

Multiple Agency Fiscal Note Summary

Bill Number: 5100 S SB	Title: Financial literacy seminars
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Estimated Cash Receipts

NONE

Estimated Expenditures

Agency Name	2017-19			2019-21			2021-23		
	FTEs	GF-State	Total	FTEs	GF-State	Total	FTEs	GF-State	Total
Student Achievement Council	.0	0	0	.0	0	0	.0	0	0
University of Washington	.2	59,594	59,594	.1	30,068	30,068	.1	30,068	30,068
Washington State University	Fiscal note not available								
Eastern Washington University	.0	0	0	.0	0	0	.0	0	0
Central Washington University	.0	0	0	.0	0	0	.0	0	0
The Evergreen State College	.0	0	0	.0	0	0	.0	0	0
Western Washington University	.0	0	0	.0	0	0	.0	0	0
Community and Technical College System	.0	370,000	370,000	.0	370,000	370,000	.0	370,000	370,000
Total	0.2	\$429,594	\$429,594	0.1	\$400,068	\$400,068	0.1	\$400,068	\$400,068

Estimated Capital Budget Impact

NONE

Prepared by: Breann Boggs, OFM	Phone: (360) 902-0563	Date Published: Preliminary 3/ 9/2017
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* See Office of the Administrator for the Courts judicial fiscal note

** See local government fiscal note

FNPID: 48221

FNS029 Multi Agency rollup

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 340-Student Achievement Council
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Part I: Estimates

☒ No Fiscal Impact

The cash receipts and expenditure estimates on this page represent the most likely fiscal impact. Factors impacting the precision of these estimates, and alternate ranges (if appropriate), are explained in Part II.

Check applicable boxes and follow corresponding instructions:

- ☐ If fiscal impact is greater than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete entire fiscal note form Parts I-V.
- ☐ If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).
- ☐ Capital budget impact, complete Part IV.
- ☐ Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Becky Thompson	Phone: 360-753-7840	Date: 03/06/2017
Agency Approval: Don Bennett	Phone: 360-753-7810	Date: 03/06/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/07/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

SSB 5100 expands on financial aid counseling legislation passed in 2012. The proposal requires institutions "to take reasonable steps to ensure" that incoming students participate in a financial literacy seminar that includes the information provided related to counseling, including SNG rules, scholarship and work study information, loan options, financial literacy, salaries, student perspectives, and contact information.

SSB 5100 differs from the original bill in that institutions would not need to consult with the Washington Student Achievement Council (WSAC) and the seminars do not need to be live.

These changes do not alter WSAC's responsibilities. WSAC would provide guidance to institutions reflecting this requirement. No fiscal impact.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Part III: Expenditure Detail

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 360-University of Washington
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Part I: Estimates

☐

No Fiscal Impact

Estimated Cash Receipts to:

NONE

Estimated Expenditures from:

	FY 2018	FY 2019	2017-19	2019-21	2021-23
FTE Staff Years	0.4	0.1	0.3	0.1	0.1
Account					
General Fund-State 001-1	44,560	15,034	59,594	30,068	30,068
Total \$	44,560	15,034	59,594	30,068	30,068

Estimated Capital Budget Impact:

NONE

The cash receipts and expenditure estimates on this page represent the most likely fiscal impact. Factors impacting the precision of these estimates, and alternate ranges (if appropriate), are explained in Part II.

Check applicable boxes and follow corresponding instructions:

☐

If fiscal impact is greater than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete entire fiscal note form Parts I-V.

☒

If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).

☐

Capital budget impact, complete Part IV.

☐

Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Jed Bradley	Phone: 2066164684	Date: 03/02/2017
Agency Approval: Becka Johnson Poppe	Phone: 206-616-7203	Date: 03/02/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/07/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

EFFECT OF SUBSTITUTE:

- Removes the requirement that the financial literacy seminars must be "live."
- Removes the Student Achievement Council's role as consultant to the higher education institutions.
- Adds a subject to appropriation provision to the financial literacy seminar requirement.

Section 1(4) of S SB 5100 requires that, subject to appropriation, each institution of higher education take reasonable steps, by the 2017-18 academic year, to ensure that each of its enrolled students participates in a financial literacy seminar. The scope of the seminar must include, but is not limited to, the items described in Section 1(1)(b) through Section 1(1)(g). Institutions are encouraged to present these seminars during student orientation or as early as possible in the academic year.

The substitute bill does not materially affect the fiscal impact of this bill because the previous approach continues to be the most reasonable and cost-effective way to implement the bill.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

No cash receipts.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

The University of Washington estimates that the most reasonable and cost-effective way to meet the requirements of S SB 5100, would be to provide financial literacy seminars via an interactive, online platform.

In accordance with relevant lead agency assumptions from the original bill, we assume that the seminars would need to be provided only to undergraduates upon entering the University and that our existing Learning Management Systems, which include lecture capture technologies, would be appropriate tools to present the seminars. Based on these assumptions, we estimate that some additional staff time would be required to adapt existing materials to fit our campus and to work with the online platform.

For the initial development and launch of the seminars (in FY18), we estimate that a 0.33 FTE Financial Aid Manager (full-time salary of \$90,000, and professional staff benefits rate of 32.4%) would be responsible for adapting existing financial aid materials, developing the self-test questions, recording or creating any additional materials that might be needed, and coordinating with UW Orientation leadership. We also estimate that two weeks of staff time from an IT system analyst (full-time salary of \$80,000, and professional staff benefits rate of 32.4%) would be needed to support the Financial Aid Manager, assist with lecture capture technologies, and ensure that email notifications are properly disseminated to students.

In FY19 and each year thereafter, we anticipate that a small amount of additional staff time would be required of the Financial Aid Manager and the IT system analyst to update the materials and notifications.

To ensure that students are aware of the seminars, we expect that some orientation materials (flyers, signs, etc.) would need to be developed and disseminated -- estimated at approximately \$1000 per year.

The requirements in the substitute bill are subject to an appropriation by the legislature. Any amounts received will be offset by the expenditures outlined above.

Part III: Expenditure Detail

III. A - Expenditures by Object Or Purpose

	FY 2018	FY 2019	2017-19	2019-21	2021-23
FTE Staff Years	0.4	0.1	0.3	0.1	0.1
A-Salaries and Wages	32,900	10,600	43,500	21,200	21,200
B-Employee Benefits	10,660	3,434	14,094	6,868	6,868
C-Professional Service Contracts					
E-Goods and Other Services	1,000	1,000	2,000	2,000	2,000
G-Travel					
J-Capital Outlays					
M-Inter Agency/Fund Transfers					
N-Grants, Benefits & Client Services					
P-Debt Service					
S-Interagency Reimbursements					
T-Intra-Agency Reimbursements					
9-					
Total:	\$44,560	\$15,034	\$59,594	\$30,068	\$30,068

III. B - Detail: *List FTEs by classification and corresponding annual compensation. Totals need to agree with total FTEs in Part I and Part IIIA*

Job Classification	Salary	FY 2018	FY 2019	2017-19	2019-21	2021-23
Financial Aid Manager	90,000	0.3	0.1	0.2	0.1	0.1
IT system analyst	80,000	0.0	0.0	0.0	0.0	0.0
Total FTE's	170,000	0.4	0.1	0.3	0.1	0.1

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 370-Eastern Washington University
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Part I: Estimates

☒ No Fiscal Impact

The cash receipts and expenditure estimates on this page represent the most likely fiscal impact. Factors impacting the precision of these estimates, and alternate ranges (if appropriate), are explained in Part II.

Check applicable boxes and follow corresponding instructions:

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- ☐ If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).
- ☐ Capital budget impact, complete Part IV.
- ☐ Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Alexandra Rosebrook	Phone: (509) 359-7364	Date: 03/08/2017
Agency Approval: Alexandra Rosebrook	Phone: (509) 359-7364	Date: 03/08/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/08/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

Proposal substitute senate bill 5100 requires each institution of higher education, must take reasonable steps to ensure each incoming student participates in a live financial literacy seminar by the 2017-18 academic year.

Effect of changes in the substitute bill:

- Removes the requirement that the financial literacy seminars must be “live.”
- Removes the Student Achievement Council’s role as consultant to the higher education institutions.
- Adds a subject to appropriation provision to the financial literacy seminar requirement.

Eastern currently provides a new student orientation to all incoming students. The financial literacy seminar will be incorporated into the new student orientation. The anticipated time to train the staff of the new student orientation to properly deliver the material will be minimal.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Part III: Expenditure Detail

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 375-Central Washington University
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Part I: Estimates

☒ No Fiscal Impact

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- ☐ Capital budget impact, complete Part IV.
- ☐ Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Karen Thiemann	Phone: (509) 963-1233	Date: 02/28/2017
Agency Approval: Karen Thiemann	Phone: (509) 963-1233	Date: 02/28/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/07/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

Section 1 (4) states that subject to the availability of amounts appropriated for this specific purpose, by the 2017-18 academic year, each institution of higher education must take reasonable steps to ensure that the institution presents and each incoming student participates in a financial literacy seminar.

Central Washington University already presents the majority of this information during our orientation sessions. There would be no fiscal impact to implement.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Part III: Expenditure Detail

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 376-The Evergreen State College
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Part I: Estimates

☒ No Fiscal Impact

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- ☐ Capital budget impact, complete Part IV.
- ☐ Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Lisa Dawn-Fisher	Phone: 360-867-6185	Date: 03/07/2017
Agency Approval: Lisa Dawn-Fisher	Phone: 360-867-6185	Date: 03/07/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/08/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

Section 1 (4) of the bill requires institutions of higher education to ensure that each incoming student participates in a financial literacy seminar. The scope of the seminar must include, but is not limited to, financial aid curriculum provided by the Office of Student Financial Assistance. Institutions are encouraged to present these seminars during student orientation or as early as possible in the academic year.

Effect of changes in the substitute bill:

- Removes the requirement that the financial literacy seminars must be “live.”
- Removes the Student Achievement Council’s role as consultant to the higher education institutions.
- Adds a subject to appropriation provision to the financial literacy seminar requirement.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Section 1 (4) of the bill requires institutions of higher education to ensure that each incoming student participates in a financial literacy seminar. Evergreen currently provides a seminar at orientation in the fall, thus no fiscal impact is anticipated.

Part III: Expenditure Detail

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 380-Western Washington University
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Part I: Estimates

☒

No Fiscal Impact

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Check applicable boxes and follow corresponding instructions:

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- ☐ Capital budget impact, complete Part IV.
- ☐ Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Kirk England	Phone: 360-650-4694	Date: 03/08/2017
Agency Approval: Kirk England	Phone: 360-650-4694	Date: 03/08/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/08/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

Effect of changes in the substitute bill:

- Removes the requirement that the financial literacy seminars must be “live.”
- Removes the Student Achievement Council’s role as consultant to the higher education institutions.
- Adds a subject to appropriation provision to the financial literacy seminar requirement.

Sec (1)4 states that each institution of higher education must take reasonable steps to ensure that the institution presents, and each incoming students participates in, a financial literacy seminar. The institutions are encouraged to present these seminars during student orientation or as early as possible in the academic year.

WWU has several financial literacy programs in place and strongly encourage incoming freshman to participate in as many as possible as part of their freshman orientation.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Part III: Expenditure Detail

Part IV: Capital Budget Impact

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

Individual State Agency Fiscal Note

Revised

Bill Number: 5100 S SB	Title: Financial literacy seminars	Agency: 699-Community and Technical College System
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Part I: Estimates

☐

No Fiscal Impact

Estimated Cash Receipts to:

NONE

Estimated Expenditures from:

	FY 2018	FY 2019	2017-19	2019-21	2021-23
Account					
General Fund-State 001-1	185,000	185,000	370,000	370,000	370,000
Total \$	185,000	185,000	370,000	370,000	370,000

Estimated Capital Budget Impact:

NONE

The cash receipts and expenditure estimates on this page represent the most likely fiscal impact. Factors impacting the precision of these estimates, and alternate ranges (if appropriate), are explained in Part II.

Check applicable boxes and follow corresponding instructions:

☒

If fiscal impact is greater than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete entire fiscal note form Parts I-V.

☐

If fiscal impact is less than \$50,000 per fiscal year in the current biennium or in subsequent biennia, complete this page only (Part I).

☐

Capital budget impact, complete Part IV.

☐

Requires new rule making, complete Part V.

Legislative Contact: Clinton McCarthy	Phone: 360-786-7319	Date: 02/27/2017
Agency Preparation: Brian Myhre	Phone: 360-704-4413	Date: 03/09/2017
Agency Approval: Cherie Berthon	Phone: 360-704-1023	Date: 03/09/2017
OFM Review: Breann Boggs	Phone: (360) 902-0563	Date: 03/09/2017

Part II: Narrative Explanation

II. A - Brief Description Of What The Measure Does That Has Fiscal Impact

Briefly describe by section number, the significant provisions of the bill, and any related workload or policy assumptions, that have revenue or expenditure impact on the responding agency.

The substitute bill differs from the original in the following way:

Removes the requirement that the financial literacy seminars be “live”.

Current law requires the Office of Student Financial Aid (within the Washington Student Achievement Council) to develop and provide a financial aid counseling curriculum to institutions of higher education. This bill would require institutions of higher education to present, and each incoming student to participate, in a financial literacy seminar.

At a minimum the seminar must include; information about campus and private scholarships and work-study opportunities, an overview of student loan options with an emphasis on repayment obligations, an overview of financial literacy including basic money management skills, average salaries for a wide range of jobs, perspectives from students who are or were recipients of financial aid, and contact information for local financial aid resources and the federal student aid ombud’s office. Each item listed above is a required element of the curriculum developed by the Office of Student Financial Aid.

II. B - Cash receipts Impact

Briefly describe and quantify the cash receipts impact of the legislation on the responding agency, identifying the cash receipts provisions by section number and when appropriate the detail of the revenue sources. Briefly describe the factual basis of the assumptions and the method by which the cash receipts impact is derived. Explain how workload assumptions translate into estimates. Distinguish between one time and ongoing functions.

No cash receipts impact.

II. C - Expenditures

Briefly describe the agency expenditures necessary to implement this legislation (or savings resulting from this legislation), identifying by section number the provisions of the legislation that result in the expenditures (or savings). Briefly describe the factual basis of the assumptions and the method by which the expenditure impact is derived. Explain how workload assumptions translate into cost estimates. Distinguish between one time and ongoing functions.

Providing financial literacy seminars to each incoming student of a community or technical college would have an expenditure impact.

Fifteen community and technical colleges already contract with an organization that provides financial literacy information via the internet. It is assumed the remaining nineteen colleges in the system would also contract with the organization to provide the seminar and related financial literacy information. It is also assumed that colleges currently contracting with the financial literacy organization will be able to provide the seminar for no additional cost, at their current contracted rate.

Based on current costs for colleges to contract for the services of a financial literacy organization, the median annual cost per student would be \$1.50. Financial literacy seminars would have to be provided to approximately 123,000 students, in nineteen colleges.

Annual costs rounded to nearest thousand) would be:
\$1.50 X 123,000 students = \$185,000 per year. These costs would be ongoing.

Part III: Expenditure Detail

III. A - Expenditures by Object Or Purpose

	FY 2018	FY 2019	2017-19	2019-21	2021-23
FTE Staff Years					
A-Salaries and Wages					
B-Employee Benefits					
C-Professional Service Contracts	185,000	185,000	370,000	370,000	370,000
E-Goods and Other Services					
G-Travel					
J-Capital Outlays					
M-Inter Agency/Fund Transfers					
N-Grants, Benefits & Client Services					
P-Debt Service					
S-Interagency Reimbursements					
T-Intra-Agency Reimbursements					
9-					
Total:	\$185,000	\$185,000	\$370,000	\$370,000	\$370,000

Part IV: Capital Budget Impact

No capital budget impact.

Part V: New Rule Making Required

Identify provisions of the measure that require the agency to adopt new administrative rules or repeal/revise existing rules.

No rule-making required.