



Emergency Telephone System Board Of DuPage County Memorandum

TO: Chair Schwarze and ETS Board members
FROM: Linda Zerwin, Executive Director
DATE: August 5, 2025
SUBJECT: ETSB Policies 911-010: Expenditure Policy, 911-018: System Administrator, and 911-013.1: 9-1-1 System Interface Access and Fees

Background:

Before the ETS Board on the August agenda are the above three policies. Some of these policies were reviewed and updated earlier this year and one was in the process of being updated when Member Robb submitted suggested changes to previously updated policies. They are brought now as they interact with each other and should be considered by the ETS Board together. All proposed changes to the policies have been made in redline.

911-010: Expenditure Policy: This policy has been in effect since 2009. There have been several unsuccessful attempts to update it. With the changes in the ETSA statute and administrative rules, it is important to move forward with this policy. Additionally, certain language proposed by Member Robb may, depending on the ETS Board's direction, work better in this policy versus 911-013.1: 9-1-1 System Interface Access and Fees. An original copy of the policy is included along with the clean and redline copy. This policy has also been moved into the current policy format.

Strike outs in this policy are made to delete or change language that no longer applies, or is inconsistent with current State Statutes, Administrative Rules, and Federal laws.

In the proposed amendments to 911-013.1, Member Robb added a #6 to Purpose. As there is no difference in the process for access for member agencies, whether PSAPS or not, the concern expressed by DU-COMM is budgetary. This concept has been moved to the 911-010: Expenditure Policy to address DU-COMM's concern in the appropriate policy.

Definitions have been added for clarity.

In Section 1.A: the cites have been corrected to current statute and (b) has been updated. With respect to the strike out of the last paragraph in Section A, in 2008-9 because the Emergency Telephone System Act stated the following language below, this paragraph no longer applies. Additionally, some examples have been amended for clarity.

The 2008-9 language is included below for your reference:

"750/15.4. Emergency Telephone System Board; powers

§ 15.4. (a) The corporate authorities of any county or municipality that imposes a surcharge under Section 15.3 shall establish an Emergency Telephone System Board. The corporate authorities shall provide for the manner of appointment and the number of members of the Board, provided that the board shall consist of not fewer than 5 members, one of whom may be a public member who is a resident of the local exchange service territory included in the 9-1-1 coverage area, one of whom (in counties with a population less than 100,000) may be a member of the county board, and at least three of whom shall be representative of the 9-1-1 public safety agencies, including but not limited to police departments, fire departments, emergency medical



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services providers, and emergency services and disaster agencies, and appointed on the basis of their ability or experience. Elected officials are also eligible to serve on the board. Members of the board shall serve without compensation but shall be reimbursed for their actual and necessary expenses. Any 2 or more municipalities, counties, or combination thereof, that impose a surcharge under Section 15.3 may, instead of establishing individual boards, establish by intergovernmental agreement a Joint Emergency Telephone System Board pursuant to this Section. The manner of appointment of such a joint board shall be prescribed in the agreement.

(b) The powers and duties of the board shall be defined by ordinance of the municipality or county, or by intergovernmental agreement in the case of a joint board. The powers and duties shall include, but need not be limited to the following:

- (1) Planning a 9-1-1 system.*
- (2) Coordinating and supervising the implementation, upgrading or maintenance of the system, including the establishment of equipment specifications and coding systems.*
- (3) Receiving monies from the surcharge imposed under Section 15.3, and from any other source, for deposit into the Emergency Telephone System Fund.*
- (4) Authorizing all disbursements from the fund.*
- (5) Hiring any staff necessary for the implementation or upgrade of the system.*

(c) All monies received by a board pursuant to a surcharge imposed under Section 15.3 shall be deposited into a separate interest-bearing Emergency Telephone System Fund account. The treasurer of the municipality or county that has established the board or, in the case of a joint board, any municipal or county treasurer designated in the intergovernmental agreement, shall be custodian of the fund. All interest accruing on the fund shall remain in the fund. No expenditures may be made from such fund except upon the direction of the board by resolution passed by a majority of all members of the board. Expenditures may be made only to pay for the costs associated with the following:

- (1) The design of the Emergency Telephone System.*
- (2) The coding of an initial Master Street Address Guide data base, and update and maintenance thereof.*
- (3) The repayment of any monies advanced for the implementation of the system.*
- (4) The charges for Automatic Number Identification and Automatic Location Identification equipment, a computer aided dispatch system that records, maintains, and integrates information, mobile data transmitters equipped with automatic vehicle locators, and maintenance, replacement and update thereof.*
- (5) The non-recurring charges related to installation of the Emergency Telephone System and the ongoing network charges.*
- (6) The acquisition and installation, or the reimbursement of costs therefor to other governmental bodies that have incurred those costs, of road or street signs that are essential to the implementation of the emergency telephone system and that are not duplicative of signs that are the responsibility of the jurisdiction charged with maintaining road and street signs.*
- (7) Other products and services necessary for the implementation, upgrade and maintenance of the system and any other purpose related to the operation of the system, including costs attributable directly to the construction, leasing, or maintenance of any buildings or facilities or costs of personnel attributable directly to the operation of the system. Costs attributable directly to the operation of an*



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emergency telephone system do not include the costs of public safety agency personnel who are and equipment that is dispatched in response to an emergency call.

(d) The board shall complete the data base before implementation of the 9-1-1 system. The error ratio of the data base shall not at any time exceed 1% of the total data base.

P.A. 79-1092, § 15.4, added by P.A. 85-978, § 4, eff. Dec. 16, 1987. Amended by P.A. 86-101, § 2, eff. July 26, 1989; P.A. 86-1350, § 1, eff. Jan. 1, 1991; P.A. 87-146, § 2, eff. Aug. 20, 1991; P.A. 88-497, § 5, eff. Sept. 13, 1993. P.A. 90-698, § 15, eff. August 7, 1998.

In Section 1.B: Non-Surcharge Funds, the cites and titles have been updated.

In Section 1.C: Expenditures and Funds, the cites, titles and gender references have been updated.

In Section 2: Budget Process and Requests, there is new language. This section references the County Budget Calendar, and formalizes the Ad Hoc Finance Committee.

Additionally, there is a section for Required vs Allowable Costs. While DU-COMM would like to establish a process to allow access for “real time” applications by PSAPs for specific allowable expenditures of 9-1-1 surcharge funds that were not previously budgeted by the ETS Board, there are several points to consider:

1. If the cost is an allowable expense, then ETSB should buy it in its entirety (software and interface) and manage it making it available to both PSAPs to be consistent with the overarching goal of standardization. If the ETS Board does not approve a cost in its entirety, then the PSAP may proceed like any other member agency and purchase the software and interface on its own.
2. Being at the purchasing whim of the PSAPs, or any other member agency, during the budget cycle for unbudgeted expenses can be a slippery slope. Inserting a new program because a PSAP “wants it” does not make it critical to the 9-1-1 System. There is a process for new programs and initiatives. Working outside of that process could create budgetary issues.

Additionally, while not always successful, ETSB does attempt to schedule projects. Inserting unbudgeted, new services or programs into the workload may delay project timelines of 9-1-1 core components.

Finally, the ETS Board is designated as the sole entity entrusted with expending 9-1-1 surcharge funds. 50 ILCS 750/15.4(c), DuPage County Ord 20-40. The ETS Board is not granted the authority to delegate that responsibility, even to the PSAPs.

3. ETSB operates on the lighter side of staffing of personnel. This is accomplished because the 9-1-1 System is manageable. Opening the door to this type of whim purchasing could create the need for more staff.



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4. Member Franz requested a policy that accounted for ETSB staff time for ancillary systems. This policy should be applied uniformly to all agencies' individual projects, including PSAPs. The PSAP is there for the member agencies and the surcharge comes from the taxpayers, therefore, the policy should be applied equally.
5. The ETSB has a process to assist the PSAPs with allowable costs that they do not want ETSB to consider paying for. Executed in 2023, Resolution #ETS-R-0056-23 provides \$1M to the PSAPs for allowable costs annually. DU-COMM's portion of this \$1M is \$650,000.
6. If one of the goals of standardization of the core equipment is to be able to provide additional funds to the PSAPs, as detailed in Resolution #ETS-R-0056-23, then paying for interfaces for software and equipment demanded by a member agency outside of the budgetary process, simply because the expenditure is allowable, should not be done.
7. The PSAPs act on behalf of their members. This means that if certain software and equipment are allowable costs, but not procured by the ETSB for its member police and fire agencies, a PSAP could manipulate its favored status to, in effect, force the ETSB to pay for systems or services, despite the fact that 1) different systems or services may already be provided (regardless of whether they are core systems), 2) the additional systems or services are not budgeted and may not have been procured consistently with DuPage County procurement requirements, and 3) the ETSB did not have the opportunity to consider the utility of the system or service prior to purchase. There should be language to specifically prohibit this.

With respect to Member Robb's recommended language for 911-013.1: 9-1-1 System Interface Access and Fees of "*Occasionally, a PSAP may request reimbursement or funding for a project not procured or contracted through the ETSB. It is the policy of the ETSB to support the PSAPs in their mission to provide high-quality 9-1-1 services to the residents of DuPage County. Therefore, if the requested expenditure is an allowable use of 9-1-1 surcharge funds, it may be submitted to the ETS Boards for consideration through a budget request, a budget amendment, or the use of contingency funds. The ETS Boards retains the authority to approve or deny such requests.*"

The statutory duties of the ETSB include: #1 Planning a 9-1-1 system, and #2 coordinating and supervising the implementation, upgrading or maintenance of the system, including the establishment of equipment specifications and coding systems. 50 ILCS 750/15.4(b). Although supporting the PSAPs is an important consideration, it is not accurate to say that the policy of the ETSB is "to support the PSAPs in their mission to provide high-quality 9-1-1 services to residents of DuPage County." Rather, the ETSB's duty is to provide a 9-1-1 System that can receive a 9-1-1 call and dispatch to the point of arrival. It is the PSAPs' duty to provide high-quality 9-1-1 services to residents of DuPage County. While the ETSB should support the PSAPs where possible, it should only do so once the statutory needs of the system have been met and should never do so at the expense of the system. The ETSB and the PSAPs have already agreed to this in the IGA under Resolution #ETS-R-0056-23:



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Section 4.1: Financial Objectives. The Parties agree that 9-1-1 services are provided by the citizen 9-1-1 surcharge. (ETSB) and taxpayer general fund property taxes (PSAP). The Parties agree that certain citizens are, therefore, contributing to 9-1-1 services in both general fund and surcharge payments. The Financial objectives shall:

- A. seek to find additional ways to reduce the cost to the citizen for delivery of 9-1-1 service from the ETSB and the PSAPs while meeting their expectations; and
- B. seek to continue a financially sustainable model to provide long term funding for 9-1-1 services in the ETSB geographic service area.

And in section 4.3.1 of the IGA it states "The grant shall only be made if the ETSB has met all of its core financial obligations in providing for the operation/maintenance of the 9-1-1 System and capital equipment replacement."

The expenditure of 9-1-1 surcharge funds for any additional equipment and software beyond the core equipment mandated by the ETSA, without discussion and approval from the ETS Board, delegates the ETSB's sole responsibility as steward of these restricted funds to any agency that purchases something that is considered an "allowable cost." It is not a best practice to allow purchases outside of the budget and procurement process unless there is an emergency or critical situation. Member Robb's language has been incorporated into this policy with certain language changes set forth below.

A PSAP may request reimbursement or funding for a project not procured or contracted through the ETSB during the budget process if it is an allowable use of 9-1-1 surcharge funds. If it is outside of the Budget Process, it may be submitted on the appropriate DuPage County Budget Form to the Executive Director for review. The Executive Director will include the status of the Budget and whether sufficient funds exist for the request, if approved, as well as the future impact to additional Fiscal Years. The ETS Board may approve or deny such requests.

As noted below, under policy 911-013.1, there is no difference in the process for interface access, the concern expressed by DU-COMM is who should pay for it. The cost outlined in Policy 911-013.1 would apply if the reimbursement request is denied. With respect to the language moved from #6 in the 911-013.1: 9-1-1 System Interface Access and Fees, the ETSB staff recommends the following language changes:

First, the term budget amendment is not the proper process. If the ETSB did not have sufficient funds, it would have to determine whether it would ask for an additional budget appropriation through the County Board. Additionally, the final sentence containing "Staff time spent supporting the PSAP will not be billed" should be rejected. In this case, the PSAP should be treated the same as any other agency is tasked with reviewing requests under the security policy and determining with the Tech Focus Group viability, technical feasibility and impact to security, and the capacity of the 9-1-1 System. Work for a project or interface that the ETSB does not pay for should be treated the same for all the member agencies and ETSB staff time should be reimbursed.

Further, the ESTB staff propose the following additional language: *A PSAP may use the 9-1-1 surcharge provided to it through Resolution #ETS-R-0056-23 to pay for interface access for "real time" applications requested by a PSAP for specific, allowable, expenditures of 9-1-1 surcharge funds that were not previously budgeted by or approved by the ETS Board.*



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911-018: System Administrator: This policy has been in effect since 2019. It is being updated to reflect the changes in the ETSA statute and administrative rules. This policy details the goals of standardization and lists the core equipment provided by ETSB. It should be considered along with ETSB Policies 911-010: Expenditure Policy, and 911-013.1: 9-1-1 System Interface Access and Fees. Taken together, these three policies will allow ETS Board members to get a better understanding of the operations and goals of the 9-1-1 System currently in place.

In this policy, the Additional Authority section statutes and administrative codes that do not apply have been stricken. Under Goals, Emergency Law Enforcement Dispatch is stricken because it is not a software owned by ETSB. At the time of the policy, DU-COMM was considering it but then declined it and later abandoned the Q&A (Quality Assurance) program offered by Priority Dispatch. Also under Goal, the language has been corrected to reflect that after consolidation, there are now only two PSAPs, not three.

Under Policy Statement, statutory updates have been made, the Deputy Director of IT has been added (a position that did not exist in 2019). The word direction has been substituted for supervision.

In Section 3, the term 9-1-1 System Memo as been added. The previous term used to describe this form was Evaluation Request Form. Recommended Stakeholder Groups has been changed to Focus Groups to reflect the ordinance language changes. Language has been added to account for the use of Monday.com and dashboards and help desk emails have been updated.

911-013.1: 9-1-1 System Interface Access and Fees: This policy has been in effect since March of 2025. It is an off shoot of 911-013.1: Information Technology and Network Security that was updated to reflect current systems and network requirements. 911-013 is the starting point for access to the 9-1-1 System. 911-013.1 is the policy that details the costs associated with access.

With respect to Member Robb's edits:

Under Purpose:

- #1 The addition of PSAPs is redundant to user agencies. PSAPs are a user agency.
- #4 The deletion of "or systems not procured by ETSB that the ETS Board has not previously authorized 9-1-1 surcharge expenditures for, speaks to the concerns expressed in the itemized points to consider in the 911-010: Expenditure Policy explanation above.
- #6 The addition of this item, "To establish a process to allow access for "real time" applications requested by PSAPs for specific, allowable expenditures of 9-1-1 surcharge funds that were not previously budgeted by the ETS Board." As stated earlier, this policy is for costs, language has been added to 911-010: Expenditure Policy. Under Purpose, Member Robb has added a #6. There is no difference in the process for access, the concern expressed by DU-COMM is budgetary, the cost would apply if the Board denies the budget request.

However, the ETS Board will have to decide if there should be a distinction between the user agencies of police and fire and the PSAPs. The police and fire agencies may also wish to purchase systems that are considered allowable. The ETS Board will have to determine where to draw the line.



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Under Scope:

This policy shall apply to the ETSB Executive Director, staff, and all formal committees and subcommittees authorized and appointed by the DuPage ETS Board or the DuPage County Board for certain duties and special projects as a process to facilitate the approval of time and material change contracts, and to account for ETSB staff time, for the purpose of creating an interface for requested applications that connect to the 9-1-1 System or utilize CAD but [may](#) be paid for by user agencies because the application is not suitable for the use of 9-1-1 surcharge funds [or because the expenditure request was/is not approved by the ETS Board.](#)

The redline is the language submitted by Member Robb, after deleting "or was not procured by ETSB, and the ETS Board has not previously authorized ETSB to expend surcharge funds to facilitate the connection of the application." The change is a distinction without a difference. In legal terms, basically where two things or concepts are presented as being distinct or different, but in reality, they are essentially the same or have no practical or legal consequence for differentiating between them. Given this, ETSB staff recommends the ETSB utilize the language provided by the States Attorney's Office.

Under Policy Statement

The addition of the fourth paragraph, "Occasionally, a PSAP may request reimbursement or funding for a project not procured or contracted through the ETSB. It is the policy of the ETSB to support the PSAPs in their mission to provide high-quality 9-1-1 services to the residents of DuPage County. Therefore, if the requested expenditure is an allowable use of 9-1-1 surcharge funds, it may be submitted to the ETS Boards for consideration through a budget request, a budget amendment, or the use of contingency funds. The ETS Boards retains the authority to approve or deny such requests."

This language has been moved to the 911-010: Expenditure Policy.

Under Fees:

Member Robb has added "Any time spent on projects that do not qualify as allowable uses of 9-1-1 surcharge funds must be reimbursed accordingly." And deleted, "Therefore, their time must be reimbursed." The recommendation is to keep the original language. Again, the concern is budgetary and not process. If the budget request is denied, then costs should be the same for a project outside of the core system regardless of whether it is an allowable expense. Simply being allowable does not obligate the ETSB to reimburse the cost of an unbudgeted expense or a denied expense.

Member Robb has added "If the interface in question directly supports 9-1-1 services and qualifies for the use of 9-1-1 surcharge funds, but the associated project and expenses were not previously approved and budgeted by the ETS Board, the requesting agency must submit a budget amendment request to the ETS Board seeking authorization to use contingency funds for the expenditure. If the ETS Board does not approve the request, any costs related to the interface will be billed to the requesting agency. However, if the requesting agency is a PSAP within the DuPage ETSB system, only the cost of the interface itself will be charged to the PSAP. Staff time spent supporting the PSAP will not be billed."

This has been moved to 911-010 and addressed above.



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Within the Memorandum of Understanding:

Under Other 9-1-1 System Component: Member Robb has removed “not procured by ETSB for which ETS Board has not previously authorized the expenditure of 9-1-1 surcharge funds) at the cost of the requesting agency.”

Under Purpose and scope: Member Robb has submitted the following changes - Further, this Agreement between the parties is to formalize payment for an interface whose cost is the responsibility of the requesting agency(s) and ~~either not suitable for support with 9-1-1 surcharge funds or not procured by the ETSB and the ETS Board has not previously authorized the expenditure of 9-1-1 surcharge funds for the interface of the application that tis the subject of this MOU.~~

Under Background: Member Robb has submitted the following changes - Phase 2 of the DuPage Justice Information System (DuJIS), additional applications and interfaces, has been evolving since “go live” in 2019. This MOU will be for Agencies that have requested interface connections to the 9-1-1 System for applications that cannot be supported with 9-1-1 surcharge funds ~~or where the ETSB has not procured the application and the requesting agency has not requested ETSB to purchase the software, does not want ETSB to purchase the software, or the ETS Board has not previously authorized the use of 9-1-1 surcharge funds for the interface or software.~~

For the reasons already set forth above, ETSB Staff recommends that these changes be rejected.

These three policies and the changes recommended when considered with the IGA executed under Resolution #ETS-R-0056-23 leave the ETS Board with the following tasks:

1. Affirm or amend the current budget processes through the recommended changes in 911-010: Expenditure Policy.
 - a. Budget requests are received through the budget process and the ETSB may approve or reject the request for a new service or equipment as a capital request.
 - b. The ETSB needs to determine whether not it will accept all allowable costs from PSAPs and other members at all outside of the budget process (unless there is an emergency).
2. Determine whether it wants to add to the core system components. If ETSB assumes the cost of the interface of an allowable cost system. Staff would recommend that if there is expansion of the 9-1-1 system’s financial obligation, that the ETSB have an out clause that obligates the Requestor to any costs should the Requestor decide to cease to use a system within the contract period if the ETSB cannot cancel the contract or execute a change order to redirect the funds. This has occurred in the past and takes up substantial ETSB staff time.

The referenced IGA is attached to this memorandum for the convenience of the reader.