

Office of Regulatory Management
Economic Review Form

Agency name	Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22VAC30-30 (and 45 CFR 1329, specifically 45 CFR § 1329.17)
VAC Chapter title(s)	State Plan for Independent Living (SPIL) (ID: 4540)
Action title	One-Year Extension of Current SPIL as Required by the U.S. Administration for Community Living (ACL)
Date this document prepared	July 13, 2023
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.

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

<p>(1) Direct & Indirect Costs & Benefits (Monetized)</p>	<p>As required by 45 CFR 1329.17, State Plans for Independent Living (SPILs) show how federal, state, and other funds will be used to support the state’s independent living (IL) services as well as collaborations with other partners in the state and other U.S. Administration for Community Living (ACL) grantees to enhance and expand service delivery and options for individuals with disabilities.</p> <p>In developing SPILs, Statewide Independent Living Councils (SILCs) must conform to ACL requirements for structure, organization, and content. There is little opportunity for variability in this federally required plan. Most recently, ACL has directed SILCs to move forward with a one-year extension of their current SPILs to support ongoing federal funding.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: The direct benefit of the SPIL one-year extension with minor technical updates is Virginia will continue to receive federal funding (roughly \$474,000 annually) for IL services. With the one-year extension to the SPIL in place, this federal funding will continue to be allocated to the SILC, which develops the SPIL and allocates funding to Virginia’s CILs to provide important services to individuals with disabilities.</p> <p>If the SPIL is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing these federal funds.</p> <p>Indirect Benefits: CILs supplement the federal funding they receive with state funding, private donations, and other grant opportunities. Ensuring that CILs have ongoing federal funding helps preserve continuity of operations and maximize all the funding they are eligible to receive.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$474,000 annually in federal funding</p>
<p>(3) Net Monetized Benefit</p>	<p>\$474,000</p>	

(4) Other Costs & Benefits (Non-Monetized)	N/A
(5) Information Sources	ACL Memo to States (October 2022)

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: ACL has directed SILCs to move forward with a one-year extension of their SPILs to support ongoing federal funding. If the SPIL one-year extension with minor technical updates is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing federal funding (roughly \$474,000 annually) for IL services.</p> <p>Indirect Costs: CILs supplement the federal funding they receive with state funding, private donations, and other grant opportunities. If the SPIL one-year extension is not submitted to ACL, it could jeopardize the continuity of operations afforded to CILs with the ongoing federal funding as well as other funding sources that CILs rely on to provide services to individuals with disabilities.</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$474,000	(b) \$0
(3) Net Monetized Benefit	(\$474,000)	
(4) Other Costs & Benefits (Non-Monetized)	None	
(5) Information Sources	ACL Memo to States (October 2022)	

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

(1) Direct & Indirect Costs & Benefits	Direct Costs: There are not alternative approaches. ACL has directed SILCs to move forward with a one-year extension of their SPILs to support ongoing federal funding.
----------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Benefits (Monetized)	Indirect Costs: N/A	
	Direct Benefits: N/A	
	Indirect Benefits: 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)	N/A	
(5) Information Sources	ACL Memo to States (October 2022)	

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: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: All CILs that receive federal funds are considered local partners and small businesses. They are legally organized as non-profit organizations.</p> <p>The direct benefit of the SPIL one-year extension with minor technical updates is Virginia will continue to receive federal funding (roughly \$474,000 annually) for IL services. With the one-year extension to the SPIL in place, this federal funding will continue to be allocated to the SILC, which develops the SPIL and allocates funding to Virginia’s CILs to provide important services to individuals with disabilities.</p> <p>If the SPIL is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing these federal funds.</p>
----------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	Indirect Benefits: CILs supplement the federal funding they receive with state funding, private donations, and other grant opportunities. Ensuring that CILs have ongoing federal funding helps preserve continuity of operations and maximize all of the potential funding they are eligible to receive.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) \$474,000
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	ACL Memo to States (October 2022)	

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: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: Designed and operated by individuals with disabilities, CILs provide IL services for people with disabilities. CILs are funded through federal and state funding, some of which is allocated by ACL to the SILC, which in turn allocates it to CILs to provide these important IL services to individuals with disabilities.</p> <p>Receiving these IL services can be life changing for individuals with disabilities and their families, ensuring that individuals can continue to live in their homes and be fully integrated into their communities.</p> <p>If the SPIL is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing these federal funds.</p>
----------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	Indirect Benefits: CILs often pair and supplement the federal funding they receive through the SILC and SPIL with state funding, private donations, and other grant opportunities to provide more comprehensive support to individuals with disabilities and their families. Ensuring that CILs have ongoing federal funding helps preserve continuity of operations and maximize all the funding they are eligible to receive, which translates to improved and increased services for individuals and families.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	ACL Memo to States (October 2022)	

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>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: All CILs that receive federal funds are considered local partners and small businesses, and they are legally organized as non-profit organizations.</p> <p>The direct benefit of the SPIL one-year extension with minor technical updates is Virginia will continue to receive federal funding (roughly \$474,000 annually) for IL services. With the one-year extension to the SPIL in place, this federal funding will continue to be allocated to the SILC, which develops the SPIL and allocates funding to Virginia’s CILs to provide important services to individuals with disabilities.</p> <p>If the SPIL is not approved and submitted to ACL for ACL’s approval in a timely manner, Virginia will be at risk of losing these federal funds.</p>
----------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	Indirect Benefits: CILs supplement the federal funding they receive with state funding, private donations, and other grant opportunities. Ensuring that CILs have ongoing federal funding helps preserve continuity of operations and maximize all the funding they are eligible to receive.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) \$474,000
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Alternatives	There are no alternatives. ACL is requiring SILCs to submit a one-year extension of currently approved SPILs.	
(5) Information Sources	ACL Memo to States (October 2022)	

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

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
State Plan for Independent Living (SPIL)	39 pages 13,897	39 pages 13,836 words	0 pages -61 words