

Office of Regulatory Management
Economic Review Form

Agency name	Department of Elections
Virginia Administrative Code (VAC) Chapter citation(s)	1VAC20-20-90
VAC Chapter title(s)	General Administration
Action title	Required training for Virginia voter registration system users
Date this document prepared	12/08/2022
Regulatory Stage (including Issuance of Guidance Documents)	Final - Exempt

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)	<ul style="list-style-type: none"> • This regulatory action indicates the process required for individuals to have access to VERIS, Virginia’s voter registration system • There are no direct or indirect costs associated with this regulation. The Department of Elections has a security awareness training program available to localities at no cost. • There are no direct or indirect benefits associated with this regulatory action 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0.00	(b) 0.00
(3) Net Monetized Benefit	0.00	
(4) Other Costs & Benefits (Non-Monetized)	This regulation increases the security of Virginia’s voter registration system and reduces the risk of misuse of and/or unauthorized access to extremely sensitive data maintained in the system.	
(5) Information Sources	Voter Registration System Security (VRSS) Advisory Group, ELECT Staff	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<ul style="list-style-type: none"> • There are no direct or indirect costs and/or benefits to this regulation. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0.00	(b) 0.00
(3) Net Monetized Benefit	0.00	
(4) Other Costs & Benefits (Non-Monetized)	Without the required training, individuals with access to VERIS are at an increased risk of phishing attempts to access the system, or may be more likely to misuse sensitive information. Unauthorized access to the system could cause multiple technological delays and concerns regarding citizens of the Commonwealth’s private information.	

(5) Information Sources	Voter Registration System Security (VRSS) Advisory Group, ELECT Staff
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Table 1c: Costs and Benefits under Alternative Approach(es)

(1) Direct & Indirect Costs & Benefits (Monetized)	<ul style="list-style-type: none"> An alternative to this regulation would be to require localities to procure their own training. The direct or indirect costs are unknown as it would depend on which entity a locality chose to utilize for security training. Many security programs customize what they offer based on the need of the requesting entity so cost may differ. Security awareness trainings can cost on average anywhere from \$10 per person to \$40 per person. Depending on the size of the locality cost can differ significantly. There are no direct or indirect benefits to this alternative. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$100 - \$4,000 as an estimate	(b) 0.00
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	Localities can choose their own security awareness training instead of utilizing what is offered at no-cost by ELECT.	
(5) Information Sources	KnowBe4 Security Awareness Training, CybSafe Borderless Security Awareness, ESET Cybersecurity Awareness Training, Webroot Security Awareness training, ELECT Staff	

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)	<ul style="list-style-type: none"> There are no direct or indirect costs if localities utilize the cyber security awareness training provided at no-cost by ELECT. There are no direct or indirect benefits as a result of this regulatory action. If a locality chooses to procure their own security awareness training then the information in Table 1c applies.
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) See Table 1c	(b) 0.00
(3) Other Costs & Benefits (Non-Monetized)	See Table 1c	
(4) Assistance	Localities would have to have their security awareness training approved by ELECT.	
(5) Information Sources	See Table 1c.	

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)	<ul style="list-style-type: none"> There are no direct or indirect costs and/or benefits to families. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0.00	(b) 0.00
(3) Other Costs & Benefits (Non-Monetized)	None	
(4) Information Sources	ELECT Staff	

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 &	<ul style="list-style-type: none"> There are no direct or indirect costs to small businesses.
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Benefits (Monetized)	<ul style="list-style-type: none"> There may be direct benefits to small businesses if a small business is used and approved for the security awareness training. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0.00	(b) 0.00
(3) Other Costs & Benefits (Non- Monetized)	None	
(4) Alternatives	None	
(5) Information Sources	ELECT Staff	

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
20	0	2	0	+2
TOTAL				+2