number does not run through the 911 system and is routed in the network differently. The Council is providing its expertise to the Kansas Department for Aging and Disability Services to support 988 deployment in Kansas.

The migration in Kansas from legacy circuit switched networks and Time Division Multiplexing (TDM) transmission technology to the newer Internet Protocol (IP)-based

² Next Generation 911 Cost Estimate: A Report to Congress, October 2018, submitted by the National Highway Traffic Safety Administration and the National Telecommunications and Information Administration.

³ "Next Generation 9-1-1 Fact Sheet", <https://ng-911coalition.org/next-generation-9-1-1-fact-or-fiction/>

⁴ The Federal Communications Commission administers and manages the country's electromagnetic radio spectrum which is used for wireless and broadcast services. Since 1994 the FCC has conducted spectrum auctions to grant licenses and permits for its use. These auctions have numerous benefits including earning substantial funds from qualified bidders who win the auction for various slices of the spectrum. Congress allocates the auction proceeds in the budget such as in the recent House Energy and Commerce Committee legislation which allocates \$14.8 billion in auction proceeds to fund grants to states for NG911.

Other vendors are included in the AT&T contract as subcontractors to provide additional features and services supporting Kansas NG911 such as RapidDeploy for enhanced mapping and situational awareness and ECaTS for real time reporting analytics.

Migration of the ESInet from Virtual Private Networking to a faster, more reliable switched ethernet platform known as AT&T ASE is nearly complete. Since ASE circuits are more economical the Council has been able to add a commercial broadband connection at every PSAP as a redundant means of connectivity to the Statewide Hosted Call Handling System. The additional commercial connection provides another level of redundancy to keep PSAPs connected in the event that their primary circuit goes down. FirstNet LTE is now a tertiary backup for this purpose. An Emergency Mobile Dispatch and Training Center (EMDTC) is being constructed for the Council to provide additional network survivability and mobile disaster response and mobile training capacity.

Through the efforts of the Council, its staff and stakeholders including PSAPs, the State of Kansas has set a high national standard in modernizing emergency response systems and created an exemplary model for other jurisdictions to follow. The Kansas NG911 system is a world class NG911 system implementation and is nationally recognized in the public safety community as leader in NG911. However, as technology evolves, so will the need to continue to upgrade the NG911 system and incorporate ever-developing new features and capabilities.

Appropriate Use of 911 Fees by PSAPs

Annual PSAP expenditure reporting to the Council and Expenditure Review Committee (ERC) review of same in 2021 and 2022 have greatly improved over prior years. This is the result of PSAPs honing their own processes for expenditure reporting, and improvements on the Council side in the 911 Portal used for submission of expenditures, focused training provided by Council staff on allowable expenditures and the expenditure reporting, and the Committee's provision of updated FAQ answers regarding the process and a list of approved expenditures which is expanded and updated in "real time" with newly approved types of expenditures. In 2022 the ERC began meeting in the first week of March and closed the PSAP expenditure reviews much more promptly than in previous years (the 2022 review was largely concluded by June 2023). This is a very significant improvement over years past and is attributable to big staff

effort particularly from the North and South PSAP Liaisons to clear the backlog for prior years and stay on top of accomplishing the current year review, plus the payoff from education and communication efforts with the PSAPs regarding expenditure review and documentation.

The Council continues to seek to improve the expenditure review process with new members on the Expenditure Review Committee with budgetary decision-making authority in their regular position, to bring the perspective of persons that are responsible for administering budgets and expenditures to the review process. The ERC's role is being honed to strictly interpret allowable expenditures under the Act, analyze the processes to make sure the Committee is compliant with Act, while remaining supportive of the PSAPs.

We find the actions of the PSAPs, Council and the ERC have ensured 911 fee moneys are being spent on only allowable items under the Act.

Adequacy of 911 Fee Funding

In Kansas responsibility for funding PSAPs and 911 is divided between the State of Kansas and local government (cities and counties). On average, PSAPs get 16% of their funding from the state 911 fee and the remaining 84% from local government general funds. City and county government units are presently covering five-sixths of the cost of the 911 system in Kansas. As in many environments personnel costs are by far the largest category of expense. Since staffing costs are an unallowable expense under the Act local government general funds cover all PSAP staffing costs. Furthermore, PSAPs indicate they are funding some allowable expenditures locally to conserve 911 funds for larger projects.

The current state fee is \$0.90 per wireline account per month and 2.06% of prepaid wireless services. The FCC's Fourteenth Annual 911 Fee Report shows that Kansas fees are at the low end of the range of fees and below the average of states reporting their fees.

The Council performs Business Case projections to address adequacy of funding assuming required upgrades of continued NG911 system operations and roll out of further i3 NG911

capabilities. Since 2012 the Council has saved cash and investments⁵ to fund planned system upgrades and investments in i3 future technology and capabilities as well as other costs. The list of i3 features is extensive and includes enhancements to the ECaTS system, PSAP to PSAP chat, pilot and proof of concept for 3D and indoor mapping, Automated Automatic Callback, RAVE panic buttons for schools, PSAP access to third party databases, geospatial search capabilities, integration of KDOT cameras, roll out of RapidDeploy’s “Lightning app” (which provides NG911 call and mapping data and critical information directly to a first responder’s smart phone or tablet), TRAINFO, real time transcription of calls, integration of drones, and more.

The i3 projects fall into one of three categories – mandatory, essential, and beneficial. The total cost of i3 projects in all three categories is estimated to range from \$12 - \$14 million annually through the projection period 2023 - 2030. **Based on the projections provided in the Business Case and the Council’s ability to defer certain projects, if necessary, it appears funding is adequate through the projection period to 2030.** If necessary “beneficial” projects could be deferred but at the cost of loss of important functionality.

However, many PSAPs indicate funding is inadequate from their perspective. While revenue from the 911 fee has stayed flat, most if not all PSAP costs have increased. PSAPs state they are seeing decreased ability to plan for future maintenance and equipment upgrades. Local jurisdictions are strongly constrained from increasing taxes to provide greater funding to PSAPs.

Findings and Issues to Consider

The Council and its Chairman are taking a more hands-on approach to managing the continuous evolution of NG911 for Kansas. The Council is driving for greater transparency among all stakeholders for critical NG911 platform and operating decisions.

The Council currently has **voting and non-voting members** under the Act. The structure has largely worked but one could wonder why statewide representatives of elected officials with budget authority over local PSAPs and public safety – the Kansas Association of Counties and

⁵ Cash and investments totaled \$42.8 million in the most recent Council financial report. This balance fluctuates month to month and is planned to be expended on i3 projects and system upgrades over time under the Business Case.

the League of Kansas Municipalities – are non-voting Council members. A similar point could be made for the two currently non-voting representatives of “non-traditional PSAPs” (currently served by University of Kansas Public Safety and Potawatomi Tribal Police). However, this would require legislative change.

Council staff’s knowledge, talent and dedication is a tremendous positive for the Council, the public safety community in Kansas and the state as a whole. This relatively small, contracted Council staff team deserves a great deal of credit for deployment of the NG911 system in Kansas that is highly regarded among its peers in the public safety community. But this raises a critical concern: **succession planning**. Each staff member has their own specialized knowledge and there is not an obvious successor for any staff member to which this knowledge has begun being transferred. The Council could consider hiring additional more junior or assistant level staff as part of the approach to succession planning.

There are some **concerns over the present structure** under which the Local Collection Point Administrator (LCPA) manages Council staff. There are views that the Council is to manage and direct staff under the Act, not the LCPA, with other concerns that the term of the LCPA contract is not coterminous with the independent contractor contracts⁶ and also concern regarding the Council, who are all volunteers, having the capacity for any day-to-day management of staff which may be necessary. This may necessitate a change in the management structure for the current NG911 staff and might warrant legislative change. The Council has recognized this and is forming a working group to assess these issues. Regardless of any changes it is essential not to disrupt the current momentum and excellence that the existing contractor staff has created.

A **single prime contract provider** offers many benefits to the State. However, AT&T’s position as the single prime contractor for the statewide NG911 system introduces a need to discuss and manage cost controls for future upgrades, enhancements and additional features since moving the platform to a different vendor upon expiration of AT&T’s current contract would be extremely complex. When the contract term expires, or existing staff have turned over

⁶ It should be noted that Staff contracts are, by contractual provision within the LCPA contract, transferrable assets. If a new LCPA is chosen by the Council, staff contracts along with motor vehicles would be transferred to the new LCPA. There is requirement in the RFP issued for LCPA services that any bidder is willing to accept those transfers.

or retired, it may become very difficult to move away from the incumbent provider, even if that is the desire of the Council. For all the reasons that made a sole provider the best solution for Kansas NG911, it also introduces complexities for how to best manage future costs or switch to another provider.

Council/Staff discussions on these matters should focus on AT&T cost control and staff succession planning. The existing relationships appear to be working well today. That can always change quickly and having an action plan on these matters now is highly recommended. We see an urgent need to begin transferring knowledge and planning for future staff transitions since the intricacies of the Council's relationship with AT&T are in the hands of three dedicated individuals – two of which are contractors to the LCPA.

There are also concerns regarding **PSAP staffing**. As technology changes, so does the workforce needed to support NG911. Pay for PSAP telecommunicators in many places is too low to attract and retain qualified staff, especially given the long hours and high stress associated with the position. According to the PSAP Survey less than half the PSAPs consider they are “fully staffed”. This is one factor driving examination of consolidation of PSAPs or other alternatives. It may be feasible to examine a work from home model through a pilot study to help augment these staff shortages.

Training

The evolution of the NG911 system and addition of new features and capabilities drives the need for and importance of continued training for PSAP administrators and telecommunicators. Numerous new i3 features and capabilities are available for deployment on a continuous basis. PSAPs requested a wide range of training for their PSAP telecommunicators via the PSAP Survey.

New FCC rules will result in new and increased volumes of emergency calls from the Deaf and hard of hearing community against a backdrop of preexisting unfamiliarity at PSAPs with use of TTY and similar devices. Integrating TRS services into NG911 may require specialized training to be developed outside of the normal operational training requirements.

The Council should conduct self-evaluation to assess the current level of service provided to people with disabilities, identify gaps, implement solutions, and ensure that its emergency

response system meets ADA requirements. The Commission for the Deaf and Hard of Hearing could assist the Council in setting priorities for training and feature implementation to provide direct access for the deaf and hard of hearing community.

The Kansas Hosted Call Handling System is ideally suited to support consolidation of PSAPs which would be transparent to the 911 caller. However, consolidation momentum has slowed since there is some uncertainty regarding future Council disbursements for 911 to consolidating jurisdictions. The Council has recognized the impact of these uncertainties and is forming a working group to assess potential solutions. This may be an area the Legislature could clarify in the Act.

Emergency Communications and the Evolution of 911

911 Emergency Calling Systems evolved over time on a common path in the United States. The three-digit telephone number “911” is the single number established in 1968 for nationwide reporting of emergency situations. Modification to telephone company central office exchange equipment was required across the country to recognize and route 911 calls. 911 service technology evolved from “Basic 911” routed calls to a Public Safety Answering Point (“PSAP”) in the caller’s telephone exchange to “Enhanced 911” which is database driven to route the emergency call to the appropriate PSAP for the caller’s location while automatically displaying the caller’s phone number, address, and other information.⁷

Today, approximately 96% of the geographic U.S. is covered by some type of 911 because of these efforts by all public safety stakeholders.⁸ However the emergence of new wireless technology and the continued growth in wireless subscribers quickly demonstrated significant limitations inherent to the older 911 system: wireless calls were not always routed to the appropriate PSAP, and such calls did not include wireless caller information. The need to further public safety by overcoming these limitations prompted action by policymakers and the search for solutions. The Kansas Legislature addressed these concerns by first establishing the Wireless Enhanced 911 Advisory Board and subsequently establishing the 911 Coordinating Council through the Kansas 911 Act.

Evolution to NG 911

The evolution of NG911, short for Next Generation 911, can be traced back to 2002 when the U.S. Department of Transportation (DOT) and the National Highway Traffic Safety Administration (NHTSA) introduced the vision of NG 911 to the Public Safety industry to begin addressing issues in emergency response caused by dramatically increasing demand and use of wireless mobile services. Since introduction of that vision there have been numerous milestones⁹ including Congressional action to establish the National 911 Office to support and promote optimal 911

⁷ E911 “is a system which routes an emergency call to the appropriate 911 answering point for the caller’s location, AND automatically displays the caller’s phone number and address”. “9-1-1 Basic Information”, the National Emergency Number Association (NENA) <https://www.nena.org/page/911GeneralInfo>.

⁸ “9-1-1 Origin and History”, National Emergency Number Association (“NENA”), viewed October 1, 2023. <https://www.nena.org/page/911overviewfacts>

⁹ The DOT Role in Advancing 911; <https://www.911.gov/historyof911.html>

services (at NHTSA and the National Telecommunications and Information Administration/NTIA), release of NG911 system technical and engineering architecture design and transition plan (2009), begin voluntary data collection from states via NASNA (2011), delivery of NG911 cost estimates for implementation and sustainment of NG911 nationwide (2018), and establishment of federal grant program for upgrades to NG911 (2019).

Description of NG911 Technology

Nationwide, including in technologically progressive regions such as Kansas, telecommunication entities are undergoing a pivotal shift. The transition from traditional copper infrastructures to advanced fiber networks is not merely a replacement of materials but a strategic move to enhance service quality, optimize operational efficiency, and minimize maintenance expenditures. This metamorphosis is precipitating a rapid evolution of the nation's telecommunications framework towards a comprehensive Internet Protocol (IP)-based system.

Similarly, NG911 is a transformative upgrade to traditional 911. Unlike the traditional 911 system, which relies heavily on voice calls and lacks the ability to handle modern communication methods effectively, NG911 is designed to embrace the digital age fully. It is IP-based and represents a significant leap forward in the world of public safety and telecommunications.

Today's public relies heavily on a diverse array of communication methods, from voice calls to text messages, images, videos, and even social media. Traditional 911 systems, while revolutionary in their time, are not equipped to handle this multifaceted communication landscape. The limitations of these systems become evident when considering scenarios such as a witness trying to send photo or video footage of a crime scene or a distressed and threatened individual attempting to discreetly text for help.

NG911 addresses these challenges head-on. Through its embrace of an IP-based architecture, NG911 integrates a wide array of communication modes, including text, images, videos, and data, to enhance emergency response capabilities. It recognizes the evolving ways in which people can communicate during emergencies and aims to provide more efficient and effective emergency responses. This approach gives emergency responders a comprehensive picture of the situation, allowing for a more informed and effective response. For instance, in a scenario where a building is on fire, real-time video footage can provide firefighters with crucial information about the

intensity of the blaze, potential hazards, and the best entry points, all before they even arrive on the scene.

Furthermore, with the rise of smart devices and wearables, NG911's potential extends even further, enabling for instance a future where a wearable device detects a medical emergency, like a heart attack, and automatically sends vital signs and medical history to emergency responders, giving them a critical head start.

The transition to NG911 is a significant undertaking in rising to the demands of contemporary telecommunications. As mobile devices and IP-based telecommunications utilization escalates, the need for a resilient and sophisticated emergency response infrastructure becomes increasingly imperative.

To address this rapid modernization in the technologies that people use to call 911, the National Emergency Number Association, commonly known as NENA, periodically updates its i3 Standard for NG911. NENA is at the forefront of enhancing public safety and emergency communications in the United States and other countries. NENA collaborates with public safety agencies, telecommunications companies, government bodies, and technology providers to establish standards, best practices, and cutting-edge technologies that ensure swift and efficient response during emergencies.

The NG911 i3 standard¹⁰ is the “keystone” in NENA’s family of NG911 standards and facilitates end-to-end IP connectivity.¹¹ The i3 standard delineates protocols ensuring integration of both non-IP legacy wireline and wireless systems with the contemporary architecture. It introduces the concept of the Emergency Services Internet Protocol network (or ESInet, described in more detail below), an IP-based inter-network designed for collaborative utilization by all public safety entities, ensuring a cohesive and efficient emergency response mechanism.

¹⁰ The NENA i3 standard “provides the detailed functional and interface specifications for a post-transition IP (Internet Protocol)-based multimedia telecommunications system, including the Core Services and legacy gateways necessary to support delivery of emergency calls via an IP-based Emergency Services IP network.” NENA i3 Standard for Next Generation 9-1-1, National Emergency Number Association, https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/nena-sta-010.3d-2021_i3_stan.pdf (viewed October 11, 2023).

¹¹ “NENA Releases New Version of the i3 Standards for Next Generation 9-1-1”, National Emergency Number Association, <https://www.nena.org/news/572966/NENA-Releases-New-Version-of-the-i3-Standard-for-Next-Generation-9-1-1.htm> (viewed October 11, 2023).

As the NG911 landscape shifts towards a more integrated and sophisticated framework, the importance of precise spatial data becomes paramount. Geographic Information Systems (GIS) provides the necessary tools and methodologies to ensure that emergency response teams can pinpoint the exact location of a call. In the context of NG911, GIS supersedes the traditional Automatic Location Identification (ALI) database.

When transitioning to NG911, PSAPs are adopting ESInets, integrating FirstNet, and deploying NG911 capable Computer Aided Dispatch (CAD) software, among many other upgrades. ESInets, serve as the backbone for IP-based communication, enabling seamless data exchange between emergency services and enhancing information sharing across jurisdictions. The integration of FirstNet, the dedicated nationwide public safety wireless broadband network, bolsters connectivity and ensures priority access for emergency communications. Additionally, NG911 CAD software empowers dispatchers with advanced tools, including real-time data, multimedia support, and improved call routing, all of which are essential for providing more efficient and accurate emergency responses. These vital components, along with enhanced GIS data and redundant IP connectivity, adapt emergency services to the needs of an increasingly digital and interconnected world.

National Perspectives on NG911 Deployment

A group of national organizations help drive NG911 policy, each with unique roles in steering the evolution of NG911 technology, standards, and practices. These organizations, NENA, NASNA, and APCO, are influential in the dynamic landscape of emergency communication policy and implementation.

NENA, as an ANSI-accredited Standards Developer, focuses on crafting and endorsing NG911 standards through open development processes, setting the foundation for the entire NG911 framework. The National Association of State 911 Administrators (NASNA) represents state-level 911 leadership and plays a crucial role in coordinating and harmonizing NG911 efforts at the state level, ensuring seamless operations and alignment with national standards. Meanwhile, the Association of Public-Safety Communications Officials, International (APCO) is dedicated to enhancing public safety communications and interoperability, offering essential resources and advocacy to support professionals operating and maintaining emergency communication systems.

APCO has state chapters as well, including Kansas. Together, these organizations form an indispensable ecosystem driving the advancement of NG911 technology and policy.

These national associations are important sources of information and perspectives on NG911 deployment. Coordinating Council staff serve important leadership roles in these organizations which provides significant benefits to Kansas in operating and maintaining one of the leading NG911 deployments in the United States. Importantly Council member service in these leadership roles provide knowledge and insight into new features and their likely costs from vendors showing their new products and services at national association meetings. This knowledge directly informs the Council's budgeting and Business Case development. Thus, Kansas is a leader in the nation in the migration to ESInet with geospatial routing and i3 services. This provides most effective and efficient service to Kansas citizens and responders using state of the art technology.

Kansas reported that in 2021 data it received 122,234 wireline 911 calls, 1,434,853 wireless 911 calls, 133,614 VoIP 911 calls, and 8,410 SMS 911 calls¹². This shows not only the declining rate of incoming wireline 911 calls, but also the degree to which non-wireline calls are made. Indeed, more VoIP calls were made in 2021 than wireline 911 calls – further demonstration that Kansas' shift away from traditional 911 to NG911 is timely.

Across the United States, PSAPs are adopting NG911 at varying paces. Among these states, Kansas was one of only nine that had at least awarded contracts to deploy a NG911 Computer Aided Dispatch (CAD) solution¹³ as of the time of reporting in July 2022. Kansas was also early in installing, testing, or deploying NG911 Core Services and NG911 GIS services. At time of reporting, 26 states had not made any progress with NG911 Core Service and 21 states had not made any progress with NG911 GIS services.¹⁴

For Kansas, our survey found that three quarters of the PSAPs report that “Text-to-911” volumes are very little, while a further 22% report small but growing volumes. We note that in the FCC's Fourteenth 911 Annual Report, the Council reported receiving 8,410 text messages to 1,434,835 wireless calls (or one text message for every 170 calls), which may be compared to other states

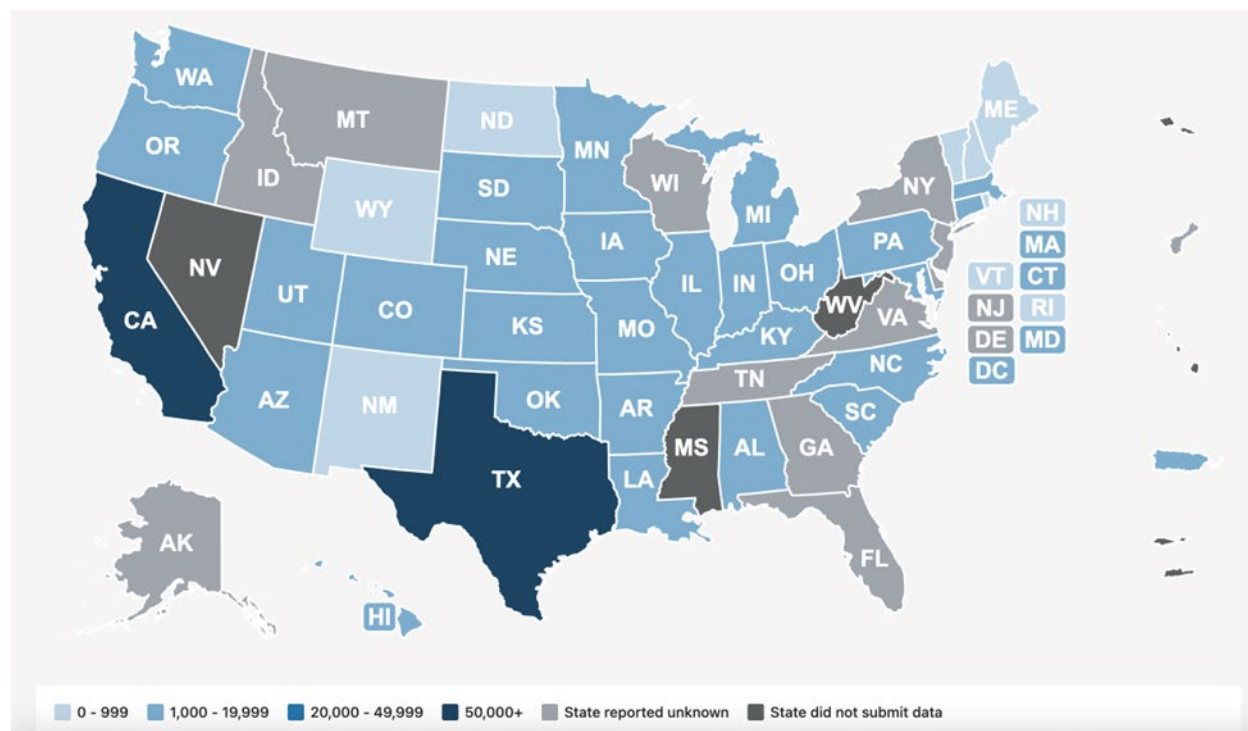
¹²Kansas Report to FCC on Annual Collection of Information Related to the Collection and Use of 911 and E911 Fees by States and Other Jurisdictions for the Fourteenth 911 Annual Fee Report for Calendar Year 2021, page 22. Kansas FCC 911 Fee Report, page 4.

¹³ National 911 program. *National 911 Annual Report, 2021 Data*, at page 44. (“2021 911 Annual Report”)

¹⁴ *Ibid*, at page 43.

receiving a similar number of text messages: Illinois (9,319 texts received compared to 8,304,001 wireless calls, or one text message for every 891 calls); Arizona (6,881 texts received compared to 4,822,657 wireless calls, or one text message for every 701 calls); and Oregon (7,872 texts received compared to 2,204,309 wireless calls, or one text message for every 280 calls).

The figure below the number of text messages sent to 911 nationwide.¹⁵



911 SAVES Act

The Office of Management and Budget maintains a classification system for occupations that is used for statistical purposes. Public safety telecommunicators are currently classified by OMB’s Standard Occupational Classification as administrative/clerical. This is viewed as inaccurate and a disservice in the public safety community. The 911 SAVES Act¹⁶ has been introduced to

¹⁵ <https://www.911.gov/issues/911-stats-and-data/>

¹⁶ Supporting Accurate Views of Emergency Services Act of 2021, H.R. 2351 <https://www.congress.gov/117/bills/hr2351/BILLS-117hr2351ih.pdf> (viewed October 23, 2023).

remedy this and classify public safety telecommunicators in the “protective service occupations” which recognizes the work performed by public safety telecommunicators – such as coaching callers through CPR, dealing with active shooters – is inherently protective.

Federal/Spectrum Auction Funding for NG911

Policy makers seek to implement a comprehensive NG911 system that replaces old 911 communications technology, is interoperable across the country and based on strong cyber protections. It is important to avoid “have” and “have-not” 911 jurisdictions that impede interoperability and cybersecurity protections. These are some of the reasons Congress requested a feasibility estimate of costs to implement NG911 so it could consider long term funding mechanisms. The 911 Implementation Coordination Office (jointly administered by the National Highway Traffic Safety Administration/NHTSA and the National Telecommunications and Information Administration/NTIA, in consultation with the Federal Communications Commission, and the Department of Homeland Security) submitted a report to Congress in October 2018 which estimated the cost of a nationwide NG911 deployment would be between \$9.5 billion and \$12.7 billion.¹⁷ Last year the Public Safety Next Generation 911 Coalition updated that estimate to \$15 billion to account for cost increases and increased spending on cybersecurity.¹⁸

Informed by these cost estimates, the House Energy and Commerce Committee in May 2023 passed the Spectrum Auction Reauthorization Act¹⁹ to reauthorize the FCC’s authority to conduct spectrum auctions²⁰ for three years. Part of the proceeds from the spectrum auctions would provide \$14.8 billion to fund the next-generation 911 (NG911) platform across the

¹⁷ Next Generation 911 Cost Estimate: A Report to Congress, October 2018, submitted by the National Highway Traffic Safety Administration and the National Telecommunications and Information Administration.

¹⁸ “Next Generation 9-1-1 Fact Sheet”, <https://ng-911coalition.org/next-generation-9-1-1-fact-or-fiction/>

¹⁹ “H.R. 3565 — 118th Congress: Spectrum Auction Reauthorization Act of 2023.” www.GovTrack.us. 2023. <https://www.govtrack.us/congress/bills/118/hr3565> (viewed October 19, 2023)

²⁰ The Federal Communications Commission administers and manages the country’s electromagnetic radio spectrum which is used for wireless and broadcast services. Since 1994 the FCC has conducted spectrum auctions to grant licenses and permits for its use. These auctions have numerous benefits including earning substantial funds from qualified bidders who win the auction for various slices of the spectrum. Congress allocates the auction proceeds in the budget such as in the recent House Energy and Commerce Committee legislation which allocates \$14.8 billion in auction proceeds to fund grants to states for NG911.

country, a proportionate amount of which would be available for further Kansas NG911 deployment.

The FCC Role in NG911 Deployment

Since completion of the previous Audit in 2018²¹, efforts at the federal and state levels to modernize and enhance the 911 emergency system in the United States have focused on leveraging technological advancements to improve the system's efficiency, accessibility, and resilience.

Legislation like Ray Baum's Act and Kari's Law have laid the groundwork for more sophisticated emergency response capabilities, including the provision of "dispatchable location" information and enabling direct 911 dialing from multi-line telephone systems.

The FCC is an independent, bipartisan Federal agency that oversees the nation's telecommunications policy. In acting to implement laws passed by Congress, such as Ray Baum's Act and Kari's Law, the FCC exercises its regulatory authority over the nation's telecommunications infrastructure. The FCC formulates its regulations by vote of its five Commissioners. Commission decisions shape the guidelines and standards for various telecommunications initiatives, including the transition to NG911.

While the FCC has been notably proactive in addressing 911 issues, especially in the realm of telecommunications infrastructure and policy, the FCC's authority primarily revolves around the telecommunications aspect of 911 services, ensuring that the necessary infrastructure, standards, and protocols are in place for efficient and accessible emergency communication. When it comes to the direct oversight of Public Safety Answering Points (PSAPs) themselves, regulatory jurisdiction falls under the Department of Justice (DOJ). The DOJ ensures that PSAPs adhere to federal laws and regulations, particularly those related to accessibility and non-discrimination, ensuring that all individuals, regardless of their abilities or circumstances, have equal access to emergency services. This delineation of responsibilities underscores the collaborative nature of

²¹ Audit of the Kansas 911 System on Behalf of the Legislative Division of Post Audit, December 2018. ("2018 Performance Audit of Kansas 911 System").

federal oversight, with multiple agencies working in tandem to ensure the efficacy, reliability, and inclusivity of the nation's 911 system.

The regulations set forth by the FCC aim to ensure that NG911 is not only efficient and reliable but also universally accessible to every citizen as technology and communication methods evolve, and that the emergency response system remains robust and responsive to the needs of the public. The following timeline provides an overview of key regulatory changes since 2018 that have impacted 911 services.

- 2018: Ray Baum's Act – This act includes provisions for improving the nation's public safety communications and emergency calling features. It also required the FCC to consider adopting rules to ensure that "dispatchable location" information is conveyed to the PSAP with 911 calls, regardless of the technological platform used (MLTS, VoIP, wireless, etc.). "Dispatchable location" is stated by APCO to be "well understood by public safety communications professionals to mean information sufficient for guiding first responders to the right door to kick down." The FCC implemented regulations in 2019 under Ray Baum's Act to define "dispatchable location" flexibly to allow for variation in "sufficient" information depending on the environment from which a 911 call originates given the diverse and evolving of the MLTS market and breadth of business enterprise environments.²²
- 2019: Kari's Law – This law requires multi-line telephone systems ("MLTS") to enable direct dialing of 911 without requiring any additional digit or prefix. This law aimed to make it easier for individuals in hotels, campuses, and other multi-line systems to reach emergency services. The FCC implemented regulations in 2019 under Kari's Law to ensure that 911 calls from hotels, campuses and other multi-line telephone systems can be originated without the necessity of dialing a prefix first, such as "9" or "1" to get outside the MLTS.²³
- The FCC emphasizes the importance of providing accessible emergency communications, and to that end has also encouraged the adoption of Text-to-911

²² *Implementing Kari's Law and Section 506 of RAY BAUM's Act*, Report and Order, PS Docket No. 18-261, FCC 19-76 (August 1, 2019), at page 50. (*Order Implementing Kari's Law*)

²³ *Id.*

services, making emergency services, and more recently, the adoption of Real-time Text²⁴, to make more accessible to individuals with speech or hearing impairments.

- 2021: 911 Fee Diversion Report and Order – the Federal Communications Commission was directed by Congress²⁵ to help address the diversion of 911 fees by states and other jurisdictions for purposes unrelated to 911. Under this direction the FCC adopted rules which define acceptable obligations and expenditures of 911 fees as those being to support and implement 911 services provided by a state or jurisdiction as well as operational expenses of PSAPs.²⁶ Recipients of federal grants are obliged to report information the FCC specifies on its data collection form for the annual 911 Fee Report. Jurisdictions spending 911 funds on unacceptable purposes are designated as fee diverters in the annual 911 Fee Report. Designation as a “fee diverter” may impair availability of federal grant funds including those administered by the National Telecommunications and Information Administration (NTIA) and the National Highway Traffic Safety Administration (NHTSA). These rules went into effect on October 18, 2021. The Kansas NG911 System is insulated from risk of being designated as a “fee diverter” and potentially being ineligible for federal grants by the 911 Act’s placement of the Council’s funds outside the state treasury.
- 2023: FCC Notice of Proposed Rulemaking (NPRM) on the Implementation of NG911 Services – As explained below, in this NPRM, the FCC proposes new rules and regulations to advance the nationwide transition to NG911.

²⁴ *In the Matter of Implementing Kari’s Law and Section 506 of RAY BAUM’S Act, Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems, Amending the Definition of Interconnected VoIP Service in Section 9.3 of the Commission’s Rule.* Report and Order, PS Docket No. 18-261, PS Docket No. 17-239, GN Docket No. 11-117 (August 2, 2019): “Access to 911 services. CMRS providers subject to this section must be capable of transmitting 911 calls from individuals with speech or hearing disabilities through means other than mobile radio handsets, e.g., through the use of Text Telephone Devices (TTY). CMRS providers that provide voice communications over IP facilities are not required to support 911 access via TTYs if they provide 911 access via real-time text (RTT) communications....”

²⁵ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, Division FF, Title IX, Section 902, Don’t Break Up the T-Band Act of 2020 (section 902).

²⁶ *911 Fee Diversion and New and Emerging Technologies 911 Improvement Act of 2008*, Report and Order, PS Docket No. 20-291 and PS Docket No. 09-14, FCC 21-80 (June 25, 2021, at paragraph 31. (*Fee Diversion Order*).

Federal Communications Commission Notice of Proposed Rulemaking

A significant shift in the regulatory landscape occurred in June 2023 when the FCC adopted its IP Network Transition Notice of Proposed Rulemaking (NPRM) with new rules and deadlines to drive the implementation and nationwide transition to NG911.²⁷ The FCC's proposed rules aim to accelerate the replacement of the copper circuit-switched architecture of legacy 911 networks with IP-based technologies, improving NG911 system interoperability with devices used today to call 911.

The NPRM outlines requirements for service providers to deliver 911 calls in an IP-based format and proposes cost allocation mechanisms to facilitate this transition. Accelerating the rollout of NG911 not only streamlines emergency response capabilities but also opens the door for future innovations and greater accessibility of 911 generally.

Unlike the current 911 system which uses circuit switched networks and TDM transmission technology, NG911 uses Internet Protocol (IP)-based format and routing which is intended to support the transmission of text, photos, videos, and data. The national 911/public safety community avers to the FCC that uncertainties and disputes are impeding the NG911 network transition at a national level. (Notably, this is not said to be the case in Kansas.) The FCC seeks to resolve these uncertainties and disputes between telecommunications service providers and state 911 authorities on the transition to IP-based networks by adopting new rules which provide deadlines and requirements for wireline telephone companies, wireless providers, interconnected Voice over IP providers, and telecommunications relay service providers to deliver 911 calls in IP-based format to the Emergency Services IP network or ESINet. Delivery of calls is proposed to be required once the 911 authority has certified its ability to accept IP-based 911 calls. The deadline is within six months of the effective date of the FCC's requirement or from a valid request by the 911 authority, whichever is later. These deadlines and requirements are the same as the existing requirement for wireless providers.

²⁷ *Facilitating Implementation of Next Generation 911 Services (NG911)*, Notice of Proposed Rulemaking, PS Docket No. 21-479, FCC 23-47 (June 8, 2023). (*IP Network Transition NPRM*)

Furthermore, the proposed rule would require the service providers to deliver all 911 calls to a demarcation point on the network selected by the 911 authority, which will likely be different than the point in the network where 911 calls are delivered today.

Finally, there are costs to telecommunications service providers involved to modify the network to deliver 911 calls in IP format to a different demarcation point in the network. The proposed rule makes the telecommunications service provider responsible for the costs of reconfiguring the network routing of 911 calls under the new FCC rule in the absence of different cost allocation arrangements between the 911 authority and the telecommunications providers.

The FCC has received comments from interested parties on its proposed rules and it is not known when the FCC will make a final decision in this matter. However, on September 7, 2023, the FCC was brought to full strength with Senate confirmation of Anna Gomez as a commissioner. Given the now-full complement of five commissioners, the FCC's final decision may come relatively quickly.

Telecommunications companies in Kansas and elsewhere are very concerned that the FCC proposes to place the cost burden on the telephone companies especially when the costs of connecting rural telephone exchanges to the NG911 platform can be disproportionately high. We sought estimates of what these costs could total in the state of Kansas but no such estimates have been performed or provided to date. Kansas' contractor for the NG911 solution – AT&T – requires that each telecommunications company transport all its 911 calls to two out of state locations (to Dallas TX and Fairfield CA) which will necessitate two separate interstate circuits. Absent a different alternative, each telecommunications company in Kansas would be required to provision and furnish these two interstate circuits which would clearly be very costly. The Coordinating Council is in ongoing discussions with telecommunications companies in Kansas to assess alternatives, as the FCC formalizes the deadlines in its rules and regulations.

When the FCC proposed rule to drive the implementation and nationwide transition to NG911 is adopted and becomes effective, the availability of fully implemented IP-based NG911 in Kansas will become critical to ensure that all calls are handled with the high standards Kansas has set for itself. The Coordinating Council will be able to plan for deployment of additional i3 features and capabilities with greater certainty on timing and implementation schedule for these features, such as Real Time Text (RTT), which in turn will allow the Coordinating Council and PSAPs to

plan communications campaigns to drive awareness about the availability of accessible ways to call 911. Public awareness campaigns play a pivotal role in ensuring that individuals with disabilities are informed about 911 communication options available to them, enabling them to effectively reach out during emergencies. As communication technologies continue to evolve, keeping the public informed about effective and currently available ways to contact emergency services becomes even more critical.

Planning for future i3 features that are not required by FCC rulemaking should fall into the “beneficial” or “nice to have” budgeting category. They can then be evaluated and prioritized based on Kansas-specific needs and wants.

In addition to expedited nationwide NG 911 deployment, the IP Network Transition NPRM, once approved, will enable more options for direct access to 911 by those who are deaf or hard of hearing, enhancing the ability of telecommunicators to make timely and accurate dispatches to persons who are deaf or hard of hearing. This will significantly improve the dispatch time and accuracy for persons who are deaf or hearing impaired, as the use of telecommunications relay services with 911 causes delays in calling 911 as a relay operator must first be reached before the actual 911 call can be initiated, presenting a possibly dangerous delay in reaching emergency services.

Because of its early adoption of IP-based technology, statewide establishment of ESInets, and forward-thinking planning in adopting a hosted NG911 solution, Kansas is positioned well to quickly implement new NG911 features as they become available from vendors, such as Real-time Text, which is expected to be supported by Motorola in its next revision of the VESTA hosted platform in the first half of 2024.

Kansas has set a high standard in modernizing emergency response systems, creating a positive model for others to follow. However, the journey towards excellence is ongoing, and staying abreast of the latest regulatory changes is crucial for maintaining a leadership position.

988 Suicide and Crisis Lifeline

The 988 dialing prefix traces back to a series of regulatory and legislative actions aimed at enhancing the accessibility and efficiency of mental health emergency services. The National

Suicide Hotline Improvement Act of 2018²⁸ mandated the FCC, in consultation with the Department of Health and Human Services and the Department of Veterans Affairs, to examine the feasibility of designating a three-digit dialing code for this purpose.

In 2019, the Federal Communications Commission (FCC) initiated a comprehensive review of the existing emergency dialing infrastructure. This was prompted by the increasing recognition of the need for a dedicated crisis hotline, particularly for mental health emergencies. Upon thorough analysis of potential dialing codes and their implications on the existing telecommunication framework, the FCC staff identified the 988 prefix as the most viable option. This choice was influenced by the minimal disruption it would cause to the current numbering system and its ease of recall for the general public.

In 2020, the FCC adopted rules²⁹ to establish 988 as the nationwide, easy-to-remember 3-digit dialing code for people in crisis to connect with suicide prevention and mental health crisis counselors. As a result, covered telecommunications service providers in the United States and the five major U.S. territories—American Samoa, Guam, Northern Mariana Islands, Puerto Rico, and U.S. Virgin Islands— were required to direct all 988 calls and texts to the Lifeline by July 2022. In 2022 NENA adopted a Suicide/Crisis Line Interoperability Standard³⁰ which describes how suicide/crisis lines should interact with PSAPs.

[W]hen a person at imminent risk contacts a crisis line and is in need of urgent intervention by first responders, crisis lines rely upon PSAPs to locate the person and get help dispatched to them -- something that crisis lines lack the capability to do independently.

PSAPs and crisis lines should also consider collaborations outside of emergency intervention/active rescue. PSAPs may request additional trainings from crisis lines to determine how/when PSAPs may transfer non-emergency callers to the crisis line, to

²⁸ National Suicide Hotline Improvement Act of 2018, Pub. L. No. 115-233, 132 Stat. 2424 (2018) (Suicide Hotline Improvement Act).

²⁹ *Implementation of the National Suicide Hotline Improvement Act of 2018*, Report and Order, WC Docket No. 18-336, FCC 20-100 (July 16, 2020) (*Suicide Prevention Hotline Notice of Proposed Rulemaking or Notice*).

³⁰ NENA Suicide/Crisis Line Interoperability Standard; NENA-STA-001.2-2022, March 4, 2022.

<https://988lifeline.org/wp-content/uploads/2022/04/NENA-Suicide-Crisis-Line-Interoperability-Standard-Published-March-2022.pdf> (viewed October 25, 2023).

enhance customer service. **It is also recommended that PSAPs and crisis lines collaborate with local health and mental health authorities in communicating to local practitioners, agencies, and the public at large as to when it is most appropriate to call 9-1-1.**³¹

The 988 Suicide and Crisis Lifeline is a national network of more than 200 crisis centers which provides 24/7, confidential support to people in suicidal crisis or mental health-related distress. These centers are supported by local and state sources as well as the Department of Health and Human Services' Substance Abuse and Mental Health Services Administration (SAMHSA).

988 in Kansas

In Kansas, 988 calls are routed to the National Suicide Prevention Hotline, which is privately run and not a part of the Kansas 911 system. Kansas Department for Aging and Disability Services (KDADS) is responsible for 988 support and deployment in Kansas. There are 3 primary 988 Crisis Lifeline centers in Kansas: one each located in Sedgwick, Douglas, and Johnson Counties. Between August 2022 and July 2023, an average of 1,674 calls were received each month through 988 in Kansas, alongside an average of 762 texts and chats received each month.³²

The Kansas 988 contact centers are independently operated and receive additional state funding and oversight from KDADS and the 988 Coordinating Council, which has been established separately to advise KDADS. Earlier this year, after signing Senate Bill 19, a bipartisan bill to fund the statewide suicide prevention hotline 988, Governor Laura Kelly announced her appointments to the 988 Coordinating Council. The 17-member council consists of 11 voting members and six non-voting members. The Council will advise KDADS on the utilization of funding for the 988 Suicide and Crisis Lifeline and 988-related services like mobile crisis and crisis stabilization. The Council began meeting on December 20, 2022, and will sunset on June 30, 2026. KDADS provides support and facilitates meetings of the Council.

³¹ Standard, page 2, **Emphasis added.**

³² *One Year Later: A Closer Look at the 988 Lifeline in Kansas.* Kansas Health Institute, September 07, 2023.

In October 2023 KDADS received a total of \$5.4 million over three years from the US Department of Health and Human Services' SAMHSA program to improve suicide and crisis hotline capacity.³³ Some eligible uses for the money include increasing workers for the hotline, improving knowledge of 988 services and expanding post-contact support.

In our interviews we explored stakeholder views on the utilization and implementation of 988 in Kansas. Stakeholders see inconsistencies in how 988 is being deployed and confusion on why it has been deployed the way it has prior to having standards and rules identified.

Survey responses indicated several PSAPs surveyed said they wanted more training on handling suicide calls. Data indicates that 2% of calls³⁴ to 988 require transfer to 911. While technology options will evolve, none are currently in place for 988 telecommunicators to transfer calls to 911. An FAQ sheet could be maintained for all PSAP's outlining current 988 status and identifying best 988 practices.

Although the 988 Lifeline is not part of NG911, the 911 Coordinating Council Staff has provided its 911 expertise and best practices to support the 988 efforts in Kansas. Kansas NG911 is sharing best practices with KDADS and SAMSHA to develop the best standards for the phased approach and for Kansas leadership. However, no funding is provided by the 911 Coordinating Council.

There are several technical issues in addition to policy, privacy and dispatch matters surrounding 988. Today, 988 does not use the same GIS information 911 uses to locate callers.³⁵ 988 uses the public switched telephone network for routing of calls with a translation, based on the area code of the caller, to turn 988 into a 10-digit PSTN telephone number. 988 receives no location information at all. 988 is limited to caller ID information based on its use of the PSTN. The majority of 988 calls do not require a dispatch – instead the caller is seeking counseling, not a

³³ "Statehouse Briefs: Kansas to Receive \$5.4M to Improve Suicide Hotline Capacity".

https://stateaffairs.com/pro/kansas/flash/statehouse-briefs-suicide-hotline/?utm_source=email&utm_medium=newsletter&utm_campaign=ks-flash (viewed October 20, 2023).

³⁴ The National Council for Mental Wellbeing. "988 and 911: Similarities and Differences." ("One key area of overlap between 911 and 988 occurs when there is an imminent risk to the 988 user's life (an ongoing suicide attempt, for example). While the 988 coordinated response is intended to promote stabilization and care in the least restrictive manner, in the case of imminent danger, 988 calls are connected to emergency services like 911. Currently, fewer than 2% of Lifeline calls require this connection.")

³⁵ Unfortunately, there is a misconception that since "both prefixes begin with "9" means 988 and 911 calls are routed the same way" – they are not.

dispatch for emergency services. Further, many callers want to remain anonymous, creating a liability issue that must be addressed. The area code routing issue, standards and liability are all matters currently being discussed for resolution by SAMSHA and KDADS.

Americans with Disabilities Act and Transition from TTY to Real Time Text (RTT)

The Americans with Disabilities Act (ADA), Public Law 101-336, enacted on July 26, 1990, required among other things that 911 become accessible for individuals unable to use the telephone, stipulating that all Public Safety Answering Points (PSAPs) are required to provide direct access to citizens who use Teletypewriters (TTYs³⁶) and computer modems.³⁷ This federal law requires PSAPs to offer a level of service to individuals with disabilities equivalent to that provided to all other citizens. It prohibits the direct reliance on telecommunications relay services or third-party providers in place of providing direct access to 911, though PSAPs must accept incoming 911 calls placed using telecommunications relay services.³⁸

However, TTYs are no longer commonly used by Deaf and hard of hearing people, and new TTYs are no longer available for purchase in the marketplace, making the DOJ's guidance outdated. Technologies to exchange text messages have improved and the limitations of TTY technology, such as garbled messages during bidirectional communication, are absent in these newer technologies.

In 2016, recognizing the need for a more modern solution, AT&T petitioned the Federal Communications Commission for the recognition of RTT in their accessibility rules as an alternative to outdated TTY technology.³⁹ In its petition, AT&T stated that it was not possible to support TTY communications on IP networks and asked the FCC to act "in order to recognize RTT as the equivalent to and a replacement for TTY technology for newly deployed IP-based

³⁶ Also referred to as telecommunications devices for the deaf (TDDs).

³⁷ 28 C.F.R. 35.162

³⁸ U.S. Department of Justice. Americans with Disabilities Act Title II Technical Assistance Manual, section II-7.3000 Emergency telephone services; II-7.3100 General: "*Direct access* means that emergency telephone services can directly receive calls from TDD's and computer modem users without relying on outside relay services or third-party services."

³⁹ Petition of AT&T Services, Inc. for Rulemaking, PS Docket Nos. 11-153, 10-255, WC Docket No. 04-36, CG Docket Nos. 03-123, 10-213 (filed June 12, 2015)

voice devices and services” by determining that “providing RTT functionality is an appropriate method of complying with the Commission’s rules governing TTY access.” The FCC later granted their petition and issued initial rules to support the transition from TTY to Real-time Text technology.⁴⁰

Unlike the analog constraints of TTY, where communication is limited to one party at a time at a rate of up to 80 words per minute, RTT offers instantaneous text transmission as characters are typed, mirroring the immediacy of voice communication. This real-time feature is particularly beneficial for individuals with speech or hearing impairments, enabling more fluid communication with PSAP telecommunicators. The combined use of text and voice offers a versatile interaction, crucial in emergencies where, for instance, a caller might need to remain silent but can still convey vital information through text. It also enables features such as Hearing Carryover (HCO) and Voice Carryover (VCO).⁴¹

In alignment with this technological shift, the National Emergency Number Association (NENA) has been proactive in integrating RTT into its i3 architecture for Next Generation 911 and publishing an RTT implementation guide tailored for Public Safety Answering Points (PSAPs), giving Kansas a comprehensive set of resources from which to draw in guiding its implementation of RTT.

With support for RTT already provided by smartphone manufacturers, wireless carriers, and AT&T’s ESInet, the last remaining portion of the call path today that requires an upgrade to support end-to-end RTT calls for 911 in Kansas is VESTA.

The state's adoption of a statewide NG911 solution has paved the way for Kansas PSAPs to embrace RTT with minimal delay once RTT support is delivered for VESTA in the first half of 2024, with VESTA version 8.0. When that is completed and rolled out to Kansas PSAPs, end-to-end RTT calls to 911 will become possible in Kansas. Additional work by PSAPs to prepare

⁴⁰ *Transition from TTY to Real-Time Text Technology; Petition for Rulemaking to Update the Commission's Rules for Access to Support the Transition from TTY to Real-Time Text Technology, and Petition for Waiver of Rules Requiring Support of TTY Technology*, CG Docket No. 16-145 and GN Docket No. 15-178, 2016. (“RTT Order”)

⁴¹ HCO is a telecommunications service that assists individuals who are deaf or hard of hearing in making phone calls by allowing them to listen to the telecommunicator’s voice while providing their responses via text. VCO is a similar service but is used by individuals with speech disabilities, enabling them to speak while reading responses from the telecommunicator displayed as text.

for the rollout beyond the upgrade to the upcoming upgrade to VESTA adding RTT support will include updating PSAP standard operating procedures and training telecommunicators to use RTT, among other things.⁴²

With the upgrade to VESTA, Kansas PSAPs will be able to begin training their telecommunications personnel to receive and respond to RTT calls, ensuring that the benefits of RTT are made available to all, including those in the Deaf and hard of hearing community. When PSAPs have completed the necessary measures to begin receiving RTT, they may submit requests to wireless carriers for the delivery of RTT. In its RTT Order, the FCC mandated that wireless carriers must deliver RTT 911 calls to Public Safety Answering Points (PSAPs) within six months of PSAPs requesting so.⁴³

The Kansas 911 Act's Creation of the 911 Coordinating Council

The Coordinating Council is the successor to the Wireless Enhanced 911 Advisory Board which was created in 2004 to assist and advise the Secretary of Administration in administering the proceeds of the statewide wireless 911 fee deposited in the Wireless Enhanced 911 Grant Fund and providing grants to PSAPs.⁴⁴ The issue at that time was to handle the transition to and implementation of “Phase II” call handling for wireless 911 calls to individual PSAPs pursuant to Federal Communications Commission direction. Wireless calls to 911 originally did not provide any caller information to the PSAP attendant, unlike landline calls using E911. Phase I was designed to add the caller’s phone number and latitude and longitude coordinates, and street address of the cell tower site to the data associated with the wireless call received at the PSAP, while Phase II automatically passed on location information based on latitude and longitude coordinates with the wireless call to the PSAP.⁴⁵ The Grant Fund was designed to address

⁴² NENA PSAP Readiness for Real-Time Text (RTT) Information Document

⁴³ *Ibid.*

⁴⁴ L. 2004, Ch. 72, Section 6.

⁴⁵ Some call handling CPE provides for automatic rebid, but it is a separate process that must be performed after a call is connected to the call taker.

complex, costly technologies to determine the location of a wireless call to 911 that many PSAPs could not afford.

The Wireless Enhanced 911 Advisory Board was replaced by the 911 Coordinating Council effective January 1, 2012 with the passage of the Kansas 911 Act. The Act abolished the wireless enhanced 911 advisory board and distributed the unobligated balance (\$15 million) of the wireless enhanced 911 grant fund to the LCPA for deposit into the newly created 911 State Grant Fund,⁴⁶ for administration by the newly created Council. The Council plans to maintain this \$15 million balance as a management reserve under provisions of the Act.⁴⁷

The Council's membership was changed and expanded⁴⁸ by amendments of the Act in 2019, as follows:

- A definition of “non-traditional PSAP” was added to include Public Safety Answering Points which are not operated by cities or counties, but are operated by universities, tribal governments, and state and federal government entities. The non-voting membership of the Coordinating Council was amended to add two members representing non-traditional PSAPs.
- The voting members of the Coordinating Council was amended to add a member representing the Kansas chapter of the Association of Public Safety Communications Officials while eliminating the member representing PSAPs regardless of size.

On May 1, 2023, Sheriff Troy Briggs was appointed by the Governor as Chairman of the Council. Under Sheriff Briggs the Council is reviewing and updating policies and practices of the Council in concert with anticipated evolution of the NG911 system.⁴⁹ It deserves emphasis that Council members are *volunteers* who are public safety and local and state government professionals serving jurisdictions across the state. Their service to the state of Kansas on the Council is truly commendable.

⁴⁶ L. 2011, Ch. 84, Section 21.

⁴⁷ K.S.A. 12-5368(b)(2).

⁴⁸ Present membership of the Council is shown on Appendix A.

⁴⁹ The terms “NG911 system” and “Statewide Hosted Call Handling System” are used interchangeably in this Report.

Further information on the Council’s history and the 911 Act is provided in the Council’s most recent Legislative Report and Council Member Handbook used to provide information for Council members regarding the NG911 Call Handling System.

Fees and Funds Established by the Kansas 911 Act

The Fees

The Kansas 911 Act imposes “a 911 fee in the amount of \$.90 per month per subscriber account of any exchange telecommunication service, wireless telecommunications service, VoIP service, or other service capable of contacting a PSAP.”⁵⁰ The Council is permitted to lower the 911 fee upon a finding that funds generated by the fee are in excess of the costs required to operate PSAPs in the state.⁵¹ The Kansas Legislature authorized the Council to increase the fee to \$0.90 in 2019. The Act also imposes a duty on “each exchange telecommunications service provider, wireless telecommunications service provider, VoIP service provider and other service provider to remit such fees to the LCPA”.⁵² The 911 Fee may be (and typically is) collected by telephone service providers (“TSP”) from their customers. These collected fees are then remitted by the TSPs monthly to the LCPA.

The Act also imposes a fee on prepaid wireless retail transactions as a percentage of those transactions (“prepaid wireless fee”, currently 2.06%). Prepaid wireless service is defined as “a wireless telecommunications service that allows a caller to dial 911 to access the 911 system, which service must be paid for in advance and is sold in predetermined units or dollars of which the number declines with use in a known amount.”⁵³ Prepaid wireless fees are collected by the Kansas Department of Revenue and remitted monthly to the LCPA.

As shown by the FCC’s Fourteenth Annual 911 Fee Report⁵⁴ the Kansas fees are at the low end of the range of state 911 fees and below the average of states reporting their fees.

⁵⁰ K.S.A. 12-5369.

⁵¹ K.S.A. 12-5364(g).

⁵² K.S.A. 12-5369.

⁵³ K.S.A. 12-5363(m).

⁵⁴ Fourteenth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges; submitted pursuant to Public Law No. 110-283, by the Federal Communications Commission, December

Table 13 – 911 Fee Highlights by Service Type⁸⁶

Service Type	Average 911 Fee	State with Lowest Average Associated Fee (per line per month)	State with Highest Average Associated Fee (per line per month)	States/Jurisdictions with No Response or Associated Service Fee ⁸⁷
Wireline – Flat Fee	\$1.03	Arizona \$0.20	West Virginia ⁸⁸ \$3.36	American Samoa, Missouri, Nevada, Ohio
Wireless – Flat Fee	\$1.05	Arizona \$0.20	West Virginia \$3.47	American Samoa, Missouri, Nevada, Wisconsin
Prepaid Wireless – Flat Fee per Retail Transaction	\$0.94	California \$0.30	Alabama \$1.86	Alaska, American Samoa, Hawaii, Nevada, New Jersey, U.S. Virgin Islands, Wisconsin
Prepaid Wireless – Percentage of Retail Transaction	3.04%	Ohio 0.5%	Arkansas 10.00%	
VoIP – Flat Fee	\$1.03	Arizona \$0.20	West Virginia \$3.36	Alaska, American Samoa, Guam, Missouri, Montana, Nevada, Ohio, U.S. Virgin Islands, Wisconsin

Notably, many states allow their fee to be used to pay telecommunicator wages and salaries. See Table 10 of the FCC’s Fourteenth Annual 911 Fee Report, which shows that 34 states allow 911 fees to be used to pay PSAP personnel costs.

The 2019 amendments of the Act among other things create the Operations Fund and direct \$0.23 of the fee to the Operations Fund for deployment, maintenance and upgrades of the Statewide NG911 system, and \$0.01 of the fee to the State Grant Fund if its balance falls below \$2 million.

30, 2022. 911 Fee Reports and Reporting, <https://www.fcc.gov/general/911-fee-reports> (“Fourteenth Annual FCC 911 Fee Report”).

911 State Fund

This Fund was created by the Act and is not part of the State Treasury.⁵⁵ This Fund covers payments to PSAPs statewide to support their implementation of the NG-911 platform and other eligible expenditures as provided by K.S.A. 12-5375, which identifies the “approved uses” of proceeds of the 911 fees. The fund’s funding source is the remainder of the 911 fee collected from service providers, after distribution of \$0.23 from each fee to the Operations Fund, and \$0.01 to the State Grant Fund, and interest earned on the fund. 911 State Funds are distributed to the PSAPs with a minimum per county distribution of \$60,000. Proportional allocation is used for counties with more than one PSAP. Distribution of collected 911 fee moneys by the LCPA occurs according to the following distribution formula:

- Counties with Population over 80,000 - 82% of funds generated in those counties are distributed to PSAPs within those counties
- Counties with Population 65,000 to 79,999 – 85%
- Counties with Population 55,000 to 64,999 – 88%
- Counties with Population 45,000 to 54,999 – 91%
- Counties with Population 35,000 to 44,999 – 94%
- Counties with Population 25,000 to 34,999 – 97%
- Counties with Population less than 25,000 – 100%⁵⁶

Funds remaining after these distributions are transferred to the 911 Operations fund.

Appendix B shows the Council’s Income Statement for this Fund for the most recent full period available (2022).

911 Operations Fund

This Fund was created in the 2019 legislation to separately fund the administrative costs of the 911 Coordinating Council and the deployment and maintenance of the statewide Hosted Call Handling system.⁵⁷ It is funded by the LCPA’s distribution of \$0.23 of every 911 fee to the Operations Fund. This fund pays for Council administrative, meeting and travel expenses, Council conference registrations and travel, Council Committee meeting expenses, Council

⁵⁵ K.S.A. 12-5368(a).

⁵⁶ K.S.A. 12-5374(a)(1).

⁵⁷ The terms “NG911 system” and “Statewide Hosted Call Handling System” are used interchangeably in this Report.

staffing and LCPA contracts, statewide Hosted Call Handling System platform contract costs (procured from AT&T), and other contractual costs including GIS and Portal services from DASC, legal representation, website, Learning Management System and security audits.

Appendix C shows the Council's Income Statement for this Fund for the most recent full period available (2022) which include the Council's administrative costs, AT&T service contracts, and other contractual expenditures including the LCPA and contracted personnel.

911 State Grant Fund

This fund was created by the Act for grants to individual PSAPs and is not part of the State Treasury.⁵⁸ The Council has had a policy restricting this for grants for "emergency purposes" for PSAPs. Now that the present State Grant Fund balance is approximately \$1.4 million the Council is considering how it might provide grants for more than "emergency purposes".

The primary funding source for the 911 State Grant Fund is \$0.01 from every fee collected. Additionally, funds derived from the \$0.23 deposited to the 911 Operations Fund in excess of 15% of total receipts over the prior 3 years are remitted to the State Grant Fund. If the balance of the State Grant Fund exceeds \$2 million, then the \$.01 ceases to be withheld from the 911 fees. The Council has charged the Expenditure Review Committee to begin administration of the state grant fund. "Emergency Purposes" will cease to be the threshold as the fund now nears the \$2m mark. It should be noted that it has taken since 2019 to build the fund. What carryover balance is appropriate versus income will likely be a full Council decision.

911 Federal Grant Fund

There are currently no federal grant funds in the Council's account. Federal grants are almost exclusively reimbursement grants, so this account is unlikely to be used under that approach. However, significant NG911 grant funding may become available from federal funds particularly from spectrum auction proceeds administered by the FCC in which case a block of funds might be available for future NG911 deployment. In any case expenditures from this fund are to be determined by grant guidelines.

⁵⁸ K.S.A. 12-5368(a).

State 911 Maintenance Fund

The Act provides for a state maintenance fund, established in the state treasury.⁵⁹ The fund may contain funds appropriated by the legislature, interest from investment of funds, and public or private donations for purposes of the fund. The funds may be used for grants “to eligible municipalities only for necessary and reasonable costs incurred or to be incurred by PSAPs for: (A) Implementation of enhanced 911 service and next generation 911 service, as defined in K.S.A. 2017 Supp. 12-5363, and amendments thereto; (B) purchase of equipment and upgrades and modification to equipment used solely to process the data elements of enhanced 911 service and next generation 911 service, as defined in K.S.A. 2019 Supp. 12-5363, and amendments thereto; and (C) maintenance and license fees for such equipment and training of personnel to operate such equipment, including costs of training PSAP personnel to provide effective service to all users of the emergency telephone system who have communications disabilities. Such costs shall not include expenditures to lease, construct, expand, acquire, remodel, renovate, repair, furnish or make improvements to buildings or similar facilities or for other capital outlay or equipment not expressly authorized by this act.”

No such State 911 Maintenance funds exist at present. Thus, grant funding is not presently available for “training PSAP personnel to provide effective service to all users of the emergency telephone system who have communications disabilities” which is an important gap in the present environment of technology change especially give the requirements of the FCC’s NPRM and the minimum training requirements stated in APCO/NENA ANS 3.105.1-2015 *Minimum Training Standard for TTY/TDD Use in the Public Safety Communications Center* and the *State of Kansas 911 Training Standards* prepared by the Kansas 911 Coordinating Council.

According to the FCC’s Fourteenth 911 Annual Report, 32 states have mechanisms for ensuring that minimum training requirements are met. Sixteen states, including Kansas, do not.

⁵⁹ K.S.A. 12-5366.

The Local Collection Point Administrator (LCPA)

The Local Collection Point Administrator is defined as “the person designated by the 911 coordinating council ... to collect and distribute 911 fees and 911 state grant fund moneys.”⁶⁰ The Act states that “The 911 coordinating council, by an affirmative vote of nine voting members, shall select the local collection point administrator”. The Coordinating Council is required to obtain the approval of the legislative coordinating council if the LCPA is to be changed.⁶¹ The statute also states that the LCPA contract for services shall be no longer than two years, which contract can be extended for an additional two years.

The current LCPA is **Non-Profit Solutions** (or “NSI”, of Emporia Kansas) which assumed the duties of the LCPA on January 1, 2017, and continues under contract which expires at the end of 2024. The LCPA performs many functions for the Council under this contract including administering financial processes, providing support for Council meetings, providing support for PSAPs and service providers, and website administration. The financial processes administered by the LCPA are many:

- Maintaining the chart of accounts for Council fund accounting
- Managing the Council’s funds and financial reporting
- Managing investment of funds per the Council’s Investment Policy
- Managing telecommunications provider payments and contacts
- Distributing funds to PSAPs under the statutory formula
- Maintaining accounts payable and vendor payment processes, including network infrastructure
- Managing Council and staff reimbursement processes as well as contractor payments
- Supporting annual CPA audits and Legislative Post Audits

NSI uses the Kansas 911 Coordinating Council Web Portal developed by DASC for remittance information from TSPs monthly. The 911 fees are collected via Electronic Funds Transfer or paper check from each service provider, along with spreadsheet information identifying the PSAP jurisdiction from which the funds were collected to support appropriate fee distribution to PSAPs.

⁶⁰ K.S.A. 12-5363(h).

⁶¹ K.S.A. 12-5367.

2019 Amendment of the Kansas 911 Act

In the 2019 Session the Kansas Legislature substantially amended the Kansas 911 Act to add or modify numerous provisions. Many of the amendments were consistent with the 2018 Audit Report.

- The definition of NG911 was amended to include conformance with National Emergency Number Association (“NENA”) i3 standards⁶².
- Definitions were added for “GIS”, geographic information systems, which are an essential part of NG911. Added GIS provisions give the Council authority to establish regulations to set GIS standards and data maintenance requirements, allow the Council to ensure that PSAPs certify GIS data remains up to date, and to provide cost recovery for the Council if it must step in to bring the GIS data into compliance with data standards.
- The Act was amended to increase the 911 fees from \$0.60 per month to \$0.90 per month, while the prepaid wireless fee was increased from 1.2 percent to 2.06 per cent per transaction.
- The Act is amended to direct \$0.23 from every 911 fee be directed to the 911 Operations fund for deployment, maintenance and upgrades of the statewide NG911 system, and withholding of \$0.01 from every 911 fee for deposit in the 911 State Grant Fund if its balance falls below \$2 million. If funds from the \$0.23 for the Operations Fund exceed 15% of total receipts from the 911 fees the excess is to be directed to the 911 State Grant Fund for PSAP grants based on demonstrated need. The Act is further amended to require prepaid wireless funds in excess of \$3.0 million to be distributed to counties proportional to population.
- Provisions for distribution to PSAPs are amended to increase the minimum county distribution from \$50,000 to \$60,000.

⁶² The NENA i3 standard “provides the detailed functional and interface specifications for a post-transition IP (Internet Protocol)-based multimedia telecommunications system, including the Core Services and legacy gateways necessary to support delivery of emergency calls via an IP-based Emergency Services IP network.” NENA i3 Standard for Next Generation 9-1-1, National Emergency Number Association, https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/nena-sta-010.3d-2021_i3_stan.pdf (viewed October 11, 2023).

- The definition of Local Collection Point Administrator was amended to mean the person selected by the 911 Coordinating Council to collect and distribute 911 fees and 911 state grant moneys and created the 911 Operations Fund outside the State Treasury. LCPA related expenses are required to be reimbursed from the 911 Operations Fund. The Act was amended to require approval from the Legislative Coordinating Council for selection of the LCPA.
- Membership of the Council was changed and expanded as noted above.
- The Act was amended to require reimbursement of Council-related expenses from the newly created Operations Fund rather than the previous State Grant Fund. Payments for administrative expenses are limited to 2 percent of total receipts from telecommunications providers and the Kansas Department of Revenue's collections from prepaid wireless services.
- The Council is authorized to reimburse state agencies or independent contractors from the newly created Operations Fund for expenses incurred under the Act.
- Council authority to promulgate rules and regulations is expanded to include establishment of training standards and programs related to the NG911 statewide hosted solution, data standards, maintenance policies, and data reporting requirement for GIS data along with civil penalties upon finding a provider has violated any provision of the Act. However, the Council may not impose any mandatory certification program of PSAP operations or PSAP emergency communications staff.
- The Act was amended regarding PSAP expenditures of 911 fee funds.
 - The Council is given authority to withhold 10% of 911 payments to PSAPs which fail to timely file its annual report and supporting documentation on expenditures, until such time as the PSAP submits their report and/or documentation, then the withheld money is paid out to the PSAP.
 - Existing Council practices for expenditure review and expenditure pre-approval is codified and the Council is to appoint an Expenditure Review Committee.
- The Act is amended to limit liability of the part of the LCPA, PSAPs or 911 system operators and their respective employees except for action or inaction that constitutes gross negligence or willful and wanton misconduct.

Kansas NG911 Technology

Legacy 911 systems are based on older copper telephone network technologies using Time-Division Multiplexing (TDM)-based architectures. This technology is voice-operable only, analog, and limited in its abilities to transfer emergency assistance requests and receive, process, and share multimedia data formats. By comparison IP-based NG911 systems can receive and process any type of communication that is digital (e.g., texts, photos, video, multimedia). Thus, the Kansas 911 Act defines “Next Generation 911” as “911 service that conforms with national emergency number association (NENA) i3 standards and enables PSAPs to receive Enhanced 911 service calls and emergency calls from Internet Protocol (IP) based technologies and applications that may include text messaging, image, video and data information from callers.”⁶³ The Legislative and public safety community foresight to pursue statewide NG911 via the Kansas 911 Act, along with the hard work and dedication of the 911 Coordinating Council and its staff, has resulted in a statewide, fully subscribed, NG911 platform which is the envy of other states.

Kansas has set a high standard in modernizing emergency response systems, creating a positive model for others to follow. However, the journey towards excellence is ongoing, and staying abreast of the latest regulatory changes is crucial for maintaining a leadership position.

⁶³ K.S.A. 12-5363(j).

The Emergency Services IP Network (ESInet) Concept

NENA defines⁶⁴ the ESInet as:

a managed IP network that is used for emergency services communications, and which can be shared by all public safety agencies. It provides the IP transport infrastructure upon which independent application platforms and core functional processes can be deployed, including, but not restricted to, those necessary for providing NG-911 services. ESInets may be constructed from a mix of dedicated and shared facilities. ESInets may be interconnected at local, regional, state, federal, national, and international levels to form IP-based inter-network (network of networks). The term ESInet designates the network, not the services that ride on the network.

ESInets play a pivotal role in NG911 systems, as they standardize communication between Public Safety Answering Points (PSAPs), emergency service providers, and various data sources. These IP networks are engineered for redundancy and resilience, ensuring that emergency calls can be reliably delivered even in the face of network failures or high call volumes.

ESInets enable geographic call routing, allowing emergency calls to be directed to the appropriate PSAP based on the caller's location, regardless of jurisdictional boundaries. This capability enhances response times and accuracy, critical factors in emergency situations.

ESInets represent a fundamental shift in how emergency calls are processed and routed in 911, ushering in a new era of efficiency, interoperability, and enhanced public safety communications.

⁶⁴ NENA Knowledge Base, "ESInet (Emergency Services IP Network)", [https://kb.nena.org/wiki/ESInet_\(Emergency_Services_IP_Network\)](https://kb.nena.org/wiki/ESInet_(Emergency_Services_IP_Network)) (viewed October 13, 2023).

Status of 911 Implementation

Statutory Charge

The Act states “... the division of post audit shall conduct an audit of the 911 system to determine ... the status of 911 service implementation”.⁶⁵ Under the Act, the Council is charged with the objectives to “monitor the delivery of 911 services, develop strategies for future enhancements to the 911 system and distribute available grant funds to PSAPs.”⁶⁶ The scope of our audit is to determinate “the status of migration to NG911 as of July 1, 2023. As part of the evaluation, the contractor will interview 911 Coordinating Council members to determine the status of the state-hosted NG911 platform and the timetable for implementing the various features of the NG911 system, such as text-to-911, texting while roaming, location identification, multi-media messaging, geospatial call routing, translation services, and other i3 services.”

The Council’s Mission: To serve Kansas PSAPs by implementing a coordinated, sustainable, and comprehensive NG911 service that responds anytime, anywhere, from any device to realize the full potential for 9-1-1 to provide public access to emergency services.

The Kansas 911 Call Handling Platform

When one looks backward it is seen that the dedicated Council members, Council committees, and Council staff accomplished a truly extraordinary amount of work since the Council’s inception in 2012 to create and build the statewide NG911 platform.⁶⁷ The fact that Council members are dedicated volunteers makes the Council’s achievements even more extraordinary. Milestones:

⁶⁵ K.S.A. 12-5377(c).

⁶⁶ K.S.A. 12-5364(a)(1).

⁶⁷ The following discussion is drawn from the Coordinating Council’s website, its 2022 Legislative Report, the Council Member Handbook, and the Council’s Strategic Plan, as well as interviews conducted by BCS with NG911 stakeholders statewide.

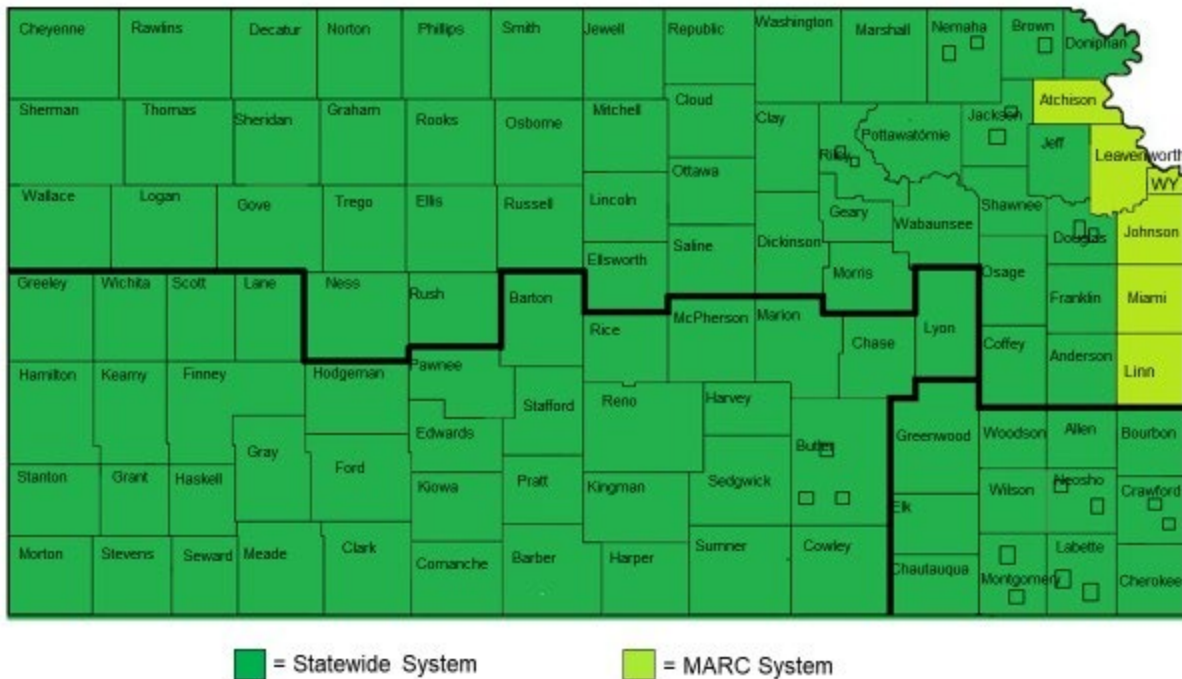
- The first step of achieving accurate up to date GIS data aligned with the NG911 data standard was achieved in 2014. Current, **accurate GIS data is mandatory** for the geospatial call routing that is foundational to NG911. Geospatial call routing sends the 911 call to the appropriate PSAP to deliver the emergency response to the caller based on the location of the caller. Kansas is fortunate to have a national leader in collecting, organizing, maintaining and updating Geographic Information System data – the Data Access and Support Center (DASC) at the University of Kansas. DASC undertook the task of enhancing statewide GIS data to be in alignment with the NG911 data standard. Since that time DASC has done a superb job of managing data remediation and quarterly data updates by all local GIS entities such that DASC has 100% participation by all entities in Kansas in the quarterly data update process. This level of participation is nearly unheard of, and thus Kansas’s NG911 GIS data remains in alignment with the NG911 standard.
- During this time DASC also undertook alignment of existing E-911 data (telephone number records and Master Street Address Guide) with the GIS data.
- Concluded procurement process and contracted with AT&T to create the statewide hosted call handling NG911 platform and Emergency Services IP Network. The first ten PSAPs were connected to the Kansas NG911 system in 2015.
- SMS-to-911 function goes live in 2017.
- All PSAPs are migrated to ESInet by 2019.
- Migration of all PSAPs on the Kansas NG911 system to i3 geospatial routing is completed in 2020.
- Kansas adheres to the National Institute of Standards and Technology *Framework for Improving Critical Infrastructure Cybersecurity* (April 2018)⁶⁸ for the network supporting PSAPs in Kansas.
- As shown below, migration of all Kansas PSAPs (outside the MARC region, described below) to the Kansas NG911 platform was completed in October 2023 – all Kansas PSAPs (except those in the MARC region) are connected and served by the Statewide Hosted Call

⁶⁸ Kansas Report to FCC on Annual Collection of Information Related to the Collection and Use of 911 and E911 Fees by States and Other Jurisdictions for the Fourteenth 911 Annual Fee Report for Calendar Year 2021, page 21. (“Kansas FCC 911 Fee Report”).

Handling System. There are 117 primary PSAPs⁶⁹ in Kansas, of which 109 are connected to the Statewide Hosted Call Handling System.

- Migration of PSAP connections from Virtual Private Network (VPN) to AT&T Switched Ethernet (ASE), which provides flexible bandwidth to support transmission of voice, video and data between PSAPs and the Hosted Statewide Call Handling System, and thus support robust functionality for i3 features and capabilities. Since ASE circuits are more economical the Council has been able to add a commercial broadband connection at every PSAP as a redundant means of connectivity to the Statewide Hosted Call Handling System. The additional commercial connection provides another level of redundancy to keep PSAPs connected if their primary circuit goes down. FirstNet LTE is now a tertiary backup for this purpose.

Statewide Hosted Call Handling System



⁶⁹ Kansas FCC 911 Fee Report, at page 2.

The Mid-America Regional Council

The Mid-America Regional Council (MARC) is a nonprofit association of city and county governments in Kansas and Missouri for the metro Kansas City region. MARC is a planning organization for metro Kansas City which performs several functions including development of regional plans for emergency response and providing cooperative services between local governments.

MARC is made up of nine counties (Leavenworth, Wyandotte, Johnson and Miami in Kansas, and Platte, Clay, Ray, Jackson, and Cass in Missouri) in the Kansas City metropolitan area including 119 separate city governments.⁷⁰ Kansas counties electing to participate in the MARC Regional 911 emergency communications system transition to NG911 are Atchinson, Johnson, Leavenworth, Miami, Linn, and Wyandotte. These counties plus four counties in Missouri have signed a 911 Interlocal Cooperation Agreement to commit to a region-wide modernization of 911 equipment, per capita sharing of costs of this system, and oversight of management of the regional system by a policy and coordinating committee.⁷¹ The MARC system has completed replacement of legacy selective routers with IP Selective routers and a planned migration to NGCS and i3 routing is underway. A part of that migration plan will include interconnection with the statewide ESInet.⁷²

As part of our Council member interview process, we interviewed the non-voting member designated by the Act to represent the MARC region. We gained a high-level overview and understanding of the MARC regional 911 system from that interview and from review of the MARC website. As the MARC regional 911 system and the Kansas NG911 statewide platform evolve it will be crucial that the Council and MARC work together to ensure compatibility and interoperability can be achieved through the two systems. Our review indicates this cooperation is working well, and the Act directly supports this necessary cooperation and coordination via the inclusion of a Council member representing MARC.

⁷⁰ About the Mid-America Regional Council, <https://marc.org/about-mid-america-regional-council> (viewed October 12, 2023).

⁷¹ Regional 911 System, <https://marc.org/safety-security/public-safety-communications/regional-911-system> (viewed October 12, 2023).

⁷² Kansas FCC 911 Report, page 19.

The Role of AT&T in Deployment of the Kansas NG911 System

The Installation and deployment of the Kansas 911 Call Handling Platform began under the Statement of Work executed by the Council with AT&T on April 13, 2015, under which AT&T Public Safety Solutions is to provide the State of Kansas with a Hosted Next Generation 911 Call Handling Solution. Implementation of the Kansas 911 Call Handling Platform has required significant Council and staff travel for testing and coordination with individual PSAPs statewide from then until October 2023 with the addition of the last PSAPs outside the MARC region to the system.

AT&T has been the single prime contract service provider for the State of Kansas NG911 System. This has allowed the Kansas NG911 Council and Staff to deploy the latest NG911 technology statewide in a standardized and ubiquitous manner without the added staff, cost and effort of managing multiple vendors.

We reviewed numerous contractual documents reviewed in the audit. Not all contracts are coterminous, however the majority go through the budgeting cycle through 2027.

These contracts show the technical evolutionary path Kansas NG911 has followed since 2015. Over the years, Kansas NG911 has migrated from VPN/TDM networks to ESInet – an IP based network that allows for future enhanced services other than traditional voice services.

Some of the new features and services added to the Kansas NG911 System are SMS-to-911 (soon to be upgraded to Real Time Text or RTT), ECaTS (Emergency Call Tracking System) for better performance monitoring, Rapid Deploy Responder (or “Lightning” app, which delivers 911 call data to first responder’s mobile devices), a third geographically dispersed host (VESTA) for improved redundancy and most recently, plans to migrate to AT&T’s ASE network for dynamic bandwidth.

All primary contracts with AT&T have been recently renewed (2022/2023). The AT&T NG911 Infrastructure contract is the main contractual vehicle. It was amended December 10, 2021 and runs through September 14, 2027. This contract covered the migration from TDM to ESInet with

increased port speed, a third fully redundant host, migration to ASE (switched ethernet service) technical field support and program management support.⁷³

A 3-month contract extension for AT&T Service Management services was recently executed by AT&T and the Council. This extension will expire 12/15/2023 and it was renewed in the Council's October 27, 2023 meeting.

Other contracts recently executed by the NG911 Council are the Intrado contract for cybersecurity services, signed September 5, 2023 and the LCPA contract with Non-Profit Solutions. The Non-Profit Solutions contract is set to expire December 31, 2024.

Stakeholder Interviews and PSAP Survey

During the engagement, we conducted extensive interviews with Council members, Council staff, and stakeholders in the Council's work. Stakeholder views and information from the PSAP survey were crucial to our understanding and assessment of the status of the NG911 System, PSAP expenditures, and the adequacy of funding for the NG911 System. The Council members are in volunteer service to the Coordinating Council, and we greatly appreciate their willingness to spend time with us to discuss important matters concerning maintaining Kansas leadership in NG911 deployment and current Kansas platform issues and futures.

NG911 Emergency Communications is a very complex subject so multiple subjects were explored in our discussions including funding adequacy, the performance of the NG911 platform, potential FCC deadlines for connecting telecommunications providers, the expenditure review process, staffing and budget issues faced by PSAPs, experience with NG911 and desired new features, Text to 911, Real Time Text, and other specific new features enabled by i3, training considerations, Council communications, and every other matter the stakeholder wished to discuss. The views and information gained in these discussions inform our discussion and recommendations throughout this Report.

⁷³ Further information on AT&T NG911 products may be found at: <https://www.business.att.com/categories/next-generation-911.html>

PSAP Survey Results

Input from the Public Safety Answering Points is crucial for this Audit and Report. We created a survey distributed to all Kansas PSAPs through the Council's 911 Portal to assess the State's NG911 system capabilities and standard operating procedures. Two version of the Survey were created for the audit – one tailored to PSAPs that have opted to use the state platform, the other for the PSAPs in the six Kansas counties (Atchinson, Leavenworth, Wyandotte, Johnson, Miami and Linn) which have Interlocal Cooperation Agreements with MARC. Six PSAPs in the MARC region completed the survey while 54 PSAPs on the Statewide Hosted Call Handling System completed the survey. The information provided by survey respondents is very useful to the Council and for our Report and we are grateful for the time spent by respondents completing the surveys.

The Survey is attached as Appendix D. Findings are summarized below by subject area.

Downtime

Half the PSAPs on the Statewide Hosted Call Handling System indicated they had experienced some downtime at their PSAP. The downtime is characterized for the most part as “very rare”, “brief”, “rare”, “infrequent”, “during storms”, “a couple of times, not common, usually short lived”, or “minimal”. The preponderance of times appear to be network issues from fiber optic cable cuts, and some issues were attributed to programming issues and Vesta connections. Respondents generally indicated the Statewide Hosted Call Handling System backup/rerouting operated efficiently and as designed during the downtime.

The Council distinguishes between individual PSAP “downtime” and system outages. The Council's Technical Committee defines an outage as resulting from a single problem that affects three or more PSAPs. There has not been a single outage of the NG911 System since the 2018 Audit Report although there was a large service interruption in Sedgwick County in July 2021 resulting from an equipment failure during fiber optic cable maintenance.

Recently a large fiber trunk was cut near DeSoto Kansas which affected four PSAPs: Ness, Russell, Osborne and Cloud counties. The impact was limited to administrative lines in Cloud County – 911 service was not lost. Redundancy and failover design worked for Russell and Ness counties who failed over to LTE mobile wireless until the fiber cut could be repaired and did not

lose 911 service. Osborne County had to be rerouted because the LTE mobile wireless connection was not stable.⁷⁴

However, on October 25, 2023 service was affected in Stafford, Brown, Sedgwick, Cowley and McPherson counties beginning with circuit issues. The preliminary report was that an AT&T technician used an incorrect procedure several times, contrary to documented procedures, with the result that 911 call delivery was out during the day for minutes in duration. Further investigation is continuing, and the Council expressed its view that technicians cannot improvise against established procedures and further that the root cause analysis must be public and not restricted from disclosure to the public.

Staffing and Training

47% of responding Kansas PSAPs characterize their current staffing as “fully staffed”, 48% characterize their staffing level as “75%”, while the remainder are “50% staffed or less”. PSAPs were asked if they might be interested in participating in a trial or pilot program using trained work-at-home PSAP telecommunicators to potentially support achievement and maintenance of adequate PSAP staffing – assuming key conditions such as security and network considerations could be worked out. Nearly 50% said “no”, but the remaining 50% responded “yes” or “maybe”. The potential for “work from home” augmentation of the PSAP work force is further discussed below.

85% of Kansas PSAPs have adopted and implemented Standard Operating Procedures for processing silent, open-line calls, and non-responsive emergency requests for assistance. One aspect of these guidelines would be for the telecommunicator to interrogate the line for a possible TDD/TTY/SMS/Real Time Text call, which in turn is important for the deaf and hard of hearing community. Nearly 40% of Kansas PSAPs responding have developed and incorporated methods of transferring these calls to EMD, fire, or police, while 57% have not.

40% of Kansas PSAPs responding have developed and implemented public awareness programs to notify people using TDD/TTY/SMS/RTT Text about the ways the PSAP can provide direct access, while 47% have not, and 13% are unsure. One comment requested more TTY training.

⁷⁴ August 25, 2023 Council minutes, at page 19.

PSAPs were asked what NG911 training resources they anticipate using for their telecommunicators and the responses were robust, providing widely varying feedback when asked what training resources they would like to see the Council provide for their telecommunicators. Mental Health training including suicidal callers was mentioned several times (“Active shooter and suicidal callers”, “how to handle suicide callers”. This is notable given implementation of the 988 Suicide Prevention and Crisis Lifeline. The specific requested training resources were divided between those that fall within the Council’s training scope under the Act versus those that are outside the Act’s scope for Council-provided training.

Specific comments which the Council believes to be “in scope” for it to provide under the Act include:

- Continued use of the NextGen 911 Portal and possibly an in-person class for new hires.
- More training on how to process TTY calls.
- Going into detail and even how to transfer calls from the main screen.
- Make training a little more in depth (harder), and maybe call enactments the dispatchers would have to perform during the online training
- Continued training on Rapid Deploy mapping refresher courses
- More practical use maybe a training mode
- Continued training and improvement on the Vesta
- Coordinating Council training resources
- They have been providing everything need for our phone system
- Best tips and tricks that the software does but users might not be aware.
- More in depth vesta training
- What is new? What has changed with the 911 systems in the last year.
- Training mode for practice
- Provided technology

Comments which the Council believes to be either more general in nature or outside the scope for it to provide under the Act include:

- More real event training, example how to handle real calls.

- Anything you can make available to us is extremely helpful. The learning platform is great, but remembering to log in is difficult.
- On site demos
- I like the variety of training the Coordinating Council has been putting on the LMS. I would like to see more of it.
- Continued training on call taking
- More Medical Training to keep our EMD certification, “more EMS things”
- Interaction with employees
- Perhaps more CTO trainings available
- an actual video, not a web chat with bad audio
- interoperability
- "radio communications"
- I believe they cover training in every area
- Any training that is regional.
- Online training that can be accessed at any time, day or night.
- Tactics and technical training related to call taking and dispatching.
- I would like to have a third-party vendor such as PLS included.
- more admin training
- Training new hires in today's World. The struggle of the new generation.
- More call taking training
- Keep it to NG911 training
- Continuing resources of up-and-coming services
- Problem solving and mitigation.

These responses suggest that the position of NG911 Trainer would be beneficial and high priority. The NG911 would help develop a new curriculum suited to the NG911 system’s operational status, so that all elements of the system are included in regional training and then deliver training based on that curriculum, rotating among regions. Ongoing training is essential due to new i3 applications, and also important for many new PSAP employees given the high turnover rate among PSAP telecommunicators. The regional training could be delivered in conjunction with the EMDTC.

One commentor exemplifies the views expressed by others in the survey: “Talk of a Communications Training Academy for new dispatchers should be made a priority.” An initiative has been underway for some time outside of the Council to form a basic academy for Communicators. The Communicators Academy would be hosted at the Kansas Law Enforcement Training Center (KLETC). The initiative is intended to teach both basic call equipment usage within the Council’s scope and additional Communicator skills needed by professional Communicators but not directly related to the Statewide Hosted Call Handling System. The further intent is to provide a more consistent, cost-effective continuing education resource that is readily accessible both in Hutchinson and KLETC satellite locations. Accordingly, some Council members see the development of training through KLETC by their professional staff and subject matter experts as an appropriate and cost effective utilization of Council 911 funds.

Praise and Suggestions for Change or Improvement

The survey responses contained a number of additional statements:

- I think Kansas 911 is amazing! I love watching it grow from even where it was 9 years ago when I started to now. The improvements are amazing, and it keeps going in the right direction. I am very excited to be a part of this field.
- headed in right direction. keep up the good work
- Keep up the good work
- I feel as if our Coordinating Council is doing a phenomenal job and have great ideas and doing great keeping us moving forward in the technology World - sometimes I wish they'd slow down so we can keep up with other things and getting everyone trained while the training continues on other aspects of our jobs. Well done, KS911!
- Great system

One respondent requested “Less Surveys”. We understand and realize many PSAPs feel “over-surveyed” but for this Audit we believe it to be essential to conduct one more survey, every five years.

i3 Capabilities

The survey asked PSAPs to pick from a list those i3 features, capabilities and services they would like to see supported by the Kansas NG911 system, as well as those features, capabilities

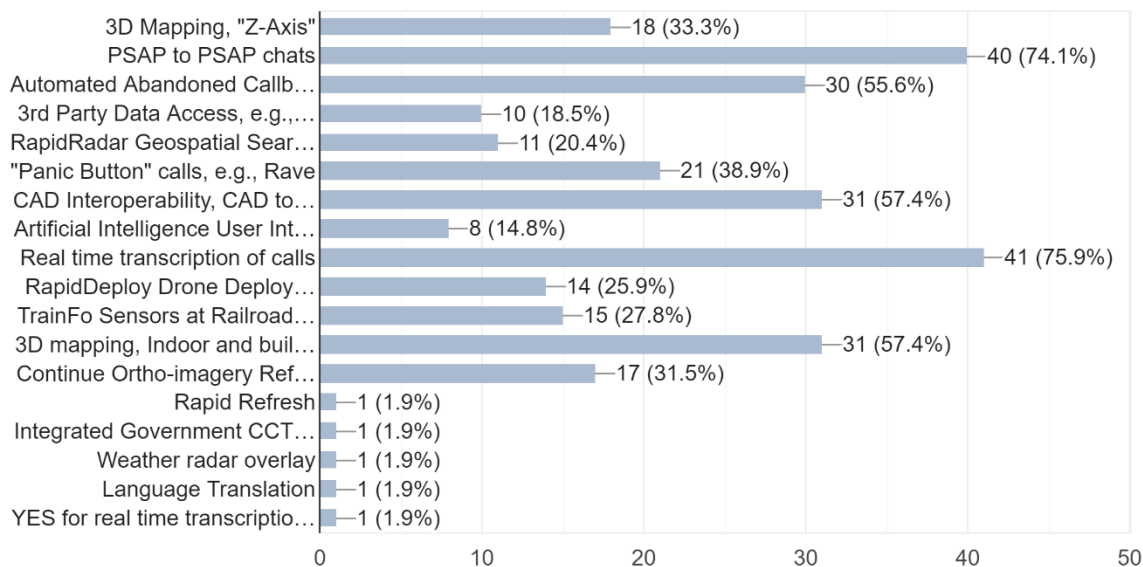
and services they thought would be most useful for their PSAP. The list was generated from i3 features, capabilities and services being considered by the Council for implementation in the Business Case. Survey respondents' most desired features, capabilities and services directly correspond with those planned in the Council's Business Case. These features listed in descending order are:

- Real time transcription of calls
- PSAP to PSAP chat
- 3D mapping, indoor and building footprint
- Computer Aided Dispatch systems interoperability, CAD to CAD data sharing
- Automated Abandoned Callback
- Panic Button Calls
- 3D Mapping, "Z" (vertical) axis information displayed to call taker
- TRAINFO⁷⁵ sensors at railroad crossings (this information also could come through the Lightning app, and KDOT also has great interest in this. Pilot to trial the system is being considered for Shawnee, Douglas and Harvey counties)
- Continuation of Ortho-imagery refresh for GIS every three years
- RapidDeploy Drone Deployment

⁷⁵ TRAINFO uses sensors to collect real time and predictive rail crossing blockage data which is useful for emergency dispatchers who can receive real time rail crossing blockage alerts allowing dispatch to reroute emergency vehicles around blocked crossings and avoid dispatching first responders that will be delayed by blocked rail crossings. TRAINFO: Reduce First Responder Delay. <https://trainfo.ca/solutions/reduce-first-responder-delay/> (viewed October 19, 2023)

What i3 capabilities, features and services would you like to see supported by the Kansas NG911 platform?

54 responses



PSAPs were also asked what capabilities, services and features enabled by i3 would be most useful for the PSAP. Many identified Automated Abandoned Callback, PSAP to PSAP chats, 3D mapping, CAD to CAD interoperability and data sharing, and real time transcription of calls.

The PSAP interest in CAD-to-CAD interoperability and data sharing while the Council has decided to support roll out of the Lightning app which performs a very similar function illustrates the importance of Council communications with PSAPs. There is an important training and communication element to inform PSAPs of how the Lightning app can provide CAD to CAD interoperability without the technical headaches of essentially daisy chaining individual PSAP CAD systems. A component of the Lightning app rollout could include an explanation of how it could be a more effective implementation of CAD-to-CAD interoperability and listening to PSAP response to that explanation. Training and communication need to be provided on how this new application may address the PSAP interest in CAD-to-CAD interoperability.

This survey information was provided to the Council and Council staff for their use in updating the strategic plan and Business Case financial projections. The availability of these features and

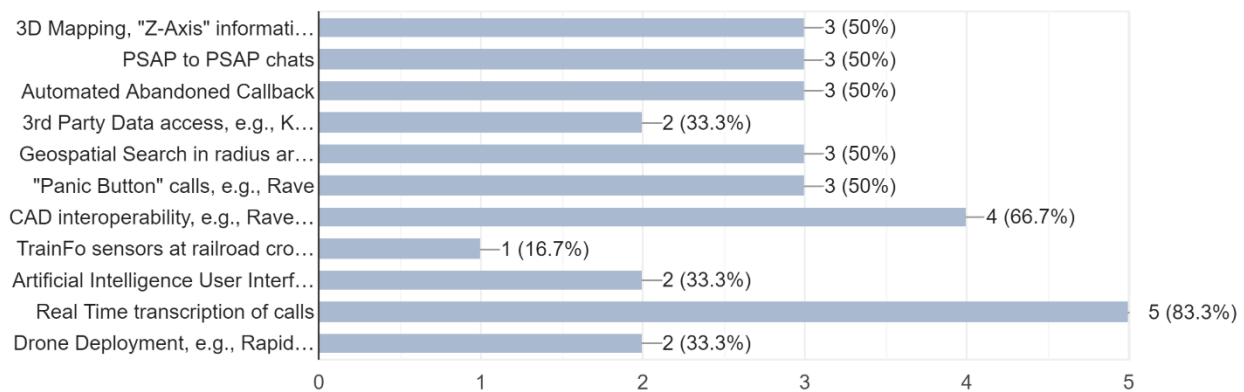
capabilities is ultimately determined by when the vendors deploy them. Furthermore, the Council is keenly aware the implementation of new features and capabilities needs to be spaced out over time to allow for adequate assimilation and training by the PSAPs. Finally, it should be noted that “TRAINFO” at present is very expensive for broad deployment in Kansas since the state is crossed with so many railroads and has so many crossings. KDOT is very interested in this system and is exploring pilot trials in Shawnee, Dougla and Harvey counties. Especially at the beginning TRAINFO deployment would likely have to be case by case.

Findings from MARC Region PSAPs

Six PSAPs from the MARC Region responded to the survey, which primarily sought information on desired i3 features and capabilities desired by the MARC PSAPs. The additional features and capabilities believed to be most useful were real time transcription of calls, geospatial routing and CAD to CAD data sharing, and automated abandoned callback.

What i3 capabilities, features and services would you like to see available via NG911 platform?

6 responses



Kansas NG911 Roadmap for i3 Futures

The Council includes estimated costs for deployment of new i3 features and capabilities in the financial projections within its Business Case (below, under “Adequacy of Funding”). The Council staff is an active participant in the state and national 911 associations, especially NENA, NASNA and APCO. Council staff gathers technical and cost information in many ways including taking leadership roles on association committees, regular communication with vendors at the

national level and sponsorship of biannual “Infrastructure Workshop” for presentation of vendor information and plans regarding new features. The leadership role of the Council and its staff put it in an excellent position to stay abreast of emerging technologies and features. This knowledge is used to inform PSAPs on upcoming potential features and to plan for these features and their budgetary impact.

We included the list of i3 features and capabilities the Council staff has developed using this process included in the Business Case projections in our PSAP Survey (described above). Survey respondents prioritized the i3 features and capabilities they would like to see deployed which information is useful to the Council and staff for deployment planning and financial projections, as well as communications with vendors. The staff has categorized the features and capabilities into three categories: mandatory, essential, and beneficial, which in turn aids budgeting and financial projections. Council staff has considered the PSAP input from the surveys in categorizing and prioritizing i3 feature and capability deployments in the Business Case. It will also be important for the Council to balance the number and timing of new features and capabilities that are deployed against what PSAP management/staff and Council staff can integrate into training and operations.

Cost of i3 Futures

Each one of these i3 future capabilities and features comes at a cost from the Council’s NG911 vendor (AT&T) and subcontractors (including Motorola and RapidDeploy). One of the reasons Kansas has become a leader in NG911 was its decision to go with a sole source provider, AT&T. A sole source provider enables ubiquitous deployment of integrated technology and training as well as the capability to back-up other PSAP’s or to support consolidation of PSAP’s. States with multiple vendors often struggle with disparate systems, finger pointing when problems arise and increased staffing expense to oversee and manage multiple products/technologies/contracts.

AT&T and Council Staff have enjoyed a close and mutually beneficial working relationship from the initial procurement. AT&T looks at Kansas as its flagship state to introduce new technologies and use as a reference point for future sales efforts for its new applications and services. AT&T benefits from using Kansas as a statewide platform to prove and create its

business case for new service offerings like the Lightning Application. Kansas benefits from leading-edge technology and support at potentially lower costs.

While this has proven to be a symbiotic relationship, cost control for future years is a concern. Because of the close business relationships between AT&T and staff, the existing staff has been successful at negotiating fair costs from AT&T. However, when the contract term expires, or existing staff have turned over or retired, it may become very difficult to move away from the incumbent provider, even if that is the desire of the Council. For all of the reasons that made a sole provider the best solution for Kansas NG911, it also introduces complexities for how to best manage future costs or switch to another provider.

Council/Staff discussions on these matters should focus on AT&T cost control and staff succession planning. The existing relationships appear to be working well today. That can always change quickly and having an action plan on these matters now is highly recommended.

Emergency Mobile Deployment and Training Center (EMDTC)

A new Emergency Mobile Dispatch and Training Center (EMDTC) vehicle is being built to assist with disaster readiness and to service as a mobile training center for local/regional hands-on training. The EMDTC is a mobile 911 dispatch center – a “fully integrated, self-contained equipment trailer for deployment during emergency outages and for local operational training”.⁷⁶ Council Staff tried to secure grant funding for the EMDTC but was not successful. It is budgeted at \$1 million. The EMDTC should also allow certain back-up sites and associated costs to be eliminated from the network. The EMDTC will be available to deploy during disasters and other emergencies to quickly support disaster response.

The “Lightning App”

One advantage of the Council’s early contracting (2015) with AT&T for NG911 Hosted Call Handling System is that Kansas is one of the first complete statewide NG911 deployments. The Council’s staff is very knowledgeable on the System’s operations which makes Kansas an

⁷⁶ “Kansas NG911 Strategic Plan 2022-2024”, by the Kansas Coordinating Council Executive Committee, at page 18.

attractive place for NG911 vendors to work on early releases of NG911 features, capabilities and applications.

In June 2023 an AT&T subcontractor – RapidDeploy – approached the Council as the first customer for it to work with on an emerging RapidDeploy product application named the “Lightning App” or “RapidResponder”.⁷⁷ This application is scheduled to be released December 2023. RapidDeploy sought the Council’s and Council staff’s participation in the final development and testing of the Lightning App – in return for a 50% discount for the entire life of the platform.

The App “delivers 911 call data and critical information directly to a first responder’s smart phone or tablet.” It “provides critical response capabilities and actionable intelligence that enhances situational awareness, supports unit safety, reduces response times and improves emergency outcomes – all within a secure mobile app.”⁷⁸ Other state and local agencies (e.g., Kansas Department of Wildlife and Parks, and Kansas Department of Transportation) beyond first responders have also expressed interest in the Lightning App. KDOT is deploying Skyline Technology Solutions video aggregation technology which aggregates live video from KDOT’s traffic cameras and permits secure sharing of these video streams in proximity to emergency calls, giving 911 telecommunicators and first responders real-time situational awareness. Skyline video aggregation can be integrated with the Lightning App to improve emergency response. Further enhancements include the availability of Skyline to schools to make available security video feed which would be available to 911 telecommunicators and first responders in the event of emergency.

Although some PSAPs have similar capabilities from other vendors the Council agreed its participation in final development of the Lightning App was supported by many PSAPs in Kansas. Benefits include:

- The ability to review live scenarios in the field, with advanced mapping and asset tracking and automatic vehicle location (AVL),

⁷⁷ August 25, 2023 Council minutes, at page 4.

⁷⁸ RapidDeploy Lightning: A Mobile App for First Responders; <https://rapiddeploy.com/lightning>

- Extension of RapidDeploy’s Radius Mapping into the field for seamless sharing of data and critical information integrated into the NG911 workflow,
- Secure sharing of data across jurisdictions and agencies⁷⁹,
- Speeding up response times particularly in rural areas,
- Ability to geo-locate an officer or first responder remotely when they are in an accident such as single vehicle rollover,
- Ability to track resources across jurisdictional boundaries especially during large situations requiring mutual aid from other counties,
- A source of help for PSAPs in not being as overwhelmed on occasion, and,
- Creating the public safety infrastructure for enhanced transmission of real time video including Skyline video aggregation.

Costs for the Lightning App are covered by and included in the Council’s Business Case in the i3 future capabilities and would be paid for from the Council’s liquid asset investments.

Council Staffing

The NG911 system includes both the hardware and software platform, and the staff necessary to operate and sustain it. The Act states the LCPA “shall provide the council with any staffing necessary in carrying out the business of the council or effectuating provisions of this act.”⁸⁰

Council staffing and related resources are provided under contracts administered by the LCPA, and include:

- NG911 Administrator
- North Region PSAP NG911 Liaison
- South Region PSAP NG911 Liaison
- Communications and Training Coordinator
- GIS Technical Specialist (contracted with DASC)
- Program Manager (part time)

⁷⁹ Note that the Lightning App could obviate the need for “CAD to CAD” data sharing mechanisms and the associated costs and training.

⁸⁰ K.S.A. 12-5364(d).

Additional resources are provided by the Data Access and Support Center at University of Kansas (GIS) and the LCPA (Mainstream Non-profit Solutions). This is the dedicated and knowledgeable team which managed the deployment and operations of the NG911 system for the state of Kansas.

The Coordinating Council has been hybrid in nature from its inception in 2012 in the 911 Act. At the beginning two staff members were housed administratively at the Kansas Department of Emergency Management and two additional staff resources were contracted for through the Department of Administration for the implementation and deployment of the NG911 system. Since then, the administrative arrangement with the KDEM has ended and the Council has contract arrangements with staff personnel as independent contractors, listed above. Apparently beginning this year, the LCPA began managing these independent contractors.

Our meetings and interviews confirm each of these contracted staff members is exceptionally talented, knowledgeable and dedicated to Kansas NG911. The knowledge, talent and dedication of these independent contractors are a tremendous positive for the Council, the public safety community in Kansas and the state as a whole. The staff deserves a great deal of credit for deployment of the NG911 system in Kansas that is highly regarded among its peers in the public safety community.

The stability of the Council's staff has also contributed to the successful NG911 deployment in Kansas. Key staff members have been serving the state from the very beginning and the newer staff members have fit into the deployment and operational support effort. But from this stems a critical concern: **succession planning**. Each staff member has their own specialized knowledge of the system and its history. There is not an obvious successor for any staff member to which this knowledge has begun being transferred. The maturity of staff and the relationships that have been forged with the vendors are not easily duplicated. We see an urgent need to begin transferring knowledge and planning for future staff transitions. In particular the intricacies of the Council's relationship with AT&T are in the hands of three dedicated individuals – two of which are contractors to the LCPA.

Staffing through the LCPA presents issues which the Council is investigating potential recommended legislative solutions. LCPA is very qualified as a fiscal and accounting entity, but it is not a 911 entity. The LCPA is there as a fiscal agent for the Council. There is concern that

the Council is to manage 911 under the Act and direct staff, not the LCPA. Other concerns include that the term of the LCPA contract is not coterminous with the independent contractor contracts⁸¹ and under one view the LCPA “owns” the independent contractor contracts, and the new LCPA would need to contract again. Also, variance in employee issues vs. independent contractor treatment under the Kansas Open Meetings Act and Kansas Open Records Act. There is a view among some Council members that the staff needs to be responsible to the Council, not the LCPA. But then there is concern regarding the Council, who are all volunteers, having the capacity for any day-to-day management of staff which may be necessary.

There are also issues with using state employment instead of independent contractors for these highly skilled technical workers. State and local agencies have difficulty today keeping up with market pay rates for technical computer and telecommunications employees. There is significant potential for disruption of staff if there were to be a shift from independent contractors to state employees.

Under either approach the succession planning issue is urgent, there is a need to transition the knowledge of the system and AT&T contracts to additional persons. Some interim efforts are being made to broaden the program management capacity from just one person, but all of the current independent contractors are running at or close to full capacity. There is little capacity to spread the program management, system and AT&T contract knowledge among existing contract staff.

Continuity of program management capacity is essential for handling the ongoing and planned system, features and capability upgrades under the Business Case. Contract management, customer service and marketing, and system administration skills are essential as well. The Council is at risk of continuity and coverage gaps currently in the event of unexpected absences of contractors and in the future with expiration of current contracts.

⁸¹ It should be noted that Staff contracts are, by contractual provision within the LCPA contract, transferrable assets. If a new LCPA is chosen by the Council, staff contracts along with vehicles would be transferred to the new LCPA. There is requirement in the RFP issued for LCPA services that any bidder is willing to accept those transfers.

The Council can justify for all these reasons hiring an additional technical person to begin absorbing current workload and begin providing diversity of system knowledge, contractor knowledge and program management.

PSAP Staffing

Stakeholders repeatedly referenced difficulty hiring and retaining PSAP telecommunicator staff. The reasons are well known within the public safety community and are not unique to Kansas. Contributory factors are low pay, long hours without time off and very stressful work with vicarious trauma for which it is impossible to prepare people. High turnover places the burden on remaining employees to staff the 24/7/365 operations of a PSAP. Older employees do not like the significant constant technology change and leave, and younger people in some cases are not willing to accept the schedule and workload of a PSAP telecommunicator. The labor force for PSAP telecommunicators in rural areas can be thin. Current political unrest has made law enforcement work unattractive in some places. The COVID pandemic changed the labor marketplace via extended use of stay at home/work from home staffing.

Some PSAPs have completed local wage studies to identify market wage levels which are over \$15 per hour. Those that can increase pay to this level experience fewer problems with staffing, those that cannot struggle with staffing especially given the proverbial “McDonalds pays \$15 an hour to wrap hamburgers”. But pay increases can be difficult particularly in rural areas given the reliance on local taxes to pay PSAP telecommunicators. There is significant pressure to keep taxes down which limits the ability to increase pay. As a result, a vicious circle exists where low pay inhibits hiring, increases the burden on remaining employees, aggravates turnover by causing burn out and employee departure. Note that this concern also comes up in stakeholder views regarding “Adequacy of Funding”, below.

Approaches being considered to deal with staff shortages among PSAP telecommunicators include increasing PSAP telecommunicator pay, consolidation of PSAPs, and pilot studies of “work from home”. We note that thirty-four states allow 911 fee funds to pay for PSAP telecommunicator personnel costs and this could also be part of a solution although this would take amendment of the Act.

PSAP Consolidation

The Kansas Hosted Call Handling System is ideally suited to support consolidation of PSAPs which would be transparent to the 911 caller. The technical ability to answer any 911 call in the state at any PSAP location is widely used for redundancy and failover purposes today under Memorandum of Agreements between PSAP jurisdictions who are often geographically adjacent.

Prior to the Act, Logan County, Gove County, and the City of Oakley made the decision to locate the emergency communications dispatch function with the Oakley Police Department. “The [Oakley Police Department] Communications Center has 5 Communications Officers which are responsible for dispatching emergency units in a 1,800-square-mile area. The Oakley Communications Center is the only 911 Center in Kansas that has 2 complete counties of coverage.”⁸² Now the Kansas Hosted Call Handling System easily supports this preexisting arrangement, and the 911 caller in Gove County does not know a PSAP telecommunicator has answered the call in the Emergency Communications Center operated by the Oakley Police Department. Under a pre-Act agreement which has been “grandfathered”, the two counties pool the \$60,000 minimum County payment each receives to support the Emergency Communications Center operated by Oakley Police Department covering the two-county area. More recently (following the Act), Edwards County has an agreement with Ford County to cover its 911 dispatch functions under contract and pays for that contract using 911 funds.

Other counties are exploring this option but the momentum has slowed since there is some uncertainty regarding future Council disbursements for 911 to consolidating jurisdictions. One question at a high level is can the \$60,000 minimum payment due one county be paid to another county for its PSAP operations under a consolidation agreement? Related questions include could the county contract for less than the \$60,000 and used the retained funds for its own emergency communications costs? Also, how would the Council’s (and the Act’s) expenditure review process apply to these situations? The Council began exploring these questions in its October 27, 2023 Council meeting. The provisions regarding distribution of funds to PSAPs in

⁸² City of Oakley Police Department. <https://www.discoveroakley.com/149/Police-Department> (viewed October 24, 2023).

the Act⁸³ does not appear to directly address what happens with PSAP distributions after consolidation. The Act references “distribution of moneys to PSAPs”, and a “minimum county distribution of \$60,000”. In a county with one PSAP can that minimum \$60,000 distribution go to a neighboring PSAP jurisdiction if the two entities agree to consolidate emergency communications response? The Council has formed a working group to consider these practical concerns under present statutory language in the context of additional jurisdictions that are evaluating consolidation. These jurisdictions need to know how the 911 funds would be distributed if they were to consolidate to conduct a proper analysis of budget impact.

PSAP Survey Comments on “Work from Home” Pilot Potential

PSAPs were asked in the PSAP survey to offer any additional comments on a potential trial program using trained work from home telecommunicators. As indicated above, respondents were evenly split – 50/50 – in whether they would support the concept of a “work from home” pilot assuming key concerns including security could be properly addressed. Numerous thoughtful comments were provided. One PSAP observed that “Rural areas are struggling with staffing more than technology at this point.”

One of the most comprehensive responses stated:

I appreciate your inquiry regarding the potential trial program for utilizing trained work-at-home PSAP telecommunicators. While I acknowledge the importance of exploring new ideas and strategies, I have some concerns about the feasibility of this approach. The dynamics and logistical challenges associated with implementing a work-at-home model in a Public Safety Answering Point (PSAP) environment are quite intricate. It is essential to consider factors such as data security, emergency response coordination, and the potential impact on the quality and speed of service. I believe that a comprehensive and well-thought-out analysis of the benefits and drawbacks, along with a detailed plan for addressing the logistical challenges, would be necessary before considering such a trial program. By taking a thoughtful and measured approach, we can ensure the safety and effectiveness of our emergency response systems while exploring innovative solutions. I

⁸³ K.S.A. 12-5374.

value the opportunity to provide input on this matter and look forward to further discussions to explore the viability of this concept.

We concur.

Additional valuable cautionary and instructive comments were provided:

- This is a huge step and requires more than most will think to pull off. Very ambitious of the council to think this is ready, but concerned most in the state cannot handle the exclusion of this service from their purview. I like the idea, but not sure if 911 is ready in most areas to be run like call in tech support.
- Just because the technological capability is there doesn't mean its in the best interests of our citizens. There are too many HR questions & impactions.
- Dispatch does more than receive 911 calls. They process records, case reports, warrants, registered offenders, civil service. They are notaries. All of these could not be done from home.
- Our PSAP telecommunicators also serve as the first contact in our lobby.
- For a trial yes, for an emergency situation - long term staff shortage etc. I would need to understand the pay structure more. For example, county commissioners are not going to like paying someone in Ohio to sit at home and take calls for our county.
- Possibly instead of work at home, regional area PSAP could work together to help each other while short.
- I have a lot of questions about the security issues involved with call takers/dispatchers working from home. How do we monitor if they are in compliance with CJIS policies and procedures? How are they supervised? How do we provide camaraderie with each other and the agencies we serve? How do we prevent background noise on the phone/radio from the individual's residence?
- My only concern would be confidentiality issues.
- Security would be my biggest concern.
- Our center is call taker/dispatcher all in one (one person working at a time).
- Would be difficult for our low volume.
- Getting the bandwidth needed to run at home with private internet services will be nearly impossible in rural areas.

- I do not believe work-at-home is an acceptable solution to staffing 911 communications centers. Staff need to be on site to have all resources available to them as well as the peer-to-peer support that would be lacking in an at-home environment.
- I have a lot of questions about how this works in rural areas since many fire/EMS agencies still utilize VHF and UHF standards. There is also the local aspect of knowing the area and the people served in the smaller areas, because it is almost a public expectation out here.
- It would be hard to validate the time that is actually spent working and training would have to be done in house anyways with a trainer.
- Concern over lack of oversight and information pass along.

Many PSAPs wanted more information on the concept and potential implementations and would consider a trial/pilot:

- I honestly think we would open up the pool of applicants if work at home was available. This was talked about a lot from our Agency when Covid hit really bad in our area and people were getting locked down, and families were quarantined. Or even with the staffing shortage and dispatchers being able to work from home when having to work many many days in a row. I think the burn out would lessen a lot. Speaking from experience with the long stretches it does wear one down and it is hard on families. Burn out is a real issue.
- Strictly 911 operators--not ones running law enforcement traffic, might be a very valuable tool. Might be able to generate a pool of call takers that could support multiple counties.
- I think this would be an interesting trial program.
- Interested.
- I would have to know a lot more about it. Need the “deets”.
- I would be interested in learning more about this program.
- Contact us and tell us more.
- Would be interested in how it works. Would also need a cost breakdown for working from home.
- It would be interesting to see how this could work out.

- I would love to trial this with Sedgwick County staff, not a third-party vendor. I have asked for this option from the Council and have not had any traction with it so I'm excited to see this as a possibility.

The COVID-19 pandemic has reshaped the way many industries operate, and the realm of public safety answering points (PSAPs) is no exception. As the need for social distancing and remote work capabilities became evident, PSAPs faced the challenge of ensuring uninterrupted emergency services while safeguarding the health of their telecommunicators. The experiences of Alexandria and Arlington in Virginia provide valuable insights into for a potential pilot of work-from-home capabilities for telecommunicators.

In the initial phases of their work from home trial, the focus was primarily on call takers. This makes sense given the nature of their work, which involves receiving emergency calls and gathering essential information. With the right technological solutions, this role can be effectively managed from a remote setting. However, the role of dispatchers, who handle radios and Computer-Aided Dispatch (CAD) systems, presents more complexities. Feedback from industry professionals suggests skepticism about the feasibility of remote radio systems. One response noted, “I don't know how it would be possible to have a working radio system in homes.” Another pointed out the challenges of having a CAD and radio system that can be used from home, stating, “this would not be feasible at this time.”

Kansas, like Alexandria, utilizes the VESTA solution, which offers tools designed for remote telecommunicator operations. Alexandria's success with remote dispatching can be attributed to a combination of FirstNet, a dedicated public safety broadband network that provides the necessary bandwidth and reliability for telecommunicators to handle emergency calls without interruption, even in a remote setting, and a remote desktop product called VESTA CommandPOST, which allows telecommunicators to access the systems they need, just as if they were in the PSAP.

Alexandria's journey offers several lessons for other PSAPs considering remote work capabilities and wanting to minimize disruptive effects on their operation:

1. Start Small: Begin with a pilot program, focusing on a small group of telecommunicators. This allows for real-time feedback and adjustments before a broader rollout.

2. Prioritize Security and Training: Given the sensitive nature of the information handled by PSAPs, ensuring data security in a remote setting is paramount.
3. Regularly Review and Adjust: As with any new initiative, regular reviews and adjustments based on feedback and changing circumstances are essential.

While there are challenges associated with implementing work-from-home capabilities for telecommunicators, the tools and technologies to make it possible exist. With careful planning, robust training, and the right technological solutions, PSAPs can ensure that their telecommunicators can effectively serve the public, whether they are in the PSAP or working remotely. The Council could form a committee of volunteers to consider whether and how a work from home pilot program could be structured which accounts for the concerns expressed and seeks the potential staffing benefits.

Training

The Act permits the Council to “recommend standards for general operations training for PSAP personnel” and to “establish training standards and programs related to the technology and operations of the NG911 hosted solution”.⁸⁴ However, the Council may not “impose any requirements that creates a mandatory certification program of PSAP operations or PSAP emergency communications personnel.”⁸⁵

The Act also permits the Council to make grants from the Federal Grant Fund for “training PSAP personnel to provide effective service to all users of the emergency telephone system who have communications disabilities”.⁸⁶ At present the Federal Grant Fund has no assets.

The Council is planning for upcoming training needs including update of the SMS-to-911 training video that is Kansas-centric, upcoming RapidDeploy releases of the map, the Lightning app, GM OnStar auto-crash response, VESTA training and generally keeping up with evolving technology. Furthermore, the FCC’s NPRM requires training for handling calls from the Deaf and hearing-impaired community through Telephone Relay Systems. The Council through its Communications and Training Coordinator is using a new contracted training resource

⁸⁴ K.S.A. 12-5364(e)(1).

⁸⁵ K.S.A. 12-5364(e)(2).

⁸⁶ K.S.A. 12-5365(d)(2).

(Moetivations Inc.) to make online classes available with greater relevance and applicability through the Kansas NG911 Learning Center.

The Council is well versed in delivering training for PSAPs and PSAP telecommunicators. According to the *State of Kansas 911 Training Standards* document:

Emergency Communications is the only sector of public safety that does not require a minimum number of training hours before being thrust into the field, handling critical situations. Firefighters, paramedics, and law enforcement officers all have minimum training standards. The role an emergency dispatcher plays in a public safety incident is just as critical as the role a firefighter or paramedic may play, therefore we need to do all we can to ensure that dispatchers are prepared for that role.⁸⁷

The Council’s Strategic Plan sums up its training approach⁸⁸:

NG911 training is, and will remain, a big deal for several reasons. First, turnover in our PSAPs remains high. In most cases, new personnel require extensive initial training. Second, veteran Public Safety Telecommunicators (PSTs), formerly referred to as “911 dispatchers,” need refresher training to stay proficient in their work. Third, NG911 is an ever-emerging technology with new applications that significantly enhance first response. As new features emerge, our PSAP administrators and frontline personnel need training in new capabilities.

Since training is crucial, Council staff has developed a multi-penetration approach to NG911 training. And the approach is constantly being reviewed and revised to effectuate sufficient and adequate training on the NG911 system. Here are a few examples:

- PSAP Bulletin, weekly
- PSAP Administrator Calls, bi-weekly
- Website notification
- Social media outreach (Facebook, LinkedIn, etc.)
- PSAP migration training, as required

⁸⁷ Kansas 911 Coordinating Council. *Kansas 911 Training Standards* (2014), page 3.

⁸⁸ “Kansas NG911 Strategic Plan 2022-2024”, by the Kansas Coordinating Council Executive Committee, at page 6.

- Kansas APCO training, bi-annual

The Council is considering an additional training resource – an NG911 Trainer. This is important because the NG911 Administrator, the Training Coordinator and the PSAP Liaisons do not have the necessary “bandwidth” to take on additional training duties. Much of previous training was associated with project implementation and vendor provided. With NG911 implementation complete vendor provided training will be less available. Further, in some cases the training is video-based with no hands-on training. This is less desirable since the most beneficial training would provide hands-on training seeing the same configuration and screens as their home PSAP call handling, not a generic layout.

The contracted Trainer would help develop a new curriculum suited to the NG911 system’s operational status, so that all elements of the system are included in regional training and then deliver training based on that curriculum, rotating among regions. Ongoing training is essential due to new i3 applications, and also important for many new PSAP employees given the high turnover rate among PSAP telecommunicators. The regional training could be delivered in conjunction with the EMDTC.

More generally, training is essential for an effective emergency response system. As technology evolves and the demands on PSAP telecommunicators grow, and facing high PSAP telecommunicator turnover, it is essential to ensure that these telecommunicators are equipped with the knowledge and skills they need to serve the public effectively, especially in an era where communication methods are diversifying rapidly, and the expectations of the public are higher than ever.

The KLETC initiative referenced above to form a basic academy for Communicators could address many of these issues and concerns. The Communicators Academy would be hosted at the Kansas Law Enforcement Training Center (KLETC), to teach both basic call equipment usage and additional Communicator skills needed by professional Communicators and provide professional certifications to those who complete the coursework. Focused professional Communicator training could lead to less turnover, higher pay with justification for it and a long term career path for graduates. Accordingly, some Council members see the development of training through KLETC by their professional staff and subject matter experts as an appropriate and cost-effective utilization of Council 911 funds.

During system implementation vendor and Council training has focused on the operational aspects of the system. Operational training will continue to be important going forward with the implementation of system updates and new i3 features and capabilities. Now with the FCC NPRM ensuring end to end IP communications and requiring Internet-based TRS providers to complete all translation and routing to deliver 911 calls including associated location information in IP format, ensuring direct access for people with disabilities becomes a pivotal challenge. Direct access is not just about technology; it is about ensuring that every individual, regardless of their communication abilities, can reach out to emergency services without barriers. This means that PSAPs must be equipped to directly receive TDD/TTY calls without relying on outside relay services or third-party services. Moreover, when such calls are received, PSAPs must adhere to proper procedures, including handling Voice Carry-Over (VCO) and Hearing Carry-Over (HCO) calls.

Disparities persist despite ADA and DOJ requirements for direct access. The Americans with Disabilities Act (ADA) mandates agencies to conduct periodic self-evaluations of their programs, policies, and services. This is to ensure that all citizens, including those with disabilities, have equal access. The NENA Manager's Guide to Title II: Direct Access provides clear guidance on this. Agencies must not only evaluate their current services but also involve individuals with disabilities in this evaluation process. Engaging with organizations or agencies that cater to people with disabilities can be a strategic approach to ensure comprehensive feedback – the Act ensures this by designating a voting member recommended by the Kansas commission for the deaf and hard of hearing.⁸⁹

Training is a cornerstone in bridging this disparity. The APCO/NENA ANS 3.105.1-2015 Minimum Training Standard for TTY/TDD Use in the Public Safety Communications Center sets a clear expectation: every Telecommunicator who might answer a TTY/TDD call must be trained to this standard before working independently on the dispatch floor.

For Kansas, this self-evaluation is not just a regulatory requirement; it is an opportunity. By assessing the current level of service provided to people with disabilities, the state can identify gaps, implement solutions, and ensure that its emergency response system is truly inclusive. The

⁸⁹ K.S.A. 12-5364(a)(2).

Commission for the Deaf and Hard of Hearing could assist the Council in setting priorities for training and feature implementation to provide direct access for the deaf and hard of hearing community.

Funding for training is important and especially so for PSAPs due to the staffing shortages/turnover they face. Feedback from the PSAP Survey underscores a dual need: additional funds for PSAPs and enhanced training. This increases the concern over the current void in the State 911 Maintenance Fund. Funding the Maintenance Fund, which is earmarked for purposes including training, could provide PSAPs across the state with another option for necessary training resources. This is especially crucial for ensuring that individuals with communication disabilities receive the service they deserve. By bolstering both the Maintenance Fund and onboarding an NG911 Trainer for Council staff, Kansas can significantly elevate the quality and inclusivity of its emergency response system.

Status of Findings and Recommendations from 2018 Performance Audit Report

- The previous report found that “it is crucial that the Council conduct network monitoring and SLA (Service Level Agreement) performance evaluation to monitor system and Vendor performance, particularly given the lack of network redundancy and diversity.”⁹⁰ The Council responded that the Council undertook extensive network design effort, and also uses the AT&T Resolution Center for network monitoring and field support. The Council also supported the view that full redundancy to achieve “5-9’s” (99.999%) service availability is neither feasible nor affordable.⁹¹ The Council notes new fiber facilities would be required in most of the rural locations to avoid shared facilities begin used for last mile facilities. We concurred with the Council’s clarifications.
- The previous report observed that SLA performance reporting had not been finalized and needs to “include network monitoring to observe network performance in real time, to address system failures/outages and monitor dispatch times of technical support

⁹⁰ 2018 Performance Audit of Kansas 911 System, at page 93.

⁹¹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 10.

personnel dispatched to rural PSAPs, and monitoring of call answering and wait times for support calls to the Resolution Center.”⁹² The Council stated system trouble tickets and outages are reviewed weekly and a compiled metrics report for assessing service level impact was being developed.⁹³ We accepted the Council’s clarification.

- The previous report recommended a system feature or manual workflow that provides the PSAP manager with a notification or alert upon trouble ticket creation, triage and closure.⁹⁴ The Council identified three areas of improvement for trouble ticket notification, unanswered support calls and consideration of “smart hands” concept to improve response time.⁹⁵ We accepted the Council’s clarification.
- The previous report noted some use by PSAPs of hardware and/or software which is not vendor supported and dependent solely on internal support by PSAP or other agency staff which raises continuity concern for PSAP operations. The report recommended that Council staff follow up on these concerns with all PSAPs during the annual network audit.⁹⁶ The Council stated these systems are outside the hosted call handling system and thus are outside the Council’s purview absent statutory change.⁹⁷ We agreed with the Council’s information.
- The previous report found Council staff was spread too thin and recommended two additional support positions and a second PSAP liaison position.⁹⁸ The Council agreed with the need for additional staffing but thought it better to split the Communications Director position to include other administrative tasks.⁹⁹ We accepted the Council view and it ultimately gained additional staffing as recommended.
- The previous report recommended a stakeholder awareness and outreach plan and presentation to educate stakeholders outside the public safety arena and inform Council

⁹² 2018 Performance Audit of Kansas 911 System, at page 93.

⁹³ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 11.

⁹⁴ 2018 Performance Audit of Kansas 911 System, at page 94.

⁹⁵ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at pages 8-9.

⁹⁶ 2018 Performance Audit of Kansas 911 System, at page 94.

⁹⁷ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 11.

⁹⁸ 2018 Performance Audit of Kansas 911 System, at page 94.

⁹⁹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 2.

stakeholder groups and the public safety community generally of Council initiatives. This effort would be supported by the additional staffing also recommended.¹⁰⁰ The Council agreed with this recommendation.¹⁰¹

- The previous report found the GIS partnership between DASC at University of Kansas and the Council to be a tremendous benefit for the statewide NG911 platform. The previous report endorsed the Council’s plan to add a GIS Specialist position.¹⁰²
- The previous report recommended continued work on evolution and implementation of cybersecurity plans, listing various items.¹⁰³ The Council expressed concern that the report may leave readers with the false impression that Kansas has not adequately addressed cybersecurity and provided an extensive list of Council policies, strategies and actions to address cybersecurity.¹⁰⁴ We concurred with the Council’s description of its cybersecurity policies, strategies and actions.

Findings and Conclusions

The Council has procured, deployed and implemented a standardized Statewide NG911 solution with the initial set of features and functions. By its nature the system is designed to evolve and support growth and new features as they become available. However, the Statewide platform and NG911 itself is not something that will truly be “completed” due to ongoing upgrades and enhancements that are needed to keep the platform up to date with deployment of updates and upgrades, new technology and features.

Sufficient time has passed from the Act to have a robust view of what the State of Kansas has accomplished with NG911 deployment. We believe the Council, Council staff, the vendors and the PSAPs have managed the statewide rollout of the NG911 platform exceptionally well. All PSAPs including rural PSAPs throughout the state can access the most up to date emergency communication hardware and software improving their overall 911 emergency communication

¹⁰⁰ 2018 Performance Audit of Kansas 911 System, at page 94.

¹⁰¹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 11.

¹⁰² 2018 Performance Audit of Kansas 911 System, at page 94.

¹⁰³ 2018 Performance Audit of Kansas 911 System, at pages 23-25.

¹⁰⁴ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at pages 3-7.

service to the citizens of Kansas to a very high level. The State of Kansas and its 911 Coordinating Council and staff are among the national leaders in the transition to NG911. The Council, its staff and the Kansas PSAP community should be applauded for all their efforts and dedication to implement and deploy the statewide NG911 platform.

One of the unsung heroes supporting the widespread adoption and success of the Kansas NG911 System is the Kansas GIS team. The Data Access and Support Center at University of Kansas has the existing relationships and respect from local GIS data stewards throughout the State, 100% of whom participate to provide the basic and essential GIS data integration supporting the Kansas NG911 system.

AT&T holds the prime contract for providing the Kansas NG911 System and has performed well. The benefits to the State for a single prime contract provider are: one responsible vendor in the event of issues or problems, reduced management and operational cost requirements for the Council including less staffing required, ubiquitous deployment of standardized technology deployment statewide, and the ability to quickly update technology statewide in response to future upgrades to the NG911 specification and features. However, AT&T's position as the single prime contractor for the statewide NG911 system introduces a need to discuss and manage cost controls for future upgrades, enhancements and additional features since moving the platform to a different vendor upon expiration of AT&T's current contract would be extremely complex.

The Act seeks "development and implementation of next generation 911 service"¹⁰⁵ through the funds established by the Act and directs the Council to "develop strategies for future enhancements to the 911 system".¹⁰⁶ Has the Council achieved these objectives? The Council has achieved the statewide implementation of the complete system with the initial range of features and capabilities. The NG911 system has been installed and all Kansas PSAPs except those in the MARC region are connected to it. The Council and the system have moved into an operational state rather than implementation state. But in the technological world there will be ongoing upgrades and enhancements that are needed to keep the NG911 platform up to date.

¹⁰⁵ See for example, K.S.A. 12-5368(c).

¹⁰⁶ K.S.A. 12-5364(a)(1).

Future System Cost Controls

The Council, Council staff and AT&T have had a symbiotic relationship during implementation and deployment of the NG911 system. The NG911 system as deployed is considered to be one of the best in the country by Kansas's peers in public safety, but contracting with a single prime contractor raises concerns over cost control for future years. Because of the close business relationships between AT&T and staff, the existing Council and staff has been successful at negotiating fair costs from AT&T. However, when the contract term expires, or existing staff have turned over or retired, it may become very difficult to move away from the incumbent provider, even if that is the desire of the Council. For all the reasons that made a sole provider the best solution for Kansas NG911, it also introduces complexities for how to best manage future costs or switch to another provider.

Council/Staff discussions on these matters should focus on AT&T cost control and staff succession planning. The existing relationships appear to be working well today. That can always change quickly and having an action plan on these matters now is highly recommended. We see an urgent need to begin transferring knowledge and planning for future staff transitions since the intricacies of the Council's relationship with AT&T are in the hands of three dedicated individuals – two of which are contractors to the LCPA.

The FCC Notice of Proposed Rulemaking on NG911 IP Transition

The FCC issued a Notice of Proposed Rulemaking (NPRM) in June 2023 and these proposed rules are likely to be adopted although the timing is uncertain. The proposed rules are intended to accelerate the transition and deployment of NG911 across the country by providing a date certain for end-to-end transmission of 911 voice, video, data in Internet Protocol format including Telephone Relay System emergency calling from the Deaf and hard of hearing community.

These rules are a key driver of costs the service providers supporting the NG911 system will experience, the capabilities the Council will be able to add to the NG911 system – and their costs, and costs and training requirements for the Kansas PSAPs. There are many cost and

operational implications flowing from the FCC's new NG911 transition rules. Thus, the emphasis on NPRM provisions and implications in this Report.

The FCC NPRM is driven by the fact that many states and local jurisdictions are behind Kansas in the transition to NG911. But Kansas has a fully implemented statewide Hosted Call Handling System.

The NPRM underscores the strategic advantage that the state of Kansas has achieved with its forward-thinking 911 platform positioning Kansas at the forefront of emergency response systems. In contrast to other jurisdictions, Kansas stands out with a system that is not only advanced but also primed for immediate integration with emerging technologies, embodying a true "plug and play" readiness, and that is ready to integrate further changes to NG911 as the NG911 standard evolves.

Implications for Kansas given this full implementation are:

- There is a need to address the costs caused by this transition for the service providers who must install new facilities which are especially difficult for smaller PSAP locations to absorb. The Council is evaluating a centralized solution where rural LECs use an existing network to bring 911 data traffic to a centralized location where it is carried further to the redundant points in AT&T's network (Dallas TX and Fairfield CA) with the Council paying an equitable share of this cost, but final decisions have not yet been made. If the Council elects to go in this direction it is a new, not previously budgeted expenditure.
- The path is clear for the Council to begin roll out of additional NG911 platform features and capabilities enabled by the i3 architecture and it has plans to do so based on what it has heard to be features and functions considered to be useful and valuable by Kansas PSAPs. These features and capabilities come at a cost estimated to be \$12-13 million annually which will be paid for from the Council's liquid asset balances. The Council has saved these funds for this purpose.
- The PSAPs will be receiving more emergency calls from the Deaf and hard of hearing community because of the NPRM than have been presented in the past. PSAPs recognize this and have noted in their survey responses a need for training in handling these calls.

- PSAPs have significant training needs for operation with new i3 features and capabilities as well as increased calls from Telephone Relay Systems newly integrated into the 911 IP network.

Costs and Implementation of i3 Features and Capabilities

The Council's Business Case considers which new i3 features and capabilities to implement on the NG911 system in the future and their estimated costs. These new features and capabilities in the Business Case align with and were confirmed by the PSAP Survey we conducted. The list is extensive and includes enhancements to the ECaTS system¹⁰⁷, system upgrades and refreshes, vendor upgrades, PSAP to PSAP chat, pilot and proof of concept for 3D mapping, interconnections with MARC region, Automated Automatic Callback, RAVE panic buttons for schools, PSAP access to third party databases, indoor mapping, geospatial search capabilities, artificial intelligence and predictive analytics, integration of KDOT cameras, roll out of the Lightning app, TRAINFO, real time transcription of calls, integration of drones, and others. This is a very new area and features and capabilities will no doubt continue to develop and be offered by the vendors. These features have costs – the Council estimates \$12-14 million annually through 2030. If the cost projections prove accurate and the Council added all these features and capabilities to the NG911 system, it would absorb all the Council's currently invested funds.

As new i3 features and applications become available, it is important to educate all PSAP's on the benefits they will provide the individual PSAP's and the Kansas statewide NG911 system. This should be done as early as possible in the planning process to obtain buy-in, avoid misunderstandings and increase statewide usage/adoption of the new technologies.

Some of the smaller PSAPs would prefer the monies for new i3 features be used to increase their financial allocations in order to pay better salaries to attract necessary personnel or purchase radios or other equipment deemed more critical to their particular situation/operations.

¹⁰⁷ ECaTS provides administrators with analysis of calls and events and other capabilities.

Training and Training Gaps

The evolution of the NG911 system and addition of new features and capabilities drives the need for and importance of continued training for PSAP administrators and telecommunicators.

Numerous new i3 features and capabilities are available for deployment on a continuous basis. Real Time Text will be deployed in 2024. Training telecommunicators to handle RTT calls will be pivotal in ensuring that this technology delivers on its promise. Increased volumes of SMS to 911 can be expected with updated public education materials.

One result of the FCC NPRM will be new and increased volumes of emergency calls from the Deaf and hard of hearing community against a backdrop of preexisting unfamiliarity at PSAPs with use of TTY and similar devices. These and similar considerations make updated, continuous and specialized training essential.

Integrating TRS services into NG911 may require specialized training to be developed outside of the normal operational training requirements. Including TRS supporting organizations in planning for curriculum development will keep Kansas NG911 among the national NG911 leadership. It is a big advantage in this regard for the Council to have member representation from the Kansas Commission for the Deaf and Hard of Hearing.

This member representation will help the Council meet federal accessibility requirement of 911 systems. PSAPs must be equipped to handle TRS calls when they come through. The responses from the recent PSAP survey indicate unfamiliarity with devices like TTYs among telecommunicators in Kansas and a desire for training. While Kansas has established training standards for PSAPs, and national bodies like NENA/APCO have their benchmarks, the Council should also consider instituting mechanisms that ensure telecommunicators receive training which encompasses comprehensive modules on 911 accessibility, ensuring that all individuals, regardless of their abilities, receive timely and effective responses from 911.

To effectively address training gaps, it will be a big help for the Council to complete the process for bringing a Training Coordinator onboard, which will ensure that a dedicated entity is in place to oversee and enhance the training regimen for telecommunicators. Furthermore, it's crucial to fund the 911 Maintenance Funds, providing state PSAPs with the necessary resources to finance comprehensive training programs. By taking these proactive measures, Kansas can ensure that its

telecommunicators are well-equipped to handle the evolving demands of their roles, offering efficient and inclusive emergency response services to all residents.

The Council currently has a Kansas 911 Communication and Training Coordinator who is the central figure in implementing the new training contractor's (Moetivations Inc.) training modules on the Learning Management Center, streamlining training processes, updating curriculum based on evolving needs, and ensuring up to date training materials available for all PSAPs. The Council is also considering contracting with a NG911 Trainer to support regional training on a rotating basis using the EMDTC and other settings. This is an important addition since the NG911 System has shifted into operational (not implementation) status, so vendor training is ceasing, new i3 features and applications are coming online, and PSAPs face ongoing high turnover necessitating frequent training as part of the onboarding process for new employees.

Council Structure

The legislative intent in dividing voting and non-voting members of the Council, and more importantly who is non-voting and why when the Act was created in 2012 is not evident to us. The structure has largely worked but one could wonder why statewide representatives of elected officials with budget authority over local PSAPs and public safety – the Kansas Association of Counties and the League of Kansas Municipalities – are non-voting Council members. A similar point could be made for the two currently non-voting representatives of “non-traditional PSAPs” (currently served by University of Kansas Public Safety and Potawatomi Tribal Police). However, this would require legislative change.

Council Staffing and Succession Planning

The Council is currently considering what is the best NG911 management and staff structure going forward given the status of the system, planned enhancements and additions to the system, and future training and operational support needs. This includes the role of the LCPA who presently contracts with and manages the Council staff. The contracted Staff currently in-place are **highly knowledgeable, dedicated professionals** intimately familiar with the Kansas NG911 network evolution, contracts and operations. But there is no junior staff getting ready to take the reins, or structured succession plan for these mission critical positions. This introduces risk for

future program integrity should key contracted individuals suddenly become displaced for whatever reason. Furthermore, it is apparent that staff are running at 100% utilization or more.

For these reasons it is eminently justifiable for the Council to consider hiring an additional technical person to begin absorbing current workload and begin providing diversity of system knowledge, contractor knowledge and program management. While no one is irreplaceable the Kansas NG911 system would be in a bad place for a while if a key staff member was displaced for any reason. Continuity of program management capacity is essential for handling the ongoing and planned system, features and capability upgrades under the Business Case. Contract management, customer service and marketing, and system administration skills are essential as well. The Council is at risk of continuity and coverage gaps currently in the event of unexpected absences of contractors and in the future with expiration of current contracts.

It should be noted that the AT&T Service Manager contract is very worthwhile given current staffing, covering tasks and issues that Council staff would otherwise have to cover.

There is some murkiness and inconsistency with the current management structure of contracted staff. Staffing through the LCPA presents issues which the Council is currently working on. There is concern that the Council is to manage 911 under the Act and direct staff, not the LCPA. Other concerns include that the term of the LCPA contract is not coterminous with the independent contractor contracts and under one view the LCPA “owns” the independent contractor contracts, and the new LCPA would need to contract again. But then there is concern about a volunteer Council having the capacity for any day-to-day management of staff which may be necessary. The Council has recognized this and is forming a working group to assess these issues.

PSAP Consolidation

The concept of PSAP consolidation presents a logical and efficient approach warranting active encouragement. Recognizing that operational challenges in maintaining appropriate staffing levels have reached a critical juncture, discussions surrounding PSAP consolidation are already in progress, aiming to address and rectify these specific situations, and there is a proposal on the table to establish a dedicated committee to delve deep into the intricacies of consolidation, offering solutions and resolutions where needed. In scenarios where consolidation might not be

feasible or is not the preferred route, introducing a work-from-home option is also presented as a viable alternative with existing industry standards in place to facilitate this option. Such an approach could significantly alleviate staffing shortages faced by PSAPs, ensuring that emergency response services remain uninterrupted and efficient.

PSAP Staffing

Attracting and retaining skilled PSAP telecommunicators has emerged as a pressing concern in Kansas. As the technological landscape evolves, the demands on telecommunicators intensify, requiring them to adapt to new systems and processes, which may also challenge retention of this much needed staff. This learning curve, coupled with the challenges of inadequate pay and stressful work conditions and long hours, has made it challenging for PSAPs to maintain staffing levels. Some PSAPs report that their starting pay levels are half that an employee could earn at McDonalds.

One of the more compelling arguments for raising telecommunicator salaries is the critical nature of their role. Given the weight of their responsibilities, it is reasonable that their compensation reflects the value they bring. Competitive salaries would not only attract a larger pool of qualified applicants but also reduce turnover rates, ensuring that experienced and trained professionals remain in the system. Higher salaries can lead to increased job satisfaction, and longer job tenures. Investing in telecommunicators is, in essence, investing in the safety and well-being of the community.

Feedback from the PSAP Survey underscores this, with many PSAPs highlighting struggles to maintain adequate staff. Telecommunicators serve as the first point of contact in emergencies, and their efficiency can mean the difference between life and death. Their responsibilities are vast, from understanding complex technological systems to demonstrating empathy and quick thinking in high-pressure situations.

Pilot Trial of Work from Home

One option which may be able to mitigate PSAP staffing issues would be “work from home” as a staffing augmentation (not replacement). Survey responses from PSAPs indicate a great deal of interest in exploring work from home on a pilot basis, and also a realistic sense of the challenges

that must be overcome to make it work. The Survey responses also contain a pool of willing volunteers for any pilot trial that could be put together. Because of the perceived value for a work from home option for staff augmentation, the Council could establish a committee of volunteers to analyze what it would take for this to be possible and how the pilot program could be structured to account for the concerns expressed and seek the potential staffing benefits. . Technical, Security and Operational aspects should all be examined to determine the structure of any pilot or pilots.

Issues For Further Consideration

The Council and the Legislature may wish to consider the following issues:

- If the Legislature decides to consider amendments to the Act:
 - Pay for PSAP telecommunicators in many places is too low to attract and retain qualified staff, especially given the long hours and high stress associated with the position. An amendment to the Act could be considered to allow PSAP personnel costs as one of the allowable uses of 911 fees.
 - The rationale for and identification of non-voting members of the Council could be considered, especially whether statewide representatives of elected officials with budget authority over local PSAPs and public safety – the Kansas Association of Counties and the League of Kansas Municipalities – and currently non-voting representatives of “non-traditional PSAPs” should in fact be voting members. This would require amendment of the Act.
 - Consolidation of PSAPs is technically “easy” with the Statewide Hosted Call Handling System, particularly in rural less densely populated areas. Two instances of beneficial consolidation have occurred, and more are being considered. But consolidation planning has paused while the potentially consolidating jurisdictions evaluate provisions of the Act which do not directly address distribution of moneys when consolidation occurs. The Council and the Legislature could consider amendments to the Act which eliminate these uncertainties and favor consolidation if jurisdictions decide to move that direction. Particularly with the potential of the Lightning app PSAP

consolidations make sense from public safety, PSAP staffing and financial administration perspectives. Consolidation should be encouraged for these benefits and the Legislature could consider amendments to the Act to clarify distribution of funding as well as obligations to provide more clarity for jurisdictions that want to consider consolidation.

- The Council could consider hiring additional more junior or assistant level staff as part of the approach to succession planning. Such additional staff could spread and relieve senior staff workload while absorbing system knowledge to provide future succession options.
- Sustainable funding for training initiatives is crucial to ensure their longevity and effectiveness. The State 911 Maintenance Funds, designed to support, among other things, the training of telecommunicators, could be an important source of funds for this. By funding this Fund account, PSAPs can be provided with the financial support they need to cover training costs. This not only alleviates the financial burden on local PSAPs but also ensures that available training content remains high and consistent across the board. These funds should be prioritized and adequately funded to complement the efforts of the Kansas 911 Communication and Training Coordinator and to solidify Kansas's commitment to top-tier emergency communication services.

Appropriate Use of Moneys Received

Statutory Charge

The Act states "... the division of post audit shall conduct an audit of the 911 system to determine ... whether the moneys received by PSAPs pursuant to this act are being used appropriately".¹⁰⁸

The Act further states: "The proceeds of the 911 fees imposed pursuant to this act, and any interest earned on revenue derived from such fee, shall be used only for necessary and reasonable costs incurred or to be incurred by PSAPs for: (1) Implementation of 911 services; (2) purchase of 911

¹⁰⁸ K.S.A. 12-5377(c)(1).

equipment and upgrades; (3) maintenance and license fees for 911 equipment; (4) training of personnel; (5) monthly recurring charges billed by service suppliers; (6) installation, service establishment and nonrecurring start-up charges billed by the service supplier; (7) charges for capital improvements and equipment or other physical enhancements to the 911 system; or (8) the original acquisition and installation of road signs designed to aid in the delivery of emergency service.”¹⁰⁹ The Act also specifically prohibits certain costs. Allowable expenditures “shall not include expenditures to lease, construct, expand, acquire, remodel, renovate, repair, furnish or make improvements to buildings or similar facilities. Such costs shall also not include expenditures to purchase, procure, maintain or upgrade subscriber radio equipment.”¹¹⁰

“Upon a finding that the expenditure was made intentionally from the 911 fee fund of such PSAP for a purpose clearly established as an unauthorized expenditure, the 911 coordinating council may require such PSAP to pay the lesser of \$500 or 10%, of such misused moneys, to the LCPA...”.¹¹¹

Section 4.3.2 of the IFB states “the determination of whether moneys received by PSAPs pursuant to the Kansas 911 act are being used appropriately should cover calendar year 2021.”

FCC Revenue Diversion Analysis

Relevant to and reinforcing the Act’s definition of “allowable expenditures”, the Federal Communications Commission also has rules which designate “purposes and functions for which the obligation or expenditure of 911 fees or charges, by any State or taxing jurisdiction authorized to impose such a fee or charge, is acceptable”¹¹² to address diversion of 911 fees for purposes unrelated to 911. These rules went into effect October 18, 2021 thus the Fourteenth Annual Report is the first one to contain diversion analysis under the new rules. New York, New Jersey and Nevada (Carson City and Churchill County) were identified as having diverted a total of \$198.4 million in 911 funds from 911 uses.¹¹³ One consequence of being identified by the FCC as a

¹⁰⁹ K.S.A. 12-5375 (a).

¹¹⁰ *Id.*

¹¹¹ K.S.A. 12-5375(c).

¹¹² Fourteenth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges; submitted pursuant to Public Law No. 110-283, by the Federal Communications Commission, December 30, 2022. 911 Fee Reports and Reporting, <https://www.fcc.gov/general/911-fee-reports> (“Fourteenth Annual FCC 911 Fee Report”).

¹¹³ *Id.*, at page 61.

“diverter” of 911 funds is potential ineligibility for federal grants. Significant grant funds for 911 are potentially going to be available from FCC spectrum auction proceeds – the House Energy and Commerce Committee in May 2023 passed the Spectrum Auction Reauthorization Act¹¹⁴ to reauthorize the FCC’s authority to conduct spectrum auctions for three years and provide \$14.8 billion to fund the next-generation 911 (NG911) platform across the country. The 911 Act and the Council’s operations under it insulate Kansas from being at risk of being ineligible for potential federal grants since all Kansas 911 funds are being used for 911 purposes.

Kansas Use of 911 Fees

Kansas’s FCC 911 Fee Report for calendar year 2021 states “collected 911 fees were utilized by the PSAPs for purchases totaling \$21,393,568.59 in the following areas:

- Implementation of 911 services – 3% of total expenditures
- Purchase of 911 equipment and upgrades – 14% of total expenditures
- Maintenance and license fees for 911 equipment – 42% of total expenditures
- Training of PSAP personnel – 1% of total expenditures
- Monthly recurring charges billed by service suppliers – 30% of total expenditures
- Installation, service establishment and nonrecurring start-up charges billed by the service supplier – 2% of total expenditures
- Charges for capital improvements and equipment or other physical enhancements to the 911 system – 8% of total expenditures
- The original acquisition and installation of road signs designed to aid in the delivery of emergency service – 0% of total expenditures

The Council’s Expenditure Review Committee

The Act requires the Council to annually review expenditures of 911 funds as reported on each PSAP’s Annual Report.¹¹⁵ This review is conducted to ensure that 911 fees are spent only on the

¹¹⁴ “H.R. 3565 — 118th Congress: Spectrum Auction Reauthorization Act of 2023.” www.GovTrack.us. 2023. October 19, 2023 <https://www.govtrack.us/congress/bills/118/hr3565>

¹¹⁵ K.S.A. 12-5375(c).

eight approved uses contained in the Act.¹¹⁶ Each PSAP submits its expenditures and other information due by March 1st via the 911 Portal administered by DASC. PSAPs may also seek pre-approval of expenditures under the Act.

The Council has adopted the “Kansas 911 Expenditure Review Committee Charter”¹¹⁷ which lays out the provisions of the 2019 amendments to the Act pertaining to the Expenditure Review Committee and its authority, the purpose and scope of the Charter, applicable documents and guidance on use of 911 funds, the structure and operation of the Expenditure Review Committee, meetings and communications with PSAPs, and reporting to the Council on expenditure report review status.

Expenditure Review Committee (ERC) efforts have greatly improved PSAP expenditure reporting and resolution in 2021 and 2022. The Council has implemented procedures to meet the recommendation from the last audit that additional requirements were needed to ensure only allowable costs for integrated software packages – i.e., only the Computer Aided Dispatch function – are paid for with 911 funds and that the Council should request invoice copies to aid this evaluation. The Council has provided training on expenditure reporting at “Admin Day” meetings and PowerPoint presentation on the process is available as well. The Committee endeavors to provide updated FAQ answers regarding the process and maintains an Expenditure List of approved expenditures which is updated in “real time”. The ERC met weekly beginning in the first week of March to finalize and close the review process for each PSAP.

Annual report expenditure reviews are being closed much more promptly than in previous years, for example the 2022 review was largely concluded by June 2023.¹¹⁸ This is a very significant improvement over years past and is attributable to big staff effort to clear the backlog for prior years and stay on top of accomplishing the current year review, plus education efforts with the PSAPs regarding expenditure review and documentation paying off. In particular the North and South PSAP Liaisons stayed on top of the communications with PSAPs and updated the educational resources. Admittedly the review process for allowable expenditures can be confusing

¹¹⁶ K.S.A. 12-5375(a).

¹¹⁷ Kansas 911 Coordinating Council, “About Us”, <https://www.kansas911.org/about-us/>

¹¹⁸ Per the Liaison Report in the January 20, 2023 Council minutes at page 26: “expenditure review process ended much earlier in 2022 than in years past. 117 PSAPs had their reports completed and expenses reviewed within the year's first six months.”

to participate in without training and the North and South PSAP Liaisons took the time to educate. Also, staff turnover at the PSAPs causes a continuing support and education requirement for the new employees on the annual expenditure reviews.

The Council is appointing new members to the Expenditure Review Committee with one objective being to include more committee members with budgetary decision-making authority in their regular position, to bring the perspective of persons that are responsible for administering budgets to the review process. The Committee's role is being honed to strictly interpret the statute of the 911 Act, analyze the processes to make sure the Committee is compliant with Act, while remaining supportive of the PSAPs.

The improved results from the last review process suggest PSAPs have benefitted from training and communication efforts and adjusted well to the changes made to the 911 portal to streamline the reporting process. Council staff and PSAP staff have done well to reach the result that expenditures are timely reported with supporting documentation such that staff can make a timely review, ask and answer any questions with the PSAPs to determine whether any unallowable expenditures have been made. In this review, no PSAPs got letters that they were late with information, and there were no PSAP distribution funds withheld per the Act for failure to provide information. Finally, it should be noted that technology continues to change and in spite of the precedent of past decisions on what is allowable and what is not some level of judgment and interpretation has to be applied by the Committee and the Council.

Our Expenditure Review

We considered the changes and improvements made in the expenditure review process by the Council as described above. The Expenditure Review Committee provided the full documentation of PSAP expenditures that it received from the PSAPs via the Annual Reports. This full documentation was reviewed and evaluated for the most recent year – 2022. The documentation consists of 3213 pages of invoice details for *all* the PSAP expenditures with a spreadsheet summary created by the Committee for all those same expenditures listing each of approximately 4600 expenditures totaling \$23.5 million for 2022. In earlier years the Expenditure Review Committee further examined only five randomly selected expenditures from

a PSAPs array of expenditures. Now the Committee examines all expenditures, and we reviewed the full array of expenditures as well.

The Committee's expenditure review is well structured and designed. The spreadsheet codes each reported expenditure to one of the eight allowable uses under the Act and then considers based on the description of the expenditure and the supporting invoice whether it is an allowable expenditure. Committee comments and descriptions are included for each expenditure in the spreadsheet as well as the conclusion of the Committee whether the expenditure is allowable under the Act or not.

We reviewed the Committee's expenditure review spreadsheet and documentation for 2022. The Committee's review identified approximately \$64,000 for 13 expenditures (for items such as supplies, radio batteries, office equipment and office software renewals) as unallowable and \$58,000 of that were from one county for a single purchase that is not allowable under the Act (for road signs). The Committee comments and descriptions are explanatory of each expenditure. We have reviewed all the 2022 PSAP expenditures and supporting documentation provided by the Committee, including descriptions and follow-up. We did not identify any further expenditures which should be unallowable under the Act. **We agree with the Committee that its review demonstrated that PSAP expenditures were restricted to the allowable uses under the Act.**

2% Cap on Administrative Expenses

The Act provides that "All expenses related to the council shall be paid from the 911 operations fund. No more than 2.0% of the total receipts from providers and the department received by the LCPA shall be used to pay for administrative expenses of the council."¹¹⁹ The Council's financial statements and budgets show that administrative expenses are well within this limit:

¹¹⁹ K.S.A. 12-5364(j).

	2021	2022	2023
	Actual	Actual	Budget
Telcom Income	\$31,678,149	\$32,623,396	\$32,483,382
Prepay Fee Income (KDOR)	\$2,723,715	\$2,424,462	\$2,475,102
PSAP 911 Services Payments	\$4,016,566	\$4,750,474	\$4,808,000
	\$38,418,430	\$39,798,332	\$39,766,484
Total Council Admin Expenses	\$ 349,861	\$ 271,229	\$ 439,368
Administrative Expense Percentage	0.91%	0.68%	1.10%

The Council is clearly keeping a close eye on its expenses. The 2023 budgeted administrative expense percentage is higher than previous years due to inclusion of a budgeted amount for this LPA Audit which occurs once every five years.

Status of Findings and Recommendations from 2018 Performance Audit Report

- The previous report found the Council’s review of PSAP expenditures had adhered to the Act’s requirements but that additional requirement for expenditure reporting was needed to ensure only allowable costs for integrated software packages are paid for with 911 funds – i.e., only the Computer Aided Dispatch function – and that the Council should request invoice copies to aid this evaluation.¹²⁰ The Council agreed with this recommendation and incorporated it into the next expenditure review.¹²¹
- The previous report found that the Council had reasonably managed its budget against the 2.5% cap on Council expenditures (now 2.0%), and also had not made any expenditures outside those allowed by the Act.¹²²
- The previous report found significant line-item budget variances, in part offsetting, and recommended more accurate coding of expenses for better budgeting and budget

¹²⁰ 2018 Performance Audit of Kansas 911 System, at page 95.

¹²¹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at page 12.

¹²² 2018 Performance Audit of Kansas 911 System, at page 96.

reporting.¹²³ The Council agreed and is reworking its budgeting process to make these improvements.¹²⁴

Findings and Conclusions

The Council and its Expenditure Review Committee continue to improve the expenditure review process. The Council has provided extensive training to PSAPs on what are allowable expenditures for 911 fee funds under the Act including PowerPoint presentations and a continuously updated list of allowable expenditures currently up to five pages which PSAPs use as a reference. The 911 Portal created by DASC for expenditure reporting has been continuously improved and is well supported by both DASC and the North and South PSAP Liaisons. This training support is also very important given the high turnover of PSAP staff. PSAPs can use the pre-approval process before funds are spent on a PSAP item to know before spending whether the expenditure will be allowed which is useful in cases where there might be some questions.

The last ERC review in 2022 began immediately upon the Annual Report deadline with weekly meetings to review and close the review process for each PSAP. With this effort and attention by Council staff the review process was closed much earlier than in any previous year. The ERC and the Council did not have to send any letters to PSAPs trying to bring in late submissions and no PSAP distributions had to be withheld for failure to provide information. This is a great result and indicates the ERC and the PSAPs understand the eight defined allowable expenditures in the Act and the Council process such that the ERC can operate efficiently and quickly.

Despite the eight defined allowable expenditures listed in the Act and the growing list of allowed expenditures maintained by the Council on its website for PSAP reference, interpretations by the Expenditure Review Committee are unavoidable. A wide range of items are purchased by PSAPs that are necessary for PSAP operations which can make it difficult to have definitive listings applicable to any item purchased by a PSAP. The Council is addressing this via appointing new members to the Expenditure Review Committee with one objective being to

¹²³ 2018 Performance Audit of Kansas 911 System, at page 96.

¹²⁴ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Performance Audit Report, at pages 12.

include more committee members with budgetary decision-making authority in their regular position, to bring the perspective of persons that are responsible for administering budgets to the review process. The Committee’s role is being honed to strictly interpret the statute of the 911 Act, analyze the processes to make sure the Committee is compliant with Act, while remaining supportive of the PSAPs.

Adequacy of the Amount of Moneys Collected

Statutory Charge

The Act states “... the division of post audit shall conduct an audit of the 911 system to determine ... whether the amount of moneys collected pursuant to this act is adequate”.¹²⁵ To make this determination, the IFB requires us to determine projected annual revenue and expenditures for NG911 services for Kansas PSAPs. Based on this information we are then required to determine whether current funding levels appear to be adequate to complete migration to NG911 services and then maintain and support NG911 services including accessing ESInet call routing for Kansas PSAPs.¹²⁶

Adequacy of the Fee

It is important to note that in Kansas responsibility for funding 911 is divided between the State of Kansas and local government (cities and counties). Kansas’ most recent report to the FCC on fees and funding states that 16% of the total cost to support 911 in Kansas is covered by the state 911 fee and 84% is covered by local government general funds.¹²⁷ This proportional split is the result of the Act’s establishment of a) the level of the Kansas 911 fee (\$0.90); b) the distribution method for funding PSAPs; and, c) the allowable uses for Kansas 911 fee funds. City and county government units are presently covering most of the cost of the 911 system in Kansas. Federal grant funding is also received from time to time. Two grant projects were recently funded. The

¹²⁵ K.S.A. 12-5377(c)(2).

¹²⁶ 2023 911 System Audit IFB at 4.3.3.

¹²⁷ Kansas FCC 911 Fee Report, response to Question F3.

first project was a sub-grant program for Kansas PSAPs, which allocated a total of \$1,800,000 for PSAP equipment upgrades to NG911 compatible ancillary systems. The remaining \$959,782 was allocated towards a replacement mapping system for the Statewide NG911 call handling system. The grant was received in August of 2019 and funds expended in 2021 totaled \$672,808.¹²⁸

It is not unusual for states to divide fiscal responsibility between the state and local government entities. Table 16 of the FCC’s Fourteenth Annual Report to Congress¹²⁹ shows the state/local distribution of responsibility by state from the FCC’s data collection. Proportional contributions vary among the states ranging from 100% state funded (6 states) to all or mostly all funded by local government funded (14 states) with the remainder of reporting states falling somewhere in between. Kansas’ 911 fee is not intended to cover all 911 costs statewide – it is intended to cover “allowable expenditures” associated with the Statewide Hosted Call Handling system as defined in the Act. Accordingly, this is how we assessed the adequacy of the Kansas 911 fee – is it adequate to cover “allowable expenditures” under the Act?

While the Act created five funds only two of the funds have been active. Collections have remained relatively stable for those two funds.¹³⁰ Also, PSAPs are charged on a “per workstation” basis for use of the state NG911 Platform. 2021- and 2022-Income Statements for those accounts are provided at Appendices B and C.

Are these funds adequate to deploy, operate and sustain the “allowable expenditures” associated with the NG911 state platform? The Council has performed business case projections to address this question assuming continued operations but with roll out of further i3 NG911 capabilities while continuing to upgrade and update the NG911 system. The Council has cash and investments¹³¹ that has accumulated to fund investments in i3 future technology and capabilities as well as other costs under the State Fund and Operations Fund. Technology is expensive and we must

¹²⁸ *Id.*, response to Question F4a.

¹²⁹ Fourteenth Annual Report to Congress on State Collection and Distribution of 911 and Enhanced 911 Fees and Charges; submitted pursuant to Public Law No. 110-283, by the Federal Communications Commission, December 30, 2022. 911 Fee Reports and Reporting, <https://www.fcc.gov/general/911-fee-reports> (“Fourteenth Annual FCC 911 Fee Report”).

¹³⁰ Projections provided by Coordinating Council staff, which projections are conservative (flat).

¹³¹ Cash and investments totaling \$42.8 million per the Balance Sheet dated May 31, 2023, contained in Council package for August 25, 2023 Council Meeting. \$23,733,236 total cash balance plus \$19,027,727 investment account balance. Note that total cash and investments fluctuates monthly.

consider the Business Case Financial Projections to determine where and how these funds might be spent on expanding the capabilities of the Statewide Hosted Call Handling Platform.

Business Case Financial Projections Performed by the Council

The Council’s business case spreadsheet tool allows estimation and evaluation of projected annual revenue and expenses for the NG911 System. The business case tool provides financial projections for the 2023 – 2030 period for continued Council operations while updating and upgrading the NG911 system and implementing further “i3” NG911 capabilities. We reviewed the Business Case financial projections including i3 future capabilities with Council staff to independently assess the adequacy of funding for future system operations and deployments.

The Business Case financial projections project from actual 2022 revenues and expenditures, and use known and estimated items to project for 2023 – 2030.

Revenue categories are 911 fee revenue (from the \$0.90 fee), prepaid wireless fee revenue (from Department of Revenue collection of the 2.06% wireless fee), PSAP equipment payments from each PSAP, and interest income from investments. Projections of revenue from PSAPs (e.g., \$18,000 per workstation console) and contractual costs from AT&T for the Hosted System are stable going forward since no more PSAPs remain to be brought on the Kansas Statewide Hosted Call System outside the MARC region. The last PSAPs outside MARC were brought on to the Hosted System in October 2023 (Brown and Marshall counties).

Similarly, going forward AT&T contract costs for costs for the system *as currently configured* and PSAP equipment are expected to be stable since all PSAPs are on the system at contract prices. However, there may be some churn in connectivity costs (connecting PSAPs to the NG911 System), particularly in early years of the projection period, as transition from the Virtual Private Network to AT&T Switched Ethernet is completed. The Business Case also projects costs based on experience for GIS (DASC, ESRI, and periodically imaging the state), other contracts for LCPA and staff including expenses for vehicles and conferences, and various Council expenses for meetings and conferences.

The cost for projected i3 future capabilities is very substantial but difficult to ascertain since the costs in subsequent years are for capabilities that vendors have not yet announced. Staff uses its best estimates gleaned from their expertise serving on national association committees, discussions

with vendors where ballpark costs can be obtained, and leaven this with past experience with vendors. **These anticipated costs are significant – up to \$12 – \$14 million annually.** Funds from investment accounts will be used to pay for these features. Regarding the pace of deploying new i3 features, it will also be important for the Council to balance the number and timing of new features and capabilities that are deployed against what PSAP management/staff and Council staff can integrate into training and operations.

Also unknown is the cost of the system when the current contract with AT&T expires in September 2027. This is a material concern.

Council Fund Investment Policy and Funds Balances for System Deployments

The Council administers investment policies for the LCPA’s management of liquid assets (including cash and cash equivalents) held as investments by the Kansas 911 State Fund, 911 Operations Fund and 911 State Grant Fund. These liquid assets include the Council’s reserve funds for future investments (i.e., i3 deployments) contemplated by the Act as funds which “exceed 15% of the total receipts received by the LCPA from providers and the department over the prior three years”.¹³² This equals \$15.8 million computed from 2023 – 2025 projected wireline and wireless fee revenues. As of the Council’s last Board meeting on October 27th the Council’s liquid asset funds totaled approximately \$42.7 million.

The principal investment objective per Council policy is capital preservation with income level consistent with minimum capital risk and maintenance of liquidity. Prohibited transactions and investments are clearly stated in the policy (no investments in stocks, mutual funds, limited partnerships, margin purchases, private placements, commodities, real estate or hedge funds). The liquid assets are all in Intrust Bank in Wichita under a Security Agreement which pledges collateral to secure the amounts deposited more than the amount insured by Federal Deposit Insurance Corporation (FDIC). Under the Security Agreement, the pledged securities shall consist of one or more of the following: direct obligations of the US government or obligations which are insured by the US government, Kansas municipal bonds which have been refunded in

¹³² K.S.A. 12-5368(b)(2).

advance with funds placed in escrow, state of Kansas bonds, municipal general obligation or revenue bonds, and other similar listed securities.

The value of the pledged securities can fluctuate with changes in interest rates – if interest rates go up, the value of the pledged securities (at fixed interest rates) will go down, all else equal. Similarly, the value of the Council’s fixed rate investments will go down on paper with rising interest rates. But if the Council can hold its bonds to maturity the Council will receive face value.

We have reviewed the Security Agreement and the pledged securities and believe this arrangement reasonably protects the Council from risk of loss of its invested funds.

The Council’s Business Case plans these invested funds will be used over the next six years to fund required, essential, and beneficial added features and capabilities to the statewide hosted call handling system. Since the FCC appears likely to require IP transmission of 911 calls by a date certain the Council can plan IP-enabled i3 features and capabilities on the system with more certainty. Our review of the Council’s Business Case indicates available investments will be used down to the management reserve level (\$15.8 million) with the required and essential categories of i3 features and capabilities expenditures – the Council may or may not be able to afford the third category – beneficial features and capabilities. Inclusion of the third category of features – beneficial – is projected to deplete the management reserve level to zero.

The largest potential differences of priority here is that the PSAPs have placed high value and importance on CAD-to-CAD data sharing, while the Council has that feature categorized as “beneficial” rather than required or essential. However, it should be noted that the Lightning app which is coming soon may very well provide the desired CAD-to-CAD functionality. This needs to be communicated to the PSAPs for discussion and validation.

Similarly, the PSAPs place high value and importance on real time transcription of 911 calls while the Council has that feature characterized as “beneficial”. Finally, TRAINFO and Artificial Intelligence applications are potentially in this “beneficial” category as well. To decide whether to deploy these features in the “beneficial” category, over the next six years the Council will be balancing the actual costs of the new features and capabilities (not yet known), the priority of the various new features and capabilities (required, essential, or beneficial), and the need to maintain a minimum management reserve working level.

Future Grant Funding

The cost of a nationwide NG911 deployment has been studied and estimated to be between \$9.5 billion and \$12.7 billion.¹³³ Last year the Public Safety Next Generation 911 Coalition updated that estimate to \$15 billion to account for cost increases and increased spending on cybersecurity.¹³⁴

These estimates have been provided to Congress where policy makers are seeking to fund implementation of a comprehensive NG911 system that is interoperable across the country and includes strong cyber protections. This estimate was used by the House Energy and Commerce Committee in May 2023 to pass the Spectrum Auction Reauthorization Act¹³⁵ to reauthorize the FCC’s authority to conduct spectrum auctions for three years. Part of the proceeds from the spectrum auctions would provide \$14.8 billion to fund the next-generation 911 (NG911) platform across the country, a proportionate amount of which would be available for further Kansas NG911 deployment – a very large amount of grant funding when and if it passes.

However, these grant funds likely will not be made available to states which under Congress’s and the FCC’s policies are found to have improperly diverted 911 fee funds to other uses. Current state of Kansas 911 policies place 911 fee funds outside the state treasury and thus the Council has been able to save funds for upcoming i3 feature deployments and system upgrades without those funds being swept for other uses. The state of Kansas is therefore insulated by policy from being labeled as a “fee diverter” by the FCC and made ineligible for federal 911 and other grants.

PSAP Views on Adequacy of Funding

As stated above, on average local government pays 84% of the total cost of PSAPs – the 911 fee pays the remainder. As in many environments personnel costs are by far the largest category of expense. Since staffing costs are an unallowable expense under the Act local government general

¹³³ Next Generation 911 Cost Estimate: A Report to Congress, October 2018, submitted by the National Highway Traffic Safety Administration and the National Telecommunications and Information Administration.

¹³⁴ “Next Generation 9-1-1 Fact Sheet”, <https://ng-911coalition.org/next-generation-9-1-1-fact-or-fiction/>

¹³⁵ “H.R. 3565 — 118th Congress: Spectrum Auction Reauthorization Act of 2023.” www.GovTrack.us. 2023. <https://www.govtrack.us/congress/bills/118/hr3565> (viewed October 19, 2023)

funds cover all PSAP staffing costs. Furthermore, PSAPs indicate they are funding some allowable expenditures locally to conserve 911 funds for larger projects.

Also, the less densely populated rural counties have the minimum number of seats for telecommunicators – one or two. These smaller PSAPs throughout our stakeholder interviews expressed concern that the funding picture for their PSAPs is not getting better – it is getting worse. The Kansas 911 Fee Report passed on the view that “some PSAPs have stated that additional 911 fee funding is needed to alleviate pressure on general fund tax dollars. The need for increased funding varies from PSAP to PSAP”.¹³⁶ We note that in the final 2019 amendments to the Act that the minimum county payment was increased from \$50,000 to \$60,000 but the proposed increased fee was reduced from \$1.03 to \$0.90 by reducing the share of the fee allocated to PSAPs from \$0.79 to \$0.66.

However, many PSAPs indicate funding is inadequate from their perspective. While revenue from the 911 fee has stayed flat, most if not all PSAP costs have increased. PSAPs state they are seeing decreased ability to plan for future maintenance and equipment upgrades. Local jurisdictions are strongly constrained from increasing taxes to provide greater funding to PSAPs.

Exemplary of the views that PSAP funding is inadequate:

¹³⁶ Kansas FCC 911 Fee Report, page 22.

I hope this message finds you well. I would like to respectfully request a thorough reevaluation of the funding allocation designated for counties with populations below 10,000. It is essential to emphasize that my intent is not to propose an increase in the 911 tax; rather, I am advocating for a comprehensive examination of the existing distribution formula to determine its adequacy in covering the genuine 911 operational costs for counties with populations of 10,000 and below. Given the unique circumstances and specific needs of smaller counties, it is imperative that we ensure the allocation of resources aligns with the actual financial requirements for maintaining a fully functional 911 service. By conducting this assessment, we can establish a more equitable and realistic framework for funding distribution, ultimately enhancing the efficiency and effectiveness of our emergency response services. I kindly request that you consider initiating this review to ensure that our funding strategies are not only equitable but also optimized to meet the vital needs of our smaller counties. Your attention to this matter is greatly appreciated, and I look forward to the potential improvements that may result from this reevaluation. Thank you for your dedication to the well-being and safety of our communities.

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- Even though funding is adequate for the Council a 911 fee increase is needed at the local level as prices continue to increase. It's hard to convey the need in this survey. Small agencies could use more funding to help with the smaller budgets we have to deal with. We want to do more but it's difficult when navigating 911 Funding.
- "More Funding"
- Rural areas are struggling with staffing more than technology at this point.
- I feel that the Council needs to revisit the monies set aside for future improvements and provide distribution opportunities to PSAPs who could utilize that money to supplement projects on a local level. Most 911 fees distributed to centers only cover approximately 10% of the annual budget for the 911 Centers.
- Current funding is not adequate for most PSAP's. We need an increase in our "cut" of the 90 cents or an increase in the 90 cents.

- I would like to see the financials for the Council. It's not clear to me what their funding source is, how much they are allocated and where those funds go.

Furthermore, PSAPs are aware of the liquid assets fund balances (approximately \$42.7 million as of the last Council meeting in October) on the Council's balance sheet and this likely fuels a view that some of these funds should be distributed back to PSAPs. Our observation is that there could be more clarity in communications that the Council has these funds earmarked in the Business Case to pay for i3 features and capabilities in the near to medium future and that these funds in part comprise the management reserve fund contemplated in K.S.A. 12-5368(b)(2). Just the same the current need for additional funds to the PSAPs is real and the Council could consider distribution of some portion of liquid asset funds back to the PSAPs to help reduce cost and budget pressures.

However, over a longer-term consolidation of smaller PSAPs is also an alternative to increasing funding to smaller PSAPs. It was clearly expressed in our interviews with stakeholders that smaller PSAPs have funding challenges for both equipment and operations/staffing. The staffing challenges are related to low pay, which in turn is related to city or county salary and wage levels limited by budget pressures. Several PSAPs have conducted wage and salary surveys to identify market pay levels but some are unable to persuade city councils and county commissioners to increase wages to a level necessary to attract jobseekers. We heard references to PSAP telecommunicator pay levels at half the wage paid for working at McDonalds. While it is understandable that city councils and county commissioners may be reluctant to raise wages to levels sufficient to attract jobseekers due to public resistance to taxes the result of not doing so is predictable – staffing shortages at PSAPs that make working conditions worse for staff that remain there.

The Council could consider all these factors to evaluate within the business case whether some portion of the existing fund balances could be distributed back to the PSAPs or whether retaining all liquid asset funds is required for future contracts and further feature roll out.

Potential Interconnection Costs per the FCC's Network Transition NPRM

The Business Case anticipates potentially using Council liquid asset fund balances to mitigate increased connectivity costs from the FCC's Network Transition NPRM. As described above the

NPRM proposed rules if adopted will require all telecommunications providers to deliver 911 calls in IP format over the ESInet to the 911 chosen interconnection point. Under the FCC NPRM as a default (in the absence of a different agreement) the FCC requires the telecommunications providers to bear the costs of constructing and operating necessary facilities to transmit 911 calls in IP format to the designated interconnection points, all by a date certain triggered by the 911 authority. These construction costs do not depend on the number of residents of the exchange being served by the PSAP – connectivity costs will be the same regardless of whether there are 100 residents being provided emergency communications services or 10,000 residents. Construction costs will vary by distance (longer fiber routes will cost more than shorter routes) and terrain/geography (fiber placement in rocky areas is much more costly than trenching in soil). As a result, the smaller the population of the PSAP community being served the more infeasible it would be to recover the connectivity costs from a monthly surcharge and the greater the burden on the service provider under the FCC default cost recovery mechanism of “the service provider pays”.

It is unknown when the FCC will make a final decision on this matter, and when the date certain will be for telecommunications providers to construct or arrange for these facilities, and it is also unknown what the costs for providers to do so will be, in Kansas and elsewhere. Different network architectures are possible each with its own cost and operational profile. Rural local exchange companies in Kansas will be significantly impacted by this requirement and are evaluating a centralized solution using the Kansas Fiber Network (KFN). A not-to-exceed estimate of the monthly cost of this option to the Council for all rural telephone companies is \$5,950 per month and could be lower depending on how the configuration results.¹³⁷ The Council will need to evaluate any cost estimates once the FCC rules are finalized and consider options at that point including whether or not to use Council funds to mitigate the costs of those connections or rely on some other cost recovery mechanism under the FCC decision.

¹³⁷ Council Minutes, August 25, 2023 Council meeting, at page 13.

Status of Findings and Recommendations from 2018 Performance Audit Report

- The previous report recommended the LCPA work with the Kansas Corporation Commission to review and compare the list of service providers paying 911 fees administered by the LCPA, the list of service providers paying KUSF assessments administered by the KCC, and service providers registered by the FCC Form 499 as operating in Kansas and contact those indicated to be operating in Kansas but not paying the 911 fees.¹³⁸ The Council stated it agreed and would attempt to implement but identifying contact information and providers may be difficult.¹³⁹ We explored this subject in our meeting with the LCPA for this engagement and the LCPA did meet and confer with the KCC on this subject and has maintained ongoing communications with the KCC.
- The previous report found that the \$0.60 per account 911 fee was not adequate to deploy, operate and sustain the Kansas NG911 state platform, and recommended a fee increase (\$1.05) to the Kansas Legislature¹⁴⁰ with \$0.22 of that fee directed to deployment and sustainment funding. The Council recommended a fee of \$1.03 with \$0.23 directed to the Council's deployment and sustainment funding with the remainder going to PSAPs resulting in \$7 million increased funding.¹⁴¹
- The previous report found that it was necessary to support a deployment and sustainability fund for further deployment of i3 capabilities and ongoing operation of the NG911 platform at a level up to 15% of annual fee receipts.¹⁴² The Council stated it would present proposed legislation in the 2019 session to implement this concept and the

¹³⁸ 2018 Report, at page 96.

¹³⁹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Report, at pages 12.

¹⁴⁰ 2018 Report, at page 97.

¹⁴¹ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Report, at pages 12.

¹⁴² 2018 Report, at page 98.

concept was included in amendments to the Act adopted in the 2019 session of the Kansas Legislature.¹⁴³

Findings and Conclusions

We review the adequacy of funding from two perspectives: the question under the Act is are the funds from the Act's 911 fees adequate to cover the allowable costs and then the further question from a PSAP's perspective is are funds available to the PSAPs (total of local funds and Council distributions) in total adequate to cover PSAP operating costs. On average, the 911 fees cover 16% of PSAP operating costs while local government general funds cover the remaining 84% of PSAP operating costs. As in many environments personnel costs are by far the largest category of expense. Since staffing costs are an unallowable expense under the Act local government general funds cover all PSAP staffing costs. Furthermore, PSAPs indicate they are funding some allowable expenditures locally to conserve 911 funds for larger projects.

Council staff has performed Business Case financial projections to evaluate adequacy of funding for the State Hosted Call Handling system. These financial projections begin with actual 2022 financial results and assume continued operations but with roll out of further i3 NG911 capabilities while continuing to upgrade and update the NG911 system, through 2030. The financial projections include flat revenues (no fee or revenue increase) which is the historic trend, so we consider it to be a conservative assumption. The financial projections for the expense side are a combination of contractual expenses and distribution of funds to PSAP which can be projected relatively easily, and estimated expenses Council and staff conferences, meetings and other costs.

We find that the Council's Business Case projections are reasonably calculated and performed. The Council has based the cost and expense projections on actual expenditure experience. Many of these expenses are contractual or otherwise have been stable and predictable. Fee revenues are conservatively projected as being flat. Given the assumptions used in the Business Case the current fee level of \$0.90 per subscriber account is adequate to sustain and maintain the

¹⁴³ Council Letter offering additional clarifying information, December 4, 2018, appended to the 2018 Report, at pages 13.

statewide NG911 platform going forward through the implementation of future i3 features and capabilities contained in the Business Case. However, we do not have any visibility into the details of the cost estimates for the future i3 features and capabilities since the details must be held “close to the vest” given bidding and procurement considerations.

The Business Case financial projections show that the current 911 fees are adequate to continue with NG911 system upgrades and enhancements to include i3 features and capabilities using reserve funds saved by the Council. Estimates for the annual costs of i3 features and capabilities from 2023 to 2030 are \$12 - \$14 million annually for all three categories of i3 features (mandatory, essential and beneficial). This also includes potentially paying a portion of the interconnection costs for smaller jurisdictions caused by the FCC NPRM. If in fact all three categories of i3 features are implemented and cost estimates are accurate the Council will have spent all its reserve funds – which is not a tenable position. So, there will likely have to be some economizing among the category 3 “beneficial” features.

The Council has some options for more revenue beyond requesting an increase in 911 fees, such as increasing the workstation charge from the present \$18,000 annual charge since that charge has not increased from the system’s inception in 2015. However, that would increase costs to PSAPs.

However, many PSAPs indicate **funding is inadequate** from a PSAP perspective. Revenue from the 911 fee has stayed flat, but most if not all PSAP costs have increased. PSAPs state they are seeing decreased ability to plan for future maintenance and equipment upgrades. Local jurisdictions are strongly constrained from increasing taxes to provide greater funding to PSAPs. Some PSAPs are considering consolidation which is a reasonable response, but the Act is not entirely clear on how PSAP distribution of funds is handled after consolidation. We believe it would be in harmony with the Act to continue to provide the PSAP distribution to entities which consolidate but with continued obligation for annual expenditure review demonstrating that the 911 fee funds were used for approved purposes.

Issues For Further Consideration

The Council and the Legislature may wish to consider the following issues:

- If the Legislature considers amendments to the Act the following items could be addressed:
 - Clarify the Act regarding “distribution to PSAPs” and “distribution to counties” as it would apply to consolidating PSAPs to allow continued distributions to consolidating jurisdictions subject to a continuing obligation to demonstrate 911 funds were spent on statutorily allowed expenditures.
 - Increasing the minimum distribution to counties from \$60,000 to a greater amount.
- There is a significant need for more transparent and greater communication between the Council and the PSAPs regarding the Council’s investment account balances. The Council’s planned use of these reserves and the projections that they will be fully utilized to upgrade and enhance the NG911 system is not broadly understood by the PSAPs and creates concerns among the PSAPs that are in daily struggles with limited budgets. The Council could consider a “road show” or similar communication with PSAPs regarding what are the planned upgrade and feature deployments and their costs to allay concerns over Council stewardship over these funds on behalf of the state public safety community.
- The Council plans continuing communication with the PSAPs regarding the function and utility of the Lightning app that is in development. This is especially important to get PSAP feedback on the extent to which the Lightning app can provide “the same” functionality as the CAD-to-CAD data sharing that PSAPs have expressed priority interest in. While it is still early days in terms of development of the Lightning app it has gained a high profile and priority at the Council and it is not too early for robust communication of the Lightning app’s anticipated benefits and user base to PSAPs and other interested entities.
- The PSAP survey demonstrated that PSAPs have definite views of which upcoming i3 features are of most interest and use to them. Especially now that the FCC NPRM lends greater certainty regarding the timing of i3 features and capabilities the Council and staff could broaden and deepen communication with PSAPs on the priority of “beneficial” applications, like CAD-to-CAD data sharing, real time transcription, and TRAINFO.

- Given the importance of the Business Case financial projections the Council should adopt a structured annual review process which compares the year's financial projection in the Business Case to actual expenditures for that year. Material variances between actual revenues and expenditures for that year and projected Business Case revenues and expenditures should be carefully reviewed for the reasons for the variances which can be used for rolling annual revisions to the Business Case financial projections if warranted.

This concludes this 2023 NG911 system audit report.

Appendix A: Council Membership

<u>Voting Members, Appointed by the Governor</u>	<u>Appointment Ends</u>
Chairman (non-voting), Kansas 911 Coordinating Council	
Troy Briggs, Sheriff, Haskell County	
One member representing Information Technology personnel from government units	
Jacqueline Brown, IT, Riley County Police Department	6/30/2020
Vacant	6/30/2024
One member representing the Kansas Sheriff's Association	
Vacant	6/30/2026
One member representing the Kansas Association of Chiefs of Police	
Jerry Harrison, Chief of Police, City of Independence	6/30/2025
One member representing a Fire Chief (Fire Chief Association)	
Scott Hilbrink, Assistant Fire Chief, City of Colby	6/30/2026
One member representing Kansas Chapter of APCO	
Becky Snook, Director, Mitchell County	6/30/2021
One member recommended by the Adjutant General	
Jonathan York, Branch Director, Kansas Department of Emergency Management	6/30/2026
One member recommended by the Kansas Emergency Medical Services Board	
Brandon Beck, Fire Chief, City of Emporia	6/30/2024
One member recommended by the Kansas Commission for the Deaf and Hard of Hearing	
Catherine Macfee, Kansas Commission for the Deaf and Hard of Hearing	6/30/2025
Two members representing PSAPs located in counties with less than 75,000 population	
Eric Harper, Director, Cheyenne County 911	6/30/2026
Krista Amaro, 911 Director, Kiowa County	6/30/2024
Two members representing PSAPs located in counties with more than 75,000 population	
Tony Foster, Director, Douglas County Emergency Communications	6/30/2025
Jeremy Rabb, 911 Director, Shawnee County	6/30/2026

Kansas Legislative members

- Rick Billinger, Kansas Senator, Republican
- Marci Francisco, Kansas Senator, Democrat
- Kyle Hoffman, Kansas Representative, Republican
- John Carmichael, Kansas Representative, Democrat

Non-Voting Members, Appointed by the Governor

Appointment
Ends

One member representing Kansas Rural Independent Telephone Companies

Rob McDonald, Operations Manager, MT Networks 6/30/2026

One member representing local exchange carriers

Vacant 6/30/2026

One member representing large wireless providers

Patrick Fucik, Manager, Wireless 911 Implementation, T-Mobile 6/30/2023

One member representing VoIP providers

Mark Tucker, Cox Communications 6/30/2024

One member recommended by the League of Kansas Municipalities

Vacant 6/30/2026

One member recommended by the Kansas Association of Counties

Jerry Daniels, County Commissioner, Allen County 6/30/2026

One member recommended by the Kansas Geographic Information Systems policy Board

Ken Nelson, Kansas Geological Survey 6/30/2024

One member recommended by the Kansas Office of Information Technology Services

Sara Spinks, Director Network and Telecommunications Services, KS OITS 6/30/2022

One member recommended by the Mid-America Regional Council

Michael Daniels, Public Safety Administrative Manager, MARC 6/30/2026

One Member Representing Non-Traditional PSAPs

Elizabeth Phillips, Assistant Director, University of Kansas Public Safety 6/30/2025

One member Representing Non-Traditional PSAPs

Terry Clark, Chief of Police, Potawatomi Tribal Police 6/30/2025

Appendix B: 2022 Income Statements for State Fund (PSAP distributions) and Consolidated Funds

**Kansas 911 Coordinating Council
Summary
For the Twelve Months Ending Saturday, December 31, 2022**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Revenue					
Telcom Income	\$2,641,949.02	\$2,634,333.37	\$32,623,395.94	\$31,612,000.00	(\$1,011,395.94)
Prepay Fee Income	194,081.12	188,584.50	2,424,461.54	2,263,014.00	(161,447.54)
PSAP 911 Services Payments	391,467.05	391,666.63	4,750,474.12	4,700,000.00	(50,474.12)
Grant Income	0.00	0.00	40,986.57	0.00	(40,986.57)
Interest Income	74,690.42	1,250.00	345,748.41	15,000.00	(330,748.41)
Total Revenue	\$3,302,187.61	\$3,215,834.50	\$40,185,066.58	\$38,590,014.00	(\$1,595,052.58)
PSAP Expenses					
PSAP Payments	1,795,704.77	1,708,333.37	21,040,290.64	20,500,000.00	(540,290.64)
PSAP Minimum Quarterly Payments	91,054.72	137,500.00	1,221,420.97	1,650,000.00	428,579.03
Total PSAP Expenses	\$1,886,759.49	\$1,845,833.37	\$22,261,711.61	\$22,150,000.00	(\$111,711.61)
Operating Expenses					
<i>Contract Labor</i>	<i>12,432.42</i>	<i>12,432.38</i>	<i>149,189.04</i>	<i>149,189.00</i>	<i>(0.04)</i>
<i>Telephone</i>	<i>0.00</i>	<i>250.00</i>	<i>0.00</i>	<i>3,000.00</i>	<i>3,000.00</i>
<i>Conference Expense - Admin</i>	<i>0.00</i>	<i>500.00</i>	<i>866.96</i>	<i>6,000.00</i>	<i>5,133.04</i>
<i>Conference & Training</i>	<i>0.00</i>	<i>416.63</i>	<i>538.96</i>	<i>5,000.00</i>	<i>4,461.04</i>
<i>Conference Registrations</i>	<i>0.00</i>	<i>62.50</i>	<i>328.00</i>	<i>750.00</i>	<i>422.00</i>
<i>Other Conference Expense</i>	<i>0.00</i>	<i>20.87</i>	<i>0.00</i>	<i>250.00</i>	<i>250.00</i>
<i>Travel Expense</i>	<i>138.27</i>	<i>666.63</i>	<i>4,495.18</i>	<i>8,000.00</i>	<i>3,504.82</i>
<i>Vehicle Fuel</i>	<i>26.42</i>	<i>225.00</i>	<i>1,450.06</i>	<i>2,700.00</i>	<i>1,249.94</i>
<i>Vehicle Insurance & Registration</i>	<i>0.00</i>	<i>333.37</i>	<i>3,006.91</i>	<i>4,000.00</i>	<i>993.09</i>
<i>Vehicle Repairs & Maintenance</i>	<i>156.31</i>	<i>62.50</i>	<i>226.20</i>	<i>750.00</i>	<i>523.80</i>
Personnel Contracts	12,753.42	14,469.88	159,234.35	173,639.00	14,404.65
<i>Legislative Pay</i>	<i>1,191.40</i>	<i>625.00</i>	<i>1,728.73</i>	<i>7,500.00</i>	<i>5,771.27</i>
<i>Interpreters for Meetings</i>	<i>0.00</i>	<i>100.00</i>	<i>775.75</i>	<i>1,200.00</i>	<i>424.25</i>
<i>Meeting Expenses - Council</i>	<i>0.00</i>	<i>41.63</i>	<i>0.00</i>	<i>500.00</i>	<i>500.00</i>
<i>Conference Call Service</i>	<i>32.55</i>	<i>116.63</i>	<i>1,607.97</i>	<i>1,400.00</i>	<i>(207.97)</i>
<i>Travel & Meals</i>	<i>0.00</i>	<i>416.63</i>	<i>7,278.61</i>	<i>5,000.00</i>	<i>(2,278.61)</i>
Council Meeting Expenses	1,223.95	1,299.89	11,391.06	15,600.00	4,208.94
<i>GIS Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>531.26</i>	<i>1,000.00</i>	<i>468.74</i>
<i>Operations Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>3,755.91</i>	<i>1,000.00</i>	<i>(2,755.91)</i>
<i>Technical/Security Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Training Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Committee Meeting Expenses	0.00	333.48	4,287.17	4,000.00	(287.17)
<i>Audit Fees</i>	6,385.00	833.37	32,520.00	10,000.00	(22,520.00)
<i>State Registration Fees</i>	0.00	41.63	0.00	500.00	500.00
<i>Bank Fees</i>	269.82	350.00	3,331.68	4,200.00	868.32
<i>PM Contract - Council Admin</i>	0.00	3,120.00	23,105.94	37,440.00	14,334.06
<i>Public Relations</i>	0.00	250.00	0.00	3,000.00	3,000.00
<i>Membership Dues</i>	0.00	125.00	992.00	1,500.00	508.00
<i>Travel & Meals</i>	0.00	0.00	2,147.93	0.00	(2,147.93)
<i>Travel & Meals</i>	0.00	125.00	0.00	1,500.00	1,500.00
<i>National Conferences</i>	0.00	0.00	253.00	0.00	(253.00)
<i>Registrations</i>	0.00	320.87	1,655.00	3,850.00	2,195.00
<i>Travel & Meals</i>	0.00	1,250.00	10,027.60	15,000.00	4,972.40
<i>Other National Conference Expenses</i>	0.00	41.63	372.61	500.00	127.39
<i>Website Maintenance</i>	0.00	625.00	1,325.00	7,500.00	6,175.00
Other Administrative Costs	6,654.82	7,082.50	75,730.76	84,990.00	9,259.24
Total Operating Expenses	\$20,632.19	\$23,185.75	\$250,643.34	\$278,229.00	\$27,585.66

Contractual Costs

<i>AT&T - AVPN Access</i>	91,955.35	100,000.00	1,109,339.08	1,200,000.00	90,660.92
<i>AT&T - POTS Router Circuits</i>	4,050.92	4,020.87	48,228.59	48,250.00	21.41
<i>AT&T - Call Handling</i>	170,997.63	165,833.37	2,051,971.56	1,990,000.00	(61,971.56)
<i>AT&T - AVPN Ports</i>	44,573.60	41,666.63	534,822.14	500,000.00	(34,822.14)
<i>AT&T - T1 Backup Circuits</i>	250.74	250.00	3,003.48	3,000.00	(3.48)
<i>AT&T - Service Manager</i>	16,220.00	16,250.00	193,003.00	195,000.00	1,997.00
<i>AT&T Mobility - LTE Backup Circuits</i>	4,580.64	4,650.00	59,942.91	55,800.00	(4,142.91)
<i>AT&T - TCC Services</i>	13,002.50	16,666.63	156,030.00	200,000.00	43,970.00
<i>AT&T - ESI Net Services</i>	240,669.07	326,666.63	3,524,934.23	3,920,000.00	395,065.77
<i>AT&T - Rapid Deploy</i>	71,804.00	125,000.00	861,648.00	1,500,000.00	638,352.00
<i>AT&T Legacy Connection Charges</i>	14,038.10	14,583.37	168,230.43	175,000.00	6,769.57
<i>AT&T - NBFW</i>	4,853.55	5,000.00	63,076.15	60,000.00	(3,076.15)
<i>AT&T - Security</i>	0.00	833.37	0.00	10,000.00	10,000.00
AT&T Service Contracts	676,996.10	821,420.87	8,774,229.57	9,857,050.00	1,082,820.43
LCPA Contract	12,280.17	12,280.13	147,344.25	147,362.00	17.75
Non-Admin. Contract Staff					
<i>Contract Labor</i>	27,997.66	26,687.50	321,070.52	320,250.00	(820.52)
<i>Office Supplies</i>	239.30	0.00	1,069.58	0.00	(1,069.58)
<i>Telephone</i>	241.92	0.00	1,694.32	0.00	(1,694.32)
<i>Conference Expense - Staff</i>	0.00	1,666.63	5,129.93	20,000.00	14,870.07
<i>Conference & Training</i>	0.00	0.00	3,172.49	0.00	(3,172.49)
<i>Conference Registrations</i>	0.00	1,666.63	1,579.44	20,000.00	18,420.56

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
<i>Travel & Meals - Conferences</i>	0.00	0.00	378.00	0.00	(378.00)
<i>Travel Expense</i>	596.10	2,916.63	7,996.53	35,000.00	27,003.47
<i>Vehicle Expense</i>	0.00	0.00	175.44	0.00	(175.44)
<i>Vehicle Fuel</i>	19.14	775.00	2,493.67	9,300.00	6,806.33
<i>Vehicle Insurance & Registration</i>	0.00	1,000.00	9,188.69	12,000.00	2,811.31
<i>Vehicle Repairs & Maintenance</i>	0.00	187.50	237.95	2,250.00	2,012.05
Non-Admin. Contract Staff Expenses	29,094.12	33,233.26	349,056.63	398,800.00	49,743.37
<i>Legal Representation</i>	587.10	3,750.00	7,261.50	45,000.00	37,738.50
<i>ITSS Contract</i>	32,640.00	17,000.00	209,948.73	204,000.00	(5,948.73)
<i>PM Contract</i>	7,740.00	12,480.00	110,963.80	149,760.00	38,796.20
<i>Imagery Contract</i>	0.00	0.00	129,150.00	0.00	(129,150.00)
<i>DASC Contract</i>	125,000.00	20,833.37	375,432.71	250,000.00	(125,432.71)
<i>Dickinson County Contract</i>	130,228.61	4,895.12	190,438.83	58,741.00	(131,697.83)
<i>Public Relations</i>	0.00	1,000.00	772.73	12,000.00	11,227.27
<i>Training - Admin Fall Conference</i>	0.00	2,083.37	15,766.70	25,000.00	9,233.30
<i>Onsite Training - EMTDC</i>	0.00	533.37	0.00	6,400.00	6,400.00
<i>EMTDC Deployment Costs</i>	0.00	666.63	0.00	8,000.00	8,000.00
<i>Technical Supplies and Equipment</i>	244.89	3,333.37	2,218.92	40,000.00	37,781.08
<i>Learning Management System</i>	14,700.00	1,433.37	32,950.00	17,200.00	(15,750.00)
<i>Esri ELAContract (KS OITIS)</i>	0.00	2,723.37	32,648.00	32,680.00	32.00
Other Contract Costs	311,140.60	70,731.97	1,107,551.92	848,781.00	(258,770.92)
<i>Hardware</i>	0.00	0.00	9,980.40	0.00	(9,980.40)
<i>Software</i>	0.00	0.00	40,986.57	0.00	(40,986.57)
Grant Expenses	0.00	0.00	50,966.97	0.00	(50,966.97)
Total Contractual Costs	\$1,029,510.99	\$937,666.23	\$10,429,149.34	\$11,251,993.00	\$822,843.66
Total Expenses	2,936,902.67	2,806,685.35	32,941,504.29	33,680,222.00	738,717.71
Other Income					
Investment Interest/Dividends	15,776.17	0.00	254,452.29	0.00	(254,452.29)
Gain/Loss on Investment	(24,819.09)	0.00	(720,896.92)	0.00	720,896.92
Total Other Income	(\$9,042.92)	\$0.00	(\$466,444.63)	\$0.00	\$466,444.63
Other Expense					
Investment Fees	4,643.68	0.00	58,236.53	0.00	(58,236.53)
Total Other Expense	\$4,643.68	\$0.00	\$58,236.53	\$0.00	(\$58,236.53)

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Net Other Income and Expense	(\$13,686.60)	\$0.00	(\$524,681.16)	\$0.00	\$524,681.16
Net Change in Net Assets	\$351,598.34	\$409,149.15	\$6,718,881.13	\$4,909,792.00	(\$1,809,089.13)

Operating Expense Percentage

0.62%

**Kansas 911 Coordinating Council
911 State Fund
For the Twelve Months Ending Saturday, December 31, 2022**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Revenue					
Telcom Income	\$1,191,668.86	\$2,634,333.37	\$23,848,160.44	\$31,612,000.00	\$7,763,839.56
Interest Income	22,941.18	625.00	104,292.02	7,500.00	(96,792.02)
Total Revenue	\$1,214,610.04	\$2,634,958.37	\$23,952,452.46	\$31,619,500.00	\$7,667,047.54
PSAP Expenses					
PSAP Payments	1,795,704.77	1,708,333.37	21,040,290.64	20,500,000.00	(540,290.64)
PSAP Minimum Quarterly Payments	91,054.72	137,500.00	1,221,420.97	1,650,000.00	428,579.03
Total PSAP Expenses	\$1,886,759.49	\$1,845,833.37	\$22,261,711.61	\$22,150,000.00	(\$111,711.61)
Operating Expenses					
<i>Bank Fees</i>	<i>269.82</i>	<i>175.00</i>	<i>3,130.99</i>	<i>2,100.00</i>	<i>(1,030.99)</i>
Other Administrative Costs	269.82	175.00	3,130.99	2,100.00	(1,030.99)
Total Operating Expenses	\$269.82	\$175.00	\$3,130.99	\$2,100.00	(\$1,030.99)
Total Expenses	1,887,029.31	1,846,008.37	22,264,842.60	22,152,100.00	(112,742.60)
Other Income					
Investment Interest/Dividends	3,373.29	0.00	56,291.18	0.00	(56,291.18)
Gain/Loss on Investment	(5,712.98)	0.00	(163,394.29)	0.00	163,394.29
Total Other Income	(\$2,339.69)	\$0.00	(\$107,103.11)	\$0.00	\$107,103.11
Other Expense					
Investment Fees	1,132.14	0.00	13,862.72	0.00	(13,862.72)
Total Other Expense	\$1,132.14	\$0.00	\$13,862.72	\$0.00	(\$13,862.72)
Net Other Income and Expense	(\$3,471.83)	\$0.00	(\$120,965.83)	\$0.00	\$120,965.83
Net Change in Net Assets	(\$675,891.10)	\$788,950.00	\$1,566,644.03	\$9,467,400.00	\$7,900,755.97

**Kansas 911 Coordinating Council
911 Operations Fund
For the Twelve Months Ending Saturday, December 31, 2022**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Revenue					
Telcom Income	\$1,390,014.95	\$0.00	\$8,410,571.74	\$0.00	(\$8,410,571.74)
Prepay Fee Income	194,081.12	188,584.50	2,424,461.54	2,263,014.00	(161,447.54)
PSAP 911 Services Payments	391,467.05	391,666.63	4,750,474.12	4,700,000.00	(50,474.12)
Grant Income	0.00	0.00	40,986.57	0.00	(40,986.57)
Interest Income	48,402.60	625.00	226,696.92	7,500.00	(219,196.92)
Total Revenue	\$2,023,965.72	\$580,876.13	\$15,853,190.89	\$6,970,514.00	(\$8,882,676.89)
Operating Expenses					
<i>Contract Labor</i>	<i>12,432.42</i>	<i>12,432.38</i>	<i>149,189.04</i>	<i>149,189.00</i>	<i>(0.04)</i>
<i>Telephone</i>	<i>0.00</i>	<i>250.00</i>	<i>0.00</i>	<i>3,000.00</i>	<i>3,000.00</i>
<i>Conference Expense - Admin</i>	<i>0.00</i>	<i>500.00</i>	<i>866.96</i>	<i>6,000.00</i>	<i>5,133.04</i>
<i>Conference & Training</i>	<i>0.00</i>	<i>416.63</i>	<i>538.96</i>	<i>5,000.00</i>	<i>4,461.04</i>
<i>Conference Registrations</i>	<i>0.00</i>	<i>62.50</i>	<i>328.00</i>	<i>750.00</i>	<i>422.00</i>
<i>Other Conference Expense</i>	<i>0.00</i>	<i>20.87</i>	<i>0.00</i>	<i>250.00</i>	<i>250.00</i>
<i>Travel Expense</i>	<i>138.27</i>	<i>666.63</i>	<i>4,495.18</i>	<i>8,000.00</i>	<i>3,504.82</i>
<i>Vehicle Fuel</i>	<i>26.42</i>	<i>225.00</i>	<i>1,450.06</i>	<i>2,700.00</i>	<i>1,249.94</i>
<i>Vehicle Insurance & Registration</i>	<i>0.00</i>	<i>333.37</i>	<i>3,006.91</i>	<i>4,000.00</i>	<i>993.09</i>
<i>Vehicle Repairs & Maintenance</i>	<i>156.31</i>	<i>62.50</i>	<i>226.20</i>	<i>750.00</i>	<i>523.80</i>
Personnel Contracts	12,753.42	14,469.88	159,234.35	173,639.00	14,404.65
<i>Legislative Pay</i>	<i>1,191.40</i>	<i>625.00</i>	<i>1,728.73</i>	<i>7,500.00</i>	<i>5,771.27</i>
<i>Interpreters for Meetings</i>	<i>0.00</i>	<i>100.00</i>	<i>775.75</i>	<i>1,200.00</i>	<i>424.25</i>
<i>Meeting Expenses - Council</i>	<i>0.00</i>	<i>41.63</i>	<i>0.00</i>	<i>500.00</i>	<i>500.00</i>
<i>Conference Call Service</i>	<i>32.55</i>	<i>116.63</i>	<i>1,607.97</i>	<i>1,400.00</i>	<i>(207.97)</i>
<i>Travel & Meals</i>	<i>0.00</i>	<i>416.63</i>	<i>7,278.61</i>	<i>5,000.00</i>	<i>(2,278.61)</i>
Council Meeting Expenses	1,223.95	1,299.89	11,391.06	15,600.00	4,208.94
<i>GIS Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>531.26</i>	<i>1,000.00</i>	<i>468.74</i>
<i>Operations Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>3,755.91</i>	<i>1,000.00</i>	<i>(2,755.91)</i>
<i>Technical/Security Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Training Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
Committee Meeting Expenses	0.00	333.48	4,287.17	4,000.00	(287.17)
<i>Audit Fees</i>	<i>6,385.00</i>	<i>833.37</i>	<i>32,520.00</i>	<i>10,000.00</i>	<i>(22,520.00)</i>
<i>State Registration Fees</i>	<i>0.00</i>	<i>41.63</i>	<i>0.00</i>	<i>500.00</i>	<i>500.00</i>
<i>Bank Fees</i>	<i>0.00</i>	<i>175.00</i>	<i>200.69</i>	<i>2,100.00</i>	<i>1,899.31</i>
<i>PM Contract - Council Admin</i>	<i>0.00</i>	<i>3,120.00</i>	<i>23,105.94</i>	<i>37,440.00</i>	<i>14,334.06</i>
<i>Public Relations</i>	<i>0.00</i>	<i>250.00</i>	<i>0.00</i>	<i>3,000.00</i>	<i>3,000.00</i>

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Membership Dues	0.00	125.00	992.00	1,500.00	508.00
Travel & Meals	0.00	0.00	2,147.93	0.00	(2,147.93)
Travel & Meals	0.00	125.00	0.00	1,500.00	1,500.00
National Conferences	0.00	0.00	253.00	0.00	(253.00)
Registrations	0.00	320.87	1,655.00	3,850.00	2,195.00
Travel & Meals	0.00	1,250.00	10,027.60	15,000.00	4,972.40
Other National Conference Expenses	0.00	41.63	372.61	500.00	127.39
Website Maintenance	0.00	625.00	1,325.00	7,500.00	6,175.00
Other Administrative Costs	6,385.00	6,907.50	72,599.77	82,890.00	10,290.23
Total Operating Expenses	\$20,362.37	\$23,010.75	\$247,512.35	\$276,129.00	\$28,616.65

Contractual Costs

AT&T - AVPN Access	91,955.35	100,000.00	1,109,339.08	1,200,000.00	90,660.92
AT&T - POTS Router Circuits	4,050.92	4,020.87	48,228.59	48,250.00	21.41
AT&T - Call Handling	170,997.63	165,833.37	2,051,971.56	1,990,000.00	(61,971.56)
AT&T - AVPN Ports	44,573.60	41,666.63	534,822.14	500,000.00	(34,822.14)
AT&T - T1 Backup Circuits	250.74	250.00	3,003.48	3,000.00	(3.48)
AT&T - Service Manager	16,220.00	16,250.00	193,003.00	195,000.00	1,997.00
AT&T Mobility - LTE Backup Circuits	4,580.64	4,650.00	59,942.91	55,800.00	(4,142.91)
AT&T - TCC Services	13,002.50	16,666.63	156,030.00	200,000.00	43,970.00
AT&T - ESI Net Services	240,669.07	326,666.63	3,524,934.23	3,920,000.00	395,065.77
AT&T - Rapid Deploy	71,804.00	125,000.00	861,648.00	1,500,000.00	638,352.00
AT&T Legacy Connection Charges	14,038.10	14,583.37	168,230.43	175,000.00	6,769.57
AT&T - NBFW	4,853.55	5,000.00	63,076.15	60,000.00	(3,076.15)
AT&T - Security	0.00	833.37	0.00	10,000.00	10,000.00
AT&T Service Contracts	676,996.10	821,420.87	8,774,229.57	9,857,050.00	1,082,820.43
LCPA Contract	12,280.17	12,280.13	147,344.25	147,362.00	17.75
Non-Admin. Contract Staff					
Contract Labor	27,997.66	26,687.50	321,070.52	320,250.00	(820.52)
Office Supplies	239.30	0.00	1,069.58	0.00	(1,069.58)
Telephone	241.92	0.00	1,694.32	0.00	(1,694.32)
Conference Expense - Staff	0.00	1,666.63	5,129.93	20,000.00	14,870.07
Conference & Training	0.00	0.00	3,172.49	0.00	(3,172.49)
Conference Registrations	0.00	1,666.63	1,579.44	20,000.00	18,420.56
Travel & Meals - Conferences	0.00	0.00	378.00	0.00	(378.00)
Travel Expense	596.10	2,916.63	7,996.53	35,000.00	27,003.47
Vehicle Expense	0.00	0.00	175.44	0.00	(175.44)
Vehicle Fuel	19.14	775.00	2,493.67	9,300.00	6,806.33
Vehicle Insurance & Registration	0.00	1,000.00	9,188.69	12,000.00	2,811.31
Vehicle Repairs & Maintenance	0.00	187.50	237.95	2,250.00	2,012.05

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Non-Admin. Contract Staff Expenses	29,094.12	33,233.26	349,056.63	398,800.00	49,743.37
<i>Legal Representation</i>	587.10	3,750.00	7,261.50	45,000.00	37,738.50
<i>ITSS Contract</i>	32,640.00	17,000.00	209,948.73	204,000.00	(5,948.73)
<i>PM Contract</i>	7,740.00	12,480.00	110,963.80	149,760.00	38,796.20
<i>Imagery Contract</i>	0.00	0.00	129,150.00	0.00	(129,150.00)
<i>DASC Contract</i>	125,000.00	20,833.37	375,432.71	250,000.00	(125,432.71)
<i>Dickinson County Contract</i>	130,228.61	4,895.12	190,438.83	58,741.00	(131,697.83)
<i>Public Relations</i>	0.00	1,000.00	772.73	12,000.00	11,227.27
<i>Training - Admin Fall Conference</i>	0.00	2,083.37	15,766.70	25,000.00	9,233.30
<i>Onsite Training - EMTDC</i>	0.00	533.37	0.00	6,400.00	6,400.00
<i>EMTDC Deployment Costs</i>	0.00	666.63	0.00	8,000.00	8,000.00
<i>Technical Supplies and Equipment</i>	244.89	3,333.37	2,218.92	40,000.00	37,781.08
<i>Learning Management System</i>	14,700.00	1,433.37	32,950.00	17,200.00	(15,750.00)
<i>Esri ELAContract (KS OITIS)</i>	0.00	2,723.37	32,648.00	32,680.00	32.00
Other Contract Costs	311,140.60	70,731.97	1,107,551.92	848,781.00	(258,770.92)
<i>Hardware</i>	0.00	0.00	9,980.40	0.00	(9,980.40)
<i>Software</i>	0.00	0.00	40,986.57	0.00	(40,986.57)
Grant Expenses	0.00	0.00	50,966.97	0.00	(50,966.97)
Total Contractual Costs	\$1,029,510.99	\$937,666.23	\$10,429,149.34	\$11,251,993.00	\$822,843.66
Total Expenses	1,049,873.36	960,676.98	10,676,661.69	11,528,122.00	851,460.31
Other Income					
Investment Interest/Dividends	12,402.88	0.00	198,161.11	0.00	(198,161.11)
Gain/Loss on Investment	(19,106.11)	0.00	(557,502.63)	0.00	557,502.63
Total Other Income	(\$6,703.23)	\$0.00	(\$359,341.52)	\$0.00	\$359,341.52
Other Expense					
Investment Fees	3,511.54	0.00	44,373.81	0.00	(44,373.81)
Total Other Expense	\$3,511.54	\$0.00	\$44,373.81	\$0.00	(\$44,373.81)
Net Other Income and Expense	(\$10,214.77)	\$0.00	(\$403,715.33)	\$0.00	\$403,715.33
Net Change in Net Assets	\$963,877.59	(\$379,800.85)	\$4,772,813.87	(\$4,557,608.00)	(\$9,330,421.87)

**Kansas 911 Coordinating Council
911 State Grant Fund
For the Twelve Months Ending Saturday, December 31, 2022**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 22 Budget Remaining
Revenue					
Telcom Income	\$60,265.21	\$0.00	\$364,663.76	\$0.00	(\$364,663.76)
Interest Income	3,346.64	0.00	14,759.47	0.00	(14,759.47)
Total Revenue	\$63,611.85	\$0.00	\$379,423.23	\$0.00	(\$379,423.23)
Net Change in Net Assets	\$63,611.85	\$0.00	\$379,423.23	\$0.00	(\$379,423.23)

Appendix C: 2021 Income Statement for State Fund (PSAP distributions) and Consolidated Funds

**Kansas 911 Coordinating Council
Summary
For the Twelve Months Ending Friday, December 31, 2021**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Revenue					
Telcom Income	\$2,867,825.44	\$2,634,333.37	\$32,578,388.84	\$31,612,000.00	(\$966,388.84)
Prepay Fee Income	632,635.52	250,000.00	2,609,710.61	3,000,000.00	390,289.39
PSAP 911 Services Payments	416,446.31	328,470.25	4,398,302.37	3,941,643.00	(456,659.37)
Imagery Cost Share	0.00	9,583.37	100,000.00	115,000.00	15,000.00
Grant Income	396,058.41	0.00	1,562,151.34	0.00	(1,562,151.34)
Interest Income	706.14	5,833.37	6,980.26	70,000.00	63,019.74
Total Revenue	\$4,313,671.82	\$3,228,220.36	\$41,255,533.42	\$38,738,643.00	(\$2,516,890.42)
PSAP Expenses					
PSAP Payments	1,759,448.50	1,838,484.37	20,508,584.09	22,061,812.00	1,553,227.91
PSAP Minimum Quarterly Payments	282,845.97	131,134.87	1,580,036.46	1,573,618.00	(6,418.46)
Total PSAP Expenses	\$2,042,294.47	\$1,969,619.24	\$22,088,620.55	\$23,635,430.00	\$1,546,809.45
Operating Expenses					
<i>Contract Labor</i>	<i>12,129.16</i>	<i>12,125.00</i>	<i>145,549.92</i>	<i>145,500.00</i>	<i>(49.92)</i>
<i>Office Supplies</i>	<i>0.00</i>	<i>0.00</i>	<i>3.36</i>	<i>0.00</i>	<i>(3.36)</i>
<i>Telephone</i>	<i>0.00</i>	<i>295.00</i>	<i>0.00</i>	<i>3,540.00</i>	<i>3,540.00</i>
<i>Conference Expense - Admin</i>	<i>0.00</i>	<i>0.00</i>	<i>465.00</i>	<i>0.00</i>	<i>(465.00)</i>
<i>Conference & Training</i>	<i>0.00</i>	<i>0.00</i>	<i>465.00</i>	<i>0.00</i>	<i>(465.00)</i>
<i>Travel Expense</i>	<i>0.00</i>	<i>416.63</i>	<i>2,723.60</i>	<i>5,000.00</i>	<i>2,276.40</i>
<i>Vehicle Fuel</i>	<i>114.16</i>	<i>225.00</i>	<i>957.33</i>	<i>2,700.00</i>	<i>1,742.67</i>
<i>Vehicle Insurance & Registration</i>	<i>0.00</i>	<i>333.37</i>	<i>0.00</i>	<i>4,000.00</i>	<i>4,000.00</i>
<i>Vehicle Repairs & Maintenance</i>	<i>0.00</i>	<i>0.00</i>	<i>11.00</i>	<i>0.00</i>	<i>(11.00)</i>
Personnel Contracts	12,243.32	13,395.00	149,710.21	160,740.00	11,029.79
<i>Legislative Pay</i>	<i>88.66</i>	<i>625.00</i>	<i>354.64</i>	<i>7,500.00</i>	<i>7,145.36</i>
<i>Interpreters for Meetings</i>	<i>0.00</i>	<i>75.00</i>	<i>0.00</i>	<i>900.00</i>	<i>900.00</i>
<i>Meeting Expenses - Council</i>	<i>0.00</i>	<i>41.63</i>	<i>0.00</i>	<i>500.00</i>	<i>500.00</i>
<i>Conference Call Service</i>	<i>32.55</i>	<i>141.63</i>	<i>1,763.42</i>	<i>1,700.00</i>	<i>(63.42)</i>
<i>Travel & Meals</i>	<i>0.00</i>	<i>416.63</i>	<i>125.89</i>	<i>5,000.00</i>	<i>4,874.11</i>
Council Meeting Expenses	121.21	1,299.89	2,243.95	15,600.00	13,356.05
<i>GIS Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Operations Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Technical/Security Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Training Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Committee Meeting Expenses	0.00	333.48	0.00	4,000.00	4,000.00
<i>Audit Fees</i>	0.00	833.37	5,754.96	10,000.00	4,245.04
<i>State Registration Fees</i>	0.00	0.00	371.00	0.00	(371.00)
<i>Bank Fees</i>	268.15	349.89	2,980.58	4,200.00	1,219.42
<i>PM Contract - Council Admin</i>	2,507.00	3,979.00	37,811.17	47,748.00	9,936.83
<i>Public Relations</i>	0.00	250.00	0.00	3,000.00	3,000.00
<i>Membership Dues</i>	700.00	250.00	1,200.00	3,000.00	1,800.00
<i>Travel & Meals</i>	0.00	250.00	478.40	3,000.00	2,521.60
<i>State Conferences and Training</i>	0.00	0.00	2,463.59	0.00	(2,463.59)
<i>Registrations</i>	0.00	62.50	0.00	750.00	750.00
<i>Travel & Meals</i>	0.00	125.00	0.00	1,500.00	1,500.00
<i>Other Conference Expenses</i>	0.00	20.87	0.00	250.00	250.00
<i>Registrations</i>	0.00	320.87	674.00	3,850.00	3,176.00
<i>Travel & Meals</i>	0.00	1,250.00	1,903.35	15,000.00	13,096.65
<i>Other National Conference Expenses</i>	0.00	16.63	0.00	200.00	200.00
<i>Website Maintenance</i>	0.00	0.00	61.00	0.00	(61.00)
Other Administrative Costs	3,475.15	7,708.13	53,698.05	92,498.00	38,799.95
Total Operating Expenses	\$15,839.68	\$22,736.50	\$205,652.21	\$272,838.00	\$67,185.79

Contractual Costs

<i>AT&T - AVPN Access</i>	93,879.52	91,666.63	1,079,574.21	1,100,000.00	20,425.79
<i>AT&T - POTS Router Circuits</i>	4,005.83	3,666.63	49,844.32	44,000.00	(5,844.32)
<i>AT&T - Call Handling</i>	170,997.63	100,000.00	2,452,558.35	1,200,000.00	(1,252,558.35)
<i>AT&T - AVPN Ports</i>	43,557.82	24,166.63	404,280.40	290,000.00	(114,280.40)
<i>AT&T - T1 Backup Circuits</i>	249.39	500.00	2,982.96	6,000.00	3,017.04
<i>AT&T - MIS</i>	0.00	1,833.37	474.97	22,000.00	21,525.03
<i>AT&T - Service Manager</i>	29,166.00	14,583.37	160,413.00	175,000.00	14,587.00
<i>AT&T Mobility - EOD-CSS</i>	0.00	5,716.63	0.00	68,600.00	68,600.00
<i>AT&T Mobility - LTE Backup Circuits</i>	4,621.88	2,705.00	53,973.94	32,460.00	(21,513.94)
<i>AT&T - TCC Services</i>	13,002.50	16,666.63	156,030.00	200,000.00	43,970.00
<i>AT&T - ESI Net Services</i>	296,021.67	291,666.63	3,437,693.19	3,500,000.00	62,306.81
<i>AT&T - Rapid Deploy</i>	71,804.00	125,000.00	893,728.12	1,500,000.00	606,271.88
<i>AT&T Legacy Connection Charges</i>	13,962.51	14,583.37	167,005.95	175,000.00	7,994.05
<i>AT&T - NBFW</i>	4,853.55	5,000.00	53,389.05	60,000.00	6,610.95
AT&T Service Contracts	746,122.30	697,754.89	8,911,948.46	8,373,060.00	(538,888.46)
LCPA Contract	12,039.50	12,039.50	144,474.00	144,474.00	0.00
Non-Admin. Contract Staff					
<i>Contract Labor</i>	26,482.50	29,833.37	312,465.00	358,000.00	45,535.00

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
<i>Office Supplies</i>	220.40	0.00	594.95	0.00	(594.95)
<i>Telephone</i>	241.88	0.00	1,694.36	0.00	(1,694.36)
<i>Conference Expense - Staff</i>	0.00	2,083.26	3,062.49	25,000.00	21,937.51
<i>Conference & Training</i>	0.00	1,666.63	3,062.49	20,000.00	16,937.51
<i>Conference Registrations</i>	0.00	416.63	0.00	5,000.00	5,000.00
<i>Travel Expense</i>	0.00	2,916.63	3,594.72	35,000.00	31,405.28
<i>Vehicle Fuel</i>	0.00	775.00	1,109.20	9,300.00	8,190.80
<i>Vehicle Insurance & Registration</i>	0.00	2,000.00	0.00	24,000.00	24,000.00
<i>Vehicle Repairs & Maintenance</i>	0.00	208.37	61.44	2,500.00	2,438.56
Non-Admin. Contract Staff Expenses	26,944.78	37,816.63	322,582.16	453,800.00	131,217.84
<i>Legal Representation</i>	1,545.00	3,750.00	10,629.60	45,000.00	34,370.40
<i>ITSS Contract</i>	13,871.68	19,933.37	199,241.36	239,200.00	39,958.64
<i>PM Contract</i>	10,028.00	15,916.00	159,106.30	190,992.00	31,885.70
<i>Imagery Contract</i>	387,450.00	108,333.37	1,162,350.00	1,300,000.00	137,650.00
<i>DASC Contract</i>	20,833.35	20,833.37	125,000.00	250,000.00	125,000.00
<i>Dickinson County Contract</i>	0.00	4,100.00	29,370.43	49,200.00	19,829.57
<i>Public Relations</i>	0.00	1,000.00	0.00	12,000.00	12,000.00
<i>Training - Admin Fall Conference</i>	0.00	1,375.00	4,100.00	16,500.00	12,400.00
<i>Onsite Training - EMTDC</i>	0.00	533.37	0.00	6,400.00	6,400.00
<i>EMTDC Deployment Costs</i>	0.00	666.63	0.00	8,000.00	8,000.00
<i>Technical Supplies and Equipment</i>	197.49	3,333.37	2,200.95	40,000.00	37,799.05
<i>Learning Management System</i>	225.00	1,433.37	450.00	17,200.00	16,750.00
<i>Esri ELAContract (KS OITIS)</i>	0.00	2,723.37	32,648.00	32,680.00	32.00
Other Contract Costs	434,150.52	183,931.22	1,725,096.64	2,207,172.00	482,075.36
<i>Hardware</i>	288,905.87	0.00	657,966.25	0.00	(657,966.25)
<i>Software</i>	0.00	0.00	14,841.37	0.00	(14,841.37)
Grant Expenses	288,905.87	0.00	672,807.62	0.00	(672,807.62)
Total Contractual Costs	\$1,508,162.97	\$931,542.24	\$11,776,908.88	\$11,178,506.00	(\$598,402.88)
Total Expenses	3,566,297.12	2,923,897.98	34,071,181.64	35,086,774.00	1,015,592.36
Other Income					
Investment Interest/Dividends	17,354.71	0.00	236,225.56	0.00	(236,225.56)
Gain/Loss on Investment	(18,032.15)	0.00	(312,816.99)	0.00	312,816.99
Total Other Income	(\$677.44)	\$0.00	(\$76,591.43)	\$0.00	\$76,591.43
Other Expense					
Investment Fees	7,119.06	0.00	59,302.45	0.00	(59,302.45)
Total Other Expense	\$7,119.06	\$0.00	\$59,302.45	\$0.00	(\$59,302.45)

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Net Other Income and Expense	(\$7,796.50)	\$0.00	(\$135,893.88)	\$0.00	\$135,893.88
Net Change in Net Assets	\$739,578.20	\$304,322.38	\$7,048,457.90	\$3,651,869.00	(\$3,396,588.90)
Operating Expense Percentage			0.52%		

**Kansas 911 Coordinating Council
911 State Fund
For the Twelve Months Ending Friday, December 31, 2021**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Revenue					
Telcom Income	\$2,133,776.20	\$2,634,333.37	\$24,171,590.87	\$31,612,000.00	\$7,440,409.13
Interest Income	191.61	1,944.49	1,779.62	23,333.33	21,553.71
Total Revenue	\$2,133,967.81	\$2,636,277.86	\$24,173,370.49	\$31,635,333.33	\$7,461,962.84
PSAP Expenses					
PSAP Payments	1,759,448.50	1,838,484.37	20,508,584.09	22,061,812.00	1,553,227.91
PSAP Minimum Quarterly Payments	282,845.97	131,134.87	1,580,036.46	1,573,618.00	(6,418.46)
Total PSAP Expenses	\$2,042,294.47	\$1,969,619.24	\$22,088,620.55	\$23,635,430.00	\$1,546,809.45
Operating Expenses					
<i>Bank Fees</i>	<i>268.15</i>	<i>116.63</i>	<i>2,863.58</i>	<i>1,400.00</i>	<i>(1,463.58)</i>
Other Administrative Costs	268.15	116.63	2,863.58	1,400.00	(1,463.58)
Total Operating Expenses	\$268.15	\$116.63	\$2,863.58	\$1,400.00	(\$1,463.58)
Total Expenses	2,042,562.62	1,969,735.87	22,091,484.13	23,636,830.00	1,545,345.87
Other Income					
Investment Interest/Dividends	3,435.48	0.00	52,856.50	0.00	(52,856.50)
Gain/Loss on Investment	(3,547.45)	0.00	(68,728.89)	0.00	68,728.89
Total Other Income	(\$111.97)	\$0.00	(\$15,872.39)	\$0.00	\$15,872.39
Other Expense					
Investment Fees	1,794.01	0.00	14,608.79	0.00	(14,608.79)
Total Other Expense	\$1,794.01	\$0.00	\$14,608.79	\$0.00	(\$14,608.79)
Net Other Income and Expense	(\$1,905.98)	\$0.00	(\$30,481.18)	\$0.00	\$30,481.18
Net Change in Net Assets	\$89,499.21	\$666,541.99	\$2,051,405.18	\$7,998,503.33	\$5,947,098.15

**Kansas 911 Coordinating Council
911 Operations Fund
For the Twelve Months Ending Friday, December 31, 2021**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Revenue					
Telcom Income	\$703,545.97	\$0.00	\$8,057,416.61	\$0.00	(\$8,057,416.61)
Prepay Fee Income	632,635.52	250,000.00	2,609,710.61	3,000,000.00	390,289.39
PSAP 911 Services Payments	416,446.31	328,470.25	4,398,302.37	3,941,643.00	(456,659.37)
Imagery Cost Share	0.00	9,583.37	100,000.00	115,000.00	15,000.00
Grant Income	396,058.41	0.00	1,562,151.34	0.00	(1,562,151.34)
Interest Income	486.25	1,944.39	4,952.30	23,333.34	18,381.04
Total Revenue	\$2,149,172.46	\$589,998.01	\$16,732,533.23	\$7,079,976.34	(\$9,652,556.89)
Operating Expenses					
<i>Contract Labor</i>	<i>12,129.16</i>	<i>12,125.00</i>	<i>145,549.92</i>	<i>145,500.00</i>	<i>(49.92)</i>
<i>Office Supplies</i>	<i>0.00</i>	<i>0.00</i>	<i>3.36</i>	<i>0.00</i>	<i>(3.36)</i>
<i>Telephone</i>	<i>0.00</i>	<i>295.00</i>	<i>0.00</i>	<i>3,540.00</i>	<i>3,540.00</i>
<i>Conference Expense - Admin</i>	<i>0.00</i>	<i>0.00</i>	<i>465.00</i>	<i>0.00</i>	<i>(465.00)</i>
<i>Conference & Training</i>	<i>0.00</i>	<i>0.00</i>	<i>465.00</i>	<i>0.00</i>	<i>(465.00)</i>
<i>Travel Expense</i>	<i>0.00</i>	<i>416.63</i>	<i>2,723.60</i>	<i>5,000.00</i>	<i>2,276.40</i>
<i>Vehicle Fuel</i>	<i>114.16</i>	<i>225.00</i>	<i>957.33</i>	<i>2,700.00</i>	<i>1,742.67</i>
<i>Vehicle Insurance & Registration</i>	<i>0.00</i>	<i>333.37</i>	<i>0.00</i>	<i>4,000.00</i>	<i>4,000.00</i>
<i>Vehicle Repairs & Maintenance</i>	<i>0.00</i>	<i>0.00</i>	<i>11.00</i>	<i>0.00</i>	<i>(11.00)</i>
Personnel Contracts	12,243.32	13,395.00	149,710.21	160,740.00	11,029.79
<i>Legislative Pay</i>	<i>88.66</i>	<i>625.00</i>	<i>354.64</i>	<i>7,500.00</i>	<i>7,145.36</i>
<i>Interpreters for Meetings</i>	<i>0.00</i>	<i>75.00</i>	<i>0.00</i>	<i>900.00</i>	<i>900.00</i>
<i>Meeting Expenses - Council</i>	<i>0.00</i>	<i>41.63</i>	<i>0.00</i>	<i>500.00</i>	<i>500.00</i>
<i>Conference Call Service</i>	<i>32.55</i>	<i>141.63</i>	<i>1,763.42</i>	<i>1,700.00</i>	<i>(63.42)</i>
<i>Travel & Meals</i>	<i>0.00</i>	<i>416.63</i>	<i>125.89</i>	<i>5,000.00</i>	<i>4,874.11</i>
Council Meeting Expenses	121.21	1,299.89	2,243.95	15,600.00	13,356.05
<i>GIS Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Operations Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Technical/Security Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
<i>Training Committee</i>	<i>0.00</i>	<i>83.37</i>	<i>0.00</i>	<i>1,000.00</i>	<i>1,000.00</i>
Committee Meeting Expenses	0.00	333.48	0.00	4,000.00	4,000.00
<i>Audit Fees</i>	<i>0.00</i>	<i>833.37</i>	<i>5,754.96</i>	<i>10,000.00</i>	<i>4,245.04</i>
<i>State Registration Fees</i>	<i>0.00</i>	<i>0.00</i>	<i>371.00</i>	<i>0.00</i>	<i>(371.00)</i>
<i>Bank Fees</i>	<i>0.00</i>	<i>116.63</i>	<i>117.00</i>	<i>1,400.00</i>	<i>1,283.00</i>
<i>PM Contract - Council Admin</i>	<i>2,507.00</i>	<i>3,979.00</i>	<i>37,811.17</i>	<i>47,748.00</i>	<i>9,936.83</i>
<i>Public Relations</i>	<i>0.00</i>	<i>250.00</i>	<i>0.00</i>	<i>3,000.00</i>	<i>3,000.00</i>

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Membership Dues	700.00	250.00	1,200.00	3,000.00	1,800.00
Travel & Meals	0.00	250.00	478.40	3,000.00	2,521.60
State Conferences and Training	0.00	0.00	2,463.59	0.00	(2,463.59)
Registrations	0.00	62.50	0.00	750.00	750.00
Travel & Meals	0.00	125.00	0.00	1,500.00	1,500.00
Other Conference Expenses	0.00	20.87	0.00	250.00	250.00
Registrations	0.00	320.87	674.00	3,850.00	3,176.00
Travel & Meals	0.00	1,250.00	1,903.35	15,000.00	13,096.65
Other National Conference Expenses	0.00	16.63	0.00	200.00	200.00
Website Maintenance	0.00	0.00	61.00	0.00	(61.00)
Other Administrative Costs	3,207.00	7,474.87	50,834.47	89,698.00	38,863.53
Total Operating Expenses	\$15,571.53	\$22,503.24	\$202,788.63	\$270,038.00	\$67,249.37

Contractual Costs

AT&T - AVPN Access	93,879.52	91,666.63	1,079,574.21	1,100,000.00	20,425.79
AT&T - POTS Router Circuits	4,005.83	3,666.63	49,844.32	44,000.00	(5,844.32)
AT&T - Call Handling	170,997.63	100,000.00	2,452,558.35	1,200,000.00	(1,252,558.35)
AT&T - AVPN Ports	43,557.82	24,166.63	404,280.40	290,000.00	(114,280.40)
AT&T - T1 Backup Circuits	249.39	500.00	2,982.96	6,000.00	3,017.04
AT&T - MIS	0.00	1,833.37	474.97	22,000.00	21,525.03
AT&T - Service Manager	29,166.00	14,583.37	160,413.00	175,000.00	14,587.00
AT&T Mobility - EOD-CSS	0.00	5,716.63	0.00	68,600.00	68,600.00
AT&T Mobility - LTE Backup Circuits	4,621.88	2,705.00	53,973.94	32,460.00	(21,513.94)
AT&T - TCC Services	13,002.50	16,666.63	156,030.00	200,000.00	43,970.00
AT&T - ESI Net Services	296,021.67	291,666.63	3,437,693.19	3,500,000.00	62,306.81
AT&T - Rapid Deploy	71,804.00	125,000.00	893,728.12	1,500,000.00	606,271.88
AT&T Legacy Connection Charges	13,962.51	14,583.37	167,005.95	175,000.00	7,994.05
AT&T - NBFW	4,853.55	5,000.00	53,389.05	60,000.00	6,610.95
AT&T Service Contracts	746,122.30	697,754.89	8,911,948.46	8,373,060.00	(538,888.46)
LCPA Contract	12,039.50	12,039.50	144,474.00	144,474.00	0.00
Non-Admin. Contract Staff					
Contract Labor	26,482.50	29,833.37	312,465.00	358,000.00	45,535.00
Office Supplies	220.40	0.00	594.95	0.00	(594.95)
Telephone	241.88	0.00	1,694.36	0.00	(1,694.36)
Conference Expense - Staff	0.00	2,083.26	3,062.49	25,000.00	21,937.51
Conference & Training	0.00	1,666.63	3,062.49	20,000.00	16,937.51
Conference Registrations	0.00	416.63	0.00	5,000.00	5,000.00
Travel Expense	0.00	2,916.63	3,594.72	35,000.00	31,405.28

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
<i>Vehicle Fuel</i>	0.00	775.00	1,109.20	9,300.00	8,190.80
<i>Vehicle Insurance & Registration</i>	0.00	2,000.00	0.00	24,000.00	24,000.00
<i>Vehicle Repairs & Maintenance</i>	0.00	208.37	61.44	2,500.00	2,438.56
Non-Admin. Contract Staff Expenses	26,944.78	37,816.63	322,582.16	453,800.00	131,217.84
<i>Legal Representation</i>	1,545.00	3,750.00	10,629.60	45,000.00	34,370.40
<i>ITSS Contract</i>	13,871.68	19,933.37	199,241.36	239,200.00	39,958.64
<i>PM Contract</i>	10,028.00	15,916.00	159,106.30	190,992.00	31,885.70
<i>Imagery Contract</i>	387,450.00	108,333.37	1,162,350.00	1,300,000.00	137,650.00
<i>DASC Contract</i>	20,833.35	20,833.37	125,000.00	250,000.00	125,000.00
<i>Dickinson County Contract</i>	0.00	4,100.00	29,370.43	49,200.00	19,829.57
<i>Public Relations</i>	0.00	1,000.00	0.00	12,000.00	12,000.00
<i>Training - Admin Fall Conference</i>	0.00	1,375.00	4,100.00	16,500.00	12,400.00
<i>Onsite Training - EMTDC</i>	0.00	533.37	0.00	6,400.00	6,400.00
<i>EMTDC Deployment Costs</i>	0.00	666.63	0.00	8,000.00	8,000.00
<i>Technical Supplies and Equipment</i>	197.49	3,333.37	2,200.95	40,000.00	37,799.05
<i>Learning Management System</i>	225.00	1,433.37	450.00	17,200.00	16,750.00
<i>Esri ELAContract (KS OITIS)</i>	0.00	2,723.37	32,648.00	32,680.00	32.00
Other Contract Costs	434,150.52	183,931.22	1,725,096.64	2,207,172.00	482,075.36
<i>Hardware</i>	288,905.87	0.00	657,966.25	0.00	(657,966.25)
<i>Software</i>	0.00	0.00	14,841.37	0.00	(14,841.37)
Grant Expenses	288,905.87	0.00	672,807.62	0.00	(672,807.62)
Total Contractual Costs	\$1,508,162.97	\$931,542.24	\$11,776,908.88	\$11,178,506.00	(\$598,402.88)
Total Expenses	1,523,734.50	954,045.48	11,979,697.51	11,448,544.00	(531,153.51)
Other Income					
Investment Interest/Dividends	13,919.23	0.00	183,369.06	0.00	(183,369.06)
Gain/Loss on Investment	(14,484.70)	0.00	(244,088.10)	0.00	244,088.10
Total Other Income	(\$565.47)	\$0.00	(\$60,719.04)	\$0.00	\$60,719.04
Other Expense					
Investment Fees	5,325.05	0.00	44,693.66	0.00	(44,693.66)
Total Other Expense	\$5,325.05	\$0.00	\$44,693.66	\$0.00	(\$44,693.66)
Net Other Income and Expense	(\$5,890.52)	\$0.00	(\$105,412.70)	\$0.00	\$105,412.70

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Net Change in Net Assets	\$619,547.44	(\$364,047.47)	\$4,647,423.02	(\$4,368,567.66)	(\$9,015,990.68)

**Kansas 911 Coordinating Council
911 State Grant Fund
For the Twelve Months Ending Friday, December 31, 2021**

	Current Period	Current Period Budget	Current YTD	Budget YTD	FY 21 Budget Remaining
Revenue					
Telcom Income	\$30,503.27	\$0.00	\$349,381.36	\$0.00	(\$349,381.36)
Interest Income	28.28	1,944.49	248.34	23,333.33	23,084.99
Total Revenue	\$30,531.55	\$1,944.49	\$349,629.70	\$23,333.33	(\$326,296.37)
Operating Expenses					
<i>Bank Fees</i>	<i>0.00</i>	<i>116.63</i>	<i>0.00</i>	<i>1,400.00</i>	<i>1,400.00</i>
Other Administrative Costs	0.00	116.63	0.00	1,400.00	1,400.00
Total Operating Expenses	\$0.00	\$116.63	\$0.00	\$1,400.00	\$1,400.00
Total Expenses	0.00	116.63	0.00	1,400.00	1,400.00
Net Change in Net Assets	\$30,531.55	\$1,827.86	\$349,629.70	\$21,933.33	(\$327,696.37)

Appendix D: PSAP Survey

Kansas NG911 PSAP Survey

Information from this PSAP Survey will be used only to assist in the System Audit of the Kansas NG911 System as required by K.S.A. 12-5377(c). These questions have been developed to assess the State's NG911 system capabilities and standard operating procedures. All responses to this survey will only be used for the statutorily required NG911 system audit being performed for the Kansas Legislature's Division of Post Audit.

* Indicates required question

1. Please identify your PSAP. *

2. Which NG911 Platform has been selected for use by your PSAP/jurisdiction? *

Mark only one oval.

Kansas NG911 *Skip to question 4*

Mid-America Regional Council Regional 911 System *Skip to question 16*

3. What is the approximate annual budget for your PSAP?

Kansas NG911 PSAPs

4. Has your PSAP experienced any downtime on the Kansas NG911 Platform in the past two years? *

Mark only one oval.

Yes *Skip to question 5*

No *Skip to question 8*

Kansas NG911 Platform Downtime

5. Please describe the frequency and duration of system downtime experienced by your PSAP. *

6. Please describe the cause(s) of system downtime experienced by your PSAP, and whether the issue(s) has been resolved. *

7. Did the Kansas NG911 system backup/rerouting operate efficiently and as designed during the system downtime/outage? *

Mark only one oval.

Yes

No

8. What i3 capabilities, features and services would you like to see supported by the Kansas NG911 platform? *

Check all that apply.

- 3D Mapping, "Z-Axis"
- PSAP to PSAP chats
- Automated Abandoned Callback
- 3rd Party Data Access, e.g., KDHE Hazmat Tier 3 reports
- RapidRadar Geospatial Search radius
- "Panic Button" calls, e.g., Rave
- CAD Interoperability, CAD to CAD data sharing
- Artificial Intelligence User Interface
- Real time transcription of calls
- RapidDeploy Drone Deployment
- TrainFo Sensors at Railroad Crossings
- 3D mapping, Indoor and building footprint
- Continue Ortho-imagery Refresh every 3 years
- Other: _____

9. What capabilities, services and features enabled by i3 do you believe would be most useful or valuable for your PSAP? *

10. Please identify the NG911 training resources used for your PSAP's telecommunicators. *

Mark only one oval.

- Coordinating Council training resources
- Kansas APCO training resources
- NENA or other national training resources
- Vendor training resources
- Other: _____

11. Please identify the NG911 training resources you anticipate using for your PSAP's telecommunicators in the next two to three years. *

12. Please describe the training resources you would like to see provided for your PSAP's telecommunicators by the Kansas NG911 Coordinating Council. *

13. If there was one thing that could be improved in the State's current NG911 platform, what would it be? *

14. How often do you use the Coordinating Council's NG911 web portal? *

Mark only one oval.

- Seldom
- On occasion
- Regularly
- Frequently

15. If there was one thing that could be improved in the Coordinating Council's NG911 Web Portal, what would it be? *

Skip to question 20

MARC NG911 PSAPs

16. What i3 capabilities, features and services would you like to see available via NG911 platform? *

Check all that apply.

- 3D Mapping, "Z-Axis" information displayed
- PSAP to PSAP chats
- Automated Abandoned Callback
- 3rd Party Data access, e.g., KDHE Hazmat Tier 3 Reports
- Geospatial Search in radius around call address
- "Panic Button" calls, e.g., Rave
- CAD interoperability, e.g., Rave CAD to CAD data sharing
- TrainFo sensors at railroad crossings for responders via app
- Artificial Intelligence User Interface
- Real Time transcription of calls
- Drone Deployment, e.g., RapidDeploy
- Other: _____

17. What NG911 capabilities, services and features enabled by i3 do you believe would be most useful or valuable for your PSAP?

18. Please identify the NG911 training resources used for your PSAP's telecommunicators. *

Mark only one oval.

- Kansas APCO training resources
- NENA or other national training resources
- Vendor training resources
- Other: _____

19. Please identify the NG911 training resources you anticipate using for your PSAP's telecommunicators in the next two to three years. *

Text to 911/RTT, Standard Operating Procedures, and Staffing

20. How would you characterize the level of “Text to 911” volume being experienced by your PSAP? *

Mark only one oval.

- very little
- small but growing
- significant
- unsure

21. What issues if any has your PSAP experienced in handling “Text to 911” calls? *

22. Does your PSAP currently use a provider for language services? *

Mark only one oval.

Yes

No

Unsure

23. If “yes”, please provide vendor name, solution, and feedback regarding the provided service. If “no”, would your PSAP be interested in an optional statewide solution? *

24. Has your PSAP adopted and implemented Standard Operating Procedures (SOPs) or Standard Operating Guidelines (SOGs) for processing silent, open-line calls, and non-responsive emergency communications requests for assistance? Does the telecommunicator interrogate the line for a possible TDD/TTY/SMS/Real-time Text (RTT) Text call? *

Mark only one oval.

Yes

No

I don't know

25. Has your PSAP developed and incorporated methods for transferring TDD/TTY/SMS/RTT Text calls to fire, police or EMS? *

Mark only one oval.

- Yes
 No
 I don't know

26. Is refresher training provided to telecommunicators for TDD/TTY/SMS/RTT Text, and, if so, at a minimum of every 6 months? *

Mark only one oval.

- Yes
 No
 I don't know

27. Has a public awareness program been developed and implemented, to notify people using TDD/TTY/SMS/RTT Text about the ways your PSAP can provide them with direct access? *

Mark only one oval.

- Yes
 No
 I don't know

28. Have you communicated with your vendor about the introduction of RTT capabilities to your PSAP? *

Mark only one oval.

- Yes
- No
- No, but I plan to

29. Please characterize the current staffing level for your PSAP's telecommunicators. *

Mark only one oval.

- Fully staffed
- 75% staffed
- 50% staffed, or less

30. In order to potentially support achievement and maintenance of adequate PSAP staffing, and assuming security and network considerations could be worked out, would your PSAP be interested in participating in a trial or pilot program using trained work-at-home PSAP telecommunicators? *

Mark only one oval.

- Yes
- No
- Maybe

31. Please offer any comments on potential trial program for using trained work-at-home PSAP telecommunicators. *

32. Please provide any additional comments you feel should be considered in the Kansas NG-911 system audit. *

Thank you for completing the Kansas NG911 Survey

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Google Forms



November 29, 2023

Legislative Post Audit Committee
Kansas Statehouse
300 SW 10th St
Topeka, KS 66612

Mr. Chairman and Members of the Committee,

On behalf of the Kansas 911 Coordinating Council ("Council"), I am writing in regard to the five-year audit Report of the Kansas 911 Act. This audit is required by the Act. Having reviewed the Report, we feel that the audit is accurate and for the most part are in agreement with the findings and conclusions. Our thoughts on the findings and conclusions and issues for consideration are set forth in the following table.

Sincerely,

A handwritten signature in blue ink that reads "Troy Briggs".

Troy Briggs, Chairman
Troy.Briggs@Kansas911.org

A handwritten signature in blue ink that reads "Scott Ekberg".

Scott Ekberg, NG911 Administrator
Scott.Ekberg@Kansas911.org



Section	Page #	Comment
Findings and Conclusions	106	<p>In 2019, when the Act was last amended, the Council presented an argument that a \$0.23 fee was necessary to fund Council operations and the statewide call handling system. That estimate has proven to be accurate and based on business case projections will allow operations to be funded through 2030.</p> <p>The Council agrees that PSAP funding is inadequate. In 2019, PSAPs received a \$0.13 increase in 911 fee funding. Rising costs from unforeseen inflation has left the PSAPs with insufficient funding for necessary and allowable 911 expenses. Funding to cover this deficiency must be covered with an increase in local property tax funding. In 2020 the percentage of total 911 funding coming from local general funds was approximately 60%. That percentage has increased to 84% based on 2022 data.</p> <p>The Council agrees that the minimum funding amount of \$60,000 is inadequate for PSAP operations. Data indicates that the \$60,000 minimum granted in 2019 equates to \$72,000 in 2023 dollars and believes that the minimum can be increased to \$80,000 without adverse impact or any additional change to legislation. This would allow minimally funded PSAPs to pay some of the allowable expenses that are currently required to be funded with local general fund dollars and save towards future replacement costs of ancillary 911 equipment.</p>
Issues for Consideration	107 – 109	
Clarify the Act regarding “distribution to PSAPs” and “distribution to counties” as it would apply to consolidating PSAPs to allow continued distributions to consolidating jurisdictions subject to a continuing obligation to demonstrate 911 funds were spent on statutorily allowed expenditures.	108	The Council agrees that clarification is needed in the Act to address the distribution of funds when a PSAP chooses to consolidate or contract 911 service for their jurisdiction. The Council is creating a working group to consider this issue and provide suggestion for changes to the Act in this regard.



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<p>Increasing the minimum distribution to counties from \$60,000 to a greater amount.</p>	<p>108</p>	<p>The Council agrees that the minimum funding amount of \$60,000 is inadequate for PSAP operations. Data indicates that the \$60,000 minimum granted in 2019 equates to \$72,000 in 2023 dollars and believes that the minimum can be increased to \$80,000 without adverse impact or any additional change to legislation. This would allow minimally funded PSAPs to pay some of the allowable expenses that are currently required to be funded with local general fund dollars and save towards future replacement costs of ancillary 911 equipment.</p>
<p>There is a significant need for more transparent and greater communication between the Council and the PSAPs regarding the Council's investment account balances. The Council's planned use of these reserves and the projections that they will be fully utilized to upgrade and enhance the NG911 system is not broadly understood by the PSAPs and creates concerns among the PSAPs that are in daily struggles with limited budgets. The Council could consider a "road show" or similar communication with PSAPs regarding what are the planned upgrade and feature deployments and there costs to allay concerns over Council stewardship over these funds on behalf of the state public safety community.</p>	<p>108</p>	<p>The Council has created a finance oversight committee made up of legislators and PSAP administrators. As their work progresses communications will be provided from that committee to address some of this concern.</p> <p>The Council's Operations Committee is made up of both council members and non-Council members, all of which are PSAP personnel. This Committee researches potential enhancements to the system and communicates to the PSAP community through weekly bulletins and the annual PSAP Administrators Training Day. The Operations Committee Meetings are open public meetings and notice is provided of all of these meetings.</p> <p>Currently, the Council is conducting a "road show" to provide information to PSAP stakeholders about a planned enhancement to the system.</p> <p>All Council and Council committee meetings are open public meetings and notices of all such meetings are provided. All expenditures, contracts, and budget are openly discussed in those meetings.</p>



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<p>The Council plans continuing communication with the PSAPs regarding the function and utility of the Lightning app that is in development. This is especially important to get PSAP feedback on the extent to which the Lightning app can provide “the same” functionality as the CAD-to-CAD data sharing that PSAPs have expressed priority interest in. While it is still early days in terms of development of the Lightning app it has gained a high profile and priority at the Council and it is not too early for robust communication of the Lightning apps anticipated benefits and user base to PSAPs and other interested entities.</p>	108	<p>The Council’s plans for development and communication regarding the Lightning app include a working group made up of volunteers from responder agencies including law, fire, EMS and PSAPs. Additionally, a pilot project using volunteer PSAPs and their responder agencies will be used to identify and develop functionality of the app and sample policy to guide agencies in the development of policy to utilize the app within guidelines established by the responder agencies and PSAPs. A part of the development of the app will be focused on ensuring that information that needs to be shared between PSAPs for multi-jurisdictional response are included in the features that the app provides. This development is intended to replace the requirement of expensive computer aided dispatch (CAD) interfaces, while still providing the data sharing that is necessary for effective multi-jurisdictional response. Creating a shared solution/product, as opposed to interconnecting numerous disparate CAD systems will be more cost effective.</p>
<p>The PSAP survey demonstrated that PSAPs have definite views of which upcoming i3 features are of most interest and use to them. Especially now that the FCC NPRM lends greater certainty regarding the timing of i3 features and capabilities the Council and staff could broaden and deepen communication with PSAPs on the priority of “beneficial” applications, like CAD-to-CAD data sharing, real time transcription, and TRAINFO.</p>	108	<p>The Council agrees that PSAPs have definite views on the worth of potential enhancements, but unfortunately those views are different PSAP to PSAP based on their needs and environment. It is important to understand that each of these enhancements comes with a cost and applying that to the vast array of demographic makeup of the various PSAPs results in different priorities among them. What may be of great value to one PSAP may hold no value to another. The difficult task is weighing the greater good, system wide, as opposed to individual PSAPs. One method of addressing this task is allowing PSAPs that see value in a certain feature enhancement to share and fund the cost of adding that enhancement to the system. The Council has taken this approach with the addition of Automatic Abandoned Callback (AAC) functionality on the system. The feature is of significant value to large PSAPs and of much less so to small. The enhancement was added to the system and the large PSAPs that chose to use AAC share the cost of adding and maintaining the feature.</p>



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<p>Given the importance of the Business Case financial projections the Council should adopt a structured annual review process which compares the year's financial projection in the Business Case to actual expenditures for that year. Material variances between actual revenues and expenditures for that year and projected Business Case revenues and expenditures should be carefully reviewed for the reasons for the variances which can be used for rolling annual revisions to the Business Case financial projections if warranted.</p>	109	<p>The Council agrees that this is necessary and important and it will be a bi-annual responsibility of the newly formed Finance Committee.</p>