

Response to Department of Planning and Budget

Economic Impact Analysis

6 VAC 20-80

The Department of Criminal Justice Services Standards and Training Section concurs with the economic impact analysis as reviewed by the Department of Planning and Budget with the following exceptions:

In the summary paragraph, the last sentence should read as follows: The proposed regulation will also allow individuals who are otherwise qualified as instructors in a specialized area, but are newly hired by an agency or department, to conduct training in their specialty without having to work for the agency or department two years first. The change in the rules applies only to specialties and the additional wording will add clarity.

In the second paragraph under the Estimated Economic Impact, additional clarification is also needed. The proposed regulation eliminates the current requirement of four (4) hours of core instructor subjects and maintains the requirement of two (2) hours per specialty, e.g., a general instructor takes two hours related to general instruction, a firearms instructor takes two hours related to firearms, etc. As a result there is no increase in the training hours, instead, there is a four (4) hour decrease overall.