

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	Update Temporary Assistance for Needy Families (TANF) Manual
Date this document prepared	06/12/2024
Regulatory Stage (including Issuance of Guidance Documents)	Update Guidance Document

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. Revised guidance includes:</p> <ul style="list-style-type: none"> · Updating the Department of Social Services address; · Updating information for filing complaints of alleged discrimination with the Office of Civil Rights (OCR) at the U.S. Department of Health and Human Services; · Clarifying when the verification of immunization is due after the client receives initial notification of the immunization requirement; · Clarifying when the penalty can be imposed for failure to comply with the immunization requirement; · Clarifying when a verification is needed for children that are home schooled; · Clarifying which documents may be used as acceptable evidence of the circumstances for a good cause claim of emotional or physical harm for not cooperating with paternity establishment or pursuing child support; · Additional information was added about the Reaching Independence through Savings and Education (RISE) program and to clarify the role of the intermediary and the local agency staff in the RISE program recruitment and application process; · Clarification that applications must not be denied if an applicant fails to return the signed and dated “Do You Have a Disability?” Form; · Language was added to remove the requirement to have certain TANF forms signed during the renewal process; · Language was added to allow new unit members to be reported through multiple means rather than just by submitting a new application; · Guidance was revised to include instructions for customers when reporting stolen benefits or suspected fraudulent activity on their debit card; · Information about new functionality in the Virginia Case Management System (VaCMS) has been added. VACMS has been modified to reconcile the date of death for household members when a death is reported through a systems match. <p>Indirect Costs: There are no indirect cost for either the state or the local agencies resulting from the guidance changes.</p> <p>Direct Benefits: No changes are being made that will impact benefit levels or eligibility for TANF assistance. The benefits of these changes are indirect.</p> <p>Indirect Benefits: The proposed changes will simplify eligibility processes and reduce the administrative burden for both eligibility staff and applicants and recipients of TANF assistance.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct costs are associated with maintaining the status quo. However, it is not beneficial to maintain the status quo by not implementing these streamlining and simplification changes. Maintaining the status quo would mean maintaining burdensome administrative processes that make the eligibility process more difficult for both staff and customers.</p> <p>Indirect Costs: No indirect costs are associated with maintaining the status quo. However, it is not beneficial to maintain the status quo by not implementing these streamlining and simplification changes. Maintaining the status quo would mean maintaining burdensome administrative processes that make the eligibility process more difficult for both staff and customers.</p> <p>Direct Benefits: None.</p> <p>Indirect Benefits: None</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)	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)	Changes could be made to reduce the documents used for verification of different eligibility factors. Such changes would increase the administrative burden for both staff and customers.	
(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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: There are no direct costs to local partners as 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: There are no indirect costs to local partners associated with the proposed guidance change.</p> <p>Direct Benefits: There are no direct benefits to local partners as the proposed guidance change will not change state or local benefits nor require any state expenditure beyond what was currently appropriated.</p> <p>Indirect Benefits: The proposed changes will simplify eligibility processes and reduce the administrative burden for both eligibility staff and applicants and recipients of TANF assistance</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) Assistance	N/A
(5) Information Sources	N/A

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: The implementation of the proposed guidance change does not have a direct impact on families.</p> <p>Indirect Costs: There is not an indirect impact on families.</p> <p>Direct Benefits: The implementation of the proposed guidance change does not have a direct benefit to families.</p> <p>Indirect Benefits: The proposed changes will simplify eligibility processes and reduce the administrative burden for both eligibility staff and recipients of TANF assistance.</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 &	The guidance changes do not directly or indirectly impact costs and benefits for small businesses.
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Benefits (Monetized)		
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non- Monetized)	The guidance changes do not directly or indirectly impact costs and benefits for 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.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
N/A	(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
N//A				

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
N/A		

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
TANF Guidance Manual	197,930	198,346	+416

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