# Office of Regulatory Management

#### **Economic Review Form**

Agency name	Virginia Department of Health		
Virginia Administrative	12VAC 5-191-190		
Code (VAC) Chapter			
citation(s)			
VAC Chapter title(s)	Care Connection for Children Pool of Funds		
Action title	Amend		
Date this document	12/20/2023		
prepared			
Regulatory Stage	Amend existing guidance document		
(including Issuance of			
<b>Guidance Documents)</b>			

#### **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)** 

Tubic fui Costs und	Denemes of the Froposcu Ci	ianges (i i imary Option)	
(1) Direct & Indirect Costs & Benefits (Monetized)	This action is to amend the Care Connection for Children (CCC) Pool of Funds (POF) Guidelines. The existing guidance document describes the CCC Network and the CCC POF, and outlines eligibility requirements for CCC services and for accessing the CCC pool of funds. The proposed minor changes add language to clarify eligibility for CCC services, remove redundancies in language to clarify eligibility for the CCC POF based on health insurance, and clarify the process for client requests not covered by the POF guidelines. The proposed updates to the guidance document do not change the existing eligibility requirements, but rather clarify these requirements for families and other CCC stakeholders.  Direct Costs: There are no monetized direct costs associated with this action.  Indirect Costs: There are no monetized indirect costs associated with this action.  Indirect Benefits: There are no monetized indirect benefits associated with this action.  Indirect Benefits: There are no monetized indirect benefits associated with this action.		
(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 associated with the proposed changes in the guidance document. The non-monetized benefit of the proposed changes to the guidance document is a greater understanding among stakeholders (particularly among CCC network partners and families) of the current eligibility requirements for CCC services and the CCC POF. Clearer eligibility requirements will help ensure that eligible Virginia children are more likely to get the medications they need and are less likely to end up in the hospital in crisis.		
(5) Information Sources	The proposed changes were primarily recommended by stakeholders and staff of the Care Connection for Children Network. Staff consist of center directors, at least one parent who has a child with special health care needs, and several of the physician advisors that serve each center. These stakeholders provide care coordination or case management services for VDH. Some staff are nurses and some are social workers.		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no monetized direct costs associated with this action.  Indirect Costs: There are no monetized indirect costs associated with this action.  Direct Benefits: There are no monetized direct benefits associated with this action.		
	Indirect Benefits: There are no monetized indirect benefits associated with this action.		
(2) Present			
Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits	
	(a) \$0	(b) \$0	
(3) Net Monetized	\$0		
Benefit			
(4) Other Costs & Benefits (Non-Monetized)	Failure to update the guidance document could result in a lack of clarity among families, partners implementing the program, and other stakeholders about eligibility requirements for CCC services and the CCC POF. Clarity is necessary to ensure that as many eligible families as possible receive life preserving medications for their children.		
(5) Information Sources	Stakeholder input		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	N/A – the alternative approach would be to maintain the status quo, and not update the guidance document to provide more clarity on eligibility requirements. See Table 1b.		
(2) -			
(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 &	N/A
Benefits (Non-	
Monetized)	
(5) Information	N/A
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)	Direct Costs: There are no monetized direct costs for local partners associated with this action. Costs will remain the same.  Indirect Costs: There are no monetized indirect costs for local partners associated with this action.  Direct Benefits: There are no monetized direct benefits for local partners associated with this action.  Indirect Benefits: There are no monetized indirect benefits for local partners associated with this action.		
(2) Present Monetized Values	Direct & Indirect Costs (a) \$0	Direct & Indirect Benefits (b) \$0	
(3) Other Costs & Benefits (Non- Monetized)	There are no non-monetized costs associated with the proposed changes in the guidance document. The non-monetized benefit of the proposed changes to the guidance document is a greater understanding among local partners implementing the program of the eligibility requirements and process for addressing a client request that is not included in the guidelines.		
(4) Assistance	No assistance to local partners is required as result of amending the guidance document.		
(5) Information Sources	Stakeholder input.		

## **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** 

Table 5: Impact on			
(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no monetized direct costs for families associated with this action.  Indirect Costs: There are no monetized indirect costs for families associated with this action.  Direct Benefits: There are no monetized direct benefits for families associated with this action.  Indirect Benefits: There are no monetized indirect benefits for families associated with this action.		
(2) Present			
Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits	
	(a) \$0	(b) \$0	
(3) Other Costs & Benefits (Non-Monetized)  (4) Information	There are no non-monetized costs associated with the proposed changes in the guidance document. The non-monetized benefit of the proposed changes to the guidance document is that families will have a clearer understanding of whether or not they are eligible for the CCC pool of funds. This in turn will help ensure that more eligible families receive life preserving medications for their children that they otherwise would not have been able to afford. The proposed updates to the guidance document do not change whether or not a family is eligible for the program, but simply clarify existing eligibility requirements.  Stakeholder input		
Sources	Stakenorder input		

## **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 &	Direct Costs: There are no monetized direct costs for small businesses
Indirect Costs &	associated with this action.
Benefits	
(Monetized)	Indirect Costs: There are no monetized indirect costs for small businesses
	associated with this action.

	Direct Benefits: There are no monetized direct benefits for small businesses associated with this action.  Indirect Benefits: There are no monetized indirect benefits for small businesses associated with this action.		
(2) Present Monetized Values	Direct & Indirect Costs (a) \$0	Direct & Indirect Benefits (b) \$0	
(3) Other Costs & Benefits (Non- Monetized)	There are no non-monetized costs or benefits associated with these changes for small businesses, as this program does not involve or affect small businesses.		
(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.

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

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Title of Guidance	Original Length	New Length	Net Change in
Document			Length
Children with Special	7 pages	7 pages	0
Health Care Needs			
Pool of Funds			
Guidelines			
Care Connection for			
Children			

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