Office of Regulatory Management

Economic Review Form

Agency name	Department (Board) of Juvenile Justice
Virginia Administrative Code (VAC) Chapter citation(s)	6 VAC 35-170
VAC Chapter title(s)	Regulation Governing Juvenile Data Requests and Research Involving Human Subjects
Action title	Periodic Review of the Regulation Governing Juvenile Data Requests and Research Involving Human Subjects
Date this document prepared	April 17, 2026
Regulatory Stage (including Issuance of Guidance Documents)	Final Stage

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)	Direct Costs: Although overhauling this chapter as part of its periodic review, the department does not anticipate any direct costs associated with the changes that are being proposed to this chapter. Many proposed changes seek to clarify existing requirements, simplify language, and rearrange provisions, and are not substantive. Other changes incorporate requirements already imposed upon researchers and individuals requesting data pursuant to existing practices, as set out in the current guidance document and in agreements that must be executed as part of the research and data request process. These changes will have no economic impact. Even other changes of a substantive nature, such as those setting out or amending conditions for research and data request approvals, while establishing clear processes for certain research for which no process currently exists, and in some other cases, changing the practices for researchers and individuals requesting data, are not expected to impose any additional expenses or relieve the requester or researcher of any expenses currently incurred. Thus, while the proposal seeks several significant changes to the chapter, none of the changes will have an economic cost or result in any direct economic benefit to affected entities. Indirect Costs: As explained above, similarly, there are no indirect costs associated with any of the proposed changes to this chapter. Direct Benefits: The changes proposed in this action are expected to result in numerous direct benefits to researchers performing research or requesting data from DJJ, as well as to DJJ. Directing relevant state criminal justice agencies to complete required forms as part of the process and other contracted entities to be subject to any or all requirements in this chapter will formalize general department practices that usually involve collection of preliminary information through verbal discussions, emails, other documents requested by the department, or other less formal means. The proposal will give DJJ information necessary to confirm the appropriate process for these entities through a formalized process. The proposal also will help researchers better prepare for data requests before meeting with staff from DJJ's Research Unit. Establishing a clear process for data requests submitted through the Virginia Longitudinal Data System or through data trusts also will benefit other state agencies and the greater Commonwealth by allowing for greater access to and sharing of certain important data across Commonwealth agencies, which will make the provision of government services more efficient. Expanding the data points that may be treated as sensitive based on the likelihood of determining the subject's identity will help ensure the protection of otherwise confidential data and

	records. Striking language that discourages researchers from offering incentives for participation in research will help to remove perceived barriers that may have hindered research efforts. Removing language that parrots a statute in favor of a reference to the statute will make it more likely that entities subject to this chapter will understand the source of regulatory requirements and eliminate the need for the department to update the regulation each time a relevant statutory change occurs. Finally, adding numerous additional provisions that already are a part of the department's practices, as set out in its supplemental guidance document, will ensure these requirements are enforceable. Indirect Benefits: The regulation and proposed amendments are intended to streamline and refine the protocol for submitting and processing data requests and research proposals. These requests and proposals often provide input on ways DJJ can improve its services and programming, which ultimately may help to improve outcomes for youth who interact with the department.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs associated with these proposed changes.	(b) There are no quantifiable direct or indirect benefits associated with the proposed changes.
(3) Net Monetized Benefit	None.	
(4) Other Costs & Benefits (Non-Monetized)	The chief benefit of the proposed changes is that unnecessary and burdensome requirements involved in the process of making data requests and submitting research proposals will be eliminated, while provisions will be clarified to enhance compliance with regulatory requirements.	
(5) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300 of the Code of Virginia	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: There are no direct costs associated with the existing regulatory provisions. The existing regulation sets out processes for requesting data and proposing research projects, and the department is not aware of any costs on regulated entities associated with these processes. Indirect Costs: The department is not aware of any indirect costs associated with the existing regulatory provisions.

	Direct Benefits: There are no quantifiable direct benefits to maintaining the status quo. Maintaining the status quo will mean the process will continue to be fraught with unnecessarily burdensome requirements and unclear provisions that generate confusion among the regulated community. Provisions in the guidance document that provide additional clarity on the process will continue to remain unenforceable. Indirect Benefits: There are no quantifiable indirect benefits to maintaining the status quo.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs associated with maintaining the status quo.	(b) There are no quantifiable direct or indirect benefits associated with maintaining the status quo.
(3) Net Monetized Benefit	None.	
(4) Other Costs & Benefits (Non-Monetized)	The department believes there are no benefits associated with maintaining the status quo, as doing so will mean retaining provisions that may sometimes be deemed burdensome, unnecessary, inconsistent with DJJ practices, and do not provide clear guidance to enhance compliance.	
(5) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300 of the Code of Virginia	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: The department considered, and in some cases, adopted various alternative regulatory methods to accomplish its intended objectives. The proposal includes language allowing for less stringent and simplified reporting and compliance requirements, including allowing the director to waive the inclusion of certain language in research materials, allowing the department to impose only a portion of the requirements in this chapter for certain entities performing research on its behalf, removing requirements to comply with certain standards and processes, allowing for expedited review processes, and imposing upon certain entities the more limited requirement of simply completing forms for informational purposes. The department is not aware of any direct costs associated with adopting these less stringent regulatory provisions. Other alternative approaches include leaving the regulation as is or expanding the guidance document to include additional provisions and

	restrictions. The department believes retaining the regulation as is would not result in additional costs or generate additional revenue for the regulated community; nor would expanding the guidance document to include the additional proposed provisions. Furthermore, expanding the guidance document would not be helpful since any requirements added to the document are not enforceable unless they also are included in the regulation. Indirect Costs: The department does not believe there are any indirect costs associated with adopting the alternative approaches described above. Direct Benefits: The department does not believe any of the alternative approaches described above would provide the direct benefits anticipated with the proposed amendments. Indirect Benefits: The department does not believe the alternative approaches described above would provide any indirect benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs associated with adopting the alternative approaches described in this section.	(b) There are no quantifiable direct or indirect benefits associated with adopting the alternative approaches described in this section.
(3) Net Monetized Benefit	None.	
(4) Other Costs & Benefits (Non-Monetized)	None.	
(5) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300.	

<u>Impact on Local Partners</u>

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)	Direct Costs: While the proposal is expected to impact locally operated detention centers, group homes, and other Board of Juvenile Justice-regulated facilities, the department does not expect such local facilities to incur additional expenses or fees or experience any savings resulting

	from the regulatory changes. Nor is the proposal expected to have a direct, meaningful impact on local revenues. Indirect Costs: The department does not anticipate any indirect costs to localities associated with the proposed changes. Direct Benefits: The regulatory changes are designed to clarify and simplify the protocol for processing data requests and research proposals, which may involve residents in locally and regionally operated juvenile detention centers and group homes. Clarifying these processes will indirectly benefit these facilities by enhancing their compliance with the regulatory requirements imposed in this chapter. Indirect Benefits: Research involving juvenile facilities and programs generally are intended to inform researchers regarding how to improve programming and services to enhance outcomes for juvenile residents. Thus, local facilities that house juveniles and allow their residents to participate in human research projects may experience some indirect benefits in improved programming and services and more successful outcomes as a result of findings from such research.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs to localities associated with the proposed changes.	(b) There are no quantifiable direct or indirect benefits to localities associated with the proposed changes.
(3) Other Costs & Benefits (Non-Monetized)	None.	
(4) Assistance	Because the department does not anticipate any costs associated with the proposed changes, no economic assistance would be needed to carry out the regulatory amendments.	
(5) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300.	

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 &	Direct Costs: The department does not anticipate any direct costs to families resulting from the proposed changes. The proposed changes will

Benefits (Monetized)	not affect the cost of food, energy, housing, transportation, healthcare, education, or other goods or services important to families. Indirect Costs: The department does not anticipate any indirect costs to families resulting from the proposed changes. Direct Benefits: The current regulation in 6VAC35-170-10 defines "human subject" to include, "a member of the family of an individual under DJJ's care, custody, or supervision, or that of a facility or program regulated by DJJ or the Board of Juvenile Justice. Thus, the current regulation has the potential to directly impact family members of such juveniles to the extent they are used as subjects in a human research project. Because the regulation provides clarity regarding the process for conducting human research, it may benefit family members who are "human subjects" in these projects. Indirect Benefits: Research involving juvenile facilities and programs generally are intended to inform researchers on how to improve programming and services to enhance outcomes for juvenile residents and their families. Thus, juvenile clients and their families who participate in research projects or who are the subject of data requests may experience some indirect benefits in improved programming and services resulting from research findings, which may lead to more successful outcomes for these youth.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs to families associated with the proposed changes.	(b) There are no quantifiable direct or indirect benefits to families associated with the proposed changes.
(3) Other Costs & Benefits (Non-Monetized)	None.	
(4) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300 of the Code of Virginia	

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 &	Direct Costs: The department does not expect small businesses to incur any direct costs resulting from the proposed changes.

Benefits (Monetized)	Indirect Costs: The department does not expect small businesses to incur any indirect costs resulting from the proposed changes. Direct Benefits: The department is not aware of any monetized direct benefits the proposed change will generate. Indirect Benefits: The department is not aware of any monetized indirect benefits the proposed change will generate.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) There are no quantifiable direct or indirect costs associated with the proposed changes.	(b) There are no quantifiable direct or indirect benefits associated with the proposed changes.
(3) Other Costs & Benefits (Non-Monetized)	Many proposed changes seek to reduce the burden on small businesses by removing some unnecessary requirements, such as asking for numerous paper copies of report submissions and expecting researchers to stay current on various ethical standards of professional societies as a regulatory requirement. Furthermore, specifying processes for various types of projects not currently established will eliminate uncertainty and make such processes more efficient for the regulated community.	
(4) Alternatives	The department considered, and in some cases, adopted various alternative methods to accomplish its intended objectives. The proposal includes language allowing for less stringent and simplified reporting and compliance requirements, including allowing the director to waive the inclusion of certain language in research materials, allowing the department to impose only a portion of the requirements in this chapter for certain entities performing research on its behalf, removing requirements to comply with certain standards and processes, allowing for expedited review processes, and imposing upon certain entities the more limited requirement of simply completing forms for informational purposes. The department is not aware of any direct costs associated with adopting these less stringent regulatory provisions. The department also considered expressly exempting small businesses from the reach of this chapter but ultimately opted not to do so. While there would be no costs associated with adopting this alternative, the department determined that, in the rare event a small business performs research or seeks departmental data, making such entities subject to this chapter will ensure confidentiality and other protections of juvenile subjects while placing minimal additional responsibilities on the researcher or entity seeking data.	
(5) Information Sources	6VAC35-170 Guidance Document Supplementing 6VAC35-170 § 16.1-300 of the Code of Virginia	

<u>Changes to Number of Regulatory Requirements</u>

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
6VAC35-170-10	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-170-15	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-170-17	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**0**	2	0	+2
6VAC35-170-20	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**4**	0	2	-2
6VAC35-170-30	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	1	-1
6VAC35-170-40	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	1	0	+1
	(D/R):	**3**	0	2	-2
6VAC35-170-50	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	0	1	-1

	(M/R):	**0**	0	0	0
	(D/R):	**3**	0	1	-1
6VAC35-170-55	**(M/A):**	**0**	0	0	0
	(D/A):	**7**	0	7	-7
	(M/R):	**0**	0	0	0
	(D/R):	**4**	0	4	-4
6VAC35-170-60	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	5	+5
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	10	+10
6VAC35-170-65	**(M/A):**	**0**	0	0	0
	(D/A):	**36**	0	9	-9
	(M/R):	**0**	0	0	0
	(D/R):	**18**	0	9	-9
6VAC35-170-67	**(M/A):**	**0**	0	0	0
	(D/A):	**6**	0	3	-3
	(M/R):	**0**	0	0	0
	(D/R):	**7**	0	4	-4
6VAC35-170-69	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-170-70	**(M/A):**	**1**	0	1	-1
	(D/A):	**0**	1	0	+1
	(M/R):	**2**	0	1	-1
	(D/R):	**3**	2	0	+2
6VAC35-170-80	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**6**	0	5	-5
	(D/R):	**3**	0	3	-3
6VAC35-170-90	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0

	(D/R):	**0**	0	0	0
6VAC35-170-100	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**13**	0	0	0
6VAC35-170-110	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	0	3	-3
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-170-125	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	6	0	+6
	(M/R):	**0**	0	0	0
	(D/R):	**0**	8	0	+8
6VAC35-170-130	**(M/A):**	**2**	0	1	-1
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	1	-1
6VAC35-170-140	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	0	0
6VAC35-170-150	**(M/A):**	**8**	0	0	-7
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**8**	0	8	-8
6VAC35-170-160	**(M/A):**	**5**	0	4	-4
	(D/A):	**1**	0	0	0
	(M/R):	**2**	0	1	-1
	(D/R):	**0**	0	0	0
6VAC35-170-170	**(M/A):**	**1**	0	1	-1
	(D/A):	**4**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	0	0

6VAC35-170-180	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	0	0
6VAC35-170-185	**(M/A):**	**1**	0	1	-1
	(D/A):	**1**	0	1	-1
	(M/R):	**1**	0	1	-1
	(D/R):	**4**	1	0	+1
6VAC35-170-190	**(M/A):**	**1**	1	0	+1
	(D/A):	**2**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-170-200	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**2**	0	0	0
6VAC35-170-210	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	1	-1
6VAC35-170-220	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**2**	0	0	0
6VAC35-170-230	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
				Grand Total of Changes in Requirements:	**(M/A): -14**
					(D/A): -15
					(M/R): -7
					(D/R):-13

Key:

Please use the following coding if change is mandatory or discretionary and whether it affects externally regulated parties or only the agency itself:
(M/A): Mandatory requirements mandated by federal and/or state statute affecting the agency itself
(D/A): Discretionary requirements affecting agency itself
(M/R): Mandatory requirements mandated by federal and/or state statute affecting external parties, including other agencies
(D/R): Discretionary requirements affecting external parties, including other agencies

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
170-17	This new section allows DJJ to apply a portion or all the chapter's requirements when DJJ asks an outside agency to research or evaluate the department. Additionally, the section directs state criminal justice agencies to complete and submit specified department forms as a means of confirming the request and verifying the entity is a state criminal justice agency.	These changes establish a formal, consistent process for the department to address these types of requests. Historically, these requests were handled on a case-by-case basis, often through similar measures. The department expects some increased regulatory burden but anticipates the increase will be minimal.
170-20	The proposal amends the regulation, such that the project lead must possess the requisite qualifications and can no longer allow another entity to serve in that capacity, even if supervised by individuals with the requisite standing or job-related experience.	Because the change prevents individuals who lack the required standing to serve as principals under the supervision of a qualifying individual, this will increase the regulatory burden; however, the change operationalizes DJJ's current practices.
170-30	The proposal repeals the provision requiring all research to conform with standards of ethics of professional societies.	Because researchers will no longer be subject to this requirement, this constitutes a decrease in stringency.
170-55	The proposal repeals the provision establishing a process for reviewing aggregate data requests.	As requesters will no longer be subject to these regulatory restrictions, this constitutes a decrease in regulatory burden.

170-60	The proposal expands the regulation to require quality or process improvement project requests be initiated by completing and signing various specified forms.	As entities engaged in such projects are not subject to these requirements under the existing regulation, the change will result in a minor increase in stringency.
170-60	The proposal adds a new subsection requiring the Confidentiality Agreement to be signed by every individual who may access the data.	Because this is not a current regulatory requirement, this may be seen as an increase in stringency; however, this aligns with existing agency practices.
170-60	The proposal replaces language in another section requiring the Research Agreement to specify how frequently progress reports will be required with language in this section directing the researcher to agree to provide annual progress reports, along with any additional progress reports mandated by DJJ.	This language could be perceived as more stringent because it mandates that the researcher provide annual progress reports, along with additional progress reports, as specified by DJJ. This change operationalizes existing requirements.
170-65	The proposal adds a new subsection authorizing DJJ to consider additional identifiers as sensitive and mandating removal of such identifiers from the data set.	This change could be perceived as increasing the regulatory burden, given that the data provided to the researcher or requester would be restricted, based on this requirement. This change aligns with the department's existing practices.
170-67	The proposal strikes the provisions requiring requests for external case-specific data submitted through the VLDS to use the VLDS portal, comply with the conditions for department approval of external research in Section 50, and adhere to VLDS procedures for accessing VLDS data.	The proposal strikes these provisions as unnecessary in the context of VLDS requests and outside the scope of what DJJ should be regulating. The department believes eliminating these requirements will amount to a decrease in regulatory stringency.
170-70	The proposal replaces language indicating that incentives for research participation are discouraged with language expressly permitting such incentives provided certain requirements are met.	Because the provision removes the language discouraging these incentives, this amounts to a minor decrease in regulatory stringency.

170-70	The proposal requires endorsement from an Institutional Review Board for human research not exempted by § 32.1-162.17 of the Code.	This change will amount to an increase in regulatory stringency; however, the language is consistent with current DJJ practices.
170-60; 170-125	The proposal expands the regulation to require quality or process improvement project requests be initiated by completing and signing the three specified DJJ forms. Additionally, it establishes a new section creating a process for quality or process improvement projects.	These changes will amount to an increase in regulatory stringency, as the department does not currently have a formalized process in place to address quality or process improvement projects. The number of such projects that are submitted is negligible.
170-185	The proposal adds a new subsection B directing the project lead to report protocol violations to the coordinator of external research within five business days of becoming aware of the violation.	This will amount to an increase in regulatory stringency; however, the change is consistent with current practices.
170-200	The proposal adds provisions giving the DJJ director discretion to reconsider, reassess, or rescind a research proposal approval based on information in the progress report or the entity's failure to file a progress report in a timely manner.	The department believes this change, while not imposing additional requirements on the regulated community, will amount to an increase in stringency, as a denial from the director would prevent the regulated entity from moving forward with their research.
170-210	Repeals the provision directing the research agreement to give the department unrestricted permission to use data, summaries, charts, graphs, or other illustrations resulting from the research project.	This will amount to a minor decrease in stringency, as the proposal removes this restriction, currently required as part of the Research Agreement.
170-220	Removes language allowing DJJ to require up to 10 copies of the formal final report that must be submitted to the coordinator of external research. The change also gives the director authority to waive a	Both changes will amount to a minor decrease in regulatory stringency. DJJ no longer requires manual/hard copies of reports. Furthermore, the director's ability to waive this statement is consistent with existing practices.

	statement that the researcher must include in its final report.	
170-220	The proposal adds a deadline for electronic submission of the articles, reports, presentation, publications, and final report to the coordinator of external research.	The department believes specifying a date for the electronic submission of these documents will amount to a minor increase in regulatory burden; however, the change aligns with current practices.

Length of Guidance Documents (only applicable if guidance document is being revised)

Title of Guidance Document	**Original Word Count**	**New Word Count**	**Net Change in Word Count**
Guidance Document Interpreting 6VAC35-170	6478	5,288	-1190

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