



January 2010

Report No. 10-12

911 Call Center Training in Florida Varies; Options Exist for Creating Minimum Standards

at a glance

Effective call-taking and dispatching are critical to the success of the 911 system. Call center staff must calmly and accurately gather information from distressed callers and determine which agencies should be sent to assist each caller.

Florida does not regularly collect comprehensive information on all call center staff. While the state offers a 208-hour voluntary training certification program for 911 call center staff, it does not mandate minimum levels of training for these personnel as do other large states. As a result, the initial and in-service training provided to 911 call center staff varies across the state. Most call centers reported that they offer some level of either formal classroom training and/or on-the-job training for newly hired 911 call-takers and dispatchers. However, training is largely accomplished on the job and formal training generally falls short of voluntary certification standards. While E911 funds can be used for call-taker training, they cannot be used for dispatcher training, which is primarily funded through local sources.

The Legislature could consider several options for mandating training and certification and making training more accessible to call centers. Alternatively, the Legislature could consider requiring minimum levels of training without mandating certification.

Scope

As directed by the Legislature, OPPAGA reviewed current training provisions for Florida's 911 emergency dispatcher personnel. Our review addressed five questions.

- How many call centers operate in Florida and how many 911 call center staff do they employ?
- How do Florida's statutory provisions for 911 call center staff training compare to those of other states?
- How much training do Florida's 911 call center staff currently receive?
- How are 911 call center staff training activities funded?
- Is there a compelling state interest in requiring mandatory training for 911 call center staff?

Background

Since 1973, Florida's state and local governments have been building and updating technology to support a 911 system that serves its citizens and visitors in emergency situations. In May 1997, the system achieved statewide implementation. The system was upgraded to Enhanced 911 (E911) services, which identifies callers' telephone numbers and addresses to local

dispatchers, for wireline and landline calls in September 2005. In March 2008, the system was upgraded to E911 services for wireless calls. E911 service is currently available in all 67 counties.

Florida currently has 235 public safety answering points, also known as call centers, that receive emergency 911 calls. Staff in these call centers include call-takers, dispatchers, and dual call-taker/dispatchers. Call-takers answer calls and record necessary information such as the caller's name and the nature of the emergency, and relay this information to dispatchers who assess the information, determine the type of emergency response needed, and direct appropriate emergency services (e.g., police, fire, or ambulance) to respond to the call. In some call centers, call-taking and dispatch functions are performed by the same individual (dual call-taker/dispatcher).

State, county, and local government entities administer Florida's E911 system.

The Department of Management Services coordinates the statewide system but has no authority to monitor emergency services. The department provides technical assistance to counties on technology standards and operational capabilities, helps design and implement new communications and data systems, and assists with staff training. The department also develops and updates a statewide emergency communications E911 system plan, which provides guidance to counties but permits them to design and maintain their own 911 systems and plans.¹ The department's statewide 911 coordinator reviews county plans and inspects call centers for compliance with the state plan.

The E911 Board was established by the Legislature in 2007 to administer the Emergency Communications Number E911 System Fund (E911 Trust Fund), which is

the main funding source for 911 communications in the state.² The board consists of nine members, including the Department of Management Services' E911 system director, who is designated by the Secretary of the Department of Management Services and serves as chair.³ With oversight by the department, the board administers the fund and disburses revenues to the department, wireless providers, and counties for specific authorized expenses.

Boards of County Commissioners are the responsible fiscal agent and ultimate authority for 911 services in each county. Each board designates a county 911 coordinator who serves as a point of contact for local call centers, reports on system status, and submits the county 911 plan to the department. These plans describe county 911 system infrastructure and staffing for each call center. Call centers are typically operated by city police departments and county sheriffs' offices. Call centers may establish their own training protocols and quality assurance measures.

Questions and Answers

Effective call-taking and dispatching are critical to the success of 911. Call center staff must calmly and accurately gather information from distressed callers and determine which agencies should be sent to assist each caller. Errors in 911 call-taking

² The E911 Trust Fund is derived from a monthly fee (not to exceed 50 cents) on each wireless and non-wireless voice communication subscriber with a Florida billing address. The E911 Board makes disbursements from the E911 Trust Fund for wireless service provider E911 deployment and services, county E911 funding for equipment and services, rural county grants, E911 state grants, and E911 Board administration and operations.

³ Pursuant to Section 365.172(5)(b), *F.S.*, the Governor appoints the remaining eight members: four county coordinators from a large, medium, and rural county and an at-large representative recommended by the Florida Association of Counties, two local exchange carrier members, and two members from the wireless telecommunications industry.

¹ Section 365.171(4), *F.S.*

and dispatching can lead to tragedy, as occurred in a 2008 case.⁴ Call center staff should receive adequate training to ensure that they can effectively perform their functions.

While Florida has a 208-hour voluntary training certification program for 911 call center staff, the state does not mandate minimum levels of training for these personnel. Most responding call centers offer fewer than 208 hours of formal training to their call center staff, and this training is largely more on-the-job training than formal. To fund their training efforts, call centers use a mixture of E911 funds and local funding sources. Given public safety concerns, the state has an interest in mandating training for 911 call center personnel.

How many call centers operate in Florida and how many 911 call center staff do they employ?

The state does not regularly collect comprehensive information on all call center staff. It has been estimated that the centers employ approximately 6,000 staff, and the 140 call centers that responded to our survey reported having 4,999 call center staff.

County 911 plans are required to include information on the number of call-takers and dispatchers in each call center, and bill analyses for proposed legislation have used this information to estimate that the centers have 6,033 call center staff statewide. However, we determined that staffing data in the county plans was at times outdated and inaccurate.⁵ The E911 Board collects

staff information annually, but only requests information on the number of call-takers in each county.

To obtain more reliable staffing data, we surveyed the 911 county coordinators, who reported the number of call centers within their counties and distributed questionnaires to each call center supervisor. We received responses from each county coordinator and 140 of the 235 call centers they identified.⁶

As shown in Exhibit 1, survey respondents indicated that their call centers employ 4,999 call center staff. More than half of these staff had dual call-taking and dispatch responsibilities. However, as we did not receive responses from 95 identified call centers, we could not identify the total number of 911 call center staff statewide.

Exhibit 1 911 Call Centers That Responded to Our Survey Reported Having 4,999 Call Center Staff

Type of Staff	Number	Percentage ¹
Call-taker	831	17%
Dispatcher	697	14%
Dual call-taker/ dispatcher	2,841	57%
Supervisor	630	13%
Total	4,999	100%

¹ Percentages do not total to 100% due to rounding.

Source: OPPAGA survey of 911 call centers.

⁴ In January 2008, Denise Amber Lee of North Port, Florida, was abducted from her home and murdered after calling 911 to report her own abduction. A breakdown in emergency response efforts, including dispatch errors, affected law enforcement efforts to quickly respond to her abduction.

⁵ For example, one county's 911 plan that lists 15 active call centers was last updated in 2002. In response to our survey, the county coordinator reported three active call

centers. Due to such discrepancies, county plans are not reliable sources of information on call center staffing and organization.

⁶ We received survey responses from 138 of the 228 local call centers and two of the seven Florida Highway Patrol call centers, for an overall response rate of 60%. In 10 counties (Calhoun, Clay, Flagler, Franklin, Gadsden, Hamilton, Okeechobee, Osceola, Santa Rosa, and Suwannee counties), no call center responded to the survey.

How do Florida's statutory provisions for 911 call center staff training compare to those of other states?

While Florida has a voluntary certification program for 911 call center staff, state law does not mandate minimum levels of training. Unlike Florida, many states require all 911 call center staff to receive approved training.

Chapter 2008-51, *Laws of Florida*, established a voluntary certification program for 911 call center staff, which requires 208 hours of training.⁷ This program enables call center staff to become certified in two ways. First, staff may receive certification if they document having at least five years of supervised full-time employment as a 911 call-taker or dispatcher since January 1, 2002. Second, staff can become certified by documenting that they have at least two years of supervised full-time employment as a 911 call-taker or dispatcher since January 1, 2002, and that they have completed a training program that uses a curriculum framework approved by the Florida Department of Education.⁸

The 911 staff members may complete the training program in two ways. First, staff may complete coursework provided by a Florida college or school. Second, staff may complete a training program delivered by a local law enforcement agency that has been approved by the Department of Health and meets the Department of Education's curriculum framework. As of December 2009, only two Florida colleges—Brevard Community College and Tallahassee Community College—offer an approved training program. In addition, two local government agencies—Palm Beach County

Sheriff's Office and Palm Beach County Fire Rescue—have received the Department of Health's approval to use their local training program for certification.⁹

People who wish to be certified or recertified as 911 call-takers or dispatchers must apply to the Florida Department of Health and pay a \$75 application fee. Certification is valid for two years unless revoked or suspended by the Department of Health. Certified persons must pay a \$100 renewal fee thereafter. The Florida Department of Health reports that 1,112 individuals had received this certification as of January 2010. This included 1,109 individuals who received certification by documenting five years of supervised full-time employment and three individuals who received certification by documenting two years of supervised full-time employment and completing an approved training program.

Unlike Florida, many states require all 911 call center staff to receive approved training. A 2007 study by the Florida chapter of the Association of Public-Safety Communications Officials reported that 27 states had mandatory training standards for 911 call center staff, while 5 states had voluntary training standards and 18 states had no training mandates.¹⁰ Required and voluntary training programs ranged in length from 40 to 640 hours.

Other large states, including California, Illinois, New York, and Pennsylvania, mandate training for 911 call center staff. For example, New York requires all 911 call center staff to complete a 200-hour

⁷ Section 401.465, *F.S.*

⁸ The Department of Education curriculum provides two levels of training: a 208-hour program for police, fire, and ambulance dispatchers and a 24-hour program designed for emergency medical dispatchers.

⁹ Local agency call centers that are not under the jurisdiction of the Department of Education (such as law enforcement agencies) may submit their training curricula to the Department of Health for approval. They must identify instructional objectives that meet the Department of Education's public safety telecommunication curriculum framework.

¹⁰ This study included Florida as 1 of the 18 states that did not have a training mandate. It was conducted prior to Florida implementing its voluntary certification program in 2008.

emergency services training and evaluation program. In addition, these staff must complete a minimum of 40-hour classroom instruction that covers topics such as telephone techniques, call classification, and stress management. Pennsylvania requires 911 call-takers to complete a minimum of 104 hours of classroom and hands-on instruction, a written examination, and a practical test of call-taker skills. Pennsylvania also requires 911 dispatchers who work for fire, ambulance, or emergency medical service, or emergency management agencies to complete a training course that includes a minimum of 120 hours of classroom and hands-on instruction, while those working for law enforcement agencies must complete a minimum of 136 hours of classroom and hands-on instruction.¹¹

National organizations have recommended training requirements for emergency call center staff, but these recommendations differ. For example, the Association of Public-Safety Communications Officials recommends 54 hours of instruction for public safety call-takers and dispatchers while the National Emergency Communications Institute offers a 40-hour training course for 911 officers that meets training standards for several associations.¹²

How much training do Florida's 911 call center staff currently receive?

The initial and in-service training provided to 911 call center staff varies across the state. Most (129, or 92%) of the 140 call centers that responded to our survey report that they offer some level of either formal

classroom training and/or on-the-job training for newly hired 911 call-takers and dispatchers. However, this training is generally done on the job and formal training generally falls short of the voluntary certification standards established by Ch. 2008-51, *Laws of Florida*.

As shown in Exhibit 2, most of the initial employee training offered by call centers is on-the-job training rather than formal classroom training.¹³ For example, for staff who perform both call-taking and dispatching, call centers report they provide an average of 3 weeks of formal, classroom training compared to 14 weeks of on-the-job training.

Exhibit 2 Florida's Call Centers Provide More On-the-job Training Than Formal Classroom Training

Type of Call Center Staff	Average Formal Training	Average On-The-Job Training
Call-taker	135 hours	413 hours
Dispatcher	104 hours	488 hours
Dual call-taker/dispatcher	111 hours	555 hours

Source: OPPAGA survey of call centers.

Most call centers provide fewer formal classroom training hours than the 208 hours required by the voluntary certification program (see Exhibit 3).

¹¹ While counties are responsible for implementation and maintenance of the 911 system in Pennsylvania, this training and certification is an authorized expenditure of 911 fees.

¹² The National Emergency Communications Institute course meets Project 33 national public safety 911 training standards, the National Emergency Number Association call handling and call answering standards, National Fire Protection Association standards for telecommunicators, and the Commission on Accreditation for Law Enforcement Agencies standards for public safety communications agencies.

¹³ Of the 129 call centers that responded to a specific question on their training requirements, 47 reported that they require some kind of initial training for their call-takers, 30 for their dispatchers, and 116 for their dual call-taker/dispatchers. Of those call centers that reported a specific number of hours in their training schedules, Exhibit 2 shows the average number of training hours provided to each type of telecommunicator staff.

Exhibit 3 Florida's Call Centers Generally Offer Less Than 208 Hours of Formal Classroom Training to Staff

Type of Call Center Staff	Less Than 208 Hours	208 Hours or More
Call-taker (n=35)	28 (80%)	7 (20%)
Dispatcher (n= 16)	14 (87%)	2 (13%)
Dual call-taker/dispatcher (n=84)	73 (87%)	11 (13%)

Source: OPPAGA survey of call centers.

Most Florida call centers do not offer in-service or continuing education training, and those that do offer this training often provide fewer hours than that required by some other states and recommended by a national organization. The Association of Public-Safety Communications Officials recommends that agencies require at least 24 hours of continuing education or recurrent training for telecommunication staff annually.¹⁴ As shown in Exhibit 4, less than half of the centers reported providing annual in-service training to their call-takers, and about a third offered annual training to call center staff.

Exhibit 4 Florida's Call Center Staff Typically Do Not Receive In-Service Training

Type of Call Center Staff	Percentage Offering In-service Training	Average Hours of In-service Training
Call-taker (n=66)	42%	23 (n=27)
Dispatcher (n=55)	35%	14 (n=14)
Dual call-taker/dispatcher (n=132)	59%	26 (n=66)

Source: OPPAGA survey of call centers.

The average number of in-service training hours provided annually in Florida differs by occupation type. For example, the 66 call centers that reported a specific number of in-service training hours for dual call-taker/dispatcher personnel offer an average of 26 hours, ranging from 1 hour to 216 hours per year.

Other states require annual in-service training for 911 staff. For example, California requires 24 hours of training every two years while New York requires 21 hours of training every year. Illinois requires continuing education for call center staff, but does not specify a number of required in-service training hours.

How are 911 emergency call center staff training activities funded?

Funding for call-taker training comes from E911 funds and dispatcher training is paid primarily through local funding sources.

Call centers use a mixture of E911 and county funds to train call center staff. As shown in Exhibit 5, of the call centers that require initial training (129), the most common source of funding for training was E911 funds, followed by county and municipal funds.¹⁵ Call centers also reported using other sources, such as Florida Second Dollar funding.¹⁶

¹⁴ The Association of Public-Safety Communications Officials, *Minimum Training Standards for Public Safety Telecommunicator, Draft for Public Review and Comment*, September 2009.

¹⁵ Of the 106 unique call centers reported a funding source for their training budget, 36 indicated a funding source for call-taker training, 17 for dispatcher training, and 98 for staff who perform both functions.

¹⁶ According to s. 938.15, *F.S.*, 'second dollar' is the term used for the portion of funds allocated to police agencies by the state from traffic and court fines imposed on individuals.

Exhibit 5 Most Training Is Funded by E911 Funds¹

Funding Source	Call-takers (n=36)	Dispatchers (n=17)	Dual (n=98)
E911 Funds	20	3	45
County Funds	9	4	38
Municipal Funds	7	1	32
Grants/Private Funds	1	1	4
Other Source	7	5	14

¹ The values in this table represent the number of instances each funding source was reported and not the number of unique call centers. Some call centers reported multiple funding sources.

Source: OPPAGA survey of call centers.

Section 365.172, *Florida Statutes*, authorizes the use of E911 fees to fund call-taker training in “proper methods and techniques.”¹⁷ E911 funds may not be used for expenses incurred after the call transfer to the responding public safety agency, such as dispatch services and training dispatch personnel. These expenses must be funded through county, municipal, agency, or grant funds.

While 106 call centers were able to identify the source of their training funds, 88 identified specific training costs. Call centers reported that they spent an average of \$17,648 to train their call-takers, \$2,984 to train their dispatchers, and \$28,831 to train their dual call-taker/dispatchers during state or county Fiscal Year 2008-09.¹⁸

¹⁷ E911 funds may also be used to pay for salary and expenses for the county coordinator, a geographical data position and staff assistant; the acquisition, implementation, and maintenance of call center equipment and software; and the salary and expenses for E911 call-takers, supervisors, and managers.

¹⁸ Of the 88 unique call centers, 25 reported a training budget for call-takers, 5 reported a budget for dispatchers, and 79 reported a budget for call center staff performing both functions.

Is there a compelling state interest in requiring mandatory training for 911 call center staff?

Given public safety implications, the state has an interest in mandating training for 911 call center personnel. The Sunrise Act identifies factors that the state should consider when determining whether or not a profession should be regulated.¹⁹ The state is to determine whether regulation is necessary to protect the public and whether a profession requires specialized skills that are measurable. The state is also to determine if regulation will adversely restrict the practice of the occupation.

It appears that 911 call center staff meet these criteria, as these staff play a key role in linking law enforcement, fire, and medical professionals to citizens in emergency situations. Further, the skills required for 911 call center staff are specialized and readily measurable, as demonstrated by the training courses offered in Florida as well as other states. Requiring mandatory training of 911 call center staff would not appear to adversely restrict the ability of individuals who seek to practice this profession.

There are advantages and disadvantages of mandating certification for 911 call center staff.

Advantages

- Provides the public with assurance that call center employees are trained and qualified to perform their duties.
- Ensures consistency and uniformity in training standards across the state.
- Raises the professionalism of the vocation and makes it consistent with other professionals in the emergency management field (law enforcement, fire fighters, and medical technicians).
- May reduce on-the-job training needs in some counties.

¹⁹ Section 11.62, *F.S.*

- Helps protect call centers from liability issues.

Disadvantages

- Imposes a required cost on call centers and the local governments that employ these staff; E911 funding may not currently be used to fund dispatcher training.
- Does not prevent human error or ensure professional conduct.
- Does not account for differing training needs and dispatch practices among call centers. For example, law enforcement dispatching has different training needs than fire or medical dispatching.
- Does not take into account that small call centers may have difficulty managing staffing to meet training requirements.
- Few approved training programs are currently offered in the state. Local educational institutions or call centers would need to significantly increase the accessibility of certification training programs to meet a statewide training requirement.
- The state would need to establish a system to oversee compliance with training requirements, which would require funding.

The Legislature could consider several options for implementing mandatory training of 911 call center staff. Call centers could be required to submit their training curricula to the Florida Department of Health for approval. The majority of call centers that responded to our survey indicated that they use a written training curriculum during the initial formal training provided to new employees.²⁰ An advantage of this option is that the

approved call center curriculum would meet the framework requirements for certification. This would enable 911 call center staff that can document two years of relevant full-time employment to use the training provided by their agencies to meet state certification requirements upon payment of the \$75 application fee. A disadvantage of this option is that all call centers would need to develop a written training curriculum that meets the department's framework. As previously noted, only two call centers have received the Department of Health approval of their training curricula; therefore, this option also would require the Department of Health to review up to 233 training center curricula at no cost to call centers.²¹

A second option would be for the Legislature to direct the Department of Management Services to assist county coordinators and educational institutions in developing regional training programs that meet the requirements of the Department of Education's curriculum framework. These regional programs would offer training to all call centers in their area, and would avoid the need for each center to develop its own training curriculum and program. Staff seeking certification would be required to pay the \$75 application fee. Call centers would likely need to supplement the regional training with instruction on local policies and procedures.

A third option would be for the Legislature to direct the Department of Management Services to develop a statewide web-based training course that meets the Department of Education curriculum framework. A web-based certification training program would provide greater access to training for 911 staff. The Department of Management Services is currently working with the E911 Board to develop a prototype web-based 911 call-taking course using a federal grant

²⁰ Of the call centers that indicated whether they use a written training curriculum, 95% (40 of 42) use a written training curriculum for call-takers; 73% (22 of 30) use a written training curriculum for dispatchers; and 91% (75 of 82) use a written training curriculum for dual call-taker/dispatchers.

²¹ The Department of Health currently lacks statutory authority to charge a fee for reviewing training curricula.

award. While this training does not currently meet the Department of Education curriculum framework requirements, the Department of Management Services could submit the completed course curriculum to the Department of Health for approval.²² However, the Department of Management Services would need to obtain funding to develop similar training for other 911 staff, as the federal grant award stipulates that funds may only be used for a call-taker training software and equipment and excludes dispatcher training. Call centers would likely need to supplement the web-based program with practical instruction on local policies and procedures, including local dispatch codes and equipment.

For any of these options, the Legislature could consider whether to authorize local governments to use E911 funds for dispatcher training, as current law does not allow these monies to be used for this purpose. As an alternative, the Legislature could require individuals seeking employment in a 911 call center to pay for pre-service training. Individuals who currently seek 911 certification by taking courses at approved community college programs must pay tuition for these courses, and other law enforcement professions require persons seeking certification to attend a training academy and pass a state certification exam at their own expense.²³

The Department of Management Services indicates that the E911 fund could not realistically support mandatory training for all call center staff given its current revenue stream.²⁴ The E911 Board is currently

considering changes to allocation percentages for distribution of wireless revenues, which could further reduce the projected trust fund balance.²⁵ Accordingly, the Legislature would likely need to increase the 911 surcharge if it wished to cover training costs through this funding mechanism.²⁶ The surcharge for wireline subscribers is currently set by the E911 Board at 50 cents in all but three Florida counties, and the fee for wireless, voice-over-internet-protocol, radio, satellite, or other service providers also is 50 cents.²⁷ As shown in Exhibit 6, the surcharge assessed by other states varies, ranging from a low of 20 cents per wireline or wireless user in Arizona to a high of \$4.65 per wireline or voice-over-internet-protocol user in areas of West Virginia.

Board reported that fee revenue only covered 66% of allowable expenditures in Fiscal Year 2007-08.

²⁵ The E911 Board estimated the trust fund balance at approximately \$11 million as of June 2010. The board strives to maintain \$8-10 million in reserve, which is used to cover service provider cost recovery invoices, as well as to help provide funding for state emergency grant programs and matching funds for federal grant programs.

²⁶ The 50 cent surcharge cap has not been increased since the fee was implemented in 1985.

²⁷ Duval County and Lee County are currently charging 44 cents per month while Volusia County is charging 41 cents per month.

²² Currently, the prototype web-based training is an 8-hour course and would need to be greatly expanded to meet the Department of Education curriculum framework.

²³ In some cases, law enforcement agencies may hire a person on a temporary employment authorization and sponsor the applicant through a training academy, and may pay the tuition and salary of an officer trainee candidate.

²⁴ In its 2008 Annual Report to the Legislature, the E911

Exhibit 6

911 Surcharges Vary by State

State	Wireline Fee	Wireless Fee	Voice-over-internet-Protocol Fee
Arizona	20 cents	20 cents	20 cents
California	.67% of intrastate calls	.67% of intrastate calls	None
Florida	41 cents to 50 cents	50 cents	50 cents
Illinois	25 cents to \$3.20	72 cents; (\$2.50 for City of Chicago)	None
New York	35 cents	\$1.20 to \$1.50	None
Pennsylvania	\$1.00 to \$1.50	\$1.00	\$1.00
Texas	50 cents (varies in certain areas)	50 cents	50 cents
West Virginia	98 cents to \$4.65 (varies by county)	\$3.00	98 cents to \$4.65 (varies by county)

Source: National Emergency Number Association.

To reduce potential costs, the Legislature could establish mandatory training requirements for 911 call center staff that are lower than those currently required for certification. This would provide some level of assurance that 911 call center staff have a uniform minimum level of expertise while allowing individuals who seek a higher level of expertise to continue to seek voluntary certification. If provided through a statewide web-based system, the costs of providing training would be relatively low once the curriculum was developed. However, call centers would likely need to supplement a statewide minimum training course with practical, or on-the-job, instruction in order to provide staff with training on local dispatch

codes and equipment. While a statewide minimum training requirement would achieve some of the goals of statewide certification, it would provide a lower level of assurance that 911 call center staff are adequately trained to perform their public safety responsibilities.

Agency Response

In accordance with the provisions of s. 11.51(5), *Florida Statutes*, a draft of our report was submitted to the Secretary of the Department of Management Services for review and response. The Secretary's written response is in Appendices A.

Appendix A



Governor Charlie Crist

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January 21, 2010

Mr. Gary R. VanLandingham, Director
Office of Program Policy Analysis and
Government Accountability
111 West Madison St., Room 312
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Dear Mr. VanLandingham:

We have reviewed your preliminary and tentative report, **911 Call Center Training in Florida Varies; Options Exist for Creating Minimum Standards**.

We recognize the importance of training for call center staff and appreciate your careful consideration of the issues involved. The department will implement or assist other entities in implementing any options the Legislature should choose to designate.

We appreciate your staff's efforts and cordial working relationship over the past few months. If you need additional information, please contact Steve Rumph, Inspector General, at 488-5285.

Sincerely,

A handwritten signature in black ink, appearing to read 'LH South'.

Linda H. South
Secretary

cc: Marti Harkness, Staff Director, OPPAGA
Ken Granger, Chief of Staff
David Faulkenberry, Deputy Secretary
Charles Ghini, Director, Division of Telecommunications
John Ford, Chairman, E911 Board
Elizabeth Irvin, Legislative Affairs Director
Linda McDonald, Communications Director

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