

**INITIAL STATEMENT OF REASONS
BOARD OF STATE AND COMMUNITY CORRECTIONS
MINIMUM STANDARDS FOR TRAINING
TITLE 15, DIVISION 1, CHAPTER 1, SUBCHAPTER 1**

California Penal Code sections 6035 and 6036 establish the Standards and Training for Corrections (STC) program for the purpose of raising the level of competence of local corrections and probation officers and other correctional personnel. They also charge the Board of State and Community Corrections (BSCC) to adopt, and from time to time amend, rules establishing minimum standards for the selection and training of these personnel employed by any city, county, or city and county who provide for the custody, supervision, treatment, or rehabilitation of persons accused of, or adjudged responsible for, criminal or delinquent conduct who are currently under local jurisdiction.

§ 171. Training Courses.

Section 171 provides a list of available training courses which are detailed in sections 173 through 184 of these regulations. For consistency, this section has been modified to include the newly proposed sections for transfer academies and update the number of available courses from seven, to 13. There is no anticipated operational or fiscal impact.

§ 173. Probation Officer Core Course.

Section 173 outlines the minimum requirements of the probation officer core course. The proposed revision reduces the required instruction hours from 196 to 189 to ensure staff proficiency and instruction of relevant course content. Reduction of instruction hours is based on a statewide job analysis of probation officer duties that was published by the BSCC in 2015. There is no anticipated operational or fiscal impact as the number of hours required is being reduced.

§ 173.1 Juvenile Corrections Officer to Probation Officer Transfer Academy.

Section 173.1 is proposed to outline the minimum requirements of the juvenile corrections officer to probation officer transfer academy. There are 71 hours of instruction covering specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the probation officer classification and is only available to staff who have successfully completed a full juvenile corrections officer core course. This new transfer academy was designed to ensure staff proficiency and is based on a 2015 statewide job analysis and comparison of the training requirements for the entry level juvenile corrections officer and probation officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 173.2 Adult Corrections Officer to Probation Officer Transfer Academy.

Section 173.2 is proposed to outline the adult corrections officer to probation officer transfer academy. There are 76 hours of instruction in specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the probation officer classification and is only available to staff who have successfully completed a full adult corrections officer core course. This new transfer academy was designed to ensure staff proficiency and is based on a 2015 statewide job analysis and a

comparison of the training requirements for the entry level adult corrections officer and probation officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 176. Juvenile Corrections Officer Core Course.

Section 176 outlines the minimum requirements of the juvenile corrections officer core course. The number of required instruction hours have been increased from 160 to 168 to ensure staff proficiency and instruction of relevant course content. Instruction hours are based on a statewide job analysis of the juvenile corrections officer duties that was conducted by the BSCC. Operational and fiscal impacts are anticipated to be minimal because there is a minimal change in hours.

§ 176.1 Probation Officer to Juvenile Corrections Officer Transfer Academy.

Section 176.1 is proposed to outline the probation officer to juvenile corrections officer transfer academy. There are 59 hours of instruction in specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the juvenile corrections officer classification and is only available to staff who have successfully completed a full probation officer core course. This new transfer academy was designed to ensure staff proficiency and is based on a 2015 statewide job analysis and a comparison of the training requirements for the entry level probation officer and juvenile corrections officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 176.2 Adult Corrections Officer to Juvenile Corrections Officer Transfer Academy.

Section 176.2 is proposed to outline the adult corrections officer to juvenile corrections officer transfer academy. There are 10 hours of on-the-job training in specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the juvenile corrections officer classification and is only available to staff who have successfully completed a full adult corrections officer core course. This new transfer academy was designed to ensure staff proficiency and is based on a 2015 statewide job analysis and a comparison of the training requirements for the entry level adult corrections officer and juvenile corrections officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 179. Adult Corrections Officer Core Course.

Section 176 outlines the minimum requirements of the adult corrections officer core course. The number of required instruction hours have been increased from 176 to 187 to ensure staff proficiency and introduce more current topics and classes. These changes were based on a statewide job analysis of the adult corrections officer duties that was conducted by the BSCC. Operational and fiscal impacts are anticipated to be minimal because there is a minimal change in hours.

§ 179.1 Probation Officer to Adult Corrections Officer Transfer Academy.

Section 179.1 is proposed to outline the probation officer to adult corrections officer transfer academy. There are 63 hours of instruction in specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of

proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the adult corrections officer classification and is only available to staff who have successfully completed a full probation officer core course. This new transfer academy was designed to ensure staff proficiency and is based on a 2015 statewide job analysis and a comparison of the training requirements for the entry level probation officer and adult corrections officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 179.2 Juvenile Corrections Officer to Adult Corrections Officer Transfer Academy.

Section 179.2 is newly proposed to outline the juvenile corrections officer to adult corrections officer transfer academy. There are 8 hours of on-the-job training in specific performance objectives. Transferring staff must successfully complete these course objectives as demonstrated by satisfactory level of proficiency on relevant achievement tests. Transfer academy shall be completed in the first year of employment in the adult corrections officer classification and is only available to staff who have successfully completed a full juvenile corrections officer core course. This new transfer academy was designed to ensure staff proficiency and based on a 2015 statewide job analysis and a comparison of the training requirements for the entry level juvenile corrections officer and adult corrections officer. Officers transferring between classifications are currently required to complete a full training academy instead of this proposed transfer academy; with the reduction in required hours of training for transfers there is no anticipated operational or fiscal impact.

§ 180. Adult Corrections Officer Supplemental Core Course.

Section 180 outlines the minimum requirements of the adult corrections officer supplemental core course. The number of required instruction hours have been increased from 56 to 79 to ensure staff proficiency and introduce more current topics and classes. These changes were based on a statewide job analysis of the adult corrections officer duties that was conducted by the BSCC. Operational and fiscal impacts are anticipated to be minimal because there is a minimal change in hours.

PURPOSE

Since Public Safety Realignment in 2011, local corrections and probation officers have been dealing with more complex populations of criminal justice-involved individuals. Local jails now house felons serving sentences that previously would have mandated state prison time. The number of mentally ill people in jails has increased, and probation officers are supervising and arranging suitable treatment and programming for individuals who were previously the responsibility of state parole agents. With new and complex jail and probation populations, duties of corrections and probation officers have changed; updated training requirements are necessary to prepare officers for challenges they face on the job.

Pursuant to Penal Code section 6035, the Board of State and Community Corrections is required to establish and periodically amend minimum standards for the training of local corrections and probation officers. The BSCC Board directed staff to conduct a review and revision of training standards under the leadership of an Executive Steering Committee (ESC) chaired by Board Member, and Nevada County Probation Chief, Michael Ertola. The purpose of the review was to revise the minimum training standards for entry level corrections personnel and ensure that local law enforcement agencies adequately prepare newly hired corrections staff to successfully perform their duties.

To assess the current need, the BSCC conducted a comprehensive survey to determine in which ways the knowledge, skills and abilities of local corrections and probation officers had adapted to handle the new population serving time under local supervision. The results informed a comprehensive look at the BSCC's core training program. At the direction of the ESC, 17 workgroups of subject-matter experts met to review and make recommendations for changes to the core training program. The workgroups included more than 200 representatives of entry-level staff, supervisors, managers and administrators from 53 counties, and were illustrative of the diversity of the state in location, size, and processes of local correctional agencies.

The proposed regulations reflect the work of the BSCC Board, ESC, workgroups, and BSCC staff to improve the safety and security of facility staff, offenders, and the community through updated and enhanced training.

PROBLEMS THIS PROPOSED REGULATION SEEKS TO ADDRESS

The proposed regulations seek to provide an updated curriculum for officers transferring between classifications and for all entry-level Probation Officers, Juvenile Corrections Officers, and Adult Corrections Officers to enhance their training and better prepare them for duties of the job. The job analysis identified significant overlap in the tasks performed by Probation Officer, Juvenile Corrections Officer, and Adult Corrections Officer classifications. This analysis provided support for abbreviated academies so that officers who have completed a full academy may transfer to one of the other classifications. Workgroups compared core content between classifications to identify areas of overlap in designing transfer academy requirements. This is particularly helpful for Probation Departments since many of the Probation Officer hires are from Juvenile Corrections Officer classifications.

BENEFITS ANTICIPATED FROM THE PROPOSED REGULATION

The BSCC anticipates several benefits from the proposed regulation revision, including:

- 1) Improved quality entry-level training, particularly in the content areas covered in the new classes and the expanded behavioral health topic.
- 2) Cost and time savings for agencies where transfers between classifications occur.
- 3) Enhanced officer and offender safety because of updated and enhanced training.
- 4) A reduction in training "gaps" as a result of a more recent job analysis.

TECHNICAL, THEORETICAL, AND/OR EMPIRICAL STUDY, REPORTS, OR DOCUMENTS.

Except for the technical analysis listed below, the BSCC did not rely upon any other technical, theoretical, or empirical studies, reports or documents in proposing the adoption of these regulations.

- Job Analysis: Adult Corrections Officer, Juvenile Corrections Officer, and Probation Officer, February 2015

REASONABLE ALTERNATIVES TO THE REGULATION AND THE AGENCY'S REASONS FOR REJECTING THOSE ALTERNATIVES.

No other alternatives were presented to or considered by the BSCC.

REASONABLE ALTERNATIVES TO THE PROPOSED REGULATORY ACTION THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS.

The BSCC has not identified any alternatives that would lessen any adverse impact on small businesses.

EVIDENCE SUPPORTING FINDING OF NO SIGNIFICANT STATEWIDE ADVERSE ECONOMIC IMPACT DIRECTLY AFFECTING BUSINESS.

The entry-level core academies are offered by local STC agencies (county corrections and probation departments) and private providers like community colleges. There are a few private training businesses that also currently offer these core academies. The impact of the revision would be that these private training providers would need to revise the core curriculum, which would include lesson plans plus training and testing materials. The periodic revision and update of training curriculum is an important “best practice” for all training providers, regardless of proposed regulation revisions.

ECONOMIC IMPACT ASSESSMENT

THE CREATION OR ELIMINATION OF JOBS WITHIN THE STATE OF CALIFORNIA

The BSCC has determined that the proposed amendments will not create or eliminate jobs within the state of California. The proposed amendments improve and enhance existing training requirements, ensuring officers receive a minimum number of hours for each classification and in transfer academies, and are only applicable to local city, county, or city and county agencies.

THE CREATION OF NEW BUSINESSES OR THE ELIMINATION OF EXISTING BUSINESSES WITHIN THE STATE OF CALIFORNIA

The BSCC has determined that the proposed amendments will not create new businesses or eliminate existing businesses within the state of California. The proposed amendments are only applicable to local city, county, or city and county agencies.

THE EXPANSION OF BUSINESSES CURRENTLY DOING BUSINESS WITHIN THE STATE OF CALIFORNIA

The BSCC has determined that the proposed amendments will not expand businesses currently doing business within the state of California. The proposed amendments are only applicable to local city, county, or city and county agencies.

BENEFITS OF THE REGULATIONS TO THE HEALTH AND WELFARE OF CALIFORNIA RESIDENTS, WORKER SAFETY, AND THE STATE’S ENVIRONMENT

The anticipated benefits from the proposed regulation adoption and amendment, include: Improved quality entry-level training, particularly in the content areas covered in the new classes and the expanded behavioral health topic; cost and time savings for agencies where transfers between classifications occur; enhanced officer and offender safety because of updated and enhanced training; and a reduction in training “gaps”.