



Virginia Department of Criminal Justice Services Agency Response to Economic Impact Analysis

Prepared on July 1, 2026

The Department of Criminal Justice Services (DCJS) generally concurs with the Economic Impact Analysis (EIA) prepared by the Department of Planning and Budget regarding the proposed amendments to 6VAC20-160. DCJS agrees that the proposed regulatory amendments are largely clarifying, administrative in nature, and are not expected to result in significant economic impacts to the Commonwealth, local governments, or Virginia Court Appointed Special Advocate (CASA) programs. The Department appreciates DPB's thorough review of the proposed amendments, however, requests to clarify the discussion of the proposed amendment to Section 50 concerning volunteer conflicts of interest and relationships with child clients and their families.

The Economic Impact Analysis states:

"Section 50 (Case Management) would be amended to allow a CASA volunteer to be assigned to a case when there is a personal relationship provided the relationship would not create a conflict of interest. The current regulation does not allow any professional connection or close personal relationship, regardless of whether a conflict of interest would be created. DCJS reports that there are rare cases, especially in small communities, where advocates may have personal relationships with the children whose cases they are appointed to."

This statement does not accurately reflect the information provided by DCJS during the development of the Economic Impact Analysis.

DCJS explained that there may be rare instances, particularly in smaller communities, in which a CASA volunteer has a professional relationship with a child client or the child's family that would not create a conflict of interest. DCJS did not intend to suggest that a volunteer could be assigned to a case involving a close personal relationship with a child client or family member where such a relationship would compromise, or appear to compromise, the volunteer's impartiality.

The proposed amendment retains the prohibition on assigning a CASA volunteer to a case involving any professional connection or close personal relationship that would create a conflict of interest. The intent of the amendment is to provide limited flexibility for situations involving professional connections that do not impair the volunteer's objectivity, while continuing to protect the independence and impartiality of CASA volunteers.

Accordingly, DCJS respectfully submits this clarification to ensure that the purpose and intended application of the proposed amendment are accurately reflected in the regulatory record. The Department concurs with the remainder of DPB's Economic Impact Analysis.