

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	Department for Aging and Rehabilitative Services
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	22VAC 30-20 22 VAC 30-30
<b>VAC Chapter title(s)</b>	Provision of Vocational Rehabilitation Services Provision of Independent Living Rehabilitation Services
<b>Action title</b>	The Virginia Assistive Technology (VATS) State Plan FFY2024 – 2026
<b>Date this document prepared</b>	September 12, 2024
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Guidance Document Update

**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.

**Background:** The Virginia Assistive Technology System (VATS) is a statewide program authorized and funded by the 21st Century Assistive Technology Act (known as the AT Act). The Virginia Department for Aging and Rehabilitative Services (DARS) administers Virginia’s AT Act program, VATS. The Administration for Community Living (ACL), Office of Interagency Innovation, oversees the State Grant for Assistive Technology Act Program, under the AT Act, which supports grants to states to address the AT needs of individuals with disabilities by increasing awareness of and access to AT devices and services that can help with education, employment, daily activities, and inclusion in the community. The AT Act requires states to submit an application in the form of a three-year AT State Plan, which describes how states will implement their AT programs. Virginia must have a federally-approved AT State Plan to receive federal funding that directly supports the provision of AT devices and services to Virginia residents. In FFY 2023, Virginia received \$607,096 in federal funding through the AT Act. DARS is responsible for drafting Virginia’s AT State Plan.

ACL released a new web-based tool in August (ahead of the October 1 submission deadline), that states are required to use to create and submit their AT State Plans. Changes in the VATS State Plan for FFY 2024-2026 include updates to:

- DARS’ current contact information and VATS Advisory Council composition
- Device Refurbish and Reassignment
- Short-Term Device Loan
- Device Demonstrations
- Training including a collaboration with Apple Government to provide a series of handheld accessibility trainings for the DARS vocational rehabilitation (VR) staff and the VATS Advisory Council on accessibility features built into Apple devices
- Technical Assistance to include continuing to work with the Virginia No Wrong Door program to improve system capacity, which will improve access to and acquisition of assistive technology devices and services
- Public awareness to include continuing to collaborate with the state’s VR program to promote National AT Awareness Day through social media and make resources available through a dedicated phone line and website.
- Conduct outreach to and, as appropriate, collaborate with other state agencies that receive federal funding for AT.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0  Indirect Costs: \$0  Direct Benefits: The new AT State Plan ensures DARS can continue to receive federal funding to support the provision of AT devices and services to Virginians with disabilities. In FFY 2023, Virginia received \$607,096 in federal funding through the AT Act.
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	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$607,096 annually in federal funds
(3) Net Monetized Benefit	\$607,096 annually in federal funds	
(4) Other Costs & Benefits (Non-Monetized)	Ensuring that the AT State Plan filed on the Town Hall website is updated and consistent with the one for ACL’s approval provides the public and stakeholders with a clear and publicly accessible location for the AT State Plan. Ensuring the public and other key stakeholders can access and easily locate the current AT State Plan on the DARS website and on the Virginia Town Hall website advances ORM’s goals of streamlined access and transparency.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: If the new AT State Plan is not approved and submitted for federal approval, Virginia risks losing \$607,096 annually in federal funds for AT devices and services.  Indirect Costs: \$0  Direct Benefits:  Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$607,096 annually in federal funds	(b) \$0
(3) Net Monetized Benefit	-\$607,096	
(4) Other Costs & Benefits (Non-Monetized)	If the AT State Plan is not updated on Town Hall to match the one that is submitted to ACL, the AT State Plan filed on Town Hall will be outdated and inaccurate. In addition, it means that the public and stakeholders do not have a clear and publicly accessible location for the AT State Plan. Ensuring the public and other key stakeholders can access and easily	

	locate the current AT State Plan on the DARS website and on the Virginia Town Hall website advances ORM’s goals of streamlined access and transparency.
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>There are no alternative approaches. There are not alternative approaches. A new AT State Plan is required by federal law with federal funding contingent on a new AT State Plan.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</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)	N/A	
(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)	<p>There is no impact on local partners. Direct Costs: \$0</p> <p>Indirect Costs: \$0</p>
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	Direct Benefits: \$0	
	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance		
(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)	Direct Costs: \$0  Indirect Costs: \$0  Direct Benefits: Receiving AT devices and services can be life changing for individuals with disabilities and their families, ensuring that individuals can continue to live in their homes, achieve employment, and be fully integrated into their communities.  If the AT State Plan is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing these federal funds which provide AT devices and services to Virginians with disabilities.  Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$607,096 annually in federal funds
(3) Other Costs & Benefits (Non-Monetized)	Ensuring that the AT State Plan filed on the Town Hall website is updated and consistent with the one for ACL’s approval provides the public and stakeholders with a clear and publicly accessible location for the AT State Plan. Ensuring the public and other key stakeholders can access and easily locate the current AT State Plan on the DARS website and on the Virginia Town Hall website advances ORM’s goals of streamlined access and transparency.	
(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)	<p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: DARS contracts with two non-profit organizations, which are most likely considered small business, that depend on this partnership to provide services to Virginia residents. The ongoing receipt of federal funds for AT devices and services will ensure that these two non-profit organizations can continue to partner with DARS to provide AT devices and services to Virginians with disabilities.</p> <p>Indirect Benefits: Non-profit organizations supplement the funding they receive through this program with private donations, and other grant opportunities. Ensuring these organizations have ongoing program funding preserve continuity of operations and maximize all the funding they are eligible to receive.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$607,096 annually in federal funds

<p>(3) Other Costs &amp; Benefits (Non-Monetized)</p>	<p>Ensuring that the AT State Plan filed on the Town Hall website is updated and consistent with the one for ACL’s approval provides the public and stakeholders with a clear and publicly accessible location for the AT State Plan. Ensuring the public and other key stakeholders can access and easily locate the current AT State Plan on the DARS website and on the Virginia Town Hall website advances ORM’s goals of streamlined access and transparency.</p>
<p>(4) Alternatives</p>	<p>There are no alternative approaches. There are not alternative approaches. A new AT State Plan is required by federal law with federal funding contingent on a new AT State Plan.</p>
<p>(5) Information Sources</p>	

**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):				
<b>Grand Total of Changes in Requirements:</b>					(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)*

<b>Title of Guidance Document</b>	<b>Original Word Count</b>	<b>New Word Count</b>	<b>Net Change in Word Count</b>
VATS Plan FY 2021 – 2023 - <b>DELETE</b>	3,771 words 28 pages		
VATS Plan FY 2024-2026 - <b>ADD</b>		3,804 words 28 pages	
<b>Net Change</b>			+33 words 0 pages

**NOTE:** In developing the AT State Plan, DARS must conform to federal requirements for the AT State Plan structure, organization, and content. There is little opportunity for variability in this federally-required AT State Plan. The increased length for the next AT State Plan is unavoidable.

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