

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12VAC5-481
VAC Chapter title(s)	Virginia Radiation Protection Regulations
Action title	Guidance Document Amendments for ORH-744, 745, 746, 747
Date this document prepared	7/14/2023
Regulatory Stage (including Issuance of Guidance Documents)	Guidance document amendment

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>This action is to amend ORH-744, ORH-745, ORH-746, and ORH-747 which contain best practices for radiation safety for x-ray registrants. These documents are tailored to x-ray operators of general radiographic systems, those working in dental and veterinary practices, and those using non-medical x-ray units. Proposed amendments include removing outdated information related to x-ray film, fixing minor typos and grammatical errors, clarifying language to improve readability, and utilizing the Office of Radiological Health’s (ORH) standard guidance document template.</p> <p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: This action will update the guidance documents ORH-744, 745, 746, and 747 to improve clarity and standardize the format of the document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p>	
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	<p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: This action will update the guidance documents ORH-744, 745, 746, and 747 to improve clarity and standardize the format of the document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	<p>Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents. If the decision were to maintain the status quo, VDH would miss an opportunity to improve the professional appearance of the documents and provide needed updates to the regulated community.</p>	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: If these guidance documents were repealed, many of Virginia’s x-ray registrants would be required to develop their own written safety procedures according to 12VAC5-481-1591 A(4). This would likely require the burden of additional staff time for some registrants.</p> <p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: No direct benefits are associated with the alternative approach t</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	Alternative approaches include the repeal of ORH-744, 745, 746, and 747. Many x-ray registrants in Virginia utilize ORH-744, 745, 746, or 747 to satisfy the requirement that they make written safety procedures available to x-ray operators. Repeal of these guidance documents would result in the shifting of the burden to develop written safety procedures from VDH-ORH to the registrant, which would result in increased staff time and inconsistent written safety procedures. Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents ORH believes ORH-744, 745, 746, and 747 could be improved through minor amendments. ORH-744, 745, 746, and 747 still contain information that is important to the regulated community.	
(5) Information Sources	12VAC5-481	

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)	<p>Direct Costs: No direct costs to local partners are associated with this action.</p> <p>Indirect Costs: No indirect costs to local partners are associated with this action.</p> <p>Direct Benefits: No direct benefits to local partners are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: This action will update the guidance documents ORH-744, 745, 746, and 747 to improve clarity and standardize the format of the document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(4) Assistance	No assistance to or from local partners is required as a result of the amendment of these guidance documents.	
(5) Information Sources	12VAC5-481	

Impacts on Families

Use this chart to describe impacts on families. See Part 8 of the ORM Cost Impact Analysis Guidance for additional guidance.

Table 3: Impact on Families

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs to families are associated with this action.</p> <p>Indirect Costs: No indirect costs to families are associated with this action.</p> <p>Direct Benefits: No direct benefits to families are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: This action will update the guidance documents ORH-744, 745, 746, and 747 to improve clarity and standardize the format of the document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(4) Information Sources	12VAC5-481	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: No direct costs to small businesses are associated with this action.</p> <p>Indirect Costs: No indirect costs to small businesses are associated with this action.</p> <p>Direct Benefits: No direct benefits to small businesses are associated with this action. No significant changes to the content of ORH-744, 745, 746, or 747 are proposed.</p> <p>Indirect Benefits: This action will update the guidance documents ORH-744, 745, 746, and 747 to improve clarity and standardize the format of the document.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p> <p>(a) \$0</p>	<p>Direct & Indirect Benefits</p> <p>(b) \$0</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.</p>	
<p>(4) Alternatives</p>	<p>Alternatives to this action include 1) retaining ORH-744, 745, 746, and 747 as is, or 2) repealing ORH-744, 745, 746, and 747. ORH believes ORH-744, 745, 746, and 747 could be improved through minor amendments. ORH-744, 745, 746, and 747 still contain information that is important to the regulated community.</p>	
<p>(5) Information Sources</p>	<p>12VAC5-481</p>	

Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved	Initial Count	Additions	Subtractions	Net Change
ORH-744	0	0	0	0
ORH-745	0	0	0	0
ORH-746	0	0	0	0
ORH-747	0	0	0	0

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

Other Decreases or Increases in Regulatory Stringency (if applicable)

VAC Section(s) Involved	Description of Regulatory Change	Overview of How It Reduces or Increases Regulatory Burden

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

Title of Guidance Document	Original Length	New Length	Net Change in Length
ORH-744	782 words	924 words (Note: Page 2 contains new revision history and contact sections.)	+142 words
ORH-745	539 words	894 words (Note: Page 2 contains new revision history and contact sections.)	+355 words
ORH-746	531 words	814 words (Note: Page 2 contains new	+283 words

		revision history and contact sections.)	
ORH-747	560 words	674 words (Note: Page 2 contains new revision history and contact sections.)	+114 words