

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Department of Housing and Community Development (DHCD)
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	Guidance Document
<b>VAC Chapter title(s)</b>	Guidance Document 5890 – Indoor Plumbing Rehabilitation Program Manual
<b>Action title</b>	Removal of IPR Program Manual
<b>Date this document prepared</b>	April 2025
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Removal of 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 Indoor Plumbing Rehabilitation Flex (IPR) program provides forgivable loans to low- and moderate-income owner-occupants of substandard housing that lacks complete indoor plumbing or has general rehabilitation needs with one or more major systems failing (HVAC, electrical, roofing, etc.). The IPR program is authorized in the state budget and receives state and federal funds. Since there are no statutes or regulations related to the IPR Program, DHCD recommends removing the program manual from Town Hall. The IPR Program Manual will continue to be accessible on DHCD’s website.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	The IPR Program manual does not fit the definition of a “guidance document” because is not related to any regulations in the Virginia Administrative Code (VAC). The manual is not a guidance document and does not impose statutory or regulatory requirements on Virginias, rather the manual spells out the processes and procedures for participation in the IPR program. The removal of the program manual will minimize potential confusion.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Net Monetized Benefit	None	

(4) Other Costs & Benefits (Non-Monetized)	Keeping the program manual may cause unnecessary confusion. Keeping the IPR program manual on Town Hall implies that the program imposes statutory and regulatory requirements, which it does not.
(5) Information Sources	

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

**Agency Note:** An alternative approach would be to continue providing the program manual on Town Hall, but replace it with the current manual.

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	Although the program manual would be up-to-date, it still would not fit the definition of a “guidance document” because it is not related to any regulations in the Virginia Administrative Code (VAC). The manual is not a guidance document and does not impose statutory or regulatory requirements on Virginians, rather the manual spells out the processes and procedures for participation in the IPR program. Keeping the program manual on Town Hall may cause unnecessary confusion by implying that the program imposes statutory and regulatory requirements, which it does not.	
(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: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	The removal of program manuals that do not impose requirements from the Code of Virginia or the Virginia Administrative Code will minimize potential confusion to individual citizens, business, and/or agencies of the Commonwealth.	
(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: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None

(3) Other Costs & Benefits (Non-Monetized)	The removal of program manuals that do not impose requirements from the Code of Virginia or the Virginia Administrative Code will minimize potential confusion to individual citizens, business, and/or agencies of the Commonwealth.
(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)	Direct Costs: None Indirect Costs: None Direct Benefits: None Indirect Benefits: None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	The removal of program manuals that do not impose requirements from the Code of Virginia or the Virginia Administrative Code will minimize potential confusion to individual citizens, business, and/or agencies of the Commonwealth.	
(4) Alternatives		
(5) Information Sources		

**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	Total Net Change in Requirements
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
<b>Grand Total of Changes in Requirements:</b>					(M/A):
					(D/A):
					(M/R):
					(D/R):

**Key:**

*Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:*

**(M/A):** Mandatory requirements mandated by federal and/or state statute affecting the agency itself

**(D/A):** Discretionary requirements affecting agency itself

**(M/R):** Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

**(D/R):** Discretionary requirements affecting external parties, including other agencies

*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)*

<b>Title of Guidance Document</b>	<b>Original Word Count</b>	<b>New Word Count</b>	<b>Net Change in Word Count</b>
Indoor Plumbing Rehabilitation Program Manual	21,935	0	(21,935)

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