



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 85-120 – Regulations Governing the Licensure of Athletic Trainers
Department of Health Professions
January 11, 2008

Summary of the Proposed Amendments to Regulation

The Board of Medicine (Board) proposes to emend its Regulations Governing the Licensure of Athletic Trainers so that applicants for licensure will no longer have to provide documentation of education and successful completion of the required national examination. The Board also proposes to add an option for inactive licensure (with an attendant fee) for athletic trainers.

Result of Analysis

The benefits likely exceed the costs for all proposed changes.

Estimated Economic Impact

Currently, applicants for licensure as athletic trainers must provide, with their applications, proof that they have completed all required education and have passed the national examination for athletic trainers; Applicants must also provide proof of current National Athletic Trainers' Association Board of Certification (NATABOC) certification. In order to obtain NATABOC certification, applicant athletic trainers must prove that they have finished the required education and passed the national exam. Because of this, the Board proposes to eliminate the duplicative requirement that applicants for licensure provide separate proof of education and exam passage.

Applicants for initial licensure as athletic trainers, as well as applicants for license renewal, will likely marginally benefit from this regulatory change as they will not have to engage in recordkeeping separate from what is required for NATABOC. These recordkeeping

costs include costs for copying and mailing forms and papers as well as the value of time spent on these activities.

Current regulation requires athletic trainers to renew their licenses (fee – \$135) every two years. Licensees who plan to not work as athletic trainers for a time may either pay the fee for renewal every two years or allow their license to lapse and pay a reinstatement fee of \$180 (as well as provide proof of current NATABOC certification) when they decide to reenter their field. The Board proposes to add an inactive license to these regulations. This will allow individuals who do not plan to work as athletic trainers for at least two years to pay a \$70 inactive license fee rather than the \$135 fee for license renewal. When these individuals are ready to start working as athletic trainers again, the proposed regulations would require that they pay the difference between the inactive license fee and the license renewal fee (for the current renewal cycle) and provide proof of NATABOC certification or recertification.

This regulatory change will benefit licensees who plan on not working for a time (or at least not working as athletic trainers for a time). These individuals will save \$65 for every renewal cycle, but the last, that they are not working (in this field). The Department of Health Professions (DHP) does not know how many individuals would choose to take advantage of this regulatory change but does report that 4% of occupational therapists currently hold an inactive license.

Businesses and Entities Affected

The Department of Health Professions (DHP) reports that the Board currently licenses 842 athletic trainers. All of these licensees, as well as individuals who might choose to be athletic trainers in the future, will be affected by these proposed regulatory changes.

Localities Particularly Affected

No locality will be disproportionately affected by this proposed regulatory action.

Projected Impact on Employment

This regulatory action will likely have no impact on employment in the Commonwealth.

Effects on the Use and Value of Private Property

This regulatory action will likely have no affect on the use or value of private property in the Commonwealth.

Small Businesses: Costs and Other Effects

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

Small Businesses: Alternative Method that Minimizes Adverse Impact

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

Real Estate Development Costs

This regulatory action will likely have no affect on real estate development costs in the Commonwealth.

Legal Mandate

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 36 (06). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the regulation. The analysis presented above represents DPB's best estimate of these economic impacts.