

Response to the Economic Impact Analysis
from the Virginia Department of Planning and Budget

Related to 6 VAC 20-60- Rules Relating to Compulsory Minimum Training Standards for Dispatchers, Department of Criminal Justice Services, May 23, 2000

Summary

It is noted in the summary and basis statements in the proposed regulatory package that the increase in hours of minimum training needed by dispatchers is based on a job task analysis for that position. The purpose of a job task analysis is to connect the work of a job to the training needed by person who will do the job in a legally defensible manner. A job task analysis identifies what the person does on the job currently using information provided by incumbents performing the job. Training requirements are directed to those tasks and developed with the assistance of an advisory committee of professionals and subject matter experts. The position of dispatcher had never before been analyzed, and the current minimum standards being used to train dispatchers were determined to be inadequate for the work that is done now. The economic impact analysis does not mention this study.

Estimated Economic Impact

The responsibility of the Department of Criminal Justice Services is to promulgate the training standards for several positions involved in public safety for the citizens of the Commonwealth. There are two issues of law that are directly impacted by training standards. These are negligent training and failure to train. Minimum standards must be reviewed and amended from time-to-time in order to provide the public an assurance of a minimum level of competency in public safety positions because of the changes in law, philosophy of enforcement, technology, and citizen concerns. Further, review and amendment is necessary to ensure that current needs are being met.

Because costs related to increasing the hours of training for dispatchers differ from locality to locality, the department does not have this information available to it. As noted in the proposed regulatory package, increasing the hours of training will have some fiscal impact. Also noted is the availability of funds that are provided to regional criminal justice academies (over \$2.6 million annually) for training public safety personnel, and the funds available to localities collected from 9-1-1 wireline and wireless taxes that may also be used to support training of competent dispatchers. The economic impact analysis does not mention this.

Additionally, localities annually receive state aid to localities money that is allocated based upon a formula. To be eligible for the funds, a locality must provide 24 hour law enforcement services and train its personnel. \$183,700,000 was originally discussed in the 2000 session of the General Assembly. In FY 2000, \$165,757,000 was allocated.

This money does not include funds provided by the Compensation Board to Sheriff's Offices for operation.

Conclusion

It is recognized that an economic impact analysis focuses on a specific area of proposed regulatory activity. The Department appreciates the opportunity to respond.