

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Department of Motor Vehicles
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	_ VAC __-__
<b>VAC Chapter title(s)</b>	
<b>Action title</b>	Amend DMV 309 guidance document to comply with HB 2221 (2025) and clarify the mandated court licensing ceremony requirement for minors.
<b>Date this document prepared</b>	5/5/2026
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Guidance Document Update

### **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><b>Direct Costs: Describe the direct costs of this proposed change here.</b> The proposed regulatory action does not introduce any changes that would present any direct costs.</p> <p><b>Indirect Costs: Describe the indirect costs of the proposed change.</b> The proposed regulatory action does not introduce any changes that would present any indirect costs.</p> <p><b>Direct Benefits: Describe the direct benefits of this proposed change here.</b> The proposed regulatory action does not introduce any changes that would present any direct benefits.</p> <p><b>Indirect Benefits: Describe the indirect benefits of the proposed change.</b> The proposed regulatory action does not introduce any changes that would present any indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	The proposed regulatory action permits a customer to provide a “Virginia Offender Information Form” issued within the previous 120 days as Proof of Identity, Proof of Social Security Number, and as Proof of Primary and Secondary Proof of Residency when applying for Driver Privilege Cards (DPCs) and Identification Privilege Cards (IPCs).	
(5) Information Sources	None.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p><b>Direct Costs: Describe the direct costs of this proposed change here.</b> Maintenance of the status quo would not present any direct costs.</p> <p><b>Indirect Costs: Describe the indirect costs of the proposed change.</b> Maintenance of the status quo would not present any indirect costs.</p> <p><b>Direct Benefits: Describe the direct benefits of this proposed change here.</b> Maintenance of the status quo would not present any direct benefits.</p> <p><b>Indirect Benefits: Describe the indirect benefits of the proposed change.</b> Maintenance of the status quo would not present any indirect benefits.</p>	
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	Maintenance of the status quo would result in the DMV 309 containing an incomplete list of eligible Proof of Identification, Proof of Social Security Number, and Primary and Secondary Proof of Residency documents. As such, customers may be unaware that the “Virginia Offender Information Form” could be used as a proof document when applying for a DPC or an IPC.	
(5) Information Sources	None.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Describe the direct costs of this proposed change here. As the sole alternative is the status quo, the alternative approach would not present any direct costs.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change. As the sole alternative is the status quo, the alternative approach would not present any indirect costs.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here. As the sole alternative is the status quo, the alternative approach would not present any direct benefits.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change. As the sole alternative is the status quo, the alternative approach would not present any indirect benefits.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	As discussed above, maintenance of the status quo would result in the DMV 309 containing an incomplete list of eligible Proof of Identification, Proof of Social Security Number, and Primary and Secondary Proof of Residency documents. As such, customers may be unaware that the “Virginia Offender Information Form” could be used as a proof document when applying for a DPC or an IPC.	

(5) Information Sources	
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**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><b>Direct Costs: Describe the direct costs of this proposed change here.</b> The proposed regulatory action does not introduce any changes that would present any direct costs to local partners.</p> <p><b>Indirect Costs: Describe the indirect costs of the proposed change.</b> The proposed regulatory action does not introduce any changes that would present any indirect costs to local partners.</p> <p><b>Direct Benefits: Describe the direct benefits of this proposed change here.</b> The proposed regulatory action does not introduce any changes that would present any direct benefits to local partners.</p> <p><b>Indirect Benefits: Describe the indirect benefits of the proposed change.</b> The proposed regulatory action does not introduce any changes that would present any indirect benefits to local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	There are no non-monetized costs or benefits specific to local partners associated with the proposed regulatory action.	
(4) Assistance	As the proposed regulatory action does not present any direct or indirect costs or benefits to local partners, no assistance is required.	
(5) Information Sources	None. The proposed regulatory action imposes no additional benefits or costs specific to local partners.	

**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**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p><b>Direct Costs: Describe the direct costs of this proposed change here.</b>                  The proposed regulatory action does not introduce any changes that would present any direct costs to families.  <b>Indirect Costs: Describe the indirect costs of the proposed change.</b>                  The proposed regulatory action does not introduce any changes that would present any indirect costs to families.  <b>Direct Benefits: Describe the direct benefits of this proposed change here.</b>                  The proposed regulatory action introduces changes that will make it easier for families with parents that have been released from incarceration to get an IPC or a DPC. This will increase access to transportation.  <b>Indirect Benefits: Describe the indirect benefits of the proposed change.</b>                  The proposed regulatory action introduces changes that will make it easier for families with parents that have been released from incarceration to obtain and maintain employment.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>
	<p>(a) \$0.00</p>	<p>(b) Too speculative to estimate at this time.</p>
<p>(3) Other Costs &amp; Benefits (Non-Monetized)</p>	<p>There are no non-monetized costs or benefits specific to families associated with the proposed regulatory action.</p>	
<p>(4) Information Sources</p>	<p>None. The proposed regulatory action imposes no additional benefits or costs specific to families associated with the proposed regulatory action.</p>	

**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 &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p><b>Direct Costs: Describe the direct costs of this proposed change here.</b>                  The proposed regulatory action does not introduce any changes that would present any direct costs to small businesses.  <b>Indirect Costs: Describe the indirect costs of the proposed change.</b>                  The proposed regulatory action does not introduce any changes that would present any indirect costs to small businesses.  <b>Direct Benefits: Describe the direct benefits of this proposed change here.</b></p>	
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	<p>The proposed regulatory action does not introduce any changes that would present any direct benefits to small businesses.</p> <p><b>Indirect Benefits: Describe the indirect benefits of the proposed change.</b></p> <p>The proposed regulatory action does not introduce any changes that would present any indirect benefits to small businesses.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	There are no non-monetized costs or benefits specific to small businesses associated with the proposed regulatory action.	
(4) Alternatives	As noted above, the sole alternative is maintenance of the status quo.	
(5) Information Sources	None. The proposed regulatory action imposes no additional benefits or costs specific to small businesses.	

**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
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	2	0	0	0
	(D/R):	9	0	0	0
<b>Grand Total of Changes in Requirements:</b>					(M/A):0
					(D/A):0
					(M/R):0
					(D/R):0

**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
DMV 309	The proposed regulatory action permits a customer to provide a “Virginia Offender Information Form” issued within the previous 120 days as Proof of	The proposed regulatory change decreases the regulatory burden on individuals because it adds another form of proof

	Identity, Proof of Social Security Number, and as Secondary Proof of Residency when applying for DPCs or IPCs.	customers may use for residency, Social Security Number, or identity when applying for a DPC or IPC.
DMV 309	The proposed regulatory action limits a customer to providing a “Virginia Offender Information Form” issued within the previous 120 days as Primary Proof of Residency when applying for DPCs or IPCs.	The proposed regulatory change increases the regulatory burden on individuals because it reduces the timeframe in which a Virginia Offender Information Form can be used as a Primary Proof of Residency from indefinitely to 120 days.

*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>
DMV 309	2570	2541	-39

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