

Office of Regulatory Management
Economic Review Form

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|---------------------------------------------------------------|-----------------------------------------------------------------------------|
| Agency name | Virginia Department of Behavioral Health and Developmental Services (DBHDS) |
| Virginia Administrative Code (VAC) Chapter citation(s) | 12 VAC 35-250 |
| VAC Chapter title(s) | Peer Recovery Specialists |
| Action title | Periodic Review |
| Date this document prepared | 3/20/2023 |

Cost Benefit Analysis

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

Omitted based on guidance from the ORM Regulatory Economic Analysis Manual (p. 3).

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

Omitted based on guidance from the ORM Regulatory Economic Analysis Manual (p. 3).

Table 1c: Costs and Benefits under an Alternative Approach

Omitted based on guidance from the ORM Regulatory Economic Analysis Manual (p. 3).

Impact on Local Partners

Table 2: Impact on Local Partners

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|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| (1) Direct Costs & Benefits | <p>Community service boards (CSBs) are the primary local partners impacted by 12VAC35-250. The decision to retain this regulatory chapter as is currently written would likely provide an economic benefit to CSBs. This chapter was established in the 2016 General Assembly pursuant to Item 311.B. of Chapter 780 of the 2016 Acts of Assembly and by Chapters 418 and 426 of the 2017 Acts of Assembly, which directed the State Board of Behavioral Health and Developmental Services to promulgate emergency regulations including definitions and requirements for an individual to be become professionally qualified to be a peer recovery specialist (PRS). The emergency regulation became effective on May 12, 2017, and the current permanent regulation became effective on March 6, 2019.</p> <p>Any cost impact of this regulation is expected to be outweighed by the economic benefit of superior outcomes of substance use disorder treatment and eligibility to receive the recently established Virginia Medicaid Addiction and Recovery Treatment Services (ARTS) substance use disorder benefit.</p> |
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| | Additionally, CSBs will benefit from continuity of the requirements as it will ensure consistency of Medicaid billing for ARTS services provided by or with the support of, PRSs. |
| (2) Quantitative Factors | Estimated Dollar Amount |
| Direct Costs | (a) \$0 |
| Direct Benefits | (b) \$0 |
| (3) Indirect Costs & Benefits | |
| (5) Assistance | |
| (6) Optional | |

Economic Impacts on Families

Table 3: Impact on Families

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| (1) Direct Costs & Benefits | This regulatory action is not expected to result in any economic cost to Virginia families. Family members requiring treatment for substance use disorder will likely be positively impacted by this regulation, as peer-delivered services have demonstrated superior outcomes, including decreased substance abuse, greater engagement of clients, and reduced rates of hospitalization. ¹ Improved treatment outcomes positively benefit families by minimizing disruptions to work and family life that may occur when additional treatment is required for an individual to reach recovery. |
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¹ Rowe M., C. Bellamy et al. 2007. Reducing alcohol use, drug use, and criminality among persons with severe mental illness: outcomes of a Group- and Peer-Based Intervention. *Psychiatric Services* 58:955-61.

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|-------------------------------|-------------------------|
| (2) Quantitative Factors | Estimated Dollar Amount |
| Direct Costs | (a) \$0 |
| Direct Benefits | (b) \$0 |
| (3) Indirect Costs & Benefits | |
| (4) Information Sources | |
| (5) Optional | |

Impacts on Small Businesses

Table 4: Impact on Small Businesses

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| (1) Direct Costs & Benefits | Small businesses impacted by this regulation are providers of SUD services who meet the definition of small business as defined in the Code of Virginia § 2.2-4007.04. Similar to local partners (CSBs), the decision to retain the regulation as currently written would likely provide an economic benefit to providers as it would ensure continuity for PRS' already working in the role. Additionally, the continuation of this regulation ensures that providers are aligned with federal requirements that allow providers to receive Medicaid funding for providing peer recovery services when the PRS is registered with the Board of Counseling as an RPRS per 18VAC115-70. |
| (2) Quantitative Factors | Estimated Dollar Amount |
| Direct Costs | (a) \$0 |
| Direct Benefits | (b) \$0 |
| (3) Indirect Costs & Benefits | |

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|-------------------------|--|
| (4) Alternatives | |
| (5) Information Sources | |
| (6) Optional | |

Changes to Number of Regulatory Requirements

For each individual VAC Chapter amended, repealed, or promulgated by this regulatory action, list (a) the initial requirement count, (b) the count of requirements that this regulatory package is adding, (c) the count of requirements that this regulatory package is reducing, (d) the net change in the number of requirements. This count should be based upon the text as written when this stage was presented for executive branch review. Five rows have been provided, add or delete rows as needed.

Table 5: Total Number of Requirements

| | Number of Requirements | | | |
|----------------|------------------------|-----------|--------------|------------|
| Chapter number | Initial Count | Additions | Subtractions | Net Change |
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This is an analysis of the current regulation following periodic review. The regulation will be retained as is.