

Office of Regulatory Management  
Economic Review Form

|   |   |
|---|---|
| <b>Agency name</b>  | Board of Pharmacy, Department of Health Professions   |
| <b>Virginia Administrative Code (VAC) Chapter/Guidance Document citation(s)</b> | 18VAC110<br>110-9                                     |
| <b>Guidance Document title(s)</b>   | Pharmacy Inspection Deficiency Monetary Penalty Guide |
| <b>Action title</b>   | Revision of Guidance Document 110-9                   |
| <b>Date this document prepared</b>  | March 30 <sup>th</sup> , 2023                         |
| <b>Regulatory Stage (including Issuance of Guidance Documents)</b>              | N/A   |

**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) | There are no direct or indirect costs or benefits associated with this guidance document revision. This change adds a regulation reference that was previously left out. |                            |
| (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)         | None   |                            |
| (5) Information Sources                            |  |                            |

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

|  |   |                            |
|--|---|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no monetary impact under the status quo. |                            |
| (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)         | None  |                            |
| (5) Information Sources                            |   |                            |

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

|  |  |
|--|--|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no alternative approach to consider. The only way to amend a guidance document is through board action. |
|--|--|

|  |                         |                            |
|--|-------------------------|----------------------------|
| Benefits (Monetized)                       |                         |                            |
| (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) | None                    |                            |
| (5) Information Sources                    |                         |                            |

**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) | There is no impact on local partners. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs               | Direct & Indirect Benefits |
|  | (a) N/A                               | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | None                                  |                            |
| (4) Assistance                                     | None                                  |                            |
| (5) Information Sources                            |                                       |                            |

**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) | There is no impact on families. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs         | Direct & Indirect Benefits |
|  | (a) N/A                         | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | None                            |                            |
| (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) | There is no impact on small businesses. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                 | Direct & Indirect Benefits |
|  | (a) N/A                                 | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | None                                    |                            |
| (4) Alternatives                                   | None                                    |                            |
| (5) Information Sources                            |   |                            |

**Changes to Number of Regulatory Requirements**

*For each individual VAC Chapter amended, repealed, or promulgated by this regulatory action, list (a) the initial requirement count, (b) the count of requirements that this regulatory package is adding, (c) the count of requirements that this regulatory package is reducing, (d) the net change in the number of requirements. This count should be based upon the text as written when this stage was presented for executive branch review. Five rows have been provided, add or delete rows as needed. In the last row, indicate the total number for each column.*

**Table 5: Total Number of Requirements** \*This is a guidance document change, and as guidance documents have no requirements or regulations contained within, there is nothing to include in this chart. Requirements related to this Board can be found in Chapters 20, 21, 30, 40, 50, and 60 of 18VAC110\*

|                | Number of Requirements |           |              |            |
|----------------|------------------------|-----------|--------------|------------|
| Chapter number | Initial Count          | Additions | Subtractions | Net Change |
|                |                        |           |              |            |
|                |                        |           |              |            |
|                |                        |           |              |            |
|                |                        |           |              |            |
|                |                        |           |              |            |
| <b>TOTAL</b>   |                        |           |              |            |