

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)	Virginia Broadband Availability Map Internet Service Provider Service Territory Data Submission Guidelines
Action title	Guidance Document
Date this document prepared	November 22, 2023, updated 11/30/2023
Regulatory Stage (including Issuance of Guidance Documents)	Updated 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 updated guidance document eliminates state requirements that existed in the absence of federal guidelines. Federal guidelines now exist for the submission of broadband coverage data by internet service providers (ISPs). As such, the duplicative language and requirements have been eliminated and ISPs will be required to submit to the state the same information submitted to the federal government. Additionally, some dates and deadlines within the guidance document have been updated.

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

<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. The proposed change would reduce the requirements of internet service providers (ISPs) by eliminating the state requirements and deferring to the federal requirements for the collection of service territory data. This change would reduce the staff time and costs of the ISPs by not having to prepare two separate submissions. The precise monetary benefit is indeterminant at this time. Estimating the hourly rate of ISP staff that would compile and prepare the submission at \$35, and a compilation time of 20 hours per submission, with 120 ISPs responsible for the submission, removing the requirement to prepare two separate and distinct positions will result in a net savings of \$84,000.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. None expected.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
<p>\$168,000</p>	<p>(a)</p>	<p>(b) (\$84,000)</p>
<p>(3) Net Monetized Benefit</p>	<p>Savings of \$84,000</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>The proposed change would streamline the data submission process for ISPs and reduce the burden of having to submit two separate compilations of data.</p>	
<p>(5) Information Sources</p>		

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Describe the direct costs of this proposed change here. ISPs would be required to submit two separate compilations of data, one to the state and one to the federal government. This duplicative effort would likely result in increased staff time and costs for the ISPs.</p>
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	<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. Under status quo, no new benefits.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. Under status quo, no new benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

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

An alternative approach would be to require more stringent requirements than the federal government for the submission of broadband coverage data.

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. This alternative would create an additional layer of requirements and likely increase the staff time and costs of ISPs.</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. This alternative would produce additional data/information from the ISPs.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>
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	This alternative would produce additional data/information from the ISPs.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	This alternative would produce additional data/information from the ISPs.	
(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)	Direct Costs: Describe the direct costs of this proposed change here. None expected. Indirect Costs: Describe the indirect costs of the proposed change. None expected. Direct Benefits: Describe the direct benefits of this proposed change here. None expected. Indirect Benefits: Describe the indirect benefits of the proposed change. None expected.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)

(3) Other Costs & Benefits (Non-Monetized)	
(4) Assistance	
(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)	Direct Costs: Describe the direct costs of this proposed change here. None expected. Indirect Costs: Describe the indirect costs of the proposed change. None expected. Direct Benefits: Describe the direct benefits of this proposed change here. None expected. Indirect Benefits: Describe the indirect benefits of the proposed change. None expected.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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

<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. None expected.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. None expected.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a)</p>	<p>(b)</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>		
<p>(4) Alternatives</p>		
<p>(5) Information Sources</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.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Net Change
	Statutory:				
	Discretionary:				
				Total Net Change of Statutory Requirements:	
				Total Net Change of Discretionary Requirements:	

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
N/A	Change in guidelines to accept the same submission that is required by the federal government	\$168,000	\$84,000	50%

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

Virginia Broadband Availability Map Internet Service Provider Service Territory Data Submission Guidelines	7 pages	5 pages	-2 pages (-29%)

*If the agency is modifying a guidance document that has regulatory requirements, it should report any change in requirements in the appropriate chart(s).