Office of Regulatory Management

Economic Review Form

Agency name	Common Interest Community Board
Virginia Administrative Code (VAC) Chapter citation(s)	18 VAC 48-70
VAC Chapter title(s)	Common Interest Community Ombudsman Regulations
Action title	CIC Ombudsman Regulations General Regulatory Review
Date this document prepared	September 12, 2024 (revised April 8, 2025, and May 9, 2025)
Regulatory Stage (including Issuance of Guidance Documents)	Final (Action 6283 / Stage 10745)

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)	1. This action revises provisions regarding delivery of notices to a complainant to provide that such notices must be hand delivered, mailed, or delivered by third-party courier, with proof of delivery. Currently, the regulation requires that such notices must be either hand delivered or mailed by registered or certified mail. 2. This action increases from seven (7) to 14 days the time period for an association to provide a complainant with written acknowledgment of receiving the complaint following the association's receipt of the complaint. 3. This action eliminates requirements that are not necessary to protect the health, safety, and welfare of the public, or effectively administer the program, and seeks to provide certain provisions in the regulation clearer, making the regulation easier to understand. Direct Costs: There are no anticipated monetizable direct costs associated with the regulatory change. Indirect Costs: There are no anticipated monetizable indirect costs associated with the regulatory change. Direct Benefits: There are no anticipated monetizable direct benefits associated with the change Indirect Benefits: There are no anticipated monetizable indirect benefits associated with the change.	
(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)	Costs: There are no new nonmonetizable costs associated with the change. Benefits: • The revised provisions regarding delivery of notices to a complainant are anticipated to reduce an administrative burden on associations.	

	• The increased time period for an association to provide a complainant with written acknowledgment of receiving the complaint following the association's receipt of the complaint is anticipated to reduce regulatory stringency. • Elimination of unnecessary regulatory requirements. • Clarification of certain provisions in the regulation.
(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)	Direct Costs: There are no new monetizable direct costs associated with maintaining the status quo. Indirect Costs: There are no new monetizable indirect costs associated with maintaining the status quo. Direct Benefits: There are no direct benefits associated with maintaining the status quo. Indirect Benefits: There are no indirect benefits associated with maintaining the status quo.	
(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 non-monetizable benefits or costs 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 direct or indirect costs to local partners. There are no anticipated direct or indirect benefits to local partners	
(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 direct or indirect costs to families. There are no anticipated direct or indirect benefits to families.	
(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)	(b)
(3) Other Costs & Benefits (Non-Monetized)	As noted in the ABD, CIC associations may be incorporated or non-incorporated entities which fall within the meaning of "small business" as defined in § 2.2-4007.1 of the Code of Virginia. The costs and benefits of this regulatory change are identified in Table 1(a). To the extent that any additional costs are assumed by a small business entities, this regulatory change would impact small businesses.	
(4) Alternatives	N/A	

(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

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
70-10	**(M/A):**	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	-1
	(D/R):	4	0	3	-3
70-50	**(M/A):**	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	4	1	0	+1
	(D/R):	26	2	2	0
70-90	**(M/A):**	0	0	0	0
	(D/A):	6	0	1	-1
	(M/R):	3	0	0	0
	(D/R):	6	0	0	0
70-100	**(M/A):**	1	0	0	0
	(D/A):	0	2	0	+2
	(M/R):	0	0	0	0
	(D/R):	0	1	0	+1
				Grand Total of Changes in Requirements:	**(M/A): 0**
					(D/A): +1
					(M/R): 0
					(D/R): -2

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
70-50	Provisions regarding delivery of notices to a complainant are revised to provide that such notices must be hand delivered, mailed, or delivered by third-party courier, with proof of delivery. Currently, the regulation requires that such notices must be either hand delivered or mailed by registered or certified mail.	This change provides flexibility to associations regarding delivery of notices. This change is anticipated to reduce an administrative burden on associations. Associations no longer are limited to either hand delivery or certified mailing of notices. Notices may be delivered by regular mail or third-party courier. This change reduces the stringency of the current requirements by 33%. This change affects three D/R requirements in the section; resulting in a decrease of .99 D/R.
70-50	The section is revised to increase from seven (7) to 14 days the time period for an association to provide a complainant with written acknowledgment of receiving the complaint following the association's receipt of the complaint.	This change reduces the stringency of the current requirement by 50%. This change affects one D/R requirement in the section; resulting in a decrease of .5 D/R.
Total Change:		**-1.49 D/R**

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**
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).