

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12 VAC 5-31
VAC Chapter title(s)	Virginia Emergency Medical Services Regulations
Action title	Amend Regulations after Enactment of Chapter 459 of the 2025 Acts of Assembly
Date this document prepared	07/21/2025
Regulatory Stage (including Issuance of Guidance Documents)	Final Exempt

Cost Benefit Analysis

Complete Tables 1a and 1b for all regulatory actions. You do not need to complete Table 1c if the regulatory action is required by state statute or federal statute or regulation and leaves no discretion in its implementation.

Table 1a should provide analysis for the regulatory approach you are taking. Table 1b should provide analysis for the approach of leaving the current regulations intact (i.e., no further change is implemented). Table 1c should provide analysis for at least one alternative approach. You should not limit yourself to one alternative, however, and can add additional charts as needed.

Report both direct and indirect costs and benefits that can be monetized in Boxes 1 and 2. Report direct and indirect costs and benefits that cannot be monetized in Box 4. See the ORM Regulatory Economic Analysis Manual for additional guidance.

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct monetized costs associated with this exempt regulatory action</p> <p>Indirect Costs: There are potential limited cost associated with adding the second agency’s name to the apparatus for agencies that choose to relabel eligible vehicles, however, these costs vary to a degree that OEMS is unable to estimate.</p> <p>Direct Benefits: There are no direct monetized benefits associated with this exempt regulatory action.</p> <p>Indirect Benefits: This action may result in lessening administrative burdens on agencies as less need for variances exists, resulting in less staff time to review variance requests..</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	Not applicable	
(4) Other Costs & Benefits (Non-Monetized)	Stakeholder satisfaction; streamlined vehicle branding; elimination of waiver needs	
(5) Information Sources	Office of Emergency Medical Services	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct monetized costs associated with maintaining the status quo.</p> <p>Indirect Costs: Administrative burden and staff time for waiver review. The average waiver request processing time is between 3 to 6 months. It involves OEMS staff, localities governing body, along with the State EMS Advisory Board (Transportation and Rules and Regulation Committees).</p> <p>Direct Benefits: There are no direct monetized benefits of maintaining the status quo.</p>	
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	Indirect Benefits: There are no indirect monetized benefits to maintaining the status quo.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b)
(3) Net Monetized Benefit	None	
(4) Other Costs & Benefits (Non-Monetized)	May erode operational efficiency and community trust in shared fire/EMS services	
(5) Information Sources	OEMS internal review; concerns from combination departments and their respective stakeholder representatives.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Section not applicable as this is a mandatory action resulting from a legislative change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(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)	<p>Direct Costs: Direct monetized costs will vary based on EMS agencies’ vehicle relabeling needs. However, this regulatory change reduces the regulatory requirements for marking, which will potentially result in reduced costs</p> <p>Indirect Costs: There are no indirect monetized costs on local partners associated with this exempt action</p> <p>Direct Benefits: Direct monetized benefits associated with this action will vary based on EMC agencies’ needs, but a reduction in costs associated with vehicle relabeling is expected, ultimately providing a net monetized benefit to agencies choosing to relabel vehicles.</p> <p>Indirect Benefits: Reduced need for local legal or administrative review for compliance</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) Not monetized
(3) Other Costs & Benefits (Non-Monetized)	Improved regulatory flexibility for rural and suburban departments	
(4) Assistance	Regulatory guidance to be provided via OEMS	
(5) Information Sources	Informal stakeholder input	

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: There are no direct monetized costs to families associated with this exempt action</p> <p>Indirect Costs: There are no indirect monetized costs to families associated with this exempt action</p>	
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	<p>Direct Benefits: There are no direct monetized benefits to families associated with this exempt action</p> <p>Indirect Benefits: There are no indirect monetized benefits to families associated with this exempt action</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Improved public perception and clarity of fire/EMS vehicles in emergencies	
(4) Information Sources	Noted in stakeholder advocacy via the pursuit of this change.	

Impacts on Small Businesses

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

Table 4: Impact on Small Businesses

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct monetized costs to small businesses associated with this exempt action</p> <p>Indirect Costs: There are no indirect monetized costs to small businesses associated with this exempt action</p> <p>Direct Benefits: There are no direct monetized benefits to small businesses associated with this exempt action</p> <p>Indirect Benefits: There are no indirect monetized benefits to small businesses associated with this exempt action</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	None	

(4) Alternatives	None
(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
12VAC5-31-790	M/A	0	0	0	0
	D/A	0	0	0	0
	M/R:	0	1	0	+1
	D/R	3	0	0	0
Grand Total of Changes in Requirements:					(M/A):
					(D/A):
					(M/R): +1
					(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
12VAC5-31-790	Authorizes combination fire/EMS agencies to display fire department logos/ lettering larger than EMS logos/ lettering	Provides regulant with increased flexibility in terms of logo/ lettering sizes than previously afforded.

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

Title of Guidance Document	Original Word Count	New Word Count	Net Change in Word Count

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