

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	Virginia Department of Social Services (VDSS) Child and Family Services Manual, Chapter C: Child Protective Services
Date this document prepared	June 6, 2024
Regulatory Stage (including Issuance of Guidance Documents)	N/A

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: There are no direct costs associated with the proposed changes to the guidance document. Changes are needed as a result of HB1550 (2023) and HB27/SB39 (2024). Any associated costs for the legislation were addressed by the General Assembly in the budget.</p> <p>Under prior law, the Office of the Attorney General (OAG) provided legal services to DSS for all circuit court appeals, as they were administrative reviews of the agency’s finding. HB 1550 eliminated the involvement of the OAG, as the appeal is not an administrative review, but instead a trial de novo, and requires local departments of social services (LDSS) to provide their own legal representation to handle the bench or jury trial.</p> <p>SB39 and HB27 established the Parental Child Safety Placement program to support placements of children with relatives to avoid foster care.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: None</p> <p>Indirect Benefits: None</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) Unknown</p>	<p>(b) N/A</p>
<p>(3) Net Monetized Benefit</p>		
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>Non-monetized benefits include ensuring parental rights, promoting placement of children with relatives and fictive kin, enhancing reunification efforts, and providing concrete timeframes for permanency. The proposed changes to guidance meet the legal mandate of state law, regulation and best practice and will thus, avoid confusion by local departments and families.</p>	
<p>(5) Information Sources</p>	<p>Legislative Information System, 2023 and 2024 sessions</p>	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>It would not be beneficial to maintain the status quo, as the guidance document would not align with law and best practice.</p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the indirect costs of the proposed change.</p> <p>Direct Benefits: Describe the direct benefits of this proposed change here.</p> <p>Indirect Benefits: Describe the indirect benefits of the proposed change.</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)	<p>The agency finds the use of guidance documents is the most effective approach to providing important information to local departments of social services, enabling them to more effectively administer social services program.</p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the direct costs of this proposed change here.</p> <p>Direct Benefits: Describe the direct costs of this proposed change here.</p> <p>Indirect Benefits: Describe the direct costs of this proposed change here.</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	

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 associated with the proposed changes to the guidance document to local partners. Changes are needed as a result of HB1550 (2023) and HB27/SB39 (2024). Any associated costs for the legislation were addressed by the General Assembly in the budget.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: None</p> <p>Indirect Benefits: None</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) Unknown	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>The non-monetized benefits to local departments include ensuring parental rights, promoting placement of children with relatives and fictive kin, enhancing reunification efforts, and providing concrete timeframes for permanency. The proposed changes to guidance meet the legal mandate of state law, regulation and best practice and will thus, avoid confusion by local departments and families.</p>	
(4) Assistance		

(5) Information Sources	Fiscal Impact Statement prepared for HB 1550 (2023 Session of Virginia General Assembly).
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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: There are no direct costs associated with the proposed changes to the guidance document to families. Changes are needed as a result of HB1550 (2023) and HB27/SB39 (2024). Any associated costs for the legislation were addressed by the General Assembly in the budget.</p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the direct costs of this proposed change here.</p> <p>Direct Benefits: Describe the direct costs of this proposed change here.</p> <p>Indirect Benefits: Describe the direct costs of this proposed change here.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>The non-monetized benefits to families include ensuring parental rights, promoting placement of children with relatives and fictive kin, enhancing reunification efforts, and providing concrete timeframes for permanency. The proposed changes to guidance meet the legal mandate of state law, regulation and best practice and will thus, avoid confusion by local departments and families.</p>	
(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 & Benefits (Monetized)	<p>Updating the guidance document has no impact on small businesses.</p> <p>Direct Costs: Describe the direct costs of this proposed change here.</p> <p>Indirect Costs: Describe the direct costs of this proposed change here.</p> <p>Direct Benefits: Describe the direct costs of this proposed change here.</p> <p>Indirect Benefits: Describe the direct costs of this proposed change here.</p>	
(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	Initial Count	Additions	Subtractions	Net Change

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
22VAC40-705-200	Create new section on the Parental Child Safety Placement Program, as the result of SB 39/ HB 27 passed during the 2024 session of the Virginia General Assembly.			

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
Chapter C: Child Protective Services	178,803 words	112,461 words	-66,342 words