

# Division of Homeland Security and Emergency Services

## Office of Information Technology Services

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### Next Generation 911 Services

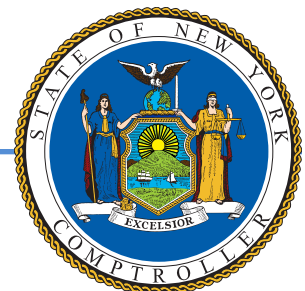
Report 2023-S-40 | June 2025

OFFICE OF THE NEW YORK STATE COMPTROLLER

Thomas P. DiNapoli, State Comptroller

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Division of State Government Accountability



# Audit Highlights

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## Objectives

To determine if the Division of Homeland Security and Emergency Services (DHSES) is effectively overseeing the development and implementation of New York State's Next Generation 911 plan, and whether the Office of Information Technology Services (ITS) has controls in place to ensure that data used by 911 systems is adequately secured and conforms with the format and standard for Next Generation 911. The audit covered the period January 2021 through December 2024, State Interoperable and Emergency Communication Board (Board) meeting minutes dating back to 2018, and the 2019 New York Statewide Communication Interoperability Plan.

## About the Program

The 911 emergency communications system dates back to the late 1960s and is built upon legacy analog infrastructure that, in many places, is still used today. As technology has evolved, so has the 911 system, first with Enhanced 911, which automatically gave a dispatcher the caller's telephone number and location, followed by Next Generation 911 (NG911), with enhanced capabilities that include voice, photos, videos, and text messages, and allow emergency calls to be rerouted to other counties' Public Safety Answering Point, or call center. More importantly, NG911 transitions to a digital internet protocol-based network, which is faster and more resilient than the original analog infrastructure. The transition to NG911 is a very complex process and involves more than just replacing hardware and software. It requires coordination among a variety of emergency communications, public safety, legislative, and governing entities. In New York State, several agencies, including DHSES, ITS, and the New York City Office of Technology and Innovation, as well as the individual counties, have a role in the transition.

DHSES is the principal agency for interoperable and emergency communications issues, including advising on 911. DHSES administers these duties through its Board and its Office of Interoperable & Emergency Communications. The Board is responsible for making recommendations regarding the development, coordination, and implementation of policies, plans, standards, and services related to interoperable and emergency communications. It also has the power to establish structures and guidelines to maintain interoperable communications planning and coordination at the statewide level.

ITS' Bureau of Geospatial Services, which oversees the Street and Address Maintenance Program (SAM Program), maintains the statewide authoritative street and address point databases that support NG911. ITS and its State, county, and local government partners continually enhance and update this information to provide dispatchers with the most accurate location information, reducing the chance of a misdirected call and the time for a call center to dispatch the appropriate first responders.

## Key Findings

- DHSES is not effectively overseeing the development and implementation of the State's transition to NG911. It has been 7 years since New York State launched the development of the State 911 Plan, and in this span of time, it has progressed no further than draft stage. Without this plan, an NG911 Strategic Plan, and an NG911 Transition Plan, the implementation of NG911 will be more challenging for counties to move forward, ultimately impeding progress toward statewide interoperable communications.

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- The success of statewide communication interoperability is dependent on counties' readiness for NG911. Twenty-two of the 36 counties (61%) that responded to our survey stated they had not received any specific guidance from DHSES or the Board regarding NG911. Further, among the 14 counties that reported receiving guidance, several also explained that it lacked detail or specifics, and they were not sure how to plan and fund for the future.
  - The prolonged implementation of NG911 increases the risk that the current, aging 911 infrastructure will not function properly, particularly during natural disasters or other large-scale emergency events, and the public will not receive vital emergency services when needed.
  - We identified weaknesses in technical controls for systems supporting the SAM Program that need to be corrected to ensure the ITS information systems, and their associated data, are not at risk. Due to their confidential nature, we disclosed these matters to ITS officials in a separate report and, consequently, do not address them in detail in this report.

## Key Recommendations

### To DHSES:

- Finalize the State 911 Plan to include NG911.
- Continually monitor counties' progress in implementing NG911 technologies to ensure they meet the goals established.

### To ITS:

- Implement the recommendations detailed in the preliminary report to strengthen technical controls over the selected systems reviewed.



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## Office of the New York State Comptroller Division of State Government Accountability

June 4, 2025

Jackie Bray  
Commissioner  
Division of Homeland Security and Emergency Services  
1220 Washington Avenue  
State Office Campus – Building 7A  
Albany, NY 12242

Dru Rai  
Chief Information Officer  
Office of Information Technology Services  
Empire State Plaza  
P.O. Box 2062  
Albany, NY 12220

Dear Commissioner Bray and Mr. Rai:

The Office of the State Comptroller is committed to helping State agencies, public authorities, and local government agencies manage their resources efficiently and effectively. By so doing, it provides accountability for the tax dollars spent to support government operations. The Comptroller oversees the fiscal affairs of State agencies, public authorities, and local government agencies, as well as their compliance with relevant statutes and their observance of good business practices. This fiscal oversight is accomplished, in part, through our audits, which identify opportunities for improving operations. Audits can also identify strategies for reducing costs and strengthening controls that are intended to safeguard assets.

Following is a report of our audit entitled *Next Generation 911 Services*. This audit was performed pursuant to the State Comptroller's authority under Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

This audit's results and recommendations are resources for you to use in effectively managing your operations and in meeting the expectations of taxpayers. If you have any questions about this report, please feel free to contact us.

Respectfully submitted,

*Division of State Government Accountability*

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# Glossary of Terms

Term	Description	Identifier
DHSES	Division of Homeland Security and Emergency Services	<i>Auditee</i>
ITS	Office of Information Technology Services	<i>Auditee</i>
Board	DHSES' State Interoperable and Emergency Communication Board	<i>Office</i>
E911	Enhanced 911	<i>Key Term</i>
ESInet	Emergency Services IP Network	<i>Key Term</i>
GIS	Geographic Information Systems	<i>Key Term</i>
Law	New York State Tax Law	<i>Law</i>
MCP	Mission Critical Partners	<i>Consultant</i>
NENA	National Emergency Number Association	<i>Standards Organization</i>
NG911	Next Generation 911	<i>Key Term</i>
NYSTEC	New York State Technology Enterprise Corporation	<i>Consultant</i>
OIEC	DHSES' Office of Interoperable & Emergency Communications	<i>Office</i>
PSAP	Public Safety Answering Point—a dedicated 24/7 call center responsible for answering 911 calls and dispatching emergency services	<i>Key Term</i>
SAM Program	ITS' Street and Address Maintenance Program	<i>Program</i>
SCIP	New York Statewide Communication Interoperability Plan	<i>Plan</i>
Surcharge	State public safety communications surcharge	<i>Key Term</i>

# Background

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The 911 emergency communications system dates back to the late 1960s and is built upon legacy analog infrastructure that, in many places, is still used today. As technology has evolved, so has the 911 system, first with Enhanced 911 (E911), which automatically gave a dispatcher the caller's telephone number and location, followed by Next Generation 911 (NG911), with enhanced capabilities that include voice, photos, videos, and text messages, and allow emergency calls to be rerouted to other counties' Public Safety Answering Point (PSAP), or call center. More importantly, NG911 transitions to a digital internet protocol-based network, which is faster and more resilient than the original analog infrastructure.

A recent example of a weather event illustrates the capability, and impact, of NG911 compared with the legacy 911 system:

In September 2024, Hurricane Helene brought historic rainfall, strong winds, and tornadoes to North Carolina, creating an enormous need for emergency services, particularly in the western part of the state. North Carolina's NG911 system ensured that 911 calls to PSAPs affected by the storm were automatically rerouted to non-impacted call centers, offering first responders and residents a reliable form of communication. According to the North Carolina 911 Board, "Had the old technology and analog technology network still been in place, the infrastructure would have been destroyed, and we would not have had the capability to reroute calls and connect people to critical emergency services."

The transition to NG911 is a very complex process and involves more than just replacing hardware and software. It requires coordination among a variety of emergency communications, public safety, legislative, and governing entities. In New York State, several agencies, including the Division of Homeland Security and Emergency Services (DHSES), the Office of Information Technology Services (ITS), and the New York City Office of Technology and Innovation, as well as the individual counties, have a role in the transition.

DHSES is the principal agency for interoperable and emergency communications issues, including advising on 911. DHSES administers these duties through its State Interoperable and Emergency Communication Board (Board) and Office of Interoperable & Emergency Communications (OIEC).

The Board is responsible for making recommendations regarding the development, coordination, and implementation of policies, plans, standards, and services related to interoperable and emergency communications. It also has the power to establish structures and guidelines to maintain interoperable communications planning and coordination at the statewide level. Accordingly, in 2019, the Board issued the New York Statewide Communication Interoperability Plan (SCIP), a strategic action plan to achieve the State's interoperable communications objectives. Among other goals, the 2019 SCIP set a target completion date of December 2022 for the State 911 Plan.

## ***Hurricane Helene September 2024***

***In the wake of Hurricane Helene, 19 PSAPs in western North Carolina impacted by the storm rerouted 911 calls to 23 partner PSAPs across the state. There were no reports of 911 calls not being delivered.***

***– North Carolina Department of Information Technology***

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Within the Board, several committees and working groups, composed of representatives from various State agencies and county and local governments, assist in planning the transition to NG911 technologies across the State. Key among them are the NG911 Working Group and the Geographic Information Systems (GIS) Working Group:

- The NG911 Working Group is charged with identifying needs, gaps, and options for the development and transition to NG911 technologies and making recommendations, including draft plans, to the Board for consideration.
- The GIS Working Group, which is coordinated by ITS' Bureau of Geospatial Services, focuses on the process for integrating county and State GIS data and ensuring this GIS data meets the requirements for the National Emergency Number Association's (NENA) i3 Standard for NG911. NENA standards enable data-rich, secure, IP-based communications from the public, through 911, to every field responder.

OIEC oversees and directs the development, coordination, and implementation of policies, plans, standards, programs, and services related to interoperable and emergency communications. Pursuant to New York Executive Law §717, OIEC also administers the Statewide Interoperable Communications Grant Program—a State-funded program for counties and New York City to facilitate their development, consolidation, and operation of public safety communications systems, including 911, E911, and NG911, supporting statewide interoperability for first responders. Counties also fund their PSAP operations through local fees and a State public safety communications surcharge (Surcharge).

ITS' Bureau of Geospatial Services, which oversees the Street and Address Maintenance Program (SAM Program), maintains the statewide authoritative street and address point databases that support NG911. ITS and its State, county, and local government partners continually enhance and update this information to provide dispatchers with the most accurate location information, reducing the chance of a misdirected call and the time for a call center to dispatch the appropriate first responders.



# Audit Findings and Recommendations

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DHSES is not effectively overseeing the development and implementation of the State's transition to NG911. For counties throughout the State to successfully begin the transition from legacy 911 and E911 systems to NG911, a statewide plan and roadmap must be completed and approved. While DHSES has emphasized the need for, and referred to, a State 911 Plan in various reports and documents, including the 2019 SCIP and with its partners in the New York State Homeland Security Strategy: 2022–2025, and referenced the enhancement of 911 services in its Strategic Plan, DHSES' efforts since 2018 to bring a State 911 Plan to fruition have been beset with numerous, lengthy delays—including the NG911 Working Group's 3-year suspension of operations due to the COVID-19 pandemic. As of January 2025, the State 911 Plan remains in draft form—more than 2 years after the Board's target completion date of December 2022, as reported in the 2019 SCIP. Notably, in the 2024 SCIP, the Board did not identify a completion date for the State 911 Plan and listed its status simply as "ongoing."

The success of statewide communication interoperability is dependent on counties' readiness for NG911. Twenty-two of the 36 counties that responded to our survey stated they had not received any specific guidance from DHSES or the Board regarding NG911. Further, among the 14 counties that reported receiving guidance, several also explained that it lacked detail or specifics, and they were not sure how to plan and fund for the future.

In addition to a lack of guidance, the counties also identified funding as a significant issue in their planning and preparations for NG911. At the State level, a portion of the Surcharge goes to the State's General Fund. In calendar years 2021 through 2023, the State collected \$763 million in this Surcharge, of which \$445 million was deposited into the statewide public safety communications account. The remainder went to the State's General Fund.

The prolonged implementation of NG911 increases the risk that the current, aging 911 infrastructure will not function properly, particularly during natural disasters or other large-scale emergency events, and the public will not receive vital emergency services when needed.

In contrast to NG911 efforts, we found that work to integrate county and State GIS data in support of NG911 has been ongoing since 2012 without delay and interruption. ITS' SAM Program, with the assistance of State, county, and local government partners, has made significant progress to ensure street and address point databases and PSAP boundaries meet NENA standards. With these advancements, the SAM Program will be ready when NG911 systems are installed and operating. We did, however, identify weaknesses in ITS' technical controls for systems supporting the SAM Program that need to be corrected to ensure its information systems and associated data are not at risk. Due to their confidential nature, we disclosed these matters to ITS officials in a separate report and do not address them in detail in this report.

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## Lack of Measurable Progress Toward NG911 Implementation

After launching the development of the State 911 Plan in 2018, DHSES did not effectively monitor progress to ensure the plan was on track to meet its December 2022 target completion date. The State 911 Plan is a vital step in the implementation of NG911 in the State. It will provide details as to how the State will implement NG911. Due to numerous delays, as of January 2025—more than 2 years beyond the target date—the plan is still in draft form. Without a final approved State 911 Plan in place, there is no assurance that actions taken by the State’s 57 counties and New York City to prepare for upgrading to NG911, including their use of limited resources, will align with the statewide solution once it is established. Especially given the widely held prediction that severe weather events are likely to increase in frequency or more intensity due to climate change, it is imperative that DHSES prioritize finalizing the State 911 Plan to include NG911, so that counties can be better prepared to assist residents during emergency events.

Our review of the Board’s meeting minutes for the period 2018–2024 identified numerous instances of protracted delays in the draft development and approval process, as shown in the timeline presented in the Exhibit at the end of this report. In the early stages of the State 911 Plan’s development, the Board consulted with the federal Department of Homeland Security and the Cybersecurity and Infrastructure Security Agency, and subsequently consulted with New York State Technology Enterprise Corporation (NYSTEC) and Mission Critical Partners (MCP), to assist with project management and writing of the State 911 Plan. Both engagements resulted in the Board revising the target completion date by a total of 15 months. As reported at the Board’s November 2019 meeting, the State 911 Plan entered the executive review process in November 2019—and the Plan has been in and out of the review process since then.

While lengthy reviews contributed to further delay, Board meeting minutes point to additional factors, most notably the NG911 Working Group’s 3-year suspension of operations due to the COVID-19 pandemic. (We note that not all Board groups followed this course of action. The GIS Working Group continued to meet and maintain steady progress in the integration of county GIS data into the State GIS databases.) The NG911 Working Group re-established itself in July 2023 and met quarterly before transitioning to monthly meetings in 2025.

In addition to a target goal for a State 911 Plan, the 2019 SCIP also established a goal for the review and redrafting of wireless and wireline 911 PSAP standards, which fell under the purview of the 911 Advisory Committee. Board meeting minutes show that the GIS Working Group’s updated 911 PSAP Standards were approved by the Board in August 2024.

Furthermore, according to minutes from the October 2024 Board meeting, the NG911 Working Group decided to pull back the draft State 911 Plan after seeing the results of a NYSTEC/MCP NG911 readiness assessment. We requested to review the

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results of the assessment; however, DHSES officials stated they would not provide them because the results had not been finalized. DHSES officials also stated that the State 911 Plan will be a living document that will evolve over time as technologies advance. Although the State 911 Plan will be a living document, DHSES must first issue an initial approved plan. DHSES has not released a final version but estimated an initial release in early 2025. As of January 2025, the State 911 Plan has not been completed.

According to DHSES officials, to fully implement NG911 statewide, additional plans must be developed to fully transition to NG911, including a NG911 Strategic Plan and a NG911 Transition Plan. The NG911 Strategic Plan is a roadmap that contains various standards, actionable goals, and deadlines. DHSES developed initial versions of the Strategic Plan in early 2021; however, as of November 2024, this plan also remains in draft. DHSES officials stated the NG911 Transition Plan will cover the period when modern systems work alongside modern legacy systems until they can be phased out. DHSES officials stated they have not started to develop the NG911 Transition Plan because they must first procure Next Generation Core Services and establish a statewide Emergency Services IP Network (ESInet). Without NG911 Strategic and Transition Plans to work from, counties may not be able to effectively prepare and use their limited resources to ensure they meet the needs of a statewide solution.

Because a statewide NG911 solution in New York hinges on several plans, two of which are still in draft and a third that isn't yet in development, it likely will be years before New York is fully transitioned to NG911. According to 2021 data compiled by the National 911 Program, which New York State participates in, 38 states have developed a statewide plan, including 14 states that either have completed the transition or are wrapping up their NG911 projects. Notably, as reported by the New York City Office of Technology and Innovation, New York City, which has the largest and most complex emergency communications system in the country—receiving approximately 9 million calls each year—is nearing completion. According to New York City officials, they have set the end of 2025 as a target goal for NG911 implementation and transition.

The significant weather event example cited in this report demonstrates the increased emergency response functionality with system adoption—North Carolina's NG911 system automatically rerouted emergency calls to non-impacted call centers, connecting people in need to critical emergency services. The prolonged implementation of NG911 statewide increases the risk of the current infrastructure not functioning properly and the public not receiving vital services in the event of an emergency.

In response to our findings, DHSES officials emphasized that the transition to NG911 is a monumental task and takes a collaborative effort to institute and formalize a transition plan from E911 to NG911. DHSES officials also highlighted actions they have taken since 2022 to move toward implementing NG911, including revising the State 911 Plan, hiring additional staff to support NG911, scheduling workshops

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and meeting with various stakeholders, and beginning to develop a Request for Proposals for the ESInet and Next Generation Core Services.

## **Support for Counties' Readiness**

The success of statewide communication interoperability is dependent on counties' readiness for NG911. We surveyed all 57 counties in the State, excluding New York City, to determine their readiness for NG911 and the challenges they face implementing NG911. Of the 36 counties that responded, 22 stated they had not received any specific guidance from DHSES or the Board regarding NG911. Further, among the 14 counties that reported receiving guidance, several also explained that it lacked detail or specifics, and they were not sure how to plan and fund for the future. Because the NG911 Strategic and Transition Plans are not available for counties to work from, without any other guidance from DHSES directing them on NG911 implementation, counties may not be able to effectively prepare and direct their limited resources appropriately to ensure their efforts will ultimately align with, and meet the needs of, the statewide solution once it is established.

In addition to a lack of guidance, the counties also identified funding as a significant issue in their planning and preparations for NG911. Counties fund their PSAP operations through local fees and surcharges in addition to grants distributed through DHSES. Annually, through OIEC, a combined \$75 million in grant funding is awarded for PSAP operations and for improvements to emergency communications and interoperability, as authorized by Section 186-f of the New York State Tax Law (Law). Although these grants aren't specific to NG911, each of them notes that counties can use them to aid in the transition to emerging technologies and NG911.

At the State level, under the Law, a portion of the Surcharge is provided to the State's General Fund. In calendar years 2021 through 2023, the State collected \$763 million in this Surcharge, with \$445 million deposited into the statewide public safety communications account. The remainder went to the State's General Fund. In response to our preliminary findings, DHSES officials emphasized that providing 911 is a local responsibility and counties are not prohibited from using additional local tax revenues to further support their 911 services. They also stated that grant funding is awarded in compliance with the Law. Nevertheless, 32 of the 36 counties stated that current funding levels, including the OIEC grants, are not sufficient to make the transition to NG911. Counties also estimated it would be several years before their PSAP would be able to fully implement NG911, dependent on New York State creating a State 911 Plan and establishing an ESInet, as well as additional funding.

## **Weakness in Technical Controls**

During our testing, we identified weaknesses in technical controls for systems supporting the SAM Program that need to be corrected to ensure ITS information systems, and their associated data, are not at risk. Due to their confidential nature, we disclosed these matters to ITS officials in a separate report and, consequently, do not address them in detail in this report. In response to our preliminary report,

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officials stated ITS has since addressed certain issues we identified and has begun to take steps to implement the remaining recommendations.

## Recommendations

### To DHSES:

1. Finalize the State 911 Plan to include NG911.
2. Continually monitor counties' progress in implementing NG911 technologies to ensure they meet the goals established.

### To ITS:

3. Implement the recommendations detailed in the preliminary report to strengthen technical controls over the selected systems reviewed.

# Audit Scope, Objectives, and Methodology

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The objectives of our audit were to determine if DHSES is effectively overseeing the development and implementation of New York State's NG911 plan, and whether ITS has controls in place to ensure that data used by 911 systems is adequately secured and conforms with the format and standard for NG911. The audit covered the period January 2021 through December 2024, Board meeting minutes dating back to 2018, and the 2019 SCIP.

To accomplish our objectives and assess related internal controls, we reviewed applicable contracts, laws, standards, policies, procedures, and documentation provided by both DHSES and ITS related to their responsibilities regarding NG911. Additionally, we reviewed meeting minutes and letters to the Legislature, grant documentation, and federal reports and surveys available online. We held interviews with officials from DHSES and ITS and met with county officials regarding NG911. We also surveyed all New York county NG911 coordinators, excluding New York City, with 36 counties responding regarding NG911.

# Statutory Requirements

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## Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. These duties could be considered management functions for purposes of evaluating organizational independence under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent performance audit of DHSES' and ITS' oversight and administration of Next Generation 911 services.

## Reporting Requirements

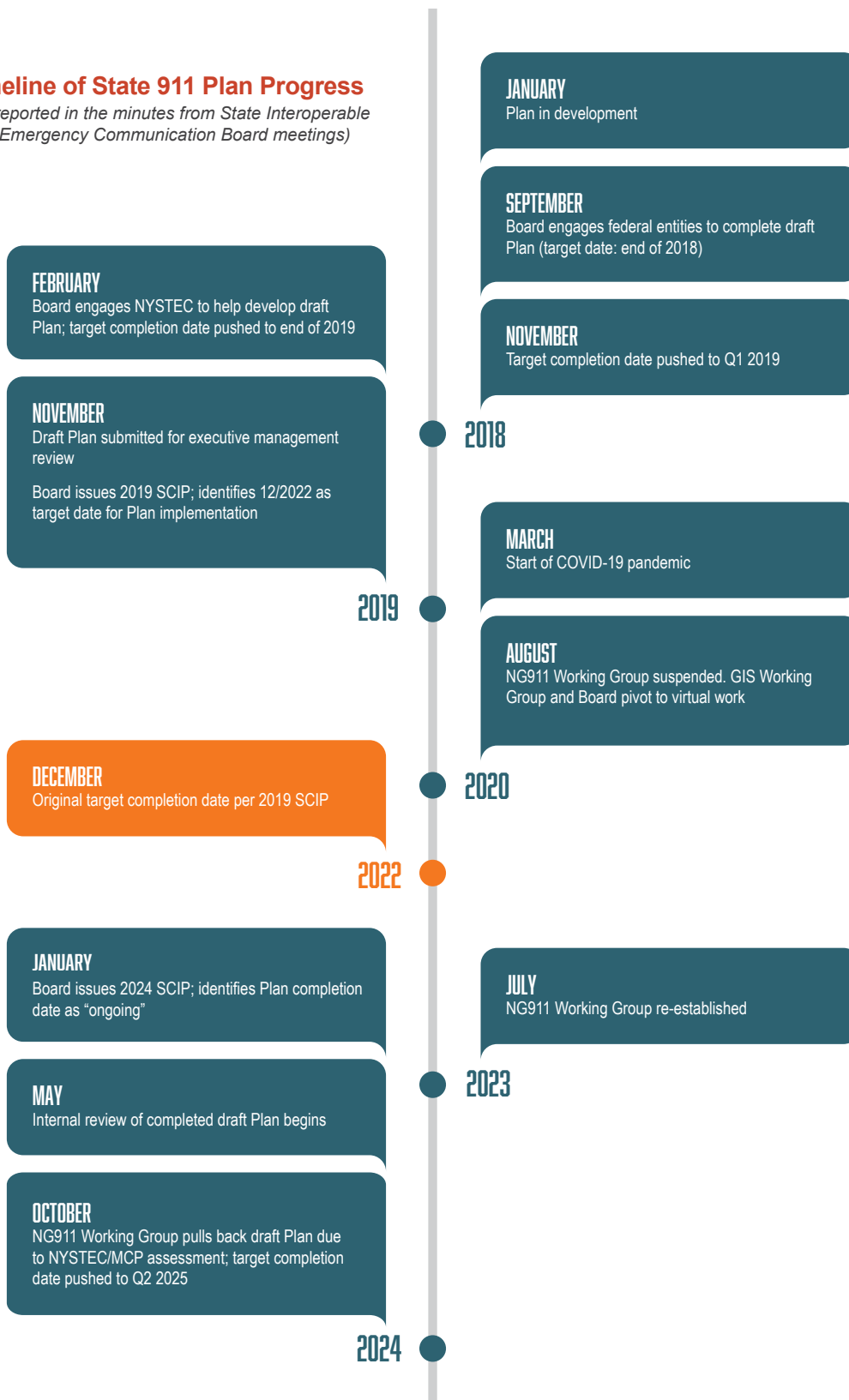
We provided a draft copy of this report to DHSES and ITS officials for their review and formal written comments. We considered both responses in preparing this final report and have included them in their entirety at the end of the report. DHSES officials agree with our recommendations but disagree with certain findings contained in our report. We have embedded State Comptroller's Comments to address the areas where they disagree. ITS officials generally agreed with our recommendations and are taking actions to implement them.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Commissioner of the Division of Homeland Security and Emergency Services and the Chief Information Officer of the Office of Information Technology Services shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendations contained herein, and where recommendations were not implemented, the reasons why.

# Exhibit

## Timeline of State 911 Plan Progress

(as reported in the minutes from State Interoperable and Emergency Communication Board meetings)





## Agency Comments - DHSES and State Comptroller's Comments

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### Homeland Security and Emergency Services

KATHY HOCHUL  
Governor

JACKIE BRAY  
Commissioner

Ms. Nadine Morrell  
Audit Director  
Office of the State Comptroller  
Division of State Government Accountability  
110 State Street – 11<sup>th</sup> Floor  
Albany, New York 12236

Dear Ms. Morrell:

Please see the attached comments from the New York State Division of Homeland Security and Emergency Services' regarding the Office of the State Comptroller's Draft Audit Report 2023-S-040 entitled "*Next Generation 911 Services.*"

Thank you for the opportunity to respond.

Sincerely,

A handwritten signature in blue ink that reads "Brian D. Jackson".

Brian D. Jackson  
Director Internal Audit

cc: Terence O'Leary

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**New York State Division of Homeland Security and Emergency Services**  
**Response to Office of the State Comptroller**  
**Draft Audit Report: Next Generation 911 Services**  
**2023-S-040**

The Division of Homeland Security and Emergency Services provides this response to key findings and recommendations contained within Draft Audit Report 2023-S-40, dated March 2025 (“Report”).

The Division generally agrees with each of the Report’s two recommendations that relate to the Division. However, for various reasons described below, the Division does not agree with the key findings bulleted out in the executive summary and expanded upon in the body of the Report. The Division does so as these recommendations are based upon a foundational misunderstanding of how 911 services are delivered in New York State and involve a matter of State law that is outside of the Division’s control.

Most notably, the Report does not discuss that in New York State, 911 services are implemented by local governments and are a part of local public safety operations. The Division’s authority is limited to providing coordination and assistance through the Office of Interoperable and Emergency Communications (OIEC). This includes the grant funding that is distributed in accordance with State law, which included funding for counties to upgrade NG911 equipment and has provided guidance on E911 and NG911 standards. However, there is no statute, rule, or regulation that has prevented counties from updating to NG911 technology, and in fact some counties have begun to do so. The publication of the State 911 Plan will help provide a road map for how the State will assist counties in connecting to other counties, however the State’s role in establishing this statewide network is all predicated upon county PSAP’s upgrading their technology in the first instance. As such, the timing of publishing the State’s plan should not be viewed as an obstacle that ever prevented a county’s ability to implement NG911 upgrades.

**State Comptroller’s Comment** – DHSES is mistaken. On page 11 of our report, we state that the success of statewide communication interoperability is dependent on counties’ readiness for NG911, thus placing responsibility on the counties. However, as the primary agency responsible for the development and implementation of the statewide NG911 system, DHSES plays a vital role. Furthermore, DHSES does not monitor counties’ readiness for NG911.

**Recommendations:**

**Recommendation #1**

*“Finalize State 911 Plan to include NG911.”*

The Division agrees with the first recommendation that the “State 911 Plan should be finalized,” and published the first iteration of the plan on April 9, 2025<sup>1</sup>. Following a pause during COVID,

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<sup>1</sup> Posted to the Division’s website, accessible at <https://www.dhSES.ny.gov/system/files/documents/2025/04/2025-0411-nys-911-plan.pdf>

<https://www.dhSES.ny.gov/system/files/documents/2025/04/2025-0411-nys-911-plan.pdf>

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and with the addition of new leadership in OIEC, work on the State Plan restarted in earnest in 2022 and is completed, following prioritized stakeholder engagement and input. The Plan is a living document that is accessible to all relevant stakeholders for feedback and shared understanding of the State's goals. At the annual Symposium that brings together all local, state and federal partners, a high-level overview was presented to the participants (41 counties present) and open communication, to include questions and answers was conducted. As county and local Public Safety Answering Points (PSAPs) begin to update their equipment and move into a Next Generation 911 [NG911] environment, this will include the State's role in helping to create an interoperable network that will connect these NG911 capable PSAPs to each other, providing additional interoperability between those various PSAP jurisdictions.

It is important to acknowledge the landscape of 911 within New York State. It is beyond dispute that 911 has always been a local responsibility in New York State. The Division is proud of the strong partnership with 911 Coordinators throughout the State, and as discussed below, it is clear that the Division and OIEC have created no conditions that prevent a county from implementing NG911. The State's role in NG911 will be to create an emergency services IP network (ESInet) and provide the supporting core services that will connect these county-based PSAPs to each other. The State has committed to this in open public discussions. The Division has also repeatedly provided guidance through grants and endorsement of particular national standards for equipment, as well as conducted outreach to the 911 community.

#### Recommendation #2

*"Continually monitor counties' progress in implementing NG911 technologies to ensure they meet the goals established."*

The Division also agrees with Recommendation 2, and through OIEC will continually monitor counties' progress in implementing the goals of the State plan, including migration to Next Generation 911 to ensure they meet the goals established. This is consistent with what OIEC has always done, when previously providing funding, technical assistance and support to county partners. OIEC will monitor counties' progress through direct technical assistance and continuing to issue grants and guidance containing NG911 standards, as authorized by law.

### **KEY FINDINGS**

#### Key Finding #1

*"DHSES is not effectively overseeing the development and implementation of the State's transition to NG911. It has been 7 years since New York State launched the development of the State 911 Plan, and in this span of time, it has progressed no further than draft stage. Without this plan, a NG911 Strategic Plan and a NG911 Transition Plan, the implementation of NG911 will be more challenging for counties to move forward, ultimately impeding progress toward statewide interoperable communications."*

The Report puts forth no specific fact demonstrating that the lack of a State plan impeded a county's progress in moving forward with NG911. That NG911 can be implemented is demonstrated by New York City's near complete migration to an NG911 system. There is no element of State law or regulation, nor action by the Division, its practices or procedures, that

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creates a barrier to an existing PSAP upgrading to NG911 technology. As described below, OIEC has shared information in the forms of grant guidance and national standards, as well as numerous public presentations and individual guidance provided to counties upon request. The funding from the Division's grants is eligible to be used for NG911 upgrades and further implementation of NG911 systems by county PSAPs.

The State Plan sets forth the role for the State to create the Statewide ESInet and supporting services that will allow NG911 PSAPs to connect to each other, but this does not shift the responsibility for implementing NG911 PSAPs from the local jurisdictions to the State. Therefore, the finding that counties were impeded from progress based upon the timing of the State Plan is an opinion that is unsupported by demonstrable facts and should be removed from this report.

**State Comptroller's Comment** – Our report focuses on DHSES' role in implementing NG911 and does not indicate that counties cannot upgrade their equipment to be NG911 capable. However, even if a county has upgraded its equipment, which some have, DHSES must take certain actions to ensure counties' NG911 equipment is compatible with the statewide NG911 solution.

According to DHSES' State 911 Plan (Plan), issued on April 9, 2025, DHSES is the primary agency responsible for the development and implementation of a statewide NG911 system. Within the Plan, DHSES recognizes the importance of the Plan and its continued development in coordinating and integrating a foundation for a statewide NG911 system. Furthermore, DHSES recognizes the need for the statewide system to interface with the NYC NG911 ESInet and Next Generation Core Services for the purposes of data sharing and facilitating 911 call transfers to and from NYC to other PSAPs in the State or neighboring jurisdictions. The completion of a statewide NG911 system relies on DHSES' direction and oversight.

#### Key Finding #2

*“The success of statewide communication interoperability is dependent on counties readiness for NG911. Twenty-two of the 36 counties (61%) that responded to our survey stated they had not received any specific guidance from DHSES or the Board regarding NG911. Further, among the 14 counties that reported receiving guidance, several also explained that it lacked detail or specifics, and they were not sure how to plan and fund for the future.”*

OSC did not provide the Division any information, including in an anonymized format, about this survey, including any content, format, or questions asked and answers provided. Because this context has not been shared, the Division's response will not be able to fully comment on the Report's use of the results of this survey, the portion cited in the Report or how those results should be interpreted.

**State Comptroller's Comment** – DHSES' comments are misleading. DHSES did not request this information—had such a request been made, we would have promptly provided the information. We issued a preliminary findings report to DHSES on January 10, 2025 detailing this finding, including how many counties received and responded to the survey and the overall findings from the survey. We also met with DHSES officials at the conclusion of our audit to discuss any outstanding concerns they had and still no request was made.

However, the Division has previously communicated with counties regarding NG911 in various

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formats. This has included multiple annual symposiums during which all county 911 coordinators are invited, at no expense to them, to meet for several days to discuss issues related to 911 and interoperability of all types of emergency communications. OIEC staff and Division Commissioners have previously made themselves available to answer questions as well, and as a result the symposium has become increasingly well-attended over the years.

During the symposium held in April 2024, the Division hosted 46 county 911 directors or their designated staff. OIEC presented to the symposium on NG911 standards, OIEC's next steps in establishing an ESInet as well as the work being done on the State Plan. Separately, the Office of Information Technology Services' GIS staff also presented on their program, and their role in NG911 planning as it pertains to GIS. Assuming the survey was administered after April of 2024 it is unclear how twenty-two of the State's 58 PSAP operators<sup>2</sup> could assert that they had not received specific guidance from the Division.

Moreover, the symposium was not the only time that OIEC has provided information or guidance on next steps for NG911 implementation. Regular updates are provided through the public and broadcasted State Interoperable and Emergency Communication Board (SIEC). During those meetings, the 911 Advisory Committee, the NG 911 Working Group and the GIS Working Group have given updates on NG911 efforts in their respective groups. OIEC has met regularly with the New York State 911 Coordinators Association, regional consortiums, and the consortium chairs too.

Staff has held quarterly meetings of the NG911 Working Group to discuss state and local progress and tasks that are needed to be completed for NG911 readiness and planning. The pace of these meetings has even been shifted to monthly as of 2025. OIEC has also met with New York City on a monthly basis to understand their implementation so that lessons learned can be shared with all other stakeholders. Finally, OIEC with local stakeholder engagement, has held multiple workshops around NG911 strategic planning to further understand local needs, requirements, questions, and prioritize the recommendations for the transition to NG911 which involves many logistical components within a large number of categories. A presentation at the 2025 Symposium discussed the workshop priorities and initiatives and a high-level overview of what is to come in the Strategic Plan.

Most importantly, beginning in 2012 through the present, OIEC has used its grants administration function to further NG911. While disbursing the funds authorized by existing law, OIEC grants have incorporated the requirements to adhere to the National Emergency Number Association (NENA) i3 standard, to aid future compatibility with NG911 systems. Moreover, permissible costs of the grant funding have included "Next Generation 9-1-1 Technologies" to allow counties to purchase compliant technology. For more than a decade, through these grants, the Division has provided standards, guidance and funding to assist PSAPs with upgrading their equipment.

The Division is proud of the outreach conducted by OIEC both directly and through our local partners and stakeholders, particularly over the past few years.

### Key Finding #3

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<sup>2</sup> New York City operates its PSAPs for all five counties, therefore it is 57 counties plus NYC.

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*“The prolonged implementation of NG911 increases the risk that the current, aging, 911 infrastructure will not function properly, particularly during natural disasters or other large-scale emergency events, and the public will not receive vital emergency services when needed.”*

As stated above, upgrading a PSAP to NG911 technology is within the authority and responsibility of local jurisdictions. The Division has not created any barrier to this transition. Moreover, the conclusion that the public “will not” receive vital emergency services fails to acknowledge that through local procedures, 911 call delivery can be rerouted to other PSAPs during times of disasters. There is local responsibility to have thorough conversations with their solution providers to account for these situations and to have procedures in place that will rectify the issues if they arise. The timing of the State Plan’s publication did not create this issue.

In fact, there is current direction within the State’s wireless PSAP Standards issued by the State Interoperable and Emergency Communication Board. These standards, going back several years and updated recently, require PSAPs to “have a written policy to handle overflow of 911 requests for service.” The standard further states that PSAPs:

*shall maintain a written continuity of operations plan (COOP) for the PSAP that provides policy, guidance, and procedures for maintaining mission critical call-taking and dispatch operations, ensures the safety of personnel, protects equipment and facilities during natural or man-made disasters or PSAP system failures, and addresses the evacuation of the original PSAP and transfer of operations to the backup site.”<sup>3</sup>*

**State Comptroller’s Comment** – Our report focuses on DHSES’ role in implementing NG911 and does not indicate that counties cannot upgrade their equipment to be NG911 capable. However, even if a county has upgraded its equipment, which some have, DHSES must take certain actions to ensure counties’ NG911 equipment is compatible with the statewide NG911 solution.

According to the Plan issued in April 2025, many PSAPs lack interoperability with neighboring jurisdictions and their counterparts across New York and bordering states. The Plan also states that DHSES recognizes the need for the statewide system to interface with the NYC NG911 ESInet and Next Generation Core Services for the purposes of data sharing and facilitating the transfer of 911 calls to and from NYC to other PSAPs in the State or neighboring jurisdictions. Without the statewide system to interface with NYC and other PSAPs, the NG911 capabilities will not be fully functional, increasing the risk that 911 infrastructure will not function properly and the public will not receive vital emergency services when needed. We recognize that PSAPs have compensating controls in place to handle mission-critical call-taking and dispatch operations to mitigate this risk, but a fully functioning statewide NG911 system would further mitigate this risk.

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<sup>3</sup> Minimum Standards Regarding Equipment, Facilities and Security for Public Safety Answering Points, 21 NYCRR § 5203.5

# Agency Comments - ITS

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## Office of Information Technology Services

**KATHY HOCHUL**  
Governor

**DRU RAI**  
NYS Chief Information Officer

Amanda L. Eveleth  
Audit Manager  
Office of the State Comptroller  
Albany, New York 12236

April 9, 2025

Dear Amanda Eveleth:

The Office of Information Technology Services ("ITS") submits the following response to the New York State Office of the State Comptroller's ("OSC") public report of the Next Generation 911 Services (2023-S-40) audit:

**1. Implement the recommendations detailed in the preliminary report to strengthen technical controls over the selected systems reviewed.**

ITS will provide updates to the confidential preliminary report recommendations and separately communicate the response to OSC.

Please feel free to contact Jerry Nestleroad at [Jerry.Nestleroad@its.ny.gov](mailto:Jerry.Nestleroad@its.ny.gov), or me at [Michele.Jones@its.ny.gov](mailto:Michele.Jones@its.ny.gov) with questions or feedback.

Sincerely,

A handwritten signature in blue ink that reads "Michele V. Jones".

Michele V. Jones, Esq.  
Chief Risk and Privacy Officer

CC: Dru Rai, Chief Information Officer  
Jennifer Lorenz, Executive Deputy Chief Information Officer  
Marcy S. Stevens, Esq., Chief General Counsel

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Empire State Plaza, P.O. Box 2062, Albany, NY 12220 | <https://its.ny.gov>

# Contributors to Report

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## Executive Team

**Andrea C. Miller** - *Executive Deputy Comptroller*

**Tina Kim** - *Deputy Comptroller*

**Stephen C. Lynch** - *Assistant Comptroller*

## Audit Team

**Nadine Morrell**, CIA, CISM - *Audit Director*

**Justin Dasenbrock**, CISA, ITIL, CC - *IT Audit Manager*

**Amanda Eveleth**, CFE - *Audit Manager*

**Christopher Bott** - *IT Audit Supervisor*

**Amos Odju** - *Information Systems Auditor*

**Cullen Spang** - *Information Systems Auditor*

**Essence Parker-Chatham** - *Graphics Editor*

**Mary McCoy** - *Supervising Editor*

## Contact Information

(518) 474-3271

[StateGovernmentAccountability@osc.ny.gov](mailto:StateGovernmentAccountability@osc.ny.gov)

Office of the New York State Comptroller

Division of State Government Accountability

110 State Street, 11th Floor

Albany, NY 12236



For more audits or information, please visit: [www.osc.state.ny.us/state-agencies/audits](http://www.osc.state.ny.us/state-agencies/audits)