

**18 VAC 50-30 – BOARD FOR CONTRACTORS INDIVIDUAL LICENSE AND
CERTIFICATION REGULATIONS**

BOARD FOR CONTRACTORS

DEPARTMENT OF PROFESSIONAL AND OCCUPATIONAL REGULATION

**PROPOSED REGULATIONS FOR THE AMENDMENTS IMPROVE APPLICATION
INTEGRITY**

**Agency Response to Economic Impact Analysis (EIA) Performed by the Virginia
Department of Planning and Budget (DPB):**

Do not agree that the requirement to have an applicant provide a passport approved photograph would be overly burdensome or costly. DPB indicates that the cost would be no greater than \$13 or about 6% of the total cost of the application and examination (\$130 & \$85). The purpose of the passport photo is twofold, one to have an original photograph, not a scanned copy of a government ID, for the purposes of ensuring exam site security; and secondly, to be incorporated into photographic licenses, which the Board has indicated that it wishes to pursue. Scanned copies of government IDs would not be acceptable for use to make photo licenses. While the statement that it may be months before the licenses are in place is certainly reasonable given the procurement process, the parenthetical that it may be years before they are implemented is not likely. Once the photo license program is initiated it will be much more economical to have a number of the photos already on file, where the Board does not have to go through the time and expense to collect them.

With the exception of the statement that the requirement of passport photos may not be the most efficient way to achieve the benefits sought by the Board, the Agency concurs with the remainder of the analysis.