

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Virginia Board for Asbestos, Lead, and Home Inspectors
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	18 VAC 15-30
<b>VAC Chapter title(s)</b>	Virginia Lead-Based Paint Activities Regulations
<b>Action title</b>	General Review of Virginia Lead-Based Paint Activities Regulations
<b>Date this document prepared</b>	March 27, 2025 (revised June 6, 2025)
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Proposed (Action 6367 / Stage 10711)

### **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 &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>This action largely proposes changes to (i) ensure the regulation complements current Virginia law and meets applicable federal requirements; (ii) make the regulation more organized, clear, and understandable; (iii) ensure the regulation provides minimal burdens on regulants while still protecting the public; and (iv) reduce regulatory requirements. Notable changes include:</p> <ol style="list-style-type: none"> <li>1. Reducing the “look back” period for applicants with prior misdemeanor convictions.</li> <li>2. No longer requiring the owner of an approved lead training program to re-apply for training program approval when there is a change of ownership in the training provider; training providers will only need to notify the Board of this change.</li> <li>3. Increasing the number of days, from ten (10) to thirty (30), that regulant has to notify the Board of any adverse action (i.e. criminal conviction or disciplinary action).</li> <li>4. Increasing the value from \$1,000 to \$2,000 under the definition of “financial interest,” which will reduce the burden of conflict of interest rules for lead contractors and persons who perform post-abatement clearance procedures on lead abatement projects.</li> </ol> <p>Direct Costs: There are no anticipated monetizable direct costs associated with the regulatory 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 the regulatory change.</p> <p>Indirect Benefits: There are no anticipated monetizable indirect benefits associated with this change.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$0</p>
<p>(3) Net Monetized Benefit</p>	<p>\$0</p>	

(4) Other Costs & Benefits (Non-Monetized)	<p>Costs: There are no anticipated non-monetizable costs associated with this change.</p> <p>Benefits:</p> <ul style="list-style-type: none"> <li>• Removing regulatory requirements that are unnecessary and burdensome.</li> <li>• Reducing the stringency of some requirements, including those related to disclosure of prior criminal history.</li> <li>• Enhanced protection of the public health, safety, and welfare.</li> <li>• Ensuring that the regulation is in compliance with federal requirements.</li> </ul>
(5) Information Sources	Agency 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 direct benefits associated with maintaining the status quo.</p> <p>Indirect Benefits: There are no 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)	There are no anticipated non-monetizable costs or benefits associated with maintaining the status quo.	
(5) Information Sources	Agency staff	

**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)	No less intrusive alternative approaches were identified in the development of this action.	
(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)	Refer to box #3	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated costs or benefits to local partners associated with this regulatory change.	
(4) Assistance	N/A	
(5) Information Sources	Agency staff.	

**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)	Refer to box #3	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	There are no anticipated costs or benefits to families associated with this regulatory change.	
(4) Information Sources	Agency staff	

**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)	Refer to box #3	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Lead contractor licenses are issued to firms. Some of these firms would likely qualify as small businesses as defined in § 2.2-4007.1 of the Code of Virginia. In addition, many firms that are approved by the Board to provide accredited training programs would likely qualify as small businesses as defined in § 2.2-4007.1 of the Code of Virginia. Lead worker, supervisor, inspector, risk assessor, and project designer licenses are issued to individuals. However, many licensed individuals may be	

	<p>owners or employees of business entities that fall within the meaning of small business as defined in § 2.2-4007.1 of the Code of Virginia.</p> <p>The costs and benefits association with this regulatory change are identified in Table 1(a). To the extent regulated parties fall within the meaning of “small business” this action would impact small businesses.</p>
(4) Alternatives	Refer to Table 1(c).
(5) Information Sources	Agency staff

**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*

<b>VAC Section(s) Involved*</b>	<b>Authority of Change</b>	<b>Initial Count</b>	<b>Additions</b>	<b>Subtractions</b>	<b>Total Net Change in Requirements</b>
30-41	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	1	-1
30-51	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	1	0	+1
30-52	(M/A):	1	3	1	+2
	(D/A):	5	6	5	+1
	(M/R):	24	26	24	+2
	(D/R):	26	13	20	-7
30-53	(M/A):	1	2	1	+1
	(D/A):	2	0	2	-2
	(M/R):	3	0	0	0
	(D/R):	26	5	20	-15
30-54	(M/A):	0	0	0	0
	(D/A):	6	3	3	0
	(M/R):	18	0	0	0
	(D/R):	16	2	7	-5
30-164	(M/A):	0	0	0	0
	(D/A):	1	1	1	0
	(M/R):	0	0	0	0
	(D/R):	1	1	1	0
30-165	(M/A):	0	0	0	0
	(D/A):	3	0	2	-2
	(M/R):	1	1	1	0
	(D/R):	8	5	8	-3
30-166	(M/A):	0	0	0	0
	(D/A):	3	0	2	-2
	(M/R):	14	0	0	0
	(D/R):	7	0	7	-7

30-167	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	3	3	3	0
30-332	(M/A):	0	0	0	0
	(D/A):	1	0	1	-1
	(M/R):	1	0	0	0
	(D/R):	0	0	0	0
30-334	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	1	-1
30-350	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	5	0	0	0
	(D/R):	2	0	1	-1
30-380	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	13	0	13	-13
	(D/R):	1	0	1	-1
30-390	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	6	0	0	0
	(D/R):	4	0	1	-1
30-400	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	10	0	0	0
	(D/R):	4	4	0	+4
30-420	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	57	0	0	0
	(D/R):	11	1	2	-1
30-435	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	3	0	+3
30-437	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	5	0	+5
	(D/R):	0	5	0	+5
	(M/A):	0	0	0	0

30-440	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	2	-2
30-450	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	10	1	0	+1
	(D/R):	1	0	1	-1
30-460	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	16	1	0	+1
	(D/R):	2	0	1	-1
30-470	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	11	1	0	+1
	(D/R):	2	1	2	-1
30-480	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	12	1	0	+1
	(D/R):	2	1	2	-1
30-490	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	8	0	0	0
	(D/R):	1	0	1	-1
30-500	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	5	3	0	+3
	(D/R):	1	0	0	0
30-510	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	5	0	0	0
	(D/R):	12	1	3	-2
30-760	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	1	-1
30-770	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	5	0	5	-5
30-780	(M/A):	0	0	0	0
	(D/A):	0	0	0	0

	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	5	0	5	-5
30-790	<b>(M/A):</b>	0	0	0	0
	<b>(D/A):</b>	0	0	0	0
	<b>(M/R):</b>	1	0	1	-1
	<b>(D/R):</b>	6	0	6	-6
30-795	<b>(M/A):</b>	0	0	0	0
	<b>(D/A):</b>	0	0	0	0
	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	0	8	0	+8
30-800	<b>(M/A):</b>	0	0	0	0
	<b>(D/A):</b>	0	0	0	0
	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	4	8	4	+4
30-810	<b>(M/A):</b>	1	0	1	-1
	<b>(D/A):</b>	3	0	2	-2
	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	21	1	20	-19
30-815	<b>(M/A):</b>	0	1	0	+1
	<b>(D/A):</b>	0	0	0	0
	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	0	11	0	+11
30-820	<b>(M/A):</b>	1	0	1	-1
	<b>(D/A):</b>	5	0	5	-5
	<b>(M/R):</b>	0	0	0	0
	<b>(D/R):</b>	5	0	5	-5
<b>Grand Total of Changes in Requirements:</b>					<b>(M/A): +2</b>
					<b>(D/A): -8</b>
					<b>(M/R): -5</b>
					<b>(D/R): -57</b>

**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)*

<b>VAC Section(s) Involved*</b>	<b>Description of Regulatory Requirement</b>	<b>Initial Cost</b>	<b>New Cost</b>	<b>Overall Cost Savings/Increases</b>
N/A	N/A	N/A	N/A	N/A

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

<b>VAC Section(s) Involved*</b>	<b>Description of Regulatory Change</b>	<b>Overview of How It Reduces or Increases Regulatory Burden</b>
30-52	The requirement for an applicant for an individual license to provide a physical address is replaced with a requirement for an applicant to provide a mailing address; and only provide a physical address when a post office box mailing address is provided.	<p>The change allows an applicant flexibility in the address that it may provide to the Board.</p> <p>This change reduces the stringency of the current requirement by 50%.</p> <p>This change applies to one D/R requirement in the section; resulting in a decrease of .5 D/R.</p>
30-52 30-53	<p>Criminal history disclosure provisions are revised to reduce the “look back” period for prior misdemeanor convictions that applicants for an individual license or lead contractor license must report on a license application. Applicants will be required to disclose all misdemeanor convictions (other than marijuana convictions and convictions involving environmental remediation activity) that occurred within three (3) years prior to application.</p> <p>Currently, applicants for an individual license are required to disclose all non-marijuana misdemeanor convictions. Applicants for a lead contractor license are required to disclose all misdemeanor convictions</p>	<p>This change is estimated to reduce the stringency of the current criminal history disclosure requirement by 50%.</p> <p>This change applies to one D/R requirement in 18VAC15-30-52 and one D/R requirement in 18VAC15-30-53; resulting in a decrease of 1 D/R.</p>

	involving lying, cheating, or stealing in their lifetime.	
30-53	<p>Criminal history disclosure provisions are revised to required applicants for a lead contractor license to disclose all misdemeanor convictions (other than marijuana convictions and convictions involving environmental remediation activity) that occurred within three (3) years prior to application.</p> <p>Currently, applicants for a lead contractor license are required to disclose all misdemeanor convictions involving lying, cheating, or stealing in their lifetime.</p>	<p>The change will marginally increase the stringency of the current requirement. The change should be offset by the reduction of the “look back” period for misdemeanor convictions.</p> <p>This change applies to one D/R requirement in the section.</p>
30-52	<p>Applicants for individual licenses who are seeking to qualify on the basis of completing a degree will be required to submit a transcript from the school where the degree was obtained.</p> <p>Currently, applicants must have the school complete and return a Board-provided verification form.</p>	<p>This change should make it easier for applicants to provide documentation of their degree.</p> <p>This change reduces the stringency of the current requirement by 50%.</p> <p>This change applies to one D/R requirement in the section; resulting in a decrease of .5 D/R.</p>
30-20 30-510	<p>The definition of the term “financial interest” is revised to increase from \$1,000 to \$2,000 the threshold value required to establish financial interest.</p> <p>This change will reduce the burden of conflict of interest rules for lead contractors. Lead contractors are prohibited from entering into a contract to</p>	<p>The change in the definition of “financial interest” reduces the stringency of conflict of interest rules by 50%.</p> <p>This change applies to two D/R requirements in the section; resulting in a decrease of 1 D/R.</p>

	<p>perform lead abatement if the lead inspection or project design is performed by individuals with a financial interest in the contractor, unless a written disclosure is made.</p> <p>The change will also reduce the burden of conflict of interest rules for persons who are licensed to perform post-abatement clearance procedures. These persons are prohibited from having a financial interest with the lead contractor that performs the abatement project.</p>	
30-800	<p>The timeframe for a regulant to report a disciplinary action taken by another jurisdiction against lead abatement license or lead training program accreditation is increased from 10 days to 30 days.</p>	<p>This change reduces the stringency of the current requirement by 33%.</p> <p>This change applies to one D/R requirement in the section; resulting in a decrease of -.33 D/R.</p>
<b>Total Change:</b>		<b>-3.33 D/R</b>

*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>
N/A	N/A	N/A	N/A

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