

Office of Regulatory Management
Economic Review Form

Agency name	Department of Social Services
Virginia Administrative Code (VAC) Chapter citation(s)	N/A
VAC Chapter title(s)	N/A
Action title	Child Support Enforcement Guidance Document Update
Date this document prepared	March 27, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Updated Guidance Document for Publication

Cost Benefit Analysis

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: No direct cost of the proposed changes:</p> <ul style="list-style-type: none"> • Updated to remove the notarization requirement for the Affidavit of Nondisclosure. An estimation of an upper bound of the cost savings to the public is around \$18,000. This is based on the number of Affidavit of Disclosures completed during previous year at the \$5 non-electronic notarization rate. • Updated to clarify who may be present during an interview and provide procedures for the Incident Alert Indicator. • Updated to add what the effective date is of a modified ASO when the CP is deceased or cannot be located on an ARRP case. • Updated to clarify what should be used to verify paternity disposition for a child. • Updated to clarify that the Division does not collect or enforce orders that are for expenses that were incurred prior to the birth of a child. • Updated to add that the requesting party has 15 calendar days to provide proof of a change in circumstances for a special circumstance review. • Updated to include Section I Tribunal Communication and Cooperation. Updated form name to Order to Withhold Addendum Limited Services Case. • Updated to clarify that the same process is used for State Tax Refund, Lottery Winnings and Vendor Payment Intercept.
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- Updated to change unit name from Central Registry to the Financial Response Team.
- Updated to add, delete, or clarify various documents and their purposes.

Direct Benefits: These updates do not have any financial impact nor monetizable benefits associated with the update/change. This is informational to bring clarity to the guidance for Field staff to follow.

Indirect Costs: \$0

Indirect Benefits: \$0

Indirect Costs:

- Updated to clarify what amount should be used for an arrears payment for other states' orders.
- Updated to clarify how to determine the monthly payment amount for the Payment Agreement.
- Updated to add vendor payment to the State Income Tax/Lottery Winnings Intercept Notification and clarify that the SDU does not manually generate the Vendor Payment Intercept Notification.
- Updated to refer Division staff to Reporting the NCP to Consumer Credit Reporting Agencies section of the Program Manual for more information.
- Updated to add processes for when the Division has lost contact with a CP or the CP is deceased on an ARRP case and a review is being conducted.
- Updated to clarify what actions may be appealed.
- Updated to clarify that the NCP may contest the arrearages within 30 days from receipt of the Pre-Offset Notice by requesting an administrative appeal.
- Tax/Lottery Winnings Intercept Notification; updated to add vendor payment to the State Income Tax/Lottery Winnings Intercept Notification.
- Indirect Costs: May vary depending on administrative cost and legal costs.

Direct Benefits:

- Updated to include support orders that do not separate expenses that were incurred prior to the birth of a child from pregnancy and delivery expenses should be referred to Legal Counsel for review.
- Updated the match frequency for the Department of Human Resource Management from quarterly to monthly.
- Direct Benefits: The total amount of benefits would depend on the support order amount and the expenses amount.

Indirect Benefits:

- There are no monetizable indirect benefits associated with this change.

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Describe the direct costs of this proposed change here.</p> <ul style="list-style-type: none"> • Updated to remove the notarization requirement for the Affidavit of Nondisclosure. • Updated to clarify who may be present during an interview and provide procedures for the Incident Alert Indicator. • Updated to add what the effective date is of a modified ASO when the CP is deceased or cannot be located on an ARRP case. • Updated to clarify what should be used to verify paternity disposition for a child. • Updated to clarify that the Division does not collect or enforce orders that are for expenses that were incurred prior to the birth of a child. • Updated to add that the requesting party has 15 calendar days to provide proof of a change in circumstances for a special circumstance review. • Updated to include Section I Tribunal Communication and Cooperation. Updated form name to Order to Withhold Addendum Limited Services Case. • Updated to clarify that the same process is used for State Tax Refund, Lottery Winnings and Vendor Payment Intercept. • Updated to change unit name from Central Registry to the Financial Response Team. • Updated to add, delete, or clarify various documents and their purposes. <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <ul style="list-style-type: none"> • Updated to clarify what amount should be used for an arrears payment for other states' orders.
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	<ul style="list-style-type: none"> • Updated to clarify how to determine the monthly payment amount for the Payment Agreement. • Updated to add vendor payment to the State Income Tax/Lottery Winnings Intercept Notification and clarify that the SDU does not manually generate the Vendor Payment Intercept Notification. • Updated to refer Division staff to Reporting the NCP to Consumer Credit Reporting Agencies section of the Program Manual for more information. • Updated to add processes for when the Division has lost contact with a CP or the CP is deceased on an ARRP case and a review is being conducted. • Updated to clarify what actions may be appealed. • Updated to clarify that the NCP may contest the arrearages within 30 days from receipt of the Pre-Offset Notice by requesting an administrative appeal. • Tax/Lottery Winnings Intercept Notification; updated to add vendor payment to the State Income Tax/Lottery Winnings Intercept Notification. • Indirect Costs: May vary depending on administrative cost and legal costs. <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <ul style="list-style-type: none"> • Updated to include support orders that do not separate expenses that were incurred prior to the birth of a child from pregnancy and delivery expenses should be referred to Legal Counsel for review. • Updated the match frequency for the Department of Human Resource Management from quarterly to monthly. • Direct Benefits: The total amount of benefits would depend on the support order amount and the expenses amount. <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</p> <ul style="list-style-type: none"> • There are no monetizable indirect benefits associated with this change.
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Direct Benefits: •Updated to include support orders that do not separate expenses that were incurred prior to the birth of a child from pregnancy	(b) Indirect Benefits: •There are no monetizable indirect benefits associated with this change.

	<p>and delivery expenses should be referred to Legal Counsel for review.</p> <ul style="list-style-type: none"> •Updated the match frequency for the Department of Human Resource Management from quarterly to monthly. •Direct Benefits: The total amount of benefits would depend on the support order amount and the expenses amount. 	
(3) Net Monetized Benefit	We cannot quantify cost for the following items as the prior explanation shows this fall with technical amendments to our internal processes.	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources		

Table 1c: Costs and Benefits under Alternative Approach

(1) Direct & Indirect Costs & Benefits (Monetized)	An alternative approach is not feasible because we cannot quantify cost for the items as the prior explanation shows this fall with technical amendments to our internal processes.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) None	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

Impact on Local Partners-None

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: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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 Benefits: None We cannot quantify cost for the following items as the prior explanation shows this fall with technical amendments to our internal processes which do not impact our customers-families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)	None because this falls with technical amendments to our internal processes which do not impact our customers-families.	
(4) Information Sources		

Impacts on Small Businesses-None

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)	Direct Costs: Describe the direct costs of this proposed change here. Indirect Costs: Describe the indirect costs of the proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. Indirect Benefits: Describe the indirect benefits of the proposed change.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(4) Alternatives		
(5) Information Sources		

Changes to Number of Regulatory Requirements-None

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
	Statutory:				
	Discretionary:				
				Total Net Change of Statutory Requirements:	
				Total Net Change of Discretionary Requirements:	

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 Length	New Length	Net Change in Length
Child Support Enforcement Program Manual	197,629 words	197,753 words	124

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