

Office of Regulatory Management
Economic Review Form

Agency name	Board for Hearing Aid Specialists and Opticians
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 80-30
VAC Chapter title(s)	Optician Regulations
Action title	Approved Related Technical Instruction
Date this document prepared	July 14, 2023 (Revised September 12, 2023)
Regulatory Stage (including Issuance of Guidance Documents)	Guidance Document Revision

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>Under the regulation, an applicant for an optician license can meet the education requirement for licensure by completing a two-year apprenticeship that includes related technical instruction through an apprenticeship program registered with the Department of Labor and Industry (DOLI) and approved by the Board.</p> <p>The proposed amendment to the guidance document adds the Optician Development Program offered by the Optical Training Institute as a Board-approved program. Adding the Optician Development Program offers another low-cost option for registered apprentices to complete the related technical instruction.</p> <p>Direct Costs: There are no additional monetizable direct costs associated with this amended guidance document.</p> <p>Indirect Costs: There are no additional monetizable indirect costs associated with this amended guidance document.</p> <p>Direct Benefits: There are no additional monetizable direct benefits associated with this guidance document.</p> <p>Indirect Benefits:</p> <ul style="list-style-type: none"> • Between August 1, 2020, and August 1, 2023, approximately 90 optician applicants out of 120 applied for a license by completing an apprenticeship. <ul style="list-style-type: none"> ○ The average number of apprenticeship applicants is 30 per year. • The average cost of the related technical instruction coursework using the current providers is approximately \$2,030 per apprentice. <ul style="list-style-type: none"> ○ Cost per year for apprenticeship applicants: \$60,900. • With the addition of Optical Training Institute as an approved apprenticeship program, the average cost of the related technical instruction would be \$1,750 per apprentice. This would be an average cost-saving of \$280 to each apprentice. <ul style="list-style-type: none"> ○ Cost per year for apprenticeship applicants: \$52,500. • Total savings for apprenticeship applicants: \$8,400 per year. <ul style="list-style-type: none"> ○ Current cost (\$60,900) minus future cost (\$52,500). • The change is a reduction of approximately 14% from current average apprenticeship cost. 	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

	(a) \$0	(b) \$39,624
(3) Net Monetized Benefit	\$39,624	
(4) Other Costs & Benefits (Non-Monetized)	<p>The main benefit of this amendment to the Guidance Document is to regulated parties and the public. By adding Optical Training Institute, an additional program is approved for registered apprentices to fulfill their requirements for related technical instruction. This amendment expands the opportunities available to apprentices.</p> <p>An indirect benefit of this amendment is the positive impact it may have on Optical Training Institute. As a Board-approved program, the educational institution may attract more apprentices to its program and may experience increased revenue. Further, additional training options may lead to higher quality services, and more innovation.</p>	
(5) Information Sources	Board for Hearing Aid Specialists and Opticians program staff.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>There are no additional monetizable direct or indirect costs associated with maintaining the status quo.</p> <p>There are no additional monetizable direct or indirect benefits 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 additional costs or benefits associated with maintaining the status quo.	
(5) Information Sources		

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

The guidance document does not impose regulatory obligations on regulated parties. The board did not consider a third option when it considered the change to the guidance document.

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>There are no monetizable direct or indirect costs to local partners associated with amending this guidance document.</p> <p>There are no monetizable direct or indirect benefits to local partners associated with amending this guidance document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>DOLI may assume costs as a result of this proposed change if it needs to update any materials used to advertise or conduct the Optician Registered Apprentice Program.</p> <p>As a result of this change, more individuals may choose to become registered apprentices or sponsor a registered apprenticeship program.</p>	
(4) Assistance	N/A	
(5) Information Sources	Board for Hearing Aid Specialists and Opticians program 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) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated costs or benefits to families resulting from amending this guidance document.	
(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)	<p>Optician licenses are issued to individuals, and not to business entities. However, many licensed opticians are likely owners or employees of business entities that meet the definition of "small business" in § 2.2-4007.1 of the Code of Virginia. Programs that provide DOLI-registered apprenticeships approved by the Board may fall within the meaning of "small business."</p> <p>The costs and benefits of this regulatory change are identified in Table 1(a). To the extent that additional costs are assumed by a small business entities, this regulatory change would impact small businesses.</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	N/A	
(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)/Guidance Document Involved	Authority of Change	Initial Count	Additions	Subtractions	Net Change
30-20/ Guidance Document 6652 - Opticians Approved Related Technical Instruction	Statutory:	0	0	0	0
	Discretionary:	0	0	0	0

*Cost Reductions or Increases (if applicable)**

VAC Section(s)/Guidance Document Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
30-20/ Guidance Document 6652 - Opticians Approved Related Technical Instruction	Applicants for licensure must complete either (i) a Board-approved two-year course in a school of opticianry; or (ii) two-year apprenticeship, including all	Average cost for an apprenticeship program is approximately \$2,030 per apprentice.	Average cost for an apprenticeship program would be \$1,750 per apprentice.	<ul style="list-style-type: none"> The change is a reduction of approximately 14% from current average apprenticeship cost. This would be an average cost-saving of

	<p>required related technical instruction, approved by the Board.</p> <p>The guidance document lists Board-approved apprenticeship providers.</p>			<p>\$280 to each apprentice.</p> <ul style="list-style-type: none"> The VAC section to which this guidance document applies, 18VAC80-30-20, includes 15 discretionary requirements that apply to regulated parties.
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** The applicable section of VAC is not amended as a result of this action. The action provides for the addition of an approved apprenticeship program by amending an existing guidance document.*

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
N/A	N/A	N/A

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

Title of Guidance Document	Original Length	New Length	Net Change in Length
18 VAC 80-30-20 Approved Related Technical Instruction	One page	One page	Three lines