

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Board for Asbestos, Lead, and Home Inspectors
Virginia Administrative Code (VAC) Chapter citation(s)	18VAC50-40
VAC Chapter title(s)	Home Inspector Licensing Regulations
Action title	Repeal of Guidance Documents 6247, 6248, 6266, 6663, 6709, and 6833.
Date this document prepared	June 27, 2025
Regulatory Stage (including Issuance of Guidance Documents)	Guidance Document (repeal)

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)

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>The Virginia Board for Asbestos, Lead, and Home Inspectors (the Board) has reviewed and voted to repeal guidance documents that are no longer necessary. Most of the guidance previously adopted by the Board has been incorporated into a final regulation adopted by the Board on November 21, 2024. The Board’s adopted final regulation, “2020-2021 General Review of Home Inspector Licensing Regulations” (Action 5658/ Stage 10813), is expected to become effective in October 2025. The repealed guidance is as follows:</p> <ol style="list-style-type: none"> 1. Guidance Document 6247: Home Inspector Applicant's Experience Verification of Inspections Completed. The guidance was adopted to aid Board staff and regulants in obtaining a proper log of each home inspection completed by an applicant to verify that the applicant completed the minimum number of inspections required to meet experience requirements for licensure. As a result of changes adopted by the Board in the final regulation. This guidance is obsolete. 2. Guidance Document 6248: NRS Specialty for Inspections Conducted by a Home Inspector on Homes Under Construction. The guidance provided that a home inspector must be licensed with a new residential structure (NRS) specialty to perform course of construction inspections on new residential structures. This guidance has been incorporated into the Board’s final regulation. 3. Guidance Document 6266: Home Inspector Regulations; Meaning of Describe. The guidance provided a definition for the term “describe” as it relates to the requirement for a home inspector to inspect the condition of and describe the composition and characteristics of readily accessible components and readily observable defects in a residential building or new residential structure. The meaning of the term “describe” has been incorporated into the Board’s final regulation. 4. Guidance Document 6663: Guidance Document regarding Inspections of Specific Components of a Residential Building. This guidance provided that an individual who does not hold a license as a home inspector and who is conducting inspections of a component system in a residential building is not considered to be performing a home inspection. This guidance has been incorporated into the Board’s final regulation. 5. Guidance Document 6709: Guidance Document Regarding CPE for Home Inspectors with the NRS Specialty. This guidance provided that a licensee who completes the initial NRS training program within one year of renewal will not be required to submit NRS CPE for that renewal. NRS CPE will be required for
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	<p>each subsequent renewal. This guidance has been incorporated into the Board’s final regulation.</p> <p>6. Guidance Document 6833: Meaning of "Direct Supervision" in 18VAC15-40-32 of the Home Inspector Licensing Regulations. The guidance provided a definition for the term “direct supervision” as it relates to the requirement for an applicant for a home inspector license to have completed home inspections under the direct supervision of a home inspector in order to meet experience requirements for licensure. The meaning of the term “direct supervision” has been incorporated into the Board’s final regulation.</p> <p>Direct Costs: There are no anticipated monetizable direct costs associated with this change.</p> <p>Indirect Costs: There are no anticipated monetizable indirect costs associated with this change.</p> <p>Direct Benefits: There are no anticipated monetizable direct benefits associated with this change.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits associated with this change.</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>Costs: There are no anticipated non-monetizable costs associated with the regulatory change.</p> <p>Benefits:</p> <ul style="list-style-type: none"> • The regulatory change will allow the Board to eliminate guidance documents that are no longer necessary. • Regulants and the public will benefit by having outdated or redundant information removed from the Virginia Regulatory Town Hall. 	
(5) Information Sources	Board staff	

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 new monetizable direct costs associated with maintaining the status quo.</p> <p>Indirect Costs: There are no new monetizable indirect costs associated with maintaining the status quo.</p> <p>Direct Benefits: There are no new monetizable direct benefits associated with maintaining the status quo.</p> <p>Indirect Benefits: There are no new monetizable indirect benefits associated with maintaining the status quo.</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>Costs: There are no new non-monetizable costs associated with maintaining the status quo.</p> <p>Benefits: There are no new non-monetizable benefits associated with maintaining the status quo.</p>	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Refer to Box #4	
(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)	There were no alternatives for the Board to consider in repealing these guidance documents.
(5) Information Sources	N/A

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: There are no anticipated monetizable direct costs to local partners.</p> <p>Indirect Costs: There are no anticipated monetizable indirect costs to local partners.</p> <p>Direct Benefits: There are no anticipated monetizable direct benefits to local partners.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits to local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated non-monetized costs or benefits to local partners.	
(4) Assistance	N/A	
(5) Information Sources	N/A	

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 anticipated monetizable direct costs to families.</p> <p>Indirect Costs: There are no anticipated monetizable indirect costs to families.</p> <p>Direct Benefits: There are no anticipated monetizable direct benefits to families.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits to families.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated non-monetizable costs or benefits to families.	
(4) Information Sources	N/A	

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 anticipated monetizable direct costs to small businesses.</p> <p>Indirect Costs: There are no anticipated monetizable indirect costs to small businesses.</p> <p>Direct Benefits: There are no anticipated monetizable direct benefits to small businesses.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits to small businesses.</p>	
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b)\$0
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated non-monetizable costs or benefits to small businesses.	
(4) Alternatives	N/A	
(5) Information Sources	N/A	

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
Guidance Document 6247	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	-6
Guidance Document 6248	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	1	-1
Guidance Document 6266	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
Guidance Document 6663	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
Guidance Document 6709	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	1	-1
Guidance Document 6833	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
Grand Total of Changes in Requirements:					(M/A): 0
					(D/A): 0
					(M/R): 0
					(D/R): -8

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
N/A	N/A	N/A	N/A	N/A

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
N/A	N/A	N/A

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

Title of Guidance Document	Original Word Count¹	New Word Count	Net Change in Word Count
Guidance Document 6247: Home Inspector Applicant's Experience Verification of Inspections Completed	Two pages (500 words)	Zero pages (0 words)	-500 words
Guidance Document 6248: NRS Specialty for Inspections Conducted by a Home Inspector on Homes Under Construction	Two pages (500 words)	Zero pages (0 words)	-500 words
Guidance Document 6266: Home Inspector Regulations; Meaning of Describe	Two pages (500 words)	Zero pages (0 words)	-500 words
Guidance Document 6663: Guidance Document regarding Inspections of Specific Components	Two pages (500 words)	Zero pages (0 words)	-500 words

of a Residential Building			
Guidance Document 6709: Guidance Document Regarding CPE for Home Inspectors with the NRS Specialty	Two pages (500 words)	Zero pages (0 words)	-500 words
Guidance Document 6833: Meaning of "Direct Supervision" in 18VAC15-40-32 of the Home Inspector Licensing Regulations	Three pages (750 words)	Zero pages (0 words)	-750 words
Total Change:			-3,250 words

1 – In its July 2023 Baseline Report, DPOR reported guidance document length in terms of pages. Per ORM guidance, one page is equivalent to 250 words.

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