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Fast Track Proposed Regulation
Agency Background Document

Agency name	State Board of Social Services
Virginia Administrative Code (VAC) citation	22VAC40-100
Regulation title	Minimum Standards for Licensed Child Caring Institutions
Action title	Update Licensed Child Caring Institutions Regulation
Date this document prepared	February 21, 2013

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Orders 14 (2010) and 58 (1999), and the *Virginia Register Form, Style, and Procedure Manual.*

Brief summary

Please provide a brief summary (no more than 2 short paragraphs) of the proposed new regulation, proposed amendments to the existing regulation, or the regulation proposed to be repealed. Alert the reader to all substantive matters or changes.

This regulatory action adds language to clarify that Code sections referenced in the regulation are found in the Code of Virginia as it existed on January 1, 1987.

Statement of final agency action

Please provide a statement of the final action taken by the agency including (1) the date the action was taken, (2) the name of the agency taking the action, and (3) the title of the regulation.

The State Board of Social Services approved the Fast Track action on 22VAC40-100, Minimum Standards for Licensed Child Caring Institutions, on February 21, 2013.

Legal basis

Please identify the state and/or federal legal authority to promulgate this proposed regulation, including (1) the most relevant citations to the Code of Virginia or General Assembly chapter number(s), if applicable, and (2) promulgating entity, i.e., agency, board, or person. Your citation should include a specific provision authorizing the promulgating entity to regulate this specific subject or program, as well as a reference to the agency/board/person's overall regulatory authority.

Section 63.2-217 of the Code provides the Board the general authority for the development of regulations to carry out the purposes of Title 63.2. Sections 63.2-1701, 63.2-1817, 63.2-1734, 16.1-278.2, 16.1-278.4, and 16.1-278.8 of the Code mandate licensure of child welfare agencies, except those that meet the exemptions contained in §§ 63.2-1715-1718. Child caring institutions are defined as children's residential facilities and children's residential facilities that fall under the definition of child welfare agencies. Those child caring institutions established prior to January 1, 1987 that receive no public funds are licensed under the Minimum Standards for Licensed Child Caring Institutions. Child caring institutions established on or after January 1, 1987 are licensed under the regulation established for children's residential facilities.

Purpose

Please explain the need for the new or amended regulation. Describe the rationale or justification of the proposed regulatory action. Detail the specific reasons the regulation is essential to protect the health, safety or welfare of citizens. Discuss the goals of the proposal and the problems the proposal is intended to solve.

The amendments are necessary to clarify that Code sections referenced in the regulation are found in the Code of Virginia as it existed on January 1, 1987.

Rationale for using fast track process

Please explain the rationale for using the fast track process in promulgating this regulation. Why do you expect this rulemaking to be noncontroversial?

Please note: If an objection to the use of the fast-track process is received within the 30-day public comment period from 10 or more persons, any member of the applicable standing committee of either house of the General Assembly or of the Joint Commission on Administrative Rules, the agency shall (i) file notice of the objections with the Registrar of Regulations for publication in the Virginia Register, and (ii) proceed with the normal promulgation process with the initial publication of the fast-track regulation serving as the Notice of Intended Regulatory Action.

Executive Order 14 allows state agencies to use a fast-track rule making process to expedite regulatory changes that are expected to be non-controversial. As part of the periodic review process, the Office of the Attorney General advised the use of the fast track process to make minor amendments to Code references, as these actions are not expected to be controversial.

Substance

Please briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both where appropriate. (Provide more detail about these changes in the "Detail of changes" section.) Please be sure to define any acronyms.

The regulation is amended to clarify that Code sections referenced in the regulation are found in the Code of Virginia as it existed on January 1, 1987.

Issues

Please identify the issues associated with the proposed regulatory action, including:
1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions;
2) the primary advantages and disadvantages to the agency or the Commonwealth; and
3) other pertinent matters of interest to the regulated community, government officials, and the public.
If there are no disadvantages to the public or the Commonwealth, please indicate.

The primary advantage of this regulatory action to the agency and to the public is that it clarifies Code citations for easier reference. There are no disadvantages to the public or the Commonwealth.

Requirements more restrictive than federal

Please identify and describe any requirement of the proposal which is more restrictive than applicable federal requirements. Include a rationale for the need for the more restrictive requirements. If there are no applicable federal requirements or no requirements that exceed applicable federal requirements, include a statement to that effect.

The proposed changes do not contain any requirements that are more restrictive than federal requirements.

Localities particularly affected

Please identify any locality particularly affected by the proposed regulation. Locality particularly affected means any locality which bears any identified disproportionate material impact which would not be experienced by other localities.

No locality is particularly affected by the proposed changes.

Regulatory flexibility analysis

Please describe the agency's analysis of alternative regulatory methods, consistent with health, safety, environmental, and economic welfare, that will accomplish the objectives of applicable law while minimizing the adverse impact on small business. Alternative regulatory methods include, at a minimum:

1) the establishment of less stringent compliance or reporting requirements; 2) the establishment of less stringent schedules or deadlines for compliance or reporting requirements; 3) the consolidation or simplification of compliance or reporting requirements; 4) the establishment of performance standards for small businesses to replace design or operational standards required in the proposed regulation; and 5) the exemption of small businesses from all or any part of the requirements contained in the proposed regulation.

Leaving the regulation as it is currently written is unclear, as all of the references to Code sections are outdated. The proposed amendment clarifies that Code sections referenced in the regulation are found in the Code of Virginia as it existed on January 1, 1987. The proposed amendment is not expected to have any impact on small business.

Economic impact

Please identify the anticipated economic impact of the proposed new regulations or amendments to the existing regulation. When describing a particular economic impact, please specify which new requirement or change in requirement creates the anticipated economic impact.

Projected cost to the state to implement and enforce the proposed regulation, including (a) fund source / fund detail, and (b) a delineation of one-time versus on-going expenditures	Implementation and enforcement of the amendments to the regulation will not result in any increased cost to the state. Licensing staff with responsibility for implementation and enforcement are currently in place.
Projected cost of the *new regulations or changes to existing regulations* on localities.	None
Description of the individuals, businesses or other entities likely to be affected by the *new regulations or changes to existing regulations*.	The amendments to the regulation will affect licensed child caring institutions.
Agency's best estimate of the number of such entities that will be affected. Please include an estimate of the number of small businesses affected. Small business means a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than $6 million.	There are currently seven licensed child caring institutions, all of which are small businesses.
All projected costs of the *new regulations or changes to existing regulations* for affected individuals, businesses, or other entities. Please be specific and include all costs. Be sure to include the projected reporting, recordkeeping, and other administrative costs required for compliance by small businesses. Specify any costs related to the development of real estate for commercial or residential purposes that are a consequence of the proposed regulatory changes or new regulations.	Implementation and enforcement of the new regulation will not result in any increased cost to the affected individuals, businesses, or other entities.
Beneficial impact the regulation is designed to produce.	Increased ability to protect the health, safety and welfare of the children by having a regulation with

	updated Code references.

Alternatives

Please describe any viable alternatives to the proposal considered and the rationale used by the agency to select the least burdensome or intrusive alternative that meets the essential purpose of the action. Also, include discussion of less intrusive or less costly alternatives for small businesses, as defined in §2.2-4007.1 of the Code of Virginia, of achieving the purpose of the regulation.

The agency did not identify any viable alternative to the proposal considered. The proposal adds clarification to Code of Virginia references. There is no less intrusive or less costly alternative that achieves the purpose of the regulatory action.

Periodic review/small business impact review result

If this fast-track regulation is the result of a periodic review/small business impact review, please (1) summarize all comments received during the public comment period following the publication of the Notice of Periodic Review, and (2) indicate whether the regulation meets the criteria set out in Executive Order 14 (2010), e.g., is necessary for the protection of public health, safety, and welfare, and is clearly written and easily understandable. In addition, please include, pursuant to § 2.2-4007.1 E and F, a discussion of the agency's consideration of: (1) the continued need for the regulation; (2) the nature of complaints or comments received concerning the regulation from the public; (3) the complexity of the regulation; (4) the extent to the which the regulation overlaps, duplicates, or conflicts with federal or state law or regulation; and (5) the length of time since the regulation has been evaluated or the degree to which technology, economic conditions, or other factors have changed in the area affected by the regulation.

Commenter	Comment	Agency response
Ruby Caskey, Patrick Henry Boys and Girls Home	"Hope for Tomorrow" is the slogan adopted by Patrick Henry in 1984. This slogan was coined with a twofold meaning: the first being that our "Hope for Tomorrow" is found in Jesus Christ and second that we provide training and opportunity for resident's to develop their talents and prepare them for a productive and meaningful life. This mission has been in place since Patrick Henry's early years and has been accomplished with great success with the governing of our licensure by the Minimum Standards for Child Residential Institutions. This being said I do not see how abolishing these standards and mandating operations under the Child Residential Facility licensure standards would benefit the services we provide to children and families in need. In effect it could negatively impact not only the services we provide, how we deliver these services, but also the outcome of these services. After reviewing the CRF standards there is no standard identified regarding the basic care, safety and welfare of the resident's that Patrick Henry Boy's & Girl's Homes is not currently practicing with Minimum Standards for Child Residential Institutions currently governing our licensing; therefore why	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.

	implement a change to a program that has proven successful in its mission for over 50 years.	
David J. Marshall	Retain Minimum Standards I am writing in support of maintaining Minimum Standards for those institutions which have successfully operated under them for decades. While a long, successful history alone may not be enough to warrant continuation of Minimum Standards for those organizations which have operated under them, it certainly begs the question of why it should be changed. For those charitable organizations which receive no government funding or support, and have an admirable record of compliance there is no need to add on extra oversight and paperwork and mindless record-keeping for the sake of bureaucratic fiat. Children in the care of these organizations should have no different status, in the eyes of the Commonwealth of Virginia, than any other child residing in Virginia. They were not placed by any state agency but by the trusting hands, and by the faithful judgement, of their parents or legal guardians. These organizations operate in the light of day, completely open to the view of their parents, the Department of Social Services and, for that matter, the citizens of the Commonwealth. Operations, personnel, financial management and policies and procedures are under the watchful eye of a Board of Trustees with a long history of ensuring the highest quality of care for children who come into the programs. In my opinion, as a 15 year member and past President of the Board of one of these organizations, the quality of care provided is unmatched by any childcare organization in Virginia. From what I understand from those in a position to know the fact, the care provided is also far superior to that provided by many in the foster care system in our fine commonwealth.	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.
Robert J. Day, Executive Director, Patrick Henry Boys and Girls Homes	In Support of Minimum Standards I want to express my support for retaining the Minimum Standards for Licensed Child Caring Institutions for three reasons. 1. The institutions under these standards do not receive government funding. They are truly “charitable organizations” maintained by a free association of clients and organization. Because the state does not financially support or reimburse these institutions the state has only a minimum vested interest in them. 2. Since Minimum Standard Institutions are not providing services on behalf of the state the only regulations that should concern the state are those regarding the health and safety of the residents. Decades of successful operations of these facilities are evidence that Minimum Standards do more than an adequate job of this. 3. The residents in these private facilities are not wards of the state but have been voluntarily placed by their parents or guardians. Things like program parameters, treatment goals, and case management are matters of concern between the parents and the institution, not the state.	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.

Crystal Boyd-Morton, BS,QMHP Social Worker Patrick Henry Boys and Girls Home	Patrick Henry Boy's & Girl's Homes was founded in 1951 which established a namesake with a living memorial to Patrick Henry, Statesman who loved children. The ministry goals were driven by the great virtues possessed by Patrick Henry to include: Christianity, patriotism, work, citizenship, academics, and discipline. While all of these are important Christianity is the one that stands out as the common link in all that Patrick Henry as an organization has accomplished over the past 50 years. This Christian foundation not only defines who we are as an organization it provides a foundation for the services we offer and the evolvement of new services that are established as a direct need. Terminating the Minimum standards that regulate Child Residential Institutions would limit our ability to continue to build based on Christian Principles and values, thus minimizing the initial purpose in the founding of Patrick Henry Boy's & Girl's Homes. Again I request that you do not eliminate the Minimum Standards that currently govern Child Residential Institutions thus continuing to allow continued growth to benefit the current and future residents of Patrick Henry Boy's & Girl's Homes.	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.
Patty E. Hammock Child & Family Services Coordinator Patrick Henry Boys & Girls Homes and Patrick Henry Boys & Girls Homes	The decision to eradicate the Minimum standards for Child Residential Care Institutions would impede the autonomy afforded our facility in the development of plans of care for individual residents based on their specific needs. Due to the fact that we do not receive government funding and are not licensed under the Child Residential Care Facility standards we have autonomy that other facilities that are licensed under CRF standards do not have. This provides us the ability to specialize our services and meet the need of resident's referred out of state regulated facilities, thus becoming a resource for other facilities and children. Should CRI Minimum standards be eliminated this would break a bond for us as a resource for other facilities who are unable to meet the needs of children and families related to limitations placed on their program by mandated CRF standards.	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.
Sherri L. Meeks, Rn, BSN Patrick Henry Boys & Girls Home	As the Licensing Compliance Coordinator/Health Care Coordinator for Patrick Henry Boy's & Girl's Homes I do not feel that it would be beneficial to abolish the Minimum Standards for which Child Residential Facility are governed. In reality to abolish these standards would be unfavorable in the fact that it would in no way improve the quality of services provided by our facility but would increase cost to implement and maintain the standards as set forth for Child Residential Facilities. The change of standards would increase cost per resident and require an increased budget (which would be a strain in today's economy). The fact that we remain after 5o years of service a private, self funded organization easily enables one to see that a change in standards requiring additional funds for the organization would be more harmful than advantageous in regards to the services we provide. In our tenure no child has been denied admission to our program due to the parent or guardian's inability to pay and it is our goal to maintain this standard.	Section 63.2-1737.C of the Code of Virginia, requires the agency to retain this regulation.
Stacy C. Garrett, Executive	It is my understanding that the Department of Social Services is reviewing the regulation 22 VAC 40-100, Minimum Standards for Licensed Child Caring Institutions, to determine	Section 63.2-1737.C of the Code of Virginia requires the agency to

Director, Miller Home of Lynchburg	if said regulation should be terminated, amended or retained in its current form. Let me state up front that I strongly believe that the regulation should be retained in its current form. Terminating the regulation would be extremely detrimental to the three homes currently licensed under the Minimum Standards – Miller Home of Lynchburg, Union Mission Children's Home "Hope Haven", and Patrick Henry Boys and Girls Home; three institutions with proud and lengthy histories of service to children in Virginia for a combined period of more than 224 years. The inspections and certifications for each of these homes have shown the quality of care and dedication to the profession of caring for children throughout the years. Presumably, termination of 22 VAC 40-100 would necessitate the agencies currently licensed under that regulation being licensed under 22 40-10, Standards for Interdepartmental Regulation of Children's Residential Facilities, or CORE regulations as they are often called. Forcing these agencies to make this switch would interfere tremendously with their ability to carry out their mission. The concept of one-size-fits-all in the regulating of Residential Child Care Facilities is ill advised. It is important to understand that there are some genetic differences in child care programs that require separate attention. Our homes were incorporated as private, non-profit, charitable programs. The dream of extending a helping hand to children with needs that could not be met in their natural homes was shared by many people who were willing to give of themselves and make financial commitments. These commitments have led to the development of programs, building facilities, providing equipment, and supporting operating budgets **entirely** with private funding. The charity and dedication of this work is reflected in the services being provided free to those who cannot afford to pay. May I remind you that all of this has been accomplished **without** government funding. Miller Home of Lynchburg has not received State or Federal funding since 1875. No one would argue that minimum requirements to ensure the basic safety, health and general welfare of the children in care are essential, but these requirements already exist in the Minimum Standards. Requiring the three agencies currently licensed under Minimum Standards to be licensed under CORE standards would go far beyond the concept of the basic safety and wellbeing to the point of becoming intrusive to the uniqueness of these individual programs. Miller Home strives on being "family like", which is appreciated by our placing families, donors and supporters. If the agencies mentioned above had not existed, the state would have had the full responsibility for literally hundreds of children over the cumulative 224 years of service that these agencies have provided. Miller Home provides half a million dollars worth of services in the forms of residential group home and case management services *each year*. I feel safe in saying that it is an irrefutable fact that the private sector has done a great job in caring for Virginia's children. Unfortunately, altering or terminating the Minimum Standards would effectively bring all private institutions under the dominant	retain this regulation.

	control of the public sector and the individuality of all programs would diminish. Residential group homes are sometimes the best environment for some children to grow up in. What no one seems willing to acknowledge is that group homes can provide forever families. I could bring numerous examples, as could my colleagues, of individuals who have a forever family connection with the group home they grew up in. There are many examples of children who grew up in group homes who, as adults, now work in those very same group homes, or others much like them. There are numerous examples of children from group homes who stay in far closer contact with the houseparents they had, or with other staff members involved in their care, than with any biological family members. There is also the failure to acknowledge that group homes can often work with the child's biological family and facilitate a reunification of the family when that is in the best interest of the child. Could there be any stronger definition of a forever family than that? The department is specifically seeking comment regarding the essential need of the regulation. The need for the existing regulation has already been addressed: it is needed to ensure that the safety and welfare of each child is protected; that basic need like food, water, shelter, clothing and medical care are provided for, and that there is oversight provided for those individuals who are providing the care for the children in licensed programs. Beyond that however, there is no need for additional regulation. There is certainly no need for an additional 100 pages of regulation that would come along with the switch from Minimum Standards to CORE Standards. We in the Minimum Standards-licensed agencies have been providing quality care for children for years. Our inspections show how well, we are actually doing. Please take a moment and review those documents. Our intent is honorable and our performance speaks for itself. We have been licensed since our respective programs began operating and we have not objected to the concept of Minimum Standards. We are strongly opposed to the possibility of the elimination of the Minimum Standards, however, because they are at times in direct conflict with our basic philosophies, and are, in part, based upon requirements related to public funding, which we do not accept and have no intention of accepting. I still feel that the Minimum Standards are essential to ensure the safety, health and general welfare of each child. Requiring that we transition to CORE Standards; however, would go far beyond this concept. Not only are the CORE Standards at times in conflict with the philosophies of our organizations, but they also dictate the detail the administrative procedures and operating policies which we would be required to follow. Implementation would be extremely costly and would not improve the basic care being provided for the children. In effect, the CORE Standards would take over the management of our programs. This would be unwarranted intrusion into the affairs of strictly private institutions. Accordingly, ***any action other than retaining the Minimum Standards in their current form would be more burdensome and intrusive***. I have no doubt that the uniformity achieved by the	

	elimination of the Minimum Standards would be convenient for those charged with the responsibility of licensing and public accountability, but this concept is genuinely inappropriate for our programs. In fact, there even appears to be ample grounds to contest the legal authority of the state to require a privately operated, privately funded facility that provides services to privately placed children to conform to the same requirements placed on a publicly funded and publicly operated facility for the right to acquire a license. There are even more grounds to question the legal authority of the state to require a privately operated and privately funded facility to meet standards that have incorporated into them the quality assurance systems that are required to accept specific types of government funding that we do not accept and do not intend to accept. There are not specific or measurable goals that CORE regulations would achieve that we cannot achieve under the Minimum Standards in terms of caring for the children in our programs. The Minimum Standards, as they exist, are clearly written, easily understandable, and sufficient for the protection of the children in our programs. I simply request that Miller Home of Lynchburg, Patrick Henry Boys and Girls Home, and Union Mission "Hope Haven" be permitted to continue to be licensed under the Minimum Standards. I believe that this is a reasonable and appropriate request. I recognize that I am only talking about three agencies out of perhaps hundreds that the state must license, but it is a key element of the history of our country (and indeed our state) that the rights of even one institution or one individual must be preserved if our form of government is to survive. On behalf of Miller Home of Lynchburg, Patrick Henry Boys and Girls Home, and Union Mission "Hope Haven", I ask that you act favorably upon my request to retain Minimum Standards in their current form.	
J. Michael Davidson, Patrick Henry Boys & Girls Home	I am writing to show my overwhelming support for Minimum Standards as applied to private non-profit residential child care institutions that receive no governmental funding. I am the current Chairman of the Patrick Henry Boys and Girls Home Board of Trustees. Our institution has been providing a caring environment for children who do not have a nurturing family or are experiencing difficulties in life for over 50 years. Our residents are freely placed in our facilities by their parents or legal guardians rather than being placed by state agencies. At Patrick Henry we seek to provide the highest quality care for our residents and in most cases we exceed the minimum standards set for child care. One of the core building blocks of our institution is we were founded on the principal of providing a christian environment for the children in our care for we know without a change in spirit they may not be able to overcome the situations they find themselves in and may have no hope for tomorrow. The only way we can continue that mission is to stay under Minimum Standards. Patrick Henry Boys & Girls Home made a decision when it was founded not to accept governmental funding. Because of that we sought and a bill was passed in the legislature in 1987 that exempted private non-profit children's residential	Section 63.2-1737.C of the Code of Virginia requires the agency to retain this regulation.

	institutions that receive no governmental funding, such as Patrick Henry, from state licensure except from the minimum standards such as fire and building codes. I want to express my appreciation for the job you do and the relationship we have shared over the years. I would also encourage you to continue to support Minimum Standards for those non-profit residential child care facilities that do not accept governmental financial support.	
faizan Saeed	Effective Site Content The thoughts are very properly laid out. A job effectively done i must say. Along with the layout of the internet site contemplates nicely with content. I must say, as a lot as I enjoyed reading what you had to say, I couldn't help but lose interest after a while. It's as if you had a wonderful grasp on the subject matter, but you forgot to include your readers. Perhaps you should think about this from far more than one angle. Or maybe you shouldn't generalize so considerably. It's better if you think about what others may have to say instead of just going for a gut reaction to the subject. Think about adjusting your own believed process and giving others who may read this the benefit of the doubt.	This comment is unrelated to the periodic review.

The purpose of this regulation is to establish minimum standards of care to protect children who are placed in child caring institutions by their parents or legal guardians. The standards govern the sponsorship, organization and administration, personnel, buildings and grounds, programs, services, and record-keeping requirements in these facilities.

The regulation is essential to protect the health, safety, and welfare of children receiving care from child caring institutions receiving no public funds established prior to January 1, 1987. Section 63.2-1737.C of the Code requires licensure of child caring institutions.

The regulation is written in language understood by the licensed child caring institutions and regulators. However, because the current regulation was effective in 1987, some of the standards are outdated and inaccurate, e.g., Code sections referenced in the current regulation are outdated. This regulatory action will clarify that Code sections referenced in the regulation are found in the Code of Virginia as it existed in January 1, 1987.

There is a continued need for this regulation, as it is mandated by the Code. All comments received during the public comment period support retaining this regulation. The regulation does not conflict with federal or state law or regulation. The regulation has been in effect since 1987, and substantial revisions cannot be made without legislative action. The regulation has a positive impact on small businesses, in that all child caring Institutions are non-profit small businesses and the regulation does not create unnecessary burdens other than what is necessary for the protection of children.

Family impact

Please assess the impact of the proposed regulatory action on the institution of the family and family stability including to what extent the regulatory action will: 1) strengthen or erode the authority and rights of parents in the education, nurturing, and supervision of their children; 2) encourage or discourage economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents; 3) strengthen or erode the marital commitment; and 4) increase or decrease disposable family income.

The regulatory action will have no impact on the authority and rights of parents, economic self-sufficiency, self-pride, and the assumption of responsibility for oneself, one's spouse, and one's children and/or elderly parents, marital commitment, or disposable family income.

Detail of changes

Please list all changes that are being proposed and the consequences of the proposed changes. If the proposed regulation is a new chapter, describe the intent of the language and the expected impact. Please describe the difference between existing regulation(s) and/or agency practice(s) and what is being proposed in this regulatory action.

*If the proposed regulation is intended to replace an emergency regulation, please list separately (1) all differences between the **pre**-emergency regulation and this proposed regulation, and (2) only changes made since the publication of the emergency regulation.*

For changes to existing regulation(s), use this chart:

Current section number	Proposed new section number, if applicable	Current requirement	Proposed change, intent, rationale, and likely impact of proposed requirements
10-A		Definitions	Adds 'as it existed on January 1, 1987' to the Code of Virginia citation to clarify where this Code of Virginia reference can be found.
10-C		Definitions	Adds 'as it existed on January 1, 1987' to the Code of Virginia citation to clarify where this Code of Virginia reference can be found.
340		Describes requirements for confidentiality	Adds 'as it existed on January 1, 1987' to the Code of Virginia citation to clarify where this Code of Virginia reference can be found.