

Quarter 1 of Calendar Year 2020

Inefficiencies from old rules are cumulative, and over time, the impacts are compounded by multiplier effects. Removing burdens associated with 55 rules in the first quarter of calendar year 2020 eliminated over \$3.4 million of lost productivity for Arizona businesses. These changes do not reduce the welfare of Arizonans.

**55 Rules Improved
or Eliminated
Across
10 Agencies**



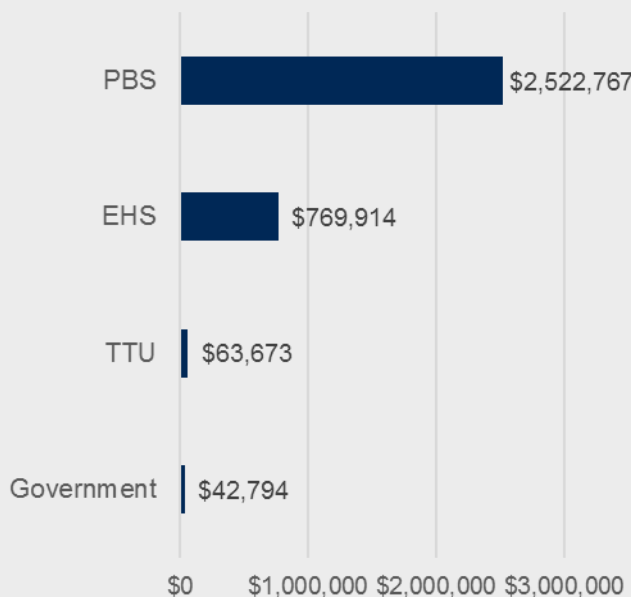
\$3,399,147.61

**Annual Savings for the
Arizona Economy**

\$0.00

**Lost Benefits
for Arizonans**

Value of Rule Improvements and Rule Eliminations from CY2020 Q1 by Supersector



The monetized economic impact refers to the costs to businesses simply due to the existence of these outdated or obsolete rules within the Arizona Administrative Code (AAC). These rules may have become obsolete due to timeliness or even lack of statutory authority. The estimates for lost economic activity quantify how much productivity businesses lose because a worker must sift through these rules even though they are invalid. This could mean reading an outdated rule, consulting the Arizona Revised Statutes (ARS) for statutory authority, or even possibly making a business decision based on a rule that lacks validity. Since these rules do not increase societal welfare, there is no loss in benefits. These estimates are focusing on a very narrow and conservative estimate of how businesses can be impacted by outdated rules.

Introduction

This report contains tables and charts that monetize the impact of regulation improvement during the first quarter of calendar year (CY) 2020 (January 2020 – March 2020). This includes the value of both rule improvements and rule eliminations. The final section includes the methodology for each process as well as a sample of the formula that is used to generate these estimates. These estimates represent preliminary impacts using a very conservative process. The following table shows the status of each quarter in calendar year 2020.

Progress of Monetization Project by Quarter				
<u>Calendar Quarter</u>	<u>Calendar Equivalent</u>	<u>Monetization Status</u>	<u>Rule Count</u>	<u>Savings</u>
Q1 CY2020	January-March 2020	Completed	55	\$3,399,147.61
Q2 CY2020	April-June 2020	Outstanding	TBD	TBD
Q3 CY2020	July-September 2020	Outstanding	TBD	TBD
Q4 CY2020	October-December 2020	Outstanding	TBD	TBD
Total			55	\$3,399,147.61

In the first quarter of CY 2020, 10 agencies improved or eliminated 55 rules. We estimate that the unimproved versions of these rules resulted in an aggregate loss of \$3,399,147.61 every year across the economy of Arizona in the form of lost productivity. In regulation, the benefits must always be considered against the costs, and for these regulations, the benefits were \$0.00 each year. Individually, these rules have minimal impact, but over the entire economy over time, these very minimal impacts can combine to produce significant inefficiencies in the economy.

Eliminations and Improvements Combined

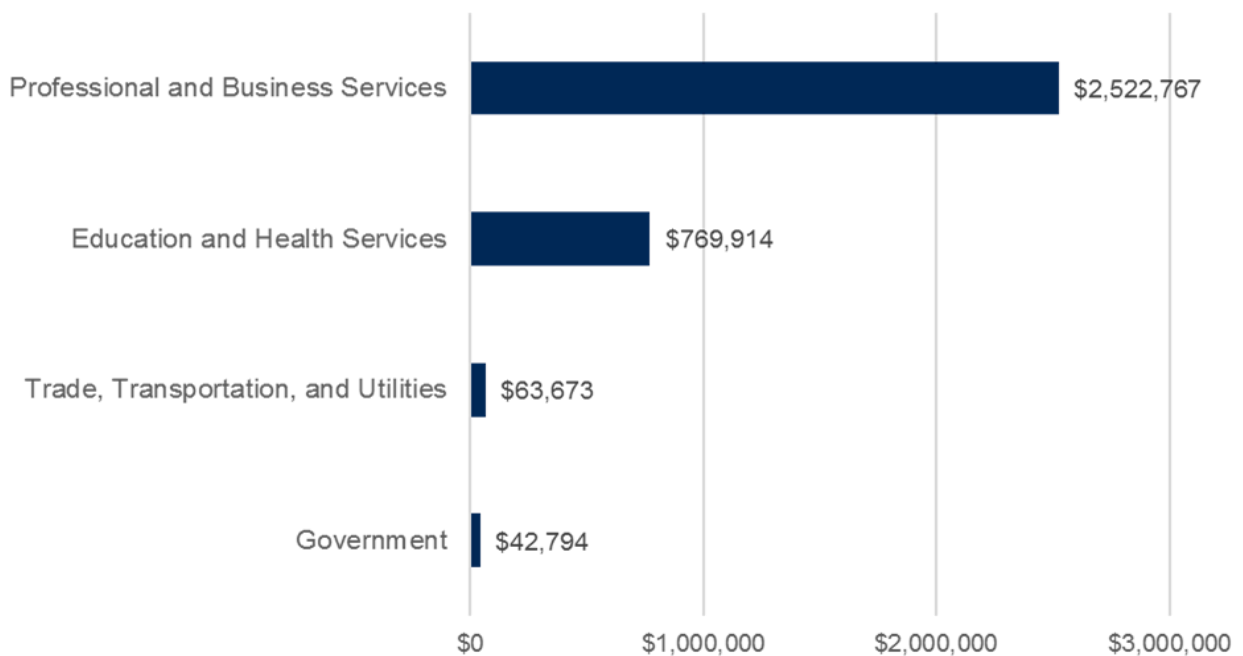
Value of Rule Eliminations and Rule Improvements from CY2020 Q1 by Agency

Agency	Total Savings	Rule Count
Arizona Health Care Cost Containment System	\$1,035.00	1
Arizona State Retirement System	\$8,804.25	1
Board of Dispensing Opticians	\$65,737.12	1
Citizens Clean Elections Commission	\$2,462.63	3
Department of Child Safety	\$11,335.62	2
Department of Health Services	\$375,348.95	12
Department of Public Safety	\$30,492.00	8
Industrial Commission	\$167,381.03	1
State Board of Accountancy	\$2,355,385.78	15
State Board of Pharmacy	\$381,165.24	11
Total	\$3,399,147.61	55

Value of Rule Eliminations and Rule Improvements from CY2020 Q1 by Supersector

NAICS	Supersector	Total Savings
10000000	Natural Resources and Mining	\$0.00
20000000	Construction	\$0.00
30000000	Manufacturing	\$0.00
40000000	Trade, Transportation, and Utilities	\$63,673.24
50000000	Information	\$0.00
55000000	Financial Activities	\$0.00
60000000	Professional and Business Services	\$2,522,766.81
65000000	Education and Health Services	\$769,913.68
70000000	Leisure and Hospitality	\$0.00
80000000	Other Services	\$0.00
90000000	Government	\$42,793.88
Total		\$3,399,147.61

Value of Rule Improvements and Rule Eliminations from CY2020 Q1 by Supersector



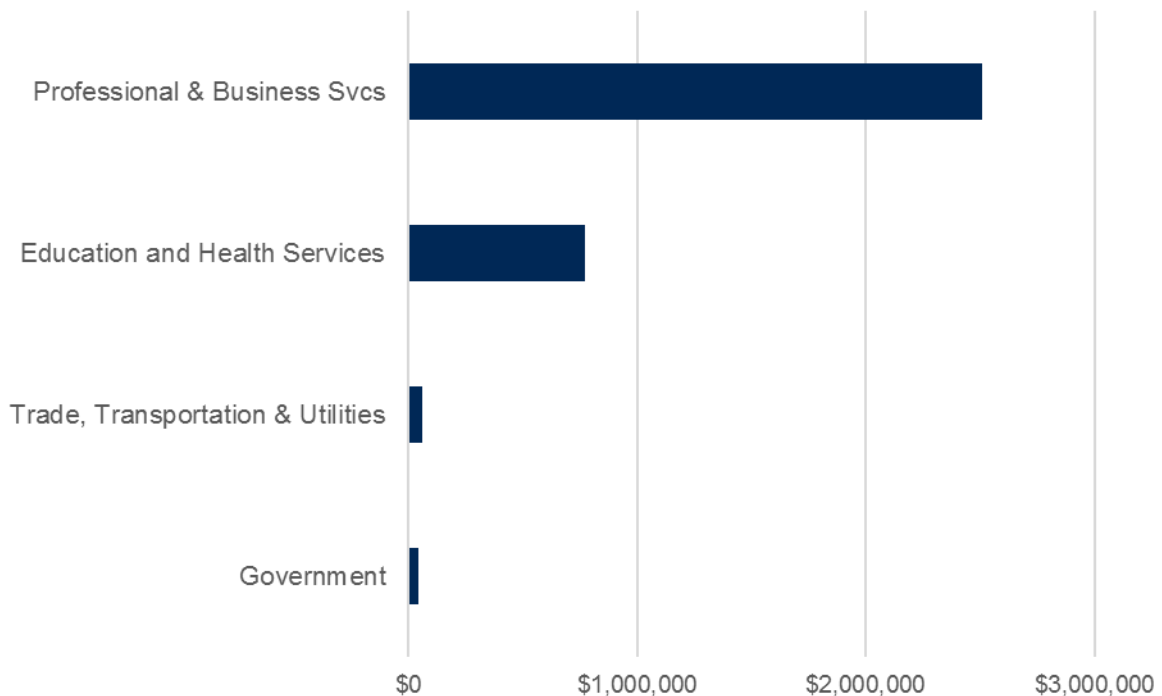
Improvements Only

Value of Rule Improvements from CY2020 Q1 by Agency		
Agency	Rule	Total Savings
Arizona Health Care Cost Containment System	R9-34-101	\$1,035.00
Arizona State Retirement System	R2-8-122	\$8,804.25
Board of Dispensing Opticians	R4-20-120	\$65,737.12
Citizens Clean Elections Commission	R2-20-XXX	\$2,462.63
Department of Child Safety	R21-5-20X	\$11,335.62
Department of Health Services	R9-XX-XXX	\$375,348.95
Department of Public Safety	R13-10-10X	\$30,492.00
Industrial Commission	R20-5-507	\$167,381.03
State Board of Accountancy	R4-1-XXX	\$2,343,334.35
State Board of Pharmacy	R4-23-XXX	\$380,666.17
Total	53	\$3,386,597.10

Value of Rule Improvements from CY2020 Q1 by Supersector

NAICS	Supersector	Total Savings
10000000	Natural Resources & Mining	\$0.00
20000000	Construction	\$0.00
30000000	Manufacturing	\$0.00
40000000	Trade, Transportation & Utilities	\$63,174.17
50000000	Information	\$0.00
55000000	Financial Activities	\$0.00
60000000	Professional & Business Svcs	\$2,510,715.38
65000000	Education and Health Services	\$769,913.68
70000000	Leisure & Hospitality	\$0.00
80000000	Other Services	\$0.00
90000000	Government	\$42,793.88
Total		\$3,386,597.10

Value of Rule Improvements from CY2020 Q1 by Supersector



Eliminations Only

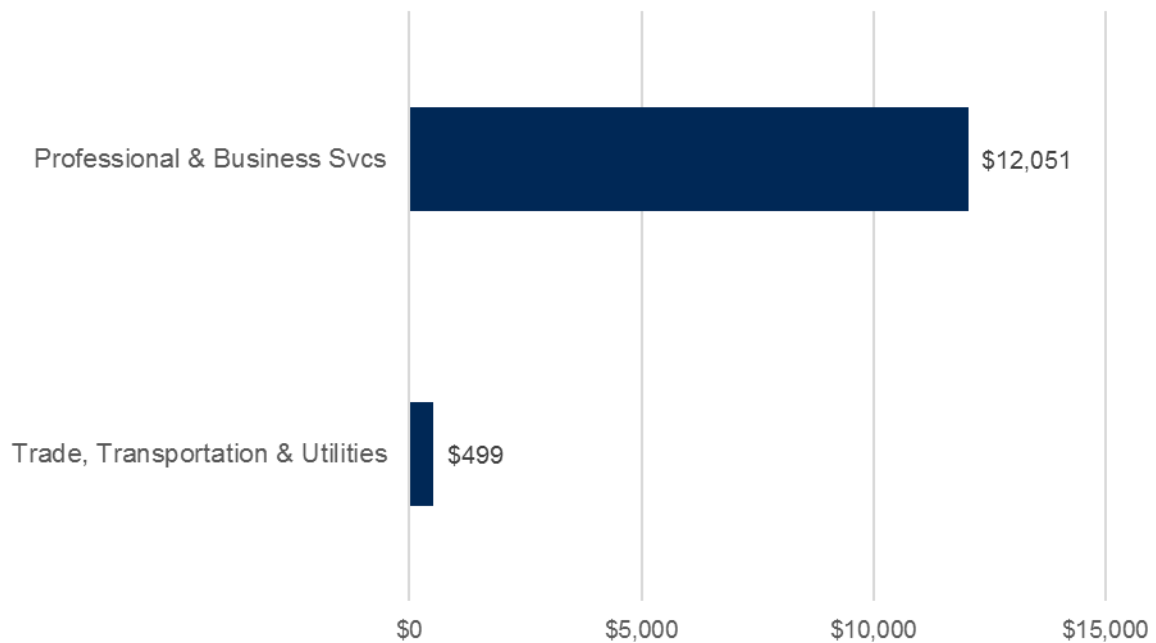
Value of Rule Eliminations from CY2020 Q1 by Agency

Agency	Rule	Total Savings
State Board of Accountancy	R4-1-228	\$12,051.43
State Board of Pharmacy	R4-23-801	\$499.08
Total	2	\$12,550.51

Value of Rule Eliminations from CY2020 Q1 by Supersector

NAICS	Supersector	Total Savings
10000000	Natural Resources & Mining	\$0.00
20000000	Construction	\$0.00
30000000	Manufacturing	\$0.00
40000000	Trade, Transportation & Utilities	\$499.08
50000000	Information	\$0.00
55000000	Financial Activities	\$0.00
60000000	Professional & Business Svcs	\$12,051.43
65000000	Education and Health Services	\$0.00
70000000	Leisure & Hospitality	\$0.00
80000000	Other Services	\$0.00
90000000	Government	\$0.00
	Total	\$12,550.51

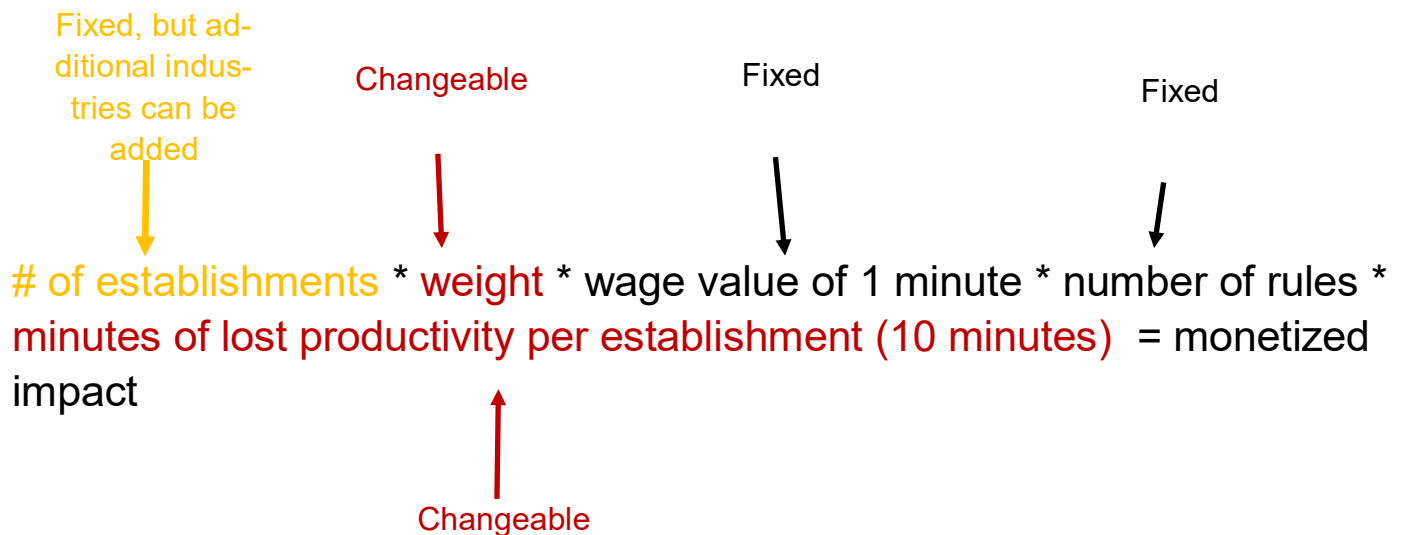
Value of Rule Eliminations from CY2020 Q1 by Supersector



Improvement Formula

of establishments * weight * wage value of 1 minute * number of rules * minutes of lost productivity per establishment (10 minutes) = monetized

1,230 * 1 * \$0.24 * 13 * 10 = \$38,376.00 (rounded value for wage used in this example)



Number of establishments— derived from number of establishments for each industry attached to particular rules from QCEW at the three digit NAICS level or higher.

Weight— this number can control for industries that are comprised of a small number of very large establishments (NAICS 622: Hospitals). The ratio of average employees per establishment in the industry over the average employees per establishment among all industries. Minimum value is 1. Values that exceed 1 are rounded down to the whole integer. This is designed to control for industries that have a small number of large establishments.

This number can also be used to control for industries that are overly broad (NAICS 541: Professional, Scientific, and Technical Services). Reducing this number below the value of 1 can limit the size of establishments used in overly broad NAICS industries.

Wage value of 1 minute— derived from the weekly wages for each industry attached to a particular rules from QCEW at the three digit NAICS level or higher.

Number of rules— derived from the quantity of rules in each group of rulemakings.

Minutes of lost productivity per establishment— a reasonable estimate of 10 minutes are used for each rule.

Improvement Methodology

1. Identify at least one industry at the three digit or higher North American Industrial Classification System (NAICS) level. These are somewhat broad industry classifications at the three digit level. Not all businesses in each industry will be impacted in the same way. There will also be businesses outside of each industry that could be impacted. This analysis includes businesses that are probably not impacted and excludes businesses that are probably impacted.
2. Use Quarterly Census of Employment and Wages (QCEW) data from the third quarter of 2019. At the state level, this data set can provide a quarterly average of the number of establishments and average weekly wages in each industry at the three digit NAICS level or higher.
3. Assume that each establishment has at least one person dedicated to working on compliance issues for the establishment. Some establishments will have more individuals working on compliance, and others may outsource their regulatory compliance matters to outside businesses. Our analysis generally assumes that each obsolete rule drains productivity of compliance employees once per year.
4. Divide the average number of employees in the industry by the average number of employees in all industries. Round this value down to the nearest integer (minimum value of 1). This weight controls for large industries with few establishments, like NAICS 622: Hospitals.
5. Establish the cost or burden of the rule on each individual's time. This is established by assigning a weight of 10 minutes for each rule. This weight is then multiplied by the number of rules improved to establish a rough estimate of time saved for each individual. This weight is intended to include time saved by not working with statutes and rules that are out of sync or unclear.
6. Apply the weekly average wage in the industry to the amount of time lost by the individual employee in each establishment. (Average Weekly Wage/2,400).
7. Multiply the cost of the lost time by the number of establishments to get the total lost productivity from the rule for an entire year across the entire industry. (Average Weekly
*Number of Establishments.
8. This final number estimates how much businesses lose in productivity due to the existence of obsolete and outdated rules each year.

Elimination Formula

of establishments * weight * wage value of 1 minute * (word count/100)
= monetized impact

20,306 * 0.5 * \$0.58 * (2,981/100) = \$175,921.67 (rounded value for wage used in this example)


Fixed, but additional industries can be added

Changeable

Fixed

Fixed

Changeable


of establishments * weight * wage value of 1 minute * (word count/ 100) * =
monetized impact

Number of establishments– derived from number of establishments for each industry attached to particular rules from QCEW at the three digit NAICS level or higher.

Weight– this number can control for industries that are comprised of a small number of very large establishments (NAICS 622: Hospitals). The ratio of average employees per establishments in the industry over the average employees per establishment among all industries. Minimum value is 1. Values that exceed 1 are rounded down to the whole integer. This is designed to control for industries that have a small number of large establishments.

This number can also be used to control for industries that are overly broad (NAICS 541: Professional, Scientific, and Technical Services). Reducing this number below the value of 1 can limit the size of establishments used in overly broad NAICS industries.

Wage value of 1 minute– derived from the weekly wages for each industry attached to a particular rules from QCEW at the three digit NAICS level or higher.

Word Count– number of words in the eliminated rules.

100– an estimated reading speed of 100 words per minute for an individual reading the AAC.

Elimination Methodology

1. Identify at least one industry at the three digit or higher North American Industrial Classification System (NAICS) level. These are somewhat broad industry classifications at the three digit level. Not all businesses in each industry will be impacted in the same way. There will also be businesses outside of each industry that could be impacted. This analysis includes businesses that are probably not impacted and excludes businesses that are probably impacted.
2. Use Quarterly Census of Employment and Wages (QCEW) data from the third quarter of 2019. At the state level, this data set can provide a quarterly average of the number of establishments and average weekly wages in each industry at the three digit NAICS level or higher.
3. Assume that each establishment has one person dedicated to working on compliance issues for the establishment. Some establishments will have more individuals working on compliance, and others may outsource their regulatory compliance matters to outside businesses. Our analysis assumes that each obsolete rule drains productivity of compliance employees once per year.
4. Divide the average number of employees in the industry by the average number of employees in all industries. Round this value down to the nearest integer (minimum value of 1). This weight controls for large industries with few establishments.
5. Establish the cost or burden of the rule on each individual's time. This is established by counting the words in each repealed section and assuming that individuals read legal documents at roughly 100 words per minute (WPM). Generally, adults read somewhere between 200 and 300 words per minute, but legal and technical documents generally take more time. Some rules may include references to other places in the Arizona Administrative Code (AAC). Other rules may require frequent re-reading due to their complexity. These types of issues are excluded from the analysis aside from the 100 WPM assumption.
6. Apply the weekly average wage in the industry to the amount of time lost by the individual employee in each establishment. (Average Weekly Wage/2,400).
7. Multiply the cost of the lost time by the number of establishments to get the total lost productivity from the rule for an entire year across the entire industry. (Average Weekly *Number of Establishments).
8. This final number estimates how much businesses lose in productivity due to the existence of obsolete and outdated rules each year.

Conclusion

55 obsolete or antiquated rules were improved or eliminated in the first quarter of CY 2020. Some of these rules had minimal impact on a narrow set of businesses, and others had minimal impact on a very broad set of businesses. These minimal impacts are insignificant on the individual level, but as these aggregate, they can become a significant drag on economic growth.

For this limited set of rules, OEO estimates that Arizona businesses forego over \$3.4 million in lost productivity each year. This may also seem insignificant in a state with Gross Domestic Product (GDP) of \$322 billion, but these annual losses become cumulative over multiple years. Even modest gains in GDP can multiply into immense gains over large time horizons. This analysis is limited in scope to the current year, but future projects will include future projections of the economic activity generated from the removal of these rules ten years into the future.

Addendum

The following table includes the information from all eleven quarters of rule monetization that have been completed by OEO to date. These quarters all use the same methodology. When OEO makes improvements to its methodology, historic quarters are updated to reflect any new methodological changes.

<u>Calendar Quarter</u>	<u>Calendar Equivelant</u>	<u>Monetization Status</u>	<u>Rule Count</u>	<u>Savings</u>
Q3 CY2016	July-September 2016	Completed	144	\$5,746,774.43
Q4 CY2016	October-December 2016	Completed	69	\$2,773,221.42
Q1 CY2017	January-March 2017	Completed	144	\$6,569,109.52
Q2 CY2017	April-June 2017	Completed	145	\$10,769,527.78
Q3 CY2017	July-September 2017	Completed	255	\$24,032,472.34
Q4 CY2017	October-December 2017	Completed	132	\$7,589,385.18
Q1 CY2018	January-March 2018	Completed	113	\$3,423,126.11
Q2 CY2018	April-June 2018	Completed	95	\$6,710,568.79
Q3 CY2018	July-September 2018	Completed	105	\$10,827,568.50
Q4 CY2018	October-December 2018	Completed	109	\$10,471,984.75
Q1 CY2019	January-March 2019	Completed	158	\$17,058,721.33
Q2 CY2019	April-June 2018	Completed	186	\$13,949,557.52
Q3 CY2019	July-September 2018	Completed	69	\$9,407,095.69
Q4 CY2019	October-December 2018	Completed	224	\$13,472,850.33
Q1 CY2020	January-March 2020	Completed	55	\$3,399,147.61
Total			2,003	\$146,201,111.30