

SLIGP 2.0 Grant Closeout Report				2. Award or Grant Number:	18-10-518018
				4. EIN:	35-6000158
1. Recipient Name	Indiana Integrated Public Safety Commission			6. Report Date (MM/DD/YYYY)	11/17/2021
3. Street Address	100 N. Senate Ave., Room N825			7. Reporting Period End Date: (MM/DD/YYYY)	03/31/2021
5. City, State, Zip Code	Indianapolis, Indiana 46204-2213			8. Final Report	
				Yes <input checked="" type="checkbox"/>	
				No <input type="checkbox"/>	
9. Project/Grant Period				10. Reserved for Reviewer	
9a. Start Date: (MM/DD/YYYY)	03/01/2018	9b. End Date: (MM/DD/YYYY)	03/31/2021		
11. Program Activities					
11a. Identify the activities you performed during SLIGP2.0 grant period of performance					
	Activity Type (Planning, Governance Meetings, etc.)	Was this Activity Performed during the grant period? (Yes/No)	Total Project Deliverable Quantity (Number)	Description of Activity Deliverable Quantity	
1	Governance Meetings	Yes	24	Cumulative number of governance, subcommittee, or working group meetings related to the NPSBN held during the grant period	
2	Individuals Sent to Broadband Conferences	Yes	7	Cumulative number of individuals sent to national or regional third-party conferences with a focus or training track related to the NPSBN using SLIGP 2.0 grant funds during the grant period	
3	Convened Stakeholder Events	Yes	7	Cumulative number of events coordinated or held using SLIGP 2.0 grant funds during the grant period, as requested by FirstNet.	
4	Staff Hired (Full-Time Equivalent)(FTE)	Yes	1.5	Cumulative number of state/territory personnel FTEs who began supporting SLIGP 2.0 activities during the grant period (may be a decimal).	
5	Contracts Executed	Yes	1	Cumulative number of contracts executed during the grant period.	
6	Subrecipient Agreements Executed	No	0	Cumulative number of agreements executed during the grant period.	
7	Data Sharing Policies/Agreements Developed	Yes		Yes or No if data sharing policies and/or agreements were developed during the grant period.	
8	Further Identification of Potential Public Safety Users	Yes		Yes or No if further identification of potential public safety users occurred during the grant period.	
9	Plans for Emergency Communications Technology Transitions	Yes		Yes or No if plans for future emergency communications technology transitions occurred during the grant period.	
10	Identified and Planned to Transition PS Apps & Databases	No		Yes or No if public safety applications or databases within the State or territory were identified and transition plans were developed during the grant period	
11	Identify Ongoing Coverage Gaps	No		Yes or No if participated in identifying ongoing coverage gaps using SLIGP 2.0 funds during the grant period.	
12	Data Collection Activities	No		Yes or No if participated in data collection activities as requested by FirstNet	

11b. Please provide a description of each activity reported in response to Question 11; any challenges or obstacles encountered and mitigation strategies you employed; and any additional project milestones or information.

11.1 Governance Meetings . The Integrated Public Safety Commission (IPSC) is comprised of twelve (12) members from a broad base of public safety and private industry. Membership includes a sheriff, a chief of police, a fire chief, an emergency medical services provider, a mayor, a county commissioner, a representative of campus law enforcement, a representative of the private sector, the superintendent of the state police department, the special agent in charge of the Indiana FBI office, a member of the Indiana House of Representatives, and a member of the Indiana Senate. Local governance is strengthened through the Statewide Interoperability Executive Committee (SIEC). The SIEC is composed of a member from each of the ten Indiana Department of Homeland Security (IDHS) Districts who, in turn, serves as a member of their District Communications Working Group. The SIEC also has representative members from state agencies, Indiana National Guard, Red Cross, local Public Safety Answering Point (PSAPs), County Emergency Manager Agencies, Amateur Radio. The SIEC is the formal advisory committee to the Integrated Public Safety Commission. 24 governance meetings were held during the grant period of performance (22 were reported in Q1-Q12 PPRs, 2 additional meetings were held in March, 2021) . FirstNet Authority staff and Indiana FirstNet/AT&T staff attended meetings. FirstNet/broadband updates and activity details were provided at all meetings.

11.2 Individuals Sent to Broadband Conferences – 7 individuals attended broadband conferences , to include PSCR Public Safety Broadband Stakeholder Meetings and the National Governors Association Enhancing Public Safety Communications Governance Workshop.

11.3 Convened Stakeholder Events – As requested by FirstNet, six regional workshops were held around the State of Indiana in August, 2019. The purpose of the regional workshops was to bring Indiana first responders and other stakeholders together to discuss data sharing policies and agreements and to facilitate the integration of the FirstNet network and data interoperability into plans, policies, strategies and programs. As requested by FirstNet, a Public Safety Communications Conference was held at the Indianapolis Motor Speedway in on September 13, 2019. The purpose was to enhance awareness and mobilize effective commitment and actions by bringing together policy makers, first responders and other stakeholders with the aim of effectively integrating the FirstNet network and data interoperability into the development of policies, strategies and programs across Indiana. Hundreds of stakeholders attended these events.

11.4 Staff Hired - Portions of staff services were used to perform SLIGP 2.0 activities and to provide for ongoing coordination with NTIA and implementation of grant funds.

11.5 Contracts Executed - One contract was executed for project management and program support.

11.7 Data Sharing Policies/Agreements Developed - Indiana's approved SLIGP 2.0 budget included activities to develop data sharing policies and agreements. All work on these important projects was halted, however, due to the desk review process. Indiana continues to strongly believe that all activities charged to the grant were allowable and allocable as set forth in the SLIGP 2.0 Notice of Funding Opportunity, as detailed in our approved grant application, and as reported during quarterly status calls with grant administrators.

11.8 Further Identification of Potential Public Safety Users - Indiana continued to assist local agencies with their questions on FirstNet/AT&T and directed them to the proper contacts. This led to multiple meetings between FirstNet/AT&T and potential public safety users.

11.9 Plans for Emergency Communications Technology Transitions - Indiana's approved SLIGP 2.0 budget included activities to plan for Emergency Communications Technology Transitions. Significant work on these important projects was halted, however, due to the desk review process. Indiana continues to strongly believe that all activities charged to the grant were allowable and allocable as set forth in the SLIGP 2.0 Notice of Funding Opportunity, as detailed in our approved grant application, and as reported during quarterly status calls with grant administrators.

11c. Did you perform activities during the last quarter of the grant that haven't been reported previously (i.e., new programmatic activities, staffing changes)? If so, please describe.

Yes. Indiana halted most SLIGP 2.0 planned programmatic activities after Q8 due to the desk review process. However, regular quarterly governance meetings and weekly status/strategy meetings with FirstNet AT&T continued in Q13, and significant staff time was spent responding to the NTIA/NIST desk review. Additionally, staff spent time after the last quarter (post March 31, 2021) on grant management, to include NTIA/NIST response and grant closeout activities. All documented expenses were limited to the preparation of final progress, financial, and project audit requirements. IPSC's Controller, Jane Ryderson, left state employment on March 19, 2021. IPSC's new Controller, Kerry Kelley, began work on May 24, 2021. Kelley assisted with grant management to include review of financial documentation, desk review items, and closeout preparation.

11d. Please share any lessons learned or best practices that your organization implemented during your SLIGP 2.0 project.

Indiana implemented many processes and activities that have become best practice across the country. In the words of the FirstNet Authority, Indiana's "Indiana could only be characterized as a model state in all aspects of our interaction. They have eagerly embraced our mission, have been active in working with both the PSA team and AT&T staff to plan activities and have in all ways been supportive in the Indiana public safety community to promote the purposes and goals of FirstNet."

Total Funds Allocated to Contracts **\$574,872.00** **\$0.00**

14. Budget Worksheet

Columns 2, 3 and 4 must match your project budget for the entire award and your final SF 424A. Columns 5, 6, and 7 should list your final budget figures, cumulative through the last quarter

Project Budget Element (1)	Federal Funds Awarded (2)	Approved Matching Funds (3)	Total Budget (4)	Final Federal Funds Expended (5)	Final Approved Matching Funds Expended (6)	Final Total Funds Expended (7)
a. Personnel Salaries	\$0.00	\$134,615.00	\$134,615.00	\$17,589.98	\$49,507.19	\$67,097.17
b. Personnel Fringe Benefits	\$0.00	\$40,385.00	\$40,385.00	\$7,538.56	\$19,524.62	\$27,063.18
c. Travel	\$85,050.00	\$0.00	\$85,050.00	\$5,621.08	\$0.00	\$5,621.08
d. Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
e. Materials/Supplies	\$16,878.00	\$0.00	\$16,878.00	\$6,579.44	\$0.00	\$6,579.44
f. Contractual	\$574,872.00	\$0.00	\$574,872.00	\$238,798.18	\$0.00	\$238,798.18
g. Other	\$23,200.00	\$0.00	\$23,200.00	\$0.00	\$0.00	\$0.00
h. Indirect	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
i. Total Costs	\$700,000.00	\$175,000.00	\$875,000.00	\$276,127.24	\$69,031.81	\$345,159.05
j. Proportionality Percent	80.00%	20.00%	100%	80.00%	20.00%	100%

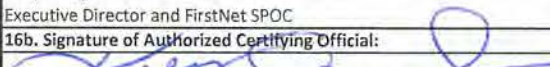
15. Additional Questions: Read each statement below. Rate your level of agreement or disagreement with each statement and answer follow-up questions to provide additional information.

Statement	Agree/Disagree	Additional Questions	Response
15a. SLIGP 2.0 funds were helpful in planning for the integration with the NPSBN.	1-Strongly Disagree	What was most helpful? What challenges did you encounter?	<p>IPSC is a small agency, but we oversee huge statewide communications systems/programs for nearly 3000 local state and federal public safety agencies in Indiana. We applied for SLIGP 2.0 funds because we believed it would give us the ability to hire contractors to help us plan for the integration of broadband technology into our existing communication ecosystem. IPSC's contractor, Crowe LLP, performed extensive grant management and project planning for SLIGP 2.0. All contractor charges were incurred directly and specifically for SLIGP 2.0 and adhered to the NOFO and to the detailed work plan as submitted and approved by NTIA.</p> <p>IPSC submitted a strong and detailed SLIGP 2.0 application. The application was granted, and IPSC executed the approved plan. Activities were discussed quarterly with grant administrators. Indiana submitted quarterly financial and progress reports, which were accepted and approved by NTIA/NIST. NTIA/NIST did not convey any concerns with Indiana's progress or activities before September 20, 2019, when they initiated a "desk review." This process grew into a two-year ordeal that ultimately cost the agency significant dollars, and, worse, significant staff time. Staff was forced to spend hundreds of hours justifying, rejustifying, providing documents, meeting, explaining, and responding to frequently changing and ill-defined terms. Important projects that could have led to significant progress stopped cold.</p> <p>NTIA/NIST typically took 5 months to reply to IPSC's submissions, but, in return, demanded responses and/or repayment from IPSC in 15 days. Despite unequivocal support from the FirstNet Authority and other stakeholders and elected</p>

<p>15b. I plan to continue any SLIGP 2.0 program activities beyond the SLIGP 2.0 period of performance.</p>	<p>2-Disagree</p>	<p>What do you plan to accomplish after the period of performance?</p>	<p>All SLIGP 2.0 programmatic activities, other than administrative costs associated with grant management and staff time spent meeting with FirstNet/AT&T, came to a hard stop after the desk review conference call was held in September, 2019.</p> <p>Our partnership with the Indiana FirstNet/AT&T team, and the support we receive from the FirstNet Authority is inextricably woven into the communications ecosystem here in Indiana. We plan to continue to work in partnership and collaborate with our first responders to ensure public safety broadband is integrated into response and mitigation.</p>
<p>15c. SLIGP 2.0 funds were helpful in informing my stakeholders about FirstNet.</p>	<p>1-Strongly Disagree</p>	<p>What was most helpful? What challenges did you encounter?</p>	<p>Indiana held regional and statewide conferences. Our stakeholder events energized public safety about the direction of communication technology. All stakeholder events were requested, in writing, by FirstNet. Agendas and programs were developed in conjunction with FirstNet and were attended by FirstNet.</p> <p>NTIA/NIST grant program officers initially determined that a large portion of our regional workshops were unallowable. One stated reason was because the acronym "NPSBN" or the word "FirstNet" did not appear in the agenda. IPSC was forced to spend a huge amount of time justifying, rejustifying and explaining that planning for FirstNet necessarily included discussions about current status and use. This position was endorsed in a letter of support from FirstNet Director of Field Operations to NTIA/NIST: "The format was designed to have the IPSC staff to present from a very local, Indiana perspective and we, the Authority and AT&T staff, verbally initiate discussions during those sessions to tie the local discussions to broadband topics. In this format, we were able to stop the dialogue at any point and say, "How could that process be improved by broadband?", "What keeps you from doing that communications over [an app, email, text, etc.]?", "Would it improve the incident response if you could share that information with everyone in the incident simultaneously?" and so forth. The answers to these types of questions are vitally important to our FirstNet roadmap. But additionally, by not going in with a pre-formatted FirstNet slide deck, the audience is more likely to have a local discussion and our questions help them to consider innovations to their process without feeling that they are being "sold" a product or program."</p> <p>Despite this, and many other strong arguments of support from stakeholders and leaders who are deeply familiar with Indiana's grant activities, NTIA/NIST continued to apply what appeared to be unequal and undefined standards to the allowability of costs.</p>
<p>Statement</p>	<p>Agree/Disagree</p>	<p>Additional Questions</p>	<p>Response</p>

<p>15d. SLIGP 2.0 funds were helpful in maintaining a governance structure for broadband in my state/territory.</p>	<p>1-Strongly Disagree</p>	<p>What was most helpful? What challenges did you encounter?</p>	<p>The SLIGP 2.0 NOFO specifically calls out “Existing governance body to provide input to the single officer and to contribute towards planning activities to further identify potential public safety users of the NPSBN and prepare for data sharing” as an allowable activity. Our contractor and staff attended these meetings, helped prepare presentations, took notes, and used the information reported to identify issues and gaps that could be resolved by the NPSBN/FirstNet.</p> <p>During the desk review, NTIA/NIST Federal Program Officers did a line-by-line review of thousands of pages of documents to include meeting minutes and agenda, and assigned a percentage based on the number of times “NPSBN” or “FirstNet” appeared. They then applied this percentage as the basis for labeling costs as unallowable.</p> <p>Attending partial meetings would not allow our contractors and staff to identify problems and gap discussed by attendees that we would be able to resolve with FirstNet. Example: At a Statewide Interoperability Executive Committee (SIEC) meeting, a representative reported they were planning an air show and had some land mobile radio coverage issues in the area. This was captured in the notes and reviewed later during IPSC’s weekly meeting with FirstNet/AT&T. It was determined Band 14 coverage was excellent in the area, so we followed up with the SIEC member with information about how incorporating FirstNet devices/Band 14 into their plan would enhance their communication capabilities. As a result, this agency transitioned to FirstNet and is integrating broadband technology into their everyday communication use.</p> <p>Due to NTIA/NIST’s retroactive and arbitrary allocation of allowability, Indiana was forced to repay contractor costs and staff time associated with this meeting)and other meetings and activities). NTIA/NIST’s insistence on using the number of times “FirstNet” or “NPSBN” were written as the basis for allowability shows an alarming unfamiliarity with how public safety communications plans are made. Planning for new technology cannot occur in a vacuum. Without context, words</p>
<p>15e. SLIGP 2.0 funds provided resources that were helpful in preparing for FirstNet planning activities in my state/territory (e.g. staffing, attending broadband conferences, participating in training, procuring contract support etc.).</p>	<p>1-Strongly Disagree</p>	<p>What was most helpful? What challenges did you encounter?</p>	<p>Prior to the desk review, IPSC used SLIGP 2.0 grant funds to send 3 individuals to Public Safety Communications Research (PSCR) conferences and 4 individuals to the National Governor’s Association Workshop on Enhancing Public Safety Communications Governance.</p> <p>The bulk of Indiana’s SLIGP 2.0 application consisted of contractor costs. NTIA retroactively disallowed a large portion of the costs - even though they had been outlined in detail in the submitted and approved grant application, claiming that the activities were “operational” in nature.</p> <p>Planning for new technology cannot occur in a vacuum. Without context, words such as “NPSBN”and “FirstNet” are meaningless to first responders. True strategic plans must be built with knowledge of and discussion about current systems, policies and procedures. This is precisely how IPSC built our stakeholder events, to energize public safety about the direction of communication technology.</p>

<p>15f. Overall, SLIGP 2.0 funds were helpful in preparing for FirstNet.</p>	<p>1-Strongly Disagree</p>	<p>What was most helpful? What challenges did you encounter?</p>	<p>SLIGP 2.0 ended up COSTING the Integrated Public Safety Commission/State of Indiana.</p> <p>Throughout the 2-year, onerous "desk review" process. Indiana received conflicting and incomplete messages from NTIA/NIST grant officers. Actual comments from NTIA/NIST grant officers include:</p> <ul style="list-style-type: none"> ** "We acknowledge the NOFO is not perfect" ** "The NOFO is not well written and is unclear" and is "open for interpretation". ** "Just because the FirstNet Authority requested and participated in events doesn't mean it is allowable." ** "We know we are splitting hairs." <p>NTIA/NIST asserted both verbally and in writing that certain Indiana SLIGP 2.0 activities were unallowable based on their supposition that said activities were "operational" in nature. IPSC at no time used SLIGP 2.0 grant funds to develop technical specifications or specific operational plans. IPSC requested either a written definition of "operational planning" from NTIA/NIST or specific references to unallowable operational planning in the NOFO or other grant documents to corroborate claims that certain planning activities were unallowable. IPSC did not receive a response to this request.</p> <p>IPSC continues to strongly believe that all activities charged to the grant were allowable and allocable as set forth in the SLIGP 2.0 Notice of Funding Opportunity, as detailed in our approved grant application, and as reported during quarterly status calls with grant administrators. IPSC's position is supported by the FirstNet Authority, as detailed in the March 24, 2020, email from Lesia Dickson, FirstNet Director – Field Operations North Region, and during numerous conversations held during the 2 year desk review process.</p>
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<p>16a. Typed or printed name and title of Authorized Certifying Official: Kelly S. Dignin Executive Director and FirstNet SPOC</p>	<p>16c. Telephone:</p>	<p>317.234.1540</p>
<p>16b. Signature of Authorized Certifying Official:</p> 	<p>16d. Email Address:</p>	<p>kdignin@ipsc.in.gov</p>
	<p>16e. Date:</p>	<p>11/17/2021</p>

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