Appendix E3: T911 Recommendations Feedback Synthesis

To: Transform911 Workgroup Co-chairs

From: University of Chicago Health Lab, Transform911

Subject: Summary: Synthesis of feedback on the Transform911 Recommendations

Date: May 2, 2022

This memo presents a synthesis of the feedback received on the Transform911 draft recommendations. The draft recommendations were presented publicly for the first time at the Transform911 second convening, held March 2 — 4, 2022. Feedback was gathered from the public via online portal, as well as from reactors identified by the Transform911 team, from March 2 through May 1, 2022. This synthesis consists of feedback from both sources. Where possible, the source of the feedback is identified. Emergent themes for each of the workgroups is included, along with global themes that emerged across the workgroups.

Attached to this memo, we have included summary statistics and visuals presenting public agreement on all recommendations as captured through the online feedback submission forms.

While there is value in considering all the feedback received, not all the feedback included is necessarily an indication of the truth. These are simply people’s thoughts and impressions. Likewise, while all feedback has and will be considered, not all feedback has or should be addressed. In many instances, feedback cut in multiple directions and/or was conflicting.

We are very much looking forward to next steps.

Overall Feedback/Themes

Overall, there was lots of appreciation for calling attention to the needs of 911 professionals and the industry as a whole. There were very many instances of comments like, “it’s about time!” or “this is long overdue!” This is indicative of the fact that those working in the industry have long felt overburdened and overlooked. Everyone involved should take pride in the fact that we are shining a light and bringing crucial attention to these issues. Below are the global themes that emerged across all workgroup feedback:

- Funding is critical. Emergency communication centers are already struggling with funding current operations and necessary upgrades. Many of the recommendations will require even further funding, so it’s important that we recognize where additional resources are necessary. This theme emerged most strongly for:
  - Establishing emergency communications centers as lateral, independent organizations
  - Collection of 911-related data
  - Implementing advanced technology and NextGen911
  - Language translation services
- The concept of “accountability” was somewhat concerning for respondents, who largely expressed that they were more comfortable with the establishment of standards than
accountability to outsiders. This feedback took two main forms:

- To whom are we beholden?
  - While respondents felt that the community should have input, they expressed discomfort with the community having decision-making power.
  - Instead, they felt that the industry needs domain experts to make decisions; the community can be uninformed and unrealistic in their assumptions about how 911 does/should function.

- Federal authority and oversight made respondents uncomfortable. They largely did not support federal standards or oversight (or any federal involvement for that matter)
  - Many thought state standards would be more feasible and acceptable.

- Circling of wagons: Overall, some level of defensiveness remains and is suffused throughout the comments. Examples of this type of sentiment include:
  - A lot of “what does this even mean”-type comments
  - “We’re already doing this” (e.g., collecting data, promoting sustainable outcomes, and performing gap analysis/CFS analysis)

- Define, define, define: many comments were related to a need to better define concepts or terminology. This came in two separate but related refrains:
  - We(ReLU) need to define:
    - Who is the community (alternative first responders)
    - Sustainable positive outcomes:
      - Sounds like establishing a pre-defined outcome
      - Is too broad to focus on during emergent responses
    - Community-led
    - Achieving equity
    - Accountability
  - Who gets to define (e.g., what is ethical; uniform data standards)?

- Language: some of the chosen language may be inaccessible or triggering for certain audiences. Notable examples were:
  - “Centering on”
  - “Sustainable positive outcomes”
  - “Inclusive hiring practices”

- Scope of 911: there is still very much a disconnect between what 911 professionals do and anything that comes afterward. Some examples of this include:
  - You can’t talk about alternative responses in the same breath as 911 because “we” don’t do that.
  - These recommendations are really about transforming the whole system, not “911” proper.
  - Related theme: 911 is about responding to an event (e.g., in the now), so recommendations pertaining to cultural competence or trauma-informed are outside of the scope and/or will cause delays.

- Evidence: point to evidence for the recommendations and acknowledge where it doesn’t exist.
- There is some sense that the recommendations focus too much on the community and not enough on 911 professionals. For example:
  - “Positive outcomes” seems to be defined as community-facing and not taking into account 911 professionals (and responders).

- Data privacy/confidentiality concerns
In particular, some respondents called for more attention to the issues surrounding sharing data (particularly sensitive Protected Health Information (PHI) or criminal justice data) with outside groups (such as civilian responders).

- Phased recommendations: some respondents urged us to consider phasing recommendations, such as by identifying short-term vs. long term strategies.

**Alternative First Responders**

Overall, many respondents supported the idea of establishing alternative responders. There was support for expanded continuing education and standards, as well as some community involvement, but less so for accountability to the community and/or federal government.

- Defensiveness: "Accountability" is provoking and infers you are looking for something wrong. Watch out that reporting requirements don't create an undue burden.
  - More training, continuing education, and standards for 911 professionals, but not necessarily accountability (esp. to the community)
- Purpose of 911 is to respond to an event in the NOW, not to address things like cultural competence
  - 911 professionals don't have enough time for this/some of these are outside the scope of 911
  - 911 meant to address the call, not treat the caller
- Define, define, define
  - Who is the "community?" Community doesn't have a singular voice; who gets to decide? Who's values win when there is a conflict?
    - Community should have a say within reason. When community voices an opinion that the system thinks won't work, how is the outcome decided?
    - How to manage community's unrealistic expectations of what 911 is/does? How to make sure that they are informed before they bring their unrealistic assumptions to bear
    - You need skilled professionals making decisions, not the community
  - Sustainable positive outcomes
    - Need positive outcomes for responders too
- Community-led
- Accountability
- Include focus on second response

**911 Professional Careers and Supports**

Overall, there was strong support for recognizing 911 professionals as first responders, in recognizing their importance, and in investing in the 911 workforce.

- Strong support was expressed for recognizing 911 professionals as first responders
  - This is one of the few sentiments expressed without caveats
  - We may want to mention/recognize the CARES Act
- Strong support was expressed for increased investments in 911 professionals
  - Recognize that increased staffing overall is critical
Recognize that career development and continuing education is incommensurate with things like mandatory overtime

Offer additional recommendations, like trauma peer support and retirement and other benefits that are commensurate with other first responders

- Some respondents were concerned with the concept of “inclusive hiring practices”
  - This seemed to be triggering for some generally
  - Some suggested that we need to specify that 911 is a skills-based profession above all else and that “inclusive” hiring can’t take the place of hiring for skill/hiring the most qualified candidates

- There was mostly strong support for reintroducing 911 professionals to the public
  - Many felt that this would help with recruitment efforts
  - Some expressed that they feel that the public already acknowledges the importance of 911 professionals

- In general, clearly state that many of the issues experienced by 911 professionals stem from chronic understaffing and mandatory overtime.

**911 Technology and Infrastructure**

Overall, respondents supported the establishment of data ethics statements and uniform data standards, as well as the implementation of more modern tools and technology. Some expressed worry about who would define things like ethical use of data and data standards. Similarly, some worried that blanket requirements of NextGen 911 and i3 are overbroad.

- Technology improvements: overall there was strong support for tech improvements, such as better data, video, text-to-911, and enhanced location, but related concerns about:
  - The need for additional resources.
  - Blanket requirements for NextGen 911 may be unrealistic given the variability in ECCs, urban vs. rural settings.
- Some concerns were expressed over who gets to define (guidelines vs. standards; state vs. localities vs. community) things like:
  - "Ethical" (as in data ethics statements)
  - "Uniform data standards"
- Some concerns were expressed over the sharing/storing of data:
  - Collaborations with outside partners (e.g., social workers) creates some data sharing challenges, especially with protected health information (PHI)
  - Safe and secure storage of personal information should be considered for recommendations
- Interoperability and procurement: IJIS and APCO have already done extensive analysis and have recommendations
  - Procurement is a very localized/state-driven thing. Hard to imagine a playbook could be applied
- Cite evidence:
  - Define what you mean by “grounded in evidence”
  - Cite available evidence for your recommendations
- It may be helpful to identify short-term vs. longer term strategies
ECC Operations

Overall, there was strong support for establishing emergency communications centers as independent, lateral organizations, even as there was doubt that current local stakeholders (e.g., police chiefs) would support it. There is also strong support for increased funding and resources.

- ECCs as independent, lateral organizations:
  - It will be hard to convince local jurisdictions and police chiefs, who currently have control, to support this. And expensive to do.
  - Even independent ECCs have boards that are mostly police and fire (some states require representation).
  - May need to distinguish between call taking and dispatching: some locations require dispatch from within department (e.g., police dispatch police).

- Governing authorities: composition of these bodies is important. They are likely to be filled with local elites, installed by local politicians and thus may not actually be representative.

- State level vs. federal level standards: most respondents suggested that state standards would be preferable to federal ones.
  - Many suggested that establishing federal standards goes against the local nature of 911 services.

- Technology:
  - i3 is not the same as text-to-911 and enhanced location. i3 requires lots of new and untested technology, so blanket requirement to comply with i3 isn't realistic.
    - Consider that this may be cost-prohibitive for smaller ECCs
  - Be careful about the broadness of alternative responder interoperability.
    - Do we mean to require that alternative responders have access to PHI and privileged legal records? If so, recognize that these may be protected at a level that will not permit sharing with those outside the organization/civilians.

- More funding is needed for many of the recommendations, including ECC independence, enhanced technology, and language translation services.

911 Governance

Overall, respondents supported coordination among emergency communications centers, but this largely did not include consolidation. Similarly, respondents supported some community involvement, but not decision-making power (which many felt should remain with those having domain knowledge). Many supported standards, preferably at the state level; and some pointed to existing standards set by the Federal Communications Commission (FCC) and NENA/APCO.

- Consolidation is a complex topic.
  - It will be difficult to implement in states with home rule
  - Consolidation can dampen local voices; homogenize in unhelpful ways
    - Diversity among ECCs may exist for a local reason
    - Can lead to large conglomerates making the decisions instead of locals; reduction of local experience and knowledge
It may lead to lost jobs for 911 professionals

- Recommendation comes across as out of touch with the preferences of the 911 community
- Consider “coordination” instead of consolidation

- Community voices as "input," not power over (lots of uninformed voices in the community)
- Lack of support for federal standards/cabinet-level position
  - There is already too much red tape involved in the 911 system
  - Folks at federal level know nothing about 911/FCC already does this
  - 911 operations have always been set locally because there are so many local factors involved.

### 911 Hotline Alternatives

Overall, most respondents supported the establishment of alternative hotlines, though support was not universal. Some worried about requiring the public to remember/distinguish between additional numbers; others felt that these alternatives should be operated by the 911 system because it already has the logistical know-how. Many brought up the need for funding—for both existing systems and new hotlines.

- Most respondents supported the establishment of alternative hotlines. Some caveats were also expressed:
  - Worry that people will be required to remember yet another number (and may simply call 911 as a result)
    - Expressed support for public education/marketing these alternatives
  - There is a need for transparency about things like whether police will be sent (e.g., requirements for certain call codes where involving police may be mandated)
  - “Free” hotlines require funding support
  - Some support for these being operated within existing 911 infrastructure (though some felt the opposite way: that ECCs are already overburdened and so could not be responsible for operating these additional hotlines)

- People took issue with the word "center" as in center on the community...
  - Assumed that those that are harmed are "outliers?" [even if they are, shouldn't the failures – even when limited in number – inform us?]

- Funding: Don't divert funding from the 911 system!
  - Many comments in this section were about funding. These took two major forms:
    - 911 is already in place; hotlines unnecessarily divert resources
    - Hotlines should be run through ECCs
Public Feedback on Draft Recommendations

Total feedback form submissions on Transform911.org, 3/2/22 – 5/1/22

Day 1 (Alternative First Responders and 911 Pro): 77

Day 2 (Technology and ECC Operations): 58

Day 3 (Governance and Hotline Alternatives): 70

Total: 205
1. Emphasize trauma-informed, culturally-sensitive, person-centered response.

- Need info: 19 (27%)
- No: 7 (10%)
- Yes: 41 (58%)
- Yes, with changes: 4 (5%)

2. Collect data to understand needs, iterate on progress, and support accountability.

- Need info: 14 (19%)
- No: 4 (6%)
- Yes: 46 (64%)
- Yes, with changes: 8 (11%)

3. Build toward sustainable positive outcomes for everyone involved in the system.

- No: 12 (17%)
- Need info: 12 (17%)
- Yes: 51 (72%)
- Yes, with changes: 4 (5%)

4. Create community-led accountability to support desired impact.

- No: 18 (25%)
- Need info: 18 (25%)
- Yes: 38 (53%)
- Yes, with changes: 4 (5%)
1. Ensure recognition of 911 professionals as public safety professionals.

- Yes: 69 (94%)
- Yes, with changes: 2 (3%)
- Need info: 2 (3%)

2. Reintroduce 911 and 911 professionals to the American public.

- No: 1 (1%)
- Need info: 14 (20%)
- Yes: 56 (79%)

3. Invest in workforce development and inclusive hiring processes.

- No: 2 (3%)
- Need info: 9 (14%)
- Yes: 54 (83%)

4. Take active measures to foster the career development and workplace retention of fully successful 911 professionals.

- Need info: 7 (9%)
- Yes, with changes: 2 (3%)
- Yes: 64 (88%)
1. Adopt NextGen911 to create more equitable and effective emergency response outcomes.

2. Develop a data ethics statement to ensure appropriate and ethical use of personal information in emergency service decision-making.

3. Define and implement uniform data standards for call data to enable government transparency, achieve equity, and improve emergency response outcomes.

4. Empower and incentivize ECCs with modern tools by using dedicated shared services models and cloud-based services to improve consistency and quality of service.
5. Develop an emergency procurement playbook: a living document that helps emergency services professionals navigate the complexities of funding, technology, and operations.

6. Require vendors to provide real-time access to call data for reporting and analytics to support continuous improvement.
1. Ensure ECCs are independent agencies and not subordinate to peer agencies (fire, police, and EMS).

- Yes: 36 (69%)
- No: 6 (12%)
- Need info: 8 (15%)
- Yes, with changes: 2 (4%)

2. Ensure governing authorities and boards that control emergency communications centers are representative of the community they serve.

- Yes: 33 (69%)
- No: 6 (12%)
- Need info: 9 (19%)

3. Require ECCs to offer all advanced services, including text-to-911 and enhanced location data, required by the i3 standards – particularly for people with disabilities and people whose first language is not English.

- Yes: 36 (75%)
- No: 7 (15%)
- Need info: 5 (10%)

4. Formally recognize emergency communication professionals as public safety responders at the local, state, and federal levels.

- Yes: 50 (96%)
- No: 1 (2%)
- Need info: 1 (2%)
- Yes, with changes: 1 (2%)
5. Ensure state statutes require communication interoperability among fire, police, EMS, and alternative responders.

- Yes: 36 (70%)
- No: 6 (12%)
- Need info: 7 (14%)
- Yes, with changes: 2 (4%)

6. Develop a credentialing process for technology vendors to apply and demonstrate compliance with all American National Standards Institute standards.

- Yes: 37 (71%)
- Yes, with changes: 2 (4%)
- No: 5 (10%)
- Need info: 8 (15%)

7.Legislate a national minimum training standard for emergency communication professionals.

- Yes: 35 (68%)
- Yes, with changes: 1 (2%)
- No: 9 (18%)
- Need info: 6 (12%)
1. Establish a high-level federal position and cabinet-level working group to create and implement national standards for 911.

- Need info: 11 (17%)
- No: 15 (23%)
- Yes: 33 (52%)
- Yes, with changes: 5 (8%)

2. Invest 911 professionals and community members with power in governance decisions.

- Need info: 19 (30%)
- No: 5 (8%)
- Yes: 32 (51%)
- Yes, with changes: 7 (11%)

3. Establish national and state level standards for how ECCs operate.

- Need info: 13 (20%)
- No: 8 (12%)
- Yes: 38 (59%)
- Yes, with changes: 6 (9%)

4. Increase coordination among ECCs and consolidate where possible.

- Need info: 9 (14%)
- No: 9 (14%)
- Yes: 39 (61%)
- Yes, with changes: 7 (11%)
1. Center the voices of those who have experienced unintentional harm or trauma by the emergency response system.

2. Foster a robust, well-marketed, and transparent ecosystem of alternative hotline options, including those both directly connected or not to centralized emergency response centers.

3. Identify 911 emergency calls-for-service that could be safely transferred to alternative hotlines through community engagement, services gap analysis and law enforcement data analysis.

4. Develop alternative hotlines that can provide immediate access to, and robust knowledge of, available resources that offer personalized supports.
5. Ensure viable alternative hotlines are cost-free, widely accessible, technology driven, and able to support high call volumes 24/7.