

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Virginia Department of Health
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	12 VAC 5-440 <i>et seq.</i>
<b>VAC Chapter title(s)</b>	Regulations for Summer Camps
<b>Action title</b>	Amend the Regulations for Summer Camps
<b>Date this document prepared</b>	3/19/2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Proposed

**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 style="text-align: center;"><b><u>Cost estimation per topic or change</u></b></p> <p><u>Definitions and Administrative.</u></p> <p>The current Regulations for Summer Camps (herein referred to as “Regulations;” and rename “summer camp” as “resident camp”) do not have any definitions or administrative regulatory sections. The definitions and administrative regulatory sections are new sections within the proposed amendment. The proposed administrative regulatory sections include 12VAC5-440-100 Definitions., 12VAC5-440-120 Enforcement not limited., 12VAC5-440-130 Variances., and 12VAC5-440-140 Compliance with the Uniform Statewide Building Code and local requirements.</p>
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There are no monetizable direct costs associated with the proposed sections.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Plan Review and Permits.

The current Regulations do not have any sections related to the requirement to submit plans to construct or renovate a resident camp or the review of such plans, nor do the current Regulations provide sections related to a permit to operate a resident camp. Section 35.1-16 (Regulations governing summer camps) of the Code of Virginia outlines that “the regulations of the Board governing resident camps shall include, but not be limited to: ... (viii) a procedure for obtaining a license.” The plan review and permit sections are new sections within the proposed amendment added to meet the Code requirement and to outline the plan review and permitting processes for camp owners. The proposed regulatory sections include 12VAC5-440-150 Plan review, and 12VAC5-440-160 Permit to operate.

The monetizable direct costs to have plans prepared as required by the plan review section is indeterminable as the type of design, level of design, or other influences are unknown. It is not anticipated that the proposed sections will incur additional cost as these requirements are already part of the agency and industry process for obtaining a resident camp plan review and permit as required by the 2023 Budget Bill (HB6001) and prior budgets. The process and plan specifications for constructing or remodeling a resident camp are also required through other permit processes such as building and zoning permits, sewage construction permits, water supply requirements, and other applicable processes that require permits or approval. Costs also may include the cost of printing plans or specifications for the submittal of a plan review to the local health department (if plans or specifications are not submitted electronically), and/or the cost of printing a permit to post in the office or on the premises of a camp. The average cost to print a 24x36” piece of paper (estimated average size for plan review printed submittal) is \$4.20. The average cost to print an 8.5x11” piece of paper (to post a permit on premises) is \$0.20. The one-time cost to submit plans may total \$4.20. The annual cost to post a permit on camp premises may total \$0.20 for a **total cost of \$4.40**.

There are no monetizable direct benefits or indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Rental Groups.

The current Regulations do not address rental groups, or groups operating as a resident camp at facilities that are not owned or primarily and consistently operated by the rental group. The proposed regulatory section, 12VAC5-440-170 Rental groups, is a new section that requires a rental group to either ensure that the rented facility holds a valid and current resident camp permit or obtain a resident camp permit as a lessee.

There are no direct costs associated with the proposed section.

There are no monetizable direct benefits associated with this change.

Monetizable indirect costs associated with this change are undeterminable. Rental groups may encounter no change, additional requirements that impose cost, or the need to relocate if the rental facility does not or cannot meet the regulatory requirements. A potential cost cannot be estimated as the occurrence or extent of non-compliance is unknown. A rental group may elect to relocate to another rental facility to reduce cost or require the rental facility to update the facility to meet regulatory requirements.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Inspection and Enforcement.

The current Regulations do not address inspection requirements, frequencies, and types, or enforcement provisions in the event of non-compliance or response to a public health threat. The inspection and enforcement sections are new sections within the proposed amendment. The proposed regulatory sections include 12VAC5-440-180 Inspection, 12VAC5-440-190 Performance-based and risk-based inspections, and 12VAC5-440-200 Enforcement, notices, informal conferences.

The direct monetizable costs associated with the proposed Inspection section (12VAC5-440-180) may impact the agency with the requirement to conduct a pre-opening inspection (prior to annual permitting) in addition to an inspection conducted at least once per permit period during normal operating hours. This new requirement may result in one additional inspection at an estimated cost to the agency of \$74.31 per inspection (staff cost estimator & LHD survey\*). There were 118 permitted overnight summer camps in Virginia in 2023. **This additional inspection requirement may directly cost the agency up to \$8,768.58 per year.** However, this amount conservatively assumes all facilities

will require a pre-opening and a routine inspection. This will not be the case as many if not most facilities will not require a pre-opening inspection. \*Estimated average EHS salary at \$51,156/year (fringe benefits not included in estimated salary).

There are no additional monetizable costs anticipated with 12VAC5-440-190 Performance-based and risk-based inspections., and 12VAC5-440-200 Enforcement, notices, informal conferences, as the content proposed is in line with current regulatory practices throughout the agency's regulatory programs.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of being held to consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Employee requirements.

The current Regulations do not address employee requirements related to criminal history or background checks for staff.

The potential direct monetizable costs associated with the proposed section 12VAC5-440-210 Employee requirements, may include:

1. The cost for obtaining a Criminal History Records Check or National Criminal Background Check.
  - a. Year-round staff shall have a background check performed at least every three years; and
  - b. New or returning seasonal staff shall have a background check performed every year.
2. The cost for legal counsel or human resources professional review and signature on the camp's hiring policy.
3. The cost to review and compare resident camp staff applications to the national sex offender public registry of the U.S. Department of Justice and other relevant public records.

Criminal History Records Check or National Criminal Background Check: According to the Virginia State Police, a Virginia Criminal History Record Check has a fee of \$15.00 per search. A combination Criminal History / Sex Offender Registry has a fee of \$20.00 per search. A Sex Offender search has a fee of \$15.00 per search. If a resident camp is a Non-Profit Organization, the

fees are reduced (Combination Criminal History/Sex Offender Registry-\$16.00; Complete Sex Offender-\$8.00). Obtaining fingerprints may incur a cost up to approximately \$20 at a local sheriff's office. According to the Federal Bureau of Investigations (FBI), a National criminal history that lists information derived "from fingerprint submissions kept by the FBI and related to arrests" will incur a cost of \$18 per person.

**Assuming the highest cost imposed on this requirement using Virginia resources (Virginia State Police), a resident camp may incur a cost of \$40.00 per staff member.** This estimate is based upon the cost for a combination Criminal History / Sex Offender Registry with a fee of \$20.00 per search and a potential cost of up to \$20 to acquire fingerprints. The total cost to a resident camp cannot be estimated as each camp will employ a different number of staff members. In addition, it is unknown how many staff will be year-round (requiring a background check performed at least every three years) or new or returning seasonal staff (requiring a background check performed every year).

Legal or HR council/review: It is anticipated that resident camp owners will have either existing legal counsel or a human resources staff member to review, sign, and date the resident camp staff hiring provisions and policy, therefore reducing or eliminating the overhead costs of obtaining new representation. It is estimated that approximately three to five hours will be required to review and sign the hiring policy at least once every three years. The anticipated rate to review and sign the hiring policy may include a legal fee up to \$265 per hour for a maximum of five hours (if on-staff human resources personnel are not available to review under normal staffing), **for an estimated maximum cost of \$1,325 every three years.** This cost can be estimated at approximately \$441.67 per year.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Comparison of applicants to National Sex Offender list: The Dru Sjodin National Sex Offender Public Website is free to use, and camps will incur no additional cost for the requirement to compare resident camp staff applications to the national sex offender list.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Supervision.

The current Regulations do not address supervisory requirements for how many camp staff members must directly supervise campers. The proposed section 12VAC5-440-220. Supervision, may lead to an increase in camp staff. Resident camp operators will need to ensure that the minimum staff to camper ratio is met as outlined in Table 1. The Table requires a range of staffing provisions, including one staff member to every five campers (5 years and younger) to one staff member to every 10 campers (15-18 years of age). The potential total number of additional camp staff cannot be estimated as each camp operates differently and has different totals of campers at various ages within camp at any given time.

A survey presented to the camp workgroup indicates that camps host a range of 8 to 450 campers per session or group. The survey also revealed that camps currently provide a staff to camper ratio ranging from one staff member to every 4 to 10 campers, depending on age, and an average staff to camper ratio of one camp staff member to 6 campers. Using this average and a potential increase of up to 1 additional camp staff member per group, it is possible **a resident camp may incur an additional direct cost up to \$16/hour or up to \$635/week for each additional staff member.**

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Resident camp register.

The current Regulations do not require a camp register or method of recording camper information. The proposed section 12VAC5-440-230 Resident camp register, includes a requirement to maintain a camp register that records camper information, including camper name, address, guardian and emergency contact information, and dates of attendance. Resident camp operators will need to ensure that a register is maintained. The register can be written or electronic.

There are no monetizable direct costs associated with this change. This process is typical to normal resident camp operations.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Health care and safety.

The current Regulations do not require any health care or safety provisions for campers and camp staff. The proposed section 12VAC5-440-240 Health care and safety, includes requirements for a camp health supervisor to supervise routine and emergency health care at a resident camp through consultation with a physician, make written arrangements for medical care of campers, and maintain records regarding camper and minor camp staff medical history and care. The section also requires a health care provider or emergency room be available for medical emergencies through appropriate transportation, and that parental or guardian signed permission be obtained for routine health care treatment, including the administration of medication. The section outlines the requirements for administration of prescription and nonprescription medication, the storage and handling of medication, and notification of medication reaction or error. The section requires the provision and location of first aid supplies and equipment and requires at least one person on site have First Aid CPR certification appropriate to the age of the children. The section also requires that all incidents requiring medical treatment or accidents resulting in death, injury, or illness be reported to the local health department within 24 hours.

The agency does not anticipate substantial direct monetary costs related to the proposed requirements specific to camp health supervision and record keeping. A survey presented to the camp workgroup indicates that most camps already employ or have a camp health supervisor or health team. The survey also indicates that most camps already work with a physician for medical services or emergency health plans. The creation and maintenance of camper and staff medical records is also likely to be part of normal resident camp operations and any alterations or modifications to record keeping will be minimal in burden and cost. The requirement to have either a physician or emergency room available for medical emergencies is typical of any business and is usually available through a variety of means, such as city or county emergency response services, or an on call or on-site medical provider. Such provisions will be at the discretion of the camp owner but will ensure a process and service for emergency response. It is anticipated that most resident camps already require and obtain parent or guardian signatures for the permission of the camp staff to administer medication. The process and maintenance of the signature records is expected to be minimal in cost and will vary depending on the size and services of the camp.

The agency anticipates that most resident camps already handle and store medication according to prescription or manufacturer instructions. The section

requires that medication requiring refrigeration shall be kept in a locked or secure location that prevents access by children. If not already provided, a secured refrigeration unit or locked storage box may be necessary to meet the provision.

The proposed section requires first aid supplies and equipment be located within the resident camp in an area designated by the camp health supervisor or as otherwise prescribed by the chapter. **The average cost of a first aid kit is approximately \$22.75.** The number of kits, specific type of kit, and contents of a kit will be specific to the camp operations and attendance and at the discretion of the camp health supervisor unless otherwise prescribed. The proposed section 12VAC5-440-370 outlines additional swimming facility first aid and equipment provisions and the cost associated with those requirements is addressed in that section.

The section requires that within one year of the effective date of the chapter that at least one person holding a current First Aid CPR certificate appropriate to the age of children be on-site 24 hours a day while camp is in session. **The estimated maximum cost of online and in-person First Aid CPR training is approximately \$117.00** (includes adult and pediatric first aid, CPR, and AED for maximum estimated need).

The section requires that the camp health supervisor shall notify the parent or guardian of a camper in the event of a medication error or reaction. Such notification could be in the form of a phone call, text message, or email without incurring any additional cost beyond that of normal operating conditions. The section also requires that all incidents that require medical treatment or accidents resulting in death, injury, or illness, with some exceptions, be reported to the local health department within 24 hours. This reporting could be in the form of phone call, text message, email, or fax and would not incur additional cost beyond that of normal operating conditions.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Communicable disease reporting.

The current regulations require the reporting of contagious diseases and outbreaks of disease (12VAC5-440-80). The proposed section 12VAC5-440-250 Communicable disease reporting, clarifies the term “immediately” and provides reference to the Regulations for Disease Reporting and Control (12VAC5-90) for specific disease reporting relevant to resident camps. The

section requires that occurrences or suspected occurrences of communicable disease be reported to the local health department within 24 hours. This reporting could be in the form of phone call, text message, email, or fax and would not incur additional cost beyond that of normal operating conditions. The section further requires staff to report illness to the camp health supervisor and that the camp provide isolation in the event of persons suspected of having a communicable disease until otherwise transported off camp premises.

There are no monetizable direct costs associated with this change.

There are no monetizable direct benefits associated with this change.

Monetizable indirect costs associated with this change may include the camp owner or camp health supervisor reviewing and reconfiguring a camp to accommodate isolation, as needed and applicable. Due to the variability of this potential need, an indirect cost cannot be estimated.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Emergency response plan and provisions.

The current Regulations do not require an emergency response plan or provisions for camp operations or incidents at camp. The proposed section 12VAC5-440-260 Emergency response plan and provisions, includes requirements for a resident camp to have an accessible telephone capable of connecting with 911 and an emergency transportation policy. The agency anticipates that most resident camps already have a phone system or process in place for notifying emergency services, requesting emergency transportation, or a vehicle or method for providing transportation to a hospital or clinic when needed, and therefore no additional cost would be incurred from this requirement. The section further requires that a resident camp have a written plan for actions to be taken in response to a variety of potential emergencies or incidents including evacuation, transportation, and relocation; lost or missing persons; weather; fire; power outages; water supply outages or when water supply fails to meet testing requirements; hazardous materials exposure; encounters with wildlife; intrusion or unauthorized access; injury; and communicable disease and foodborne illness outbreak. The development of plans relevant to the resident camp location, operations, and other variables may take time and would result in potential billable time specific to the camp owner or operator.

The monetizable direct costs associated with this change cannot be estimated due an unknown variability of the amount of time and billable cost to each resident camp owner or operator.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Resident camp location.

The current regulations prescribe camp location requirements (12VAC5-440-10). The proposed section 12VAC5-440-270 Resident camp location, clarifies the requirement for resident camps to be located on well drained sites not subject to flooding or ponding. It is expected that local zoning restrictions would prohibit the location of camps within mapped floodplains unless otherwise allowed by local zoning laws. The proposed section further restricts resident camps from being within 200 feet of natural and man-made hazards or in areas subject to contamination or the collection of drainage. While the content and language of the proposed section differs from the existing section, the provisions are similar in intent and therefore, there are no monetizable direct costs associated with this change.

There are no monetizable direct benefits associated with this change.

Potential monetizable indirect costs associated with this change could include an existing camp needing to alter the use or location of specific recreational or structural area to avoid existing site conditions that are prohibited. The cost of such an occurrence cannot be estimated due to unknown circumstances at each resident camp. Other potential indirect costs associated with the change could include the process of requesting a variance. For the resident camp owner or operator, this indirect cost could involve the time and effort required to research and submit a variance request. For the agency, the indirect costs could involve time and effort required to process a variance request.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Water supply.

The current regulations prescribe water supply requirements (12VAC5-440-20). The proposed section 12VAC5-440-280 Water supply, clarifies the requirements of an approved water supply to include the permitting or approval of the water supply, and expands water supply requirements specific to water testing requirements, water provision and access to campers and staff, water source protection, prohibitions, the use and cleaning of reusable containers,

water treatment during field outings, ice, access restrictions for unapproved wells and springs, and water connections to camping vehicles.

**Waterworks or private well:** The proposed requirement for a resident camp to use an approved water supply, either through a permitted waterworks or an approved private well is consistent with current program standards and requirements. There are no monetizable direct or indirect costs or benefits associated with this change.

**Lead testing:** The proposed requirement for a resident camp to test for lead prior to issuance of the initial permit and every five years thereafter will incur a direct cost to the camp owner. A water sample is required at all drinking water locations, including kitchen sink faucets, bathroom sink faucets, and drinking water fountains, as available. Where numerous drinking water faucets are provided, such as in bathrooms or in a bathhouse, a representative sample may be collected from one sink rather than each individual sink within the bathroom or bathhouse, thus reducing the cost burden for sampling. Resident camp drinking water locations will vary with each camp based upon size and structure. **The estimated cost per lead sample is approximately \$57.**

There are no monetizable direct benefits associated with this change.

The monetizable indirect costs associated with this change may include a lead treatment plan in the event water samples report detections of lead above the action level. The cost of a lead treatment plan is undeterminable due to the variable size and nature of resident camps throughout Virginia and the undetermined possibility that a water supply would test above the lead action level.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

**Total coliform and nitrate-nitrogen testing:** The proposed requirement for a resident camp to test for total coliforms and nitrate-nitrogen prior to permit issuance and at least annually thereafter will incur an annual direct monetary cost. One sample per year per constituent will be required and will incur an estimated cost of approximately \$52 for one coliform sample and approximately \$56 for one nitrate-nitrogen sample, for an **estimated total of \$108 each year.**

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Sample result requirements:* The proposed requirement for a resident camp to maintain a water supply that meets the total coliform and nitrate-nitrogen standards is not expected to incur a monetizable direct cost.

There are no monetizable direct benefits associated with this change.

Potential monetizable indirect costs associated with this change may include treatment of the water supply, resampling, and other efforts to comply with the sample standards. The extent and cost of such occurrences and efforts cannot be estimated as the potential of occurrence and extent of remediation is unknown and cannot be predicted.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Use of laboratory certified by Department of General Services, Division of Consolidated Laboratory Services:* The proposed requirement for a resident camp to ensure all water samples be collected, preserved, shipped per laboratory instructions, and analyzed by a laboratory certified by the Division of Consolidated Laboratory Services is not expected to incur any monetizable direct costs.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Discontinuing use of unsatisfactory water supply:* The proposed requirement for a resident camp to discontinue use of the public or private water when the water from the system does not meet the requirements of this chapter is not expected to incur monetizable direct costs. Indirect costs could be incurred. See discussion of monetizable indirect costs.

There are no monetizable direct benefits associated with this change.

Monetizable indirect costs associated with this change may be incurred by a camp owner. The situation and outcome resulting from a water supply not meeting the requirements of the proposed chapter cannot be predicted but could include the potential for a temporary suspension of camp activities or services and the costs associated with loss of income from suspended camp services.

Other potential indirect costs may include the camp owner making provisions for an alternative water supply until the water supply meets the applicable standards and the costs associated with water supply remediation. The extent and cost of such occurrences and efforts cannot be estimated as the potential of occurrence and extent of services or remediation is unknown and cannot be predicted and would likely not outweigh the benefit of protecting children and camp staff from an unsafe water supply.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Water provisions and protections:* The proposed requirements for a resident camp to provide water at easily accessible locations, protect areas surrounding water supplies, and providing water to campers and staff via approved drinking water fountains, approved cups, or personal water containers is not expected to incur monetizable direct costs as it is expected that most resident camps already protect water supplies and provide water to campers and staff through a variety of means. The proposed requirements for a camp owner to ensure that approved water containers are cleaned and sanitized daily is not expected to incur monetizable direct costs as it is expected that most resident camps already employ cleaning and sanitizing of water containers.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Water treatment for field outings:* The proposed requirements for a resident camp to provide purified drinking water during field outings when approved drinking water cannot be transported may incur a monetizable direct cost for the filter and chemical disinfection used to purify water. A filter meeting the micron size per NSF 53 or 58 may incur an estimated average cost of \$127.45, while the chemical treatment product may incur an estimated average estimated cost of \$17.17 **for a total cost of \$144.62**. Ultraviolet (UV) treatment may be used as an alternate to chemical treatment. UV treatment devices may incur an estimated average cost of \$104.98 and may be used as a preference instead of chemical treatment.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Using water treatment devices according to manufacturer instructions:* The proposed requirements for a resident camp to maintain and use devices for water treatment according to manufacturer instructions and to maintain the devices in good condition is not expected to incur any monetizable direct costs other than regular maintenance in accordance with manufacturer instructions.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Ice from approved source:* The proposed requirements for a resident camp to provide ice from an approved source and handle it in a manner to prevent contamination, if ice is provided, is not expected to incur any monetizable direct costs other than regular use and handling.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Unapproved wells or springs/signage:* The proposed requirement for a resident camp to make unapproved wells or springs inaccessible for human consumption and to provide signage stating, in effect, “WARNING – DO NOT DRINK” and an infographic sign presented in a manner to be interpreted by small children may incur a monetizable direct cost for signage. A “Warning” sign may incur an estimated average cost of approximately \$46.08, while an infographic illustrating a warning to not drink the water may incur an estimated average cost of \$19.28 for a **total estimated cost of \$65.36.**

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

*Water connections for camping vehicles:* The proposed requirements for a resident camp to install water connections that will not be damaged by camping vehicles, in pits or above the ground surface, or horizontally separated from sewer connections, are not expected to incur monetary direct costs unless the water connections were not installed to the applicable code at the time of construction. If modification to the water connection is required, the potential cost is anticipated to be reflective of normal operation and maintenance costs for properly maintaining water connections at a camp. Any potential cost of such occurrences and efforts cannot be estimated as the potential of occurrence and extent of remediation is unknown and cannot be predicted.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Sewage disposal.

The current regulations prescribe excreta disposal requirements (12VAC5-440-50), otherwise referred to in the current regulation as “human wastes or excrements.” The proposed section, 12VAC5-440-290 Sewage disposal, clarifies the requirement that every resident camp be provided with an approved sewage disposal system in accordance with the Sewage Handling and Disposal Regulations (12VAC5-610). The proposed section also outlines requirements for individual sewer connections for camping vehicles, if provided. The proposed section requirements are not expected to incur monetary direct costs unless the individual sewer connections were not installed to the applicable code at the time of construction. If modification to the sewer connection is required, the potential cost is anticipated to be reflective of normal operation and maintenance costs for properly maintaining sewer connections at a camp. Any potential cost of such occurrences and efforts cannot be estimated as the potential of occurrence and extent of remediation cannot be predicted.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Storage, handling, and preparation of food.

The current regulations prescribe requirements for the storage, handling, and preparation of food (12VAC5-440-40). The proposed section 12VAC5-440-300

Storage, handling, and preparation of food, updates the requirements to conform with the Virginia Food Regulations (12VAC5-421) unless otherwise exempt pursuant to § 35.1-25 of the Code of Virginia. A survey presented to the camp workgroup indicates that all surveyed resident camps already offer full food services that require and hold a food permit from the local health department. Therefore, there are no monetizable direct costs associated with this change.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

#### Sanitary facilities.

The current regulations prescribe general requirements for toilet facilities under section 12VAC5-440-50. Excreta disposal. The section provides general requirements for the presence of adequate toilets that are conveniently located, maintained clean and in good repair, and provided with lighting and ventilation. The proposed section 12VAC5-440-310 Sanitary facilities, updates the requirement for toilet and bathing facilities to comply with applicable building code. Facilities shall be provided within 500 feet of all overnight lodging, unless otherwise specified by the applicable building code. The proposed section also requires that sanitary facilities be provided with artificial lighting with at least 10-foot candles at a distance of 30 inches from the floor. Further, the section requires sanitary facilities meet a prescribed ratio of toilets, handwashing, and shower facilities, be maintained clean and in good repair, and not be used for storage while camp is in operation. The section requires provisions for handwashing in facilities having flush toilets and at all bathing facilities. The section also allows the use of portable handwashing sinks when privies are used, or in the absence of portable handwashing sinks, hand sanitizer shall be provided and accessible in all privies.

The 500-foot distance and prescribed ratio requirements may incur a cost for compliance if existing camps do not already provide sufficient toilet facilities within 500 feet. Privies, including portable toilets, are allowed. In the event a resident camp must alter or add sanitary facility provisions, the use of portable toilets is an option that may incur the least amount of construction cost. While the use of portable toilets versus permanent facilities is at the discretion of the camp owner, the potential monetizable direct cost for the proposed section is estimated using the lowest cost option, portable toilets. The average cost to purchase portable toilet is: \$811.47 per toilet. The average cost to service a portable toilet is approximately \$416.66 per visit. Due to the variability of pumping requirements, it may be cost effective for a camp to rent portable

toilets that include a routine service for pumping, cleaning, and restocking supplies (toilet paper, hand sanitizer). The cost of a monthly rental will vary depending on location, number of toilets provided, and frequency of service. **An estimated average cost of a monthly rental for a portable toilet with service can range from \$100-500 with an average cost of \$300 per month.**

The requirement to provide artificial lighting to sanitary facilities, including privies, may incur a monetizable direct cost if lighting is not already provided. While the action of installing electrical connections to a sanitary facility is at the discretion of the camp operator and the applicable building code, adequate solar lighting is a low-cost alternative to meet the requirement. The potential monetizable direct cost for the proposed section is estimated using solar lighting. **The estimated average cost of a solar lighting unit is approximately \$33.32 per unit.**

If a camp owner elects to use privies and use portable handwashing sinks, the monetizable direct cost imposed by a portable handwashing sink would be voluntary as the provision of hand sanitizer is also an option. Considering the options available to the camp owner, the monetizable direct cost related to hand sanitation may range from \$26.38 to \$1,240.29. **The estimated average cost for hand sanitizer and a dispenser is approximately \$26.38.**

The estimated average cost to purchase a portable handwashing sink is approximately \$1,240.29. (Monetary value of portable hand washing sinks was gathered from online research (Poly John, MOBI, Monsam, Cambro, and Regency) and industry representative outreach (Crown Verity, Satellite). Much like portable toilet provisions, portable handwashing sinks, or a serviced supply of hand sanitizer may be rented at a weekly or monthly rate separate from or included with the portable toilet services, as applicable. Prices vary.

If a camp owner elects to install permanent sanitary facilities, the cost associated with that action cannot be estimated as the potential of occurrence and extent of construction is unknown and cannot be predicted.

#### Garbage and refuse disposal.

The current regulations address general sanitation (12VAC-440-60) including the storage and disposal for garbage and trash. The proposed section 12VAC5-440-320 Garbage and refuse disposal, updates and outlines provisions for the storage, collection, and disposal of solid waste typical of resident camp operations. There are no monetizable direct costs associated with this change.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Chemical use and storage.

The current Regulations do not require any chemical use and storage provisions for resident camp operations. The proposed section 12VAC5-440-330 Chemical use and storage, includes requirements for a resident camp to use chemicals for their intended uses according to manufacturer's instructions and to store chemicals in a separate and secure area accessible to appropriate staff in containers appropriate for use, easily identifiable, and labeled. There are no anticipated monetizable direct costs associated with this change.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Requirements for resident camp structures and sleeping quarters.

The current Regulations provide minimal requirements for camp structures and sleeping quarters. Section 12VAC-440-60. General sanitation, provides that "all rooms, huts, shacks, tents and other buildings and all furniture and equipment therein shall be kept tidy, clean and in a sanitary condition." The proposed section 12VAC-440-340 Requirements for resident camp structures and sleeping quarters, provides that all camp structures be in accordance with the applicable building and fire code, have adequate ventilation, and be kept clean and in good repair. The proposed section also provides that outer openings be effectively screened or protected to prevent insect and vermin entry. The section further provides sleeping occupancy limits where not otherwise specified by building code and outlines separation distances for sleeping quarters. Bedding requirements are listed within the proposed section, including keeping bedding clean and in good repair, providing mattress covers that are impervious to moisture, where applicable, and that guardrails are provided and attached to top bunks as specified by manufacturer instructions. The agency does not anticipate that the proposed requirements will incur any additional monetizable direct cost beyond the cost of regular operation and maintenance of camp structures and sleeping quarters.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Specialized program activities.

The current Regulations do not require health and safety requirements for specialized program activities. The proposed section 12VAC5-440-350 Specialized program activities, requires all specialized program activity equipment and related apparatus be maintained in good repair and installed and maintained as designed by the manufacturer specifications. The proposed section requires equipment and related apparatus be inspected prior to use by the permit holder or designee and that inspections are documented. Further, the proposed section requires that specialized program equipment be securely stored or restricted when not in use. Additionally, the proposed section requires that protective equipment, including helmets, and other safety provisions be made available and required for campers engaged in specialized activities. The agency does not anticipate that the proposed requirements will incur any additional monetizable direct cost beyond the cost of regular operation and maintenance of specialized program activity equipment.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Aquatic activities.

The current Regulations provide vague and outdated requirements for swimming facilities (12VAC5-440-70) including preventing pollution of swimming water by human excreta. Proposed section 12VAC-440-360. Aquatic activities, provides that all swimming, small watercraft, and boating activities shall be under the supervision of a person holding a current lifeguard certification. The proposed section also provides a lifeguard ratio of one lifeguard for every 25 campers and one attendant for every 10 campers engaged in aquatic activities. The section requires the permit holder to develop and maintain a lifeguard and staffing plan that identifies water recreation areas, hazards associated with the areas, operational hours, staffing locations, and first aid and emergency response information. The proposed section also requires that camper access to natural hazards be restricted where possible, that aquatic activity equipment be maintained in good repair, and that rules and restrictions be posted in a conspicuous location. Further, the proposed section requires signage at aquatic access points that identify potential hazards, provide illness

prevention education related to the hazard, and restricts swimming in stormwater ponds.

A survey presented to the camp workgroup indicates that all many resident camps already employ or require lifeguards for aquatic activities at a ratio similar to the proposed section requirement. If a resident camp does not already employ and require staff with lifeguard certification, the estimated cost for lifeguard certification is approximately \$289. Estimating upward of two camp staff requiring lifeguard certification, **the potential monetizable direct costs associated with this change is estimated at \$578.**

The development of plans relevant to resident camp aquatic staff may take time and would result in a potential billable time specific to the camp owner or operator. The monetizable direct costs associated with this change cannot be estimated due an unknown variability of the amount of time and billable cost to each resident camp owner or operator.

Signage for potential hazards, restrictions, and education may incur the cost of a sign or multiple signs depending on the site conditions and potential hazards. While the extent of signage due to the presence of hazards cannot be determined, a camp may incur a direct cost for providing approximately two signs related to natural hazards. The estimated average cost of a custom-made sign illustrating or otherwise notifying the public of hazards is approximately \$45.25. **Estimating a camp will need two signs provides a potential estimated monetizable direct cost of \$90.51.**

There are no monetizable direct benefits associated with this change.

If a resident camp did not already employ sufficient lifeguards to meet the requirement and chose to compensate or reimburse the two camp staff requiring certification, as estimated above, **monetizable indirect costs associated with this change are estimated at \$768** (This estimate includes the staff time for two staff at an estimated \$16/hour for three eight-hour days of class: \$16 per hour x 24 hours = \$384 x 2 staff = \$768).

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

#### Swimming facilities.

The current Regulations provide vague and outdated requirements for swimming facilities (12VAC5-440-70), including preventing pollution of swimming water by human excreta and changing pool water at intervals. Proposed section 12VAC-440-370. Swimming facilities, provides that all swimming pools comply with the applicable building code and the applicable Board of Health regulations for public swimming pools. The proposed section

also requires that, when not otherwise prescribed by State the Board of Health, safety equipment be maintained within 30 feet of the natural or man-made swimming area, including an equipped and maintained first-aid kit; a reaching pole or shepherd's crook; a ring buoy, rescue tube, or throw bag; and a backboard equipped with head immobilizer and sufficient straps. In addition, the proposed section restricts night swimming in natural swimming areas and in man-made swimming areas unless underwater lighting is provided in accordance with the applicable building code. The estimated monetizable direct costs associated with this proposed section includes the potential cost for a camp owner to provide required safety equipment.

The estimated average cost of a first aid kit is approximately \$22.75. The number of kits, specific type of kit, and contents of a kit will be specific to the camp and at the discretion of the camp health supervisor unless otherwise prescribed. The estimated average cost of a reaching pole or shepherd's crook is \$153.20. The estimated average cost of a ring buoy, rescue tube, or throw bag is \$48.92. The estimated average cost of a backboard equipped with head immobilizer and sufficient straps is approximately \$343.26. If a resident camp does not already provide the proposed required aquatic safety equipment, the resident camp may incur a monetizable direct cost. **The estimated total cost of safety equipment is approximately \$568.13.**

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

#### Boating or other watercraft activities.

The current Regulations do not provide requirements for boating or other watercraft activities. Proposed section 12VAC-440-380. Boating or other watercraft activities, provides that every boat be provided with at least one U.S. Coast Guard approved personal floatation device for each person on board or that each person wear one aboard, and that at least one boat involved in aquatic activities be provided with a rescue pole or a throw rescue device attached to a minimum of 25 feet of 1/4-inch rope.

The estimated average cost of a U.S. Coast Guard approved personal floatation device is \$31.73. The estimated average cost of a throw rescue device is \$48.92. If a resident camp provides boating or other watercraft activities and does not already provide the required aquatic safety equipment, the resident camp owner may incur a monetizable direct cost. **The estimated cost of boating or watercraft safety equipment is approximately \$80.65.**

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Animals.

The current Regulations do not require health and safety requirements related to animals housed or located on resident camp property. The proposed section 12VAC5-440-390 Animals, restricts stray domestic animals from running at large within the limits of any resident camp. In addition, the proposed section requires that all camp animals be licensed and vaccinated in compliance with state and local requirements and that licensure and vaccination documentation be maintained at the resident camp facility. Further, the proposed section requires all horse and livestock prescription medication be secured in an area away from camper access and locked when not in use, as well as requiring that livestock areas be maintained free from the excessive accumulation of manure. The agency does not anticipate that the proposed requirements will incur any additional monetizable direct cost beyond the cost of regular management and maintenance of animals at a resident camp.

There are no monetizable direct benefits associated with this change.

There are no monetizable indirect costs associated with this change.

Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.

Transportation.

The current Regulations do not require health and safety requirements related to transportation. The proposed section 12VAC5-440-400 Transportation, requires all vehicles used for resident camp activities or excursions be insured, kept clean and in good condition, and operated in a safe and legal manner. The proposed section also requires supervision of campers while in the vehicle, the presence of a first aid equipment, a communication device, and emergency information in all vehicles. The proposed section further requires that safety restraints be used properly in accordance with the law and manufacturer's instructions and that staff receive training in the use of safety restraints. The agency does not anticipate that the proposed requirements will incur any additional monetizable direct cost beyond the cost of regular operation and maintenance of vehicles at a resident camp.

	<p>There are no monetizable direct benefits associated with this change.</p> <p>There are no monetizable indirect costs associated with this change.</p> <p>Monetizable indirect benefits associated with this change may include the benefit of consistent and up-to-date health and safety standards and the impact of such standards on the operation and management of a resident camp.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
(3) Net Monetized Benefit	<p>(a) <b>\$13,732.70</b></p> <p>(b) 0</p>	
(4) Other Costs & Benefits (Non-Monetized)	<p><b><u>Other Non-Monetized Benefits per proposed change:</u></b></p> <p><u>Overall</u></p> <p>Providing comprehensive, consistent, and up-to-date standards will provide the industry and the public with improved and comprehensive health and safety protections at resident camps.</p> <p><u>Definitions and Administrative.</u></p> <p>Sections for definitions and administrative content will provide improved understanding and application of the regulations. Definitions for terms and acronyms will enhance reader understanding and provide consistency throughout the regulation. Administrative content provides the agency and industry an understanding of the authority of enforcement, and pathways to compliance and the process to request a variance.</p> <p><u>Plan Review and Permits.</u></p> <p>Sections for plan review and permitting will provide improved understanding and consistent application of the regulations. The plan review provisions ensure adequate sanitation, water, and camp design meeting the proposed provisions of the chapter and better protect the health and safety of campers and camp staff.</p> <p><u>Rental Groups.</u></p> <p>The requirement that rental groups meet the proposed chapter extends protections to other locations that operate as a resident camp, such as a college</p>	

or university campus. This requirement further ensures the protection of health and safety of campers and camp staff.

Inspection and Enforcement.

Sections specific to inspection and enforcement provide an improved understanding and application of the regulation; the requirement that camps be inspected by district or local health departments on a regular frequency; a pathway to better protect the health and safety of campers through a potential increase in inspections based upon an individual camp's operations; and clarity to the suspension and revocation process and allowances, as well as opportunities for appeal.

Employee requirements.

Requiring resident camp employees to meet criminal history requirements aims to protect child health, safety, and welfare from potential predators.

Supervision.

Prescribing minimal camper to staff ratios aims to protect child health, safety, and welfare by prescribing supervision requirements to better protect children while at camp.

Resident camp register.

Requiring a register that records camper information aims to protect child health, safety, and welfare related to recording campers present at camp and basic information on each camper.

Health care and safety.

This section provides a minimal standard that aims to protect child health, safety, and welfare as it relates to medical services for children while at camp.

Communicable disease reporting.

This section outlines provisions for communicable disease reporting to the district or local health department and improves the understanding and application of the regulation. The proposed requirements provide for improved protection of campers and camp staff in relation to communicable disease.

Emergency response plan and provisions.

Providing a minimal requirement for emergency planning and response at a camp increases protections for camper and staff health and safety.

Resident camp location.

The proposed section improves understanding and application of the regulation and provides for improved protection of campers and camp staff in relation to camp facility location.

Water supply.

The proposed section improves understanding and application of the regulation and provides for improved protection of campers and camp staff in relation to camp water supplies and distribution. Testing a water supply is the best way to ensure that a drinking water supply is safe from harmful chemicals and bacteria. Testing for bacteria provides protection against acute gastrointestinal illness, while testing for nitrates can prevent health problems such as methemoglobinemia, commonly known as “blue baby syndrome.” Testing for lead is a preventative measure to further protect the health of children. Children who drink water with unsafe lead levels can have delays in physical and mental development. Lead can affect any water supply through the plumbing system; the only way to know if lead is present is to test the water. The Environmental Protection Agency (EPA) developed a program to assist schools and childcare facilities in determining the presence of lead in water supplies as a means to reduce potential lead exposure to children. The proposed Regulation requires resident camps to sample water for lead per Modules 4 and 5 of the EPA manual: 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities. The manual provides reference for water sampling locations and methods specific to lead.

Sewage disposal.

The proposed section improves the understanding and application of the regulation and improves protection of campers and camp staff in relation to sewage handling and disposal.

Storage, handling, and preparation of food.

The proposed section improves protection of campers and camp staff in relation to camp food services and the potential for foodborne illness or outbreak.

Sanitary facilities

The proposed section improves understanding and application of the regulation and improves protection of and provisions for campers and camp staff in relation to sanitary facilities.

Garbage and refuse disposal.

The proposed section provides improved protection of and provisions for campers and camp staff in relation to solid waste handling, disposal, and management.

Chemical use and storage.

The proposed section provides a minimal requirement for chemical and hazardous material handling that increases protections for camper and staff health and safety.

Requirements for resident camp structures and sleeping quarters.

The proposed section provides minimal requirements for camp structures and sleeping quarters that increases protections for camper health and safety.

Specialized program activities.

The proposed section provides minimal requirements for specialized program activities and related equipment that increases protections for camper health and safety.

Aquatic activities.

The proposed section provides for improved protection of campers and camp staff in relation to aquatic activities, including swimming, boating, or other watercraft or water-based activities, through safety and supervision requirements.

Swimming facilities.

The proposed section provides for improved protection of campers and camp staff in relation to swimming pools and other natural water activities, including swimming, boating, or other water-based activities through safety equipment requirements and compliance with public pool regulations.

Animals.

The proposed section provides minimal requirements for animals at resident camps to be supervised and meet vaccination requirements to protect the health and safety of campers, staff, and animals.

Transportation.

The proposed section provides minimal requirements for transportation vehicles, equipment, and supervision that increases protections for camper health and safety.

(5)  
Information  
Sources

The VDH Office of Environmental Health Services and a stakeholder workgroup of over 40 industry representatives collectively drafted, edited, and recommended the proposed amendments to the Regulations for Summer Camps. VDH has received very positive feedback from the American Camp Association (ACA) regarding VDH's stakeholder engagement during this process and our economic impact review. ACA and others have stated that they do not typically see this level of engagement from other states when dealing in overnight summer camp regulatory revisions.

The stakeholder workgroup included the following:

Local Health District	Name	Comments
Pittsylvania-Danville	Wesley Marshall	
New River	Gary Coggins	Commenter
Lenowisco	Nathaniel Rasnake	Commenter
Allegheny	Lorie Spotswood	
Western Tidewater	Dianne Lehnerd	

Camp	Name	Comments
Camp Rock Enon	Bill Joyce	Commenter
W.E. Skelton 4-H Educational Center	Rayna Wheeler	Commenter
SWVA 4-H Center	Sandra Fisher	
Chanco on the James	Gareth Kalfas	Commenter
Blue Ridge Discovery Center	Lisa Benish	Commenter
Easter Seals UPC North Carolina & Virginia, Inc.	Whitney Civitts	
Camp Carysbrook	Colleen Hagan Egl	
NC Youth Camp Association	Sandi Boyer	
Northern Virginia Camps & Conference Co.	Adam Davis	
Watermarks Camp Inc.	Josh Critzer, Director	
Camp Alta Mons	Ronda Wimmer, Dennis Kennedy	
Camp Holiday Trails	LaRoche, Tina	Commenter
Camp Cheerio	Michaux Crocker, Jim Hussey	Commenter
Triple C Camp	Libby Rothenberg	Commenter
Wild and Free Farm Village	Arment, Ben	
Gospel light Christian Camp	Brian Vanderford	
4-H	Katie Tennant	
Camp Pocahontas	Thomas, Nathan	

Camp Mont Shenandoah	Ann Warner	Commenter
BSA, Blue Ridge	Bethany Brownfield	
Nature Camp	Phillip Coulling	Commenter
Camp Friendship	Ackenbom, Alina	Commenter
Covenant Mountain Mission	Cindy Laws	
Williamsburg Christian Retreat Center	Bob Briscoe	Commenter
RBA Camp Alkulana	Beth Wright	
Indian Cave Youth Camp	Rickie Garner, Ryan Robertson	
Camp Maxwelton - Camp Lachlan	McLaughlin, Jr., Lee & Nancy	Commenter
Pipsico Scout Reservation	John Scheib	Commenter

Organization	Name	Industry Type	Comments
American Camp Association	Vincent Irving	Accreditation	Supporter
IIAV	Joe Hudgins, Bob Bradshaw	Insurance	Commenter
Armstrong Unlimited	Maile Armstrong	Camp Consultant	Commenter

Agency	Name	Office	Comments
VDH	Marcia Degan	OEHS	Wastewater SME
VDH	Scott Vogel	OEHS	Private Wells SME
VDH	Lisa Wooten	OFHS	Injury and Prevention SME
	Sarah Wilson		Transportation
DCHD	Jeff Brown	Office of State Building Code	Building Code SME
VDH	Brad Porter, Brandy Darby, et al.	OEPI	Communicable Disease SME
VDH	Kyndra Jackson	OCOM	Health Care SME
VDH	Julia Murphy	OEPI	Animal vaccination SME
VDH	Margaret Smigo	OEHS	Natural Waters SME
VDH	Whitney Wright	OEHS	General Review
VDH	Kristin Clay	OEHS	Legal SME
VDH	Robert Edelman, JaneNunn	ODW	Public Water SME
VDH	Amy Hayes	OEHS	Lead / Toxicology SME

Some eastern states have recently revised summer camp regulations, however, revisions are minimal and appear to be part of a routine review process:

- Ohio updated their [code](#) in 2022 and do so every 5 years.
- Kentucky updated their [Youth Camp regulations](#) with no obvious changes.
- North Carolina is in the final processes of completing their Resident Camp Regulations and expect them to effective in May 2024. This is noteworthy as NC had previously repealed their campground regulations as "unnecessary," but the state seems to value keeping and updating their resident camp regulations.

2023 Budget Bill (HB6001):

(<https://budget.lis.virginia.gov/get/budget/4784/HB6001/>)

The average cost to print an 24x36" piece of paper is \$4.20:

(<https://www.staples.com/services/printing/engineering-blueprints/>).

The average cost to print an 8.5x11" piece of paper is \$0.20:

(<https://www.staples.com/services/printing/copies-documents-printing/simple-prints>).

Virginia State Police: (<https://vsp.virginia.gov/services/criminal-background/>), fees and processes (<https://vsp.virginia.gov/wp-content/uploads/2021/12/SP-167-Instructions.pdf>).

Estimated cost for fingerprints (various locations): (

<https://www.albemarle.org/government/police/services/fingerprinting>;

<https://www.townoffairfax.org/fingerprints/>;

<https://www.pwcva.gov/department/sheriffs-office/fingerprinting>;

[http://www.smythcounty.org/Sheriff/sheriff\\_%20administrative.htm](http://www.smythcounty.org/Sheriff/sheriff_%20administrative.htm);

<https://www.roanokecountyva.gov/89/Sheriffs-Office>).

Federal Bureau of Investigations (FBI) National criminal history or "rap sheet" information and cost: (<https://www.fbi.gov/how-we-can-help-you/more-fbi-services-and-information/identity-history-summary-checks>).

The Dru Sjodin National Sex Offender Public Website:

(<https://www.nsopw.gov/>).

Estimated legal fees to review and sign the hiring policy:

(<https://www.contractscounsel.com/b/average-cost-of-a-lawyer>).

Estimated resident camp staff pay rate:

(<https://www.ziprecruiter.com/Salaries/Overnight-Summer-Camp-Counselor-Salary-per-Week>)

The average cost of a first aid: (<https://www.ussafetykits.com/first-aid-kits/all-purpose-first-aid-kits/summer-camp-first-aid-kits/>).

Cost of online and in-person First Aid CPR training:

(<https://www.redcross.org/take-a-class/first-aid?latitude=37.5407246&longitude=-77.4360481&searchtype=class&zip=richmond%2C%20va>).

Estimated cost per lead sample: (<https://biotechlabwatertesting.com/faqs-resources/>, <https://www.epa.gov/ground-water-and-drinking-water/basic-information-about-lead-drinking-water>).

Estimated cost of one coliform sample (<https://biotechlabwatertesting.com/faqs-resources/>, <https://www.oakwoodlab.com/>, <https://www.blueridgeanalytical.com/bacteria>).

Estimated cost of nitrate-nitrogen sample:

(<https://biotechlabwatertesting.com/faqs-resources/>, <https://www.oakwoodlab.com/>, <https://wtlmd.com/wastewater-testing-pricing-maryland-md-va-dc-de.php>).

Filter meeting the micron size per NSF 53 or 58:

(<https://lifestraw.com/products/lifestraw-flex-multi-use-water-filter-with-gravity-bag>, <https://www.rei.com/product/215873/grayl-ultrapress-ti-water-filter-and-purifier-bottle?color=COYOTE%20BROWN>).

Chemical water treatment products:

(<https://www.rei.com/product/866996/aquamira-water-treatment-1-oz?color=NONE>, [https://www.amazon.com/Travel-Chlorine-Dioxide-Water-Purification/dp/B0CHXKY8RN/ref=sr\\_1\\_5?crd=35GH9T37YRD33&keywords=Chlorine+dioxide+for+water+treatment&qid=1701979542&s=industrial&prefix=chlorine+dioxide+for+water+treatment%2Cindustrial%2C111&sr=1-5](https://www.amazon.com/Travel-Chlorine-Dioxide-Water-Purification/dp/B0CHXKY8RN/ref=sr_1_5?crd=35GH9T37YRD33&keywords=Chlorine+dioxide+for+water+treatment&qid=1701979542&s=industrial&prefix=chlorine+dioxide+for+water+treatment%2Cindustrial%2C111&sr=1-5), [https://www.amazon.com/Potable-Aqua-Chlorine-Dioxide-Purification/dp/B0023FDQ2O?ref=ast\\_sto\\_dp&th=1](https://www.amazon.com/Potable-Aqua-Chlorine-Dioxide-Purification/dp/B0023FDQ2O?ref=ast_sto_dp&th=1)).

Estimated cost of UV water treatment devices:

<https://www.rei.com/product/847549/katadyn-steripen-ultra-uv-water-purifier>, [https://www.amazon.com/gp/product/B07L52FLJV/ref=ox\\_sc\\_act\\_title\\_1?smid=AP3VA1GJZM3EQ&psc=1](https://www.amazon.com/gp/product/B07L52FLJV/ref=ox_sc_act_title_1?smid=AP3VA1GJZM3EQ&psc=1), <https://www.backcountry.com/steripen-steripen-classic-3-handheld-water-purifier>.

Estimated cost of “Warning” sign: (<https://www.smartsign.com/fos/warning-signs/warning-custom-warning-text-sign/sku-k-3696>, <https://www.mysafetysign.com/safety-signs/custom-warning/saf-sku-s-3058>, <https://www.amazon.com/Custom-Warning-Sign-Personalized-Aluminum/dp/B076JPKZD7?th=1>).

Estimated cost of infographic illustrating a warning to not drink the water: (<https://www.mysafetysign.com/no-drinking-iso-prohibition-sign/sku-is-1101>, <https://www.smartsign.com/fos/not-drinking-water-iso-prohibition-sign/sku-is-1052>, <https://www.compliancesigns.com/pd/do-not-drink-water-symbol-label-label-prohib-54-c-drinking-water>).

Drinking water tests: (<https://www.vdh.virginia.gov/environmental-health/onsite-sewage-water-services-updated/organizations/private-well-water-information/guidance-on-testing-your-private-well-water/>)

Lead in drinking water: (<https://www.vdh.virginia.gov/drinking-water/drinking-water-and-lead/>); EPA manual: 3Ts for Reducing Lead in Drinking Water in Schools and Child Care Facilities: <https://www.epa.gov/system/files/documents/2021-07/epa-3ts-guidance-document-english.pdf>).

The average cost to purchase portable toilet: ([https://www.webstaurantstore.com/polyjohn-pjn3-1001-blue-portable-restroom-with-translucent-top/621PJ31001.html?utm\\_source=google&utm\\_medium=cpc&utm\\_campaign=GoogleShopping&gclid=EAIaIQobChMI\\_5XTn4-AgwMVg0VyCh1NYwRNEAQYASABEgKIwPD\\_BwE](https://www.webstaurantstore.com/polyjohn-pjn3-1001-blue-portable-restroom-with-translucent-top/621PJ31001.html?utm_source=google&utm_medium=cpc&utm_campaign=GoogleShopping&gclid=EAIaIQobChMI_5XTn4-AgwMVg0VyCh1NYwRNEAQYASABEgKIwPD_BwE), [https://www.totalrestroom.com/products/satellite-axxis-portable-restroom-axxis1?variant=40359772389530&currency=USD&utm\\_medium=product\\_sync&utm\\_source=google&utm\\_content=sag\\_organic&utm\\_campaign=sag\\_organic&gad\\_source=1&gclid=EAIaIQobChMI\\_5XTn4-AgwMVg0VyCh1NYwRNEAQYAiABEgI18\\_D\\_BwE](https://www.totalrestroom.com/products/satellite-axxis-portable-restroom-axxis1?variant=40359772389530&currency=USD&utm_medium=product_sync&utm_source=google&utm_content=sag_organic&utm_campaign=sag_organic&gad_source=1&gclid=EAIaIQobChMI_5XTn4-AgwMVg0VyCh1NYwRNEAQYAiABEgI18_D_BwE), [https://www.globalindustrial.com/p/global-ii-portable-restroom-70-gallon-tank-44-w-x-48-d-x-88-h-sand?infoParam.campaignId=T9F&gad\\_source=1&gclid=EAIaIQobChMI\\_5XTn4-AgwMVg0VyCh1NYwRNEAQYBSABEgJfm\\_D\\_BwE](https://www.globalindustrial.com/p/global-ii-portable-restroom-70-gallon-tank-44-w-x-48-d-x-88-h-sand?infoParam.campaignId=T9F&gad_source=1&gclid=EAIaIQobChMI_5XTn4-AgwMVg0VyCh1NYwRNEAQYBSABEgJfm_D_BwE))

The average cost to service a portable toilet: ([https://djseptic.com/Schedule\\_and\\_Pricing.html](https://djseptic.com/Schedule_and_Pricing.html), <https://www.clarkecounty.gov/residents/septic-pump-out>, <https://www.angi.com/articles/how-much-does-septic-tank-pumping-cost.htm>)

Estimated average cost of a monthly rental for a portable toilet with service: (<https://www.fixr.com/costs/portable-toilets#:~:text=The%20average%20cost%20to%20rent,%24100%20to%20%24500%20per%20month>, <https://www.johntogo.com/blog/seasonal-long-term-porta-potty-rental/>, [https://rent.portapotty.pro/virginia/portable-toilet-rental-wytheville-va/?gclid=EAIaIQobChMIiNO735OAgwMVxGRHAR0IAw5XEAMYASAAEgJuaPD\\_BwE](https://rent.portapotty.pro/virginia/portable-toilet-rental-wytheville-va/?gclid=EAIaIQobChMIiNO735OAgwMVxGRHAR0IAw5XEAMYASAAEgJuaPD_BwE))

The estimated average cost of a solar lighting unit:

(<https://www.amazon.com/dp/B0BZPG4H6L?ref=posts&th=1>,  
[https://www.amazon.com/gp/product/B0BFWVPMF3/ref=ox\\_sc\\_act\\_title\\_1?smid=A7F3QFM911851&psc=1](https://www.amazon.com/gp/product/B0BFWVPMF3/ref=ox_sc_act_title_1?smid=A7F3QFM911851&psc=1),  
[https://www.amazon.com/gp/product/B0BYVFZ5F6/ref=ox\\_sc\\_act\\_title\\_1?smid=ATV7A28X8CZOA&th=1](https://www.amazon.com/gp/product/B0BYVFZ5F6/ref=ox_sc_act_title_1?smid=ATV7A28X8CZOA&th=1))

The estimated average cost for hand sanitizer and a dispenser:

(<https://www.uline.com/Product/Detail/H-2288/Hand-Sanitizers/Purell-Hand-Sanitizer-Push-Button-Dispenser>,  
[https://www.amazon.com/gp/product/B002VHMY2C/ref=ox\\_sc\\_act\\_title\\_1?smid=A327Q7A6AXAF73&psc=1](https://www.amazon.com/gp/product/B002VHMY2C/ref=ox_sc_act_title_1?smid=A327Q7A6AXAF73&psc=1),  
[https://www.amazon.com/gp/product/B004F7LDFK/ref=ox\\_sc\\_act\\_title\\_1?smid=A2AUGB6PX1UPPG&psc=1](https://www.amazon.com/gp/product/B004F7LDFK/ref=ox_sc_act_title_1?smid=A2AUGB6PX1UPPG&psc=1)).

The estimated average cost to purchase a portable handwashing sink is was determined from online research (Poly John, MOBI, Monsam, Cambro, and Regency) and industry representative outreach (Crown Verity, Satellite) per documentation available at

[https://townhall.virginia.gov/L/GetFile.cfm?File=58\6160\9888\ORM\\_EconomicImpact\\_VDH\\_9888\\_v1.pdf](https://townhall.virginia.gov/L/GetFile.cfm?File=58\6160\9888\ORM_EconomicImpact_VDH_9888_v1.pdf)).

Estimated cost for lifeguard certification: (<https://www.redcross.org/take-a-class/lifeguarding?latitude=37.5407246&longitude=-77.4360481&searchtype=class&zip=richmond%2C%20va>).

Average cost of a custom-made sign: (<https://www.smartsign.com/best-selling-custom-text-sign/sku-s-3078-all>, <https://www.signs.com/plastic-signs/>,  
<https://www.customsigns.com/18-x-12-vinyl-aluminum-sign>)

Average cost of a first aid kit: (<https://www.ussafetykits.com/first-aid-kits/all-purpose-first-aid-kits/summer-camp-first-aid-kits/>).

Average cost of a reaching pole or shepherd's crook: ([https://www.marine-rescue.com/telescoping-reaching-pole-6-12.html?gclid=EAIAIQobChMIxLKmy9CAgwMVmUNHAR2AXwxFEAQYBSABEgJ5zPD\\_BwE](https://www.marine-rescue.com/telescoping-reaching-pole-6-12.html?gclid=EAIAIQobChMIxLKmy9CAgwMVmUNHAR2AXwxFEAQYBSABEgJ5zPD_BwE), <https://www.poolweb.com/products/16-foot-rescue-pole-two-8-foot-poles-connected-with-two-brass-bolts-and-locknuts?variant=34910846386314>, [https://tcpglobal.com/products/usp-lf-018?currency=USD&stkn=ea543c203691&gad\\_source=1&gclid=EAIAIQobChMIxLKmy9CAgwMVmUNHAR2AXwxFEAQYDSABEgJM8fD\\_BwE](https://tcpglobal.com/products/usp-lf-018?currency=USD&stkn=ea543c203691&gad_source=1&gclid=EAIAIQobChMIxLKmy9CAgwMVmUNHAR2AXwxFEAQYDSABEgJM8fD_BwE),  
<https://www.poolweb.com/products/life-hook-with-16-foot-rescue-pole-and-bolt-set-two-8-foot-poles-connected-with-brass-bolts?variant=34910846451850>)

Average cost of a ring buoy, rescue tube, or throw bag:  
([https://www.amazon.com/gp/product/B09W9BKWDK/ref=ox\\_sc\\_act\\_title\\_1?smid=A27WUJ438R6AJZ&psc=1](https://www.amazon.com/gp/product/B09W9BKWDK/ref=ox_sc_act_title_1?smid=A27WUJ438R6AJZ&psc=1), <https://www.thefirestore.com/Kemp-USA-Coast-Guard-Approved-Ring-Buoy?quantity=1&product-color=1510&product-size=1827>, [https://cpr-savers.com/Coast-Guard-Approved-Ring-Buoy\\_p\\_3967.html](https://cpr-savers.com/Coast-Guard-Approved-Ring-Buoy_p_3967.html), <https://www.webstaurantstore.com/kemp-usa-40-red-rescue-tube-with-plastic-clips-and-guard-logo-10202red/89610202RED.html>, [https://www.amazon.com/gp/product/B01M0YCY12/ref=ox\\_sc\\_act\\_title\\_1?smid=A1MK3EL1DZNNOE&psc=1](https://www.amazon.com/gp/product/B01M0YCY12/ref=ox_sc_act_title_1?smid=A1MK3EL1DZNNOE&psc=1), [https://cpr-savers.com/KEMP-40-Rescue-Tube-with-Plastic-Clips\\_p\\_3962.html](https://cpr-savers.com/KEMP-40-Rescue-Tube-with-Plastic-Clips_p_3962.html), [https://www.amazon.com/gp/product/B0BFV7KTRL/ref=ox\\_sc\\_act\\_title\\_1?smid=AR802LIE7JG02&psc=1](https://www.amazon.com/gp/product/B0BFV7KTRL/ref=ox_sc_act_title_1?smid=AR802LIE7JG02&psc=1), <https://www.webstaurantstore.com/kemp-usa-throw-bag-with-100-of-3-8-thick-yellow-rope-and-bengal-safety-whistle-10-228-100/89610228100.html>, [https://www.amazon.com/gp/product/B09W181H65/ref=ox\\_sc\\_act\\_title\\_1?smid=A11IWFUTIL441G&psc=1](https://www.amazon.com/gp/product/B09W181H65/ref=ox_sc_act_title_1?smid=A11IWFUTIL441G&psc=1))

Average cost of a backboard equipped with head immobilizer and sufficient straps: (<https://www.globalindustrial.com/p/aquatic-eg-plastic-spineboard-with-head-blocks-and-straps>, <https://www.poolweb.com/products/spineboard-with-straps-and-head-immobilizer-orange-combo?variant=34911053578378>, <https://thelifeguardstore.com/cj-plastic-rescue-6-backboard.html>)

Average cost of a U.S. Coast Guard approved personal floatation device: (<https://www.globalindustrial.com/p/offshore-life-vest-uscg-type-i-collared-orange-adult-universal-dx320rtj>, <https://www.globalindustrial.com/p/life-jacket-child-20-001-child>, <https://www.westmarine.com/west-marine-type-ii-near-shore-buoyant-life-jackets-kids-P0112474.html>)

Average cost of a throw rescue device:  
([https://www.amazon.com/gp/product/B09W9BKWDK/ref=ox\\_sc\\_act\\_title\\_1?smid=A27WUJ438R6AJZ&psc=1](https://www.amazon.com/gp/product/B09W9BKWDK/ref=ox_sc_act_title_1?smid=A27WUJ438R6AJZ&psc=1), <https://www.thefirestore.com/Kemp-USA-Coast-Guard-Approved-Ring-Buoy?quantity=1&product-color=1510&product-size=1827>, [https://cpr-savers.com/Coast-Guard-Approved-Ring-Buoy\\_p\\_3967.html](https://cpr-savers.com/Coast-Guard-Approved-Ring-Buoy_p_3967.html), <https://www.webstaurantstore.com/kemp-usa-40-red-rescue-tube-with-plastic-clips-and-guard-logo-10202red/89610202RED.html>, [https://www.amazon.com/gp/product/B01M0YCY12/ref=ox\\_sc\\_act\\_title\\_1?smid=A1MK3EL1DZNNOE&psc=1](https://www.amazon.com/gp/product/B01M0YCY12/ref=ox_sc_act_title_1?smid=A1MK3EL1DZNNOE&psc=1), [https://cpr-savers.com/KEMP-40-Rescue-Tube-with-Plastic-Clips\\_p\\_3962.html](https://cpr-savers.com/KEMP-40-Rescue-Tube-with-Plastic-Clips_p_3962.html), [https://www.amazon.com/gp/product/B0BFV7KTRL/ref=ox\\_sc\\_act\\_title\\_1?smid=AR802LIE7JG02&psc=1](https://www.amazon.com/gp/product/B0BFV7KTRL/ref=ox_sc_act_title_1?smid=AR802LIE7JG02&psc=1), <https://www.webstaurantstore.com/kemp-usa-throw-bag-with-100-of-3-8-thick-yellow-rope-and-bengal-safety-whistle-10-228-100/89610228100.html>, [https://www.amazon.com/gp/product/B09W181H65/ref=ox\\_sc\\_act\\_title\\_1?smid=A11IWFUTIL441G&psc=1](https://www.amazon.com/gp/product/B09W181H65/ref=ox_sc_act_title_1?smid=A11IWFUTIL441G&psc=1))

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

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>There are no monetizable direct, or indirect costs associated with maintaining the status quo (no change to the regulation).</p> <p>The potential monetizable indirect benefit to maintaining the status quo (no change to the regulation) may include the agency’s cost saving on the additional inspection described in Table 1a. Maintaining the status quo could reduce the potential of an additional inspection at an estimated cost to the agency of \$74.31 per inspection (staff cost estimator &amp; LHD survey*). There were 118 permitted overnight summer camps in Virginia in 2023. <b>The additional inspection requirement would potentially cost the agency \$8,768.58 per year.</b> However, this amount assumes all facilities will require a pre-opening and a routine inspection. This will not always be the case as many if not most facilities will not require a pre-opening inspection. *Estimated average EHS salary at \$51,156/year (fringe benefits not included in estimated salary).</p> <p>Another potential monetizable indirect benefit to maintaining the status quo may include the absence of lead testing requirements. Most resident camps are serviced by a public water supply or are regulated by the Office of Drinking Water (ODW), which requires regular water sampling and testing of nitrate and bacteriological samples. Lead is not part of the routine monitoring required by ODW and therefore may incur an <b>estimated cost of approximately \$57 per lead sample.</b> Camp drinking water locations will vary with each camp based upon size and structure. This potential cost savings may not outweigh the benefit of a preventative measure to protect the health of children. The only way to know if lead is present in a water system is to test the water. The EPA developed a program to assist schools and childcare facilities in determining the presence of lead in water supplies as a means to reduce potential lead exposure to children. The agency considers that if those protections are recommended for childcare facilities that it is appropriate that those same protections be extended to resident camps.</p> <p>There are no monetizable direct benefits to maintaining the status quo (no change to the regulation). Setting and meeting high standards for the health and safety of children and minor staff in resident camps is beneficial. Standards also support the accountability that parents’ expect when sending their children to a camp. It is anticipated that many or most resident camps already meet the provisions outlined in Table 1a, including background checks, water sampling (with the exception of lead testing), water treatment for field outings, sanitary facilities (including lighting and hand hygiene equipment and supplies), lifeguards and attendants, and safety equipment. Thus, it is expected that the formalization of the proposed requirements will not result in significant additional operational aspects, and the associated costs, beyond those</p>
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	<p>already in place at Virginia’s resident camps. The diverse operation and design of resident camps prevents the estimation of the new costs that would be faced by an average or typical camp from the proposed requirements, such as supervision, health care and safety requirements (including first aid and CPR certification), and signage. However, the <i>new</i> costs for any one camp are expected to be far lower than the full costs of compliance with the proposed requirements.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) <b>\$8,768.58</b>
(3) Net Monetized Benefit	\$8,768.58	
(4) Other Costs & Benefits (Non-Monetized)	<p>The no-action alternative to revising the Regulations would allow resident camp permitting, design, operation, maintenance, and health requirements to continue to remain unclear, conflicting, unaddressed, and/or outdated. This no-action alternative would result in non-monetized costs of inconsistent interpretation and enforcement of resident camps. In addition, there would be inadequate provisions for lodging, sanitary facilities, vector and disease control, camper safety, or administrative processes. Providing clear and up-to-date standards will help provide consistent oversight and management of camps while reducing the risk of illness and injury at resident camps throughout the Commonwealth. For the reasons previously stated, the agency is proposing to update and clarify all sections of the Regulations for Resident Camps, and to re-organize the overall content in a manner that is easy to follow, read, and understand. These proposed regulations pose to benefit camps, campers, and campers’ parents for the reasons stated in box (1) of this table. Implementation of state-wide regulations ensures that all camps are meeting evidence-based standards, avoids a patchwork camp-by-camp approach that results in varying quality and outcomes, and assures Virginia’s parents that no matter which camp they choose, they will know that a state permit means the camp meets those standards.</p> <p>Further, a no-action alternative would not align with the purpose and intent of the periodic review process required by Code of Virginia § 2.2-4017. Periodic review of regulations, and the Periodic Review of Existing Regulations process outlined in the August 2022 ORM Procedure Memo (Memo). The Memo that states that existing regulations shall be reviewed to “determine whether they should be continued without change or be amended or repealed, consistent with the stated objectives of applicable law, to minimize the economic impact on small businesses.” The periodic review of the Regulations resulted in a recommendation to amend the Regulations as current Regulations did not appear to be consistent with the stated objectives of the Code of Virginia</p>	

	§ 35.1-16. Regulations governing summer camps. Specifically, the current regulations do not include a permit/licensure procedure, which § 35.1-16 mandates.
(5) Information Sources	ORM Procedures Manual: <a href="https://townhall.virginia.gov/ORM-Procedures-Memo-v2.pdf">https://townhall.virginia.gov/ORM-Procedures-Memo-v2.pdf</a>

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>During the development of the proposed amendments, stakeholders voiced the idea of exempting resident camps that are accredited by the American Camps Association (ACA), a national non-profit organization that provides a voluntary accreditation standard for camps. Exempting ACA accredited camps from regulation would, in a sense, establish performance standards for small businesses to replace design or operational standards required in the proposed regulation. This exemption would result in the agency issuing a permit to operate a resident camp based simply on the ACA accreditation. However, not all resident camps in Virginia are accredited through the ACA. Some camps are associated with different organizations, such as the Boy Scouts of America, and would not consider accreditation through the ACA. Other camps choose not to be accredited and still maintain sufficient operation and management of their camp.</p> <p><b>The monetizable direct costs associated with the alternative approach would include ACA Accreditation costs. The ACA reports that accredited-camp rates are based on the camp's operating budget and begin at \$808.</b></p> <p>There are no monetizable direct benefits associated with the alternative approach.</p> <p>There are no monetizable indirect benefits associated with the alternative approach.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) <b>\$808.00</b>	(b)
(3) Net Monetized Benefit	-\$808.00	
(4) Other Costs & Benefits (Non-Monetized)	Other costs associated with the alternative approach includes the variability of ACA accreditation. The agency would have no influence or oversight over a national accreditation service that may or may not meet Virginia standards of health or safety or other regulatory requirements	

	through other agencies or departments. This in turn could result in inconsistent permitting as some camps would be required to meet the regulations, while other camps would be permitted as ACA accredited without agency confirmation of meeting health and safety standards. Further, such inconsistent implementation of standards may result in improper management of a facility permitted by the agency and an inability for the agency to enforce efforts to protect health and safety of campers and camp staff.
(5) Information Sources	ACA Accreditation and volunteer cost: <a href="https://www.acacamps.org/membership/benefits">https://www.acacamps.org/membership/benefits</a> ACA volunteers: <a href="https://www.acacamps.org/accreditation/accreditation-volunteers">https://www.acacamps.org/accreditation/accreditation-volunteers</a> ; <a href="https://www.acacamps.org/accreditation/volunteers/become-visitor">https://www.acacamps.org/accreditation/volunteers/become-visitor</a>

**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 or associations such as the American Camp Association or similar entities may be affected by this action in regard to notification and support to their constituents. Local and tribal governments, school divisions or other authorities are likely not affected by this action, unless they implement a local ordinance or other code specific to resident camps, or if they operate a resident camp.	
	There are no monetizable direct or indirect costs or benefits to local partners.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0	(b) 0
(3) Other Costs & Benefits (Non-Monetized)	Potential indirect benefits to local partners associated with the proposed amendment may include improved public health and safety protections for resident camps. The modernization of regulations could improve business and public perception of the agency and the Commonwealth’s resident camps through the provision of a consistently implemented regulation that increases public health protections for children.	
(4) Assistance		

(5) Information Sources	
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**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)	There are no monetizable direct or indirect costs or benefits for families related to this proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) 0	(b) 0
(3) Other Costs & Benefits (Non-Monetized)	Other benefits to families related to this change include increased protections of health and safety for children who attend a resident camp. Parents who send their children to camp will be able to reference modern and up-to-date regulations that are easy to read and understand and that align with industry standards for resident camps.	
(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>Many resident camps are small businesses. As a result, the potential monetizable direct costs and benefits for small businesses related to the proposed change are outlined in Table 1a.</p> <p>Small businesses engaged in summer camp adjunct services may incur monetizable indirect benefits in service fees as they may provide support or supplies to a resident in an effort to ensure camps are in compliance with the regulation. The monetizable benefit is undetermined due to variability in service and need.</p>
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Table 1a	(b) Undetermined
(3) Other Costs & Benefits (Non-Monetized)	Reference Table 1a. Businesses will be able to increase health and safety protections through updated standards that are well defined, easy to read and understand, consistently implemented across the state, and that align with current industry standards and expectations.	
(4) Alternatives		
(5) Information Sources	Reference Table 1a	

### **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*

<b>VAC Section(s) Involved*</b>	<b>Authority of Change</b>	<b>Initial Count</b>	<b>Additions</b>	<b>Subtractions</b>	<b>Total Net Change in Requirements</b>
12VAC5-440-10 (repeal)	<b>(M/A):</b>	<b>0</b>			0
	<b>(D/A):</b>	<b>0</b>			0
	<b>(M/R):</b>	<b>1</b>		-1	-1
	<b>(D/R):</b>	<b>2</b>		-2	-2
12VAC5-440-20 (repeal)	<b>(M/A):</b>	<b>0</b>			0
	<b>(D/A):</b>	<b>0</b>			0
	<b>(M/R):</b>	<b>1</b>		-1	-1
	<b>(D/R):</b>	<b>4</b>		-4	-4
12VAC5-440-30 (repeal)	<b>(M/A):</b>	<b>0</b>			0
	<b>(D/A):</b>	<b>0</b>			0
	<b>(M/R):</b>	<b>0</b>			0
	<b>(D/R):</b>	<b>2</b>		-2	-2
	<b>(M/A):</b>	<b>0</b>			0

12VAC5-440-40 (repeal)	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>0</b>			<b>0</b>
	<b>(D/R):</b>	<b>16</b>		<b>-16</b>	<b>-16</b>
12VAC5-440-50 (repeal)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>1</b>		<b>-1</b>	<b>-1</b>
	<b>(D/R):</b>	<b>10</b>		<b>-10</b>	<b>-10</b>
12VAC5-440-60 (repeal)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>3</b>		<b>-3</b>	<b>-3</b>
	<b>(D/R):</b>	<b>5</b>		<b>-5</b>	<b>-5</b>
12VAC5-440-70 (repeal)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>0</b>			<b>0</b>
	<b>(D/R):</b>	<b>2</b>		<b>-2</b>	<b>-2</b>
12VAC5-440-80 (repeal)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>1</b>		<b>-1</b>	<b>-1</b>
	<b>(D/R):</b>	<b>1</b>		<b>-1</b>	<b>-1</b>
12VAC5-440-90 (repeal)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>0</b>			<b>0</b>
	<b>(D/R):</b>	<b>0</b>			<b>0</b>
12VAC5-440-100 (all new starting with 100)	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>0</b>			<b>0</b>
	<b>(D/R):</b>	<b>0</b>			<b>0</b>
12VAC5-440-120	<b>(M/A):</b>	<b>0</b>			<b>0</b>
	<b>(D/A):</b>	<b>0</b>			<b>0</b>
	<b>(M/R):</b>	<b>0</b>			<b>0</b>
	<b>(D/R):</b>	<b>0</b>			<b>0</b>
	<b>(M/A):</b>	<b>0</b>			<b>0</b>

12VAC5-440-130	(D/A):	0	12		+12
	(M/R):	0			0
	(D/R):	0	9		+9
12VAC5-440-140	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			+3
	(D/R):	0			0
12VAC5-440-150	(M/A):	0			0
	(D/A):	0	5		+5
	(M/R):	0			0
	(D/R):	0	11		+11
12VAC5-440-160	(M/A):	0	4		+4
	(D/A):	0			0
	(M/R):	0	8		+8
	(D/R):	0	2		+2
12VAC5-440-170	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	2		+2
	(D/R):	0			0
12VAC5-440-180	(M/A):	0	4		+4
	(D/A):	0	6		+6
	(M/R):	0			0
	(D/R):	0	1		+1
12VAC5-440-190	(M/A):	0	1		+1
	(D/A):	0	1		+1
	(M/R):	0			0
	(D/R):	0	1		+1
12VAC5-440-200	(M/A):	0	7		+7
	(D/A):	0	2		+2
	(M/R):	0	2		+2
	(D/R):	0	5		+5
	(M/A):	0			0

12VAC5-440-210	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	12		+12
12VAC5-440-220	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	5		+5
12VAC5-440-230	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	8		+8
12VAC5-440-240	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	48		+48
12VAC5-440-250	(M/A):	0	1		+1
	(D/A):	0			0
	(M/R):	0	2		+2
	(D/R):	0	4		+4
12VAC5-440-260	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	14		+14
12VAC5-440-270	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	1		+1
	(D/R):	0	6		+6
12VAC5-440-280	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	8		+8
	(D/R):	0	23 (plus 32 from DIBR)		+55
	(M/A):	0			0

12VAC5-440-290	(D/A):	0			0
	(M/R):	0	3		+3
	(D/R):	0	11		+11
12VAC5-440-300	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	1		+1
	(D/R):	0	1		+1
12VAC5-440-310	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	4		+4
	(D/R):	0	23		+23
12VAC5-440-320	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	2		+2
	(D/R):	0	5		+5
12VAC5-440-330	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	5		+5
12VAC5-440-340	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	7		+7
	(D/R):	0	20		+20
12VAC5-440-350	(M/A):	0			0
	(D/A):	0	1		+1
	(M/R):	0			0
	(D/R):	0	15		+15
12VAC5-440-360	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	20		+20
	(M/A):	0			0

12VAC5-440-370	(D/A):	0			0
	(M/R):	0	2		+2
	(D/R):	0	6		+6
12VAC5-440-380	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	3		+3
12VAC5-440-390	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	2		+2
	(D/R):	0	6		+6
12VAC5-440-400	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0	4		+4
	(D/R):	0	21		+21
DIBRS *(specified here but counted in section 280)	(M/A):	0			0
	(D/A):	0			0
	(M/R):	0			0
	(D/R):	0	32*		0*
<b>Grand Total of Changes in Requirements:</b>	(M/A):	+17			
	(D/A):	+27			
	(M/R):	+44			
	(D/R):	+275			

*Cost Reductions or Increases (if applicable)*

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
12VAC5-440 et seq.	Repeal of sections 10-90; addition of sections 100-400	\$0	As outlined in Table 1a: \$13,754.69	Overall cost increase of \$13,754.69

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

<b>VAC Section(s) Involved*</b>	<b>Description of Regulatory Change</b>	<b>Overview of How It Reduces or Increases Regulatory Burden</b>
12VAC5-440 et seq.	Repeal of sections 10-90; addition of sections 100-400	<p>§ 35.1-16 of the Code of Virginia outlines the minimal content of the required regulations governing summer camps. The Regulations as written do not meet all the Code requirements, including provisions that clearly define and outline the requirements to meet and maintain:</p> <ul style="list-style-type: none"> <li>• An approved drinking water supply,</li> <li>• An approved sewage disposal system,</li> <li>• Solid waste disposal provisions,</li> <li>• Adequate and sanitary preparation, handling, protection, and preservation of food,</li> <li>• Vector and pest control</li> <li>• Toilet, swimming, and bathing facilities, including showers, or</li> <li>• A procedure for obtaining a license.</li> </ul> <p>The amendment will include the addition of sections related to general administrative provisions (definitions, variances, and permitting), inspections and enforcement, and staffing policies that are absent from current regulation. Many of the changes refine and provide further clarity to existing regulations, including camp location, water supplies, food handling, sewage and solid waste disposal, general sanitation, swimming facilities, and the reporting of contagious</p>

		<p>disease and outbreaks. Significant changes include replacing the title “Summer Camp” with “Resident Camp”, amending out-of-date provisions, incorporating health and safety provisions that have become part of industry standards since the inception of the regulations over 70 years ago, and reorganizing sections to make them easier to understand and follow.</p> <p>Reference Table 1 of TH-02 for summary of individual section change intent, rationale, and impacts.</p>