

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Board for Asbestos, Lead, and Home Inspectors
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 15-30
VAC Chapter title(s)	Virginia Lead-Based Paint Activities Regulations
Action title	Update to 18VAC15-30-510 and DIBR
Date this document prepared	February 3, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Fast-Track

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – See Box #4.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	<p>There are no anticipated direct or indirect costs associated with this change. Please refer to the “Economic Impact” section of the ABD.</p> <p>The only direct benefit anticipated from this change is allowing the regulation to be clearer to the individuals who engage in lead-based paint activities by ensuring the list of documented methodologies is current, accurate. This will help to ensure that the regulation is consistent with applicable EPA regulations.</p>	
(5) Information Sources		

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – See Box #4.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	Regulants are required by the applicable EPA regulation to follow the current HUD guidelines. In addition, the regulation requires regulants to follow any future EPA or HUD guidance that may replace the methodologies cited in the regulation.	
(5) Information Sources		

Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – See Box #4.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	The only viable alternative is to make no change to regulation. Regulants are required by the applicable EPA regulation to follow the current HUD guidelines. In addition, the regulation requires regulants to follow any future EPA or HUD guidance that may replace the methodologies cited in the regulation.	
(5) Information Sources		

Impact on Local Partners

Use this chart to describe impacts on local partners. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 2: Impact on Local Partners

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated direct or indirect costs to local partners. There are no anticipated direct or indirect benefits to local partners.	
(4) Assistance		

(5) Information Sources	
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Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated direct or indirect costs to families. There are no anticipated direct or indirect benefits to families.	
(4) Information Sources		

Impacts on Small Businesses

Use this chart to describe impacts on small businesses. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	The costs and benefits of this regulatory change are identified in Table 1(a).	

	<p>Under the enabling statute, the standards for performing lead-based paint activities established by the Board must be consistent with the Residential Lead-based Paint Hazard Reduction Act and United States Environmental Protection Agency regulations, but must not be more stringent than EPA regulations. Regulants are required by EPA regulation to follow the current HUD guidelines. In addition, the regulation requires regulants to follow any future EPA or HUD guidance that may replace the methodologies cited in the regulation.</p> <p>To the extent any licensed lead abatement contractor falls within the meaning of “small business” in § 2.2-4007.1 of the Code of Virginia, these entities would be affected. The enabling statute establishing the licensing program for those engaged in lead-based paint activities provides no exemption for small business; therefore there are no such exemptions contained in the proposed change.</p>
(4) Alternatives	
(5) Information Sources	

Changes to Number of Regulatory Requirements

For each individual VAC Chapter amended, repealed, or promulgated by this regulatory action, list (a) the initial requirement count, (b) the count of requirements that this regulatory package is adding, (c) the count of requirements that this regulatory package is reducing, (d) the net change in the number of requirements. This count should be based upon the text as written when this stage was presented for executive branch review. Five rows have been provided, add or delete rows as needed. In the last row, indicate the total number for each column.

Table 5: Total Number of Requirements

	Number of Requirements			
Chapter number	Initial Count	Additions	Subtractions	Net Change
18VAC15-30	323	0	0	0
TOTAL	323	0	0	0