

Office of Regulatory Management  
Economic Review Form

|  |  |
|--|--|
| <b>Agency name</b>   | Board of Medicine, Department of Health Professions  |
| <b>Virginia Administrative Code (VAC) Chapter citation(s)</b>      | 18VAC 85-20  |
| <b>VAC Chapter title(s)</b>  | Regulations Governing the Practice of Medicine, Osteopathic Medicine, Podiatry, and Chiropractic       |
| <b>Action title</b>  | Removal of requirement to provide documentation of continuing competency for reactivation of a license |
| <b>Date this document prepared</b>                                 | 7/16/2025  |
| <b>Regulatory Stage (including Issuance of Guidance Documents)</b> | Fast-Track   |

### **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) | This action removes the requirement that documentation be provided for continuing education compliance during the reinstatement or reactivation process and instead requires an attestation to be performed. This is a simpler requirement for those seeking to reinstate or reactivate their license and aligns this process with general renewal requirements of licensees. There are no direct or indirect costs or benefits associated with this action. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A  |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A  |                            |
| (5) Information Sources                            |  |                            |

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

|  |  |                            |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | Under the status quo, someone reactivating or reinstating their license must show documentation of completing CE, which could be burdensome if someone has been out of practice longer than one renewal cycle. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A  |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A  |                            |
| (5) Information Sources                            |  |                            |

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

|  |   |                            |
|--|---|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no alternative approach to consider. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                       | Direct & Indirect Benefits |
|  | (a) N/A                                       | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A   |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | N/A   |                            |
| (5) Information Sources                            |   |                            |

**Impact on Local Partners**

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

**Table 2: Impact on Local Partners**

|  |                                       |                            |
|--|---------------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on local partners. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs               | Direct & Indirect Benefits |
|  | (a) N/A                               | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                                   |                            |
| (4) Assistance                                     |                                       |                            |
| (5) Information Sources                            |                                       |                            |

**Impacts on Families**

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

**Table 3: Impact on Families**

|  |                                 |                            |
|--|---------------------------------|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There is no impact on families. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs         | Direct & Indirect Benefits |
|  | (a) N/A                         | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                             |                            |
| (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) | There is no impact on small businesses. |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs                 | Direct & Indirect Benefits |
|  | (a) N/A                                 | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | N/A                                     |                            |
| (4) Alternatives                                   |   |                            |

|                         |  |
|-------------------------|--|
| (5) Information Sources |  |
|-------------------------|--|

**Changes to Number of Regulatory Requirements**

**Table 5: Regulatory Reduction**

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

*Change in Regulatory Requirements*

| VAC Section(s) Involved*         | Authority of Change | Initial Count | Additions | Subtractions                                   | Total Net Change in Requirements |
|----------------------------------|---------------------|---------------|-----------|--|----------------------------------|
| 18VAC85-20                       | (M/A):              |               |           |  |                                  |
|                                  | (D/A):              |               |           |  |                                  |
|                                  | (M/R):              |               |           |  |                                  |
|                                  | (D/R):              |               | 4         | 4  | 0                                |
| <b>No change in requirements</b> |                     |               |           | <b>Grand Total of Changes in Requirements:</b> | (M/A):                           |
|                                  |                     |               |           |  | (D/A):                           |
|                                  |                     |               |           |  | (M/R):                           |
|                                  |                     |               |           |  | (D/R):                           |

**Key:**

*Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:*

**(M/A):** Mandatory requirements mandated by federal and/or state statute affecting the agency itself

**(D/A):** Discretionary requirements affecting agency itself

**(M/R):** Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

**(D/R):** Discretionary requirements affecting external parties, including other agencies

*Cost Reductions or Increases (if applicable)*

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

*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)*

| <b>Title of Guidance Document</b> | <b>Original Word Count</b> | <b>New Word Count</b> | <b>Net Change in Word Count</b> |
|-----------------------------------|----------------------------|-----------------------|---------------------------------|
|                                   |                            |                       |                                 |
|                                   |                            |                       |                                 |

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