

Office of Regulatory Management
Economic Review Form

Agency name	Department of Housing and Community Development
Virginia Administrative Code (VAC) Chapter citation(s)	Guidance Document
VAC Chapter title(s)	NA
Action title	Virginia Telecommunication Initiative 2024 Program Guidelines and Criteria
Date this document prepared	July 2023
Regulatory Stage (including Issuance of Guidance Documents)	Revised Guidance Document

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.

Agency Note: The changes considered are primarily a result of Virginia receiving federal Broadband Equity Access and Deployment (BEAD) funding. The changes will permit the flexibility to use state general funds and federal funds as efficiently and effectively as possible. Changes also address the potential impact permitting and make-ready delays have on project applicants.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. None expected.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. None expected.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Additional flexibility for program participants, permits the most efficient use of state and federal broadband funding. The precise monetary benefit is indeterminate at this time.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. Additional flexibility for program participants, permits the most efficient use of state and federal broadband funding. The precise monetary benefit is indeterminate at this time.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) NA	(b) NA
(3) Net Monetized Benefit	NA	
(4) Other Costs & Benefits (Non-Monetized)	NA	
(5) Information Sources	NA	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. May not be able to effectively utilize all resources.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. May not be able to effectively utilize all resources.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Will allow effective utilization of all resources.</p>	
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	Indirect Benefits: Describe the indirect benefits of the proposed change. Will allow effective utilization of all resources.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) NA	(b) NA
(3) Net Monetized Benefit	NA	
(4) Other Costs & Benefits (Non-Monetized)	NA	
(5) Information Sources	NA	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Describe the direct costs of this proposed change here. NA Indirect Costs: Describe the indirect costs of the proposed change. NA Direct Benefits: Describe the direct benefits of this proposed change here. NA Indirect Benefits: Describe the indirect benefits of the proposed change. NA	
(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)	N/A	

(5) Information Sources	N/A
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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: Describe the direct costs of this proposed change here. None expected.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. None expected.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Context on flexibility for navigating BEAD and state General Fund VATI will assist local partners as they plan for how to extend service to all remaining unserved and underserved locations in their jurisdiction. Additionally local partners will benefit from attention specifically being directed towards methods for mitigating permitting and/or make ready delays. Dates and time periods have been changed throughout the document to adjust to FY24 cycle and timeline, which will provide clarity and structure to local partners as they develop VATI applications.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. Local partners will indirectly benefit from a clear and defined VATI process that delineates how BEAD and VATI state general funding can work in concert to reach universal coverage.</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) Assistance	N/A	

(5) Information Sources	N/A
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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: Describe the direct costs of this proposed change here. None expected.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. None expected.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Families will not be directly affected by the proposed changes.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. Households unserved by broadband will benefit from localities that are better able to navigate BEAD and state General Fund sources of funding for supporting broadband infrastructure projects. The same households will benefit indirectly from applicants addressing concerns related to make-ready and permitting delays in their applications, as successful projects will be sounder for having accounted for potential delays.</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) Assistance	N/A	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Describe the direct costs of this proposed change here. None expected.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. None expected.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Small businesses who contract with internet service providers may directly benefit from business opportunities due to increased mitigation of make ready and permitting delays.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. Small businesses unserved by broadband or not BEAD-eligible due to federal rules will indirectly benefit from the proposed changes through their inclusion in a VATI project area.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p> <p>(a) N/A</p>	<p>Direct & Indirect Benefits</p> <p>(b)N /A</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>N/A</p>	
<p>(4) Assistance</p>	<p>N/A</p>	
<p>(5) Information Sources</p>	<p>N/A</p>	

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.

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

Title of Guidance Document	Original Length	New Length	Net Change in Length
Virginia Telecommunication Imitative 2024 Program Guidelines and Criteria	39 pages	35 pages	- 4 pages