

PROPOSED RULE AMENDMENTS

12NCAC 10B .0205 Minimum Training Requirements

The Sheriffs' Education and Training Standards Commission proposed amendments to this rule for the purpose of updating the In-Service Training requirements to reflect the 2017 mandated training topics for justice officers in North Carolina.

Public Comment Period

September 30, 2016 - November 14, 2016

Instructions for Written Comments: The objection, reason(s) for objection, and the clearly identified portion of the rule to which the objection pertains must be submitted in writing to:

Diane Konopka
Department of Justice
Sheriffs' Standards Division
Post Office Box 629
Raleigh, NC 27602

1 12 NCAC 10B .2005 IS PROPOSED TO BE AMENDED AS FOLLOWS:

2
3 12 NCAC 10B .2005 MINIMUM TRAINING REQUIREMENTS

4 (a) A Sheriff or Department Head may use a lesson plan developed by the North Carolina Justice Academy or
5 a lesson plan for any of the topic areas developed by another entity. The Sheriff or Department Head may also
6 use a lesson plan developed by a certified instructor, provided that the instructor develops the lesson plan in
7 accordance with the Instructional Systems Development model as taught in Criminal Justice Instructor Training
8 and as described in 12 NCAC 09B .0209. Lesson plans shall be designed to be delivered in hourly increments.
9 A student who completes the training shall receive the number of credits that correspond to the number of
10 hours assigned to the course, regardless of the amount of time the student spends completing the course,
11 where each hour of instruction shall be worth one credit (e.g., "Legal Update" is designed to be delivered in
12 four hours and will yield four credits). With the exception of Firearms Training and Requalification, successful
13 completion of training shall be demonstrated by passing tests as developed by the delivering agency or as
14 written by the North Carolina Justice Academy. A written test comprised of at least five questions per hour
15 of training shall be developed by the delivering agency, or the agency may use the written test developed by
16 the North Carolina Justice Academy, for each in-service training topic. A student shall pass each test by
17 achieving 70 percent correct answers. Firearms Training and Requalification shall be demonstrated
18 qualification with a firearm as set out in Section .2100 of this Subchapter.

19 ~~(b) The 2015 Law Enforcement In-Service Training Program requires 24 credits of training and~~
20 ~~successful completion in the following topic areas:~~

- 21 ~~(1) Legal Update;~~
22 ~~(2) Juvenile Minority Sensitivity Training: What does it have to do with me?;~~
23 ~~(3) Domestic Violence: Teen Dating Violence;~~
24 ~~(4) Firearms Training and Requalification for deputy sheriffs as set out in Section .2100 of~~
25 ~~this Subchapter; and~~
26 ~~(5) Any topic areas of the Sheriff's choosing.~~

27 ~~(c) The 2015 Detention Officer In-Service Training Program requires 16 credits of training and successful~~
28 ~~completion in the following topic areas:~~

- 29 ~~(1) Legal Update;~~
30 ~~(2) Documenting the Incident;~~
31 ~~(3) Emotional Survival for Detention Officers; and~~
32 ~~(4) Any topic areas of the Sheriff's or Department Head's choosing.~~

33 ~~(d) The 2015 Telecommunicator In-Service Training Program requires 16 credits of training and~~
34 ~~successful completion in the following topic areas:~~

- 35 ~~(1) Crisis Negotiation;~~
36 ~~(2) Interpersonal Communications: Team Building;~~
37 ~~(3) Emotional Survival;~~

1 (4) ~~Tactical Dispatch; and~~

2 (5) ~~Any topic areas of the Sheriff's or Department Head's choosing.~~

3 (e) ~~(b)~~ The 2016 Law Enforcement In-Service Training Program requires 24 credits of training and
4 successful completion in the following topic areas:

5 (1) Legal Update;

6 (2) Juvenile Minority Sensitivity Training: The Color of Justice;

7 (3) Human Trafficking Awareness;

8 (4) NC Firearms Laws: Citizens with Guns;

9 (5) Firearms Training and Requalification for deputy sheriffs as set out in Section .2100 of
10 this Subchapter; and

11 (6) Any topic areas of the Sheriff's choosing.

12 (f) ~~(c)~~ The 2016 Detention Officer In-Service Training Program requires 16 credits of training and successful
13 completion in the following topic areas:

14 (1) Career Survival: Stop! Think About What You Are Doing;

15 (2) Communicable Diseases;

16 (3) Detention Intelligence Update;

17 (4) Understanding PREA; and

18 (5) Any topic areas of the Sheriff's or Department Head's choosing.

19 (g) ~~(d)~~ The 2016 Telecommunicator In-Service Training Program requires 16 credits of training and
20 successful completion in the following topic areas:

21 (1) Communicating Effectively with Crisis Callers;

22 (2) Becoming a Leader in the Communications Center;

23 (3) Handling Suicidal Callers; and

24 (4) Any topic areas of the Sheriff's or Department Head's choosing.

25 (e) The 2017 Law Enforcement In-Service Training Program requires 24 credits of training and successful
26 completion in the following topic areas:

27 (1) Legal Update;

28 (2) Juvenile Minority Sensitivity Training: Positively Impacting Today's Youth;

29 (3) Domestic Violence: Protecting Victims of Domestic Violence;

30 (4) Improving Decision Making Skills

31 (5) Firearms Training and Requalification for deputy sheriffs as set out in Section .2100 of this
32 Subchapter; and

33 (6) Any topic areas of the Sheriff's choosing.

34 (f) The 2017 Detention Officer In-Service Training Program requires 16 credits of training and successful
35 completion in the following topic areas:

36 (1) Detention Legal Update;

37 (2) Detention Intelligence Update;

- 1 (3) Recognizing Substance Abuse and Withdrawal;
- 2 (4) Improving Decision-Making Skills; and
- 3 (5) Any topic areas of the Sheriff's or Department Head's choosing.

4 (g) The 2017 Telecommunicator In-Service Training Program requires 16 credits of training and successful
5 completion in the following topic areas:

- 6 (1) Post Critical Incident Stress Management;
- 7 (2) Protecting Victims of Domestic Violence;
- 8 (3) Improving Decision Making Skills;
- 9 (4) Law Enforcement Intelligence Update
- 10 (5) Any topic areas of the Sheriff's or Department Head's choosing.

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12 History Note: Authority G.S. 17E-4; 17E-7;

13 Eff. January 1, 2007;

14 Amended Eff. January 1, 2017; January 1, 2016; January 1, 2015; February 1, 2014; January 1, 2013; February 1,
15 2012; January 1, 2011; January 1, 2010; January 1, 2009; January 1, 2008.

Impact Analysis

Rule Title: Education and Training Standards for 2017

Agency: Department of Justice

Contact: Diane Konopka

Impact: State Impact: Yes
Local Impact: Yes
Substantial Economic Impact: Yes

Rule Citation: 12 NCAC 10B .2005

Statutory authority: G.S. 17E-4 and 17E-7

Summary of the Proposed Regulation

The NC Sheriffs' Education and Training Standards Commission is charged with setting the minimum education and training standards for justice officers (deputy sheriffs, detention officers, and telecommunicators) in this state. Deputy Sheriffs, detention officers, and telecommunicators each perform a vital role in ensuring that public health, safety and welfare are well guarded.

The Commission has determined that specific expertise is needed for individuals to teach particularized topical areas of instruction in order to ensure that the material is being taught by competent instructors. In order to ensure that deputy sheriffs, detention officers, and telecommunicators remain knowledgeable and competent in their job duties, the Commission has determined that annual in-service training should be required.

Table 1 below summarizes the quantified impacts of changes proposed for the 2017 in-service training, followed by a rule-by-rule description of the proposed changes and their impact (see proposed rule text in Appendix A).

TABLE 1. Summary of the 2017 Impacts of the Proposed Regulations

Affected Party	Quantified Benefits	Quantified Costs
Local Government	\$8.9	\$11.3
State Government	N/A	\$1.6
Private Entities	N/A	N/A
Total	\$8.9	\$12.8

Note: Only quantified benefits and costs are included in the table. In some cases, such as benefits to the public from improved performance and coordination among justice officers resulting from in-service training, unquantified benefits and costs are likely to be significant. Components may not sum to total due to rounding.

Impact of Proposed Changes to 12 NCAC 10B .2005

Description: The revisions set out what will be required for in-service training in 2017. These in-service training programs began in 2005 with deputies completing 4 hours of domestic violence training. Since 2006 deputies have been required to complete 24 hours of in-service training. Since 2007, detention officers and telecommunicators have been required to complete 16 hours. In 2017, deputies must likewise complete approximately 24 hours, and detention officers and telecommunicators must complete 16 hours. Effective in 2013, the in-service requirement was no longer based upon hours of instruction received, but rather credits, based upon the person completing the training and showing proficiency in the topics by passing tests.

Purpose: To improve performance, reduce errors and reduce the number of lawsuits, and protect public health, safety and welfare by ensuring each officer remains knowledgeable in the relevant subject areas of enforcement, corrections, or communications.

Baseline: Current rules only lay out the in-service training requirements through 2016. Without these rule changes there would be no requirements for 2017, with the exception of Firearms Qualification, which is separately required in 12 NCAC 10B Section .2100. Firearms training may be conducted, at a minimum, in 4 hours. Therefore the impact of these rules is the cost related to the training requirements for deputies, detention officers, and telecommunicators.

Cost Estimates: The rule change for training only affects 2017, so the costs are confined to this one year. There is a cost impact to local governments and, to a lesser extent, the State. The local government costs are for training and the time that employees will be taken away from doing their jobs. The assumed baseline is that local governments would conduct no applicable training without these requirements.

Local cost estimate (includes three types of justice officers):

In-Service Training Costs:

Deputy sheriffs are required to have a total of 24 credits of training in 2016, 20 credits of which is above the baseline since deputies are already required to undergo 4 hours of firearms training. First, there is a cost of the time they must spend in training. The estimated average salary and benefits (assumed at 73% of average salary¹) for a deputy sheriff is \$75,000 per year. In addition, they are estimated to work 2,080 hours a year, which results in an estimated total compensation of \$36 per hour. Therefore, the opportunity cost of 20 hours spent in training is approximately \$720 per individual. This represents the value of the time the deputy sheriffs could have spent on law enforcement. There are approximately 8,340² full-time deputy sheriffs (and this number is unlikely to change significantly in 2017), putting the total estimated opportunity cost at \$6 million. In addition, there is a cost to conducting training. The Commission polled a sample of colleges and agencies offering training to obtain an overall average hourly compensation rate for instructors. The high-end hourly compensation rate is approximately \$29 per hour, while the low end is approximately \$23.75 per hour. For the purposes of this analysis, an hourly compensation rate of \$26, the midpoint of these two averages, was used. Therefore, an instructor costs \$520 for 20 hours of training and is needed for every 20 students (about 420 instructors) at an annual cost of approximately \$220,000.

Detention officers are required to have 16 credits of training in 2017. To obtain a conservative impact estimate, this analysis assumes that none of the detention officers will undergo the 4 hours of firearms training required by the current rules since most officers are not authorized to carry a firearm. First, there is a cost of the time they must spend in training. The estimated average salary and benefits (assumed to be 73% of average salary) for a detention officer is \$62,000 a year. In addition, they are estimated to work 2,080 hours a year, which results in an estimated total compensation of \$30 per hour. Therefore, the opportunity cost of 16 hours spent in training is approximately \$480 per detention officer. This represents the time the detention officers could have spent on corrections functions. There are 6,815³ full-time detention officers, putting the total estimated opportunity cost at \$3.3 million. In addition, there is a cost to conducting training. An instructor costs an estimated \$420 for 16 hours of training and is needed for every 20 students (345 instructors), putting the annual cost at \$140,000.

Telecommunicators are required to have 16 credits of training in 2017 (note telecommunicators do not have to undergo firearms training). First, there is a cost of the time they must spend in training. The

¹ The value of benefits is estimated as 73% of annual salary (42% of total compensation) based on US Bureau of Labor Statistics data on the total compensation of service occupations in state and local governments, available online at <http://www.bls.gov/news.release/ecec.t03.htm>.

² Number of full-time deputies calculated from North Carolina Department of Justice Training and Standards Database, as of August 2016.

³ Number of full-time detention officers calculated from North Carolina Department of Justice Training and Standards Database, as of August 2016.

estimated average salary and benefits for a telecommunicator is \$55,000 a year.⁴ In addition, they are estimated to work 2,080 hours a year, which results in an estimated total compensation of \$26 per hour. Therefore, the opportunity costs of 16 hours spent in training is approximately \$420. This represents the time the telecommunicators could have spent on communications functions. There are approximately 1,100⁵ full-time telecommunicators, putting the total estimated opportunity cost of about \$460,000. In addition, there is a cost to conducting training. An instructor costs an estimated \$420 for 16 hours of training and is needed for every 20 students (55 instructors), putting the annual cost at \$23,000.

The total estimated opportunity cost of training for local justice officers is \$9.8 million, and the total estimated cost of instruction is \$380,000. Given that 5 of the 40 entities providing training are local agencies, it is assumed that \$48,000 of the cost of instruction is borne by local governments.

Retesting Costs:

Rule .2005 requires trainees to pass a written test for each in-service training topic with a score of 70% or higher. The rule implies that trainees can re-test if they fail to obtain an adequate score. An In-Service IMPACT Study Report, prepared by the North Carolina Justice Academy Research Office, found that 3.8% of individuals taking in-service training failed the initial end-of-training delivery test.

Each in-service test will have five test questions for each hour of instruction, and each test question is expected to take two minutes to complete. For the deputy sheriff in-service training, this equates to 3.33 hours for testing. Based on the historical failure rate of 3.8%, we estimate that 317 deputies may need to retest, for a total of 1,057 hours of retesting. At an average hourly total compensation rate of \$36, total opportunity costs for deputies needing to retest would be approximately \$38,000.

For the detention officer in-service training, this equates to 2.67 hours for testing. Based on the historical failure rate of 3.8%, we estimate that 259 detention officers may need to retest, for a total of 691 hours of retesting. At an average hourly total compensation rate of \$30, total opportunity costs for detention officers needing to retest would be approximately \$21,000.

For the telecommunicator in-service training, this equates to 2.67 hours for testing. Based on the historical failure rate of 3.8%, we estimate that 42 telecommunicators may need to retest, for a total of 112 hours of retesting. At an average hourly total compensation rate of approximately \$26, total opportunity costs for telecommunicator needing to retest would be approximately \$3,000.

Total opportunity cost of trainees for re- testing is \$62,000.

⁴ All average salaries are based on data from the 2016 County Salaries Index of the UNC School of Government, available online at <http://sogpubs.unc.edu/electronicversions/pdfs/cosal2015/emertel.pdf>. The value of benefits is estimated as 42% of annual salary based on BLS data, available online at <http://www.bls.gov/news.release/ecec.t03.htm>.

⁵ Number of full-time telecommunicators calculated from North Carolina Department of Justice Training and Standards Database, as of August 2016.

Retesting would also create a cost in terms of instructors who have to supervise the retesting. Assuming that 1 instructor would be needed for every 20 trainees, a total of 32 instructor hours would be needed (or 16, 13 and 3 instructors for deputy sheriffs, detention officers, and telecommunicators, respectively). At an instructor hourly compensation of \$26, the total costs equates to about \$2,500. Given that 12% of the entities providing training are local governments, it is assumed that \$300 of the instructor costs for retesting is borne by local governments.

State cost estimate

Duties for administering the in-service training program are split between five existing positions in the Sheriffs' Standards Division at DOJ. The total annual salary cost to this division, excluding benefits, is estimated at \$56,000 for the partial time spent by the positions.

Much of the work for developing the training program occurs at the NC Justice Academy. The Justice Academy received one program assistant funded at nearly \$34,000 during a previous legislative session. However, work there will continue to be split between the new position and 14 other positions. The total annual salary cost is \$134,000 for both the new program assistant position and the partial time spent by the other 14 positions.

Including the value of State-provided benefits, which are estimated to be an average of 51.4 percent of annual salary based on OSBM data, the total State cost is \$288,000.⁶

The state would also have to incur the costs related to the instruction of local justice officers that takes place in community colleges. Given that 35 of the 40 entities providing training are community colleges, this analysis assumes that close to \$330,000 of the training costs and \$2,200 of the retesting costs for instructors is borne by state government.

Indirect Impact

The proposed 2017 In-Service Training Requirements would result in additional, indirect costs stemming from rules that do not require to be changed but are impacted by the proposed rule change in .2005. These rules include 12 NCAC 10B .2003 and .2009 (see rule text in Appendix B). The impact of these two rules was initially estimated and presented in the fiscal note prepared when the rules were amended in 2012, but only covered the impact the rules would have in 2013.⁷ This fiscal note includes the impact of these rules for 2017, which presumably will not be much different from the total estimated impact to local governments and community colleges in the 2012 fiscal note, aside from updating total compensation costs. Therefore, the indirect impact from the 2017 changes is estimated at of \$1.4 million for local governments and about \$940,000 for community colleges.

⁶ Based on the OSHR 2014 Report on Salaries and Benefits, benefits are calculated as 51.4% of salary. The OSHR report is available online at <http://www.oshr.nc.gov/Guide/CompWebSite/2014%20compensation%20&%20benefits%20report.pdf>

⁷ See the fiscal note for rules .2003 and .2009 (as well as other rules), approved by the Office of State Budget and Management on June 20, 2012, at the following OSBM website: <https://ncosbm.s3.amazonaws.com/s3fs-public/documents/files/DOJ06202012.pdf>

Benefit Estimates from Proposed Rules

Unquantified Benefits

Unquantified benefits include improved performance, a reduction in errors and a resulting reduction of lawsuits, and better protection of public health, safety and welfare. Requiring in-service training in specified topical areas statewide ensures each officer – regardless of where he/she is employed – remains knowledgeable about changes in law, practical techniques, and other relevant topics such as domestic violence, autism, terrorism, school violence, etc. This standard framework makes joint operation, communication, and dealing with the public easier.

Quantified Benefits

An additional benefit expected benefit is a decrease in staff turnover and turnover-related costs. The 2003 Sheriffs' Commission and Governor's Crime Commission published the results of Recruitment and Retention Studies⁸ for each type of justice officers impacted by these changes. Educational incentives and training opportunities were found to be highly ranked as an effective technique for retaining these employees. The turnover rate for deputy sheriffs, detention officers, and telecommunicators averaged 16 percent, according to the above 2003 study.

A 2000 study by Michele Graef and Erick Hill found that many studies of employee turnover estimated the cost of replacing skilled professional employees to be between 70 percent and 200 percent of the employee's average salary.⁹ An unpublished, early-2000s study by the Louisiana State University Staff Senate found that the direct and indirect turnover costs for protective services personnel amounted to roughly \$25,000 per vacancy (more than \$33,700 in 2015 dollars).^{10, 11} The conservative end of the studies reviewed by Graef and Hill (70 percent of annual salary, excluding benefits) yield turnover cost estimates of \$30,000 per vacancy for deputy sheriffs, \$25,000 for detention officers, and \$22,000 for telecommunicators. The estimated benefits from reducing turnover (see table below) are based on these per vacancy cost estimates.

⁸ NC Department of Public Safety. *Recruitment and Retention Study Series*. April 2003.

- Detention Facility Personnel: <https://www.ncdps.gov/div/gcc/PDFs/Pubs/NCCJAC/rrdetention.pdf>,
<https://www.ncdps.gov/div/gcc/PDFs/systemstats/wint04.pdf>
- Sworn Sheriffs' Personnel: <https://www.ncdps.gov/div/gcc/PDFs/Pubs/NCCJAC/rrsheriff.pdf>
- Telecommunications Officers: <https://www.ncdps.gov/div/gcc/PDFs/pubs/nccjac/rrsstel.pdf>

⁹ Graef, Michele I. and Erick L Hill. (2000). "Costing Child Protective Services Staff Turnover." *Child Welfare*, Sept/Oct,79 (5): 517.

¹⁰ Cited by Gilean Smith in "Love thy employee or make the cut? You decide," Examiner.com. February 28, 2011.

<http://www.examiner.com/article/love-thy-employees-or-make-the-cut-you-decide>

¹¹ To inflate costs estimated in 2000 to 2015, the analysis used NC Consumer Price Index (30-year baseline forecast) data from the IHS Connect Regional Database. The inflation factor between the two aforementioned years is about 1.35.

TABLE 2. Estimated Local Benefits from Training-Related Reductions in Employee Turnover

	Total Full-Time Employees (2014)	1 Percent of Total Employees	Estimated Benefits of Reducing Turnover (in millions)		
			1 percentage point	2 percentage points*	4 percentage points
Deputy Sheriff	8,340	83	\$2.49	\$4.98	\$9.96
Detention Officer	6,815	68	\$1.70	\$3.40	\$6.80
Telecommunicator	1,110	11	\$0.24	\$0.48	\$0.97
Total	16,100	161	\$4.43	\$8.86	\$17.73

* The Commission believes that a reduction in two percentage points is the most plausible assumption.

Note: Estimated benefits of reducing turnover based on cost per vacancy of 70 percent of a professional employee’s annual salary (see text above for details).

A reduction in turnover of 1-4 percentage points resulting from the proposed in-service training would generate benefits of approximately \$4.43 million to \$17.73 million in 2017. Based on the combined evidence of Graef-Hill study and the results of the 2003 recruitment and retention surveys, the Commission believes that a 2-percentage-point reduction in turnover resulting from mandating in-service training is a plausible, conservative estimate.

Alternatives

There are not many alternatives that are likely to improve performance and reduce the error rate across all jurisdictions other than training. Alternatives to the proposal include: 1) returning to complete local flexibility in training and 2) completely centralized training. Local flexibility could result in some justice officers no longer having the opportunity to attend training beyond the basic courses. In addition, as an officer changes from one agency to another, there is no assurance that the officer has received the most current training on recent legal updates, practical techniques, and others areas. Centralized training would somewhat improve the benefits by allowing uniform testing and measurement of testing success, but it would require hundreds of trainers and organizers. It would also require a large amount of travel time. These time and cost constraints did not allow centralized training to be feasible.

Risk Analysis

Although the cost and benefit estimates in this fiscal note are based on plausible assumptions, in several cases, alternative plausible assumptions result in significant changes to the cost and benefit estimates.

In the case of the benefits of mandated training, we used a conservative assumption of a two percentage-point reduction in turnover. If the actual impact of the Commission’s mandated in-service training were to reduce turnover by one percentage point, the associated benefits would be \$4.4 million

instead of \$8.9 million. If the actual impact were to reduce turnover by four percentage points, the associated benefits would be approximately \$18 million.

Similarly, there are alternative plausible assumptions regarding turnover costs. We estimated the benefits of turnover-related training benefits based on the assumption that turnover costs per vacancy equal approximately 70 percent of a professional employee's salary. If turnover costs per vacancy are only 50 percent of an employee's salary, then the benefits from reducing turnover would be approximately \$6.5 million in 2017 instead of \$8.9 million given a two-percentage-point reduction in turnover among justice officers. At a per vacancy cost of 100 percent of an employee's salary, the benefits from reducing turnover would be approximately \$13 million.

Conclusion

Please note that most costs represent opportunity costs and typically do not represent new cash outlays required by state or local agencies. The overwhelming majority of these local sheriffs, detention officers, and related positions impacted by these rule changes are salaried employees. The time they spend on these training requirements is time they are not spending on patrol or on their primary law-enforcement duties. However, this additional training can ensure that these employees are more efficient and productive employees after training is completed.

Some of the costs presented below, however, could be budgetary costs. Part of the costs related to instructors may in fact be budgetary costs depending on whether community college or local law enforcement agency use in-house staff with instructor certification or hire from outside.

The Department of Justice has requested expansion funding to address the administrative costs associated with the proposed training requirements. During a past legislative session, only one position of the eleven requested was approved. If additional expansion funding is not provided by the General Assembly, these administrative functions will be absorbed within current operating budgets.

TABLE 3. Impacts from Proposed Rule Changes

BENEFITS	2017
<i>Local Government Benefits</i>	
Reduced direct and indirect costs associated with justice officer turnover due to training (.2005)	\$8.9m
<i>Public Benefits</i>	
Improved public safety office performance, improved coordination, and reduced errors by justice officers (.2005)	Significant, unquantified
COSTS	
<i>Local Government Costs</i>	
Opportunity costs of justice officers' time spent conducting in-service training (including retests) (.2005)	\$9.8m
Direct costs associated with hiring instructors for in-service training (including retests) (.2005)	Less than \$0.1m
Opportunity costs of In-Service Training Coordinators associated with administrative tasks (.2003 & .2009)	\$1.4m
Total Local Costs	\$11.3m
<i>State costs</i>	
Direct costs associated with hiring instructors for in-service training (including retests) (.2005)	\$0.3m
Opportunity costs of community college school directors associated with administrative tasks (.2003 & .2009)	\$0.9m
Opportunity costs of NC Justice Academy and other Department of Justice Staff associated with administrative tasks (.2003 & .2009)	\$0.3m
Total State Costs	\$1.6m

Note: Minor unquantified benefits not included in the above table. Parts may not sum to totals due to rounding.