

**Regulations Governing Virginia Physician Loan Repayment Program (12 VAC5-508)
Fast Track Amendments
Virginia Department of Health (VDH) Response to Economic Impact Analysis (EIA)**

VDH generally concurs with the result of the EIA analysis, specifically that the benefits likely outweigh costs for most proposed regulatory changes.

VDH has no significant disagreement with the statement contained in the EIA that, if this program becomes funded again in the future, increasing the loan repayment amount could reduce the number of physicians participating and/or increase the need for more appropriated dollars to meet the needs of the applications for the program.

However, VDH believes that it is questionable for the EIA to identify as an adverse impact that community members will receive a 20 percent reduction in access to these physicians. VDH notes that the proposed amendment to the definition of “full time” at 12VAC5-508-10, from 40 hours to 32 hours, is not intended to be strictly interpreted that the physician can only work 32 hours. Thirty two hours as full time status is a reflection of the industry standard “floor” of what constitutes full time hours, and not the “ceiling” on the number of hours that may be worked. Each physician employment contract is different and will vary based upon specialty and facility of employment.