



Law Enforcement Technology Shared Services

Information Technology Services • 128 E. Buffalo Street • Ithaca, NY 14850 • (607)274-5417 • Fax (607)274-5420

Shared Data Systems Policy and Procedures

December 2012

This manual is intended both to provide guidance and serve as a reference to users of all data generated, accessed, transmitted or stored on systems and networks managed or hosted by Tompkins County. It is the responsibility of each user to comply with the policies and procedures set forth within this publication.

It is understood that Public Safety is dynamic, and that it is impossible to anticipate every circumstance that may confront a user. In situations that are not addressed within these policies, users are expected to respond and act in a way that ultimately reflects Tompkins County, and/or their respective agency's, mission statement and priorities.

Policies and procedures exist to maintain high levels of professional conduct, data integrity and overall Public Safety. Therefore, conduct that deviates from these written standards will first be reviewed to determine if the situation required a deviation from stated policy, and will then be reviewed to determine whether the actions taken were appropriate, given the actual situation. Finally, the policies written for system(s) transmitted or stored on systems and networks managed or hosted by Tompkins County are only a part of the direction provided to users. Communication that is directive in nature from individual agency supervisory or management personnel has the same authority as any written policy.



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Public Safety Shared Data Systems

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POLICY/PROCEDURE #: PS12-01	TITLE: Data Classification, Access, and Dissemination
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-02 Enforcement and Sanction Inter-Agency Sensitive Data Classification Form Agency-Shared Sensitive Data Classification Form Agency-Only Sensitive Data Classification Form PS Policy 12-01 Data Entry Standards – Spillman Systems Public Safety Shared Data Systems Access, Management and Dissemination Request Form
MODIFIED DATE:	

Objective:

The purpose of this policy is to define the appropriate categories of data and guidelines for the management, access and dissemination of each in compliance with Tompkins County, LETSS, and local, state, and federal governmental procedures and regulations regarding privacy and confidentiality of locally maintained Public Safety data.

Policy Statement:

All LETSS members are responsible for protecting the confidentiality, integrity, and availability of data generated, accessed, modified, transmitted, stored, or used by LETSS. Data will be protected, irrespective of the originating agency or data owner, the medium on which the data resides, and regardless of format.

General Information:

This data classification policy is applicable to all data generated, accessed, transmitted or stored on systems and networks managed or hosted by Tompkins County. For the purpose of defining management policies, the following data categories are established: Inter-Agency Sensitive Data, Agency-Shared Sensitive Data and Agency-Only Sensitive Data.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

FOIL – Freedom of Information Law

Inter-Agency Sensitive Data Classification Form – Form that summarizes data contained within this data category.

Agency-Shared Sensitive Data Classification Form - Form that summarizes data contained within this data category.

Agency-Only Sensitive Data Classification Form - Form that summarizes data contained within this data category.

Data Owner – Individual or agency responsible for approving access to, modification and/or dissemination of, data.

Data Custodian – Individual or agency responsible for maintaining Tompkins County hosted systems, hardware, software and applications which support LETSS services. For the purposes of this policy, Tompkins County ITS is considered the data custodian. Exclusions include data from systems managed by Tompkins County Department of Emergency Response (i.e. Motorola Radio, Personal Emergency Response Systems[PERS]/Digitize Alarm, and 911 Phone Systems)

Data Categories:

Inter-Agency Sensitive Data: - Information that is intended for collaborative use and may be accessed, managed and/or modified by all Public Safety agencies with access to systems supported by the Data Custodian. To promote the most efficient use of the systems, data within this category shall be approved by the Tompkins County Department of Emergency Response. In addition, the guidelines for the collective management of data within this category shall be defined under Policy PS Policy 12-01 “Data Entry Standards – Spillman Systems”.

Agency-Shared Sensitive Data: – Data Owner information defined and protected by LETSS policies and procedures, agency defined restrictions, or local, State or Federal statutes and regulations. The inappropriate disclosure of Agency-Shared Sensitive Data by anyone other than the Data Owner without adhering to procedures defined within PS policy 12-01 “Data Classification, Access and Dissemination”, is not allowed and may result in consequences as defined within LETSS policy 12-02 “Enforcement and Sanction”, or potential litigation.

Agency-Only Sensitive Data: – Information explicitly defined and protected by individual LETSS agencies. The inappropriate disclosure of Agency-Only Sensitive Data by anyone other than the Data Owner without adhering to procedures defined within PS policy 12-01 “Data Classification, Access and Dissemination”, is not allowed and may result in consequences as defined within LETSS policy 12-02 “Enforcement and Sanction”, or potential litigation.

Procedure:

Data Classification Procedures

Due to the complexities and progression of shared data and systems managed by the Data Custodian, LETSS and Public Safety agencies shall be responsible for the documentation of data classified under each of the three Data Categories described in the Definitions section of this Policy (PS 12-01). Not all classification requests may be

feasible due to technical and/or process limitations within shared systems hosted by the Data Custodian. The procedures under which data is classified shall be as follows:

1. Inter-Agency Sensitive Data

- The Data Custodian will document and present to the Tompkins County Director of Emergency Response, a summary of the data contained within this category through the use of the Inter-Agency Sensitive Data Classification Form.
- A review and recommendation of the Inter-Agency Sensitive Data Classification Form will be completed by LETSS and any other agencies or governmental bodies as determined by the Tompkins County Director of Emergency Response. Any recommended changes resulting from the review process will be documented and submitted to the Tompkins County Director of Emergency Response.
- The Tompkins County Director of Emergency Response will have the authority to approve the final version of the Inter-Agency Sensitive Data Classification Form.
- Any subsequent request for changes to data categorized within Inter-Agency Sensitive Data shall be submitted in writing to the Tompkins County Director of Emergency Response.

2. Agency-Shared Sensitive Data

- LETSS will document a summary of the data contained within this category through the use of the Agency-Shared Sensitive Data Classification Form.
- A review and recommendation of the Agency-Shared Sensitive Data Classification Form will be completed by LETSS. Any recommended changes resulting from the review process will be documented through LETSS.
- LETSS will have the authority to approve the final version of the Agency-Shared Sensitive Data Classification Form.
- Any subsequent request resulting in changes to data categorized within the approved Agency-Shared Sensitive Data Form shall be submitted for review by LETSS.

3. Agency-Only Sensitive Data

- Individual LETSS agencies will document their data contained within this category through the use of the Agency-Only Sensitive Data Classification Form. Classification of data within this category can only be submitted by the Data Owner.
- Data Owners will have the authority to approve the final version of the Agency-Shared Sensitive Data Classification Form.
- Any subsequent request resulting in changes to data categorized within the approved Agency-Shared Sensitive Data Form shall be submitted to the Data Custodian for implementation.

Data Access Procedures

At Data Owner's request, Data Custodian shall be responsible for assigning technical privileges to access data owned by requesting Data Owner. Due to the complexities and progression of shared data and systems managed by the Data Custodian, not all access requests may be feasible due to technical and/or process limitations. The procedures under which access is determined shall be as follows:

1. Inter-Agency Sensitive Data

- To promote the most efficient use of the systems, access to and/or management of data within this category shall be granted to standard Spillman users accounts unless otherwise defined in writing by LETSS. Requests made by non-LETSS agencies or individuals for access and/or management

to data within this category must be defined, reviewed and approved by LETSS.

2. Agency-Shared Sensitive Data

- Access to, and management of, data within this category shall be granted by the Data Owner, via written request to the Data Custodian.

3. Agency-Only Sensitive Data

- Access to, and management of, data within this category shall be granted by the Data Owner, via written request to the Data Custodian.

Data Dissemination Procedures

1. Inter-Agency Sensitive Data

- Dissemination of data within this category is granted to LETSS agencies unless otherwise defined in writing by LETSS.
- Dissemination of data within this category by non-LETSS agencies or individuals must be defined, reviewed and approved by LETSS through the use of the Public Safety Shared Data Systems Access, Management and Dissemination Request Form.

2. Agency-Shared Sensitive Data

- No data shall be disseminated by any other person, entity or agency without written permission from the Data Owner.

3. Agency-Only Sensitive Data

- No data shall be disseminated by any other person, entity or agency without written permission from the Data Owner.
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Public Safety Shared Data Systems

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	TITLE: Inter-Agency Sensitive Data Classifications
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-03 Data Classification, Access and Dissemination PS Policy 12-01 Data Entry Standards – Spillman Systems

Inter-Agency Sensitive Data Classifications Within The Spillman System(s):

GIS MANAGED DATA
PREMISE
NAMES
VEHICLES
ADDRESSES
ALERTS



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	TITLE: Agency-Shared Sensitive Data Classifications
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-03 Data Classification, Access and Dissemination

Agency-Shared Sensitive Data Classifications Within The Spillman System(s):

DATA OWNER: DOER

NATURE
AGENCY CALL COMMENTS
RESPONDING UNITS
PROCESSING TIMES RELATED TO CAD CALLS
CAD CALLER INFORMATION

DATA OWNER: INDIVIDUAL AGENCY

INCIDENTS
AGENCY CALL COMMENTS
AGENCY UNIT TIMES
WANTS/WARRANTS
LICENSES/PERMITS
RESPONDING UNIT TIMES / STATUSES



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	TITLE: Agency-Only Sensitive Data Classifications
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-03 Data Classification, Access and Dissemination

Agency-Only Sensitive Data Classifications Within The Spillman System(s):

AGENCY PARTITIONED DATA
SYSTEM LOGS (includes, but not limited to AVL, Radio, etc)
MESSAGING / IM
PERSONNEL



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POLICY/PROCEDURE #: PS 12-02	TITLE: Data Entry Standards – Spillman Systems
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES:
MODIFIED DATE:	Tompkins County Public Safety Shared Data Systems – Spillman Data Entry Standards

Objective:

The purpose of this policy is for the Data Custodian to define the appropriate standards for information entered into the Spillman Shared Data System system.

Policy Statement:

All agencies entering data into the Spillman Shared Data System are responsible for protecting the integrity of data entered into Spillman.

General Information:

Data Management is the process governing the definition and structure of information entered into an application. This policy applies to all agencies that enter data into Spillman, including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, elected officials and temporary workers.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

Data Custodian – Individual or agency responsible for maintaining Tompkins County hosted systems, hardware, software and applications which support LETSS services. For the purposes of this policy, Tompkins County ITS is considered the data custodian. Exclusions include data from systems managed by Tompkins County Department of Emergency Response (i.e. Motorola Radio, Personal Emergency Response Systems[PERS]/Digitize Alarm, and 911 Phone Systems)

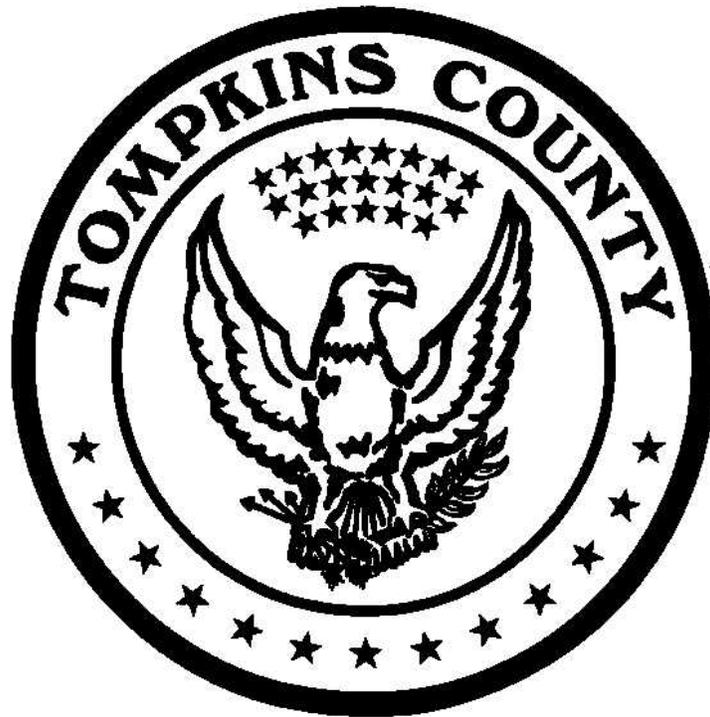
Procedure:

Due to the various agencies entering data into the Spillman system, standards must be defined by the Data Custodian in compliance with Tompkins County, LETSS, and local,

state, and federal governmental procedures and regulations regarding the structure and integrity of locally maintained Spillman data.

1. The Data Custodian will define and document the standards for entering data into Spillman for Names, Alias, Business and Premise through the use of the Tompkins County Public Safety Shared Data Systems – Spillman Data Entry Standards document.

Tompkins County Public Safety Shared Data Systems



Spillman Data Entry Standards

Modified 10/2012

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1. **Name and Address Entry**
 - Requirements of Users
 - Name Entry Standard
 - Alias Name Entry Standard
 - Business Name Entry Standard
 - Address Entry Standard
 - General Geo Base Information

Name and Address Entry:

User Requirements for name entry:

It is the duty of each user to determine if the name of the person being entered in the system may already exist by making a *thorough search* of the Names Table. All personnel shall follow the standardized name and address entry procedures.

Name Entry Standard:

1. **Full legal name**, if known, shall be used at all times. Abbreviated versions or nicknames should be listed as an **alias** to the real name in the Names Table. All personnel should ask for a full legal name.

Examples:

If, "**Ronald Allen Jones**" is a full legal name then the full name should be entered into the names table as **Ronald Allen Jones** as shown:

Correct Entry:



A screenshot of a name entry form. The fields are filled as follows: Name Number: 300; Last: JONES; Fst: RONALD; Mid: ALLEN; Addr: (empty); City: (empty); ST: (empty); Zip: (empty); Deceased: / /; Alias For: (empty).

It would be inappropriate to use Ron instead of Ronald, even if that is his preferred name.

Incorrect Entry:

Legal first name is Ronald, not Ron.



A screenshot of a name entry form, identical to the correct entry form, but with the Fst field containing 'RON' instead of 'RONALD'. An arrow points from the text above to the 'RON' field. A mouse cursor is over the City field, which has a tooltip that says 'Street address'.

If, "Ronald Allen Jones" uses the middle name of ALLEN as a first name and goes by Allen Jones then, Ronald Allen Jones should still be entered into the names table as the legal name.

Incorrect Entry:

His real first name is Ronald, not Allen

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

Allen should be here in the middle name.

A name record should be created using the "Ronald Allen Jones" and making an additional name record of Allen Jones as an alias to the record with the full legal name.

See ENTRY OF ALIAS NAMES.

- UPPER/lower Case.** All names may be entered in upper case or a mixture of upper and lower case letters. As the record is saved the **system will force the name into all upper case letters.**

Correct Entry:

Mixed case entry is acceptable.

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

Also Correct Entry:

All upper case entry is acceptable.

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

- Name suffixes** (Jr, Sr, and III) shall **not** be entered in the last name field. This information will be entered in the suffix name field which is located directly after the middle name

field. (NOTE: When accessing fields, the cursor advances as follows: Last, First, Mid, and then to the suffix field.)

Incorrect Entry:

Neither the period is acceptable, nor does suffix titles go here.

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

The suffix title goes in this field

Correct Entry:

Correct location for suffix title.

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

Also correct, no periods or other characters in the name fields.

- Titles** such as Doctor, Professor, Officer, Deputy, etc., shall not be entered in a name field. The suffix field may be used for titles such as MD, PhD, Off, Dep, etc. Periods and other keyboards characters shall not be used.

If the individual has both a professional title and a name title such as Jr, III etc. The name title should be used and the professional title should be listed in the comments line.

Correct Entry:

This is the proper location for titles.

Name Number:

Last: Fst: Mid:

Addr:

City: ST: Zip:

Deceased: Alias For:

- Punctuation and special characters* shall **not** be used in any of the name fields. **Except for hyphens (Smith-Jones).** No other characters are permitted.

This includes periods, commas, quotations, apostrophes, asterisks, pound signs, etc.

Incorrect Entry:

No apostrophes in the name field.

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'Jones's', with an arrow pointing to the apostrophe. The 'Fst' field contains 'Ronald'. The 'Mid' field contains 'Allen' and a 'PhD' button. Other fields include 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For'.

Also Incorrect Entry:

No keyboard characters including a period.

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'Jones'. The 'Fst' field contains 'Ronald'. The 'Mid' field contains 'A.', with an arrow pointing to the period. Other fields include 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For'.

- Names with Apostrophes should be entered with **no apostrophe and no space between the letters**. The name should be entered as a single word.

Names with apostrophes will be entered without the apostrophe (OBrien, ONeil, etc. should be used instead of O'Brian, or O'Neil)

Incorrect Entry:

No apostrophes in the name field.

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'O'Neil', with an arrow pointing to the apostrophe. The 'Fst' field contains 'Patty'. The 'Mid' field contains 'Marie'. Other fields include 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For'.

Correct Entry:

No apostrophe and no space.

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'ONeil', with an arrow pointing to the 'N'. The 'Fst' field contains 'Patty'. The 'Mid' field contains 'Marie'. Other fields include 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For'.

7. Multiple surnames such as Smith-Jones shall be entered with the hyphen in place. The hyphen **shall** be placed between the two last names.

For example Smith-Jones

Incorrect Entry:

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'Smith Jones' with a space between the words. The 'Fst' field contains 'Marilyn'. The 'Mid' field is empty. Below these are fields for 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For', all of which are empty or contain placeholder characters like slashes. An arrow points from the text below to the space between 'Smith' and 'Jones' in the 'Last' field.

The name should have a hyphen in between Smith and Jones.

Correct Entry:

A screenshot of a name entry form, identical in layout to the previous one. The 'Last' field now contains 'Smith-Jones' with a hyphen between the words. An arrow points from the text below to the hyphen in the 'Last' field.

Hyphen in place is correct.

8. Compound names shall be entered without spaces, for example: De La Rosa shall be entered as DeLaRosa, St. Marie shall be entered as StMarie, Mc Donald as McDonald, Van Hooser as VanHooser, etc. Again characters such as the period in St. Marie shall not be used.

Correct Entry:

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' field contains 'StMarie' without spaces. The 'Fst' field contains 'Chandra'. The 'Mid' field contains 'Jeneal'. Below these are fields for 'Addr', 'City', 'ST', 'Zip', 'Deceased', and 'Alias For', all of which are empty or contain placeholder characters like slashes. A mouse cursor is visible over the 'Last' field.

9. *Modifying Name Records* is an ability any user in the system can do. IF you find a name record that needs to be altered or corrected, and you are sure the record is referring to the same person you are working with you may alter the record so that it is correct.

The system does maintain a record of who changed the record. If you change a name record you should document in the comments section why you changed what you did.

For Example: you are changing or correcting a DOB in your name record.

Correct Entry:

The screenshot shows a name record form with the following fields:

- Name Number: 300
- Last: Jones, Fst: Ronald, Mid: Allen, III
- Addr: 95 EAST CENTER, City: Orem, ST: UT, Zip: 84042
- Deceased: / /, Alias For: [empty]
- Personal Identification: DL Numbr: [empty], DL State: [empty], Class: [empty], Name Typ: INDIV, Image: [empty], SSN: 528-88-8888, Local ID: [empty], Home Tel: (801) 229-7166, State ID: [empty], Work Tel: (801) 229-7211, FBI Number: [empty]
- Physical Description: DOB: 12/12/80, 0 yrs, Eyes: BRO Brown, Glasses: N No Glasses/, Sex: M Male, Hair: BLU Blue, Height: 6'00", 0 cm, Hstyle: CRLN Curly, Long, Weight: 210 lbs, 0 kg, Beard: F Full Beard
- Traits: SMT: [empty]
- MO: [empty]
- Alert Codes: [empty]
- Comments: **DOB changed to 12/12/80, verified by D.L. / provided false DOB at time of arrest**
- Premis: [empty], Xtra: [empty], Visited Inmates: [empty], Had Visitors: [empty], Merge: [empty], Editor

Document why you changed the field data.

Take the old that you are changing, copy it to the comment and then document why you changed the field – then correct the field in the form. Also notice the above record is incomplete. The record change is verified by D.L. data but no drivers license has been entered into the identification fields.

The address field of the names field will contain the LOCAL address. When you do a drivers license scan, however, it will put that address into the address field. When this happens, modify the names screen to make the address match their local address and then save the scan into the previous address field.

Alias Name Entry Standard:

1. A separate alias name record shall be created in the Names Table for any name other than the person's legal name that would likely not be found when utilizing the standard search method. Prior to adding the alias record, a name search shall be conducted on the alias name to ensure that it has not already been entered.
2. The alias name record should contain **data only** in the name, DOB, SSN and the "alias for" fields.
3. An alias should be created when the entry person can unequivocally state that the name in question refers to the same individual. *If there is any doubt, the alias link should not be created.*

Business Name Entry Standard

1. *Business names shall be entered in the last name field only. For example Circle K would be entered as LAST NAME: Circle K*

The Name Type field should also be changed to Business.

For Example:

Correct Entry:

Business name entered only in the last name field.

A screenshot of a data entry form with a green header bar. The form contains several fields: Name Number (300), Last (Circle K), Fst, Mid, Addr, City, ST, Zip, Deceased, Alias For, Personal Identification, DL Numbr, Name Typ (BUSIN), and SSN. A black arrow points from the text above to the 'Last' field, which contains 'Circle K'. Another black arrow points from the text below to the 'Name Typ' field, which contains 'BUSIN'.

Business type entered in the name type field.

Incorrect Entry:

Not correct because name is not all in the last name field.

A screenshot of a data entry form with a green header bar. The form contains several fields: Name Number (300), Last (K), Fst (Circle), Mid, Addr, City, ST, Zip, Deceased, Alias For, Personal Identification, DL Numbr, Name Typ (BUSIN), and SSN. A black arrow points from the text above to the 'Last' field, which contains 'K'. Another black arrow points from the text below to the 'Name Typ' field, which contains 'BUSIN'. A blue box highlights the 'City' field, which contains 'Geobase address ID'.

Name type is entered correct:

Incorrect Entry:

Name is correct.

Name type is not correct.

A screenshot of a data entry form with a green header bar. The form contains several fields: Name Number (300), Last (Circle K), Fst, Mid, Addr, City, ST, Zip, Deceased, Alias For, Personal Identification, DL Numbr, Name Typ (INDIV), and SSN. A black arrow points from the text above to the 'Last' field, which contains 'Circle K'. Another black arrow points from the text below to the 'Name Typ' field, which contains 'INDIV'.

2. *The word "The" shall be eliminated at the start of the business name. For example "The House of Fun" would be entered as only "House of Fun" in the Last Name Field.*

For Example:

Incorrect Entry:

"The" is not permitted at start of title.

A screenshot of a name entry form. The 'Name Number' field contains '300'. The 'Last' name field contains 'The House of Fun', with an arrow pointing to the word 'The'. The 'Fst' field is empty. The 'Mid' field contains two empty boxes. Below the name fields are fields for 'Addr', 'City', 'ST', 'Zip', 'Deceased' (with slashes), and 'Alias For'. The 'Personal Identification' section includes 'DL Numbr', 'Name Typ' (set to 'BUSIN'), and 'SSN' (with dashes).

Name type is correct.

Correct Entry:

Business name is correct without "the" in the title.

A screenshot of a name entry form, identical in layout to the previous one. The 'Name Number' field contains '300'. The 'Last' name field contains 'House of Fun', with an arrow pointing to the word 'House'. The 'Fst' field is empty. The 'Mid' field contains two empty boxes. Below the name fields are fields for 'Addr', 'City', 'ST', 'Zip', 'Deceased' (with slashes), and 'Alias For'. The 'Personal Identification' section includes 'DL Numbr', 'Name Typ' (set to 'BUSIN'), and 'SSN' (with dashes).

Name type is correct.

3. The ampersand (&) **shall not** be used to replace the "and" in business name.
4. Business names that are numbers shall be entered as numbers. For example "7-11". Remember that Hyphens are the only characters allowed besides letters.
5. Doctors, Dentists and Attorney's (the businesses, not the individuals) will be entered completely in the last name field as follows:

For Example: Mark H Leopold DDS
Gary R Donath MD

Incorrect Entry:

This is a business not an individual, the entry should be completely in the last name field.

A screenshot of a name entry form. The 'Name Number' field is empty. The 'Last' name field contains 'Leopold', the 'Fst' field contains 'Mark', and the 'Mid' field contains 'H'. There is a separate field to the right of the 'Mid' field containing 'DDS'. Arrows point from the 'Name Number' field to each of these four fields. Below the name fields are fields for 'Addr', 'City', 'ST', 'Zip', 'Deceased' (with slashes), and 'Alias For'. The 'Personal Identification' section includes 'DL Numbr', 'Name Typ' (set to 'BUSIN'), and 'SSN' (with dashes).

The name type entry is correct.

These names should not have any periods, or other characters. The only non letter characters permitted in the name fields are hyphens.

Name type field is correct.

A screenshot of a form with a green header bar. The form contains the following fields: Name Number: 300; Last: Dr. Mark H. Leopold DDS; Fst: ; Mid: ; Addr: ; City: ; ST: ; Zip: ; Deceased: //; Alias For: ; Personal Identification: DL Numbr: ; Name Typ: BUSIN; SSN: - -. Two arrows point from the text above to the 'Last' field and the 'Name Typ' field.

Both the Doctor, period and period after the middle initial are incorrect entries.

Correct Entry:

Name type is correct.

A screenshot of a form with a green header bar. The form contains the following fields: Name Number: 301; Last: Mark H Leopold DDS; Fst: ; Mid: ; Addr: ; City: ; ST: ; Zip: ; Deceased: //; Alias For: ; Personal Identification: DL Numbr: ; Name Typ: BUSIN; SSN: - -. Two arrows point from the text above to the 'Last' field and the 'Name Typ' field.

Business name is correct with no keyboard characters. Remember hypens are permitted but do not apply to this business name.

Address Entry Standard:

1. All addresses with apartment, suite, or space numbers shall be entered as follows:

For Example: 123 S MAIN ST;123

Incorrect Entry:

No space after the semicolon.

Name Number:

Last: Fst: Mid:

Addr: Prev:

City: ST: Zip:

Deceased: Alias For:

Personal Identification

DL Numbr: Name Typ: SSN:

The word apartment, suite or space should not be used.

Correct Entry:

Address entry is correct.

Name Number:

Last: Fst: Mid:

Addr: Prev:

City: ST: Zip:

Deceased: Alias For:

Personal Identification

DL Numbr: Name Typ: SSN:

Address has been geo verified.

If the apartment has a building number associated with it the building should be listed after the apartment number.

For Example: 123 S MAIN ST#123 building 17

Name Number:

Last: Fst: Mid:

Addr: Prev:

City: ST: Zip:

Deceased: Alias For:

Personal Identification

DL Numbr: Name Typ: SSN:

After the apt, space, or suite additional information may be added if necessary.

2. All addresses with 1/2 as part of the number will be entered as follows: 1042 Walnut#1/2 .

For Example: 123 S MAIN ST#1/2

Correct Entry:



Name Number:

Last: Fst: Mid:

Addr: Prev:

City: ST: Zip:

Deceased: Alias For:

Personal Identification

DL Numbr: Name Typ: SSN:

Proper entry for addresses with 1/2 addresses.

- All addresses **will** be verified by the Geobase. Spillman will pop up with a possible matching address. Press the F2 key to make sure you have the complete list. Then highlight and accept the address.

Addresses must be in the geobase in order to display on the maps.

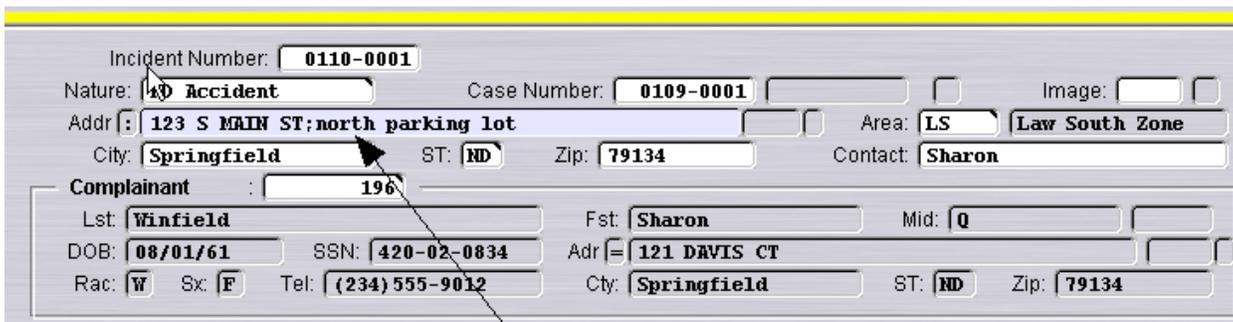
All those addresses not in the Geobase will then automatically enter a quote mark (:) in front of the address. This means that the address cannot be verified in the Geobase.

For those addresses that you know are not within the City limits, type a semicolon (;) in front of the address and it will accept the address.

It is expected that all addresses will be geo-verified. If the address can not be verified the user should notify one of the system administrators to resolve the issue with that address. Each agency may keep a log and submit the log if they desire. The addresses may be temporarily entered into the DBDAKA table and will be used by the system until the next geobase upload from County GIS systems.

- Post Office boxes will be entered as follows:
;PO Box 1328
- City parking lots will be entered as follows:
With the address followed by a ";" and an identifier of the parking lot.

For example: a city parking lot at a city park at 123 S Main should be entered as:
123 N Main;north parking lot or some other descriptor or identifier.



Incident Number:

Nature: Case Number: Image:

Addr: Area:

City: ST: Zip: Contact:

Complainant:

Lst: Fst: Mid:

DOB: SSN: Adr:

Rac: Sx: Tel: Cty: ST: Zip:

Descriptor is permitted if not an apartment, space, or suite.



Law Enforcement Technology Shared Services

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POLICY/PROCEDURE #: LETSS12-01	TITLE: Adoption and Modification of Law Enforcement Technology Shared Services Policy and Procedures
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012
MODIFIED DATE:	

Objective:

To create a process for establishing new policy and procedures; modifying existing policy and procedures; and periodically reviewing and updating policies and procedures associated with the duties, powers and responsibilities defined by the Bylaws and Inter-Municipal Agreement for the Law Enforcement Technology Shared Services (LETSS) group as approved, and originally granted authority by, the Tompkins County Resolution #R248-08.

Policy Statement:

It is the policy of LETSS to have a manual of policies and administrative procedures that govern the shared responsibilities of technology systems and related data, and to have a process for keeping the LETSS Policy Manual up to date.

General Information:

LETSS is responsible for coordinating and tracking additions or revisions to the LETSS Policy Manual according to the steps outlined in the procedures section below. These steps have been established to ensure that introduced policies and procedures are initiated, reviewed or updated and implemented, based on the following criteria:

1. The need for a new policy and/or procedure has been identified;
2. A change in federal, state, or local law or requirements has affected existing policy/procedure;
3. A change due to labor contract negotiations or personnel management has affected existing policy/procedure;
4. The policy/procedure has not been reviewed within the past year. (Refer to the "next scheduled review date" included in the heading of the policy/procedure description.)
5. The policy/procedure in question no longer reflects actual practice, or inadequately addresses changed conditions. Any member of LETSS can initiate requests for additions, updates, or modifications to the LETSS Policy Manual at any point in time. However, all requests must be submitted via the LETSS Policy Manual Change Request Form and submitted to the LETSS Administrative Support Staff for processing and tracking. LETSS approval is required for new policies/procedures or modifications to existing policies/procedures to ensure consistency and accuracy.

6. Approval of new, or the modification of previously adopted LETSS Policy and Procedures, shall follow the voting procedures as established in the LETSS By Laws.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

Requesting Member - LETSS Member agency initiating the new or modified LETSS Policy.

Administrative Support Staff - The department or division within the County organizational structure responsible for assisting in preparation, and dissemination of, new or updated LETSS policies or procedures, and for routinely reviewing adopted policies or procedures associated with LETSS.

LETSS Policy Manual Change Request Form – To be completed by Requesting Member and forwarded to LETSS Administrative Support Staff for process and tracking.

LETSS Policy Manual Impact Review Form - To be completed by LETSS Member(s) and forwarded to LETSS Administrative Support Staff for process and tracking.

Procedure:

LETSS approval is required for new policies or for modifications to existing policy. The following steps are required for introducing new policy or for updating/revising existing policy:

Step 1. The LETSS Requesting Member completes a LETSS Policy Manual Change Request Form and submits the suggested modification to the LETSS Administrative Support Staff for processing and tracking.

Step 2. The LETSS Administrative Support Staff will forward the proposed new or revised policy to all LETSS members for review. Members will review and submit recommended changes or comments, via the LETSS Policy Impact Review Form, to the LETSS Administrative Support Staff for tracking and dissemination. Members will have 15 days from date of dissemination to submit the LETSS Policy Impact Review Form to LETSS Administrative Support Staff.

Step 3. The LETSS Administrative Support Staff will prepare a verbatim summary of all recommendations and comments received and will forward the summary to the Requesting Member. The Requesting Member shall be responsible for the preparation of the final draft based on recommended modifications.

Step 4. The Requesting Member will forward the new or revised policy and any supporting documentation to the LETSS Administrative Support Staff for inclusion on the next LETSS monthly agenda.

Note: If the new or revised policy is not approved, Steps 2-4, or a combination of these, may be repeated until either the policy is approved or tabled for consideration at a later date.

Step 5. LETSS Administrative Support Staff will track all results, notify all LETSS members, and make the final changes to the LETSS Policy Manual.

Step 6. Once adopted, LETSS Member agencies will be individually responsible for the dissemination, communication, training and enforcement process(es) necessary to implement the new or modified LETSS policy within their own agency by the effective date as defined in the policy header.



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POLICY/PROCEDURE #:	TITLE:
REQUESTOR:	
CHANGE REQUEST DATE:	REFERENCES:
MODIFIED DATE:	

CHANGE REQUEST FORM

COMPLETE A FORM FOR EACH TYPE OF REQUEST

Type of Request (select all that apply):

- New policy
 New procedure
 Revision to existing policy
 Revision to existing procedure

Description of Change Request (Sections I and II must be completed):

<p>Section I: Briefly Explain the Recommended Change: (Identify sections and paragraphs if changing existing policy or procedure)</p>
<p>Section II: Explain the reason for the suggested text</p>
<p>General Comments: (Optional):</p>



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POLICY IMPACT REVIEW FORM

Section I: How will this new policy impact your work or operation?

Section II: What new or revised language are you recommending?

Section III: What impact will this new/revised policy or procedure have on other existing policy or procedure?

Section IV: General Comments or Questions: *(Optional)*:



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POLICY/PROCEDURE #: LETSS 12-02	TITLE: Enforcement and Sanction
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012
MODIFIED DATE:	

Objective:

It is the responsibility of each LETSS agency to ensure all members of its workforce comply with the policies formally adopted by LETSS by applying remedial measures and sanctions appropriate for the breach of policy.

Policy Statement:

Each LETSS agency will define and implement appropriate actions for any violation of LETSS policy or procedure. In addition, each LETSS agency agrees to uphold specific sanctions when defined by individual LETSS policy.

LETSS will immediately investigate any security incidents or violations and mitigate, to the greatest extent possible, any negative effects that may result from the incident.

LETSS agencies will not intimidate or retaliate against any other LETSS agency or individual that reports an incident.

General Information:

This policy applies to all LETSS agencies including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, elected officials and temporary workers.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

Procedure:

Failure to comply with adopted LETSS Policies will be brought to review at the next scheduled LETSS meeting. Any compliance failure that includes a possible security incidents or violation will result in immediate suspension of the involved user(s) privileges by County IT until review by LETSS.



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POLICY/PROCEDURE #: LETSS11-01	TITLE: Assigning Officers To Units Within the Spillman System
EFFECTIVE DATE: 2/15/2011 00:00	
NEXT SCHEDULED REVIEW:	REFERENCES:
MODIFIED DATE:	

Objective:

The purpose of this policy is to define the procedures to establish a process for Law Enforcement to put themselves "on-duty" and to take themselves "off-duty" within the Spillman system.

Policy Statement:

It shall be the responsibility of each LETSS member agency to ensure its individual members are assigned to a unit and put "on-duty" at the start of each shift, and that each individual is properly taken "off-duty" at the end of each shift.

General Information: N/A

Definitions: N/A

Procedure:

It shall be the choice of each LETSS agency to determine whom in the agency shall be responsible for these functions, and for completion of these processes at the start of each shift.

"On-Duty" –

Step One – Use the UPDUO command to assign an officer to a unit in Spillman (not Mobile). In the event that an officer is sent to a call at the start of a shift, and the assignment to a unit has not been completed, dispatch will assist when requested via radio. These should be the exception to the rule.

Step Two – Log into Spillman Mobile with the proper assigned unit.

Once assigned to an unit via UPDUO in Spillman, the officer will then log into Spillman Mobile with the proper assigned unit noted in the area labeled "Unit:" on the Spillman Mobile log-in screen.

Step Three – Set the initial status as ONDT.

NOTE: In the event that the appropriately assigned shift unit is not showing ONDT and available for dispatch in CAD, then the call will be dispatched via radio, and noted by dispatch with a call comment entry of "radio", time permitting.

“Off-Duty” –

Set the end of shift status as OFFDT.

Note: In the event that the officer is unable to set the end of shift status as OFFDT, then the officer will communicate with dispatch via radio and request their unit's status be changed to OFFDT.

The dispatcher will attempt to communicate with any remaining units with an active status from the previous shift to determine current status. If radio communication is not successful, dispatch will attempt to notify the agency supervisor.

Approved

CITY OF ITHACA

by _____
LETSS Member

date _____

VILLAGE OF CAYUGA HEIGHTS

by _____
LETSS Member

date _____

VILLAGE OF DRYDEN

by _____
LETSS Member

date _____

VILLAGE OF GROTON

by _____
LETSS Member

date _____

VILLAGE OF TRUMANSBURG

by _____
LETSS Member

date _____

TOMPKINS COUNTY

by _____
LETSS Member Sheriff

date _____

by _____
LETSS Member Information Technology

date _____

by _____
LETSS Member District Attorney

date _____

by _____
LETSS Member Emergency Response

date _____



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POLICY/PROCEDURE #: LETSS 12-03	TITLE: Spillman Mobile Status Changes
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-02 Enforcement and Sanction
MODIFIED DATE:	

Objective: With officer safety as the overriding goal, the purpose of this policy is to establish the method for officers to update their current Status in Mobile and communicate with dispatch

Policy Statement: It shall be the responsibility of each LETSS member agency to ensure its individual members update their Status in Mobile themselves when possible and practical. To take advantage of new technologies, law enforcement officers need to evolve, allowing for both verbal and non verbal methods of communication. Both methods are acceptable in certain appropriate situations, with officer safety as the predominant factor of consideration.

General Information: N/A

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

Spillman Mobile - Mobile client which allows two way data communications with the Spillman data server and Spillman CAD.

Spillman Mobile Status(es) – Spillman designated abbreviations for LEO status(es). Examples include, but are not limited to: ONDT (on-duty), ENRT(enroute to scene), ARRVD(arrived on scene), BUSY(not available)

LEA - Law Enforcement Agency

LEO - Law Enforcement Officer

MDT – Mobile Data Terminal

Procedure:

1. Officers will, whenever practical and safe, use the MDT and verbal communication to update their status in the following low priority, non-emergency mode situations.
 - i. After the initial sign on to the MDT system, verbal communication is permitted for officers to report they are out of their vehicle, i.e., meal, meeting, walk-through, etc.
 - ii. When the nature of the incident denotes the assignment of a single officer.
 - iii. When the communication from Dispatch is via the MDT and is non-verbal only.
 - iv. When the officer can do so in a safe manner.
 2. Even in low priority situations officers will always use verbal communication in addition to MDT.
 3. In the following high priority, emergency mode situations, officers/dispatch may use the MDT when it is reasonable to do so, however, it is not required.
 - i. Emergency calls where immediate officer response is required for the preservation of life or property.
 - ii. In emergency situations, Officers must radio "Acknowledge", radio "En Route", radio "On the Scene", and radio "Clear the Scene"
 - iii. In emergency situations, assigned units may choose to update their status on the MDT. The expectation on high priority, emergency mode calls is that Officers will use the radio, and the MDT whenever practical and safe: *Do the best you can.*
 - iv. In emergency situations, Dispatch shall have the options to:
 1. initiate radio log entries,
 2. enter call comments, or
 3. manually change the status of the responding units.
 4. This policy will be in force when the hardware is operating properly. Because of the impairment to officer safety caused when operating without a MDT, all member agencies are encouraged to adopt policies for officers to switch cars out when an MDT is not functioning properly.
-



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POLICY/PROCEDURE #: LETSS 12-04	TITLE: ReOpening CAD Calls – Spillman System
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-02 Enforcement and Sanction
MODIFIED DATE:	

Objective:

The purpose of this policy is to define the criteria and procedures for reopening CAD calls within the Spillman system.

Policy Statement:

For data integrity, and to promote officer safety, CAD calls should only be “re-opened” in certain circumstances. In instances where an officer is onsite or out of their vehicle for a follow-up, for officer safety, communicating via MDT and radio to alert Dispatch to your status, and then creating a supplemental report to your existing incident should suffice.

General Information:

To preserve the integrity of incident data, and to promote officer safety, CAD calls must follow a defined set of criteria to be reopened.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

LEA – Law Enforcement Agency.

On-Duty – An active duty status within the Spillman System.

MDT– Mobile Data Terminal.

Procedure:

- When a LEO requests that a CAD call be reopened by a Dispatcher, it shall be the responsibility of that Dispatcher to forward the request to the on-duty Dispatch Supervisor.
- The Dispatch Supervisor shall reopen the call if the following criteria are met:
 1. The responsible Spillman Unit must still be on-duty.
 2. The request must be within 8 hours of the received time of the CAD call.
 3. The Dispatch Supervisor must enter a call comment into the reopened CAD call with the following information:
 - a. Requestor name.
 - b. Reason or explanation for reopening call.

If the request to reopen the CAD call exceeds the 8 hour criteria, the CAD call may be reopened at the discretion of the Dispatch Supervisor.



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POLICY/PROCEDURE #: LETSS 12-05	TITLE: Messaging, Instant Message and Alerts - Spillman System
EFFECTIVE DATE: 01/01/2013 00:00	
NEXT SCHEDULED REVIEW: 04/01/2013, 10/01/2013	REFERENCES: Tompkins County Resolution #R248-08 LETSS By Laws, Adopted 7/8/2009 LETSS Agreement, Adopted 7/7/2009, modified 2/13/2012 LETSS policy 12-02 Enforcement and Sanction
MODIFIED DATE:	

Objective:

The purpose of this policy is to define the appropriate use of, and procedures for, using Messaging, Instant Messaging and Alerts within the Spillman system.

Policy Statement:

To preserve the integrity of incident data, and to promote officer safety, use of Spillman Messaging, Instant Messaging and Alerts must adhere to a defined set of criteria and procedures. All Spillman Messaging, Instant Message and Alerts communications are logged. Data Owners have the ability and right to view Spillman Messaging, Instant Message and Alert logs. Use of Spillman Messaging, Instant Message and Alerts is a privilege, not a right. As such, each agency can revoke the privilege at any time and for any reason – either at the user or agency level. Abuse of the privilege may result in appropriate disciplinary action as determined by each LETSS agency.

General Information: The real-time nature of Spillman Instant Messaging, Messaging and Alerts allows for a faster and more efficient means of getting answers and transferring information than e-mail or telephone. These communication methods provide a direct mode of communication with agencies and co-workers within Tompkins County's Public Safety community, allowing employees to be more efficient in their work output.

Definitions:

Policy - A statement of intention to guide political, management, financial, or administrative decisions and achieve rational outcome(s). LETSS approval is required for new policies or modifications to existing policies.

Procedure - A prescribed and documented set of steps, actions, or activities generally needed to obtain consistent results as documented within a defined and approved LETSS policy.

Spillman Messaging – Secure Messaging, self contained within the Spillman systems, similar to e-mail.

Spillman Instant Message - Secure Instant Messaging, self contained within the Spillman systems.

Spillman Alert - Secure Alerts, self contained within the Spillman systems.

Data Owner – Individual or agency responsible for approving access to, modification and/or dissemination of, data.

Data Custodian – Individual or agency responsible for maintaining Tompkins County hosted systems, hardware, software and applications which support LETSS services. For the purposes of this policy, Tompkins County ITS is considered the data custodian. Exclusions include data from systems managed by Tompkins County Department of Emergency Response (i.e. Motorola Radio, Personal Emergency Response Systems[PERS]/Digitize Alarm, and 911 Phone Systems)

Procedure:

- Any call for service must be dispatched via CAD. Spillman Messaging and Instant Messaging must not be used in lieu of CAD call comments or CAD incident creation, Data entry standards for CAD call comments or CAD incident creation shall be defined by Tompkins County Department of Emergency Response.
- No user shall have any expectation of privacy regarding any communications via Spillman Messaging, Instant Messaging and Alerts. As such, all Spillman Messaging, Instant Messaging and Alert messages shall be treated as business records that will be retained and may be used as evidence in litigation, audits, and investigations.
- Professional and appropriate language must be used in all Spillman Messaging, Instant Messaging and Alert messages. Spillman users are prohibited from sending abusive, harassing, threatening, menacing, discriminatory, pornographic, disrespectful, or otherwise offensive messages.
- Requests for access to messaging logs from a Data Owner must be submitted in writing to the Data Custodian. In the event a message log/data access request involves an employee from another agency, the Data Owner must notify the LETSS representative from the involved agency.

Spillman Messaging

- Spillman Messaging is intended to act as a secure, internal messaging system, similar to e-mail. Examples of proper Messaging communications include, but are not limited to:
 - Any individual, agency or system wide message that needs to be communicated and/or received beyond the time that the user is logged into the system.
 - Any informational/non-emergency communication.

Spillman Instant Messaging

- Spillman Instant Messaging is intended for INFORMAL, non-CAD/incident related communications. Examples of proper IM communications include, but are not limited to name and number information.

Spillman Alerts

- Spillman Alerts are a dispatcher function. Request for Alerts shall follow these steps:
 1. LEO or LEA shall request an alert through a Dispatcher.
 2. Dispatcher will forward the request to their Shift Supervisor.
 3. Dispatch Shift Supervisor shall approve the type (BOLO, ATL or INFO), content and expiration time for the alert.
 4. Once approved, the alert shall be issued by the Dispatcher or Dispatch Shift Supervisor, at the discretion of the Supervisor.