

**INITIAL STATEMENT OF REASONS**  
**Electronic Course Certification Process**  
**Regulations 1053, 1054, 1055, 1058, and 1070**

The changes to POST Regulations are proposed with the intention of implementing the Electronic Data Interchange Course Certification application. The State's course presenters as well as the California Commission on Peace Officer Standards and Training (POST) will benefit from the capabilities provided by contemporary information technology systems by migrating to the EDI course certification process. By implementing this enterprise model system, which is similar to online systems used by commercial corporations and other government agencies, POST can streamline the course certification process. POST is streamlining the process eliminating many of the inefficiencies inherent in the current paper based process. The current suite of forms that course presenters must complete to request a course certification inherently includes data redundancy, incomplete data, invalid data, etc. Consequently, the user interface presented to the user via the EDI Course Certification application replaces and eliminates the need for preformatted paper forms. Because the EDI Course Certification application exploits the power of relational database design, and minimizes data redundancy because there is no need to collect the name of an instructor more than one time. This application provides data validation (an eight-hour block of training cannot be part of a 4-hour training course); real-time status checks are available, and when necessary, return time is greatly reduced.

POST has converted the content of POST forms used for the course certification process to an electronic format. Course presenters will use the POST Electronic Data Interchange (EDI) Course Certification Process instead of the paper forms. The electronic format captures the content of the paper forms, with the below-listed exceptions. The "new" items collect information needed to better evaluate the certification request and, in several cases, collect needed information that POST staff currently obtains by telephone. The "deleted" items are either redundant, collected in another part of the Course Certification process, or are not applicable in the EDI process (EDI access approval replaces signature). After the Commission approves proceeding with these changes, a statement of reasons will address each change.

The January 1, 2007 effective date of the regulation has been set in consideration of the time taken for presenters to plan for implementing and using the EDI Course Certification application. This date was developed based on the timelines required for software development, user guide development, staff training, and demonstration to course administrators by Area Consultants.

**Justification for Amendments to Regulation 1053**

*1053(a):* The amended second sentence identifies the requirement of using the EDI Course Certification application. The word "package" has been removed as it implies a physical set of forms, all of which are obsolete and have been eliminated. The third and final sentence of the first paragraph has been changed to identify the process of using the EDI Course Certification application to submit information comprised in a course certification request. The words "Submission of the," "forms," "and related materials," and "package" have been removed as they reference the paper and are not relevant to the electronic process.

*1053(a)(1):* To identify the process of using the EDI Course Certification application to submit Course Certification Request data, the words "data" and "(EDI Course Certification application)" have been added; conversely, to remove any reference to the paper forms no longer needed, the words "(POST 2-103, rev. 5/00)" have been removed.

The data collected is now referred to as Course Administration Information. Through the EDI process, the "Course Administration Information" screen collects the bulk of the information collected on the Course Certification Request (CCR). This screen does not, nor was it intended to, serve as a direct replacement to the CCR. The goal of this project is to collect information from the user in a more efficient and effective manner than possible with the current paper process.

**Course Certification Request form items that will not have a field on the EDI version:**

**INITIAL STATEMENT OF REASONS**  
**Electronic Course Certification Process**  
**Regulations 1053, 1054, 1055, 1058, and 1070**

Residency Required - This information will be collected from the user in the field identified with "Restrictions" as the label.

Living Accommodations - This information will be collected from the user in the field identified with "Restrictions" as the label.

Cost - It is not necessary to collect the cost information here; the budget section of the application queries the user for all necessary budgetary information. The "Budget" section of the EDI system now collects information relative to the cost of course presentation.

Text and Reference Material - This information will be collected from the user in the field identified with "Training Aids Used" as the label.

**Course Certification Request data that will have a field on the EDI version:**

Secondary Course Title - Necessary to better categorize the over 8,000 courses certified

Fiscal Year - Necessary to solicit this information from the user so both presenter and POST are consistent with the fiscal year to apply to the initial certification

Variable/Fixed Format - Regional consultants currently have to call the agency to ascertain this information for processing-it is necessary at certification time

Is this course specific to Dispatchers - Collection of this information is necessary for ensuring appropriate training for Public Safety Dispatchers

Do you wish to publish this course in the catalog - Currently collected by phone calls to the presenter; this will eliminate the need for a call

Is this a PSP course - Necessary for compliance requirements in certain courses; currently Regional Consultants must call the presenter.

Categories - Provides the user the ability to identify the appropriate category for the proposed course

Is this course a Legislative Mandate - Explicitly identifies a course as satisfying a Legislative Mandate - provides awareness to both the presenter and POST

Is this course in response to POST regulatory training requirements - Explicitly identifies a course as satisfying a POST requirement - provides awareness to both the presenter and POST.

Does this course require standardized curriculum - Provides awareness to both the presenter and POST for courses identified as having "standardized" curriculum

Revisit content prior to course - This is necessary to distinguish "refresher" courses from update courses; refresher courses are those courses that provide training on topics that may not have necessarily changed, but due to low frequency of skill or knowledge use, the training is perishable and requires refreshing.

Is this course highly dynamic – POST needs to identify courses that contain topics that are subject to routine updating and/or changes.

Does this course require a safety guideline - Identifies courses that require a safety guideline  
Subventions - Explicit identification of courses that receive funding from subventions

**INITIAL STATEMENT OF REASONS**  
**Electronic Course Certification Process**  
**Regulations 1053, 1054, 1055, 1058, and 1070**

Are pre-requisites required - Identifies any pre-requisites for the course

Proposed presentation dates - Provides more overall efficiency by identifying potential dates of presentation

On-site/Off-site presentations - Necessary for determining the exact location of training sites

Material agency fees - This inquiry allows POST to validate and disclose any fees associated with the course to the subscribing clients. There is an expectation from the law enforcement clients that POST certified courses are evaluated and approved based on legitimate standards, by soliciting this information from requestors, we are able to verify the validity of such charges.

E-mail address - Necessary for contact outside the EDI system, but still leveraging the power of web technology

*1053(a)(2)*: To identify the process of using the EDI Course Certification application to submit Instructor Resume data information, the words “data,” “(EDI Course Certification application),” and “user interface” have been added; conversely, to remove any reference to the paper forms no longer needed, the words “(POST form 2-112, 4/03)” and “resume form” have been removed.

**Instructor Resume data that will have a field on the EDI version:** Add “Course” before “Instructor Resume” title for clarity.

**Instructor Resume data that will not have a field on the EDI version:** Signature requirements have been removed from box 25 and 27. The presenter-specific information (Business Address and contact information) collected in box 28 is automatically populated by POST, and updated as necessary; thus, the specific questions (Address, City, State, Zip) have been removed.

*1053(a)(3)*: To identify the process of using the EDI Course Certification application to submit Course Budget data, the words “data,” “(EDI Course Certification application),” have been added; conversely, to remove any reference to the paper forms no longer needed, the words “(POST form 2-106 rev. 7/93)” have been removed.

*1053(a)(4)*: To identify the process of using the EDI Course Certification application to submit Expanded Course Outline data, the words “data,” “(EDI Course Certification application),” have been added. A reference is added for clarity. There are no data collection changes to the Expanded Course Outline.

*1053(a)(7)*: Signature is deleted because the system logon authenticates the user and that authentication represents the signature authority.

*1053(b)(1)*: To identify the process of using the EDI Course Certification application for course certification review, the words “request,” “via the EDI,” “of the status of the request.,” and “If the request is incomplete, the Commission shall return the request via the EDI with comments to the requestor identifying the areas that need to be completed” have been added; conversely, to remove any reference to the paper forms no longer needed, the words “package,” “documents included in the package,” “in writing,” “that the package is either complete or incomplete,” and “In event the file is incomplete, the Commission shall inform the requestor of the document(s) which must be submitted” have been removed.

**INITIAL STATEMENT OF REASONS**  
**Electronic Course Certification Process**  
**Regulations 1053, 1054, 1055, 1058, and 1070**

*1053(b)(2)*: For consistency with other subsections of this regulation, the word “request” has been added, and the words “package” and “package” have been removed as they are terms that imply, or are traditionally associated with, paper based forms.

1053 (c) The title change is made so that modifications and corrections are addressed in this area, to distinguish the two and clarity. Information regarding the rules for reporting modifications and corrections is expanded to distinguish the two and for clarity and to place all language regarding course changes in one section of the regulations, for clarity.

1053 (c) (1): Modifications are defined to distinguish them from course corrections.

1053 (c) (2): A section title is added for clarity.

1053 (c) (3): Corrections are defined to distinguish them from course modifications.

---

**Justification for Amendments Regulation 1054**

*1054*: For consistency with regulation 1053, the words “(POST 2-103, REV. 5/00),” “(POST 2-106, rev. 7/93),” “a,” and “a” have been removed as they reference eliminated forms. To emphasize the use of the EDI Course Certification application, the words “data” and “data” have been added.

*1054(l)*: For consistency with regulation 1053, the words “(POST 2-106 REV. 7/93)” have been removed as they reference eliminated forms. To emphasize the use of the EDI Course Certification application for identifying subventions, the words “in” and “data” have been added.

**All existing Course Budget data will have a field on the EDI version.** The EDI Course Budget screen replaces the Course Budget and collects the same information.

**Course Budget data that will have a field on the EDI version:**

General – For consistency with Regulation 1054

Presentation – For consistency with Regulation 1054

Site Indicator - Identifies the specific site for purpose of calculating travel costs

Course Facilities Cost - A factor reimbursement plans

---

**Justification for Amendments to Regulation 1055**

*1055 (d)*: This is deleted because the requirements are met through reporting Regulation 1053 (c) changes and the collection of subvention information in the new Course Administration data collection.

1055 (e) – (k) are re-lettered accordingly.

*1055(e) - new*: For consistency and emphasis on the use of the EDI Course Certification application, the words “Presentation Request,” “Presentation Request,” “via the EDI,” “Any changes to the course (hourly distribution, instructors, location, expanded course outline, budget, safety policy, etc.),” “The,” and “Presentation Request” have been added; conversely, the words “Announcements,” “Announcement (POST 2-110 Rev. 8/89),” “Announcement,” “An hourly distribution schedule must be attached to each Course Announcement..,” “A,” and the small letter “p” has been removed as they reference the paper form process.

**INITIAL STATEMENT OF REASONS  
Electronic Course Certification Process  
Regulations 1053, 1054, 1055, 1058, and 1070**

Information currently collected on the Course Announcement will primarily be collected in the section identified as Course Presentation.

**Course Announcement data that will have a field on the EDI version:** “Second Site” is new relevant data that is collected because as trainees are reimbursed travel to a second site, it is imperative that POST has the actual location for calculating reimbursement amounts.

**Course Announcement data that will not have a field on the EDI version:** This data is obtained from other questions asked within the system and, therefore, are unnecessarily redundant.

- "F" Basic Course Only - List Dates of Driver Training
- "G" Total Certified Hours
- "H" Hours for Presentation
- "K" Dates
- "L" For PC 832 and Reserve Module A Courses Only
- "O" ...lodging is \_\_\_\_ miles from the training location. Entire section.
- Transportation is ... (explain)
- "P" Lodging entire section
- "Q" Meals entire section
- "S" Signature of coordinator
- "T" Date completed system generated
- "U" Phone collected elsewhere

*1055(f) new:* The amended wording adds current, mandated training courses that belong in this section.

*1055(g) new* – In Sections (1) and (2), The Course Evaluation Instrument, POST 2-291 (was 2-245), and the POST Course Evaluation Control Sheet, Scantron Form No. F-374, are removed because an electronic process made available in May 2006 replaces the need for these forms. Staff discontinued processing course evaluations in April 2003 due to budget shortages. Sections (3) and (4) are renumbered accordingly to (1) and (2).

---

**Justification for Amendments to Regulation 1058**

*1058(a) and (b):* To stress the fact that the information will reside in an electronic system, the words “relevant course” have been added.

---

**Justification for Amendments to Regulation 1070**

1070 (a) and 1070 (b): Signature is deleted because the system logon authenticates the user and that authentication represents the signature authority. The deleted and added language specifies the change from paper forms to an electronic system for reporting data.

---

**Additional Form Information**

POST has not previously incorporated the Course Announcement Change, POST 2-140 (3/03), form into regulations. As a point of information, the EDI Course Presentation screens will collect the same data, with one exception. Course presenters will report the information collected on the paper form in “Field #6. Description of Change” in the "Comments" section through the EDI System.

These forms will continue as paper forms until the EDI System is further developed:

Expanded Course Outline Exemption, POST 2-141 (07/05)

**INITIAL STATEMENT OF REASONS  
Electronic Course Certification Process  
Regulations 1053, 1054, 1055, 1058, and 1070**

Course Roster, POST 2-111 (Rev. 7/96)  
Training Reimbursement Request, POST 2-273 (Rev. 8/93)

---

**Significant Statewide Adverse Economic Impact Directly Affecting California Businesses, Including Small Business**

The Commission on Peace Officer Standards and Training has made an initial determination that the amended regulations will not have a significant statewide adverse economic impact directly affecting California businesses, including the ability to compete with businesses in other states. The Commission on Peace Officer Standards and Training has found that the proposed amendments will have no effect on California businesses, including small businesses, because the Commission sets selection and training standards for law enforcement and does not impact California businesses, including small businesses.

**Cost Impacts on Representative Private Persons or Businesses**

The Commission on Peace Officer Standards and Training is not aware of any cost impacts that a representative private person or business would necessarily incur in reasonable compliance with this proposed action.

**Assessment**

The adoption of the proposed regulation amendments will neither create nor eliminate jobs in the state of California, and will not result in the elimination of existing businesses or create or expand businesses in the State of California.

**Consideration of Alternatives**

To take this action, the Commission must determine that no reasonable alternative considered by the Commission, or otherwise identified and brought to the attention of the Commission, would be more effective in carrying out the purpose for which the action is proposed, or would be as effective as and less burdensome to affected private persons than the proposed action.