

**Agency Response to Economic Impact Analysis Performed by the Virginia Department of Planning and Budget:**

Generally concur with the following exceptions:

The Board does not agree with DPB's assertion that the requirement of current references within the last five years will add to the administrative costs of the overall application process. Applicants are only required to list three references and the Board contends that an applicant should have an easier time of locating recent references than tracking down older references.

The Board does not agree with DPB's assertion that withholding services to regulants who owe fees, increasing the fee for wall certificates, and requiring more recent references will add to the compliance costs. The withholding of services is based on Board costs and monetary penalties already assessed to a regulant through a final or consent order. These orders are the result of a regulant's violation of regulation or statute which could potentially endanger the health, safety or welfare of the public. The Board's mission is to protect the health, safety and welfare of the public and, to ensure that, the Board requires compliance with these orders before granting continued licensure.

The increase in fees for wall certificates is for duplicates only and was an agency-wide initiative, not a Board-level decision. The first wall certificate is already part of the licensing fee and is provided at no additional charge.