

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	State Board of Social Services
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	22VAC40-880
<b>VAC Chapter title(s)</b>	Child Support Enforcement Program
<b>Action title</b>	Implementation of Periodic Review Implementation
<b>Date this document prepared</b>	August 27, 2023
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Fast-Track

**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>The Department of Social Services (DSS) anticipates that there are no direct or indirect costs or benefits to the regulatory action. The action makes technical changes based on a prior periodic review filed in 2018 (<a href="#">link</a>).</p> <p>Direct Costs: There are no direct monetized costs of the proposed change.</p> <p>Indirect Costs: There are no indirect monetized costs of the proposed change.</p> <p>Direct Benefits: There are no direct monetized benefits of this proposed change here.</p> <p>Indirect Benefits: There are no indirect monetized benefits of this proposed change.</p>	
(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)	Parents, courts, and DSS will benefit from increased clarity. Clear regulations also support participants in understanding their rights and responsibilities.	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct, quantifiable monetized costs with maintaining the status quo.</p> <p>Indirect Costs: There are no indirect monetized costs with maintaining the status quo.</p> <p>Direct Benefits: There are no direct monetized benefits with maintaining the status quo.</p> <p>Indirect Benefits: There are no indirect monetized benefits with maintaining the status quo.</p>	
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(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)	N/A	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct monetized costs to an alternative approach. For Section 240, changes are mandatory per federal regulations. A failure to make the mandatory change to Section 240 could result in noncompliance for Virginia, loss of IV-D funds, and sanctions to the TANF fund. For other sections, changes are technical amendments. Failing to make the updates would have no direct cost but would also leave outdated text.</p> <p>Indirect Costs: There are no indirect monetized costs to an alternative approach.</p> <p>Direct Benefits: There are no direct monetized benefits to an alternative approach.</p> <p>Indirect Benefits: There are no indirect monetized benefits to an alternative approach.</p>	
(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)	N/A	

(5) Information Sources	N/A
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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)	Direct Costs: There are no direct monetized costs. Indirect Costs: There are no indirect monetized costs. Direct Benefits: There are no direct monetized benefits. Indirect Benefits: There are no indirect monetized benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	Local partners may benefit from the improved clarity of the regulation.	
(4) Assistance	N/A	
(5) Information Sources	Not applicable. There are no monetized costs or benefits directly associated with the regulation.	

**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: There are no direct monetized costs to families. Indirect Costs: There are no indirect monetized costs to families. Direct Benefits: There are no direct monetized benefits to families.
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	Indirect Benefits: There are no indirect monetized benefits to families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>Technical amendments may improve clarity for families reading the regulation. In revised Section 240, use of more specific factors when imputing a child support obligation (in the absence of income history) could, depending on that parent’s specific circumstances lead to an increase or decrease in the ordered amount. It is speculative to consider what circumstances parents may present and what the overall impact would be. VDSS is working with its Office of Research and Planning to develop a study on the economic circumstances affecting Virginia’s families with respect to the child support guidelines; however, VDSS does not have data at this point.</p>	
(4) Information Sources	Not applicable. There are no monetized costs or benefits directly associated with the regulation.	

**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>Direct Costs: There are no direct monetized costs that will impact small businesses.</p> <p>Indirect Costs: There are no indirect monetized costs that will impact small businesses.</p> <p>Direct Benefits: There are no foreseen direct monetized benefits that will impact small businesses.</p> <p>Indirect Benefits: There are no foreseen indirect monetized benefits that will impact small businesses.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Alternatives	None of which we are aware.	
(5) Information Sources	Not applicable. There are no monetized costs or benefits directly associated with the regulation.	

## 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
10	Statutory: <sup>1</sup>	0	0	0	0
	Discretionary:	0	0	0	0
90	Statutory:	4	0	0	0
	Discretionary:	0	0	0	0
240	Statutory:	0	2	0	+2
	Discretionary:	6	0	2	-2
250	Statutory:	4	0	0	0
	Discretionary:	2	0	0	0
320	Statutory:	0	0	0	0
	Discretionary:	2	0	2	-2
350	Statutory:	0	0	0	0
	Discretionary:	9	0	0	0
430 <sup>2</sup>	Statutory:	1	0	1	-1
	Discretionary:	2	0	1	-1
480	Statutory:	0	0	0	0
	Discretionary:	1	0	1	-1

### *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

<sup>1</sup> Based on page 2 of the *Regulatory Reduction Guide*, this document considers “statutory” to include any mandate, including federal regulations and federal or state court orders.

<sup>2</sup> The recent Notice of Periodic Review for this section indicated 4 in its count. Further review indicates one item was “elaboration” per the *Regulatory Reduction Guide*.

*Length of Guidance Documents (only applicable if guidance document is being revised)*

<b>Title of Guidance Document</b>	<b>Original Length</b>	<b>New Length</b>	<b>Net Change in Length</b>