



Education Interim Committee
65th Montana Legislature

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PAD MCCRACKEN, Lead Staff
LAURA SANKEY, Staff Attorney
JENNI CARR, Secretary

TO: Education Interim Committee (EDIC)
FROM: Pad McCracken, Committee Staff
RE: Accreditation Standards, Economic Impact Statements, and EDIC role
DATE: June 1, 2018

Pursuant to 20-7-101, MCA, prior to adoption or amendment of any accreditation standard by the Board of Public Education, the Education Interim Committee has an opportunity to review the proposal and an economic impact statement and make a determination as to whether the costs of the proposal will involve “insubstantial expenditures that can be readily absorbed into the budgets of existing district programs.”

If the committee does not make that determination, the Board is prohibited from implementing the new or amended standard until July 1 following the next regular legislative session and must seek funding for the proposal from the Legislature. Only if the committee makes an official determination that the costs will be insubstantial is the Board allowed to implement the new or amended standard sooner.

20-7-101. Standards of accreditation. (1) Standards of accreditation for all schools must be adopted by the board of public education upon the recommendations of the superintendent of public instruction. The superintendent shall develop recommendations in accordance with subsection (2). The recommendations presented to the board must include an economic impact statement, as described in 2-4-405, prepared in consultation with the negotiated rulemaking committee under subsection (2).

(2) The accreditation standards recommended by the superintendent of public instruction must be developed through the negotiated rulemaking process under Title 2, chapter 5, part 1. The superintendent may form a negotiated rulemaking committee for accreditation standards to consider multiple proposals. The negotiated rulemaking committee may not exist for longer than 2 years. The committee must represent the diverse circumstances of schools of all sizes across the state and must include representatives from the following groups:

- (a) school district trustees;
- (b) school administrators;
- (c) teachers;
- (d) school business officials;

(e) parents; and

(f) taxpayers.

(3) Prior to adoption or amendment of any accreditation standard, the board shall submit each proposal, including the economic impact statement required under subsection (1), to the education interim committee for review at least 1 month in advance of a scheduled committee meeting.

(4) Unless the expenditures by school districts required under the proposal are determined by the education interim committee to be insubstantial expenditures that can be readily absorbed into the budgets of existing district programs, the board may not implement the standard until July 1 following the next regular legislative session and shall request that the same legislature fund implementation of the proposed standard.

(5) Standards for the retention of school records must be as provided in 20-1-212.

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Negotiated Rulemaking Committee for Suicide Prevention and Response

Economic Impact Statement

**for implementation of a proposed
New Rule/Rule Amendment of Administrative
Rules of Montana (ARM) pertaining to
Suicide Prevention and Response**

January 2018

Economic Impact Statement for Suicide Prevention and Response

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Economic Impact Statement for Suicide Prevention and Response

Executive Summary

Using the negotiated rulemaking process, Superintendent of Public Instruction Arntzen has developed recommendations for accreditation standard changes pertaining to suicide prevention and response. The accreditation standard relates to the enactment of HB 381 from the 2015 Legislative session that added language to §20-1-1310, MCA, indicating that “(t)he trustees of a school district shall establish policies, procedures, or plans related to suicide prevention and response.” Based on that legislative action, the State Superintendent initiated the process for amending the accreditation standard to specifically recognize that new requirement.

In January 2018, the Montana Office of Public Instruction (OPI) surveyed school personnel and stakeholders about the probable economic impact of the proposed new rule/rule amendment for ARM 10.55 on challenges of implementation, district resources, personnel, professional development, and overall impact. Survey results show no indication that this new rule/rule amendment would create a significant economic impact for districts and their schools. *It is important to note that the proposed new rule/rule amendment and the legislation it is based upon simply require local school districts to adopt a policy, procedure, or plan addressing suicide prevention and response. The decision as to how many resources, fiscal or otherwise, to allocate toward the implementation of those policies, procedures, or plans will be left to the discretion of local school districts.*

The OPI provides guidance, training, and technical assistance to Montana schools on youth suicide awareness, prevention, and response from several divisions in the agency, including Health Enhancement, Indian Education, Special Education, and Educational Opportunity and Equity. These divisions provide training materials that meet the requirements for professional development and periodically review the materials. Partnerships have been developed with a vast array of organizations throughout the state. These partnerships provide educational opportunities and technical assistance, including the OPI Teacher Learning Hub online courses, the Department of Public Health and Human Services’ Signs of Suicide Programs (SOS), and the Jason Flatt Foundation. An extensive list of resources, including vital education and opportunities for schools, students, and parents, can be found on the [OPI Suicide Prevention website](#).

Based on the analysis of the survey results and the advice of the negotiated rulemaking committee, the OPI has concluded that school district expenditures are insubstantial under the proposed new rule/rule amendment and expenditures can be readily absorbed into the budgets of existing district programs.

Economic Impact Statement for Suicide Prevention and Response

Introduction

In 2015, the Montana Legislature (“Legislature”) enacted the “Suicide Awareness and Prevention Act” that required the OPI to provide training, guidance, and technical assistance to Montana schools regarding suicide awareness and prevention (§20-7-1310, MCA). In accordance with that act, the OPI has been focusing on and supporting evidence-based practices and offering districts technical assistance to build district-wide systems of support. Important laws that address suicide prevention and response in schools are now included on the OPI website along with resources to determine appropriate suicide prevention and response at school and in the home. Sample policies and procedures for best practice suicide prevention and response programs are also provided on the website.

In 2017, however, the Legislature amended the “Suicide Awareness and Prevention Act” to require that local school district trustees “establish policies, procedures, or plans related to suicide prevention and response.” Based on that legislative action, the State Superintendent has initiated the process for amending the accreditation standards to specifically recognize that new requirement. Proposed changes to the accreditation standards require that the State Superintendent establish an independent negotiated rulemaking committee (“Committee”) under §20-1-701, MCA. Superintendent Arntzen selected 16 members to serve on that Committee in accordance with §20-1-701(2), MCA.

That Committee completed its work and reached consensus on proposed language for amending the accreditation standards to recognize the new legislative requirement, and a copy of that proposed language is attached. (See [Attachment A](#)). As required by §20-7-101(1), MCA, the State Superintendent has prepared, in consultation with the Committee, this economic impact statement under the provisions of §2-4-405, MCA. Each of the elements required to be addressed in the economic impact statement are outlined below.

Affected Classes of Persons

Describe the classes of persons who will be affected by the proposed rule including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule. Refer to §2-4-405 (2)(a), MCA.

The *classes of persons* affected by the proposed new rule/rule amendment include individuals from the following groups: school district trustees, K-12 school administrators, K-12 teachers and counselors, school business officials, parents, and taxpayers. Members of the Committee *for developing the proposed new rule/rule amendment language* were selected based on the following criteria: cultural diversity, geography, suicide prevention experience, district and school size, and grade levels served.

Costs associated with the proposed new rule/rule amendment are the responsibility of local school districts. The beneficiaries of the proposed new rule/rule amendment are students, educators, and employees of local school districts as well as Montana communities served by accredited school

Economic Impact Statement for Suicide Prevention and Response

districts. The proposed new rule/rule amendment will help students, educators, parents, and communities to work toward increased awareness and more effective prevention of and response to suicide.

Economic Impact

Describe the probable economic impact of the proposed rule upon affected classes of persons including but not limited to providers of services under contracts with the state and affected small businesses, and quantifying, to the extent practicable, that impact. Refer to §2-4-405 (2)(b), MCA.

The OPI surveyed school personnel and stakeholders about the probable economic impact of the proposed new rule/rule amendment for ARM 10.55 between January 12, 2018, and January 23, 2018. The survey was individually emailed to approximately 125 stakeholders and sent to 1,664 recipients through the OPI bulk email system. Thirty-eight responses were received.

Twenty respondents (53 percent) indicate that their school district policies DO include a policy addressing suicide prevention; 13 respondents (34 percent) indicate that their school district policies DO NOT include a policy addressing suicide prevention; five respondents (13 percent) are unaware whether their school district has implemented a policy.

Twenty-one respondents (53 percent) indicate that their school district policies DO include a policy addressing suicide response; 11 respondents (29 percent) indicate that their school district policies DO NOT include a policy addressing suicide response; 6 respondents (16 percent) are unaware whether their school district has implemented a policy.

Overall, the survey data show no indication that this new rule/rule amendment would create a significant economic impact for districts and their schools. It is important to note that the proposed new rule/rule amendment and the legislation it is based upon simply require local school districts to adopt a policy, procedure, or plan addressing suicide prevention and response. The decision as to how many resources, fiscal or otherwise, to allocate toward the implementation of those policies, procedures, or plans will be left to the discretion of local school districts.

Cost to State Agencies

Describe and estimate the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue. Refer to §2-4-405 (2)(c), MCA

The OPI, in accordance with §20-7-101, MCA, has incurred costs associated with the negotiated rulemaking process including contracting with a facilitator and convening the rulemaking committee. The OPI also pays for notices of rulemaking and corresponding publication notices with the Montana Office of Secretary of State. The OPI does not anticipate any additional costs associated with the accreditation of schools. The new standards will be incorporated into the OPI's accreditation review process within the existing budget of the OPI. Total cost to the OPI is approximately \$6,000.

Economic Impact Statement for Suicide Prevention and Response

The Board of Public Education is responsible for the notices of adoption of the new rule/rule amendment and the publication of notices with the Secretary of State (\$60 per page). The costs associated with board member attendance at public hearings will be paid within the existing budget of the Board of Public Education.

The OPI provides guidance, training, and technical assistance to Montana schools on youth suicide awareness, prevention, and response from several divisions in the agency, including Health Enhancement, Indian Education, Special Education, and Educational Opportunity and Equity. These divisions provide training materials that meet the requirements for professional development and periodically review the materials. Partnerships have been developed with a vast array of organizations throughout the state. These partnerships provide educational opportunities and technical assistance, including the OPI Teacher Learning Hub online courses, the Department of Public Health and Human Services' Signs of Suicide Programs (SOS), and the Jason Flatt Foundation. An extensive list of resources, including vital education and opportunities for schools, students, and parents, can be found on the [OPI Website](#).

Cost and Benefits of the Proposed Rule

Analyze and compare the costs and benefits of the proposed rule to the costs and benefits of inaction. Refer to §2-4-405 (2)(d), MCA.

Action on this topic is required by the Legislature's directive in HB 381, as codified in §20-1-1310, MCA. In 2017, the Legislature amended the "Suicide Awareness and Prevention Act" to require that local school district trustees "establish policies, procedures, or plans related to suicide prevention and response." Based on that legislative action, the State Superintendent has initiated the process for amending the accreditation standards to specifically recognize that new requirement and the proposed new rule/rule amendment fulfills that requirement. Accordingly, the agency did not undertake any analysis of the costs and benefits of "inaction."

As indicated above, the survey data show no indication that this new rule/rule amendment would create a significant economic impact for districts and their schools.

The Summary of Survey Responses (Attachment B) addresses five areas of potential economic impact on school district operations and budgets.

Less Costly or Less Intrusive Methods

Are there less costly or less intrusive methods for achieving the purpose of the proposed rule? Refer to §2-4-405 (2)(e), MCA.

As indicated above, the purpose of the proposed new rule/rule amendment is to incorporate the Legislature's directive from HB 381 into the accreditation standards. Because the language of the proposed new rule/rule amendment mirrors that of HB 381, there is no less costly or less intrusive method for achieving the purpose of the proposed new rule/rule amendment.

As also indicated above, the cost for implementation will vary by district based on choices made by individual school boards regarding the needs of their schools and local communities. The act of

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simply adopting a policy, procedure, or plan will, in and of itself, carry a minimal cost.

Selection of Proposed Rule

Analyze any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule. Refer to §2-4-405 (2)(f), MCA.

The agency did not seriously consider alternative methods for achieving the purpose of the proposed rule because the purpose of the proposed new rule/rule amendment is to incorporate a specific legislative directive into the accreditation standards.

Efficient Allocation of Public and Private Resources

Does the proposed rule represent an efficient allocation of public and private resources? Refer to §2-4-405 (2)(g), MCA.

Neither the proposed new rule/rule amendment nor the legislation it is based upon involve any specific allocation of public and private resources. The agency is hopeful, however, that the Legislature's initiative in passing HB 381, and all of the public attention and effort that will go into the implementation of a new accreditation standard and subsequent actions by local school boards, will create opportunities for more efficient allocation of resources toward the subject of suicide prevention and response.

Data Gathering and Analysis

Quantify or describe the data upon which the economic impact statement was based and an explanation of how the data was gathered. Refer to §2-4-405 (2)(h), MCA.

[Attachment B](#) is the summary of the economic impact survey results.

Applicable Statute

2-4-405, MCA. Economic impact statement. (1) Upon written request of the appropriate administrative rule review committee based upon the affirmative request of a majority of the members of the committee at an open meeting, an agency shall prepare a statement of the economic impact of the adoption, amendment, or repeal of a rule as proposed. The agency shall also prepare a statement upon receipt by the agency or the committee of a written request for a statement made by at least 15 legislators. If the request is received by the committee, the committee shall give the agency a copy of the request, and if the request is received by the agency, the agency shall give the committee a copy of the request. As an alternative, the committee may, by contract, prepare the estimate.

(2) Except to the extent that the request expressly waives any one or more of the following, the requested statement must include and the statement prepared by the committee may include:

- (a) a description of the classes of persons who will be affected by the proposed rule,

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including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule;

(b) a description of the probable economic impact of the proposed rule upon affected classes of persons, including but not limited to providers of services under contracts with the state and affected small businesses, and quantifying, to the extent practicable, that impact;

(c) the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue;

(d) an analysis comparing the costs and benefits of the proposed rule to the costs and benefits of inaction;

(e) an analysis that determines whether there are less costly or less intrusive methods for achieving the purpose of the proposed rule;

(f) an analysis of any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule;

(g) a determination as to whether the proposed rule represents an efficient allocation of public and private resources; and

(h) a quantification or description of the data upon which subsections (2)(a) through (2)(g) are based and an explanation of how the data was gathered.

(3) A request to an agency for a statement or a decision to contract for the preparation of a statement must be made prior to the final agency action on the rule. The statement must be filed with the appropriate administrative rule review committee within 3 months of the request or decision. A request or decision for an economic impact statement may be withdrawn at any time.

(4) Upon receipt of an impact statement, the committee shall determine the sufficiency of the statement. If the committee determines that the statement is insufficient, the committee may return it to the agency or other person who prepared the statement and request that corrections or amendments be made. If the committee determines that the statement is sufficient, a notice, including a summary of the statement and indicating where a copy of the statement may be obtained, must be filed with the secretary of state for publication in the register by the agency preparing the statement or by the committee, if the statement is prepared under contract by the committee, and must be mailed to persons who have registered advance notice of the agency's rulemaking proceedings.

(5) This section does not apply to rulemaking pursuant to 2-4-303.

(6) The final adoption, amendment, or repeal of a rule is not subject to challenge in any court as a result of the inaccuracy or inadequacy of a statement required under this section.

(7) An environmental impact statement prepared pursuant to 75-1-201 that includes an analysis of the factors listed in this section satisfies the provisions of this section.

Attachment A—Proposed New Rule/Rule Amendment

Proposed Amendment Language

10.55.701 BOARD OF TRUSTEES

(1) The local board of trustees shall ensure that the school district complies with all local, state, and federal laws and regulations.

(2) Each school district shall make available to the staff and public:

PROPOSED AMENDMENT: a policy, procedure, or plan addressing suicide prevention and response as outlined in ARM NEW RULE.

Proposed New Rule Language

NEW RULE: SUICIDE PREVENTION AND RESPONSE

(1) A local board of trustees shall establish policies, procedures, or plans related to suicide prevention and response that may include the following recommended elements:

(a) Promotes collaboration with families and with community providers in all aspects of suicide prevention and response;

(b) Implements a prevention and response program that is effective in reaching students, staff and parents using resources required of the Office of Public Instruction under MCA 20-7-1310;

(c) Includes high quality intervention services for students;

(d) Promotes interagency cooperation that enables school personnel to identify and access appropriate community resources for use in times of crisis;

(e) Includes reintegration of youth into a school following a crisis, hospitalization or residential treatment;

(f) Provides for leadership, planning, and support for students and school personnel to ensure appropriate responses to attempted or completed suicides;

(g) Ensures regular evaluation and revision of the policy and procedures.

(2) The term “response” includes both immediate response and postvention guidelines.

Attachment B—Summary of Economic Impact Survey Responses

Suicide Prevention and Response

Between January 12-23, 2018, the OPI distributed a questionnaire to survey school personnel and stakeholders about the probable economic impact of the proposed new rule/rule amendment. The survey was individually emailed to approximately 125 stakeholders and sent to 1,664 recipients through the OPI bulk email system.

Thirty-eight questionnaires were completed and this attachment provides a summary of the data received in those responses. A results report containing all data received can be found on the [OPI Montana Suicide Prevention and Response Negotiated Rulemaking Committee website](#).

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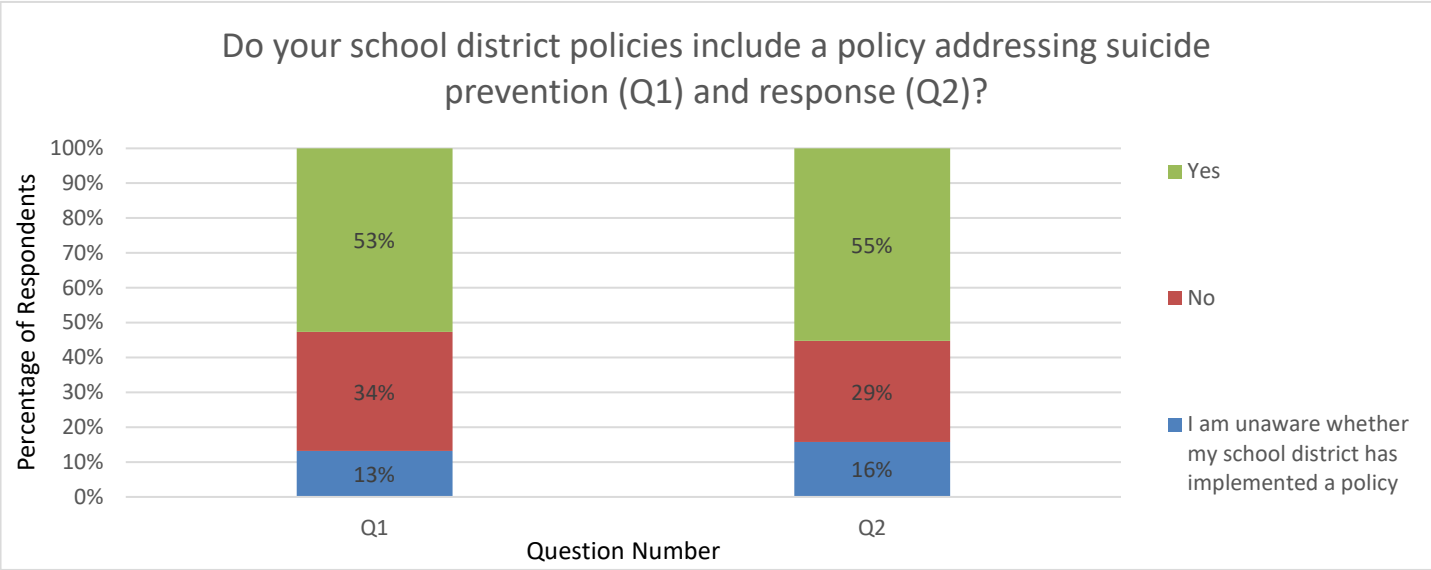
SURVEY QUESTIONS

Q1	Do your school district policies include a policy addressing suicide prevention?
Q2	Do your school district policies include a policy addressing suicide response?
Q3-13	Please indicate below which <i>challenges</i> your district is likely to face under the proposed new rule/rule amendment to the standard.
Q3	Difficulty finding OPI online training resources
Q4	Difficulty using OPI online training resources
Q5	Shortage of P-12 licensed employees trained in suicide prevention
Q6	Shortage of P-12 licensed employees trained in suicide response
Q7	Shortage of P-12 classified employees trained in suicide prevention
Q8	Shortage of P-12 classified employees trained in suicide response
Q9	Availability of professional development in suicide prevention
Q10	Availability of professional development in suicide response
Q11	Resources to support P-12 students
Q12	Resources to support P-12 licensed employees
Q13	Resources to support P-12 classified employees
Q14	Other challenges (please list)
Q15	Would the proposed new rule/rule amendment impact your <i>resources</i> budget?
Q16	Does your district use the suicide prevention and response training resources available on the OPI website?
Q17	What other suicide prevention and response training resources does your district use?
Q18	If additional resource expenditures are required, what increase in actual dollars would be required to cover the costs?
Q19	What new purchases would be needed for resources?
Q20	Would the proposed new rule/rule amendment impact your <i>personnel</i> budget?
Q21	If additional personnel development expenditures are required, what increase in actual dollars would be required to cover the costs?
Q22	What new purchases would be needed for personnel?
Q23	Would the proposed new rule/rule amendment impact your <i>professional development</i> budget?
Q24	If additional professional development expenditures are required, what increase in actual

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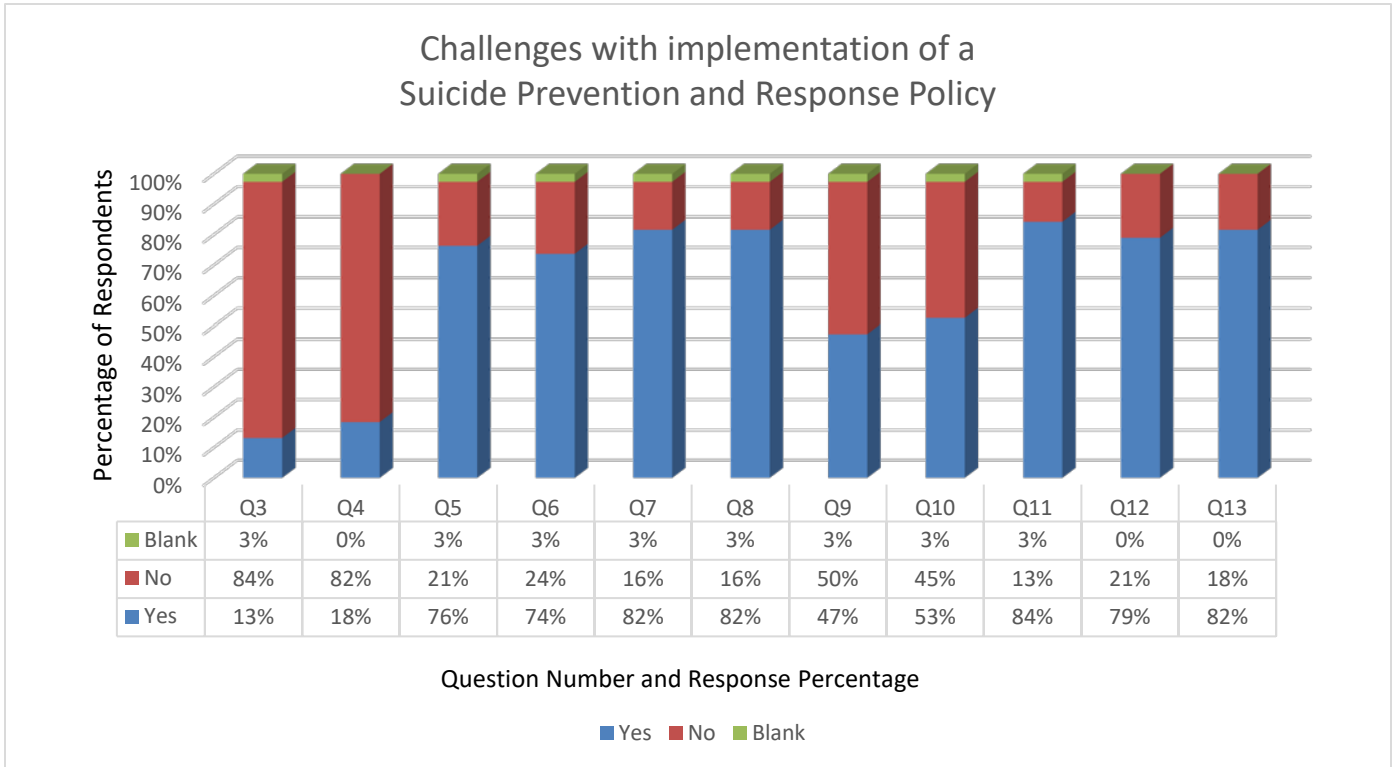
	dollars would be required to cover the costs?
Q25	What new purchases would be needed for professional development?
Q26	How many licensed employees would need this professional development?
Q27	How many classified employees would need this professional development?
Q28	How many hours of professional development would be needed for each employee?
Q29	Would the proposed new rule/rule amendment impact your <i>overall</i> budget?
Q30	If additional overall expenditures are required, what increase in actual dollars would be required to cover the costs?
Q31	What new purchases would be needed overall?
Q32	Is there anything else you believe OPI should consider in determining a fiscal impact for a proposed new rule/rule amendment to require local school district implementation of a policy on suicide prevention and response?

INTRODUCTION



Survey questions 1 and 2 address the respondent’s knowledge of existing policies on suicide prevention and response in their school districts. The data points were separated to assess individual responses regarding both suicide prevention and suicide response. Over half of respondents indicate that their school district policies already include a policy for both suicide prevention and suicide response, while between 13-16 percent of respondents are unaware whether their school district policies include a policy addressing either suicide prevention or suicide response. Approximately 30 percent of respondents indicate that their school district policies do not already include a policy for either suicide prevention or suicide response.

CHALLENGES WITH IMPLEMENTATION OF A SUICIDE PREVENTION AND RESPONSE POLICY



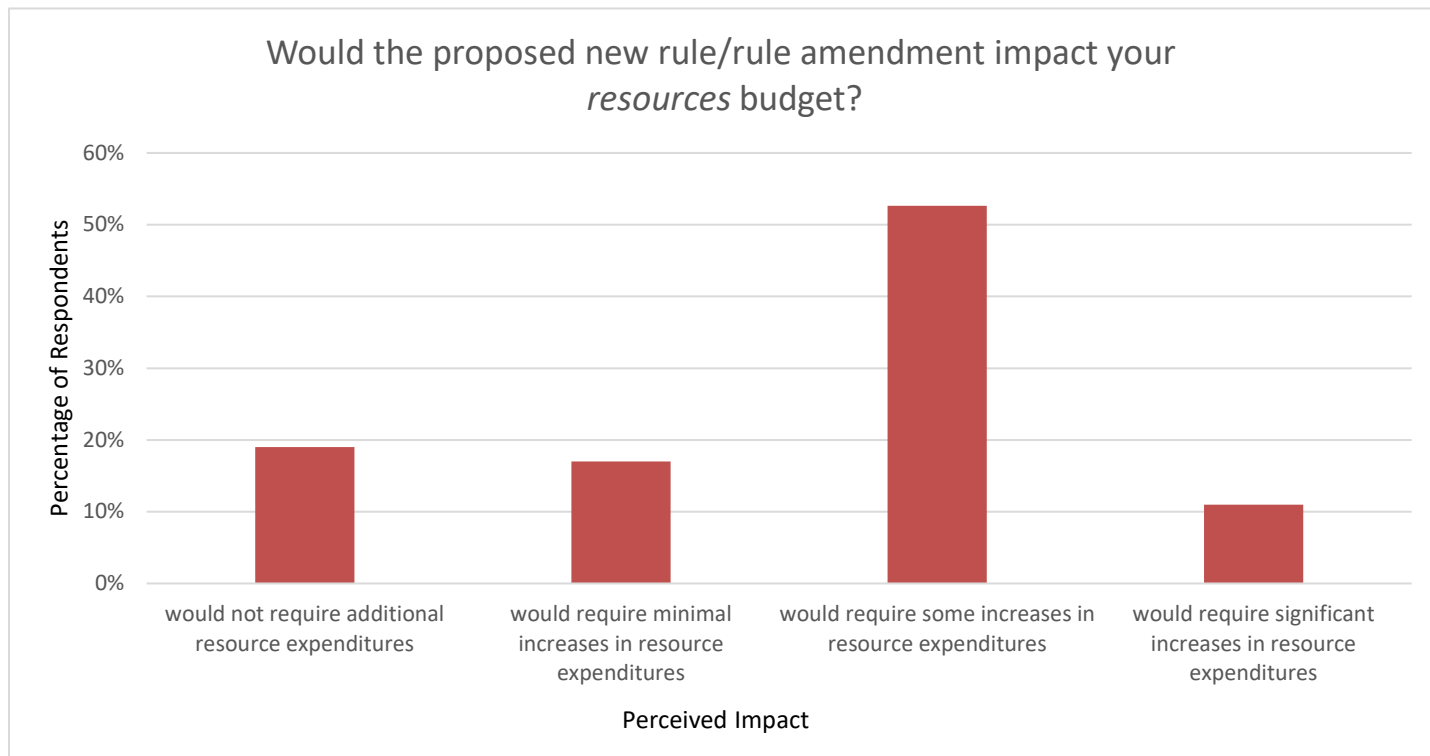
Based upon the prompt below, questions 3-14 address the perceived challenges respondents feel school districts would face under the proposed new rule/rule amendment.

“The OPI provides online training resources here: <http://opi.mt.gov/Educators/School-Climate-Student-Wellness/Suicide-Prevention>.

Please indicate below which challenges your district is likely to face under the proposed new rule/rule amendment to the standard.”

Question 14 provides respondents an opportunity to list other challenges in an open-ended format. Respondents perceive that finding and using the OPI online training resources will pose very little challenge for their districts. Participants perceive a shortage of both licensed and classified employees who are trained in both prevention and response will pose a challenge for their districts. Survey participants perceive that there is a significant shortage of resources to support both students and staff. Time, training, funding, and rurality of districts are among the other perceived challenges survey participants listed in question 14.

RESOURCES



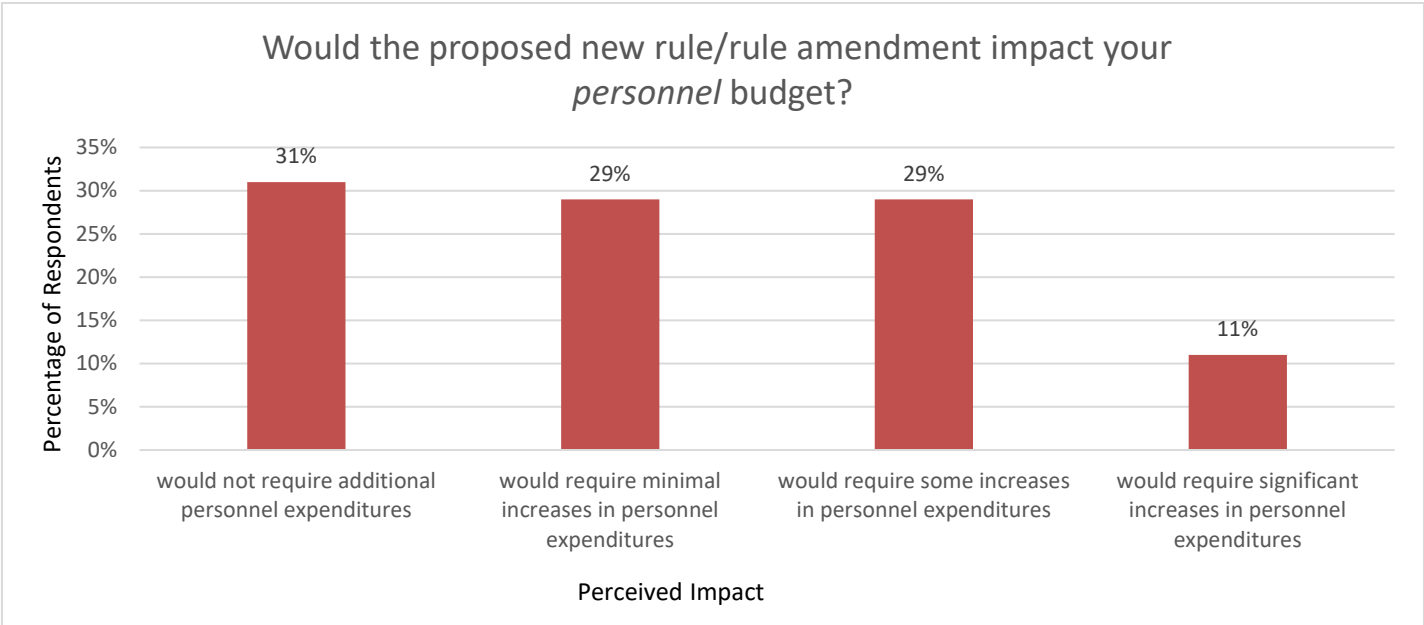
Questions 15 through 19 address the perceived impact the proposed new rule/rule amendment would have on a district’s *resources* budget. Over half of the respondents perceive that there would be some or minimal additional resource expenditures required in the implementation of the new rule/rule amendment, while only 11 percent perceive a significant increase in resource expenditures. 19 percent of respondents perceive that there would be no additional resource expenditures required.

Over half of the respondents indicate that their district uses existing OPI or other resources and list established programs (SOS, QPR, ASIST, YAM, Talk Saves Lives), in-school counselors or local licensed clinical professionals, webinars, and OPI staff as other resources used in districts.

Respondents indicate a variety of perceived costs for additional resources, from no or unknown cost to \$25,000, and list training and materials, staff development and in-service, and the cost of time as actual purchases that would be needed for implementation.

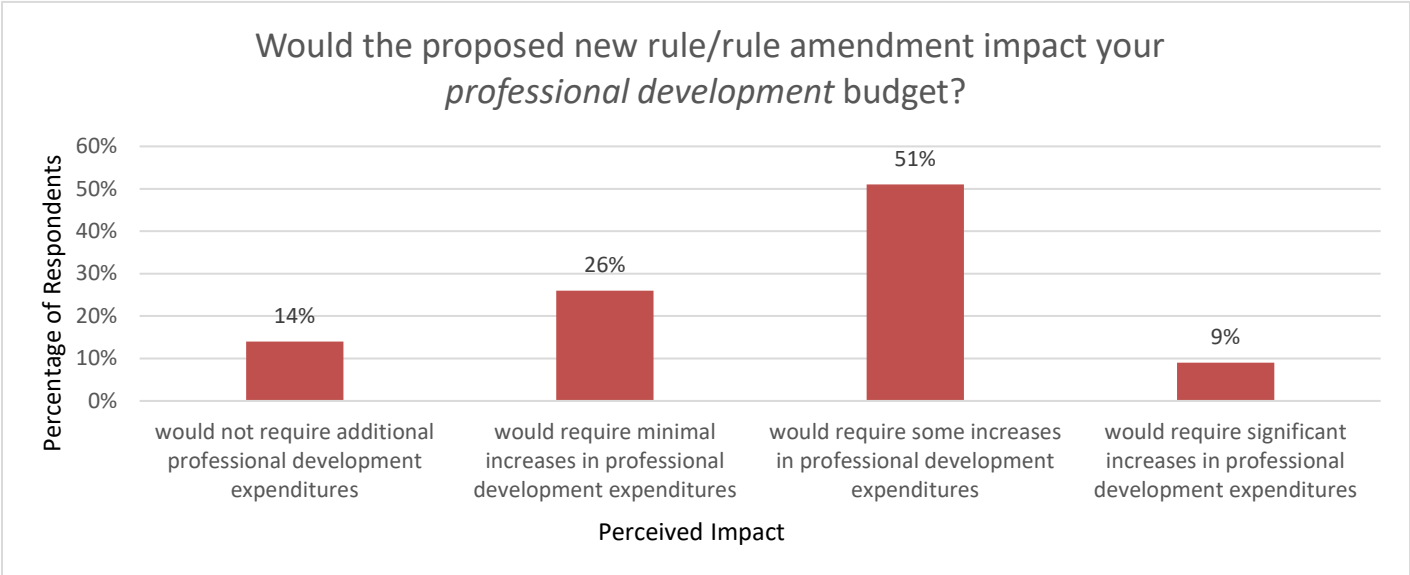
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PERSONNEL



Questions 20 through 22 address the perceived impact the proposed new rule/rule amendment would have on a district’s *personnel* budget. Over half of the respondents perceive minimal to some personnel expenditure increases will be necessary, while nearly 30 percent perceive that no additional personnel expenditures will be required. Only 11 percent of respondents perceive a significant increase in personnel expenditures will be required. Respondents indicate a variety of perceived costs for personnel expenditure increases, from no cost to \$350,000, listing time for staff development and training, additional mental health staff members, and using outside specialists as perceived additional actual purchases needed from the personnel budget.

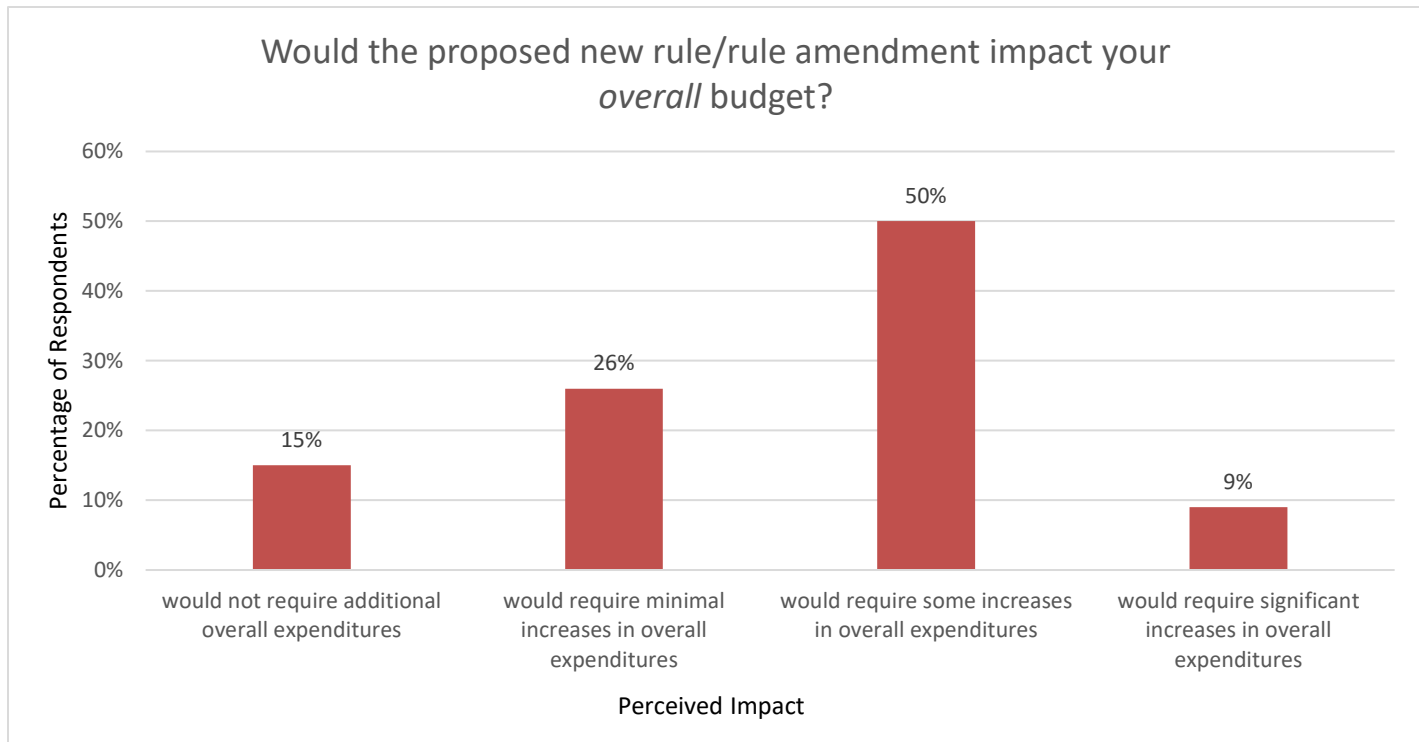
PROFESSIONAL DEVELOPMENT



Questions 23 through 28 address the perceived impact the proposed new rule/rule amendment would have on a district’s professional development budget and include questions referencing the actual number of staff (classified and licensed) needing professional development as well as the number of hours of training required for staff members. Nearly 85 percent of respondents perceive that minimal, some, or significant increases in professional development expenditures will be required when implementing the new rule/rule amendment. Respondents list a variety of costs, from no cost to \$14,000, as perceived additional professional development expenditures. Expenses for substitute staff costs, travel costs, and salary for on- and off-site training of staff are listed by respondents as actual expenditures. Most respondents perceive all licensed and classified staff would need professional development, listing hours needed for each staff member from 2 to over 8.

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OVERALL IMPACT

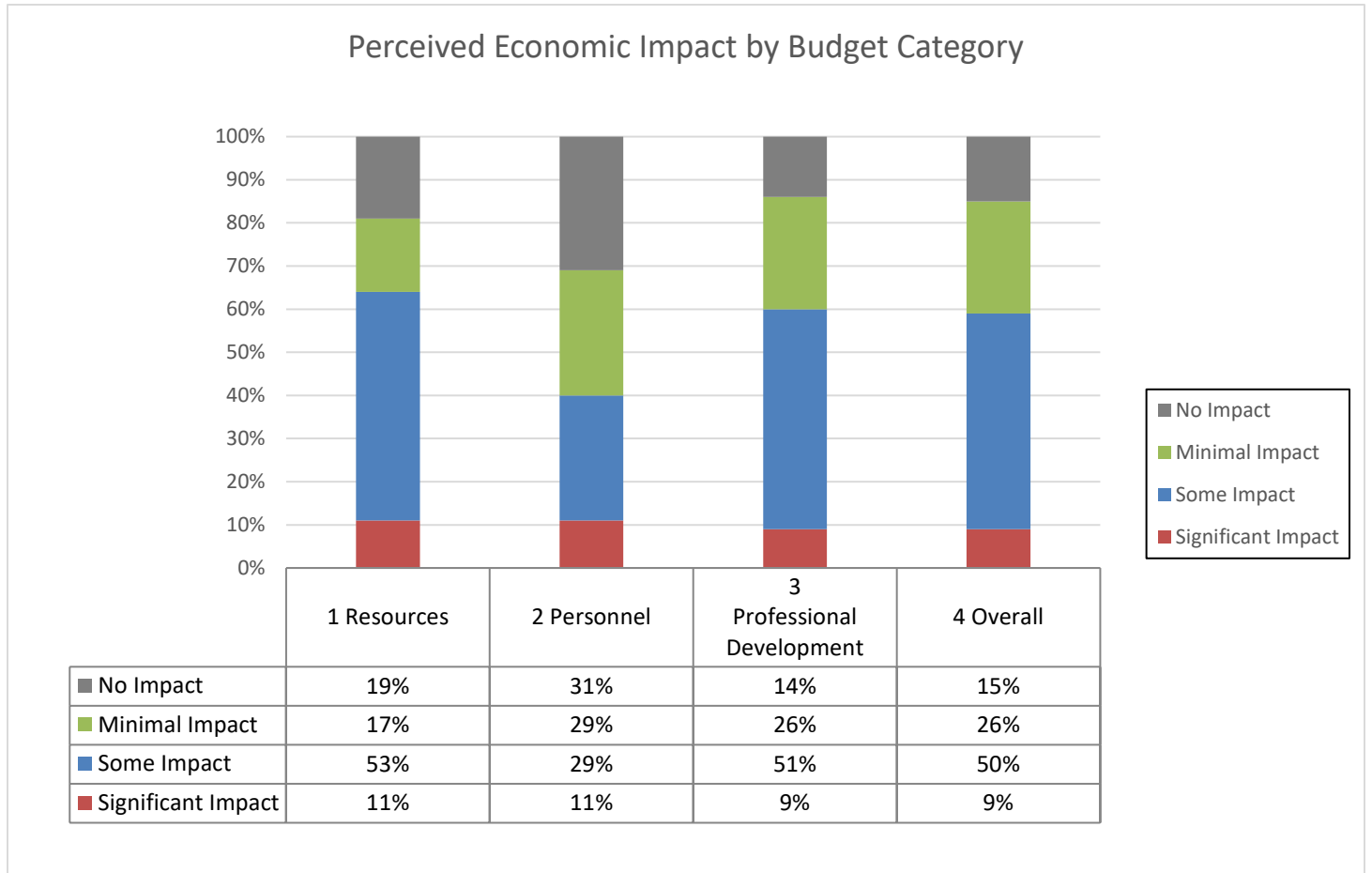


Questions 29 through 31 address the perceived impact the proposed new rule/rule amendment would have on a district’s *overall* budget and include questions referencing the actual dollar amount and purchases required with the perceived increase in overall expenditures. Nearly 85 percent of respondents perceive that minimal, some, or significant increases in overall expenditures will be required when implementing the new rule/rule amendment.

Question 32 provides respondents the opportunity to list anything else they believe the OPI should consider in determining a fiscal impact for a proposed new rule/rule amendment to require local school district implementation of a policy on suicide prevention and response. The 14 respondents completing this question list lack of community resources for rural areas/difficulty for small schools, a need for a statewide/centralized program, and the need to take continued implementation into account with initial fiscal impact as the most important perceived other needs for districts. Additionally, several respondents indicate that districts have already trained employees/have procedures in place or are unsure/unfamiliar with costs of creating and implementing policy. One respondent cuts to the heart of the matter: “You cannot put a dollar amount on saving a life.”

Economic Impact Statement for Suicide Prevention and Response

CONCLUSION



Overall, the survey data show no indication that this new rule/rule amendment would create a significant economic impact for districts and their schools. *It is important to note that the proposed new rule/rule amendment and the legislation it is based upon simply require local school districts to adopt a policy, procedure, or plan addressing suicide prevention and response. The decision regarding how many resources, fiscal or otherwise, to allocate toward the implementation of those policies, procedures, or plans will be left to the discretion of local school districts.*

Based on the analysis of the survey results and the advice of the negotiated rulemaking committee, the OPI has concluded that school district expenditures are insubstantial under the proposed new rule/rule amendment and expenditures can be readily absorbed into the budgets of existing district programs.