

Office of Regulatory Management  
Economic Review Form

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| <b>Agency name</b>   | Department of Social Services  |
| <b>Virginia Administrative Code (VAC) Chapter citation(s)</b>      | N/A  |
| <b>VAC Chapter title(s)</b>  | N/A  |
| <b>Action title</b>  | Department of Social Services (VDSS) Child and Family Services Manual, Chapter A: Practice Foundations |
| <b>Date this document prepared</b>                                 | June 18, 2024  |
| <b>Regulatory Stage (including Issuance of Guidance Documents)</b> | Issuance of Updated 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)**

|  |   |                            |
|--|---|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Direct Costs: None. This guidance document is updated to align with the DSS Child &amp; Family Services Manual <i>Chapter B: Prevention Services</i> and <i>Chapter C: Child Protective Services</i>. There will be no direct costs.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: As the result of SB 39/ HB 27 (2024 General Assembly), the updates ensure the required facilitated decision-making meetings are conducted at the appropriate time and according to best practice. The document provides additional protection for parental rights, promotes placement with relatives and fictive kin, enhances reunification efforts, and ensures all necessary parties are brought together to develop concrete timeframes for permanency. Additionally, the proposed updates meet the legal mandate of state law, regulation, and best practices.</p> <p>Indirect Benefits: None</p> |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs   | Direct & Indirect Benefits |
|  | (a) Unknown   | (b) N/A                    |
| (3) Net Monetized Benefit                          | N/A   |                            |
| (4) Other Costs & Benefits (Non-Monetized)         | The guidance will conform to law, regulation, and best practice; and will thus, avoid confusion.  |                            |
| (5) Information Sources                            | <a href="#">Fiscal Impact Statement</a> prepared by DPB for HB27/SB39 (2024 Session of Virginia General Assembly)   |                            |

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

|  |   |  |
|--|---|--|
| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Not aligning the guidance document with other related documents would not be beneficial to local departments of social services or families.</p> <p>Direct Costs: N/A</p> <p>Indirect Costs: N/A</p> <p>Direct Benefits: NA</p> <p>Indirect Benefits: N/A.</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) | There are no alternatives to aligning the guidance document with other related documents, for consistency. |                            |
| (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) | Direct Costs: None. This guidance document is updated to align with <i>Chapter B: Prevention Services</i> and <i>Chapter C: Child Protective Services</i> . |
|--|---|

|  |  |                            |
|--|--|----------------------------|
| Benefits (Monetized)                       | Indirect Costs: None.<br><br>Direct Benefits: None<br><br>Indirect Benefits: None  |                            |
| (2) Present Monetized Values               | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) Unknown  | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized) | Local departments of social services will benefit by having instructions on how to meet the legal mandate of state law, regulation, and best practice. |                            |
| (4) Assistance                             |  |                            |
| (5) Information Sources                    | <a href="#">Fiscal Impact Statement</a> prepared by DPB for HB27/SB39 (2024 Session of Virginia General Assembly)                                      |                            |

**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: None. This guidance document is updated to align with both <i>Chapter B: Prevention Services</i> and <i>Chapter C: Child Protective Services</i> ,<br><br>Indirect Costs: None.<br><br>Direct Benefits: As a result of HB27/SB39, the proposed changes ensure that families have a voice in the decision-making process when children cannot remain with their parents. These changes promote placement with relatives and fictive kin, enhance reunification efforts, and provide concrete timeframes for permanency. Additionally, the proposed changes meet the legal mandate of state law, regulation, and best practices.<br><br>Indirect Benefits: Describe the indirect benefits of the proposed change. |
|--|---|

|  |  |                            |
|--|--|----------------------------|
| (2) Present Monetized Values               | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized) | The guidance document will align with two other guidance documents, resulting from HB27/SB39 (2024). The updates ensure that families have a voice in the decision-making process when children cannot remain with their parents. These changes promote placement with relatives and fictive kin, enhance reunification efforts, and provide concrete timeframes for permanency. Additionally, the proposed changes meet the legal mandate of state law, regulation, and best practices. |                            |
| (4) Information Sources                    | <a href="#">Fiscal Impact Statement</a> prepared by DPB for HB27/SB39 (2024 Session of Virginia General Assembly)  |                            |

**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) | Direct Costs: None.<br>Indirect Costs: None.<br>Direct Benefits: None<br>Indirect Benefits: None |                            |
| (2) Present Monetized Values                       | Direct & Indirect Costs  | Direct & Indirect Benefits |
|  | (a) N/A  | (b) N/A                    |
| (3) Other Costs & Benefits (Non-Monetized)         | None.  |                            |
| (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 |
|--|---------------------|---------------|-----------|--------------|----------------------------------|
|  | (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> |
|---|----------------------------|-----------------------|---------------------------------|
| DSS Child & Family Services Manual<br>Chapter A: Practice Foundations | 16, 857                    | 17, 301               | 444                             |
|   |                            |                       |                                 |

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