

Office of Regulatory Management
Economic Review Form

Agency name	Board for Branch Pilots
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 45-20
VAC Chapter title(s)	Board for Branch Pilots Regulations
Action title	General Review of Board for Branch Pilots Regulations
Date this document prepared	August 13, 2024 (revised February 13, 2025)
Regulatory Stage (including Issuance of Guidance Documents)	Proposed (Action 6338 / Stage 10457)

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>1. This action adds a provision that allows branch pilots who have a full pilot branch license for the branch of Sea to Wolf Trap to qualify for an extension of route for the waters of the Chesapeake Bay from Wolf Trap to Smith Point, without requiring a federal first class pilot endorsement. Currently, an applicant must first acquire the Federal First Class Pilot endorsement and then pass the branch pilot exam.</p> <p>2. This action provides that a licensee must ensure that a medical review officer (MRO) performs the duties and responsibilities assigned by the regulation.</p> <p>3. This action eliminates requirements that are not necessary to protect the health, safety, and welfare of the public, and seeks to provide clarity throughout the regulation, making the regulation easier to understand.</p> <p>Direct Costs: There are no additional monetizable direct costs associated with the regulatory change.</p> <p>Indirect Costs: There are no additional monetizable indirect costs associated with the regulatory change.</p> <p>Direct Benefits: There are no additional monetizable direct benefits associated with the regulatory change.</p> <p>Indirect Benefits: There are no additional monetizable indirect costs associated with the regulatory change.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$0</p>
<p>(3) Net Monetized Benefit</p>	<p>\$0</p>	
<p>(4) Other Costs & Benefits (Non-</p>	<p>Costs:</p> <ul style="list-style-type: none"> Licensees, who are regulants, would be responsible for ensuring that the MRO performs the duties assigned for an MRO in the regulation. <p>Benefits:</p>	

Monetized)	<ul style="list-style-type: none"> A new licensee who seeks to extend a license and qualifies for the exemption from obtaining a USCG First Class Pilot endorsement would save on the application fee (estimated to be \$190) and other associated costs.
(5) Information Sources	<p>Agency staff.</p> <p>National Maritime Center – Frequently Asked Questions: Fees</p> <p>https://www.dco.uscg.mil/Portals/9/NMC/pdfs/faq/fees_faq.pdf?ver=VLrPINyU178Lhs9alQxVpw%3d%3d&timestamp=1713898023460</p>

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	\$0	
(4) Other Costs & Benefits (Non-Monetized)	There are no new non-monetizable costs or benefits associated with maintain the status quo.	
(5) Information Sources	Agency staff.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	See Box #4.
--	-------------

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	No less intrusive alternative approaches were identified in the development of this action.	
(5) Information Sources	Agency staff.	

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)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated direct or indirect costs to local partners. There are no anticipated direct or indirect benefits to local partners.	
(4) Assistance	N/A	
(5) Information Sources	Agency staff.	

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)	See Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated direct or indirect costs to families. There are no anticipated direct or indirect benefits to families.	
(4) Information Sources	Agency staff.	

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 Box #3.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>As noted in the ABD, branch pilot licenses are issued to individuals. Licensed branch pilots are self-employed. To the extent licensed branch pilots are independent contractors, and considered to be business entities, these entities may fall within the meaning of “small business” as defined in § 2.2-4007.1 of the Code of Virginia.</p> <p>The costs and benefits of this regulatory change are identified in Table 1(a). To the extent that any additional costs are assumed by a small business entities, this regulatory change would impact small businesses.</p>	

(4) Alternatives	N/A
(5) Information Sources	Agency staff.

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
20-10	(M/A):	0	0	0	0
	(D/A):	4	0	0	0
	(M/R):	7	0	0	0
	(D/R):	11	1	2	-1
20-20	(M/A):	1	0	0	0
	(D/A):	2	0	0	0
	(M/R):	4	0	0	0
	(D/R):	14	2	2	0
20-40	(M/A):	0	0	0	0
	(D/A):	2	0	0	0
	(M/R):	0	0	0	0
	(D/R):	23	0	6	-6
Grand Total of Changes in Requirements:					(M/A): 0 (D/A): 0 (M/R): 0 (D/R): -7

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
20-30	Branch pilots must have a First Class Pilot endorsement	\$190	\$0	Total savings to qualifying individuals is \$190. A cost

	<p>issued by the USCG in order to extend (add a branch to) a branch pilot license.</p> <p>The change would allow branch pilots who have a full pilot branch license for the branch of Sea to Wolf Trap to qualify for an examination for a full branch pilot license for the waters of the Chesapeake Bay from Wolf Trap to Smith Point, without requiring a federal first class pilot endorsement.</p>			<p>burden reduction of 100%.</p> <p>The change applies to one D/R requirement in the section; resulting in a reduction of 1 D/R.</p>
--	---	--	--	--

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
20-30	<p>Branch pilots must have a First Class Pilot endorsement issued by the USCG in order to extend (add a branch to) a branch pilot license.</p> <p>The change would allow branch pilots who have a full pilot branch license for the branch of Sea to Wolf Trap to qualify for an examination for a full branch pilot license for the</p>	<p>This change reduces the burden of the extension of route requirements for individuals who will undertake the route. This reduces D/R requirements in the section by 33%. There are 3 D/R requirements in the section, resulting in a reduction of 1 D/R.</p>

	waters of the Chesapeake Bay from Wolf Trap to Smith Point, without requiring a federal first class pilot endorsement.	
--	--	--

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
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).