

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Virginia Department of Health
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	12 VAC 5-450
<b>VAC Chapter title(s)</b>	Rules and Regulations Governing Campgrounds
<b>Action title</b>	Fast-track Amendments: Temporary Campground Water Quality/Hand Washing Sinks
<b>Date this document prepared</b>	Original: October 25, 2022 Revised: December 9, 2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Fast-Track

**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><b>This action would exempt portable hand washing sinks from the requirement that any tanks, hoses, or appurtenances that are used to distribute water shall be of food grade construction Temporary Campgrounds (12VAC5-450-187).</b></p> <p><b>Direct Costs:</b> The only potential direct cost associated with the proposed change would be the purchasing of the signage to be required if a temporary campground uses portable hand washing sinks without food-grade water equipment. On average the sign is \$16.00.</p> <p><b>Indirect Costs:</b> The agency is unable to determine possible indirect costs associated with the proposed regulatory change as the change would reduce restrictions on providing portable hand washing sinks and therefore improve and increase the ability for use at temporary campgrounds.</p> <p><b>Direct Benefits:</b> As hand washing is a primary component to reducing communicable disease, it is not the intention of the Virginia Department of Health to prohibit or discourage handwashing. The benefit is the allowance to use equipment that is more in line with industry standard and less burdensome to the regulant population, while protecting the public through encouraging handwashing, ensuring portable hand washing sinks meet adequate disinfection requirements, and requiring signage informing the public that water used for hand washing is not for human consumption. The use of portable hand washing sinks is not required at temporary campgrounds, however, if used, the campground operator must comply with regulatory requirements that currently restrict the water equipment to certain standards and potentially increase the cost burden to provide a public health amenity that many campground operators and patrons want or expect at a temporary campground. In the settings of temporary campgrounds, temporary hand washing sinks, when used, provide extra sanitation for campers using portable toilets, but are not used as drinking water fountains.</p> <p><u>Cost Calculation</u></p> <ul style="list-style-type: none"> <li>• Average cost of portable food-grade sink: \$1,519 Number of temporary campgrounds as of September 2022: 35 (\$1,519 * 35=\$53,165) *This is an estimate at a rate of one food-grade sink per temporary campground</li> <li>• Average cost of portable non food-grade sink: \$1,031.25 Number of temporary campgrounds as of September 2022: 35</li> </ul>
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	<p>(\$1,031.25 * 35=\$36,093.75)                  *This is an estimate at a rate of one non food-grade sink per temporary campground</p> <ul style="list-style-type: none"> <li>The difference in costs of portable food-grade and nonfood grade sinks: <b>\$17,071.25 yearly or \$487.75 per unit</b></li> </ul> <p><b>Indirect Benefits:</b> Indirect benefits include removing the burden of complying with outdated requirements that do not align with current industry practices and added clarity to operational requirements that improve campground performance and protection of the health and safety of campers and the public. In addition, campground operators and companies that supply portable sanitation facilities may save an average of \$488 per portable sink by not replacing existing sinks that do not meet existing regulatory requirements.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Direct Costs: \$5,600 (at \$16 per sign x ~35 temporary campgrounds per year x 10 years)	(b) Direct Benefit: \$170,713 (at \$487.76 per unit x ~35 temporary campgrounds per year x 10 years)
(3) Net Monetized Benefit	\$145,070 (at direct benefit present value of \$149,990 – direct cost present value of \$4,920)	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	<p>Monetary value of portable hand washing sinks gathered from online research (Poly John, MOBI, Monsam, Cambro, and Regency) and industry representative outreach (Crown Verity, Satellite,) to determine food grade construction and estimated cost per unit.                  The chart below provides additional information on the various types of handwashing stations and their costs.                  ”USDA” means United States Department of Agriculture                  “FDA” means Food and Drug Administration                  “NSF” means National Science Foundation</p>	

Manufacturer	USDA Food Grade?	FDA Food Grade?	NSF Listed?	Average Cost?
PolyJohn	No	No	No	\$700
Crown Verity	No	Yes	Yes-NSF/ANSI-2	\$1600
MOBI	No	No	No	\$525
Monsam	No	Yes	Yes	\$2191
Satellite	No	Yes-Resin Only	Yes-Resin Only	\$766
Cambro	No	No	No	\$1200
Regency	No	No	No	\$1700

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p><b>Current regulations for temporary campgrounds require that any tanks, hoses, or appurtenances that are used to distribute water shall be of food grade construction.</b></p>
	<p><b>Direct Costs:</b> Current industry design of the majority of portable hand washing sinks do not meet current regulatory construction requirements through standard materials and design, and may in effect discourage the use of such sinks, and thus prohibit or discourage handwashing at temporary campgrounds. The agency is unable to determine the direct monetary cost of reduced hand washing at temporary campgrounds but attests that the reduction of hand washing may jeopardize the safety, health and welfare of the public. Requiring portable hand washing sinks to be food grade would limit campground operators to select vendors, and may in effect, limit and target the market to specific providers. The ability to determine if a portable hand washing sink is of food grade construction can be difficult as various components of the sink design may be of different materials and certification, further burdening the industry on meeting compliance with the regulation.</p>
	<p><u>Cost Calculation</u></p> <ul style="list-style-type: none"> <li>Average cost of portable food-grade sink: \$1,519</li> <li>Number of temporary campgrounds as of September 2022: 35</li> </ul>

	<p>(\$1,519 * 35=\$53,165)                  *This is an estimate at a rate of one food-grade sink per temporary campground.</p> <p><b>Indirect Costs:</b> Indirect costs may include unnecessary operational burden on temporary campground operations related to portable hand washing sinks. Maintaining the status quo could result in campground operators or companies that supply portable sanitation facilities having to replace existing sinks that do not meet existing regulatory requirements.</p> <p><b>Direct Benefits:</b> The agency did not identify a direct benefit of maintaining the current regulation related to portable hand washing sinks at temporary campgrounds.</p> <p><b>Indirect Benefits:</b> No indirect benefits were identified if the regulations were retained.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Direct Costs: \$531,650 (at \$53,165 per year x 10 years)	(b) Direct Benefits: \$0
(3) Net Monetized Benefit	-\$467,113 (at direct benefit present value of \$0 – direct cost present value of \$467,113)	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	Table 1.a(6)	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p><b>This action requires the posting of a sign to inform the public the water in a portable handwashing station is not for human consumption. One alternative to the proposed regulations to remove the requirement of signage informing the public the water in a portable hand washing station is not for human consumption. Temporary Campgrounds (12VAC5-450-187).</b></p> <p><b>Direct Costs:</b> No direct quantitative costs were identified if the above proposed alternative is adopted. However, the consumption of water not intended for human consumption may lead to the transmission of disease, and without signage,</p>
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	<p>the public may drink water from the sinks. Waterborne infection and diseases could result in significant burden on health and healthcare spending<sup>1</sup>.</p> <p><b>Indirect Costs:</b> The agency is unable to determine any indirect cost associated with adopting the proposed alternative.</p> <p><b>Direct Benefits:</b> The average cost of a sign is \$16.00.</p> <p><b>Indirect Benefits:</b> The agency is unable to determine any indirect benefit associated with adopting the proposed alternative.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Direct Costs: \$0	(b) \$5,600 (at \$16 per sign x ~35 temporary campgrounds per year x 10 years)
(3) Net Monetized Benefit	\$4,920	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	<p><sup>1</sup><a href="#">Collier, Sarah A et al. “Estimate of Burden and Direct Healthcare Cost of Infectious Waterborne Disease in the United States.” Emerging infectious diseases vol. 27,1 (2021): 140-149. doi:10.3201/eid2701.190676</a></p>	

**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)	<p><b>Direct Costs:</b> Local partners or authorities such as the Virginia Restaurant, Lodging and Travel Association or Virginia Campground Association may be affected by this action in regards to notification and support to their constituents. Local and tribal governments, school divisions or other authorities are likely not affected by this action, unless they implement a local ordinance or other code specific to temporary campground facilities and portable hand washing provisions.</p> <p><b>Indirect Costs:</b> The agency is unable to determine any indirect cost to local partners associated with this proposed amendment.</p> <p><b>Direct Benefits:</b> No indirect benefits were identified for local partners.</p>
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	<p><b>Indirect Benefits:</b> Potential indirect benefits to local partners associated with this proposed amendment may include improved public health protections during temporary events that involve permitted temporary campgrounds. The ability to easily provide portable hand washing sinks could improve event operations and public perception and approval through the providing of hand washing opportunities that increases public comfort and trust of an event, location, and community partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	N/A	

**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><b>Direct Costs:</b> The agency did not identify any direct costs to families related to the proposed amendment.</p> <p><b>Indirect Costs:</b> The agency is unable to determine the indirect cost to families regarding the proposed amendment.</p> <p><b>Direct Benefits:</b> The agency did not identify any direct benefits to families related to the proposed amendment.</p> <p><b>Indirect Benefits:</b> The potential indirect benefits to families could include increased opportunities to wash hands during temporary camping events and thus improve the health and safety of the family.</p>
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	N/A	

**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)	<p><b>Direct Costs:</b> The agency did not identify any direct costs to small businesses related to this change.</p> <p><b>Indirect Costs:</b> The agency did not identify any indirect costs to small businesses associated with the change.</p> <p><b>Direct Benefits:</b> The direct benefits of amending the regulations to small businesses may include less regulatory burden, and therefore less potential cost to provide a public health amenity at temporary campgrounds that is often expected by the public. The agency is recommending the regulation be amended to minimize the economic impact on small businesses while maintaining appropriate regulatory standards to ensure the safety, health, and welfare of the public.</p> <p><b>Indirect Benefits:</b> Indirect benefits may include the removal of unnecessary operational burden on temporary campground operations that could be reduced or removed through the proposed amendments. Amending the regulations may also reduce expenditures necessary to meet the current regulatory requirements.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	



(4) Alternatives	<p>Alternatives to an amendment would include no action and to retain the regulation as is. As stated, this lack of change may maintain a status quo that is burdensome for the campground industry and small business. Review and consideration of amendments to the regulations is the only way for Virginia to stay current with industry standards and to ensure that the agency’s statutory requirements are executed in the least burdensome and most efficient and cost-effective manner possible while protecting the health, safety and welfare of the citizens of Virginia.</p>
(5) Information Sources	<p>N/A</p>

**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
12VAC5-450-187	(M/A):	0			
	(D/A):	0			
	(M/R):	0			
	(D/R):	31	1	1	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
12VAC-450-187.2.c	Removes requirement that handwashing sinks be of food grade construction. Requires a sign IF portable hand washing sinks that are not of food grade construction are used	\$1,519	\$1,047.25	Potential cost decrease around \$471 for non food-grade sinks. Includes \$16 cost for required signage.

*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>
12VAC5-450-187.2.b	Exemption provides that portable hand washing sinks do not have to be of food-grade construction	Reduces regulatory burden on regulated community by allowing industry standard portable hand washing sinks that are not certified or otherwise identified as having all components constructed with food grade materials.
12VAC5-450-187.2.c	Requires that if portable handwashing sinks are provided that are not of food grade construction, that a sign be displayed stating “Hand washing water is not for drinking.”	Provides a means to use portable hand washing sinks that are not of food grade construction while continuing to protect public health through notification (signage).