

Office of Regulatory Management
Economic Review Form

Agency name	Department of Labor and Industry
Virginia Administrative Code (VAC) Chapter citation(s)	VOSH Guidance Documents on Town Hall
VAC Chapter title(s)	Guidance Documents to be moved to DOLI website
Action title	Removal of Guidance Documents
Date this document prepared	October 22, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Removal of Guidance Documents

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)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. No monetized direct/indirect cost/benefits. See box 4 below for non-monetized costs/benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	The benefit is greater clarity since these documents do not meet the statutory definition of a guidance document and not required to be posted on Regulatory Town Hall. There are no costs associated with removal of these documents from Regulatory Town Hall.	
(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: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. There are no monetized direct/indirect costs/benefits associated with maintaining the status quo: the documents would simply remain in place.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	

(4) Other Costs & Benefits (Non-Monetized)	There are no non-monetized direct/indirect costs/benefits associated with maintaining the status quo: the documents would simply remain in place.
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.</p> <p>There is no alternative to consider: either the documents will be removed (i.e., the change described in Table 1a) or left in place (i.e., the approach described in Table 1b).</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)		
(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)	Local partners will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(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. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. Families will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change. Small businesses will experience the same benefits/costs described in Table 1a.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)		
(4) Alternatives		
(5) Information Sources		

Changes to Number of Regulatory Requirements

No regulatory requirements associated with these documents.

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 (pages)	Additions	Subtractions	Total Net Change in Requirements (pages)
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):	1060		1060	(1060)
				Grand Total of Changes in Requirements:	(M/A):
					(D/A):
					(M/R):
					(D/R): (1060)

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)

Title of Guidance Document	Original PAGE Count	New PAGE Count	Net Change in PAGE Count
01 Series			
Program Directive Development, Classification and Numbering Systems for VOSH	6	0	(6)
Responsibilities of the Central/Regional Office Directors/Managers	8	0	(8)
Statewide Settlement Agreements	16	0	(16)
Citation Policy for Paperwork and Written Program Requirement Violations	9	0	(9)
Local Emphasis Programs: Development & Approval of Special Targeting Activities	5	0	(5)
State Plan Policies/Procedures Manual (Through CH-5)	2	0	(2)
Expedited Informal Settlement Agreement (EISA) Program	8	0	(8)
OSHA Support of NIOSH "FACE" Program	3	0	(3)
04 series			
VOSH Whistleblower Investigation Manual	55	0	(55)
05 series			
A Professional Development training Program for VOSH Compliance/Consultation Personnel	7	0	(7)
07 series			
Public Participation Guidelines for the Safety & Health Codes Board	12	0	(12)

Amendment to Bylaws for the Safety & Health Codes Board	9	0	(9)
08 series			
Exposure Control Plan for VOSH Personnel with Occupational Exposure to Bloodborne Pathogens	23	0	(23)
CSHO/Inspector Medical Exam Program	55	0	(55)
09 series			
State Program Requirements for Statistical Information on the Incidence of Occ. Injuries/Illnesses by Industry on the Injured/Ill Worker; and on the Circumstances of the Injuries/Illnesses	2	0	(2)
Respiratory Protection Manual	34	0	(34)
Partnership Programs	12	0	(12)
VOSH VPP Challenge Policies/Procedures Manual	195	0	(195)
OSHA Technical Manual (OTM)	25	0	(25)
Virginia BEST Policies/Procedures Manual	88	0	(88)
Virginia BUILT Policies/Procedures Manual	117	0	(117)
VOSH – VADOC Challenge Policies/Procedures	198	0	(198)
Recordkeeping Policies and Procedures Manual (RKM)	57	0	(57)
OSHA Occ. Chemical Database (formerly Chemical Information Manual)	2	0	(2)

Information Dissemination System for Ergonomic Inspections and Consultive Visits Resulting in Significant Benefits	2	0	(2)
Permanent Variance From 19010.178(n)(7)(iii); Virginia Precast Corp	5	0	(5)
Guidance for Employers to Mitigate the Risk of COVID-19 to Workers	3	0	(3)
VOSH Closing Conference Guide	8	0	(8)
Employer Responsibilities/Course of Action Following a VOSH Inspection	15	0	(15)
Job Safety and Health Protection Poster	1	0	(1)
Job Safety and Health Protection Poster - Spanish	1	0	(1)
Virginia Voluntary Protection Program (VPP) Policy/procedures Manual	73	0	(73)
Virginia Voluntary Protection Program (VPP) Policy/Procedures Manual	4	0	(4)
TOTAL PAGES	1060	0	(1060)

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