

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22VAC30-20
VAC Chapter title(s)	<ul style="list-style-type: none"> • Guidance for the Provision of Community Support Services (ID: 5082) (delete) • Guidance for the Provision of Vocational Rehabilitation – Community Support Services (NEW) (replace)
Action title	Update the Guidance for the Provision of Community Support Services
Date this document prepared	August 7, 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 on the Guidance for the Provision of Community Support Services:

The Vocational Rehabilitation (VR) program is the largest program operated by the Department for Aging and Rehabilitative Services (DARS). The agency's Division of Rehabilitative Services (DRS) is responsible for administering the program, which provides VR services to individuals with disabilities to help them prepare for, secure, regain or retain employment. In some cases, Community Support Services (CSS) are required to establish VR program eligibility, assess rehabilitation and career needs, or achieve an employment outcome. CSS is provided through DARS' approved employment services organizations (ESO) vendors and may include education, life skills training, and assessment and instruction related to the use of assistive technology. Administration of the VR program and CSS services are directed heavily by federal statutory and regulatory requirements.

Background on the Guidance for the Provision of Community Support Services Changes:

The 2018 Guidance for the Provision of Community Support Services (CSS) contains outdated information and content that does not provide clear guidance for the appropriate use of CSS. DARS is seeking to delete the current Guidance for the Provision of Community Support Services (CSS) and replace it with a new document, Guidance for the Provision of Vocational Rehabilitation (VR) – Community Support Services (CSS).

Listed below is a summary of some of the key changes made to the updated CSS guidance:

1. I. Policy is clarified that CSS services described in the guidance document only apply to the VR program.
2. II. B - Definitions, clarifies DRS staff should save consumer CSS Plans in DocFinity.
3. II. C - Areas to Address by CSS are updated to include communication, interpersonal skills, mobility, self-care, self-direction, work skills, and work tolerance.
4. III Qualified Providers – This section is no longer needed and is deleted.
5. III.B – This applies the DRS informed choice policy to the provision of CSS.
6. IV. The role of the VR counselor is updated to include a more accurate list of services they coordinate with the VR consumer. In addition, the completion of a full CSS assessment can be waived with the approval of a VR supervisor.
7. V. Community Support Assessment/Service Plan is updated to now include Authorization of Referral and to increase the initial authorized amount of time a VR counselor is allotted from eight (8) to ten (10) hours. More than ten (10) hours of service must be approved by a VR supervisor and documented with an Actual Service Note (ASN) and authorization of more than six (6) months of services must be approved by a VR supervisor and documented with an ASN.
8. V. D. The list of CSS Plan elements is updated to match program practices and collect outcomes data.
9. VI. Modifying/Ending Services is updated to include that the CSS Plan may be amended at any time and to clarify reasons CSS may be terminated.
10. VIII. Program Approval is no longer needed and is deleted.
11. VIII. Reimbursement Rates is no longer needed and is deleted.

12. The entire document was reviewed and edited for clarity and compliance with federal and state VR regulations and policies.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>No new funding is needed to implement this change. Costs to implement this change can be absorbed with current funding.</p> <p>In FFY 2023, DARS spent \$863,717.67 on CSS. Funds for CSS are provided through existing VR program funding.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(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)	<p><u>Non-Monetized Direct Benefits:</u> Clarifying the purpose and standards for when CSS is needed and how it is utilized allows this limited resource to be used appropriately and efficiently to aid those VR consumers most in need.</p> <p><u>Non-Monetized Indirect Benefits:</u> Ensuring the guidance for the provision of CSS filed on the Town Hall website is updated and consistent with current state law, federal law, and DRS procedures provides DRS staff, service partners, the public, and stakeholders with clear and accessible information. This advances ORM’s goals of streamlined access and transparency.</p>	
(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 document is not updated on Town Hall to reflect current practices and regulations, it has the potential to create confusion among VR 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)	There are no alternatives that result in updating this existing guidance document. 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)	There are no local partners impacted by this guidance document. 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)	Direct Costs: \$0 Indirect Costs: \$0
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Benefits (Monetized)	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)	Receiving VR services that include CSS can be life changing for individuals with disabilities and their families. For some VR consumers, the addition of CSS is needed to achieve the ultimate goal of becoming employed or staying employed. Employment allows consumers to integrate into their communities and support independence.	
(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>No new funding is needed to implement this change. Costs to implement this change can be absorbed with current funding.</p> <p>DRS maintains relationships with approximately 56 ESOs that provide CSS to VR consumers. The majority, if not all, of the ESOs are small businesses.</p> <p>In FFY 2023, DARS spent \$863,717.67 on CSS. Funds for CSS are provided through existing VR program funding.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	The clarification on allowable hours of service provided to each VR consumer as well as clarification on how CSS will be used under the VR program will improve service delivery by ESOs and allow them to plan and use their resources more efficiently.	
(4) Alternatives	N/A	
(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:				

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

Guidance for the Provision of Community Support Services	6 pages 2,190	0 (deleted)	-6 pages -2,190 words
Guidance for the Provision of Vocational Rehabilitation – Community Support Services	0 pages	2024 version (to be directly filed on Town Hall): 4 pages 1,679 words	4 pages 1,679 words
Net Changes	0 pages	4 pages	-2 pages -511 words