

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department of Health
Virginia Administrative Code (VAC) Chapter citation(s)	12 VAC 5-402
VAC Chapter title(s)	Certification of Community Health Workers
Action title	Adopt regulations setting forth the requirements for community health worker certification
Date this document prepared	7/17/2023
Regulatory Stage (including Issuance of Guidance Documents)	Proposed

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)

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: The projected direct monetized cost for each individual is approximately \$100 per application for community health worker certification.</p> <p>Indirect Costs: There are no monetized indirect costs associated with the proposed regulations.</p> <p>Direct Benefits: There are no direct monetized benefits associated with the proposed regulations.</p> <p>Indirect Benefits: There are no indirect monetized benefits associated with the proposed regulations.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$100	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	<p>There are no non-monetized costs for the proposed regulations.</p> <p>The non-monetized benefits of the proposed regulations are that qualified individuals will provide collaborative services to assist individuals in achieving sustained wellness by engaging, educating, supporting, and advocating on behalf of an individual's efforts to meet the goals established in a plan of care. Healthcare providers, community-based organizations and payers may be assured of standardized training requirements when vetting this critical workforce. The public registry will include all community health workers certified in Virginia and will make identification of certified community health workers easier and more accessible to the public.</p>	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>This will be the initial promulgation of the chapter and is intended to meet the mandate in § 32.1-15.1, thus the status quo of no regulatory structure is not a viable option to assess. Thus, there are no monetized direct or indirect costs or benefits associated.</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)	There are no non-monetized costs or benefits under the Status Quo.	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	The regulation in this action is mandated by § 32.1-15. The requirements in the regulation represent the consensus of extensive stakeholder engagement as the least burdensome approach to accomplish the legislative mandate and ensure that certified CHWs meet a consistent set of requirements. Additional requirements, such as increased training or education hour requirements to be eligible to be certified or additional requirements on certifying bodies or training entities to be approved were considered, but are not included in these proposed regulations. The monetized costs would be higher under such alternatives, seen as potential delayed wage increases that a CHW may receive after certification, higher costs to attend training programs if the entity had to deliver a lengthier course or one meeting additional requirements imposed by the Board.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) undetermined	(b) 0
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	While increased training or education hour requirements may increase the knowledge and experience of a certified CHW applicant, but the non-monetized cost of the increased regulatory burden would not outweigh any incremental benefit associated, as the current standards are sufficient to ensure properly trained certified CHWs.	
(5) Information Sources		

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 direct or indirect monetized costs or benefits to local partners associated with this change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>There are no non-monetized costs associated with this regulatory action.</p> <p>This regulatory change is intended to improve the health and well-being of individuals in Virginia through community-based collaborative services. This change is also intended to help eliminate health disparities across the Commonwealth. Localities, such as local health departments, social services agencies, mental and behavioral health services, or other locality-administered entities who hire certified CHWs would benefit from the certification of their knowledge, skills, and abilities.</p>	
(4) Assistance	No assistance needed.	
(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)	There are no direct or indirect monetized costs or benefits to families associated with this change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>There are no non-monetized costs to families associated with the proposed change.</p> <p>The non-monetized benefits of the proposed regulations include that qualified individuals will provide collaborative services to assist families in achieving sustained wellness by engaging, educating, supporting, and advocating on behalf of an individual's efforts to meet the goals established in a plan of care.</p>	
(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)	There are no monetized direct or indirect costs or benefits to small businesses associated with this regulatory action.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>There are no non-monetized costs to small businesses associated with this regulatory action.</p> <p>Healthcare providers and community-based organizations of any size may be assured of standardized training requirements when vetting this critical workforce. The public registry will include all community health workers certified in Virginia and will make identification of certified community health workers easier and more accessible to employers.</p>	
(4) Alternatives		
(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
12.5.402.10	Statutory:	0	0		0
	Discretionary:	0	0		0
12.5.402.20	Statutory:	0	2 (R/S)		+2
	Discretionary:	0	0		0
12.5.402.30	Statutory:	0	0		0
	Discretionary:	0	6 (R/D)		+6
12.5.402.40	Statutory:	0	1 (G/S) 3 (R/S)		+4
	Discretionary:	0	4 (R/D)		+4
12.5.402.50	Statutory:	0	1 (R/S)		+1
	Discretionary:	0	7 (R/D)		+7