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Notice of Intended Regulatory Action (NOIRA) Agency Background Document

Agency name	Department of Criminal Justice Services
Virginia Administrative Code (VAC) citation(s)	6 VAC20-60
Regulation title(s)	Rules Relating to Compulsory Minimum Training Standards for Dispatchers
Action title	Comprehensive Review of Dispatch Regulations
Date this document prepared	March 24, 2016

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 17 (2014) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual*.

Subject matter and intent

Please describe briefly the subject matter, intent, and goals of the planned regulatory action.

The Rules Relating to Compulsory Minimum Training Standards for Dispatchers (6VAC20-60) identifies the categories of training for compulsory minimum training standards for dispatchers along with the information regarding training schools and the timeline for completing training, grading, and record keeping requirements. This regulatory action is the result of a periodic review. The substantive amendments to the regulation include requiring dispatcher academies to have course work approved by DCJS prior to the first scheduled class and enhancing training by requiring dispatchers complete in-service training. Additionally, revisions to the regulation remove dated language and add clarifying language where appropriate. The regulation identifies broad training categories. The specific performance outcomes, training objectives, criteria for testing, and the lesson plan guides are located on the DCJS website. A reference to the DCJS website has been added to the regulation to assist dispatchers in locating the Virginia Criminal Justice Services Training Manual and Compulsory Minimum Training Standards –Performance Outcomes for Dispatchers. DCJS will review and consider the appropriateness of setting a minimum number of training hours for basic dispatcher training.

Legal basis

Please identify the (1) the agency (includes any type of promulgating entity) and(2) the state and/or federal legal authority for the proposed regulatory action, including the most relevant citations to the Code of Virginia or General Assembly chapter number(s), if applicable. Your citation should include a specific provision, if any, authorizing the promulgating entity to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

§ 9.1-102. Powers and duties of the Board and the Department.

The Department, under the direction of the Board, which shall be the policy-making body for carrying out the duties and powers hereunder, shall have the power and duty to:

1. Adopt regulations, pursuant to the Administrative Process Act (§ 2.2-4000 et seq.), for the administration of this chapter including the authority to require the submission of reports and information by law-enforcement officers within the Commonwealth. Any proposed regulations concerning the privacy, confidentiality, and security of criminal justice information shall be submitted for review and comment to any board, commission, or committee or other body which may be established by the General Assembly to regulate the privacy, confidentiality, and security of information collected and maintained by the Commonwealth or any political subdivision thereof;...

10. Establish compulsory minimum training standards for all dispatchers employed by or in any local or state government agency, whose duties include the dispatching of law-enforcement personnel. Such training standards shall apply only to dispatchers hired on or after July 1, 1988;...

§ 9.1-107. Powers and duties of Director.

A. The Director shall be charged with executive and administrative responsibility to (i) carry out the specific duties imposed on the Department under § 9.1-102 and (ii) maintain appropriate liaison with federal, state and local agencies and units of government, or combinations thereof, in order that all programs, projects and activities for strengthening and improving law enforcement and the administration of criminal justice may function effectively at all levels of government. ...

Purpose

Please describe the specific reasons why the agency has determined that the proposed regulatory action is essential to protect the health, safety, or welfare of citizens. In addition, please explain any potential issues that may need to be addressed as the regulation is developed.

The Rules Relating to Compulsory Minimum Training Standards for Dispatchers identifies the categories of training for compulsory minimum training standards for dispatchers along with the information regarding training schools and the timeline for completing training, grading, and record keeping requirements. Dispatchers are often the first responders to emergency situations. Dispatchers must quickly assess the information provided by an individual contacting 911 and dispatch the appropriate resources while calming victims, gathering additional details to relay to law enforcement, or by providing life saving instructions for CPR or the Heimlich Maneuver. This regulation protects the health welfare and safety of citizens by ensuring dispatchers that are employed by or in a local or state government agency whose duties include dispatching of law-enforcement personnel receive adequate training.

Substance

Please briefly identify and explain the new substantive provisions that are being considered, the substantive changes to existing sections that are being considered, or both.

The substantive amendments to the regulation include requiring dispatcher academies to have course work approved by DCJS prior to the first scheduled class. DCJS will enhance dispatcher training by requiring dispatchers to complete in-service training. DCJS is working with the Dispatcher Curriculum Review Committee, a committee of the Criminal Justice Services Board, to identify how many hours, the types of topics, and how often in-service should be required. Additional revisions to the regulation remove dated language and add clarifying language where appropriate. A reference to the DCJS website has been added to the regulation to assist dispatchers in locating the performance outcomes, training objectives, criteria for testing, and the lesson plan guides. DCJS will review and consider the appropriateness of setting a minimum number of training hours for basic dispatcher training.

Alternatives

Please describe any viable alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in § 2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulation.

There are no viable alternatives. Section 9.1-102 (10) of the Code of Virginia requires the Department of Criminal Justice Services and the Criminal Justice Services Board to establish compulsory minimum training standards for all dispatchers employed by or in any local or state government agency, whose duties include the dispatching of law-enforcement personnel.

Public participation

Please indicate whether the agency is seeking comments on the intended regulatory action, including ideas to assist the agency in the development of the proposal and the costs and benefits of the alternatives stated in this notice or other alternatives. Also, indicate whether a public hearing is to be held to receive comments. Please include one of the following choices: 1) a panel will be appointed and the agency's contact if you're interested in serving on the panel is _____; 2) a panel will not be used; or 3) public comment is invited as to whether to use a panel to assist in the development of this regulatory proposal.

The agency is seeking comments on this regulatory action, including but not limited to: ideas to be considered in the development of this proposal, the costs and benefits of the alternatives stated in this background document or other alternatives, and the potential impacts of the regulation.

The agency is also seeking information on impacts on small businesses as defined in § 2.2-4007.1 of the Code of Virginia. Information may include: projected reporting, recordkeeping, and other administrative costs; the probable effect of the regulation on affected small businesses; and the description of less intrusive or costly alternatives for achieving the purpose of the regulation.

Anyone wishing to submit written comments for the public comment file may do so by mail, email or fax to Barbara Peterson-Wilson, address: 1100 Bank Street, 12th Floor, phone number: 804-225-4503, fax number: 804-786-0410 and email address: Barbara.Peterson-Wilson@dcjs.virginia.gov. Comments may

also be submitted through the Public Forum feature of the Virginia Regulatory Town Hall web site at: <http://www.townhall.virginia.gov>. Written comments must include the name and address of the commenter. In order to be considered, comments must be received by 11:59 pm on the last day of the public comment period.

A public hearing will not be held and a panel will not be used following the publication of this stage of this regulatory action.

Periodic review and small business impact review report of findings

If this NOIRA is the result of a periodic review/small business impact review, use this NOIRA to report the agency's findings. Please (1) summarize all comments received during the public comment period following the publication of the Notice of Periodic Review and (2) indicate whether the regulation meets the criteria set out in Executive Order 17 (2014), e.g., is necessary for the protection of public health, safety, and welfare, and is clearly written and easily understandable. In addition, as required by 2.2-4007.1 E and F, please include a discussion of the agency's consideration of: (1) the continued need for the regulation; (2) the nature of complaints or comments received concerning the regulation from the public; (3) the complexity of the regulation; (4) the extent to which the regulation overlaps, duplicates, or conflicts with federal or state law or regulation; and (5) the length of time since the regulation has been evaluated or the degree to which technology, economic conditions, or other factors have changed in the area affected by the regulation.

The following agency response was sent to each individual who submitted a public comment.

Thank you for taking an interest in the regulatory process and for providing the Department of Criminal Justice Services (DCJS) and the Criminal Justice Services Board with your public comments. DCJS is in the process of reviewing the public comments and researching the various issues that were raised related to 6VAC20-60 which is subject to the requirements of the Virginia Administrative Process Act.

Commenter	Comment	Agency response
Kenneth Fowler, City of Fairfax	"I believe that dispatchers in Virginia should be required to attend a minimum of 40 hours of in service and refresher [refresher] training to update their knowlege [knowledge] and skills beyond general instructor and VCIN training. Our jobs in this day and age are much more complicated. due to increased use of technology and greater demand for services beyond what traditional police services existed when the orginal [original] training standards were developed."	
Jason Malloy, Shenandoah County Dept. of Emergency Communications	Increased Training Needed In today's day and age, the provision of 9-1-1 services to the community [community] are drastically different than they were just a few years ago, and will be even more drastically changed as Virginia (and the country as a whole) move towards making NextGen 9-1-1 a reality. Technology, procedures, liabilities, etc. all change in the blink of an eye for public safety, and Public Safetey [Safety] Telecommunications is no different. As an industry, the miminum [minimum] requirement of 40-hours of training from DCJS with no recertification requirements is simply not enough training. To make	

	<p>matters worse, agencies who do not answer the calls for Law Enforcement are not held to the standard and are therefore not held accountable to the standard (potentially decreasing the level of service provided to some citizens in the Commonwealth.)</p> <p>First and foremost, the number of hours needs to be increased. 40 hours simply isn't enough time to teach everything that needs to be taught to provide the best level of service to the citizens. As an example, the State of Florida changed their legislation within the past 2-3 years to require more training for public safety telecommunications. At the present time, the Florida standard is to consist of not less than 232 hours. The curriculum is run through the Florida Department of Education, with testing performed by the Florida Department of Health (similar to how EMTs and Paramedics are tested.) The full website [website] can be found here http://www.floridahealth.gov/licensing-and-regulation/911-public-safety-telecommunicator-program/index.html. There are several other states with very similar requirements and legislation. The Association of Public Safety Communication Officials (APCO) has already worked to create a baseline/example legislation that could very easily be tweaked for the Commonwealth of Virginia.</p> <p>The second issue with the training program as it stands is the lack of a recertification requirement for Public Safety [Safety] Telecommunications. Law Enforcement Officers, Basic Jailors and Animal Control Officers are all certified by DCJS and are required to perform a certain number of in-service hours each two-year period. This is done so that they may presumably remain current on the law, new ways of handling situations, etc. etc. etc. With the speed at which Public Safety [Safety] Telecommunications is changing, the new liabilities that are faced with each passing year, etc., those in this industry must participate with a certain level of professional development to remain current. With the advent of NextGen 9-1-1, these changes will be even more drastic with no current requirement to remain current.</p> <p>It is essential that DCJS along with other stakeholders within the Commonwealth (e.g. 9-1-1 Services Board, Virginia Departments of Health, Education, Fire Programs, Transportation and other stakeholders such as Virginia Chapters of APCO and NENA [National Emergency Number Association], Virginia State Police, etc.) work to develop a training curriculum and accompanying legislation that allows for a more well-rounded, professional certification program to better serve the citizens of the Commonwealth.</p>	
<p>Melissa D. Foster, Lynchburg Department of Emergency Services</p>	<p>Rules Relating to Compulsory Minimum Training Standards for Dispatchers Several items that should be addressed in the training standards update are: Emergency Communications Technology-dispatchers are using numerous technologies on a daily basis to ensure that citizens are receiving the necessary services. The technologies are continuously changing and it is imperative that they have a basic understanding of how the systems work. This includes wireless devices, next generation 911 equipment, computer aided dispatch (CAD), GIS, and radio networks.</p> <p>Crisis Intervention Team (CIT)-it is important the dispatchers understand early on the complexities of dealing with those that are experiencing mental and emotional crises. Mandatory Continuing Education-the job responsibilities for dispatchers have grown and changed through the years and will continue to do so in the future. Mandatory continuing education for</p>	

	<p>dispatchers will help to ensure that the work force is remaining informed about new and emerging topics within the industry.</p>	
<p>Charlie Udriet, Deputy Director, Hanover County 911</p>	<p>Training Standards The current training standards need to be supplemented by on-going training. Having set minimum standards is fine, but the required hours toward certification needs to increase from 40 hours to at least 80 hours. Currently there is no requirements for on-going training and certifications for dispatchers. The State should mandate either annual or bi-annual recertification standards with required in-service training hours for all dispatchers. Also the term dispatcher needs to be replaced with Public Safety Emergency Communications Officer to better reflect the job duties and essential functions required of a dispatcher. The role of the dispatcher has become more technical, more stressful and more demanding. The training standards needs to reflect that the job is more than a clerical position - that answers a phone and talks on the radio - it is a highly technical profession and needs to be treated as a public safety essential function that is indeed a profession not just a stepping stone job toward other areas of public safety.</p>	
<p>Curt Shaffer, Director, Hanover County Emergency Communications Department *</p>	<p>Rules Related to Compulsory Minimum Training Standards for Dispatchers [6 VAC 20-60] Hanover County, Virginia supports the establishment and adoption of a more comprehensive public safety training standards than are currently promulgated through the DCJS compulsory minimum training standards. Specifically, the Association of Public Safety Communications Officials, International (APCO) has published a series of comprehensive training manuals and guidelines that are outstanding resources. Hanover recommends that the DCJS consider the incorporating APCO's Minimum Training Standards for Public Safety Telecommunicators as part of the review process. These recommended minimum training standards for new public safety communications officers include standards that address the tasks of public safety call taking, emergency medical dispatch, fire dispatch, as well as law dispatch, thereby creating a baseline making the current Commonwealth training standards more comprehensive and thereby addressing all aspects of public safety dispatch. Also, the current DCJS standards lack requirements regarding on-going in-service training. The APCO curriculum, Minimum Training Standards for Public Safety Telecommunicators includes a requirement for annual in-service training. Finally, Hanover County, Virginia supports the efforts of the Virginia APCO ProCHRT (Professional Communications Resource) Committee and the recommendations submitted on behalf of Virginia APCO. While overall the regulations and standards included in the DCJS Rules to Compulsory Minimum Training Standards for Dispatchers have served localities and those personnel serving as Public Safety Telecommunicators in dispatch centers adequately in the past, there is an opportunity and a need to update and amend the curriculum and other aspects of the standards.</p>	
<p>Mary Colt, Shenandoah County Dept. of Emergency Communications</p>	<p>Training Standards I believe that the current standard of 40 hours of training for Dispatchers is not nearly enough. We have very demanding and complex jobs, with a high level of liability. We are responsible for numerous people at all times and 40 hours is not enough time to ensure that someone is properly trained. There should also be in-service training requirements. Our technology is ever changing and there should be a system in place to make sure that we are receiving the newest information [information].</p>	

<p>Melissa Williams, Training Coordinator, City of Roanoke E911 Center</p>	<p>Compulsory Minimum Training Standards for Dispatchers The currently required 40 hour dispatcher training academy is no longer an appropriate amount of time for minimum training. I strongly urge that this time frame be reconsidered to at least an 80 hour academy. As a DCJS General Instructor who actively participates in instructing this course twice a year, I can attest that we have to race through information to cover the materials adequately before testing. The curriculum desperately needs to be updated overall and with the addition of specific instruction given in the areas of call taking and dispatching for Fire and EMS calls for service. The addition of training related to dealing with the mentally ill and more thorough training on Critical Incident Stress Management (CISM) also needs to become mandatory. A minimum of an 80 hour academy would also give additional time for thorough practical testing. The DCJS required "On the Job" tasks check off sheet should remain as part of the curriculum to ensure trainees are being taught basic skills at their home jurisdiction on the equipment utilized by their departments. There are many states that still have no minimum training requirements for telecommunicators and I am proud of the fact that Virginia has a long history of these training requirements [requirements] but we cannot become complacent in our expectations or teachings. Lastly, I believe the term "dispatcher" should be changed to "Telecommunicator" as that is the professional [professional] title given to this career field. Thank you for your considerations,</p>	
<p>Jolena Young, Twin County 911 Regional Commission (Galax/Grayson/Carroll)</p>	<p>Training Standards for Dispatchers Public Safety Telecommunications is experiencing significant change with the transition into Next Generation (Internet Protocol) technology. Procedures and Equipment will be more fluid in the emerging IP environment. As such, not only is initial training important, there is a real need for mandatory Continuing Education. Also the term dispatcher needs to be replaced with Public Safety Emergency Communications Officer to better reflect the job duties and essential functions required in a 911 Communications Center. Virginia should compare the existing curriculum to APCO's training which is nationally recognized as meeting minimum training standards. It may be more cost effective to incorporate APCO's training materials into the DCJS program which would include built in periodic updates. The current curriculum is Law Enforcement centric. The program should incorporate additional training based on input from key EMS and Fire organizations to prepare Telecommunicators for the full scope of the job. These comments are my own, and are not intended to represent the opinions of local law officials [officials] or administrators</p>	
<p>Brad Nester, Pulaski County 9-1-1 Center</p>	<p>I believe that the current 40 hr instructional period be extended to 80 hrs. The training should include the day to day systems we all use including but not limited to GIS, CAD (generic of course), radio systems and Next Gen technology [technology]. The current curriculum [curriculum] is way outdated and needs to run with current technologies [technologies]. The term Dispatcher needs to be replaced with Public Safety Telecommunicator.</p>	
<p>Jeffrey Flournoy, ESVA 9-1-1 Commission, Virginia APCO ProCHRT Committee</p>	<p>Comments - Review of Rules Related to Compulsory Minimum Training Standards for Dispatchers The below comments are submitted on behalf of Virginia APCO ProCHRT (Professional Communications Resource Committee), with</p>	

	<p>the consent of the Virginia APCO Executive Board. The composition of this committee includes representatives from eight 9-1-1 Centers' in our state, both large and small, urban and rural. While overall the regulations and standards included in the DCJS Rules to Compulsory Minimum Training Standards for Dispatchers have served localities and those personnel serving as Public Safety Telecommunicators in dispatch centers adequately in the past, there is opportunity and a need for revision or amendments to both the curriculum and other aspects of the standards.</p> <p>These opportunities for revision or amendments include, however may not be limited to, the following:</p> <p>A potential approach (whether in place of or in conjunction with the current DCJS curriculum) would be to explore using an ANSI approved training standard as a standard for compulsory minimum training standards for Public Safety Telecommunicators. This would assure the material remains current with the ever increasing technology changes and demands occurring on dispatch floors in our state. An example for potential consideration is the ANSI approved APCO curriculum, Minimum Training Standards for Public Safety Telecommunicators (APCO ANS 3.103.2.2015). This standard covers much of the curriculum included in the current DCJS curriculum, as well as numerous other dispatch related training needs not addressed in the current DCJS curriculum used in Virginia.</p> <p>The current DCJS standards lack any requirement or expectation for on-going or in-service training. The reality is those working in dispatch centers answering 9-1-1 calls and/or dispatching emergency services are part of the public safety community and disciplines. Needed on-going/in-service training should occur in this area of public safety as occurs in other areas of public safety, such as law enforcement and emergency medical services. The APCO curriculum, Minimum Training Standards for Public Safety Telecommunicators includes a requirement for on-going/in-service training.</p> <p>The language in the current DCJS standards does not address dispatch centers and dispatch staff whose duties do not include law enforcement dispatch responsibilities. While it is expected dispatch staff whose primary focus is duties and responsibilities other than law enforcement dispatch do receive needed training, it is not required in the current standard. The standard should address other facets of dispatch floor duties and responsibilities; such as those dispatch centers and their staff whose primary function is the processing of 9-1-1 calls and/or the dispatching of fire and/or emergency medical services.</p> <p>If the DCJS curriculum continues to be used as the standard for compulsory minimum training standards for dispatch staff, and another curriculum is not used that is regularly updated, there needs to be mechanisms to assure the current information/curriculum being used to educate new Public Safety Telecommunicators is as up-to-date and comprehensive as possible. This will provide a higher level of service to those who truly depend of our state's dispatch centers and those Public Safety Telecommunicators serving in these dispatch centers; this includes both the public and those serving in the field, such as law enforcement officers, firefighters, and EMT's.</p> <p>To summarize, writing on behalf of the Virginia APCO ProCHRT Committee, as enumerated above there is need and opportunity to revise and ultimately improve the current DCJS standards for the Compulsory Minimum Training Standards for Dispatchers.</p>	
<p>Melissa Wood, City of Fredericksburg Police Department *</p>	<p>Review of Rules Relating to Compulsory Minimum Training Standards for Dispatchers</p> <p>My comments echo those of other PSAP communities. We need to incorporate more to prepare these individuals for what may come, as</p>	

	<p>it is all too often that the only training received is in the academy. Adding more specialty or in-depth classes will produce a more versatile employee. Bringing back components of EMD, incorporating more on crisis intervention (CIT), and including fire and rescue services would prove to be beneficial as they are fundamentals in many centers. Inclusion of CPR and NCIC/VCIN certification, as optional courses, would begin building the necessary foundation for a multi-disciplined Communications Officer. However, with varying vendors for CPR and EMD, this may be where the precedence must be set.</p> <p>Additionally, and again already a core concern, is the need for mandated continuing education. With the ever evolving political/social climate and technological advances, this would ensure that those remaining in this professional field are not left behind.</p>	
<p>Sgt. Chad Kauffman, City of Staunton Police Department</p>	<p>Training Standards The work done by emergency communications officers continues to become more complex. The minimum training standards should be changed (increased) to reflect the required knowledge, skills and abilities, particularly in the area of technological competencies, working with the mentally ill, and effectively managing stress. Continuing education requirements should also be established to ensure these competencies are maintained, as is already done with law enforcement, fire and EMS. This would require providing support to regional academies to ensure adequate opportunities for recertification classes exist. Currently, professional [professional] development courses are few and far between for emergency communication officers.</p>	
<p>Fauquier County Sheriff's Office *</p>	<p>DCJS Communications Curriculum My comments echo those of the APCO board and the PSAP communities. The curriculum needs to be consistent across the Commonwealth and it needs to be reviewed annually as emerging technologies are changing the scope of the emergency communications officers. Academies offer communications basic classes several times a year; however, many times a communications officer has been working behind a radio for up to two years before they have an opportunity to attend an academy. Some centers are able to provide in house training utilizing training programs such as APCO which offer more in-depth training than currently provided by DCJS. These in house programs are augmented with agency specific training as well as hands on training of the equipment they will be utilizing. I support the APCO board's recommendation to allow these agencies an avenue for training curriculum approval and DCJS credit. In service and continuing education is another area lacking for communications officers. Again, technology, social and political changes, and other job requirements are ever changing and communications officers should be required to receive a certain number of continuing education credits per year. The continuing education courses at many academies are limited to general instructor. DCJS requirements would encourage the academies to provide the training. In this area, smaller agencies are reluctant to send staff to training focusing on the overtime for back filling seats. DCJS could also consider other training avenues as in service credits. DCJS requirements would encourage agencies reluctant to offer such training to communications officers. It is important that communications officers stay abreast of current technologies and issues.</p>	
<p>Kathy Richardson, Charlottesville-UVA-</p>	<p>Training Standards First, dispatchers should be recognized as an integral part of public</p>	

<p>Albemarle County ECC</p>	<p>safety and their job title should reflect that. They should be called Public Safety Communications Officers. Their job has gotten much more complex over the years with the emerging technologies, wireless devices and Next Gen 911. It is vital that emergency communications staff receive essential training hours to meet, maintain and enhance their job skills and reduce liability. The minimum required training for all public safety [safety] communications personnel should be at least 80 hours to start with and additional in-service training should be required every 2 years. (It makes no sense to require police, fire and rescue personnel to meet specific ongoing training requirements but not emergency communications personnel. They are the first link in public safety and how they respond directly impacts the outcome of every call.) We strongly recommend that DCJS implement the APCO minimum [minimum] training standards for public safety communications officers. Currently agencies that dispatch for law enforcement are held to a training standard that fire/rescue agencies do not have to meet. It would make sense to have all emergency communications fall under one central agency and meet the same state-wide training requirements and standards. Furthermore, all agencies that dispatch for fire/rescue should be required to certify their staff in emergency medical dispatch. The Charlottesville-UVA-Albemarle County Emergency Communications Center supports the efforts of the Virginia APCO ProCHRT committee and the recommendations submitted on behalf of Virginia APCO.</p>	
<p>Nicola Tidey-Director, Orange County Emergency Communications Center *</p>	<p>In July 2015, the E-911 Services Board published its Statewide 9-1-1 Comprehensive Plan. The plan outlines the Vision of 9-1-1 in the Commonwealth recognizing that “In Virginia, 9-1-1 personnel, resources and systems provide the public-using any communications device, and in any language- with rapid, reliable and accurate emergency response.” (http://vita.virginia.gov/uploadedFiles/VITA_Main_Public/ISP/E-911/2015/2015CP.pdf) In essence, the vision is to provide every community in the Commonwealth with access to public safety communications that is proffered by individuals who are trained to meet expectations of competency in call-taking and dispatching functions. Furthermore, the E-911 Wireless Services Board in 2014 supported an initiative to conduct a feasibility study on the 9-1-1 services in the Commonwealth (http://vita.virginia.gov/uploadedFiles/VITA_Main_Public/ISP/E-911/2015/FS_Revised.pdf). All, 121 PSAPs participated in the analysis reporting on the state of 9-1-1. During the process, specific to DCJS, training was identified as being a key component in developing the human aspect of providing high-quality 9-1-1 services. The comprehensive report advises that as a goal Virginia must “Position PSAPs to better respond to emergencies through professional development of 9-1-1 and technical personnel.” (http://vita.virginia.gov/uploadedFiles/VITA_Main_Public/ISP/E-911/2015/2015CP.pdf) In addition, pursuant to 9.1-102 Powers and Duties of the Board and the Department Section 12, The Department will “Consult and cooperate with counties, municipalities, agencies of the Commonwealth...concerning the development of police training schools and programs course of instruction.” We are hoping with work with DCJS and our stakeholders to review the current DCJS Rules Relating to Compulsory Minimum Training Standards for Dispatchers [6 VAC 20-60].With the rapid changing climate of public safety training must be adapted to meet pace with the vision of 9-1-1 in the Commonwealth.</p>	

	<p>For your consideration (see below for further explanation or information):</p> <ol style="list-style-type: none"> 1. The DCJS requirements identified for training dispatchers is woefully inadequate and lacking in content. 2. The ANSI published standard for Minimum Training Standards for Public Safety Telecommunicators APCO ANS 3.103.2.2015 is an in-depth training standard that was developed by the Association of Public Safety Communications Official (APCO) following the ANSI accreditation guidelines. The result is a comprehensive training standard that is current to public safety telecommunicators that would promote training for dispatch staff in Virginia. <ol style="list-style-type: none"> a. With the fast-pace of changes to protocols due to community changes, technology changes, and future technologies anticipated, many of which will change the face of the profession, the curriculum is not keeping pace. <p>i. Example Text to 9-1-1. In January 2015, the Virginia E-911 Services Board adopted a white paper detailing Text- to-9-1-1. Text to 9-1-1 has been deployed in approximately 20 % of the Commonwealths PSAPs. http://vita.virginia.gov/uploadedFiles/VITA_Main_Public/ISP/E-911/2015/WPFINV3.pdf</p> <ol style="list-style-type: none"> ii. Further examples would be in incorporate training for domestic violence, active shooter situations. Work with VA OEMS in regards to EMD training. iii. Recommendation for change (these are some examples but by no means just limited too) <ol style="list-style-type: none"> 1. Update Chapter 1 Communication and include current call delivery methods such as for example but not limited to Text to 9-1-1, VoIP, NG-9-1-1 systems. 2. Additionally, update Chapter 1 with more current call type situations such as for example but not limited to the Domestic violence, Active shooter type scenarios. 3. Acronyms contained should reference published standards that are current with the terminology in dispatch such as NIMS, ICS, NENA Master Glossary https://c.ymcdn.com/sites/www.nena.org/resource/resmgr/Standards/NENA-ADM-000.18-2014_2014072.pdf). APCO ANSI 3.103.2.2015 Minimum Training Standards for Public Safety Telecommunicators (https://www.apcointl.org/standards/apco-standards-for-download.html#training) 4. Update Chapter 5- OTJ section to also include current call delivery methods as applicable. 5. Update Chapter 5 OTJ section to also include current call type scenarios. 6. Include current technologies such as but not limited to GIS Systems, mass notification systems etc. <p>*Again, please note these are some but not all areas of the current standard that should be reviewed. Upon review more detailed examination would be conducted.</p> <ol style="list-style-type: none"> 3. There are many dispatchers throughout the Commonwealth who, if they do not work directly for a law enforcement agency, are not required to be “certified” yet they answer and/or respond to 9-1-1 calls. <ol style="list-style-type: none"> a. Specifically, Orange County Emergency Communications Center answers all 911 calls for the County of Orange, however, we only dispatch Fire and EMS services. 9-1-1 calls for Law Enforcement are queried and then transferred to Law Enforcement for dispatch. b. Orange County Emergency Communications Center (Orange E-911) recognizes though that a person dialing 9-1-1 for Law enforcement expects a consistent level of service. The level of service 	
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	<p>delivered by 9-1-1 must never falter. In response to this need for excellence, Orange E-911 has developed an accredited training program to promote the level of excellence that the public demands from 9-1-1 professionals. This is in addition to the DCJS required minimums because they inadequately do not support our needs.</p> <p>i. Recommendation for change</p> <ol style="list-style-type: none"> 1. DCJS should broaden its perspective to require mandatory training for all professionals who answer 9-1-1 calls regardless if the PSAP answering the call only dispatches Fire/EMS. All 9-1-1 professionals must be able to process any type of 9-1-1 calls in a quick and proficient manner. 2. Change DCJS Rules Relating to Compulsory Minimum Training Standards for Dispatchers to DCJS Rules Relating to Compulsory Minimum Training Standards for Public Safety Telecommunicators more accurately depicting the differing functions of public safety communications in Virginia. <ol style="list-style-type: none"> 2. The public safety communications professional is at the core of every public safety response. In addition to taking 9-1-1 calls, they orchestrate the response while monitoring and supporting the responders and the community until the emergency has been addressed. 3. Whether taking a 9-1-1 call or monitoring/supporting the response, each and every component is critical to the response. It does not end with the receipt of a 9-1-1 call but continues through a tremendous amount of policies, protocols and monitoring. Whether supporting law enforcement or fire/rescue responses, these individuals fulfill a critical role in the public safety response. The emergency response is not contained within a single discipline, but originating with 9-1-1 while carried through to the appropriate response. 4. Such an approach further supports the adopted Vision of 9-1-1 in the Commonwealth. 4. Support for some degree of in-service/on-going training expectations/requirements needed after initial introductory training. <ol style="list-style-type: none"> a. Justification: <ol style="list-style-type: none"> i. The knowledge of this industry is ever changing to keep up with technology and the applications used as a result are constantly challenging the professional to keep up and to use technologies to support the public safety response. ii. Many of the current and future technologies will put many opportunities in the hands of the communications professional which will change the face and manner in which emergencies are handled. iii. Whether a new dispatcher or a seasoned professional, complacency can create the worse outcomes; refreshing the basics is as critical in this profession as any other within public safety. Complacency has proven to have devastating consequences, many of which make the front page of the national news. This is a central theme that is recognized by DCJS is many other of its training programs. iv. In-service/On-going training can be completed in-house, thereby minimizing the cost to the agency. v. The APCO ANSI standard requires continuing education, most of which are not cost prohibitive (e.g. read professional publications, utilize developed review articles with associated quizzes, reviewing in-house policies, procedures, and protocols, etc.) 5. Support a statewide curriculum, consistent across the Commonwealth that is reviewed regularly to ensure it is current. <ol style="list-style-type: none"> a. Justification: <ol style="list-style-type: none"> i. The current DCJS requirements do not include significant call 	
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	<p>delivery methods, as they are out-of-date.</p> <p>ii. Adopting or utilizing an existing training standard that is updated on a regular basis could be reviewed within a similar cycle to ensure all training components remain current.</p> <p>iii. Stock should be taken to ensure that classes are taught</p> <p>iv. There could be dynamic ways in which training could be delivered; let's explore those and improve the delivery and caliber of training, consistent to ensure training is not the weakest link of public safety communications in the Commonwealth.</p> <p>v. There are courses available, at a cost, that follow the established standard for the training of staff while supporting cost saving measures in keeping the dispatchers in the locality.</p> <p>vi. Protocols for all facets of public safety communications are available. The dynamics of emergencies within our communities have changed tremendously since the DCJS became the home of training requirements dispatchers. Times have changed and the training no longer is adequate or keeps up.</p> <p>The overall recommendation is DCJS in conjunction with its stakeholders review the current DCJS Rules Relating to Compulsory Minimum Training Standards for Dispatchers [6 VAC 20-60] and expand upon the content that is included today. By taking such steps, DCJS would be fostering relationships and developing a curriculum that is comprehensive in nature and falls in line with ANSI published standards for Minimum Training Standards for Public Safety Telecommunicators APCO ANS 3.103.2.2015 and ultimately matches the vision of 9-1-1 in the Commonwealth by providing citizens with access to rapid, reliable and accurate emergency response, from any device and in any language.</p>	
<p>Nicola Tidey- President VA APCO *</p>	<p>This comment is provided by the Virginia Chapter of APCO International, the Association of Public Safety Communications Officials. Virginia APCO represents public safety professionals who support operate, manage, and support the emergency communications ecosystem, beginning with every 9-1-1 call, and working through the response with public safety radio systems, computer aided dispatch, and myriad technologies and protocols to manage the response.</p> <p>Every community in the Commonwealth deserves individuals who are trained to meet expectations and competencies to assure the quality and consistency of public service each and every time an emergency occurs. Classroom training is one of the key elements for providing the baseline level of knowledge for every public safety communications professional. On-the-job training (OJT) is the other key element that is paramount in applying the knowledge obtained through classroom training.</p> <p>Pursuant to Executive Order Number Seventeen (2014) "Development and Review of State Agency Regulations, "General Principles" it states, "...agencies shall consider: (3) [t]he use of performance standards in place of mandating specific techniques or behavior and (4) [t]he consideration of reasonably available alternatives in lieu of regulation."</p> <p>Where necessary, the Executive Order also strives to have regulations which are "clearly written and easily understandable" and "designed to achieve their intended objective in the most efficient, cost effective manner."</p> <p>The current DCJS Rules Relating to Compulsory Minimum Training Standards for Dispatchers [6 VAC 20-60] can be improved upon to provide comprehensive and needed training opportunities in a more efficient and cost-effective manner than currently exists in the Commonwealth.</p> <p>For your consideration (see below for further explanation or information):</p>	

	<p>The DCJS requirements identified for training dispatchers are substantially inadequate and lacking in content.</p> <p>With the fast-pace of changes to protocols due to community changes, technology changes, and future technologies anticipated, many of which will change the face of the profession. The curriculum is not designed to keep up with the fast-paced changes to operational protocols (reflecting community changes and needs,) or technology changes and advancements, many of which will considerably alter the profession.</p> <p>There are many dispatchers throughout the Commonwealth who, if they do not work directly for a law enforcement agency, are not required to be “certified” yet they answer 9-1-1 calls and manage emergency responses.</p> <p>Many localities provide internal training that meets and exceeds the DCJS requirements, yet additional expenses to the locality are incurred because they must attend an academy to be certified. In addition, dispatch resources for many localities are an invaluable commodity that cannot be spared.</p> <p>Since many localities meet and exceed the DCJS requirements, if proof can be shown, why make them attend an academy? In addition, many are answering, responding to and managing resources as a fully functional dispatcher before they are “certified,” performing a functional role without the “required” training for up to two years.</p> <p>Some suggestions in expanding on the above are identified below: Allow dispatch personnel (Telecommunicators) in our state to use the ANSI-approved APCO training standards as a basic class for introductory dispatch personnel (either in place of the current DCJS standards/certification or along with the DCJS standards/certification). Justification: This is a potential cost savings for some agencies. If they can use the APCO Basic Telecommunicator class, then several options open up to agencies for getting this certification for its staff. Regional academy staff (still compensated by the locality unless a “certified academy site”) could be utilized to monitor and insure compliance. Support some degree of in-service/ongoing training expectations/requirements after initial introductory training. Justification: The knowledge of this industry is ever-changing to keep up with technology and community requirements. The applications used and protocols applied as a result are constantly challenging the professional to keep up to support the public safety response. New and current technologies are changing the face of public safety communications and will challenge telecommunicators to think and operate in new and complex ways to synthesize and manage multiple streams of incoming and outgoing information. Whether a new dispatcher or a seasoned professional, complacency can be create the worst outcomes. Refreshing the basics is as critical in this profession as any other within public safety. Complacency has proven to have devastating consequences, many of which make the front page of the national news. In-service/ongoing training can be completed in-house, thereby minimizing the cost to the agency. Reduced travel keeps telecommunicators in their home agencies and ready to work. The APCO ANSI standard requires continuing education, most of which is not cost prohibitive (e.g. read professional publications, utilize developed review articles with associated quizzes, reviewing in-house policies, procedures and protocols, etc.)</p> <p>Support every public safety communications professional throughout the Commonwealth to receive the same level of training.</p>	
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<p>Cheryl F. Buchanan, Hanover County Public Safety Communications</p>	<p>Training Standards for Communications Officers The Compulsory Training Standards for Dispatchers could be improved. Overall it is not the standard that is problematic but the manner in which the materials are delivered. There is not one set timeline; if all standards can be completed in an 8 hour period then that is okay; but certainly not effective. Due to the variation in agencies the standards are a challenge to present DCJS gears the majority of their program to Law Enforcement with a hint of Fire/EMS. Each training academy sets up their curriculum as they see fit and with that their consumer's needs will be taken into consideration verses the importance of the materials being provided to each respective student, i.e. a small locality that does not dispatch Fire/EMS does not want their Communications Officer in a classroom for the two extra days that may be dedicated to Fire/EMS education. Knowledge is power; the more vast the information the more of an educated decision a Communications Officers can make. Standards to include; training materials, i.e. universal power points, instructor lesson plans, textbooks, and universal audio visual aids would be a tremendous asset to the student and the teacher. There are many</p>	

	<p>vendors that have put together programs for the front line Telecommunicator; these programs show it can be done. If DCJS does not wish to endorse one vendor over another then provide all of them upon review of their materials to ensure they meet VAC/DCJS Compulsory Standards.</p> <p>Training beyond the basic school is also important. Someone who came into this career field 20 years ago attended a basic school that is nothing like those of today in most cases. There should be some accountability for maintaining those skills; through in-service requirements. These requirements can include a basic re-certification or enhanced training such as Haz Mat Awareness or Domestic Violence Training and those are just a few.</p> <p>It think that VA APCO wants to be an active part of the process as they understand the importance of training and to ensure that we are all receiving the same information is imperative and the only way to do that is through standardized curriculum.</p>	
<p>Carol Adams, Stafford County Sheriff's Office</p>	<p>Compulsory Minimum Training Standards for Telecommunicators</p> <p>The responsibilities of the "Telecommunicator", the impact of their job, and the skills necessary to perform the job have long surpassed the curriculum provided through DCJS. I have outlined below more details to support this statement.</p> <p>The current training program is outdated and is not solely inclusive of the broad job duties & responsibilities of the Telecommunicator.</p> <p>Suggestion: Insure a committee of public safety professionals from around the Commonwealth have significant input into the "requirements" and stress further to members of the Board the importance of training. I would refer you to the case of Denise Amber Lee, a mother of 2 small boys, who was tragically killed in Florida several years ago - training, coupled with the lack of any re-certification program or on-going training/in-service, played a significant role in the tragedy.</p> <p>The training program is not consistent across the Commonwealth as each training academy views the curriculum and defines the training individually. As such, some academies are more comprehensive than others. Some provide a very comprehensive effort being inclusive of fire and ems responses which is the responsibility of many PSAPs across the Commonwealth. Suggestion: Adopt the APCO Minimum Training Standard for Telecommunicators to be the basis for any training program (go to www.apcostandards.org). This standard is updated, at a minimum of every 3 years; as such it remains up-to-date on current events and technologies. The work is already done, let's just use it. Have a panel review the standard to insure it meets any curriculum / requirements that are current or will be established by the Commonwealth. If it does, why re-invent the wheel.</p> <p>One of the "guiding principles" defined in Executive Order 17 (2014) paragraph "D" states, Regulations shall be designed to achieve their intended objective in the most efficient, cost effective manner."</p> <p>Stafford provides a comprehensive training program, certified as meeting the national standard and is inclusive of the Commonwealth's requirements, but we must take staff away from the work environment to attend the regional academy placing a fiscal burden on the locality with overtime compensation and loss of a trained Telecommunicator.</p> <p>Suggestion: adopt the national standard for training Telecommunicators & accept the national certification associated with that standard as the agency being in compliance or adopt the national standard and have the local agency show proof to the regional academy, who then reviews the proof, of compliance. This would retain repsonsibility [responsibility] within the regional academy, but if the locality is training to the national standard which meets and exceeds the Commonwealth's curriculum, then accept that as certifying the Telecommunicator without their physical attendance at a</p>	

	<p>regional academy. I could write a book, but I am hoping my point has been made. Training and on-going training is critical in public safety communications. It is an ever-changing environment that cannot be taught from a code book or how-to book. The individual is a skilled public safety professional deserving of training that provides them with the tools and knowledge to perform their job. We are duplicating efforts and taking away valuable resources from our communications center to send an individual to the academy (they have already spent 6 weeks in an agency academy and have spent more than 800 hours of OJT). With an environment that is always taxed for personnel resources, this not only lends itself to a fiscal impact, but also greatly impacts the manpower available to do the job. Your consideration is appreciated.</p>	
<p>Preston Hill, Training Supervisor, Richmond Dept of Emergency Communications *</p>	<p>Rules Relating to Compulsory Minimum Training Standards for Dispatchers I feel the minimum compulsory training standards are a bit outdated, and redundant in areas where the training objectives have us restating areas in the radio operations section that had been previously covered in the telephone operations section (i.e. basic information required to dispatch police, fire and EMS). I think this redundancy adds to the training time, and doesn't focus on the instructional material. They also seem to be a little disjointed, the criteria goes from talking about the aforementioned basic information, into identifying characteristics of a person in crisis, which just doesn't seem to flow well. I also think the objectives need to be updated to reflect the growth/advancements in technology in the 9-1-1 field (i.e. text to 9-1-1).</p>	
<p>Steven Powers, Dickenson County Emergency Communications Center</p>	<p>Compulsory Minimum Training Standards for Dispatchers I strongly feel the 40 hour training period is no longer adequate, the job has changed immensely and the training period nor the content are sufficient. Current training is heavily law enforcement centric, and for agencies that provide services to multiple disciplines, its imperative that EMS, and fire training be included as an option. The Offices of Emergency Medical Services and Fire Programs should have a vested interest in the development of such programs as they have been neglected for far too long. In addition basic training of GIS, two way radio and computer systems and we move to next generation will make a much more rounded and confident communications officer. Once a well trained and confident communications officer is established it is imperative that we continue their education as technologies change, as well as to re-enforce quality habits and performance.</p>	
<p>Benjamin Duncan, Director Mecklenburg County ECC</p>	<p>Compulsory Minimum Training Standards for Dispatchers I also echo the PSAP communities call for changes to the current standards. I have been involved in the Criminal Justice System and Emergency Services community for many years. I recently started my new position and when I realized that telecommunicators were only mandated to have one (1) week of basic and become certified in VCIN, that immediately got my attention and concerned me deeply . Throughout my career continuing education and training hasn't been something that was optional, it was mandatory, as it should be for our TC's. The job of TC is a multi faceted, constantly evolving position, which requires proficiency and expertise at many different disciplines. We encourage the DCJS to review APCO's minimum training standards for our TC"s as we support their initiative. We respectfully request that</p>	

	<p>DCJS implement and fund additional basic training hours, provide specialized training opportunities and mandate continuing education training for our TC's. We feel that changes to our current standards are critical and crucial to our future success. Thank you for the opportunity to share!</p>	
<p>Renee B. Meador - Central Virginia Criminal Justice Academy, Lynchburg VA</p>	<p>DCJS Rules Relating to Compulsory Minimum Training Standards for Dispatchers As with any other field of expertise, the entry level certification(s)/ training for Dispatchers (Emergency Communications Officers) need to be updated and standardized as is done with all of the standing criminal justice entities under VA DCJS. To ensure that the anticipated updated competencies are met, AND that the quality and consistency of training meets and validates DCJS expectations, there are 3 levels of training that need to be updated.</p> <ol style="list-style-type: none"> 1. The entry level requirements should be expanded to 80 hours, not to include VCIN/NCIC certification or EMD certification. With the elevated performance expectations, including Net Gen, the minimum of 40 hours is not sufficient. Considering that the final 8 hours is generally the testing process for practical applications that means the current classroom instruction is merely 32 hours, which includes written testing. This is not sufficient for today's Dispatcher to learn today's core competencies. 2. Practical testing. The scenarios need to be upgraded to be a more effective, relevant, and realistic . The Pass / Fail system needs to be articulate, specific, and relevant. 3. On-the-job (OJT) training should remain a required element as the responsibility of each agency. <p>Additionally, as with all other criminal justice entities, anytime time that you CERTIFY personnel, there should be a mandated number of hours of in-service training hours to recertify. Recertification would ensure that Dispatchers are being held to the same training and certification mandates as all other criminal justice entities in VA. At a minimum, the recertification / in-service training hours mandated should be no less than 16 hours of relevant coursework every 2 years. Having spent 7 years on Academy staff and still teaching regularly at three of the Virginia regional academies, although I understand that agencies would benefit financially by allowing the entry-level training and required in-service training to be conducted at each agency, the overall climate for entry-level certification that are already in place by DCJS ensure that there are never any "short-cuts" taken, and that the testing process is not compromised. The testing process, as it relates to liability AND skill-sets, needs to be in a controlled environment and standardized state-wide. With the electronic grading system in place at each academy, that makes the testing process objective, not subjective through each agency, and records are kept in one central, secure place. With all of our regional academies [academies] being short-staffed, expecting those personnel to individually validate every student specifically through each agency's own program and subsequent testing, is an unrealsttic [unrealistic] expectation. Additionally, although I understand that VA DCJS is department of CRIMINAL JUSTICE services, there should be provisions for Fire and EMS basic training that would allow the testing process to remain under the control of DCJS. Once individual agencies are allowed to remove testing to off-site locations such as within an agency itself, then DCJS no longer has control of the quality of the testing, both written and practical exercises, and cannot maintain the electronic grading system which keeps all training and testing records in one system. Using a national standard for training, as has been indicated by numerous other contributors to these comments, is an excellent way</p>	

	<p>to ensure that training is truly standardized. The recommendation to use ANSI-approved APCO training standards as a basic entry level certification in place of the current DCJS standards is a sound and practical recommendation. However, all testing should remain under DCJS control and be consistent with every agency.</p> <p>Emergency Communications Officers training has been on the back burner as far as upgrading quality, for a number of years. Skill-sets have changed along with technology, which makes the need to revamp this entire entry level program crucial, as well as adding a requirement for in-service hours every 2 years as a recertification process.</p>	
<p>Renee B Meador - Adjunct Instructor/ Central Virginia Criminal Justice Acad</p>	<p>amend organization affiliation to reflect "Adjunct Instructor" at CVCJA Language oversight - amend organization affiliation to reflect "Adjunct Instructor" at CVCJA</p>	
<p>Tamera Higgins, Chesterfield Emergency Communications *</p>	<p>Rules Relating to Compulsory Minimum Training Standards for Dispatchers [6 VAC 20 ? 60]</p> <p>In reviewing the request for changes to the compulsory minimum training standards requirement for entry level dispatchers, there are several things to consider. The size and complexity of each agency is specific to their needs, dispatch function and community expectation. With that consideration, 40 hours of Basic training should just be the doorway and introduction to the career with a mandated follow through on On-The-Job training hours. To further define the standards and require documented on the job training (aside from the initial and date strategy of the current worksheet) would provide a newly hired dispatcher the guidance needed to handle calls for service from their community. In reality basic training is just that and needs to be considered as such. In these classes you will encounter agencies who do not handle all public safety entities so you must craft the basics to suit all students in attendance. As a training school it is a quick turnaround time; however, our students leave having a better understanding of the call taking, radio dispatch, CISM, HIPAA and liability issues, to name a few, facing dispatchers in today's environment. Technology will differ from agency to agency; however, a basic understanding of the progress and use of technology in this profession is key.</p> <p>In addition to these considerations, we must recognize the limitations of small and large size entities to provide this amount of training. Often removing a dispatcher from the operational environment is taxing enough on a department; however, removing them for a two week period or 80 hours further taxes them. In most cases there is a cost for attendance and the agency providing instruction incurs costs. When an agency is not an academy setting (example Crater Academy that serves no community PSAP service) will have logistical costs for instructors, meeting space, overtime pay for coverage on the operational floor etc.</p> <p>On the topic of required re-certification training – I highly encourage the consideration of a mandatory number of training hours per year with specific categories/topics identified by DCJS. In addition to the required training, there should be a requirement to provide proof of such training being received/attended. This ensures dispatchers are receiving training that is accepted on a statewide level as opposed to only adapting to their independent environments.</p>	

Rules Relating to Compulsory Minimum Training Standards for Dispatchers identifies the categories of training for compulsory minimum training standards for dispatchers along with the information regarding training schools and the timeline for completing training, grading, and record keeping requirements.

Dispatchers are often the first responders to emergency situations. Dispatchers must quickly assess the information provided by an individual contacting 911 and dispatch the appropriate resources while calming victims, gathering additional details to relay to law enforcement, or in some localities by providing life saving instructions for CPR or the Heimlich Maneuver. This regulation protects the health welfare and safety of citizens by ensuring dispatchers that are employed by or in a local or state government agency whose duties include dispatching of law-enforcement personnel receive adequate training.

The majority of the public comments fell into the following categories.

1. Dispatchers that handle fire and EMS calls should be regulated by DCJS and be required to meet the minimum training requirements of dispatchers handling law-enforcement calls.
2. DCJS should require the instruction time for the basic dispatcher academy course be greater than forty hours.
3. DCJS should require dispatchers complete continuing education hours or in-service coursework in addition to the basic dispatcher academy.
4. DCJS should incorporate or use the training standards and course work that has been developed by the Association of Public Safety Communications Officials.

This regulation continues to be necessary. The regulation is not complex and the proposed revisions will assist in making it clearly written and easily understandable. The regulation does not overlap, duplicate, or conflict with federal or state law or regulation. This regulation underwent a review in 2011. The proposed revisions made in 2011 became effective on March 14, 2012.