

Cost of Renumbering Code of Virginia by State Agency

1	B	G	H	I	J	K	M	N	O	P	Q	R	T	Z
2	Agency	ANNUAL CODE SECTION CHANGES					ONE-TIME RENUMBERING OF ENTIRE CODE							Cost - Percent Change
3		Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	TOTAL ANNUAL COSTS	Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	ESTIMATED ONE-TIME RENUMBERING COSTS	
3	Capitol Police, Division of	8	\$750	\$0	\$2,500	\$0	\$3,250	40	\$1,750	\$0	\$5,000	\$0	\$6,750	108%
4	Accountancy, Board of	8	\$0	\$0	\$0	\$0	\$0	40	\$1,000	\$2,500	\$0	\$0	\$3,500	
5	Accounts, Department of	1	\$0	\$0	\$0	\$0	\$0	20	\$1,000	\$1,000	\$0	\$0	\$2,000	
6	Aging and Rehabilitative Services, Department for							250	\$0	\$0	\$2,000		\$2,000	
7	Agriculture and Consumer Services, Department of	8	\$2,500	\$0	\$0	\$0	\$2,500	265	\$17,140	\$1,627	\$3,415	\$2,500	\$24,682	887%
8	Assistive Technology Loan Fund Authority							5	\$200	\$0	\$0	\$0	\$200	
9	Attorney General's Office	40	\$0	\$1,000	\$200	\$0	\$1,200	150	\$1,750	\$4,250	\$5,500	\$1,000	\$12,500	942%
10	Auditor of Public Accounts	4	\$500	\$0	\$0	\$0	\$500	6	\$750	\$0	\$0	\$0	\$750	50%
11	Aviation, Department of	0	\$66,350	\$100	\$0	\$0	\$66,450	44	\$66,350	\$100	\$0	\$0	\$66,450	0%
12	Comprehensive Services	8	\$0	\$0	\$0	\$0	\$0	40	\$0	\$2,800	\$0	\$0	\$2,800	
13	Corrections, Department of	60						1,000	\$150,000				\$150,000	
14	Council on Virginia's Future	0	\$0	\$0	\$0	\$0	\$0	6	\$0	\$0	\$0	\$0	\$0	
15	Deaf and Hard of Hearing, Dept. of	5		Minimal				5						
16	Education, Dept. of **													
17	Elections, State Board of	722	\$122,652	\$170	\$51,684		\$174,506	1,450	\$174,512	\$850	\$0		\$175,362	0%
18	Emergency Management, Department of		\$0	\$0	\$0	\$0	\$0	175	\$8,750		\$300		\$9,050	
19	Employment Commission, Virginia						\$0		\$350,000	\$800,000	\$200,000		\$1,350,000	
20	Environmental Quality, Department of	180	\$0	\$0	\$0	\$0	\$0	10,770	\$15,000	\$800		\$3,200	\$19,000	
21	Fire Programs, Dept. of	0	\$0	\$0	\$0	\$0	\$0	30	\$2,000	\$0	\$0	\$0	\$2,000	
22	Forensic Science, Department of	10	\$19,000	\$2,000	\$1,000		\$22,000	40	\$19,000	\$2,000	\$1,000	\$251,000	\$273,000	1141%
23	Forestry, Department of	0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0	\$0	\$0	\$0	

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25		Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	TOTAL ANNUAL COSTS	Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	ESTIMATED ONE-TIME RENUMBERING COSTS		
26	General Services, Department of	1218	\$49,154	\$1,139	\$656		\$50,949	2,672	\$98,825	\$2,103	\$16,500		\$117,428	130%	
27	Health Professions, Dept. of	150	\$5,000	\$2,000	\$5,000		\$12,000	1,500	\$50,000	\$2,000	\$10,000		\$62,000	417%	
28	Historic Resources, Dept. of	160	\$0	\$0	\$0		\$0	160	\$0	\$0	\$0	\$0	\$0		
29	House of Delegates	0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0	\$0	\$0	\$0		
30	Housing and Community Development, Dept. of	50	\$1,240	\$0	\$0	\$0	\$1,240	345	\$10,970	\$100	\$0	\$0	\$11,070	793%	
31	Housing Development Authority, VA		Minimal						Minimal						
32	Joint Legislative Audit and Review Commission	0	\$0	\$0	\$0	\$0	\$0	16	\$0	\$0	\$0	\$0	\$0		
33	Library of Virginia	0	\$0	\$0	\$0	\$0	\$0	150	\$1,000	\$5,000	\$5,000	\$0	\$11,000		
34	Marine Resources Commission	25	\$13,000	\$0	\$0	\$0	\$13,000	200	\$23,000	\$500	\$0	\$13,500	\$37,000	185%	
35	Medical Assistance Services, Dept. of	156	\$4,000	\$1,445	\$514	\$0	\$5,959	655	\$37,339	\$2,829	\$2,140	\$0	\$42,308	610%	
36	Mines, Minerals and Energy, Dept. of	200	\$40,000	\$1,500	\$0	\$0	\$41,500	1,500	\$70,000	\$5,000	\$10,000		\$85,000	105%	
37	Motor Vehicle Dealer Board	20	\$500	\$200	\$4,000		\$4,700	20	\$500	\$200	\$4,000		\$4,700	0%	
38	Motor Vehicles, Department of**	See attachment							14,398	See attachment			\$2,294,176	\$2,294,176	
39	People with Disabilities, VA Board for	2	\$200	\$0	\$0	\$0	\$200	3	\$500	\$0	\$0	\$0	\$500	150%	
40	Planning and Budget, Dept. of**		varies									\$10,000	\$10,000		
41	Professional & Occupational Regulation, Dept of	570	\$0	\$0	\$0	\$0	\$0	2,285	\$0	\$0	\$0	\$0	\$0		
42	Rail and Public Transportation, Dept. of	25	\$0	\$0	\$0	\$0	\$0	250	\$10,000	\$10,000	\$0	\$0	\$20,000		
43	Science Museum of Virginia	0	\$0	\$0	\$0	\$0	\$0	10	\$100	\$0	\$0	\$0	\$100		
44	Senate of Virginia	72	\$0	\$0	\$0	\$0	\$0	72	\$0	\$0	\$0	\$0	\$0		

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46		Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	TOTAL ANNUAL COSTS	Total Staff Hours	Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Updating computer software, databases, and websites, etc.	Training or education for staff, contractors, or public	Other associated costs	ESTIMATED ONE-TIME RENUMBERING COSTS	
47	Social Services, Dept. of	50	\$20,000	\$10,500	\$100,000		\$130,500	900	\$96,700	\$6,000			\$102,700	-21%
48	State Corporation Comm	100	\$3,000	\$7,500	\$2,000		\$12,500	4,200	\$35,000	\$453,000	\$6,000		\$494,000	3852%
49	Supreme Court of Virginia		\$189,900	\$755,100	\$78,950	\$550	\$1,024,500		\$1,014,800	\$2,916,100	\$183,400	\$26,800	\$4,141,100	304%
50	Taxation, Dept. of			Minimal						Minimal				
51	Transportation, Dept. of	3600	\$60,775	\$1,600	\$250	\$159,810	\$222,435	10,030	\$286,852	\$165,900	\$72,400	\$278,350	\$803,502	261%
52	University of Mary Washington	80	\$625	\$1,565	\$300		\$2,490	400	\$3,125	\$6,250	\$3,125		\$12,500	402%
53	Veterans Services, Dept. of	10	\$0	\$0	\$0	\$0	\$0	100	\$5,000	\$1,000	\$0	\$0	\$6,000	
54	Virginia Alcohol Safety Action Program						\$0	40	\$30,000	\$5,000	\$10,000		\$45,000	
55	Virginia Comm. for the Arts	0	\$1,000	\$100	\$100	\$100	\$1,300							
56	Virginia Economic Development Partnership Authority	5	\$0	\$0	\$0	\$0	\$0	15	\$100	\$1,000	\$1,000	\$0	\$2,100	
57	Virginia Indigent Defense Commission	50	\$0	\$0	\$0		\$0	100	\$1,000	\$5,000	\$0		\$6,000	
58	Virginia Lottery	8	\$0	\$0	\$0	\$0	\$0	8	\$0	\$0	\$0	\$0	\$0	
59	Virginia Military Institute						\$0	20		\$1,000	\$100		\$1,100	
60	Virginia Parole Board	0	\$0	\$0	\$0	\$0	\$0	20	\$0	\$0	\$0	\$0	\$0	
61	Virginia Retirement System	297	\$6,000	\$2,000	\$0	\$0	\$8,000	400	\$8,000	\$2,000	\$0	\$0	\$10,000	25%
62	Virginia State Bar	0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0	\$0	\$0	\$0	
63	Virginia State Police	200	\$75,000	\$200,000	\$72,000	\$10,000	\$357,000	2,000	\$200,000	\$4,000,000	\$200,000	\$20,000	\$4,420,000	1138%
64	Virginia Tech													
65	Virginia Tourism Authority	0	\$0	\$0	\$0	\$0	\$0	0	\$0	\$0	\$0	\$0	\$0	
66	Virginia Workers' Compensation Commission	4	\$30,000				\$30,000	566	\$40,000				\$40,000	33%
67	GRAND TOTALS	8,106	\$711,146	\$987,919	\$319,154	\$170,460	\$2,188,679	57,371	\$2,832,013	\$8,405,909	\$740,880	\$2,900,526	\$14,879,328	580%

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
Agriculture and Consumer Services, Department of		Personnel time	There are numerous Code references in contract terms and conditions, insurance templates and other forms we use. If we had to modify existing contracts, that would be a huge undertaking.
Attorney General, Office of the	Cost of Supplements	CLE Training; benchmarks printed; form letters; complaint letters; consumer protection web pages; cost of new sets	Training will need to be available to all attorneys & legal support staff; assist agencies with new information; update all forms, guidance documents and regulations; extended research on various matters that are impacted by changes; initial review of all revised code sections and noting new location of key statutes. Comments from Civil Division - Sexually Violent Predator - Civil Commitment Section: Due to prior challenges to the SVP Act (§37.2-900 et seq.), including whether the process is civil or criminal, the SVP Act should remain in the Civil portion of the Code, preferably in the DBHDS Title.
Aviation, Dept of			Please be aware these estimates were developed using several assumptions that could alter the scale or magnitude of the responses. For example, hours were requested in a spot on the form, and you need to know that hours were used by us in the calculations for costs. Thank you and please let us know should you have any questions.
Capitol Police, Division of			Potential software product price increases from vendors who are impacted.

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
Comprehensive Services	Costs are absorbed into routine administrative operations		
Corrections, Dept of	It would depend on how much changes and how major the changes are. For minor changes the costs would be minimal as they would be made as the directives were amended yearly. For changes that would require notification to offenders, there could be large costs for copying and training. In an agency as large and diverse as the Department of Corrections, it is nearly impossible to predict costs for these types of changes.	Again, it is very difficult for us to anticipate the costs of updating the more than 300 policies and directives controlled by the department. There are also many local directives and policies that would need to be amended, not to mention signage at out many institutions.	Every facility used to have its own set of the COV as did every P&P office. A few years ago we stopped updating these sets as facilities and offices can use on line resources for what they need. Further offenders have Code access through West and no longer have the bound volumes. I know my answers have not been very specific, but unfortunately with an Agency as large as DOC, it was very difficult to get a handle on these issues. It could be very daunting for us to update the many policies, procedures and directives for which we are responsible. Also, updating offenders on the new numbering could also be a challenge.
Deaf and Hard of Hearing, Department of	Costs to amend/print forms, etc., not applicable. Other costs are minimal.	Would not anticipate significant costs.	As a small agency with limited applicable Code sections, VDDHH does not anticipate significant impact from this.
Education, Dept of	It is difficult to determine the cost of simply renumbering Code sections, but the cost would probably be minimal. All of our forms, brochures, manuals, and other documents are currently online, and we typically use a hyperlink when we cite the Code. After each session, we review every bill passed by the General Assembly affecting K-12 to determine what regulations, guidance documents, or other materials need to be revised. Our focus is	It is extremely difficult to quantify the cost of simply renumbering changes in the Code. We update our regulations, guidance documents, and other information each year to reflect all applicable actions of the General Assembly. Any changes in the numbering of a particular Code section are a minor part of that effort. All of our documents are online, and we no longer provide printed copies to school divisions or the public. When we reference a Code section, we typically use a hyperlink to	The issue isn't renumbering sections of the Code; it's whether or not the Code Commission will make any changes in the wording of the Code. There are a number of sections of Title 22.1 that could be updated or, in some cases, repealed.

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
	primarily on how the statute itself has been revised.	ensure that the reader always has access to the current statute.	
Environmental Quality, Dept of	Our current costs are negligible as there are relatively few Code section changes in any given year.	With the increased use of the internet and electronic submittal of information, the above costs have continued to decline over the years. However, with a complete recodification, it is expected that our training and certification program will incur costs of reprinting certain manuals. Also, at least one program will have to submit a revised program authorization that will include some minor software costs and public notice costs.	(1) When drafting the legislation, an enactment clause making the regulatory revisions exempt from Article 2 of the Administrative Process Act is requested. While there is a provision of the APA which exempts changes necessary to conform to state statutory changes currently in existence (2.2-4006 A 4 a), there have been recent interpretations that if the regulatory action is not submitted for publication within 90 days of the effective date of the statute, then the exemption is no longer usable. For those agencies with a lot of regulations, 90 days may be insufficient to accomplish the necessary amendments. An exemption through the enactment clause would resolve that issue and could include a deadline of 6 months if there is a concern about the process of amending the regulations taking too long. (2) It would also be helpful if those that are developing the statutory text create a crosswalk of section numbers as they go along.
Fire Programs, Dept of	Thus far, the Dept of Fire Programs has not been impacted by a Code repeal/change of section numbers.	The Agency will be required to re-print brochures and manuals if our code section is re-numbered.	

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
Forensic Science, Department of		<p>The instructions and preprinted forms for certain kits distributed by DFS to its stakeholders contain Code references. Because these items are typically used for evidential purposes, the estimate assumes replacement kits must be immediately ordered and distributed. The yearly cost to order new kits is as follows: DNA Buccal Swab Kits: \$144,500; Physical Evidence Recovery Kits: \$30,000; Marijuana Field Test Kits: \$15,000; Blood specimen kits relating to implied consent DUI blood draws (including evidential Certificates of Blood Withdrawal): \$30,000; Primer Residue Kits: \$10,000; Various OCME Kits: \$20,000</p> <p>The Department also estimates a group of high level staff will be required to review and edit numerous manuals and regulations. The "associated costs" estimate also includes this personnel cost based on the members of this group's hourly rate. If rather than replacing the kits listed above the instructions must be replaced, DFS estimates the manpower costs will be significantly higher.</p>	
Forestry, Dept of	We do not track costs, but anticipate the costs are minimal in the Department of Forestry.		
General Services, Dept of	Staff salaries and training materials	Salaries, actual updates to online and hard copy materials; training and educating staff, contractors and public; guidance document updates	

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
Historic Resources, Dept of	Depends on whether or not agency has to go through the full APA process just to update Code references.		The costs to our agency would largely consist of staff time to make changes to documents such as strategic plan, comprehensive plan, COOP, @ 30 guidance documents, 6 regulations and agency website.
Housing and Community Development, Dept of	Note: Costs in this section, including the \$1,240 entry in the first question, primarily reflect the staff time required by the Commission on Local Government to complete its annual update of materials such as the Catalog of State and Federal Mandates on Local Governments.	As with the previous entries, most of the costs under this heading relate to the anticipated staff effort required to review and update the hundreds of Code references included in the Catalog of State and Federal Mandates on Local Governments. Less than five percent of the amount and staff time reflect changes that might be necessitated in materials related to the administration of the Enterprise Zone program or the state's building regulations. A review of IT functions and web site materials found relatively few COV references. Thus, the agency does not anticipate major costs within this budget area solely because of COV renumbering.	The Enterprise Zone program is currently split between two Chapters of Title 59.1. It would be helpful both to the agency and its customers if they could be consolidated as part of a broader re-codification effort. The Commission on Local Government noted that the Catalog of State and Federal Mandates currently contains almost 650 entries, each of which includes a statutory or regulatory reference (at least 443 to the COV) that would have to be modified to reflect any new numbering scheme. The Catalog is updated annually, requiring significant data entry by Commission staff as well as cooperating agencies to accommodate the new COV references. DHCD administers the state's building and fire safety codes; however, these extensive regulations are updated on a three-year cycle. The latest revisions will take effect later this year. Depending on the actual timing of the re-codification, most COV references included within them could be updated as part of the triennial code change cycle without incurring costs beyond those already budgeted for this process.

AGENCY COMMENTS

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Housing Development Authority, Virginia	All costs and staff time are minimal.	All costs and staff time are estimated to be minimal.	
Joint Legislative Audit and Review Commission			Annual updates to the Code are included in regular updates of our publications and website, so do not pose an additional cost to JLARC. A full renumbering of the Code also would not result in additional costs because existing staff would implement the changes. However, we anticipate that a full renumbering of the Code would take approximately 16 staff hours.
Library of Virginia	n/a	Cost of staff time to update more than 1300 entries in Infolinx, our box management system for records management, and ALEPH, our catalog, plus training staff and system users.	
Marine Resources Commission		Update/re-distribute agency regulations that reference code section numbers	In regards to #3 costs, if the code is renumbered we would plan to print 250 code books (\$23,000) and also update with new code references, print and re-distribute 250 sets of our agency regulations (\$13,500).
Motor Vehicle Dealer Board	The above are estimates.	Above are estimates.	
Motor Vehicles, Department of	SEE SEPARATE ATTACHMENT	SEE SEPARATE ATTACHMENT	SEE SEPARATE ATTACHMENT

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
People with Disabilities, Virginia Board for	No other associated cost.	No other associated cost.	Nothing from this agency as we are a supervisory board and the only code change in the last few years has been the consolidation of the Dept. of Rehabilitative Services with the Dept. of Aging making our supervisory board 39 and not 40.
Planning and Budget, Dept of	For the Economic and Regulatory Analysis Division (ERAD) of the Virginia Department of Planning and Budget (DPB), this costs varies every year depending on whether there is any new legislation affecting the rulemaking process and the Virginia Regulatory Town Hall website as a result.	\$10K minimum. This is just for ERAD. I have asked other divisions in DPB about their costs associated with this project but have not heard back as of 4/11/14. The \$10K would be a sunk cost as we would not hire additional staff. The following is the estimated number of hours that would be associated with each task: Town Hall forms - 5 hours, updating Town Hall User Manual on website - 20 hours, other changes to Town Hall website - 50 hours, staff training - 5 hours	<p>We would like to offer some comments on the potential impact of this project across state agencies.</p> <ol style="list-style-type: none"> 1. The Regulatory Town Hall website contains nearly 300 regulatory actions on the regulatory docket. If the COV is renumbered, all regulatory proposals in progress (the agency background statements and, in most cases, the regulatory text) would need to be updated by the promulgating agency and in a relatively short time frame. 2. All the regulations on the Town Hall contain information about legal authority. This information would need to be updated on the website. 3. Confusion borne by this project. Renumbering the entire COV would make it in some cases exceedingly difficult for people to make sense of prior regulatory actions on the Town Hall because the COV citations would be out of date. 4. The Town Hall contains 3,225 guidance documents of state agencies. Most of these guidance documents reference Code citations many times and would need to be updated.

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			<p>Many guidance documents are hundreds of pages long. Updating COV citations in these guidance documents could take thousands of hours of staff time of most executive branch state agencies to update.</p> <p>5. Agency forms pertaining to compliance with state regulations that reference the Code of Virginia would need to be updated. Many of these forms may be preprinted in hard copy and will need to be reprinted.</p> <p>6. All state regulations in Virginia contain numerous references to the COV and would need to be updated. The Registrar of Regulations would have more and better information about this subject but certainly the impact on the Virginia Administrative Code would be considerable. Thanks for asking for our input!!!</p>
Rail and Public Transportation		costs are for staff time	A renumbering will not cause much of an issue; a rewrite is a different matter. We just went through a rewrite this year.
Senate of Virginia	We don't maintain this info.	Main cost would be purchasing new code books. Based on current cost of a set it would be about \$50,000 for this agency.	
Social Services, Dept of	The Department does not have a central budget reserved for such costs. Two large divisions within VDSS provided estimated costs for this portion of the survey.	Responses to this portion of the survey are based on responses from four large divisions with VDSS, including Finance and Child Support. It includes updating MOAs and MOU's, regulations, guidance documents, state plans, updating web information, etc.	Overall without a central budget for costs associated with Code changes, it was difficult provide overall estimated agency costs. Our survey response provides a snap shot of potential costs for some key divisions. VDSS has over 70 guidance documents listed on the

AGENCY COMMENTS

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			<p>Regulatory Town Hall that include references and in many cases, live links to the Code of Virginia throughout. Simple text references to the Code could be changed as these documents are updated on their regular cycles. Live links would need to be updated sooner. However, this would seem to be dependent upon DLAS updating the Code on the LIS first, in order for the links to function.</p> <p>Forms - VDSS maintains over 200 forms for use by local departments and state staff, many of which include references to the Code and live links. Many of these forms are also made available in languages other than English, and would also require updating.</p> <p>Systems - VDSS maintains numerous systems that are the foundations of programs such as Child Support Enforcement, TANF, SNAP, child welfare, and licensure of adult and children's facilities.</p> <p>A recent systems change was prompted by HB 2037 (2011) which became effective July 1, 2013. HB 2037 provided title protection for social workers. It impacted random moment sampling, reflecting a consolidation of financial pools. The work effort for this project alone was 1,083.5 IT staff hours and estimated 300 to 500 hours for the business staff. It impacted three VDSS divisions and three automated systems. The duration of the project was four months.</p>

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State Corporation Commission		Unknown. However, the financial impact on the regulated industry to which Code section applies could be significant.	The State Corporation Commission's regulatory responsibilities involve the following Code Titles: 6.2, 12.1, 13.1, 38.2, 50, 56, and 58.1 In addition, the SCC is also responsible for the following Administrative Code Titles: 5, 10, 14, 20, 21 and 24. All costs listed for item 3 (renumbering every section in the Code of Virginia) are approximate cost estimates and are based on existing technology and systems. As such, actual costs could be considerably different at the time such costs would be incurred.
Transportation, Department of	The estimates are preliminary--The agency has no information relating to a situation in which Code section numbers have merely been changed or repealed, so it is difficult to allocate costs among the activities listed above. The figures in items 1 and 2 represent costs/hours estimated by the agency for purposes of recodifying Title 33.1 only and only include the anticipated costs for the types of activities listed above. Effort and related costs associated with tracking, performing analyses and responding to requests for information associated with proposed changes in or modification to language/text contained within the sections being renumbered as well as repeal of entire sections, etc., are not included above but, based on	The estimates are preliminary and only include estimated costs for the types of activities listed above. Effort and related costs associated with tracking, performing analyses and responding to requests for information associated with proposed changes in or modification to language/text contained within the sections being renumbered as well as repeal of entire sections, etc., are not included above but, based on recodification of Title 33.1, could be significant if such changes are also involved in a renumbering of every section in the Code. VDOT will provide estimates of staff hours and time associated with the latter if requested.	As noted above, VDOT is not aware of situations in which Code sections have merely been renumbered or repealed and thus, it is somewhat difficult to provide estimates or allocate costs based on such an assumption. And as noted above, for purposes of recodifying Title 33.1, significant effort has been extended for purposes of reviewing, analyzing, and providing information in response to requests relating to changes and/or repeal of language/text in the sections being "renumbered" and in reviewing/proofing final drafts of the legislation. The costs associated with this effort have not been captured. The agency would propose that if a total code renumbering were to occur, ample time/years be afforded the effort and that not all titles be renumbered simultaneously. Further IF ANY

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	recodification of Title 33.1, were not insignificant. VDOT will provide estimates of staff hours and time associated with the latter if requested.		changes to text/language are to be made, then additional time should be afforded to such a project.
Virginia Commission for the Arts	The Virginia Commission for the Arts is a small agency and has limited printed documents. We mainly use on-line resources. We do not use Code section numbers in the materials we produce.		
Virginia Economic Development Partnership Authority			VEDP does not generally use Code section references in its documentation. We do not promulgate any regulations. While changing every section reference will be a minor annoyance for some of our internal documents and form documents, it will not be a major inconvenience.
Virginia Employment Commission	Costs and hours not separately identified.	N/A	Program manuals, forms, guidance documents, form letters, notices, canned statements for legal decisions, etc., would have to be changed. This is a significant undertaking. Our agency is well into two major automated system modernization projects, one of which is for the Unemployment Insurance Program. Code changes will have a significant impact as new system has already been structured around the current code.
Virginia Indigent Defense Commission	We handle these activities internally. Changes are incorporated into our annual training programs for attorneys and support staff.		Our agency deals exclusively with criminal defense representation. We primarily deal with current sections 18.2, 19.2 and 46.1

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
Virginia Military Institute	The annual costs associated with these changes are negligible.		References to the Institute appear in a number of places within the Code of Virginia. Ensuring that each of the references is identified and revised consistent with the renumbering would be a concern.
Virginia Parole Board		*Most of our costs are absorbed by the Dept. of Corrections	
Virginia Retirement System	We include updating training materials, handbooks, the website and forms in our normal administrative costs, so it is difficult to isolate the hours spent on such updates. In general it would probably be in the range of \$8,000 - \$10,000 per year. However, in a year like last year when we were implementing an entirely new program, the amount would have been higher.	Much of this work would be absorbed in the normal course of business. For example, handbooks would be updated at the time of the next scheduled reprinting.	As indicated earlier, these numbers are rough estimates and may be lower as it is anticipated that many of the revisions could be absorbed through normal updating processes for forms and handbooks. There would not be any new staff positions added in relation to this work.
Virginia State Police	Creating training videos Creating training materials (DVD's, CD's, handbooks) Personnel cost for filming, copying, presenting IT cost for posting training materials on website and internally	Creating training video, dvds and cds posting on website and internally	The VSP does not have the proper IT staff to make changes in the numerous databases required by such recodification. The Department would need additional funding to hire contractors to support such a task. The localities should also be surveyed. There are numerous different criminal record management systems across the state (20+). Each disparate system will require updating and maintenance due to this recodification. Some systems will not be capable of handling the changes and will need to be replaced altogether. These systems are very important because they feed into larger criminal record

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
			<p>databases and crime reporting databases. The cost to the localities will be significant. The cost figures provided for this survey are mere educated guesses, an actual cost analysis would provide much richer data regarding the cost of this monumental task. A cost analysis would dig deeper into the various IT systems and the affected paperwork, identify each item needing attention and ultimately result in a more refined cost analysis. The cost of yearly changes to the code also varies significantly each year. For example, the legislative changes from the 2014 Session were very minor and the cost were fairly minimal. However, the 2015 Session already appears to be much more costly than 2014 (based on the bills that were carried over). 2015 could reach over \$2,000,000. My point is that one year of data is insufficient for an analysis.</p>
Virginia Tech			<p>I am responding only in this last section of the survey since our answer is best made here. At Virginia Tech, our legal counsel office, as well as other units such as finance, are the primary users of the Code of Virginia as discussed in your email and survey. While we do have operating environments and documents which utilize or reference the Code of Virginia, and its numbered parts, we do not believe that we spend a significant amount of time or resources in dealing with or managing the evolving nature of the Code over time. As a</p>

AGENCY COMMENTS

Agency	Description of associated costs - Annual Updates	Description of associated costs - One-Time Renumbering	Please provide additional information or describe any other impacts that the Code Commission should consider:
			result, we do not have an estimate of the costs that we do incur. In addition, we do not believe that a restructuring of the Code of Virginia and numbering system will adversely impact Virginia Tech or our programs.
Virginia Tourism Authority	Not applicable.	Not applicable.	The Virginia Tourism Authority (doing business as the Virginia Tourism Corporation) does not believe that a recodification would result in any additional costs to the agency.
Virginia Workers' Compensation Commission	Annually the Virginia Workers' Compensation Commission (VWC) updates the Workers' Compensation Act. Code section number changes could be a part of this; however, this mostly involves verbiage and annotations. The \$30,000 is the cost to make the changes and purchase 700 copies of the Act. The 4 man-hours are attributed to the administrative time to order and distribute the 700 copies.	\$40,000 is the estimate to purchase 700 copies of the VWC Act, a complete new set of the Code of Virginia and the Virginia Administrative Code, copies of VWC Law and Practice, and copies of VWC Casefinder as well as various other Commission forms. Most of the other one-time costs would be in employee man-hours to update the Commission's claims system & various databases and to train employees and external customers.	

2426

Agency Name: Department of Motor Vehicles

Code of Virginia Renumbering Project Survey

1. Each year the General Assembly makes changes to the Code of Virginia that repeal/change Code section numbers. What are your agency's current annual costs related to this type of change? Specify costs related to:

Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Please see below description
Updating computer software, databases, and websites (include all other information technology costs)	Please see below description
Training or education for staff, contractors, or public	Please see below description
Other associated costs (please describe below)	Please see below description

Description of associated costs:

In any given General Assembly Session, it is rare for a bill to simply repeal or change a particular Code section number. Therefore, the cost of implementing a bill that simply changes one Code section number would be negligible. However, there are significant costs to DMV to implement bills that make substantive changes to the Code. Those implementation costs can vary greatly from year to year and DMV does not have a specific item in our budget to cover those costs nor do we track all staff hours required to implement legislation.

We were able to pull the IT staff hours required for implementation of legislation from 2011-2013:

- 2011: 17,604 IT staff hours (cost of at least \$933,188)
- 2012: 13,717 IT staff hours (cost of at least \$727,138)
- 2013: 14,453 IT staff hours (cost of at least \$766,153)

Please note that these figures only represent the captured IT staff hours. In general, IT hours represent about half of the total staff hours required to implement legislation. Business and operational expenses would represent the other half. This includes staff training, printing of forms, manuals, and procedures, and determining what is actually needed to implement the provisions of each bill. All of these functions would result in significantly higher implementation costs than the IT estimates set out above. Implementation of any bill can cross several other DMV administrative areas: the Communications Office, Business and Analytical Services, Data Management Services, Driver Services, Law Enforcement Services, Motor Carrier and Tax Services, the Highway Safety Office, and Vehicle Services Administration.

2. How many staff hours are spent on implementing the above every year? Varies every year.
3. The Code Commission is proposing to renumber every section in the Code of Virginia. What are your agency's estimated one-time costs related to this proposal? Specify costs related to:

Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	Please see separate attachment/email for breakdown of costs
Updating computer software, databases, and websites (include all other information technology costs)	Please see separate attachment/email for breakdown of costs
Training or education for staff, contractors, or public	Please see separate attachment/email for breakdown of costs
Other associated costs (please describe below)	Please see separate attachment/email for breakdown of costs

Description of associated costs:

Please see our separate email/attachment for a more detailed breakdown of DMV's cost estimate. As the chart illustrates, DMV would incur an estimated 14,398 staff hours and an estimated cost of \$2,294,176 in the implementation of this renumbering project. Classifying these as "one-time" costs is misleading. Prior to implementation, DMV would need to dedicate staff time and effort to participating in the work groups tasked with renumbering the Code sections pertaining to DMV and reviewing drafts of the renumbering legislation. Once the renumbered sections takes effect, training employees will be an on-going effort. In addition, DMV would need to maintain dual automated systems in the driver and vehicle functional areas, since the dates of convictions and suspensions would be based on Code sections in effect prior to renumbering and Code sections in effect following a renumbering. DMV estimates that these dual systems would need to be maintained for approximately 20 years, as convictions and suspensions can remain in effect for that period of time. Federal Motor Carrier Safety Regulations require an even longer retention period (up to an indefinite time period) for commercial driver's license holders and operators of commercial motor vehicles, depending upon the severity of the convictions/violations.

Please note that, on top of the \$2,294,176 cost estimate for renumbering the Code, DMV would also be incurring costs for implementing all other legislation from the same General Assembly Session. As you can see from Item #1 above, those costs can also be significant.

4. How many staff hours do you estimate it will take to implement these one-time changes? 14,398

5. How many full sets and individual volumes of the Code of Virginia does your agency subscribe to?

Number of full sets: 3

Number of individual volumes: 200 copies of the Virginia Criminal and Traffic Law Manual – includes all of Title 46.2 and selected laws from other titles.

6. How many full sets and individual volumes of the VAC does your agency subscribe to?

Number of full sets: 0

Number of individual volumes: 0

7. Please describe any additional information or impact that the Code Commission should consider:

Apart from the projected high cost of implementing a renumbering of the Code of Virginia, there are other concerns to take into consideration. From DMV's perspective, a renumbering of Virginia's laws does not provide any real benefit to the citizens of Virginia or to the agencies of the Commonwealth who must administer these laws. It is unclear if there is a strong public demand for renumbering the Code that would justify the high cost of implementation among all the agencies and other impacted groups and businesses. In particular, DMV believes that the current format and numbering scheme of the Code has proven to be effective in allowing us to interpret Virginia's motor vehicle laws and serve our customers.

We would also like to emphasize the impact that such renumbering would have on DMV's automated system. The agency would need to maintain dual automated systems in the driver and vehicle functional areas, since the dates of convictions and suspensions would be based on Code sections in effect prior to renumbering and Code sections in effect following a renumbering. DMV estimates that these dual systems would need to be maintained for approximately 20 years, as convictions and suspensions can remain in effect for that period of time. Federal Motor Carrier Safety Regulations require an even longer retention period (up to an indefinite time period) for commercial driver's license holders and operators of commercial motor vehicles, depending upon the severity of the convictions/violations. The last recodification of the motor vehicle laws occurred in 1989 when Title 46.1 was recodified as Title 46.2.

We would also note the potential impact renumbering would have on our employees who have worked with and utilized the current Code since 1989. The effort that will be expended on learning the renumbered Code will be significant in light of the minimal benefit derived from reorganization.

Finally, the Appropriations Act has many references to various Code sections that impact DMV's fees, our distribution of revenues, and other responsibilities of the agency. A renumbering of the Code would also require that these references are reconciled to avoid potential conflicts in law.

Again, thank you for the opportunity to provide these comments. Should you have any questions, please do not hesitate to contact me.

8. Contact for additional questions:

Name/Title: Richard D. Holcomb, DMV Commissioner
Email/Phone: richard.holcomb@dmv.virginia.gov; (804) 367-6606

Please email completed survey to codes@dls.virginia.gov or fax to (804) 692-0625 by Monday, April 7, 2014.

**VIRGINIA DEPARTMENT OF MOTOR VEHICLES
CODE RENUMBERING COST ESTIMATE**

ADMINISTRATIVE AREA	REQUIRED TASKS	ESTIMATED STAFF HOURS	ESTIMATED COST
Communications Office (CO)	<ul style="list-style-type: none"> • Update DMV publications for which the area is responsible. • Tasks include updating, proofreading, converting to high resolution for print and low resolutions for web sites. • Approximately 50 publications would be affected. 	50	\$2,026
Business and Analytical Services (BAS)	<ul style="list-style-type: none"> • Identify procedures and forms affected by code changes. Approximately 702 procedures and 68 forms may be impacted. • Process revisions to affected procedures and forms, and obtain business owner approvals. • Finalize procedure and form revisions, proof electronic files and update/convert electronic files for DMV web sites. • Send notification to affected DMV staff with informational copies of revised procedures and forms. • Coordinate with Information Technology Services (ITS) to publish procedures and forms to DMV web sites. • Coordinate with Printing/Mail Services to print and ship supplies of revised forms to all DMV service outlets and users. 	2,310	\$91,560
Data Management Services (DMS)	<ul style="list-style-type: none"> • Develop matrix cross referencing old code numbers and new code numbers. • Identify/verify all forms, publications, orders/notices, pc-generated form letters, procedures and other documents affected by code changes. • Determine required changes to forms, publications, orders/notices, pc-generated form letters, procedures and other documents. • Coordinate with IT, Web Services and BAS Procedures/Forms Dept. • Obtain management approval of revised documents and stakeholder notifications. • Conduct training sessions with work centers. • Coordinate with Printing Services and Mail Services to ensure that revised documents are distributed and letters mailed by the established date. 	120	\$4,850

**VIRGINIA DEPARTMENT OF MOTOR VEHICLES
CODE RENUMBERING COST ESTIMATE**

ADMINISTRATIVE AREA	REQUIRED TASKS	ESTIMATED STAFF HOURS	ESTIMATED COST
Driver Services (DSA)	<ul style="list-style-type: none"> • Develop matrix cross referencing old code numbers and new code numbers. • Identify/verify all forms, publications, orders/notices, pc-generated form letters, procedures and other documents affected by code changes. • Determine required changes to forms, publications, orders/notices, pc-generated form letters, procedures and other documents. • Coordinate with IT, Web Services and BAS Procedures/Forms Dept. • Identify affected external stakeholders. • Develop/update electronic mailing lists for identified external stakeholders. • Draft notifications to external stakeholders. • Obtain management approval of revised documents and stakeholder notifications. • Finalize letters to stakeholders. • Conduct training sessions with work centers. • Coordinate with Printing Services and Mail Services to ensure that revised documents are distributed and letters mailed by the established date. • A total of 49 forms, 18 publications, and 184 orders/notices would be affected. 	720	\$28,753
Information Technology Services (ITS)	<ul style="list-style-type: none"> • Automated system requirements for recodification of Virginia Code. • Modify all automated programs, correspondence, forms, notices, orders, tables, and transcripts containing code references in the driver, financial, motor carrier, and vehicle functional areas. • For example, in the driver area alone there are 188 different orders, notices, and types of correspondence listed on the order table. Many of these orders have more than one version and all versions would need to be modified. 	7,088	\$479,170

**VIRGINIA DEPARTMENT OF MOTOR VEHICLES
CODE RENUMBERING COST ESTIMATE**

ADMINISTRATIVE AREA	REQUIRED TASKS	ESTIMATED STAFF HOURS	ESTIMATED COST
	Personnel. <ul style="list-style-type: none"> • Outsourced reprinting of forms (not included in overall printing cost estimate). 		\$6,450
	Total		\$73,712
Motor Carrier and Tax Services	<ul style="list-style-type: none"> • Account for all forms, documents, publications, procedure manuals, documents posted to the internet and intranet, and associated links. • Review each of the above to determine if code reference is noted regardless of the format of the document or the method of distribution (e.g., pdf, printed and displayed in CSC, available via the internet or intranet, and any combination of these). • Cross reference old code number to new code number. • Coordinate with IT personnel to ensure required system updates are identified and updated information is provided to get system changes implemented as needed. • Coordinate with Web Services to get corrections and links updated for web documents. • Provide for the review of changes by management and the correction of any errors and that all updates have been reviewed. • Obtain and track appropriate approvals from all parties inside and outside of the agency. • Ensure updates and notification to non-DMV stake holders are completed (e.g. legislature, industry representatives, other State agencies, local governments). • Work with purchasing to procure updated forms and made available when and where needed. 	1,300	\$59,755
Printing Services	<ul style="list-style-type: none"> • A total of approximately 95 DMV forms and publications contain Code references and would be impacted by recodification. Reflects cost to produce the initial amount for all locations and dispose of the existing forms. 	N/A	\$1,507,863
Transportation Safety	<ul style="list-style-type: none"> • Identify/verify all forms, publications, form letters, procedures 	220	\$9,713

**VIRGINIA DEPARTMENT OF MOTOR VEHICLES
CODE RENUMBERING COST ESTIMATE**

ADMINISTRATIVE AREA	REQUIRED TASKS	ESTIMATED STAFF HOURS	ESTIMATED COST
	<p>and other documents affected by code changes.</p> <ul style="list-style-type: none"> • Determine required changes to forms, publications, form letters, procedures and other documents. • Coordinate with IT, Web Services and Forms representative. • Identify affected external stakeholders. • Develop/update electronic mailing lists for identified external stakeholders. • Draft notifications to external stakeholders. • Obtain management approval of revised documents and stakeholders notifications. • Conduct training sessions to staff. • Coordinate with Printing Services and Mail Services to ensure that revised documents are distributed and letters mailed by the established date. 		
Vehicle Services Administration (VSA)	<ul style="list-style-type: none"> • Develop matrix cross referencing old Code numbers and new Code numbers. • Identify/verify all forms, publications, orders/notices, pc-generated form letters, procedures and other documents affected by code changes. • Determine required changes to forms, publications, orders/notices, pc-generated form letters, procedures and other documents. • Coordinate with IT, Web Services and BAS Procedures/Forms Dept. • Identify affected external stakeholders. • Develop/update electronic mailing lists for identified external stakeholders. • Draft notifications to external stakeholders. • Obtain management approval of revised documents and stakeholder notifications. • Finalize letters to stakeholders; conduct training sessions with work centers. • Coordinate with Printing Services and Mail Services to ensure that revised documents are distributed and letters mailed by 	790	\$29,281

**VIRGINIA DEPARTMENT OF MOTOR VEHICLES
CODE RENUMBERING COST ESTIMATE**

ADMINISTRATIVE AREA	REQUIRED TASKS	ESTIMATED STAFF HOURS	ESTIMATED COST
Workforce Development Division (WDD)	the established date.		
	eLearning: <ul style="list-style-type: none"> • Review 165 eLearnings for references to Code • Update eLearnings which includes changing text, changing narration, resync, review changes, publish eLearning, test eLearning, upload to the Knowledge Center, retest Technical training: <ul style="list-style-type: none"> • Review 6 courses for CSMA, 3 courses for Call Centers, and 1 course for DMV Select for references to Code (example: review of Compliance would include reviewing an 85 page outline and powerpoint slides, a 159 page participant guide and 24 handouts) • Update courses • Proof and edit courses • Convert to PDF for print shop • Mail materials to trainers 	140	\$3,293
Total		14,398	\$2,294,176

Number of Code Subscriptions

Agency	Code of Virginia - # full sets	Code of Virginia - # single volumes	Virginia Administrative Code - # full sets	Virginia Administrative Code - # single volumes
Aging and Rehabilitative Services, Department for	2	1	0	0
Agriculture and Consumer Services, Department of	1	9		
Attorney General's Office	38	400	0	50
Auditor of Public Accounts	3	0	3	0
Aviation, Department of	1	0	1	0
Capitol Police, Division of	0	1	0	0
Comprehensive Services	0	0	0	0
Corrections, Department of	1	0	1	0
Council on Virginia's Future	0	0	0	0
Elections, State Board of	0	5000	0	0
Emergency Management, Department of	1		1	
Environmental Quality, Department of	2	22	0	0
Fire Programs, Dept of	0	1	0	0
Forensic Science, Department of	1	5	0	0
Forestry, Department of	0	0	0	0
Health Professions, Department of		58		
Historic Resources, Dept. of	1	1	1	1
House of Delegates	130	0		6
Housing and Community Development, Dept of	2	5	0	0
Housing Development Authority, Virginia	1		1	
Joint Legislative Audit and Review Commission	1	0	0	0
Library of Virginia	3	0	1	1
Marine Resources Commission	1	0	0	0
Mary Washington, University of	0	0	0	0
Medical Assistance Services, Department of	1	0	0	0
Mines, Minerals and Energy, Department of	3	2	0	0
Motor Vehicle Dealer Board	0	20	0	0
Motor Vehicles, Department of	3	200		
Planning and Budget, Department of	1	0	0	0
Professional & Occupational Regulation, Department of	2	59	0	0
Rail and Public Transportation, Dept. of	1		1	

Number of Code Subscriptions

Agency	Code of Virginia - # full sets	Code of Virginia - # single volumes	Virginia Administrative Code - # full sets	Virginia Administrative Code - # single volumes
Science Museum of Virginia	1	1	1	1
Senate of Virginia	50	50	50	50
Social Services, Department of	1	400	1	
State Corporation Commission	18	260	2	0
Supreme Court of Virginia	689	101	2	0
Taxation, Dept. of	4	600	1	30
Transportation, Department of	3	4		4
Virginia Economic Development Partnership Authority	1	1	1	0
Virginia Employment Commission	0	0	1	0
Virginia Indigent Defense Commission	1	0	0	0
Virginia Lottery	1		1	
Virginia Military Institute	1	3		
Virginia Parole Board	0	3	0	0
Virginia Retirement System	1	0	0	0
Virginia State Bar	1	113	0	0
Virginia State Police	4	2400	0	0
Virginia Workers' Compensation Commission	1		1	
TOTALS	977	9720	71	143



Renumbering the Code of Virginia - Please Respond By April 7

Virginia Code <vacode@dls.virginia.gov>
Draft

Mon, Apr 21, 2014 at 2:51 PM

----- Forwarded message -----

From: Virginia Code <vacode@dls.virginia.gov>
Date: Mon, Mar 17, 2014 at 11:42 AM
Subject: Renumbering the Code of Virginia - Please Respond By April 7
To: Virginia Code <vacode@dls.virginia.gov>

TO: Agency Heads

CC: Office of the Governor, Cabinet Secretaries, Members of the Virginia Code Commission

FROM: Senator John S. Edwards, Chair, Virginia Code Commission

SUBJECT: Feasibility of Renumbering the Code of Virginia

In 2005, the General Assembly unanimously approved Senate Joint Resolution 388, which recognizes that the Code of Virginia has not been completely renumbered since 1950 and that "the numbering system for the Code of Virginia is becoming increasingly convoluted and disorganized." The Virginia Code Commission began the process to renumber the Code in 2005, but the project was subsequently halted in 2006 due to monetary concerns.

The Virginia Code Commission is again considering a reorganization and total renumbering of the Code of Virginia, and a subcommittee has been established to conduct a feasibility study. The last recodification of the entire Code of Virginia was completed in 1950. Prior to 1950, revisions of such magnitude occurred roughly every 30 years. This reorganization and renumbering project will involve very few substantive changes to statutory language. It will, however, result in new section numbers for all Code sections, and some articles and chapters will be moved from one title to another as part of the reorganization process.

Inasmuch as all governmental agencies will be affected by the reorganization and renumbering to some degree, I am writing to ensure that you are aware that the Code Commission is considering this project and to ask for your input as to the potential impact, fiscal and otherwise, that the project would have on your agency.

You are invited to take a survey, using the link below, to assist the Code Commission in evaluating the potential overall fiscal impact of this important project. Please complete the survey by Monday, April 7. The subcommittee will be reviewing responses with an expectation of reporting to the Code Commission this spring.

If you have any difficulty with the survey instrument, please contact Jane Chaffin (phone: (804) 786-3591 ext. 262; email: jchaffin@dls.virginia.gov). Thank you for taking the time to provide this vital information.

Click the link below to take the survey:

<http://survey.legis.virginia.gov/Survey.aspx?s=25e17a9fa49c4aeb8c793a1b75215e0b>

Agency Name: _____

Code of Virginia Renumbering Project Survey

1. Each year the General Assembly makes changes to the Code of Virginia that repeal/change Code section numbers. What are your agency's current annual costs related to this type of change? Specify costs related to:

Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	\$
Updating computer software, databases, and websites (include all other information technology costs)	\$
Training or education for staff, contractors, or public	\$
Other associated costs (please describe below)	\$

Description of associated costs:

2. How many staff hours are spent on implementing the above changes each year? _____

3. The Code Commission is proposing to renumber every section in the Code of Virginia. What are your agency's estimated one-time costs related to this proposal? Specify costs related to:

Amending and printing forms, brochures, manuals, regulations, guidance documents, or similar materials	\$
Updating computer software, databases, and websites (include all other information technology costs)	\$
Training or education for staff, contractors, or public	\$
Other associated costs (please describe below)	\$

Description of associated costs:

4. How many staff hours do you estimate it will take to implement these one-time changes? _____

5. How many full sets and individual volumes of the Code of Virginia does your agency subscribe to?

Number of full sets	
Number of individual volumes	

6. How many full sets and individual volumes of the Virginia Administrative Code does your agency subscribe to?

Number of full sets	
Number of individual volumes	

7. Please describe any additional information or impact that the Code Commission should consider:

8. Who should we contact if we have additional questions?

Name/Title: _____

Email/Phone: _____

Please email completed survey to codes@dls.virginia.gov or fax to (804) 692-0625 by Monday, April 7, 2014.