



## **Economic Impact Analysis Virginia Department of Planning and Budget**

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### **6 VAC 35-60 – Minimum Standards for the Virginia Delinquency Prevention and Youth Development Act Grant Programs**

**Department of Juvenile Justice**

March 20, 2009

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### **Summary of the Proposed Amendments to Regulation**

The Board of Juvenile Justice (Board) proposes to amend its regulations governing delinquency prevention programs. Specifically, the Board proposes to update language in these regulations as well as revise a requirement that recipients of grant funds submit comprehensive program plans annually. The Board also proposes to allow greater flexibility for localities to complete needs assessments in the required four year cycle.

### **Result of Analysis**

The benefits likely exceed the costs for all proposed changes.

### **Estimated Economic Impact**

To account for legislative changes that have occurred since these regulations were last reviewed in 2002 and to clarify some regulatory provisions; the Board proposes to update definitions and regulatory language with this proposed action. For instance, the Board proposes to remove language that required the Office of youth to have a paid, full-time director because this language might be incorrectly interpreted as requiring that this person *only* supervise delinquency prevention programs. This deletion will clear up confusion on this point while still insuring proper staffing of programs under another provision of these regulations. Regulated entities are very unlikely to incur any additional costs on account of the amendments that the Board proposes to clarify/update provisions of these regulations. To the extent that regulatory language was unclear about Board expectations, regulated entities will benefit from these regulatory changes.

In addition to clarifying changes, the Board proposes two substantive changes that will allow regulated entities greater flexibility in meeting the requirements of these regulations.

Current regulations require recipients of grant funds to annually submit a comprehensive written plan that lists the goals and objectives of grant funded programs and also assesses the needs of the community in which these programs are implemented. The Board proposes to amend this requirement so that comprehensive written plans will only be submitted biennially; a status report that assesses youth and parenting programs available in localities and explains any changes that are planned for programs covered by grant funds will be submitted annually. This proposed change will likely decrease the resources that recipients of grant monies will have to expend on gathering and compiling information for the required comprehensive plan that will now only have to be submitted every other year. Since the newly required annual update requires less information to be submitted, grant recipients will likely save money, time and staff resources under the proposed regulations.

Current regulations also require localities to assess community youth needs with an assessment list with four component parts; current regulations require localities to assess at least one of these components each year so that a complete assessment is completed every four years. The Board proposes to allow localities greater flexibility in completing their task by requiring at least two of the required components be assessed every two years. Localities will still have to complete all portions of a youth needs assessment every four years but will likely benefit from the greater flexibility to complete this assessment in a more efficient manner.

### **Businesses and Entities Affected**

The Department of Juvenile Justice (DJJ) reports that these proposed regulations will affect any localities that apply for, and receive, grant funds through these programs. Because these programs have not been funded since 2003, no localities are currently affected.

### **Localities Particularly Affected**

No locality will be disproportionately affected by this proposed regulatory action.

### **Projected Impact on Employment**

This regulatory action will likely have no impact on employment in the Commonwealth.

## **Effects on the Use and Value of Private Property**

This regulatory action will likely have no effect on the use or value of private property in the Commonwealth.

## **Small Businesses: Costs and Other Effects**

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

## **Small Businesses: Alternative Method that Minimizes Adverse Impact**

Small businesses in the Commonwealth are unlikely to incur any costs on account of this regulatory action.

## **Real Estate Development Costs**

This regulatory action will likely have no effect on real estate development costs in the Commonwealth.

## **Legal Mandate**

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 36 (06). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. Further, if the proposed regulation has adverse effect on small businesses, Section 2.2-4007.H requires that such economic impact analyses include (i) an identification and estimate of the number of small businesses subject to the regulation; (ii) the projected reporting, recordkeeping, and other administrative costs required for small businesses to comply with the regulation, including the type of professional skills necessary for preparing required reports and other documents; (iii) a statement of the probable effect of the regulation on affected small businesses; and (iv) a description of any less intrusive or less costly alternative methods of achieving the purpose of the

regulation. The analysis presented above represents DPB's best estimate of these economic impacts.