

## Initial Statement of Reasons

### Certification Criteria for Self-Paced Training - Regulations 1001, 1015, 1018, 1052, 1053, 1055, 1056, and 1081 and Procedures D-2, E-1, F-1, and F-6

POST has been the leader in developing and delivering technology-based training for law enforcement in the form of telecourses, case law updates, digital video discs, interactive video discs, and CD-ROMs. However, POST did not immediately embrace the concept of Internet training because of the slow speed of computer modems and the inability of existing technology to deliver audio and video. With the rapid growth of high-speed modems, cable connections, digital media, and extremely fast computer systems, the work environment has changed and new training opportunities now exist. Agencies that used POST-developed multimedia training courses have transitioned to automation and computers. POST is moving to take advantage of these opportunities through self-paced training and instructor-lead training delivered via the Internet. The term used to define this training is Web-based Training (WBT).

Recommended amendments to POST regulations focus on the certification of self-paced training to include WBT, the non-reimbursable status for self-paced training, and the quality of self-paced training.

- As POST staff addressed the need for WBT certification, it became clear that the real issue was certification of any self-paced training proposed by presenters. These regulation changes provide direction for course certification of self-paced training, including WBT and CD-ROM training.
- Because there are no travel, lodging, or per diem expenses associated with self-paced training, POST will not reimburse agency presenters for self-paced training.
- Self-paced training certification provides an opportunity to “raise the bar” for training development and enhance the learning experience. Certification requirements for self-paced training include learning objectives that define the training requirements, learning activities to allow the student to meet the course objectives, and evaluations to determine if the student met the course objectives. The requirements for certifying self-paced training consider the relationship between learning objectives, learning activities, and student learning evaluations and are intentionally stricter than the requirements for certifying classroom training.

Two events further support the need to amend POST regulations to allow certification of self-paced training. In April 2004, the Commission approved the conversion of two POST CD-ROM courses to WBT. In June 2005, the Continuing Education Division of the Los Angeles Police Department expressed a desire to have POST certify WBT they are developing for in-service training. At its January 20, 2005 meeting, the Commission approved a proposal to amend Commission Regulations.

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#### Regulation 1001 Amendments

**Section (g)** adds the new definition of “Blended Learning” for clarity with its use in Regulation 1053 (a). Blended learning includes all delivery methods – classroom or other venue, and web-based. For clarity, skid pads, firing ranges, and gyms are examples of “other venue.”

The lettering of existing **sections (g) through (oo)**, inclusive, changes for alphabetical order consistency.

**Section (qq)** adds “Web-Based Training” for clarity with Regulations 1052 (a) and (b) and 1053 (b).

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#### Regulation 1015(c) (1) Amendments

Web-based (WBT) training becomes a reimbursement exception, and includes related grammar changes. Because there are no travel, lodging, or per diem expenses for WBT, there is no need for reimbursement.

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#### Regulation 1018 Amendments

The **section (a)** reference to 1001 (cc) is changed for consistency with Regulation 1001.

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### **Regulation 1052 Amendments**

**Section (a)** includes a category section title to distinguish it from new section (b). New language indicates that this section addresses instructor-led training and offers examples for clarity. POST is implementing two categories of training for purposes of POST certification: instructor-led training and self-paced training. Existing course evaluation factors and certification package requirements pertain to instructor-led training. The new category of training addresses self-paced methods of training.

**Section (b)** includes a section title and examples for clarity. The factors listed in items (1) through (10) establish clarity and consistency with the existing information given to potential course presenters in section (a). Sections (b) (1), (2), (6), and (7) factors are consistent with the existing evaluation factors stated for instructor-led training in section (a). Sections (b) (3), (4), (5) are unique to self-paced training. They specify time estimates rather than fixed time because the time needed to complete the self-paced course will vary by student. POST will continue to make the final decision regarding the number of course hours and the hours allowed for Continuing Professional Training credit. Sections (b) (8), (9), and (10) include course objectives, learning activities, and evaluation activities as factors POST will evaluate in a self-paced course. The requirement for course objectives, learning activities, and evaluation activities supports the POST long-term goal of improving the quality and impact of training for California law enforcement as stated in POST Strategic Plan Section B. POST requires learning objectives and activities for basic course certification.

**Sections (b) through (h)** change to (c) through (i), respectively, for consistency with the outline format and includes changes for grammar accuracy.

**Section (bc)** adds a reference to new section (b), for consistency. An academy that uses self-paced training to deliver parts of basic training must submit the information required in section (b).

**Section (hi)** removes the reference to classroom training and makes two grammar changes, for accuracy. The use of audio-visual training materials is no longer limited to the classroom.

**Section (hi) (1)** adds various digital media to the list of audio-visual training material, in alphabetical order, that POST will review, for clarity and completeness, and one grammatical change.

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### **Regulation 1053 Amendments**

New terms establish two categories of training for the purpose of course certification. One category is Instructor-led training; any self-paced training course or self-paced portion of a training course is the second category. The new term “Blended Learning” (Regulation 1001 (g) describes a course that incorporates instructor-led and self-paced methods in one course.

A course presenter who incorporates self-paced training into an otherwise instructor-led course must submit *two* certification requests. Each course type (instructor-led or self-paced) will receive a separate course control number. Completion of both courses will be required for course credit. If a course is not instructor-led, it is self-paced. If the training is instructor-led, section (a) certification requirements apply. If the training is self-paced, section (b) certification requirements apply.

The topic lead and subsequent language, moved from section (a), become the introductory language, because the rule will apply to both sections (a) and new section (b), for clarity and consistency.

**Section (a)** has a new topic lead and introductory sentence to clarify that section (a) addresses instructor-led training only and to distinguish it from new section (b) that addresses self-paced training.

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**Section (a) (2)** includes grammar and wording consistency changes. In particular, the word resume is a verb; while résumé is the noun that refers to an individual's summary of qualifications. Because the form content will not change, the form date will remain the same.

**Section (a) (3)** reflects a grammar change for consistency.

**Section (a) (4)** is expanded to include an outline sample to the third level of detail, for clarity. This shows course presenters the level of detail POST needs in the course-certification request package and assists POST in obtaining complete documents, thus streamlining the efforts needed by the requestor and POST to accomplish course certification.

**Section (a) (7)** is corrected to use the word "attestation" for consistency with the Instructor Résumé form; by his/her signature the presenter is attesting that the instructor meets certain requirements, and includes grammar changes for clarity.

**Section (b)** includes a topic lead and introductory sentence to clarify that section (b) addresses self-paced training only, to distinguish it from section (a) that addresses instructor-led training, and includes examples for clarity. As new training technology is developed, what constitutes a self-paced training component will expand and/or replace existing technology.

**Section (b) (1)** includes a Self-Paced Training Course Certification Request form that is specific to self-paced training. Like the existing Course Certification Request (POST 2-103), the new form allows POST to collect needed information and establishes consistency with course certification requirements. The new form requires the same information as the existing course certification form when appropriate or asks for information specific to self-paced training. For example, information related to a physical facility used for traditional classroom training is not included on the new form, but student access, rather than instructor-led access, to a Web address or CD-ROM relates to self-paced training. The information required in field #9 of the form is included for clarity and pertains to Regulation 1081(a), which specifies that students who complete legislative mandates via technology-based delivery will receive credit for the same course hours credited for training in a traditional instructor-led course. Information collected about POST Mandates and Perishable Skills topics helps POST decide hours of credit, per Regulation 1005 (d) (4) and (5). The requirement for information about course objectives, learning activities, and evaluation activities supports the long-term goal of POST to improve the quality and impact of training for California law enforcement as stated in Section B of the POST Strategic Plan. POST currently requires learning objectives and activities for basic course certification. The requirements for certifying self-paced training are intentionally stricter than the certification requirements for classroom training.

**Section (b) (2)** includes a new Course Developer Résumé, POST 2-125, that collects much of the same information or type of information as the existing Instructor Résumé (POST 2-112). The course developer résumé addresses course developer training, experience, and education. When a self-paced training course includes a specialized training subject, the course presenter must complete "Section 7: Presenter Evaluation – Specialized Subjects Only" for at least one course developer of any of the specialized training subjects listed in Regulation 1070. The course presenter must also attest by signature that the presenter evaluated the developer's qualifications and found them to meet the instructor training requirements specified in Regulations 1070 and 1082. Compliance with this requirement helps determine qualifications, maintains the integrity of specialized training subject courses, and establishes consistency with existing POST requirements.

**Section (b) (3)** language gives POST access to the web-site location and other resources a student may access. POST can review the proposed course before recommending approval / disapproval for course certification, consistent with the requirement to review proposed aspects of a classroom-based course.

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**Section (b) (4)** specifies the submission of an expanded course outline, to the fourth level of detail, for web-based training, consistent with existing POST requirements for instructor led training. An outline sample to the fourth level of detail will assist the requesting course presenter in distinguishing a fourth-level outline versus the third level outline required for classroom training that is specified in Regulation 1053(a), for clarity. This shows course presenters the level of detail POST needs in the course-certification request package and assists POST in obtaining complete documents, thus streamlining the efforts needed by the requestor and POST to accomplish course certification. Self-paced training certification requirements include course objectives to define the training requirements; learning activities and related objectives to reinforce instruction, allow the student to meet the objectives, and provide a challenge and interest to the student; and evaluations to determine if the student met the objectives. Establishing course objectives, learning activities, and evaluation activities supports the POST long-term goal of improving the quality and impact of training for California law enforcement as stated in Section B of the POST Strategic Plan. The requirements for certifying self-paced training are intentionally stricter than the certification requirements for classroom training. POST basic training currently includes learning activities as an integral part of its training.

**Sections (b) (5) and (6)** require time estimates because the time needed to complete a self-paced course will vary by student, while the time in an instructor-led course is fixed. The instructor controls the start and finish of each class day, the classroom hours, breaks, and lunch hour. POST will continue to make the final decision regarding the number of hours allowed for course credit, and the number of hours allowed for Continuing Professional Training (CPT) credit. A review of the topics to be covered will assist in this determination. The hours approved for each item may be the same or they may vary because some training that benefits the trainee (i.e., agency-specific training) does not qualify for CPT credit.

**Section (b) (7)** is consistent with course certification requirements for instructor-led training in (a) (7).

**Sections (b) and (c)** will become (c) and (d), respectively, for consistency with the outline format, to accommodate new additional certification requirements.

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#### **Regulation 1055 Amendments**

The **section (h)** reference to 1001 changes for consistency with Regulation 1001 re-lettering.

**Section (j)** adds a reference to new section (b), for consistency. A presenter must keep on file the documents required by regulation 1053 whether the course is instructor-led or self-paced training.

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#### **Regulation 1056 Amendments**

The amendments delete reference to interactive videodisc training courses because self-paced training delivered via the Web and CD-ROM has replaced it. They also move the parenthetical reference to telecourses to a new sentence in the same paragraph, and add a new sentence with the collective term “POST-developed multimedia training courses,” for clarity. CD-ROM and Web-based training are included in the provision for automatic recertification because a Course Certification Report is not relevant to these courses. Course Certification Reports state the number of course presentations. That information is not germane to POST developed self-paced training since the courses are available directly to the students on a 24/7 basis. The amendments delete the parentheses and “See” as unnecessary.

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#### **Regulation 1081 Amendments**

**Sections (a), (a) (22), and (g)** changes are consistent with Regulation 1001, and include grammar changes.

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The effective date of the proposed changes will be added to the incorporation by reference statements for historical accuracy.

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**Commission Procedure D-2**

The **Section 2-4.** reference to 1052(d) is changed for consistency with Regulation 1052 changes.

The effective date of the proposed changes will be added to the incorporation by reference statements for historical accuracy.

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**Commission Procedure E-1**

**Section 1.4(a) (5)** reference to 1001 is changed for consistency with Regulation 1001 changes.

**Section 1.4(a) (8)** reference to 1001 is changed for consistency with Regulation 1001 changes.

The effective date of the proposed changes will be added to the incorporation by reference statements for historical accuracy.

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**Commission Procedure F-1**

**Sections 1-8, 1-9, and 1-10** references to Regulation 1001 change for consistency with 1001 changes.

The effective date of the proposed changes will be added to the incorporation by reference statements for historical accuracy.

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**Commission Procedure F-6**

**Section 6-2.** reference to 1001 is changed for consistency with Regulation 1001 changes.

The effective date of the proposed changes will be added to the incorporation by reference statements for historical accuracy.

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

The Commission 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 POST has found that the proposed amendments will have no affect on California businesses, including small businesses, because the Commission sets selection and training standards for law enforcement and does not have an impact on California businesses, including small businesses.

**Consideration of Alternatives**

Before the Commission takes this action, it must determine that no reasonable alternative it has considered, or that is otherwise identified and brought to the Commission's attention, would be more effective in carrying out the purpose of the proposed action, or would be as effective as and less burdensome to affected private persons than the proposed action.