

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12 VAC 5-481
VAC Chapter title(s)	Virginia Radiation Protection Regulations
Action title	Amend Guidance Document ORH-707
Date this document prepared	1/12/2023
Regulatory Stage (including Issuance of Guidance Documents)	Amend existing guidance document ORH-707

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>This action is to amend ORH-707 which contains information on the disposal or reclamation process for film processing chemicals used in certain x-ray machines. Proposed amendments are considered minor and would direct the reader to the Department of Environmental Quality’s regulations for the disposal of film processing chemicals instead of stating them in ORH-707.</p> <p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</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)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</p>	
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(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)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(5) Information Sources	12VAC5-481	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with this action.</p> <p>Indirect Costs: No indirect costs are associated with this action.</p> <p>Direct Benefits: No direct benefits are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</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)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(5) Information Sources	12VAC5-481	

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: No direct costs to local partners are associated with this action.</p> <p>Indirect Costs: No indirect costs to local partners are associated with this action.</p> <p>Direct Benefits: No direct benefits to local partners are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$0</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.</p>	
<p>(4) Assistance</p>	<p>No assistance to local partners is required as a result of the amendment of guidance document ORH-707.</p>	
<p>(5) Information Sources</p>	<p>12VAC5-481</p>	

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 & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: No direct costs to families are associated with this action.</p> <p>Indirect Costs: No indirect costs to families are associated with this action.</p> <p>Direct Benefits: No direct benefits to families are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</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)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(4) Information Sources	12VAC5-481	

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: No direct costs to small businesses are associated with this action.</p> <p>Indirect Costs: No direct costs to small businesses are associated with this action.</p> <p>Direct Benefits: No direct benefits to small businesses are associated with this action. No significant changes to the content of ORH-707 are proposed.</p> <p>Indirect Benefits: This action will update the guidance document ORH-707 to improve clarity and standardize the format of the document.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-monetized benefits include an improved guidance document that is easier for the regulated community to understand and incorporates a new standardized template for ORH guidance documents.	
(4) Alternatives	Alternatives to this action include 1) retaining ORH-707 as is, or 2) repealing ORH-707. The Office of Radiological Health believes ORH-707 could be improved through minor amendments to clarify the content and update the guidance document with the new ORH template. ORH-707 still contains information that is considered relevant to the regulated community and therefore should not be repealed.	

(5) Information Sources	12VAC5-481
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Changes to Number of Regulatory Requirements

For each individual VAC Chapter amended, repealed, or promulgated by this regulatory action, list (a) the initial requirement count, (b) the count of requirements that this regulatory package is adding, (c) the count of requirements that this regulatory package is reducing, (d) the net change in the number of requirements. This count should be based upon the text as written when this stage was presented for executive branch review. Five rows have been provided, add or delete rows as needed. In the last row, indicate the total number for each column.

Table 5: Total Number of Requirements

	Number of Requirements			
Chapter number	Initial Count	Additions	Subtractions	Net Change
ORH-707	0	0	0	0
TOTAL	0	0	0	0