

Office of Regulatory Management
Economic Review Form

Agency name	Department of Social Services
Virginia Administrative Code (VAC) Chapter citation(s)	_ VAC __ - ____
VAC Chapter title(s)	N/A
Action title	Child and Family Services Manual, Chapter E: Foster Care
Date this document prepared	May 24, 2024
Regulatory Stage (including Issuance of Guidance Documents)	

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>Direct Costs: The proposed guidance change will not increase state or local costs nor require any state or local expenditure beyond what was currently appropriated. The following are the proposed guidance changes: 1. Expand the population of youth that the Local Departments of Social Services (LDSS) will need to report when missing to include Fostering Futures youth and Chafee eligible youth who are no longer in foster care 2. Enhance the information that the LDSS should provide to law enforcement and the National Center for Missing and Exploited Children (NCMEC) when reporting a youth in foster care missing. 3. Include that the LDSS should maintain regular communication with NCMEC during the period that the child or youth is missing from care. 4. Provide resources and information to the LDSS about resources available to assist the agencies in developing a plan to ensure necessary action is taken when a child or youth initially goes missing, data pertaining to the prevalence of trafficking amongst foster youth. These changes are necessary to ensure compliance with federal requirements (Public Law 113-183) and enhance practice.</p> <p>DSS will be placed on a federal title IV-E program improvement plan until these changes are made. Failure to complete these changes would significantly increase state and local costs if Virginia does not comply with the program improvement plan.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: The proposed change will meet the federal mandate for state title IV-E agencies. These proposed changes will not require any future state regulatory action.</p> <p>Indirect Benefits: The primary indirect benefit will be that the guidance will conform to law, regulation, and best practice.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) N/A</p>	<p>(b) N/A</p>
<p>(3) Net Monetized Benefit</p>	<p>N/A</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>No other costs or benefits.</p>	

(5) Information Sources	N/A
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Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	There would be direct and indirect costs for not changing the guidance to match the law, regulation, and best practices. Virginia would continue to be out of compliance with federal law and could face fiscal sanctions. It would not be beneficial to maintain the status quo of this written practice guidance.	
(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)	No other costs or benefits.	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A	
(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)	No other costs or benefits.	
(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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>The direct impact to local partners is associated with the guidance change needed because of the federal requirement (Public Law 113-183). The proposed change will require local departments of social services (LDSS) to notify the National Center for Missing and Exploited Children and law enforcement when there is a Fostering Futures youth or a Chafee eligible youth who is no longer in care missing. The proposed change also requires the LDSS to share a recent photo of the missing or abducted youth and report endangerment information including the youth’s pregnancy status, suicidal tendencies, vulnerability to being sex trafficked, other health risk factors. This proposed change aligns with current written practice guidance that requires LDSS to identify, document, and determine appropriate services for children and youth at risk of sex trafficking.</p> <p>Direct Costs: The proposed guidance change will not increase state or local costs nor require any state expenditure beyond what was currently appropriated.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: The proposed change will meet the federal mandate for state title IV-E agencies. These proposed changes will not require any future state regulatory action.</p> <p>Indirect Benefits: The primary indirect benefit will be that the guidance will conform to law, regulation, and best practice.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) N/A</p>	<p>(b) N/A</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>No other costs or benefits.</p>	
<p>(4) Assistance</p>	<p>N/A</p>	
<p>(5) Information Sources</p>	<p>N/A</p>	

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>Direct Costs: None. Indirect Costs: None. Direct Benefits: The proposed change will meet the legal mandate of state law, regulation, and best practice for serving children and youth at risk of sex trafficking. Indirect Benefits: The primary indirect benefit will be that the guidance will conform to law, regulation, and best practice for serving children and youth at risk of sex trafficking.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	No other costs or benefits.	
(4) Information Sources	N/A	

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)	The proposed changes do not directly or indirectly impact costs and benefits for small businesses.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	No other costs or benefits.	

(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
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
Grand Total of Changes in Requirements:					(M/A):
					(D/A):
					(M/R):
					(D/R):

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
Missing children or youth from foster care	1,985	2,238	253

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