

Office of Regulatory Management
Economic Review Form

Agency name	State Board of Social Services
Virginia Administrative Code (VAC) Chapter citation(s)	22 VAC 40-705
VAC Chapter title(s)	Child Protective Services
Action title	Amend CPS Regulation-2024
Date this document prepared	August 21, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Exempt

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 & Indirect Costs & Benefits (Monetized)</p>	<p>This exempt action conforms the regulation language to §§ 63.2-100, 63.2-1505, 63.2-1506.1, and 63.2-1531—63.2-1536, effective 7/1/2024. It is in response to Chapter 779 (SB 12), Chapter 829 (HB1128), Chapter 662 (SB 39) and Chapter 629 (HB 27) of the 2024 Acts of Assembly.</p> <p>Any monetized costs and benefits on the underlying piece of legislation was considered by the Virginia General Assembly and included in the 2024 Appropriation Act.</p> <p>Direct Costs: SB 39 and HB 27 establish the Parental Child Safety Placement Program to promote and support placements of children with relatives and fictive kin by local departments of social services. Based on the 2024 Fiscal Impact Statement for SB 39 and HB 27 issued by the Department of Planning and Budget (DPB), it will have a \$12,173,560 general fund cost.</p> <p>Indirect Costs: There are no indirect costs to the proposed change.</p> <p>Direct Benefits: Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency. Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.</p> <p>Indirect Benefits: There are no indirect benefits to the proposed change.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p> <p>(a) \$12,173,560</p>	<p>Direct & Indirect Benefits</p> <p>(b) n/a</p>
<p>(3) Net Monetized Benefit</p>	<p>\$12,173,560</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency.</p>	

	Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.
(5) Information Sources	DPB’s Fiscal Impact Statements are available on LIS at: https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+HB27FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB39FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB12FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB12FER122+PDF

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>This exempt action conforms the regulation language to §§ 63.2-100, 63.2-1505, 63.2-1506.1, and 63.2-1531—63.2-1536, effective 7/1/2024. It is in response to Chapter 779 (SB 12), Chapter 829 (HB1128), Chapter 662 (SB 39) and Chapter 629 (HB 27) of the 2024 Acts of Assembly. Maintaining the status quo is not an option.</p> <p>Direct Costs: There are no direct or indirect costs or benefits to the status quo.</p> <p>Indirect Costs: There are no direct or indirect costs or benefits to the status quo.</p> <p>Direct Benefits: There are no direct or indirect costs or benefits to the status quo.</p> <p>Indirect Benefits: There are no direct or indirect costs or benefits to the status quo.</p>	
(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	n/a	

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

(1) Direct & Indirect Costs &	There are no alternatives, as the action simply conforms the regulation in compliance with language in the Code of Virginia.
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Benefits (Monetized)	Direct Costs: NA Indirect Costs: NA Direct Benefits: NA Indirect Benefits: NA	
(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	n/a	

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)	<p>Any monetized costs and benefits on the underlying piece of legislation was considered by the Virginia General Assembly and included in the 2024 Appropriation Act.</p> <p>Direct Costs: SB 39 and HB 27 establish the Parental Child Safety Placement Program to promote and support placements of children with relatives and fictive kin by local departments of social services. Based on the 2024 Fiscal Impact Statement for SB 39 and HB 27 issued by the Department of Planning and Budget (DPB), it will have a \$12,173,560 general fund cost.</p> <p>Indirect Costs: There are no indirect costs or benefits to the proposed change that impact local partners.</p> <p>Direct Benefits:</p>
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	<p>Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency.</p> <p>Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.</p> <p>Indirect Benefits: There are no direct or indirect costs or benefits to the proposed change that impact local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$12,173,560	(b) n/a
(3) Other Costs & Benefits (Non-Monetized)	<p>Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency.</p> <p>Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.</p>	
(4) Assistance	n/a	
(5) Information Sources	<p>DPB’s Fiscal Impact Statements are available on LIS at: https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+HB27FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB39FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB12FER122+PDF https://lis.virginia.gov/cgi-bin/legp604.exe?241+oth+SB12FER122+PDF</p>	

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>Direct Costs: There are no direct or indirect costs to the proposed change that impact families.</p> <p>Indirect Costs: There are no direct or indirect costs to the proposed change that impact families.</p>
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	<p>Direct Benefits:</p> <p>Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency.</p> <p>Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.</p> <p>Indirect Benefits: There are no indirect benefits to the proposed change that impact families.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) n/a	(b) n/a
(3) Other Costs & Benefits (Non-Monetized)	<p>Parental Child Safety Placement Program (HB 27 and SB 39): Families will benefit as the Parental Child Placement Program ensures protections for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and provides concrete timeframes for permanency.</p> <p>Facilitation of Children’s Advocacy Center Interviews (HB 1128 and SB 12): Children and families may benefit from interviews conducted at Children’s Advocacy Center when there is concern of human trafficking.</p>	
(4) Information Sources	n/a	

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>Direct Costs: There are no direct or indirect costs or benefits to the proposed change that impact small business.</p> <p>Indirect Costs: There are no direct or indirect costs or benefits to the proposed change that impact small business.</p> <p>Direct Benefits: There are no direct or indirect costs or benefits to the proposed change that impact small business.</p> <p>Indirect Benefits: There are no direct or indirect costs or benefits to the proposed change that impact small business.</p>
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(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 Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
10	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0

VAC Section Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
60	(M/A):	0			
	(D/A):	0			
	(M/R):	13	1		1
	(D/R):	0	3		3

VAC Section Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
70	(M/A):	0			
	(D/A):	0			
	(M/R):	2	1		1
	(D/R):	2			

VAC Section Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
80	(M/A):	0			
	(D/A):	0			
	(M/R):	1			0
	(D/R):	18			0

VAC Section Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
200	(M/A):				
	(D/A):				
	(M/R):	0	13		13
	(D/R):	0	19		19

Use this table to add total net changes in requirements of all sections involved (if only one section changed-add total of the one section).	Grand Total of All Changes in Requirements:	(M/A):
		(D/A):
		(M/R): 15
		(D/R): 22

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
n/a				

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
n/a		

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
n/a			

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