Office of Regulatory Management

Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12VAC5-215 and 12VAC5-216
VAC Chapter title(s)	Rules and Regulations Governing Health Data Reporting; Methodology to Measure Efficiency and Productivity of Health Care Institutions
Action title	Amend Regulations Following 2024 Periodic Review
Date this document prepared	7/8/2025
Regulatory Stage (including Issuance of Guidance Documents)	Fast Track

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)	Direct Costs: There are no direct monetized costs associated with this fast-track action. The proposed changes are being made to conform the provisions of these chapters to current industry practice and statutory changes enacted during the past 30 years. Indirect Costs: There are no indirect monetized costs associated with this fast-track action. The proposed changes are being made to conform the provisions of these chapters to current industry practice and statutory changes enacted during the past 30 years. Direct Benefits: There are no direct monetized benefits associated with this fast-track action. The proposed changes are being made to conform the provisions of these chapters to current industry practice and statutory changes enacted during the past 30 years. Indirect Benefits: There are no indirect monetized benefits associated with this fast-track action. The proposed changes are being made to conform the provisions of these chapters to current industry practice and statutory changes enacted during the past 30 years.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	The proposed changes will update the regulations to reflect the modern technologies and processes that are used to submit, collect, compile, analyze, evaluate, publish, and disseminate the data used to evaluate the efficiency and productivity of the Commonwealth's medical care facilities.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	There are no direct or indirect monetized benefits or costs associated with this change.

(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)	Other non-monetized costs associated with this action include difficulty interpreting the regulations due to outdated provisions and form.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: The changes made in this regulatory action are required to conform the provisions to current industry practice and statutory changes enacted during the past 30 years, and are not subject to consideration of alternative approaches. Indirect Costs: The changes made in this regulatory action are required to conform the provisions to current industry practice, and are not subject to consideration of alternative approaches. Direct Benefits: The changes made in this regulatory action are required to conform the provisions to current industry practice, and are not subject to consideration of alternative approaches. Indirect Benefits: The changes made in this regulatory action are required to conform the provisions to current industry practice, and are not subject to consideration of alternative approaches.	
(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)	N/A	

(5) Information Sources	

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)	Direct Costs: There are no direct monetized costs to local partners as a result of this fast track action. Indirect Costs: There are no indirect monetized costs to local partners as a result of this fast track action. Direct Benefits: There are no direct monetized benefits to local partners as a result of this fast track action. Indirect Benefits: There are no indirect monetized benefits to local partners as a result of this fast track action.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(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 &	Direct Costs: There are no direct monetized costs to families as a result of this fast track action.

Benefits (Monetized)	Indirect Costs: There are no indirect monetized costs to families as a result of this fast track action. Direct Benefits: There are no direct monetized benefits to families as a result of this fast track action. Indirect Benefits: There are no indirect monetized benefits to families as a result of this fast track action.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	N/A	

<u>Impacts on Small Businesses</u>

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)	Direct Costs: There are no direct monetized costs to small businesses as a result of this fast track action. Indirect Costs: There are no indirect monetized costs to small businesses as a result of this fast track action. Direct Benefits: There are no direct monetized benefits to small businesses as a result of this fast track action. Indirect Benefits: There are no indirect monetized benefits to small businesses as a result of this fast track action.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A

(3) Other Costs & Benefits (Non-Monetized)	N/A
(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**
12VAC5-215-10	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-215-15	**(M/A):**				
	(D/A):				
	(M/R):		**+9**		**+9**
	(D/R):				
12VAC5-215-20	**(M/A):**	**2**		**-2**	**-2**
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-215-30	**(M/A):**	**4**		**-4**	**-4**
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):				
12VAC5-215-35	**(M/A):**				

	(D/A):				
	(M/R):		**+1**		**+1**
	(D/R):		**+1**		**+1**
12VAC5-215-40	**(M/A):**	**1**		**-1**	**-1**
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-215-45	**(M/A):**				
	(D/A):		**+1**		**+1**
	(M/R):				
	(D/R):		**+1**		**+1**
12VAC5-215-50	**(M/A):**				
	(D/A):	**1**	**+1**		**+1**
	(M/R):	**1**	**+1**		**+1**
	(D/R):	**13**		**-1**	**-1**
12VAC5-215-55	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):		**+3**		**+3**
12VAC5-215-60	**(M/A):**				
	(D/A):				
	(M/R):	**1**		**-1**	**-1**
	(D/R):	**4**		**-4**	**-4**
12VAC5-215-65	**(M/A):**		**+1**		**+1**
	(D/A):		**+1**		**+1**
	(M/R):		**+1**		**+1**
	(D/R):		**+2**		**+2**
12VAC5-215-70	**(M/A):**				
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):	**7**		**-7**	**-7**
12VAC5-215-75	**(M/A):**				
	(D/A):		**+2**		**+2**

	(M/R):				
	(D/R):		**+2**		**+2**
12VAC5-215-80	**(M/A):**				
	(D/A):	**2**		**-2**	**-2**
	(M/R):				
	(D/R):	**11**		**-11**	**-11**
12VAC5-215-85	**(M/A):**				
	(D/A):		**+3**		**+3**
	(M/R):				
	(D/R):		**+2**		**+2**
12VAC5-215-90	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**2**		**-2**	**-2**
12VAC5-215-95	**(M/A):**				
	(D/A):		**+2**		**+2**
	(M/R):				
	(D/R):		**+2**		**+2**
12VAC5-215-100	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**1**		**-1**	**-1**
12VAC5-215-105	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):		**+4**		**+4**
12VAC5-215-110	**(M/A):**				
	(D/A):				
	(M/R):				**-1**
	(D/R):	**1**		**-1**	**-1**
12VAC5-215-115	**(M/A):**				
	(D/A):				
	(M/R):				

	(D/R):		**+8**		**+8**
12VAC5-215-120	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**2**		**-2**	**-2**
12VAC5-215-125	**(M/A):**		**+1**		**+1**
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-215-130	**(M/A):**				
	(D/A):				
	(M/R):	**1**		**-1**	**-1**
	(D/R):				
12VAC5-215-135	**(M/A):**				
	(D/A):				
	(M/R):		**+1**		**+1**
	(D/R):		**+1**		**+1**
12VAC5-215-140	**(M/A):**				
	(D/A):	**3**		**-3**	**-3**
	(M/R):	**1**		**-1**	**-1**
	(D/R):	**1**		**-1**	**-1**
12VAC5-215-150	**(M/A):**				
	(D/A):	**2**		**-2**	**-2**
	(M/R):				
	(D/R):	**3**		**-3**	**-3**
12VAC5-215-160	**(M/A):**				
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):	**6**		**-6**	**-6**
12VAC5-215-170	**(M/A):**				
	(D/A):	**2**		**-2**	**-2**
	(M/R):				
	(D/R):				

12VAC5-215-180	**(M/A):**				
	(D/A):	**3**		**-3**	**-3**
	(M/R):				
	(D/R):				
12VAC5-215-190	**(M/A):**				
	(D/A):	**7**		**-7**	**-7**
	(M/R):				
	(D/R):				
12VAC5-215-200	**(M/A):**				
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):				
12VAC5-215-210	**(M/A):**	**2**		**-2**	**-2**
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-215 FORMS	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-216-10	**(M/A):**	**1**		**-1**	**-1**
	(D/A):				
	(M/R):				
	(D/R):				
12VAC5-216-20	**(M/A):**				
	(D/A):	**2**		**-2**	**-2**
	(M/R):	**2**		**-2**	**-2**
	(D/R):				
12VAC5-216-30	**(M/A):**	**2**		**-2**	**-2**
	(D/A):				
	(M/R):	**2**		**-2**	**-2**
	(D/R):				
12VAC5-216-40	**(M/A):**				

	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):				
12VAC5-216-50	**(M/A):**				
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):	**5**		**-5**	**-5**
12VAC5-216-60	**(M/A):**	**1**		**-1**	**-1**
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):	**3**		**-3**	**-3**
12VAC5-216-70	**(M/A):**	**1**		**-1**	**-1**
	(D/A):	**1**		**-1**	**-1**
	(M/R):				
	(D/R):				
12VAC5-216-80	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**1**		**-1**	**-1**
12VAC5-216-90	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**9**		**-9**	**-9**
12VAC5-216-100	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):	**6**		**-6**	**-6**
12VAC5-216 FORMS	**(M/A):**				
	(D/A):				
	(M/R):				
	(D/R):				
				Grand Total of Changes in Requirements:	**(M/A): -12**
					(D/A): -19
					(M/R): +5

	(D/R): -37

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
12VAC5-215-160	Subsection C requires medical care facilities to pay a late charge to the Board for late submission of the schedule of charges.	$50.00	$0.00	$50.00 per late submission.
12VAC5-215-160	Subsection D requires medical care facilities to pay a late charge to the Board for late submission of the commercial diversification survey.	$25.00 per working day.	$0.00	$25.00 per working day for each late submission of the commercial diversification survey.
12VAC5-215-160	Subsection E requires medical care facilities to pay a late charge to the Board for late submission of the survey of rates.	$25.00 per working day.	$0.00	$25.00 per working day for each late submission of the survey of rates.
12VAC5-215-160	Subsection F requires medical care facilities to pay a late charge	$25.00 per working day.	$0.00	$25.00 per working day for each late

	to the Board for late submission of IRS Form 990.			submission of IRS Form 990.

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**
12VAC5-215-60	Removes the requirement that medical care facilities submit an annual survey of charges for evaluation.	The requirement to submit the information is removed as the survey of charges is no longer conducted. Financial and utilization data provided for room rates is submitted by medical care facilities electronically in the annual historical filing.
12VAC5-215-70	Removes the requirement that medical care facilities submit an annual survey of rates for evaluation.	The requirement to submit the information is removed as the survey of rates is no longer conducted. Financial and utilization data provided for charges imposed by medical care facilities are now submitted electronically in the annual historical filing.
12VAC5-215-80	Removes the requirement that hospitals, or any corporation that controls a hospital, respond to a Board survey determining the extent of each entity’s commercial diversification.	The requirement that hospitals or corporations that control a hospital respond to a commercial diversification survey is removed as the survey is no longer conducted.
12VAC5-215-90	Removes the requirement that respondents to the commercial diversification survey also include information related to affiliates that have a 25% or greater interest in a hospital.	The requirement that respondents to the commercial diversification survey also submit information regarding affiliates that have a 25% or greater interest in a hospital is removed as the commercial diversification survey is no longer conducted.

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**

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