

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Motor Vehicles
Virginia Administrative Code (VAC) Chapter citation(s)	
VAC Chapter title(s)	DMV Policy for Adaptive Equipment and Certified Driving Rehabilitation Specialist (CDRS) Referrals
Action title	Amend guidance document section regarding minor vehicle modifications that assist individuals in fitting into their vehicle to clarify length of the pedal extender under this section.
Date this document prepared	5/10/23
Regulatory Stage (including Issuance 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)	<p>Direct Costs: Describe the direct costs of this proposed change here. The proposed amendment to the guidance document does not introduce any changes that would present any direct costs.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. The proposed amendment to the guidance document does not introduce any changes that would present any indirect costs.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. The proposed amendment to the guidance document does not introduce any changes that would present any direct benefits.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. The proposed amendment to the guidance document does not introduce any changes that would present any indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	\$0.00	
(5) Information Sources	While DMV acknowledges that added clarification regarding the pedal length could potentially lead a customer to be required to receive a DMV road skills examination, customers should already have road tests with the use of any pedal size. In the unlikely occurrence that such a test is necessary, the costs are too speculative and de minimis to calculate.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. Maintenance of the status quo would not present any direct costs.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. Maintenance of the status quo would not present any indirect costs.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. Maintenance of the status quo would not present any direct benefits.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
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	Maintenance of the status quo would not present any indirect benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	\$0.00	
(5) Information Sources	While the maintenance of the status quo is an alternative, the additional clarification from the proposed change offers additional clarity regarding potential exemptions.	

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. As the sole alternative is the status quo, the alternative approach would not present any direct costs.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. As the sole alternative is the status quo, the alternative approach would not present any indirect costs.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. As the sole alternative is the status quo, the alternative approach would not present any direct benefits.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. As the sole alternative is the status quo, the alternative approach would not present any indirect benefits</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	\$0.00	
(5) Information Sources	None. The sole alternative is maintenance of the status quo.	

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. 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.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	\$0.00	
(4) Assistance	As the proposed policy does not present any direct or indirect costs or benefits, no assistance is required.	
(5) Information Sources	As discussed above, while DMV acknowledges that added clarification regarding the pedal length could potentially lead a customer to be required to receive a DMV road skills examination, customers should already have road tests with the use of any pedal size. In the unlikely occurrence that such a test is necessary, the costs are too speculative and de minimis to calculate.	

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.	
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	<p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	\$0.00	
(4) Information Sources	<p>As discussed above, while DMV acknowledges that added clarification regarding the pedal length could potentially lead a customer to be required to receive a DMV road skills examination, customers should already have road tests with the use of any pedal size. In the unlikely occurrence that such a test is necessary, the costs are too speculative and de minimis to calculate.</p>	

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: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	\$0.00	

(4) Alternatives	As noted above, the sole alternative is maintenance of the status quo.
(5) Information Sources	As discussed above, while DMV acknowledges that added clarification regarding the pedal length could potentially lead a customer to be required to receive a DMV road skills examination, customers should already have road tests with the use of any pedal size. In the unlikely occurrence that such a test is necessary, the costs are too speculative and de minimis to calculate.

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	Initial Count	Additions	Subtractions	Net Change
DMV Policy for Adaptive Equipment and Certified Driving Rehabilitation Specialist (CDRS) Referrals	6	0	0	0

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 Length	New Length	Net Change in Length
DMV Policy for Adaptive Equipment and Certified Driving Rehabilitation Specialist (CDRS) Referrals	1 page 266 words	1 page 270 words	Increase of four words.