

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Cemetery Board
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	18 VAC 47-20
<b>VAC Chapter title(s)</b>	Cemetery Board Rules and Regulations
<b>Action title</b>	2024 Cemetery Board Temporary Fee Reduction
<b>Date this document prepared</b>	May 30, 2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Exempt – Final (Action 6494 / Stage 10367)

### **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)**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>This action amends the provisions of the Cemetery Board Rules and Regulations related to fees in order to ensure that the financial needs of the Board are met while ensuring compliance with the Callahan Act (§ 54.1-113 of the Code of Virginia). The Callahan Act requires that Board revenues are sufficient, but not excessive, to cover the Board’s operating expenses.</p> <p>1. This action amends the regulation to lower the application fee for initial sales personnel licenses and registrations from \$60 to \$40 for the two year period starting August 1, 2024 and ending July 31, 2026.</p> <p>2. This action amends the regulation to lower the renewal and reinstatement fees for licenses and registrations for the two year period starting August 1, 2024 and ending July 31, 2026 as follows:</p> <table border="1" data-bbox="479 779 1414 1188"> <thead> <tr> <th>License Type</th> <th>Current Fee</th> <th>New Fee</th> </tr> </thead> <tbody> <tr> <td>Cemetery Company Renewal</td> <td>\$580</td> <td>\$285</td> </tr> <tr> <td>Sales Personnel Registration Renewal</td> <td>\$60</td> <td>\$30</td> </tr> <tr> <td>Cemetery Company License Reinstatement</td> <td>\$580</td> <td>\$370</td> </tr> <tr> <td>Sales Personnel Registration Reinstatement</td> <td>\$60</td> <td>\$45</td> </tr> </tbody> </table> <p>Direct Costs: Fee changes are considered transfer payments. There are no anticipated new monetizable direct costs associated with these changes to the regulations.</p> <p>Indirect Costs: There are no anticipated new monetizable indirect costs associated with these changes to the regulations.</p> <p>Direct Benefits: There are no anticipated monetizable direct benefits associated with these changes to the regulations.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits associated with these changes to the regulations.</p>		License Type	Current Fee	New Fee	Cemetery Company Renewal	\$580	\$285	Sales Personnel Registration Renewal	\$60	\$30	Cemetery Company License Reinstatement	\$580	\$370	Sales Personnel Registration Reinstatement	\$60	\$45
License Type	Current Fee	New Fee															
Cemetery Company Renewal	\$580	\$285															
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Sales Personnel Registration Reinstatement	\$60	\$45															
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>															
	<p>(a) \$0</p>	<p>(b) \$0</p>															

(3) Net Monetized Benefit	\$0
(4) Other Costs & Benefits (Non-Monetized)	
(5) Information Sources	DPOR Finance staff.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no new monetizable direct costs associated with maintaining the status quo.</p> <p>Indirect Costs: There are no new monetizable indirect costs associated with maintaining the status quo.</p> <p>Direct Benefits: There are no new monetizable direct benefits associated with maintaining the status quo.</p> <p>Indirect Benefits: There are no new monetizable indirect benefits associated with maintaining the status quo.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit		
(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.

**This change only impacts the regulated community, not local partners, and will not have an economic impact on local partners.**

**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)	<p>There are no anticipated direct or indirect costs to families. The fee reduction for sales personnel would likely impact families; however, the reduction is \$20 per biennium, or approximately \$0.80 per month in cost savings. It is unlikely that this amount will make any noticeable difference for the family of sales personnel.</p> <p>Direct Benefits: There are no anticipated direct benefits as a result of the regulation.</p> <p>Indirect Benefits: An indirect benefit of the regulation is a decrease in fee amounts paid by regulants.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(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)	See Table #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).
(4) Alternatives	This regulatory change is required in order to comply with the Callahan Act (§ 54.1-113 of the Code of Virginia). Therefore, no alternatives were considered.
(5) Information Sources	

## Changes to Number of Regulatory Requirements

**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	Additions	Subtractions	Total Net Change in Requirements
20-70	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
20-140	(M/A):	0	0	0	0
	(D/A):	2	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	0	0
<b>Grand Total of Changes in Requirements:</b>					(M/A): 0 (D/A): 0 (M/R): 0 (D/R): 0

### **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
20-70	Application fees for initial cemetery company license; addition of a cemetery; and registration	Sales personnel initial registration: \$60 per cemetery	Sales personnel initial registration: \$40 per cemetery  Application fee is temporarily	Sales personnel initial registration: -\$20 (-33%)

	of sales personnel.		reduced for all applications received from 8/1/24 through 7/31/26.	
20-140	Application fees for renewal of cemetery company licenses and sales personnel registrations.  Application fees for reinstatement of cemetery company licenses and sales personnel registrations.	Cemetery company renewal: \$580 per cemetery  Sales personnel renewal: \$60 per cemetery  Cemetery company reinstatement: \$580 per cemetery  Sales personnel reinstatement: \$60 per cemetery	Cemetery company renewal: \$285 per cemetery  Sales personnel renewal: \$30 per cemetery  Cemetery company reinstatement: \$370 per cemetery  Sales personnel reinstatement: \$45 per cemetery	Cemetery company renewal: -\$295 (-51%)  Sales personnel renewal: -\$30 (-50%)  Cemetery company reinstatement: -\$210 (-36%)  Sales personnel reinstatement: -\$15 (-25%)

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

<b>VAC Section(s) Involved*</b>	<b>Description of Regulatory Change</b>	<b>Overview of How It Reduces or Increases Regulatory Burden</b>
N/A	N/A	N/A

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

<b>Title of Guidance Document</b>	<b>Original Word Count</b>	<b>New Word Count</b>	<b>Net Change in Word Count</b>
N/A	N/A	N/A	N/A

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