

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12VAC5-481
VAC Chapter title(s)	Virginia Radiation Protection Regulations
Action title	Guidance Document Amendments for ORH-734
Date this document prepared	4/2/2024
Regulatory Stage (including Issuance of Guidance Documents)	Guidance document repeal

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)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>This action is to repeal ORH-734 which contains information for operators using PET/CT units. The language in this document exceeds the purpose and authority of a guidance document by granting individuals with certification granted by the Nuclear Medicine Technology Certification Board and training by a PET/CT vendor to be deemed authorized to operate the PET/CT unit.</p> <p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action.</p> <p>Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.</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)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action.</p> <p>Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.</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)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action.</p> <p>Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.</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)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(5) Information Sources	12VAC5-481	

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>Direct Costs: No direct costs to local partners are associated with this action.</p> <p>Indirect Costs: No indirect costs to local partners are associated with this action.</p> <p>Direct Benefits: No direct benefits to local partners are associated with this action.</p> <p>Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(4) Assistance	No assistance to or from local partners is required as a result of the repeal of this guidance document.	
(5) Information Sources	12VAC5-481	

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>Direct Costs: No direct costs to families are associated with this action.</p> <p>Indirect Costs: No indirect costs to families are associated with this action.</p> <p>Direct Benefits: No direct benefits to families are associated with this action.</p>	
--	---	--

	Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	
(4) Information Sources	12VAC5-481	

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>Direct Costs: No direct costs to small businesses are associated with this action.</p> <p>Indirect Costs: No indirect costs to small businesses are associated with this action.</p> <p>Direct Benefits: No direct benefits to small businesses are associated with this action.</p> <p>Indirect Benefits: This action will repeal ORH-734 in order to adhere to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include adhering to the purpose and scope of a guidance document as defined by the Virginia Register of Regulations.	

(4) Alternatives	Alternatives to this action include retaining ORH-734 as is. ORH believes ORH-734 exceeds the authority and purpose of a guidance document as defined by the Virginia Register of Regulations.
(5) Information Sources	12VAC5-481

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	Initial Count	Additions	Subtractions	Net Change
ORH-734	0	0	0	0

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

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

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

Title of Guidance Document	Original Length	New Length	Net Change in Length