

Office of Regulatory Management
Economic Review Form

Agency name	State Board of Social Services
Virginia Administrative Code (VAC) Chapter citation(s)	22 VAC 40-295
VAC Chapter title(s)	Temporary Assistance for Needy Families (TANF)
Action title	Amend Temporary Assistance for Needy Families
Date this document prepared	8/23/2024
Regulatory Stage (including Issuance of Guidance Documents)	Fast Track

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>The TANF Program provides cash assistance to eligible needy families that include a minor child living with a parent or caretaker relative.</p> <p>Section 10, Definitions, references the Virginia Department of Social Services (VDSS) Child Day Care policy in the two definitions, “Affordable Child Care Arrangements,” and “Unsuitability of informal child care.” The entire VDSS Child Day Care policy manual is included in the regulation as a document incorporated by reference (DIBR).</p> <p>In 2021, administration of the Child Care Program moved from VDSS to the Virginia Department of Education (VDOE). This regulatory action will replace references to the VDSS Child Day Care policy manual, with the VDOE Child Care Subsidy Guidance Manual, in the above definitions.</p> <p>Also, the updated references will identify the specific sections of the VDOE manual that are applicable, rather than the <u>entire</u> contents of the manual. The applicable sections of the VDOE guidance manual will replace the VDSS manual as the DIBR for this VAC chapter. This will result in a reduction in requirements. There are no monetizable costs and benefits.</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>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0.00</p>	<p>(b) \$0.00</p>
<p>(3) Net Monetized Benefit</p>	<p>\$0.00</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>The non-monetized benefit is removal of unnecessary requirements associated with the current DIBR. This reduces the time and effort required for the agency to remain in compliance with the regulation. Local departments of social services and applicants/recipients of TANF will have access to the accurate DIBR.</p> <p>There are no non-monetized costs associated with this change.</p>	
<p>(5) Information Sources</p>	<p>N/A</p>	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>The current regulation includes an obsolete DIBR and imposes multiple unnecessary requirements. Only a regulatory change can address these issues.</p> <ul style="list-style-type: none"> • Direct Costs: There are no monetizable direct costs associated with maintaining the status quo. • Indirect Costs: There are no monetizable indirect costs associated with maintaining the status quo. • Direct Benefits: There are no monetizable direct benefits associated with maintaining the status quo. • Indirect Benefits: There are no monetizable direct benefits associated with maintaining the status quo. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0.00	(b) \$0.00
(3) Net Monetized Benefit	\$0.00	
(4) Other Costs & Benefits (Non-Monetized)	<p>Maintaining the status quo would result in non-monetized costs in the form of time and effort of VDSS staff in order to remain in compliance with unnecessary regulations.</p> <p>There are no non-monetized benefits associated with maintaining the status quo.</p>	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>The current regulation includes an obsolete DIBR and imposes multiple unnecessary requirements. Only a regulatory change can address these issues.</p> <ul style="list-style-type: none"> • Direct Costs: There are no monetizable direct costs associated with maintaining the status quo. • Indirect Costs: There are no monetizable indirect costs associated with maintaining the status quo. 	
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	<ul style="list-style-type: none"> • Direct Benefits: There are no monetizable direct benefits associated with maintaining the status quo. • Indirect Benefits: There are no monetizable direct benefits associated with maintaining the status quo. 	
(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)	<ul style="list-style-type: none"> • Direct Costs: There are no monetizable direct costs for local departments of social services (LDSS) associated with the regulatory action. • Indirect Costs: There are no monetizable indirect costs for LDSS associated with the regulatory action. • Direct Benefits: There are no monetizable direct benefits for LDSS associated with the regulatory action. • Indirect Benefits: There are no monetizable indirect benefits for LDSS associated with the regulatory action. 	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a)\$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	<p>The non-monetized benefit is removal of unnecessary requirements associated with the current DIBR. This reduces the time and effort required for the agency to remain in compliance with the regulation. Local departments of social services and applicants/recipients of TANF will have access to the accurate DIBR.</p> <p>There is no non-monetized cost for local partners associated with making these changes. The non-monetized benefit for local parents is the changes make the regulation more understandable.</p>	
(4) Assistance	N/A	
(5) Information Sources	N/A	

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>There are no monetizable direct or indirect costs and benefits for families.</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) \$0.00	(b) \$0.00
(3) Other Costs & Benefits (Non-Monetized)	<p>The non-monetized benefit for families is that the changes bring the code up to date and make it more understandable. There are no non-monetized costs for families associated with the action.</p>	

(4) Information Sources	N/A
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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>This action has no impact on small businesses.</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)\$0.00	(b) \$0.00
(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(s) 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
DIBR	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	2	0	+2
	(D/R):	682	0	680	-680
					(M/A):
					(D/A):
					(M/R):02
					(D/R):-680

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)

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 Word Count	New Word Count	Net Change in Word Count

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