

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22 VAC 30-20
VAC Chapter title(s)	Guidance Document (ID: 6494): Work Incentives Specialist Advocate (WISA) Manual
Action title	Update WISA Manual
Date this document prepared	DATE
Regulatory Stage (including Issuance of Guidance Documents)	Guidance Document Update

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.

Background on the WISA Program: The federal Ticket to Work and Work Incentives Improvement Act of 1999 allows the Social Security Administration (SSA) to authorize and fund the Work Incentives Planning and Assistance (WIPA) program. Because there are a limited number of WIPA projects around the state and the demand for work incentives and benefits counseling often exceeds the staffing resources that the WIPA project has, the Department for Aging and Rehabilitative Services (DARS) has integrated the Work Incentives Specialist Advocate (WISA) program into our vocational rehabilitation services model.

Trained WISA staff are authorized by DARS, the Department for the Blind and Vision Impaired (DBVI), and the Department of Behavioral Health and Developmental Services (DBHDS) to provide clear explanations about Social Security Disability Insurance (SSDI) and/or Supplemental Security Income (SSI) benefits to individuals who receive them and to client advocates, referring DARS Counselors, DBVI Counselors, and Case Managers. WISA certified staff help explain the effects earned income will have on the client's benefits, and health insurance, such as Medicaid and Medicare, the availability of work incentives to help the individual transition from benefits to self-sufficiency, and how clients can protect their health insurance benefits while they work. Once these issues have been addressed, individuals can make informed decisions about going to work. Virginia WISAs use [WorkWORLD for the Web](#) (WW), an online, Virginia specific program that provides accurate information on how a SSDI/SSI client's financial circumstances will change once they go to work.

Background on the WISA Manual Changes: This WISA Manual provides information about and requirements for the WISA contracted programs and billable services, vocational rehabilitation (VR) counselor procedures, and samples of forms for WISAs and VR counselors.

When a client receives SSI and/or SSDI and returns to work, SSA requires them to complete a Work Activity Report. This report is used to document how much a client is earning, how many hours they are working, and whether work incentives apply. Many WISA providers have identified a service gap; they have clients asking them for assistance with completing these reports, but it is not currently a billable WISA service. WISA providers are investing time and resources into helping clients complete these reports, however, they cannot currently bill for their time. These changes would add this to the list of reimbursable services.

The changes to the WISA Manual include:

- **Title Page:** Updated to current date.
- **Page 4:** Added "Work Activity Report" to WISA billable services list.
- **Page 19:** Added the service description, procedure code, and fee for the newly added "Work Activity Report" to the WISA billable services list.

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>No new funding is needed to implement this change. Costs to implement this change can be absorbed with current funding.</p> <p>DARS estimates that forty (40) clients annually will receive the new service, which provides them guidance and support in completing the SSA-required Work Activity Report.</p> <p>Direct Costs: \$10,000 annually across all WISA providers (\$250 per client x 40 clients per year = \$10,000).</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$10,000</p>	<p>(b) \$0</p>
<p>(3) Net Monetized Benefit</p>	<p>-\$10,000. However, no new funding is needed to implement this change. Costs to implement this change can be absorbed with current funding.</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>Non-Monetized Benefits: This service will allow an estimated 40 clients annually to receive the support they need to complete the SSA-required Work Activity Report. The inclusion of this service in the WISA Manual clarifies to providers and clients that DARS considers it a standard service under this program. It ensures clients that need this service can receive it, and WISA providers who assist clients in this capacity can be reimbursed for it.</p> <p>Ensuring that the WISA Manual filed on the Town Hall website is updated and consistent with current DARS/WISA practices provides the WISA and VR staff, public, and stakeholders with a clear and publicly accessible location for the WISA Manual policies and procedures. This advances ORM’s goals of streamlined access and transparency.</p>	
<p>(5) Information Sources</p>	<p>N/A</p>	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>WISAs have been, and would continue to, informally provide this service, however, they are not able to be reimbursed for it.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$10,000 annually not expended by DARS (\$250 per client x 40 clients per year = \$10,000). WISAs have been, and would continue to, informally provide this service, however, they are not able to be reimbursed for it.</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$5,000
(3) Net Monetized Benefit	\$10,000 for DARS annually	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>There are no alternative approaches.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

	(a) \$0	(b) \$0
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(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)	There are no local partners impacted. Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>The WISA Program helps individuals and their families who are receiving SSDI or SSI benefits better understand the effects earned income will have on their benefits and supports their transition to self-sufficiency. Through the WISA Program, individuals can make informed decisions about going to work and how the number of hours they work will affect their benefits.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p> <p>(a) \$0</p>	<p>Direct & Indirect Benefits</p> <p>(b) \$0</p>
<p>(3) Other Costs & Benefits (Non-Monetized)</p>	<p>Non-Monetized Benefits: WISA providers report that clients sometimes struggle to complete the SSA-required Work Activity Report, which can put their benefits at risk. Adding this small service would create a formal mechanism to help those clients maintain compliance with SSA requirements.</p> <p>Ensuring that the WISA Manual filed on the Town Hall website is updated and consistent with current DARS/WISA practices provides the WISA and VR staff, public, and stakeholders with a clear and publicly accessible location for the WISA Manual policies and procedures. This advances ORM’s goals of streamlined access and transparency.</p>	
<p>(4) Information Sources</p>	<p>N/A</p>	

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>DARS maintains a network for 120 certified WISAs statewide. There are an additional 30 more in process of being certified to provide WISA services. Some, but not all, of the 120 WISA certified vendors are small businesses that work across 40 different partner organizations. These partners work in for profit LLC’s, Centers for Independent Living (CILs), Social Security Ticket to Work (TTW) Employment Networks (ENs), and Community Services Boards (CSBs).</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$10,000 annually across all WISA providers (\$250 per client x 40 clients per year = \$10,000). WISAs have been providing this service, however, they are not able to be reimbursed for it. Adding this service category supports and recognizes the time commitment that they make to their clients and provides compensation accordingly.</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs (a)	Direct & Indirect Benefits (b) \$10,000 annually across all WISA providers
(3) Other Costs & Benefits (Non-Monetized)	Non-Monetized Benefit: Adding this service category supports and recognizes the time commitment that they make to their clients and provides compensation accordingly.	
(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):				
Grand Total of Changes in Requirements:					(M/A):
					(D/A):
					(M/R):
					(D/R):

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
WISA Manual	51 pages	51 pages	0

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