

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	Temporary Assistance for Needy Families (TANF) Guidance
Date this document prepared	November 21, 2023
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)

(1) Direct & Indirect Costs & Benefits (Monetized)	<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. The proposed guidance change will increase the federal poverty limits to the current levels. The income threshold disregard for the Virginia Initiative for Education and Work (VIEW) program is based upon the federal poverty limit. Section 63.2-614 of the Code of Virginia allows the Commissioner of the Department of Social Services to set the VIEW income threshold at a percentage of the federal poverty level. The level set by the Commissioner is 100% of the federal poverty level for TANF and 150% of the federal poverty level for TANF-Unemployed Parents (TANF-UP). The federal poverty levels increase each year and the TANF guidance is updated accordingly.</p> <p>Indirect Costs: None.</p> <p>Direct Benefits: The proposed change will allow for the TANF program in the Commonwealth of Virginia to align the income eligibility evaluation of VIEW participants with the current established federal poverty level guidelines at 100% and 150%. Increasing the income thresholds for the VIEW program will not require any future state regulatory changes.</p> <p>Indirect Benefits: Conforming guidance by increasing the VIEW income threshold disregards to the current federal poverty levels allows for VIEW participants to earn higher wages while maintaining TANF eligibility. This helps the families receiving TANF to meet their basic needs and increases their spending abilities while working to triumph over poverty and achieving a living wage.</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 1b: Costs and Benefits under the Status Quo (No change to the regulation)

(1) Direct & Indirect Costs & Benefits (Monetized)	It is not beneficial to maintain the status quo by not implementing the income threshold changes in guidance. There would be direct and indirect costs to the Virginia citizens if VIEW participants are not given the opportunity to earn more wages while maintaining TANF eligibility
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	as these families would not be able to afford basic needs and work towards achieving a living wage. This would lead to more children in the Commonwealth experiencing homelessness, food insecurity, living without basic utilities, and not having adequate clothing and other necessary items.	
(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)	N/A	
(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: The proposed change will allow local partners to complete the income eligibility evaluation of VIEW participants with the current established federal poverty level guidelines at 100% and 150%. Increasing the income thresholds for the VIEW program will not require any future state regulatory changes.</p> <p>Indirect Benefits: Guidance for TANF and VIEW conform to match the current federal poverty guidelines.</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 proposed guidance change allows VIEW participants to earn higher wages while maintaining TANF eligibility. This helps the families receiving TANF met their basic needs and increases their spending abilities while working to triumph over poverty and achieving a living wage.</p> <p>Indirect Benefits: VIEW participants are eligible for supportive services (child care, transportation, medical/dental, work-related expenses, and</p>
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	emergency intervention) for the purpose of helping them obtain and maintain employment.	
(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 & Benefits (Monetized)	The guidance change to the income thresholds does not directly or indirectly impact costs and benefits for small businesses.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	Small businesses that employ VIEW participants may benefit from increased employee retention as VIEW participants are eligible for supportive services (child care, transportation, medical/dental, work-related expenses, and emergency intervention) for the purpose of helping them obtain and maintain employment.	
(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	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
Temporary Assistance for Needy Families Manual**	531 pages	537 pages	+6 pages
Temporary Assistance for Needy Families (7/22/2021)***	74 pages	0 pages	-74 pages

Temporary Assistance for Needy Families Manual Update (11/11/2021)***	50 pages	0 pages	-50 pages
Temporary Assistance for Needy Families Updates (7/21/2022)***	32 pages	0 pages	-32 pages
Temporary Assistance for Needy Families Manual Updates (10/27/2022)***	56 pages	0 pages	-56 pages
TANF Policy Manual (8/6/2020)***	86 pages	0 pages	-86 pages
Total Change in VDSS Guidance Document Length	829 pages	537 pages	-292 pages

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

** This is the complete TANF Manual currently in effect, that is posted to the DSS website and not on the Regulatory Town Hall. The new 537-page document will, upon completion of the public comment forum, replace the 531-page document and be accessible on the Town Hall.

***These guidance documents are being eliminated.