

Office of Regulatory Management
Economic Review Form

Agency name	Department of Fire Programs
Virginia Administrative Code (VAC) Chapter citation(s)	19VAC15
VAC Chapter title(s)	Department of Fire Programs
Action title	Live Fire Training Structure Grant
Date this document prepared	September 3, 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)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: There are no expected direct costs with this proposed change.</p> <p>Indirect Costs: No indirect costs are expected. This action will remove the document as a Guidance Document to align with relevant language in the Code of Virginia. It will not alter costs for regulants or the agency.</p> <p>Direct Benefits: The proposed change would remove this as a Guidance Document, thus decreasing the hours dedicated to regulatory oversight. It will also align VDFP Guidance Documents with relevant sections of the Code of Virginia.</p> <p>Indirect Benefits: Changes or additions made to the grant policy would be more streamlined when requested by stakeholders by removing them as Guidance Documents.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) Undetermined</p>	<p>(b) Reduction in agency oversight costs are expected upon removal as a Guidance Document.</p>
<p>(3) Net Monetized Benefit</p>	<p>\$0</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>This change aligns VDFP with §2.2-4101 and §2.2-4002.1 of the Code of Virginia. The Virginia Fire Services Board should be better able to enact changes to grant programs as was done historically.</p>	
<p>(5) Information Sources</p>	<p>Department of Fire Programs.</p>	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: There are no expected direct costs related to the status quo.</p> <p>Indirect Costs: Indirect costs related to the status quo are related to costs accrued by the agency to manage regulatory programs. The agency would also be utilizing Guidance Documents that do not align with relevant code sections.</p> <p>Direct Benefits: This program would continue to receive the full oversight of the Commonwealth as a regulatory document. However, this does not align with current definitions in the code.</p>	
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	Indirect Benefits: There are no indirect benefits with this Guidance Document as is.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	The costs and benefits of maintaining regulatory oversight instead of changing to an agreement between the agency and the voluntary grant recipient.	
(5) Information Sources	Commonwealth of Virginia. Department of Fire Programs.	

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

There are no alternative approaches to the proposed change. The program either remains as a regulatory document or it becomes an agreement managed by VDFP. There are no other ways for administering this program under current code language. [§38.2-401:D].

Impact on Local Partners

Please see the comments above referring to stakeholders. These stakeholders are local governments receiving grants on behalf of volunteer and career fire departments.

Impacts on Families

This guidance document does not affect the cost or accessibility of food, energy, housing, transportation, healthcare, education, or any other good or service that is especially important to families. This policy only applies to the reporting of fire incidents under VFIRS.

Impacts on Small Businesses

The Department of Fire Programs does not foresee any impact on small business because this policy only applies to local fire departments who wish to report through VFIRS and NFIRS. Small businesses are not regulants included under this guidance document.

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
	(M/A):	0	0	0	0
	(D/A):	2	0	2	-2
	(M/R):	0	0	0	0
	(D/R):	22	0	22	-22
Grand Total of Changes in Requirements:					(M/A):0
					(D/A):2
					(M/R):0
					(D/R):22

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

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
Live Fire Training Structure Grant Program	Removal of the complete Guidance Document to align with §2.2-4101 and §2.2-4002.1 of the Code of Virginia. The document will remain, in a more limited fashion, to ensure internal grant processes are followed.	This reduced regulatory burden by removing it as a Guidance Document. It will remain as a grant policy outlining expectations of both the agency and the voluntary grant recipient.

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

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count
Live Fire Training Structure Grant Program	5796	0	-5796