

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22VAC30-110
VAC Chapter title(s)	Assessment in Assisted Living Facilities
Action title	Public Pay ALF Assessment Manual
Date this document prepared	November 15, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Guidance Document Update

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.

BACKGROUND:

An assessment using the Uniform Assessment Instrument is required for all individuals upon admission to an assisted living facility (ALF) and at certain intervals. §63.2-1804 of the Code of Virginia.

The Public Pay ALF Assessment Manual builds upon regulations found in 22 VAC 30-110 and provides guidance for local departments of social services (LDSS) and other types of assessors regarding the assessment of individuals applying to reside in or living in an ALF with an Auxiliary Grant.

The proposed changes to the Public Pay ALF Assessment Manual are summarized below:

- Struck references to “targeted case management” or “Medicaid case management” in ALF settings. This program is no longer provided by Department of Medical Assistance Services (DMAS) and DMAS has stricken references to this program in agency manuals (Entire Manual)
- Struck duplicative or repetitive content. (Entire Manual)
- Used acronyms when appropriate. (Entire Manual)
- Stated that sample assessment decision letters have been relocated to the DSS intranet. (Entire Manual)
- Struck section addressing special care needs as this does not fall within the purview of DARS. (Entire Manual)
- Renumbered headings as needed. (Entire Manual)
- Pursuant to budget language and regulatory language, clarified that there is no payment to a non-LDSS assessor for conducting an assessment. (Section 14.1)
- Updated definitions of “assisted living facility” and “public human services agency.” (Section 14.3)
- Corrected the name of the DMAS computer system for screenings (Section 14.11)
- Clarified content about UAI training. (Section 14.12)
- Referenced location of Auxiliary Grant Supportive Housing (AGSH) operating manual. (Section 14.27)
- Referenced who may provide mental health or intellectual disability services. (Section 14.47.1)
- Referenced APS Division staff who may provide technical assistance to LDSS. (Section 14.54)
- Updated heading to better reflect the content that follows. (Appendix)

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0 Indirect Costs: \$0
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	Direct Benefits: \$0	
	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	Non-Monetized Indirect Benefits: Ensuring that the Public Pay ALF Assessment Manual filed on the Town Hall website is updated and consistent with current state law, regulations, and Division procedures and provides LDSS staff, the public, and stakeholders with a clear and accessible information. This advances ORM's goals of streamlined access and transparency. In addition, eliminating duplicative content reduces administrative burden on the LDSS.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0	
	Indirect Costs: \$0	
	Direct Benefits: \$0	
	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	Non-Monetized Indirect Costs: If the Public Pay ALF Assessment Manual is not updated on Town Hall to reflect current practices and information, it could create confusion among LDSS staff, the public, and other stakeholders, and run contrary to ORM's goals of streamlined access and transparency.	

(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	There are no alternatives that result in updating this existing guidance document. Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(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)	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)	Local partners include the LDSS. Direct Costs: \$0 Indirect Costs: \$0
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	Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Non-Monetized Indirect Benefits: Ensuring that the Public Pay ALF Assessment Manual filed on the Town Hall website is updated and consistent with current state law, regulations, and Division procedures and provides LDSS staff, the public, and stakeholders with a clear and accessible information. This advances ORM's goals of streamlined access and transparency. In addition, eliminating duplicative content reduces administrative burden on the LDSS.	
(4) Assistance	N/A	
(5) Information Sources		

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)	There is no impact on families. Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources		

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)	There is no impact on small businesses. Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Alternatives	N/A	
(5) Information Sources		

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	Net Change
	Statutory:				
	Discretionary:				

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases

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

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	Original Length	New Length	Net Change in Length
Public Pay ALF Assessment Manual	70 pages	64 pages	-6 pages