



**Economic Impact Analysis
Virginia Department of Planning and Budget**

6 VAC 20-270 – Regulations Relating to Campus Security Officers
Department of Criminal Justice Services
December 22, 2011

Summary of the Proposed Amendments to Regulation

Pursuant to Chapters 203 and 233 of the 2006 Acts of the Assembly, The Board of Criminal Justice Services (Board) promulgated emergency regulations for certification of campus security officers. The Board now proposes these regulations as a permanent replacement for the emergency regulations that will expire January 31, 2012. These proposed regulations set initial training standards for campus security officers that are hired by colleges and that are contracted through private security firms as well as setting rules for biennial recertification. These proposed regulations also set rules of conduct for and rules for suspension of certification. In order to become certified, the Board proposes to require campus security officers to:

- Be US citizens or resident aliens legally able to work,
- Have a high school or general equivalency diploma and be at least 18 years of age,
- Undergo a criminal background check,
- Have a valid driver's license if driving will be part of their job,
- Successfully complete some sort of first aid training as determined by their employing college,
- Complete a specific online course that is provided by Federal Emergency Management Agency (FEMA) and
- Complete 16 hours of initial training in specific modules as determined by the Board and complete post-module tests with a score of at least 70%.

After initial certification, security officers will be required to complete 16 hours of continuing education each biennium.

Result of Analysis

There is insufficient information to ascertain whether benefits outweigh costs for this regulatory change.

Estimated Economic Impact

Of the requirements that the Board proposes for campus security officers, several will likely have no additional costs attached. Individuals must already be legally eligible to work in order to be legally employed. Individuals must also already be licensed to operate a motor vehicle before they can drive whether they are driving as part of their job or not. The Board's proposed language that mirrors these already existing laws is unlikely to cause any additional costs for regulated entities.

Several other proposed requirements will likely have some costs attached for campus security officers or their employing colleges. Criminal background checks are run by the State Police who charge a \$35 fee. To the extent that colleges don't already require such checks as a condition of employment, they will incur additional annual costs of \$35 times the number of campus security officers hired each year. There are also costs attached to completing the Board approved initial training, Board approved continuing education and the required FEMA online course. The Department of Criminal Justice Services (DCJS) reports that they currently provide both initial training and continuing education for no fee to potential and current campus security officers so these individuals will likely only incur costs for time spent in training and in taking the required tests as well as potentially costs for travelling to where the training is offered. DCJS further reports that they intend to have training available online in 2012. This will likely lower costs for regulated entities as they will then not have to travel for training and will be able to complete training when it is most convenient for them. Regulated entities will also incur costs for time spent completing the FEMA online course.

To the extent that state required training and certification for campus security officers makes college campuses safer, individuals who frequent college campuses will benefit.

Currently, there is insufficient information about the magnitude of any potential benefits to ascertain whether they will outweigh costs incurred.

Businesses and Entities Affected

DCJS reports that all campus security officers, approximately 70 colleges and universities and approximately 50 small business security firms will be affected by these proposed regulations.

Localities Particularly Affected

No localities will be particularly affected by these proposed regulatory changes.

Projected Impact on Employment

This regulatory action will likely have little impact on employment in the Commonwealth.

Effects on the Use and Value of Private Property

This regulatory action will likely have no effect on the use or value of private property in the Commonwealth.

Small Businesses: Costs and Other Effects

Affected small businesses may incur costs if they pay their staff wages for their time spent training for certification.

Small Businesses: Alternative Method that Minimizes Adverse Impact

There do not appear to be any alternate regulatory methods that would both meet the Board's goals and further reduce costs for affected small businesses.

Real Estate Development Costs

This regulatory action will likely have no effect on real estate development costs in the Commonwealth.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 36 (06). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or

other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.

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