

Office of Regulatory Management
Economic Review Form

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| Agency name | Virginia Department of State Police |
| Virginia Administrative Code (VAC) Chapter citation(s) | 19 VAC 30-165 |
| VAC Chapter title(s) | Regulations relating to standards and specifications for purple warning lights used by vehicles leading or escorting funeral processions |
| Action title | 2024 Amendments to Regulations relating to standards and specifications for purple warning lights used by vehicles leading or escorting funeral processions – FINAL-EXEMPT |
| Date this document prepared | 21 MAY 2024 |
| Regulatory Stage (including Issuance of Guidance Documents) | FINAL – APA EXEMPT pursuant to § 2.2-4002 (B) (6) |

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) | <p>Direct Costs: There are no direct monetized costs associated with the proposed amendments to the regulation.</p> <p>Indirect Costs: There are no indirect monetized costs associated with the proposed amendments to the regulation.</p> <p>Direct Benefits: There are no direct monetized benefits associated with the proposed amendments to the regulation.</p> <p>Indirect Benefits: There are no indirect monetized benefits associated with the proposed amendments to the regulation.</p> | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) 0 | (b) 0 |
| (3) Net Monetized Benefit | NONE | |
| (4) Other Costs & Benefits (Non-Monetized) | The proposed changes to the regulation will make it easier for the regulated businesses, funeral homes, to comply with the statutory and regulatory requirements by simplifying their responsibilities under the regulation. | |
| (5) Information Sources | N/A | |

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

| | | |
|--|--|--|
| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Direct Costs: There are no direct monetized costs associated with the maintaining the regulation as is.</p> <p>Indirect Costs: There are no indirect monetized costs associated with the proposed amendments to the regulation.</p> <p>Direct Benefits: There are no direct monetized benefits associated with the maintaining the regulation as is.</p> <p>Indirect Benefits: There are no direct monetized benefits associated with the maintaining the regulation as is.</p> | |
|--|--|--|

| | | |
|--|--|----------------------------|
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) 0 | (b) 0 |
| (3) Net Monetized Benefit | None | |
| (4) Other Costs & Benefits (Non-Monetized) | The regulation as currently drafted is difficult to understand, comply with or enforce. It places the burden for complying with a manufacturing industry standard on the end user rather than the manufacturer. There is no benefit in retaining the regulation as is. | |
| (5) Information Sources | | |

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

| | | |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | Direct Costs: The alternatives considered were maintaining or amending/simplification of the regulation. Repealing the regulation is not an option as its adoption is mandated by statute. As no other alternatives were available there are no direct or indirect cost or benefits under an alternative approach. | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) 0 | (b) 0 |
| (3) Net Monetized Benefit | None | |
| (4) Other Costs & Benefits (Non-Monetized) | None | |
| (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 & | Direct Costs: There is no direct monetized costs or impact on local partners that will result from amending this regulation. |
|-------------------------------|--|

| | | |
|--|---|----------------------------|
| Benefits (Monetized) | <p>Indirect Costs: There is no indirect monetized costs or impact on local partners that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> <p>Direct Benefits: There are no indirect monetized benefits for local partners that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> <p>Indirect Benefits: There are no indirect monetized benefits for local partners that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) 0 | (b) 0 |
| (3) Other Costs & Benefits (Non-Monetized) | None | |
| (4) Assistance | N/A | |
| (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) | <p>Direct Costs: There is no direct monetized costs or impact on families that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> <p>Indirect Costs: There is no indirect monetized costs or impact on families that will result from amending this regulation. These regulatory</p> | |
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| | | |
|--|---|----------------------------|
| | <p>amendments impact funeral directors and those who manufacture or market purple lights.</p> <p>Direct Benefits: There are no direct monetized benefits on families that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> <p>Indirect Benefits: There are no indirect monetized benefits on families that will result from amending this regulation. These regulatory amendments impact funeral directors and those who manufacture or market purple lights.</p> | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) 0 | (b) 0 |
| (3) Other Costs & Benefits (Non-Monetized) | None | |
| (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) | <p>Direct Costs: There is no direct monetized costs or impact on small businesses that will result from amending this regulation.</p> <p>Indirect Costs: There is no indirect monetized costs or impact on small businesses that will result from amending this regulation.</p> <p>Direct Benefits: There is no direct monetized benefits for small businesses that will result from amending this regulation.</p> <p>Indirect Benefits: There is no indirect monetized benefits for small businesses that will result from amending this regulation.</p> | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |

| | (a) 0 | (b) 0 |
|--|--|-------|
| (3) Other Costs & Benefits (Non-Monetized) | <p>The regulation as currently drafted is difficult to understand, comply with or enforce. It places the burden for complying with a manufacturing industry standard on the end user rather than the manufacturer. These changes will shift the burden of compliance to those who manufacture or deal in the product being regulated. Small businesses, especially funeral homes, will benefit by being able to rely on the labeling of the light, the warranty, or certification of the manufacturer that the lights they are buying to comply with Virginia law are, in fact, compliant with that law.</p> | |
| (4) Alternatives | <p>No alternatives other than amending or retaining the status quo were considered. Retaining the regulation as is would keep the burden of ensuring compliance with the law on the funeral directors.</p> | |
| (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 |
|---------------------------------|---------------------|---------------|-----------|--|--|
| 19VAC30-165-10 (Unchanged) | (M/A): | 0 | 0 | 0 | 0 |
| | (D/A): | 0 | 0 | 0 | 0 |
| | (M/R): | 0 | 0 | 0 | 0 |
| | (D/R): | 0 | 0 | 0 | 0 |
| | | | | Grand Total of Changes in Requirements: | (M/A):0 (D/A):0 (M/R):0 (D/R):0 |
| 19VAC30-165-15 (New) | (M/A): | 0 | 0 | 0 | 0 |
| | (D/A): | 0 | 0 | 0 | 0 |
| | (M/R): | 0 | 1 | 0 | +1 |
| | (D/R): | 0 | 0 | 0 | 0 |
| | | | | Grand Total of Changes in Requirements: | (M/A):0 (D/A):0 (M/R): +1 (D/R):0 |
| 19VAC30-165-20-50 (Repealed) | (M/A): | 2 | 0 | 2 | -2 |
| | (D/A): | 0 | 0 | 0 | 0 |
| | (M/R): | 10 | 0 | 10 | -10 |
| | (D/R): | 0 | 0 | 0 | 0 |
| | | | | Grand Total of Changes in Requirements: | (M/A): -2 (D/A):0 (M/R):-10 (D/R):0 |

| VAC Section(s) Involved* | Authority of Change | Initial Count | Additions | Subtractions | Total Net Change in Requirements |
|--|---------------------|---------------|-----------|--------------|--|
| 19VAC30-165 (Overall) | (M/A): | 2 | 0 | 2 | -2 |
| | (D/A): | 0 | 0 | 0 | 0 |
| | (M/R): | 0 | 1 | 10 | -9 |
| | (D/R): | 0 | 0 | 0 | 0 |
| Grand Total of Changes in Requirements: | | | | | (M/A): -2 (D/A): 0 (M/R): -9 (D/R): 0 |

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 |
|--------------------------|---------------------------------------|--------------|----------|--------------------------------|
| None | | | | |
| | | | | |

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 |
|--------------------------|----------------------------------|---|
| 19VAC30-165 (20-50) | Repealed | Repealing the specific scientific measurements and approval process placed on funeral directors to ensure their lights were in compliance. |
| 19VAD30-165-15 | Added | Shifted compliance with industry standards to the manufacturer or seller of the lights who are better positioned to meet the requirements of the industry they are part of. |

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

| Title of Guidance Document | Original Word Count | New Word Count | Net Change in Word Count |
|-----------------------------------|----------------------------|-----------------------|---------------------------------|
| None | | | |
| | | | |

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