

Office of Regulatory Management
Economic Review Form

Agency name	Department of Labor and Industry
Virginia Administrative Code (VAC) Chapter citation(s)	VOSH Final Orders - Guidance Documents
VAC Chapter title(s)	
Action title	Removal of Guidance Documents
Date this document prepared	February 28, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Removal of Guidance Documents

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)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. No monetized direct/indirect cost/benefits. See box 4 below for non-monetized costs/benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	The benefit is greater clarity since these documents do not meet the statutory definition of a guidance document and not required to be posted on Regulatory Town Hall. There are no costs associated with removal of these documents from Regulatory Town Hall.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. There are no monetized direct/indirect costs/benefits associated with maintaining the status quo: the out-of-date documents would simply remain in place.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	

(4) Other Costs & Benefits (Non-Monetized)	There are no non-monetized direct/indirect costs/benefits associated with maintaining the status quo: the out-of-date documents would simply remain in place.
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.</p> <p>There is no alternative to consider: either the outdated documents will be removed (i.e., the change described in Table 1a) or left in place (i.e., the approach described in Table 1b).</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)		
(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)	Local partners will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)		
(4) Assistance		
(5) Information Sources		

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)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. Families will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs (a) \$0	Direct & Indirect Benefits (b) \$0
(3) Other Costs & Benefits (Non-Monetized)		
(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)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. Small businesses will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)		
(4) Alternatives		
(5) Information Sources		

Changes to Number of Regulatory Requirements

No regulatory requirements associated with these VOSH Final Order documents.

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count (pages)	Additions	Subtractions	Total Net Change in Requirements (pages)
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	2395		2395	(2395)
				Grand Total of Changes in Requirements:	(M/A):
					(D/A):
					(M/R):
					(D/R): (2395)

Key:

Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:

(M/A): Mandatory requirements mandated by federal and/or state statute affecting the agency itself

(D/A): Discretionary requirements affecting agency itself

(M/R): Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

(D/R): Discretionary requirements affecting external parties, including other agencies

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved*	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original PAGE Count	New PAGE Count	Net Change in PAGE Count
VOSH Final Orders (41 total documents)	2395 total pages	0	(2395) total pages
VOSH FO 1979-80	55	0	(55)
VOSH FO 1980-81	48	0	(48)
VOSH FO 1981-82	71	0	(71)
VOSH FO 1982-83	97	0	(97)
VOSH FO 1983-84	76	0	(76)
VOSH FO 1984-85	36	0	(36)
VOSH FO 1985-86	53	0	(53)
VOSH FO 1985-86	53	0	(53)
VOSH FO 1986-87	41	0	(41)
VOSH FO 1987-88	59	0	(59)
VOSH FO 1988-89	83	0	(83)
VOSH FO 1989-90	75	0	(75)
VOSH FO 1990-91	73	0	(73)
VOSH FO 1991-92	139	0	(139)
VOSH FO 1992-93	42	0	(42)
VOSH FO 1993-94	28	0	(28)
VOSH FO 1994-95	31	0	(31)
VOSH FO 1995-96	32	0	(32)
VOSH FO 1996-97	30	0	(30)
VOSH FO 1997-98	23	0	(23)
VOSH FO 1998-99	37	0	(37)
VOSH FO 1999-2000	33	0	(33)
VOSH FO 2000-01	37	0	(37)
VOSH FO 2001-02	51	0	(51)
VOSH FO 2002-03	99	0	(99)
VOSH FO 2005	106	0	(106)
VOSH FO 2006	63	0	(63)
VOSH FO 2007	65	0	(65)
VOSH FO 2008A	45	0	(45)
VOSH FO 2009	75	0	(75)
VOSH FO 2010	86	0	(86)
VOSH FO 2011	36	0	(36)
VOSH FO 2012	7	0	(7)
VOSH FO 2013	66	0	(66)
VOSH FO 2014	54	0	(54)
VOSH FO 2015	31	0	(31)
VOSH FO 2016	33	0	(33)

VOSH FO 2017	9	0	(9)
VOSH FO 2018	44	0	(44)
VOSH FO 2019	65	0	(65)
VOSH FO 2020	91	0	(91)
VOSH FO 2021	117	0	(117)

*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).