

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22VAC30-30
VAC Chapter title(s)	<ul style="list-style-type: none"> • Centers for Independent Living (CIL) General Policies and Procedures Manual (ID: 4541) (revise) • Electronic Storage of CIL Consumer Service Records (ID: 6964) (delete) • Electronic Signatures Guidance for Independent Living Centers (ID: 6992) (delete)
Action title	Update Policies & Procedures for CILs
Date this document prepared	May 15, 2024
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: Virginia has 17 Centers for Independent Living (CIL) and three CIL satellites that provide Virginians with disabilities community based, consumer directed, independent living (IL) services. CILs provide five core services: advocacy, information and referral, independent living skills training, peer counseling (support and mentoring), and transition services. Transition services involves three prongs: 1) transitioning people currently institutionalized into community-based settings; 2) diverting people at risk of being institutionalized to community-based services and supports; and 3) providing post-secondary training and services to youth with disabilities transitioning to IL and employment. CILs also provide an array of other IL services in response to the specific needs of the communities they serve.

CILs are funded with a combination of federal funding and state funding through a General Assembly appropriation, which is administered by the Virginia Department for Aging and Rehabilitative Services (DARS) as grants.

The CIL General Policies and Procedures Manual builds upon regulations found in 22VAC30-30 and provides guidance for CILs in Virginia. The proposed changes to the CIL General Policies and Procedures Manual are summarized below:

- Updated outdated references for the Department for Rehabilitative Services (DRS) to the Department for Aging and Rehabilitative Services (DARS). (entire manual)
- Reduced duplicative and/or redundant language. (entire manual)
- Simplified use of acronyms for consistency throughout the manual. (entire manual)
- Condensed language to increase clarity. (entire manual)
- Updated and condensed sections on the CIL grant process to increase clarity and conciseness.
- Added definitions to improve clarity. (Section I)
- Updated language containing references to repealed code sections regarding DARS' granting authority. Chapters 4 & 6 of Title 51.5 of the Code of VA have been repealed. Granting authority is authorized in Chapter 14, Article 10 of Title 51.5. (Section I. Introduction)
- Updated language regarding CIL grant eligibility to increase clarity, including direct references to relevant VAC sections. (Section II. Grants to CILs)
- Updated language concerning applicability of the Virginia Freedom of Information Act (FOIA) to CILs for clarity and conciseness (Section II. Grants to CILs)
- Updated language to include references to relevant sections of VAC. (Section III. Criteria for Awarding Grants)
- Removed language specifying activities for CIL cooperation with the DARS Personal Assistance (PAS) Program that are not required by regulation. 22VAC30-30-131 F 3 c requires cooperation with the DARS PAS Program but does not specify activities. (Section III. Criteria for Awarding Grants)
- Updated language concerning consumer eligibility for CIL services to increase clarity.
- Updated language specifying IL core services to conform with the Rehabilitation Act of 1973, as amended (the Act) and § 51.5-163 of the Code of Virginia. (Section IV. Center Services and Operations)

- Incorporated guidance on electronic record storage and electronic signatures issued in March and May 2021, respectively. (Section IV. Center Services and Operations)
 - These two standalone guidance documents are being deleted.
- Incorporated language clarifying program/fiscal monitoring objectives. (Section IV. Center Services and Operations)
- Eliminated Section VII, Travel Regulations and incorporated it into Section VI, Fiscal Policies and Procedures.
- Eliminated Section XII, Working Lunches and Section XIII, Revision of the Manual, because they are no longer needed in the manual.
- Clarified that fiscal requirements for counter-signatures are addressed in each CIL’s fiscal policies (revised in response to public comment).

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

(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)	Ensures the CIL General Policies and Procedures Manual filed on the Town Hall website is updated and consistent with current practices and provides the CIL staff, consumers, the public, and stakeholders with a clear and publicly accessible location for the CIL policies and procedures. This advances ORM’s goals of streamlined access and transparency. In addition, the elimination of duplicative/redundant language simplifies guidance and reduces the administrative burden on CILs.	
(5) Information Sources		

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

(1) Direct & Indirect Costs &	Direct Costs: \$0
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Benefits (Monetized)	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)	If the CIL General Policies and Procedures Manual is not updated on Town Hall to reflect current practices and information, it has the potential to create confusion among CIL staff, consumers, the public, and other stakeholders, and runs 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)	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	
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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: \$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) 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
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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)	Designed and operated by individuals with disabilities, CILs provide IL services for people with disabilities. Receiving IL services can be life changing for individuals with disabilities and their families. They can ensure individuals continue to live in their homes and be fully integrated into their communities. The changes to the CIL General Policies and Procedures Manual should not have a direct impact on families or consumers, but rather work to support the work and operation of CILs.	
(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 a minimal, but positive impact, on small businesses such as the 17 CILs and three CIL satellites since they are considered 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)	<p>All CILs that DARS partners with are considered small businesses. They are legally organized as non-profit organizations. Ensuring that the CIL General Policies and Procedures Manual filed on the Town Hall website is updated and consistent with current practices provides the CIL staff, consumers, the public, and stakeholders with a clear and publicly accessible location for the CIL policies and procedures. In addition, the elimination of duplicative/redundant language simplifies guidance and reduces the administrative burden on CILs. In preparing these changes, DARS consulted with the Virginia Association of Centers for Independent Living (VACIL), which represents the CILs, and received their input and support for this effort.</p>
(4) Alternatives	
(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:				
				Total Net Change of Statutory Requirements:	
				Total Net Change of Discretionary Requirements:	

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
CIL General Policies and Procedures Manual	29 pages	23 pages	-6 pages
Electronic Storage of CIL Consumer Service Records	2 pages	0 pages (deleted)	-2 pages
Electronic Signatures Guidance for Independent Living Centers	3 pages	0 pages (deleted)	-3 pages

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