

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	State Board of Social Services
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	22VAC 40-211
<b>VAC Chapter title(s)</b>	Child Protective Services
<b>Action title</b>	Remove Notary Requirement for Consent to Central Registry System Check
<b>Date this document prepared</b>	
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Final

**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)**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p><b>The Department of Social Services’ Office of Background Investigations (OBI) Central Virginia Child Abuse and Neglect Central Registry Unit performs searches at the request of individuals who seek to provide services or care to children to determine if those individuals have a founded case of child abuse or neglect. The current regulation requires, in part, that an individual’s consent for a search of the Central Registry System (CRS) be notarized. This regulatory action will remove the notary requirement in order to expedite the search process and make it less burdensome for individuals who wish to provide services or care to children through employment, foster care, adoption, or volunteer opportunities.</b></p> <p><b>The final regulation will replace an emergency regulation, which expires on 8/31/2024. No changes have been made since publication of the emergency regulation. This action will result in regulatory reduction.</b></p> <p>Direct Costs: None anticipated.</p> <p>Indirect Costs: None anticipated.</p> <p>Direct Benefits: Individuals seeking approval to provide child care and services must locate a notary, have the consent form notarized, and mail the consent to the agency. Notary officials may charge applicant up to \$5.00 per request. Approximately 180,000 search requests are performed annually.</p> <p>Indirect Benefits: None anticipated.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>
	<p>(a)</p>	<p>(b) (\$900,000)</p>
<p>(3) Net Monetized Benefit</p>	<p>(\$900,000)</p>	
<p>(4) Other Costs &amp; Benefits (Non-Monetized)</p>	<p>Reduction in submission and processing time will benefit providers, facilities and programs who utilize the central registry search request process. The time it takes to on-board new employees will be reduced.</p>	
<p>(5) Information Sources</p>		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<b>Maintaining the current regulation would not reduce regulatory burden on individuals requesting background checks and would not decrease the time it takes for facilities and programs to on-board new employees.</b>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p><b>The requirement for a notarized consent to a background check can only be eliminated via a regulatory action. A regulation change is the only way to reduce regulatory burden.</b></p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		

(4) Other Costs & Benefits (Non-Monetized)	
(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)	<b>None anticipated.</b>  Direct Costs: Describe the direct costs of this proposed change here.  Indirect Costs: Describe the indirect costs of the proposed change.  Direct Benefits: Describe the direct benefits of this proposed change here.  Indirect Benefits: Describe the indirect benefits of the proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(4) Assistance		
(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)	<p><b>None anticipated.</b></p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	<p><b>Reduction in submission and processing time will benefit families who have children needing care, as well as applicant foster and adoptive parents.</b></p>	
(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)	<p><b>None anticipated</b></p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	Reduction in submission and processing time will benefit providers who serve children needing care.	
(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	Total Net Change in Requirements
160	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	9	0	0	0
	(D/R):	1	0	-1	-1
170	(M/A):	0	0	0	0
	(D/A):	1	0	0	0
	(M/R):	0	0	0	0
	(D/R):	1	0	-1	-1
<b>Grand Total of Changes in Requirements:</b>					(M/A):0 (D/A):0 (M/R):0 (D/R):-2

**Key:**

*Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:*

**(M/A):** Mandatory requirements mandated by federal and/or state statute affecting the agency itself

**(D/A):** Discretionary requirements affecting agency itself

**(M/R):** Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies

**(D/R):** Discretionary requirements affecting external parties, including other agencies

*Cost Reductions or Increases (if applicable)*

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

*Other Decreases or Increases in Regulatory Stringency (if applicable)*

<b>VAC Section(s) Involved*</b>	<b>Description of Regulatory Change</b>	<b>Overview of How It Reduces or Increases Regulatory Burden</b>

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

<b>Title of Guidance Document</b>	<b>Original Length</b>	<b>New Length</b>	<b>Net Change in Length</b>

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