

# **Central Minnesota Emergency Services Board**

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2022-2024 Regional Communication  
Interoperability Plan

Adopted July 27, 2022

# Section 1: Table of Contents

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- Section 2: Introduction .....3
- Section 3: Planning Considerations .....4
- Section 4: Regional Priorities.....8
  - 1. Secure funding for emergency communications equipment/technology. [Link](#)
  - 2. Provide emergency communications training and exercise opportunities to regional stakeholders. [Link](#)
  - 3. Promote the recruitment and retention of Public Safety Answering Point (PSAP) staff. [Link](#)
  - 4. Implement technology to improve 9-1-1 caller location accuracy. [Link](#)
  - 5. Increase stakeholder awareness and usage of regional Communication Unit (COMU) resources. [Link](#)
  - 6. Increase stakeholder awareness and usage of Communication Assets Survey and Mapping (CASM) resources. [Link](#)
  - 7. Increase stakeholder awareness and usage of Integrated Public Alert and Warning System (IPAWS) resources. [Link](#)
  - 8. Continue regional support of FirstNet and wireless broadband technology initiatives. [Link](#)
- Section 5: Monitoring Progress .....16
- Attachment A: Record of Changes .....17

## Section 2: Introduction

The Central Minnesota Emergency Services Board is one of seven regional Emergency Communications Boards (ECBs) and Emergency Services Boards (ESBs) in the state of Minnesota that have been established to provide local governance on matters related to emergency communications. The board’s membership includes representatives from the following entities:

- Benton County
- Big Stone County
- City of St. Cloud
- Douglas County
- Grant County
- Kandiyohi County
- Meeker County
- Mille Lacs County
- Morrison County
- Otter Tail County
- Pope County
- Stearns County
- Stevens County
- Swift County
- Todd County
- Traverse County
- Wadena County
- Wilkin County
- Wright County

Preparedness is defined by DHS/FEMA as "a continuous cycle of planning, organizing, training, equipping, exercising, evaluating, and taking corrective action in an effort to ensure effective coordination during incident response." Planning is a key component of the Preparedness Cycle (Figure 1) which provides an effective mechanism to support decision making, prioritize funding allocation, and measure progress toward building, sustaining, and delivering capabilities based on a jurisdiction’s/organization’s threats, hazards, and risks. Using this process, stakeholders gain a better understanding of the full breadth of actions that are necessary to build capabilities and allows for a more deliberate approach to multi-year preparedness activity planning.

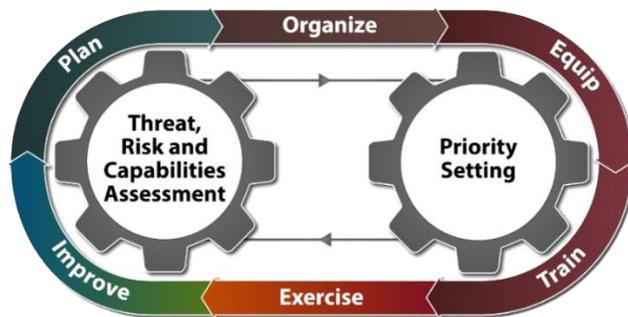


Figure 1: The Preparedness Cycle

This plan is intended to assist the members of the region in identifying key activities that are necessary to improve interoperable emergency communication capabilities across all four of Minnesota’s core emergency communications systems (9-1-1, land mobile radio, wireless broadband, and the Integrated Public Alert and Warning System). The region has identified the following priorities for consideration during this planning period (January 1, 2022 through December 31, 2024):

Regional Priorities
<a href="#">Secure funding for emergency communications equipment/technology.</a>
<a href="#">Provide emergency communications training and exercise opportunities to regional stakeholders.</a>
<a href="#">Promote the recruitment and retention of Public Safety Answering Point (PSAP) staff.</a>
<a href="#">Implement technology to improve 9-1-1 caller location accuracy.</a>
<a href="#">Increase stakeholder awareness and usage of regional Communication Unit (COMU) resources.</a>
<a href="#">Increase stakeholder awareness and usage of Communication Assets Survey and Mapping (CASM) resources.</a>
<a href="#">Increase stakeholder awareness and usage of Integrated Public Alert and Warning System (IPAWS) resources.</a>
<a href="#">Continue regional support of FirstNet and wireless broadband technology initiatives.</a>

## Section 3: Planning Considerations

The priorities identified in this plan are the high-level strategic objectives that will guide the region’s overall preparedness activities. The region used the following methodology to identify and define the priorities included in this plan:

- Gathering input from key stakeholders at the local, regional, and statewide level regarding potential priorities for improving interoperable emergency communication capabilities across the region.
- An assessment of the impact that current threats, hazards, and risks may have on the region’s interoperable emergency communication capabilities.
- An assessment of the impact that critical infrastructure and key resources located within the region may have on the region’s interoperable emergency communication capabilities.
- An assessment of the Planning, Organizational, Equipment, Training, and Exercise (POETE) activities that are necessary to achieve a particular priority.
- An assessment of other considerations (strategic plans, improvement plans, after action reports, etc.) that are relevant to improving interoperable emergency communication capabilities across the region.

### Stakeholder Engagement

Stakeholder engagement in the planning process is necessary to achieve both initial and long-term success. In developing the priorities outlined in this plan, input was obtained from a variety of stakeholders including county commissioners, sheriffs, other elected officials, senior leaders, emergency responders, technical staff, Public Safety Answering Point (PSAP) staff, emergency managers, and others involved in the regional governance process.

In developing the priorities outlined in this plan, the region relied heavily on the input obtained from its members during a series of facilitated strategic planning sessions conducted in Q1 2021. During these sessions, participants discussed the status of the current 2019-2021 Statewide Emergency Communication Board (SECB) strategic plan and identified actions that could be implemented on a regional and/or statewide basis to improve interoperable emergency communication capabilities across all four of Minnesota’s core emergency communication systems (9-1-1, Land Mobile Radio, Wireless Broadband, and Public Alert and Warning).

The following representatives from the region served as members of the planning team that developed the priorities outlined in this plan:

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## Threats, Hazards, and Risk Assessment

The Threat and Hazard Identification and Risk Assessment (THIRA) is a three-step risk assessment process that helps jurisdictions/organizations understand their risks and what they need to do to address those risks by answering the following questions:

- What threats and hazards can affect our jurisdiction/organization?
- If they occurred, what impacts would those threats and hazards have on our jurisdiction/organization?
- Based on those impacts, what capabilities should our jurisdiction/organization have?

Risk is the potential for an unwanted outcome resulting from an incident or occurrence, as determined by its likelihood and the associated consequences. In the THIRA, jurisdictions/organizations identify risks with the potential to most challenge their capabilities and expose areas in which the jurisdiction/organization is not as capable as it aims to be. These areas, or capability gaps, create barriers in a jurisdiction's/organization's ability to prevent, protect against, mitigate, respond to, and recover from a threat or hazard. Understanding the risks they face will make it easier for jurisdictions/organizations to determine what level of capability they should plan to build and sustain. Jurisdictions/organizations can use the information that comes from the THIRA process to answer five key strategic questions about their preparedness risks and capabilities:

- What do we need to prepare for?
- To be prepared, what level of capability do we need?
- What are our current capabilities?
- What gaps exist between the capability level we need and the capability level we currently have?
- How can we address our capability gaps?

The region considered two criteria when identifying threats and hazards for the assessment:

- The threat or hazard is reasonably likely to affect the region.
- The impact of the threat or hazard may have on the region's interoperable emergency communication capabilities.

As part of the THIRA process, the region also considered a variety of sources including local/state mitigation plans and a review of local, national, and global historical events.

The region identified the primary threats and hazards (natural, technological, and human caused incidents) that are present within the region (Figure 2). The items listed are most likely to present the greatest risk in terms of casualties, property damage, and impact on interoperable emergency communication capabilities.

Natural Hazards	Technological Hazards
<ul style="list-style-type: none"> <li>• Severe winter weather (blizzard, ice storm, etc.)</li> <li>• Severe storms (hail, wind, lightning, etc.)</li> <li>• Tornadoes</li> <li>• Floods</li> </ul>	<ul style="list-style-type: none"> <li>• Dam/levee failure</li> <li>• Hazardous material release</li> <li>• Train derailment</li> <li>• Structure collapse</li> <li>• Pipeline leak/explosion</li> <li>• Utility failures (power, fiber, etc.)</li> <li>• Nuclear power plant emergency</li> </ul>
Human-Caused Incidents	
<ul style="list-style-type: none"> <li>• Hostile threat/active shooter</li> <li>• Civil unrest</li> <li>• Chemical, Biological, Radiological, Nuclear, Explosive (CBRNE) attack</li> <li>• Cyber attack</li> <li>• Use of a vehicle as a weapon</li> </ul>	

Figure 2: Primary Threats and Hazards (Listed in no particular order)

### **Critical Infrastructure and Key Resources (CIKR) Inventory**

As a supplement to the THIRA process, the region also identified the most prevalent Critical Infrastructure and Key Resources (CIKR) present within the region as well as a number of recurring special events that typically draw large crowds (Figure 3). This data is a key component of the planning process because it allows jurisdictions/organizations to identify locations where technological and/or human-caused hazards are more likely to occur and where robust interoperable emergency communication capabilities are likely to be needed.

Critical Infrastructure and Key Resources	Mass Gatherings and Special Events
<ul style="list-style-type: none"> <li>• Rail lines</li> <li>• Pipelines</li> <li>• Dams/levees</li> <li>• Healthcare facilities</li> <li>• Public safety facilities</li> <li>• Other government facilities</li> <li>• Airports</li> <li>• Schools</li> <li>• Food production facilities</li> <li>• Industrial/manufacturing facilities</li> <li>• Transportation infrastructure (bridges, roadways, etc.)</li> <li>• Nuclear power generating plant</li> </ul>	<ul style="list-style-type: none"> <li>• High school stadiums</li> <li>• College auditoriums, stadiums, and sports complexes</li> <li>• Other sports complexes</li> <li>• Convention/event centers</li> <li>• Parks</li> <li>• Community events, festivals, fairs</li> </ul>

Figure 3: Critical Infrastructure and Key Resources (CIKR) / Mass Gatherings and Special Events

## The Interoperability Continuum

Achieving emergency communications interoperability is a multi-dimensional challenge. For example, when a region procures new equipment, that region should develop standard operating procedures that govern its use and conduct training and exercises to ensure that emergency responders know how to use the equipment effectively.

To help ensure that a comprehensive approach to improving interoperable emergency communication capabilities across the region was adopted, the region also referenced the U.S. Department of Homeland Security's SAFECOM Interoperability Continuum (Figure 4). The Interoperability Continuum is designed to assist jurisdictions/organizations with their efforts to build and sustain their interoperable emergency communication capabilities. The continuum identifies five critical success elements (Governance, Standard Operating Procedures (SOPs), Technology (Voice and Data), Training and Exercises, and Usage) that must be addressed to achieve a robust interoperability solution.

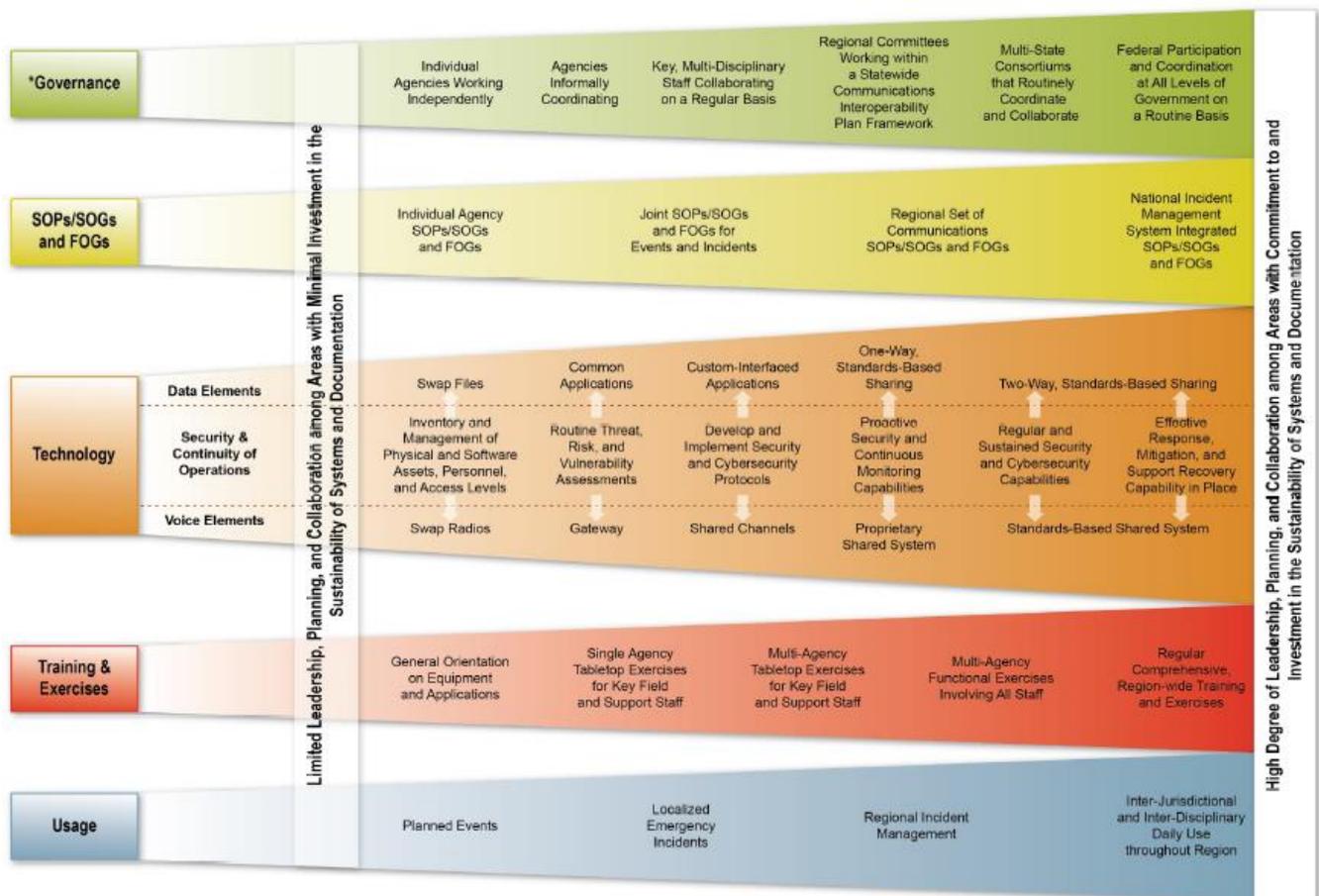


Figure 4: The Interoperability Continuum

## Other Considerations

In developing the priorities identified in this plan, the region also considered the following factors:

- In Q1 2021, the Minnesota Department of Public Safety-division of Homeland Security and Emergency management (HSEM) hosted an Integrated Preparedness Planning Workshop (IPPW). 'Operational Communications' was one of the core capability gaps identified by stakeholders involved in this process.

## Section 4: Regional Priorities

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### Secure Funding for Emergency Communications Equipment and Technology

During this planning period, the region intends to advocate for, and secure, adequate funding to build and sustain interoperable emergency communication capabilities at a local, regional, and statewide level. Actions aligned with achieving this priority include:

#### Planning:

- Identify strategies to increase inform/educate stakeholders at the local, regional, statewide, and federal levels regarding the need for ongoing funding to support each of Minnesota's four core emergency communication systems (9-1-1, Land Mobile Radio, Wireless Broadband, and Integrated Public Alert and Warning System).

#### Organizational:

- Prepare and maintain a list of potential grant funded projects that will help build and/or sustain interoperable emergency communication capabilities at the local/regional level.
- Advocate for ongoing funding at the regional, state, and federal levels to support existing/future emergency communications equipment/technology needs.
- Submit requests for grant funding to support projects intended to build and/or sustain the region's emergency communications capabilities.
- Explore alternative funding mechanisms to support existing/future emergency communications equipment/technology needs.

#### Equipment:

- N/A

#### Education, Training, and Exercise:

- Ensure that regional stakeholders are aware of the need to address the lifecycle sustainment needs of existing emergency communications equipment/technology in their budget process.
- Ensure that decision makers at the local, regional, state, and federal levels are aware of the ongoing need for funding to support emergency communications equipment/technology.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

#### Ownership:

- Central MN Emergency Services Board Committees primarily the RAC Committee

## **Provide Training and Exercise Opportunities to Regional Stakeholders**

During this planning period, the region intends to provide emergency communications training and exercise opportunities to regional stakeholders. Actions aligned with achieving this priority include:

### **Planning:**

- Identify the emergency communications training and exercise needs of regional stakeholders.
- Identify strategies for meeting the training and exercise needs of regional stakeholders.
- Identify strategies to inform/educate regional stakeholders regarding Minnesota's four core emergency communication systems (9-1-1, Land Mobile Radio, Wireless Broadband, and Integrated Public Alert and Warning System).

### **Organizational:**

- Conduct an annual needs assessment that identifies the training and exercise necessary to build and/or sustain the region's interoperable emergency communication capabilities. This assessment will include references to the intended audience (technical staff, end-users, disciplines, jurisdictions, etc.), the appropriate methods to fulfill those needs (locally regionally, vendor provided, on-line training, state-supported, etc.), the frequency (annual, monthly, etc.), and potential funding sources.
- Advocate for, and secure, funding to provide emergency communications related training and exercise opportunities to stakeholders within the region.
  - NOTE: Certain training and exercise activities may be eligible for SECB grant funding.
  - NOTE: Certain training and exercise activities may be eligible for State Homeland Security Program (SHSP) grant funding.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Engage government agencies, public safety professional associations, and other key organizations at the local/regional level to help promote awareness and understanding of emergency communications related topics.
- Encourage regional stakeholders to conduct informal outreach at the local level to help promote awareness and understanding of emergency communications related topics.
- Host an annual awareness-level training session to provide an opportunity for regional stakeholders to gain a deeper understanding and appreciation of Minnesota's four core emergency communication systems (9-1-1, Land Mobile Radio, Wireless Broadband, and Integrated Public Alert and Warning System) and the actions necessary to support them.
- Schedule and deliver a variety of emergency communications related training exercise activities for stakeholders representing all public safety disciplines.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the O&O/User Committee

## **Promote the Recruitment and Retention of PSAP Staff**

During this planning period, the region intends to identify strategies for improving the recruitment and retention of Public safety Answering Point (PSAP) personnel. Actions aligned with achieving this priority include:

### **Planning:**

- Survey regional stakeholders to gain a better understanding of current PSAP operations.
- Identify potential strategies for improving Public Safety Telecommunicator recruiting and retention efforts.
- Identify strategies to inform/educate regional stakeholders regarding the work performed within the region's PSAPs.

### **Organizational:**

- Solicit participation in a PSAP survey that includes the following elements:
  - Authorized/current staffing levels
  - Total # of work stations
  - Minimum staffing requirements
  - Call volumes
  - Shift scheduling
  - Pay scale and benefits
  - Initial and ongoing training requirements
  - Ancillary duties performed by PSAP personnel
  - Wellness programs
  - Existing recruiting and retention strategies
- Develop a Public Safety Telecommunicator recruiting and retention plan. This plan will include strategies to identify potential applicants, promote broader awareness regarding the knowledge, skills, and abilities required to work within the PSAP, increase awareness and understanding regarding the duties performed by Public Safety Telecommunicators, employment opportunities within the region's PSAPs, and recommended 'best practices' to promoting employee retention.
- Advocate for legislation, funding, and other resources that promote the recruitment and retention of Public Safety Telecommunicators.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Conduct outreach to inform/educate regional stakeholders regarding the work performed within the region's PSAPs.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the NG911 Committee

## **Implement Equipment/Technology to Improve 9-1-1 Caller Location Accuracy**

During this planning period, the region intends to implement technology to improve the location accuracy of 9-1-1 callers. Actions aligned with achieving this priority include:

### **Planning:**

- Identify potential equipment/technology solutions that can be implemented within a Public Safety Answering Point (PSAP) to improve the location accuracy of 9-1-1 callers.

### **Organizational:**

- Engage DPS-ECN, vendors, and cellular service providers to identify opportunities for introducing new 9-1-1 caller location accuracy equipment/technology into the region's PSAPs.
- Advocate for, and secure, the funding necessary to implement new 9-1-1 caller location accuracy equipment/technology into the region's PSAPs.
- Coordinate the implementation of new 9-1-1 caller location accuracy equipment/technology in the region's PSAPs.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Provide regional stakeholders with training opportunities to become familiar/proficient with new 9-1-1 caller location accuracy equipment/technology.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the NG911 Committee

## **Increase Stakeholder Awareness and Usage of Regional Communications Unit (COMU) Resources**

During this planning period, the region intends to increase stakeholder awareness and usage of regional Communications Unit (COMU) resources. Actions aligned with achieving this priority include:

### **Planning:**

- Identify strategies to inform/educate regional stakeholders regarding the Communications Unit (COMU) resources available within the region.
- Identify strategies for providing ongoing training and exercise opportunities to Communications Unit (COMU) personnel within the region.
- Identify strategies for promoting the use of Communications Unit (COMU) resources within the region.
- Identify strategies to promote increased regional participation in the Communications Unit (COMU) program.

### **Organizational:**

- Encourage regional stakeholders to utilize regional Communications Unit (COMU) resources as part of their planning, response, and recovery efforts related to special events, disasters, and large-scale emergencies occurring within their jurisdictions.
- Explore the possibility of creating a formal Communications Unit (COMU) team within the region.
- Advocate for ongoing training and exercise opportunities for regional Communications Unit (COMU) personnel.
- Advocate for, and secure, funding to provide regional Communications Unit (COMU) personnel with training and exercise opportunities.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Create 'fact sheets' and other reference materials to provide information on the Communications Unit (COMU) resources available within the region.
- Conduct outreach to inform/educate regional stakeholders regarding Communications Unit (COMU) resources.
- Provide regional Communications Unit (COMU) personnel with regular opportunities to participate in COMU specific training and exercise activities conducted at the local/regional level.
- Identify opportunities to incorporate Communications Unit (COMU) resources into existing training and exercise activities being conducted within the region.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the O&O/User Committee

## Increase Stakeholder Awareness and Usage of Communication Assets Survey and Mapping (CASM) Resources

During this planning period, the region intends to increase stakeholder awareness and usage of Communications Assets Survey and Mapping (CASM) resources. Actions aligned with achieving this priority include:

### Planning:

- Identify strategies to inform/educate regional stakeholders regarding the Communication Assets Survey and Mapping (CASM) resource.
- Identify strategies to promote increased regional participation in maintaining the information residing within the Communication Assets Survey and Mapping (CASM) resource.
- Identify strategies for providing ongoing training opportunities for regional stakeholders to promote familiarity with the Communication Assets Survey and Mapping (CASM) resource.
- Identify strategies for promoting usage of the Communication Assets Survey and Mapping (CASM) resource at the local, regional, and statewide levels.

### Organizational:

- Encourage regional stakeholders to utilize the Communication Assets Survey and Mapping (CASM) resource as part of their planning, response, and recovery efforts related to special events, disasters, and large-scale emergencies occurring within their jurisdictions.
- Advocate for the ongoing use and sustainment of the Communication Assets Survey and Mapping (CASM) resource.
- Advocate for, and secure, funding to provide regional stakeholders with training opportunities to become familiar with usage of the Communication Assets Survey and Mapping (CASM) resource.

### Equipment:

- N/A

### Education, Training, and Exercise:

- Conduct outreach to inform/educate regional stakeholders regarding the Communication Assets Survey and Mapping (CASM) resource.
- Provide training opportunities to regional stakeholders so they can become familiar with usage of the Communication Assets Survey and Mapping (CASM) resource.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### Ownership:

- Central MN Emergency Services Board Committees primarily O&O/User Committee

## **Increase Stakeholder Awareness and Usage of Integrated Public Alert and Warning System (IPAWS) Technology**

During this Integrated Preparedness Cycle, the region intends to increase stakeholder awareness and usage of Integrated Public Alert and Warning System (IPAWS) technology. Actions aligned with achieving this priority include:

### **Planning:**

- Identify strategies to inform/educate regional stakeholders regarding Integrated Public Alert and Warning System (IPAWS) technology.
- Identify strategies for promoting increased usage of Integrated Public Alert and Warning System (IPAWS) technology within the region.
- Identify strategies for providing ongoing training and exercise opportunities to regional stakeholders regarding Integrated Public Alert and Warning System (IPAWS) technology.

### **Organizational:**

- Promote increased awareness and utilization of Integrated Public Alert and Warning System (IPAWS) technology.
- Advocate for DPS-ECN to provide ongoing training opportunities regarding Integrated Public Alert and Warning System (IPAWS) technology.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Conduct outreach to inform/educate regional stakeholders regarding Integrated Public Alert and Warning System (IPAWS) technology.
- Provide regional stakeholders with regular opportunities to participate in training activities related to Integrated Public Alert and Warning System (IPAWS) technology.
- Promote the inclusion of Integrated Public Alert and Warning System (IPAWS) technology into existing exercise activities being conducted within the region.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the EMAC Committee

## **Advocate and Support FirstNet and Wireless Broadband Initiatives**

During this planning period, the region intends to continue its advocacy and support of FirstNet and wireless broadband initiatives at the local, regional, and statewide level. Actions aligned with achieving this priority include:

### **Planning:**

- Identify strategies to inform/educate regional stakeholders regarding FirstNet and wireless broadband initiatives.
- Identify strategies to advocate for additional FirstNet coverage, capacity, and quality of service to meet the needs of regional stakeholders.
- Identify strategies to inform/educate regional stakeholders regarding mobile device applications that are available to provide situational awareness, interoperable communications (voice and data) and, operational coordination among and across jurisdictions/disciplines.

### **Organizational:**

- Identify locations where additional FirstNet coverage, capacity, and quality of service are necessary to meet the needs of regional stakeholders.
- Engage representatives from FirstNet and other service providers to ensure that adequate coverage, capacity, and quality of service are available to meet the needs of regional stakeholders.
- Advocate for continued funding and support of FirstNet and other wireless broadband initiatives.

### **Equipment:**

- N/A

### **Education, Training, and Exercise:**

- Conduct outreach to inform/educate regional stakeholders regarding FirstNet and wireless broadband technology.
- Training and Exercise: The region will conduct outreach to inform/educate regional stakeholders regarding mobile device applications that are available to provide situational awareness, interoperable communications (voice and data) and, operational coordination among and across jurisdictions/disciplines.

NOTE: It is understood that feedback and approval from stakeholders within the regional governance structure will be necessary before proceeding with the action item(s) outlined under this priority.

### **Ownership:**

- Central MN Emergency Services Board Committees primarily the RAC Committee and O&O/User Committee

## Section 5: Monitoring Progress

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This plan is a dynamic document that should be reviewed on a regular basis to assess progress towards achieving the region's priorities. By continuously monitoring progress towards achieving these priorities, the region can ensure that they are on the right path to build, sustain, and deliver interoperable emergency communication capabilities.

The board and its committees are encouraged to incorporate a 'Planning Progress Report' into their regular meeting agenda to help ensure that their actions are aligned with those necessary to achieve each priority. Examples of topics for board and committee discussion include:

- What changes to our planning efforts might be necessary to help achieve this priority?
- What changes to organizational structures might be necessary to help achieve this priority?
- What equipment and/or resources might be necessary to help achieve this priority?
- What education and outreach activities should be conducted to help achieve this priority?
- What training opportunities should be scheduled to help achieve this priority?
- What types of exercise activities can be conducted to help measure progress towards achieving this priority?

### Plan Review

The region will conduct an annual plan review to provide stakeholders with an opportunity to assess the region's progress towards completing the actions identified under each priority. The assessment includes three key components:

#### Assess Capabilities:

- What are the current capability levels across each of Minnesota's four core emergency communication systems (9-1-1, Land Mobile Radio, Wireless Broadband, and Integrated Public Alert and Warning System)?
- How have those capabilities changed over the past year?
- How do the current capability levels align with the 'desired state' outlined in the plan?

#### Identify Capability Gaps and Intended Approaches to Address Them:

- What gaps exist between the capabilities we want to achieve and the capabilities we currently have?
- Do the priorities outlined in the plan align with closing the capability gaps?
- What, if any, changes to the plan are necessary to address the capability gaps?

#### Describe the Impacts of Funding Sources:

- What impact did different funding sources, including grants, have on building or sustaining the capabilities assessed by the capability targets over the last year?
- What, if any, changes to the plan are necessary to address any funding concerns?

### Plan Updates

Based on the recommendations identified through the improvement planning and annual plan review processes, the appropriate sections of this plan will be updated as necessary. Changes to the contents of this plan will be documented in Attachment A (Record of Changes).

