

Office of Regulatory Management
Economic Review Form

Agency name	Manufactured Housing Board
Virginia Administrative Code (VAC) Chapter citation(s)	13 VAC 6-20
VAC Chapter title(s)	Manufactured Housing Licensing and Transaction Recovery Fund Regulations
Action title	Regulatory Reduction Consideration Pursuant to EO19
Date this document prepared	January 2025
Regulatory Stage (including Issuance of Guidance Documents)	Proposed Stage

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.

Agency Note: This regulatory action is intended to consider amendments to the Manufactured Housing Licensing Transaction Recovery Fund (MHLTRF) regulations that will accomplish the directives related to regulatory reduction proscribed in Executive Order 19 (2022). These reductions will be primarily achieved through structural changes that have no impact on the administration of the regulations but will benefit regulants by making it easier to understand the applicable requirements and by saving regulants time when complying with the requirements. The proposed changes also include the removal of provisions/requirements that are outdated and unenforceable.

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Describe the direct costs of this proposed change here. None Indirect Costs: Describe the indirect costs of the proposed change. The agency, and subsequently consumers, may incur minor indirect costs for the loss in fees collected in the Transaction Recovery Fund which carries out the consumer protection program, payment of claims for damages, and disciplinary actions against license holders. The agency does not anticipate the lost fee revenue will affect the solvency of the fund. Direct Benefits: Describe the direct benefits of this proposed change here. Regulants (manufacturers, dealers, brokers, and salespeople) with multiple locations may experience cost savings. A proposed change removes the requirement that regulants must pay licenses fees for separate locations. This change will save regulates additional fees and simplify the process of becoming licensed. Indirect Benefits: Describe the indirect benefits of the proposed change. None</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) Minimal</p>	<p>(b) Minimal</p>
<p>(3) Net Monetized Benefit</p>		
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>The primary benefit of these proposed changes is the consolidation of the Manufactured Housing Licensing and Transaction Recovery Fund regulations, removing duplicative regulations and repetitive requirements. These changes will result in time savings for regulants as the regulations will be easier to understand and they will save time complying with the licensing requirements. Additionally, the proposed changes remove some requirements which will lessen the administrative burden of regulants.</p>	
<p>(5) Information Sources</p>		

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Describe the direct costs of this proposed change here. Businesses with multiple locations will have to continue filing superfluous applications and paying duplicative fees for multiple locations of the same business. Indirect Costs: Describe the indirect costs of the proposed change.</p>	
---	--	--

	<p>None</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>None</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p> <p>None</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Minimal	(b) Minimal
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	<p>No changes to the regulations would keep in place the current lengthy and duplicative requirements. If the current regulations are retained, the direct cost to manufacturers, dealers, brokers, and salespeople would be wasted time/effort complying with overly complex and redundant requirements.</p> <p>Additionally, regulated entities continue performing outdated and unnecessary tasks, such as retaining advertising materials and providing parts and support for discontinued manufactured homes. The requirements add to the complexity of the current licensing requirements.</p>	
(5) Information Sources		

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

Agency Note: An alternative approach would be to, in addition to the current proposed changes, reduce fees for licensing manufactured home manufacturers, dealers, brokers, and salespeople.

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>This alternative approach would directly cost the Transaction Recovery Fund through decreased fee collection.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>This could potentially cost consumers by reducing the funding for the Transaction Recovery Fund to the point that it would have inadequate funding to cover a claim for recovery.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Regulated entities would benefit by having reduced fees related to licensing.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p> <p>None</p>
--	--

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	None	
(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)	Direct Costs: Describe the direct costs of this proposed change here. None Indirect Costs: Describe the indirect costs of the proposed change. None Direct Benefits: Describe the direct benefits of this proposed change here. None Indirect Benefits: Describe the indirect benefits of the proposed change. None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	None	
(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)	Direct Costs: Describe the direct costs of this proposed change here. None Indirect Costs: Describe the indirect costs of the proposed change. None Direct Benefits: Describe the direct benefits of this proposed change here. None Indirect Benefits: Describe the indirect benefits of the proposed change. None	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) None
(3) Other Costs & Benefits (Non-Monetized)	These proposed changes would prevent overly burdensome regulatory costs from being passed on to families in Virginia. As producers of manufactured houses save time/money from simpler and easy-to-understand licensing requirements, families will in-turn benefit from more affordable housing options.	
(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)	Direct Costs: Describe the direct costs of this proposed change here. None Indirect Costs: Describe the indirect costs of the proposed change. None Direct Benefits: Describe the direct benefits of this proposed change here. Small businesses with multiple locations will directly benefit, saving time and money through one combined license application. Indirect Benefits: Describe the indirect benefits of the proposed change. None	
--	---	--

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b) Minimal
(3) Other Costs & Benefits (Non-Monetized)	Small businesses that require manufactured housing licenses will save time as they navigate consolidated and streamlined requirements. All regulants will benefit directly from the removal of repetitive and unnecessary requirements that increase administrative burdens.	
(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
13VAC6-20	(M/A):	81	0	0	0
	(D/A):	41	0	3	(3)
	(M/R):	121	0	0	0
	(D/R):	160	0	42	(42)
Grand Total of Changes in Requirements:					(M/A): 0 (D/A): (3) (M/R): 0 (D/R): (42)

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)

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).