Office of Regulatory Management

Economic Review Form

Agency name	Department (Board) of Juvenile Justice
Virginia Administrative Code (VAC) Chapter citation(s)	6 VAC 35-71
VAC Chapter title(s)	Regulation Governing Juvenile Correctional Centers
Action title	Comprehensive review of regulatory provisions governing juvenile correctional centers
Date this document prepared	October 15, 2024; Updated April 24, 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: The direct costs are derived from the FY 2024 annual JCC direct care operating expenditures for DJJ as coded in the financial system of record. Plus, the following regulation updates that equal a $720k annual increase: 1. 6VAC35-71-765 – assumes an increase with administrative costs to plan and execute additional family related activities equal to $61,700 statewide. The benefit will ensure that each JCC is prioritizing family engagement events and inclusion in every facet of the resident's tenure in a JCC. This cost assumes one major event per quarter, annually. 2. 6VAC35-71-815 - assumes an increase for the purchase of new software for electronic resident logs. Analysis assumes 36 supervisory staff will need access to software at the going rate of software licensures per user plus upfront implementation costs, totaling $30,240 annually. This increase assumes the JCC staff exercises their discretion to utilize electronic logs. 3. 6VAC35-71-1110 – assumes an increase for storage costs related to record retention totaling $93,500 for additional industrial rolling file system. 4. 6VAC35-71-1180 – assumes an increase with training and documentation of procedures related to utilizing spit guards equal to $186,952 statewide. $140k is related to cost of formal training per employee and $47k is related to staff time cost to attend training. The benefit will help to reduce the use of mechanical restraints and protective devices, control the duration of such use, and ensure that such devices are used in the safest manner. 5. 6VAC35-71-160 and 6VAC35-71-170 – assumes an increase with mandated training, documentation of procedures and certifications for medical staff equal to $172,944 statewide. 6. 6VAC35-71-185 – assumes an increase in tuberculosis screening/testing for contractors equal to $7,000 annually.

	7. 6VAC35-71-230 and 6VAC35-71-240 – assumes an increase with training and background checks for volunteers and interns equal to $167,841 statewide. $144k is related to staff time cost to process checks and provide training. Direct Benefits: The benefit is calculated by applying the DOT value of statistical life ($11.8m) reduced by the EPA mortality risk valuation rate ($7.4m) for a difference of $4.4m and multiplied by the BAJCC Annual Daily Population (ADP) rate of 283 reported for FY 2024.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
(a) $648,713,814 (b) $10,940,462,830	(a) $741,912,066	(b) $12,452,000,000
(3) Net Monetized Benefit	$10,291,749,016	
(4) Other Costs & Benefits (Non-Monetized)	Cost Benefits Ratio = 16.86; Assumes Discount Rate of 3% Cost benefit analysis calculations assume an additional two percent COLA increase per year over 10-year timeframe to operating costs.	
(5) Information Sources	All calculations are direct costs. There are no anticipated indirect costs or benefits as a result of the proposed regulatory changes governing juvenile correctional centers. JCC's total operating expenditures of direct care for FY 2024 applied for Year Zero plus anticipated costs for the regulatory changes that will have anticipated economic impact increase. JCC direct care operating costs for positions, market value analysis for training and software costs.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: The direct costs are derived from the FY 2024 annual JCC direct care operating expenditures for DJJ as coded in the financial system of record. Direct Benefits: The benefit is calculated by applying the DOT value of statistical life ($11.8m) reduced by the EPA mortality risk valuation rate ($7.4m) for a difference of $4.4m and multiplied by the BAJCC Annual Daily Population (ADP) rate of 283 reported for FY 2024.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits

(a) $641,818,665 (b) $10,940,462,830	(a) $734,026,318	(b) $12,452,000,000
(3) Net Monetized Benefit	$10,298,644,164	
(4) Other Costs & Benefits (Non-Monetized)	Cost Benefits Ratio = 17.05; Assumes Discount Rate of 3% Cost benefit analysis calculations assume an additional two percent COLA increase per year over 10-year timeframe to operating costs.	
(5) Information Sources	All calculations are direct costs. There are no anticipated indirect costs or benefits as a result of the proposed regulatory changes governing juvenile correctional centers. JCC's total operating expenditures of direct care for FY 2024 applied for Year Zero.	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: N/A. Indirect Costs: N/A. Direct Benefits: N/A. Indirect Benefits: N/A.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
N/A	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources	N/A	

<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 &	Direct Costs: There are no direct costs to local partners associated with the proposed changes.

Benefits (Monetized)	Indirect Costs: There are no indirect costs to local partners associated with the proposed changes. Direct Benefits: There are no monetary direct benefits associated with the proposed changes. Indirect Benefits: There are no monetary indirect benefits associated with the proposed changes.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
N/A	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	There are no anticipated costs or benefits to local partners as a result of the proposed regulatory changes governing juvenile correctional centers.	

<u>Impacts on Families</u>

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)	Direct Costs: There are no direct costs to families associated with the proposed regulatory changes. Indirect Costs: There are no indirect costs to families associated with the the proposed regulatory changes. Direct Benefits: There are no direct monetary benefits to families associated with the proposed regulatory changes. Indirect Benefits: There are no indirect monetary benefits to families associated with the proposed regulatory changes.

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
N/A	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Information Sources	There are no anticipated costs or benefits to families as a result of the proposed regulatory changes governing juvenile correctional centers.	

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)	Direct Costs: There are no direct costs to small businesses associated with the proposed regulatory amendments. Indirect Costs: There are no indirect costs to small businesses associated with the proposed regulatory amendments. Direct Benefits: There are no direct monetary benefits to small businesses associated with the proposed regulatory amendments. Indirect Benefits: There are no indirect monetary benefits to small businesses associated with the proposed regulatory amendments.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
N/A	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Alternatives	N/A	
(5) Information Sources	There are no anticipated costs or benefits to small businesses as a result of the proposed regulatory changes governing juvenile correctional centers.	

<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
6VAC35-71-50	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	2	0	+2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-60	**(M/A):**	**0**	0	0	0
	(D/A):	**14**	4	0	+4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-90	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-110	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	2	0	+2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-150	**(M/A):**	**0**	0	0	0
	(D/A):	**17**	0	5	-5
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-160	**(M/A):**	**2**	0	0	0
	(D/A):	**20**	8	0	+8
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-170	**(M/A):**	**0**	0	0	0
	(D/A):	**20**	7	0	+7
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-215	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	2	0	+2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-220	**(M/A):**	**0**	0	0	0
	(D/A):	**4**	1	0	+1
	(M/R):	**0**	0	0	0

	(D/R):	**0**	0	0	0
6VAC35-71-260	**(M/A):**	**2**	0	0	0
	(D/A):	**8**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-480	**(M/A):**	**0**	1	0	+1
	(D/A):	**12**	0	5	-5
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-500	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-510	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-540	**(M/A):**	**0**	0	0	0
	(D/A):	**4**	3	0	+3
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-545	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	11	0	+11
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-550	**(M/A):**	**8**	0	0	0
	(D/A):	**5**	3	0	+3
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-555	**(M/A):**	**1**	2	0	+2
	(D/A):	**2**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-560	**(M/A):**	**0**	0	0	0
	(D/A):	**13**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-580	**(M/A):**	**0**	0	0	0
	(D/A):	**7**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-590	**(M/A):**	**4**	0	0	0
	(D/A):	**1**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0

6VAC35-71-660	**(M/A):**	**0**	0	0	0
	(D/A):	**8**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-680	**(M/A):**	**0**	0	0	0
	(D/A):	**20**	3	0	+3
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-690	**(M/A):**	**0**	0	0	0
	(D/A):	**6**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-710	**(M/A):**	**0**	0	0	0
	(D/A):	**4**	2	0	+2
	(MR):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-720	**(M/A):**	**0**	0	0	0
	(D/A):	**17**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-745	**(M/A):**	**0**	0	0	0
	(D/A):	**7**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-765	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	4	0	+4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-770	**(M/A):**	**0**	0	0	0
	(D/A):	**6**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-790	**(M/A):**	**0**	0	0	0
	(D/A):	**25**	0	4	-4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-815	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-820	**(M/A):**	**0**	0	0	0
	(D/A):	**13**	5	0	+5
	(M/R):	**0**	0	0	0

	(D/R):	**0**	0	0	0
6VAC35-71-830	**(M/A):**	**1**	1	0	+1
	(D/A):	**2**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-860	**(M/A):**	**1**	0	0	0
	(D/A):	**17**	2	0	+2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-890	**(M/A):**	**2**	0	0	0
	(D/A):	**1**	1	0	+2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-900	**(M/A):**	**0**	0	0	0
	(D/A):	**14**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-970	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1020	**(M/A):**	**1**	0	0	0
	(D/A):	**22**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1030	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1060	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1110	**(M/A):**	**0**	0	0	0
	(D/A):	**35**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1120	**(M/A):**	**0**	0	0	0
	(D/A):	**6**	0	1	-1
	(M/R):	**0**	0	0	0

	(D/R):	**0**	0	0	0
6VAC35-71-1130	**(M/A):**	**0**	0	0	0
	(D/A):	**18**	0	18	-18
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1140	**(M/A):**	**0**	0	0	0
	(D/A):	**14**	30	0	+30
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1150	**(M/A):**	**0**	0	0	0
	(D/A):	**4**	0	4	-4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1160	**(M/A):**	**0**	0	0	0
	(D/A):	**4**	0	4	-4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1175	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	16	0	+16
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1180	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	16	0	+16
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1190	**(M/A):**	**0**	0	0	0
	(D/A):	**9**	4	0	+4
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1195	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1200	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	0	3	-3
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0

6VAC35-71-1203	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	19	0	+19
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1205	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	9	0	+9
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1206	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	7	0	+7
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1207	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	5	0	+5
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1208	**(M/A):**	**0**	0	0	0
	(D/A):	**0**	1	0	+1
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1209	**(M/A):**	**0**	9	0	+9
	(D/A):	**0**	0	0	0
	(M/R):	**0**	0	0	0
	(D/R):	**0**	0	0	0
6VAC35-71-1240	**(M/A):**	**0**	0	0	0
	(D/A):	**2**	0	2	-2
	(M/R):	**0**	0	0	0
	(D/R):	**2**	0	2	-2
6VAC35-71-1250	**(M/A):**	**0**	0	0	0
	(D/A):	**3**	0	3	-3
	(M/R):	**0**	0	0	0
	(D/R):	**3**	0	3	-3
6VAC35-71-1260	**(M/A):**	**0**	0	0	0
	(D/A):	**1**	0	1	-1
	(M/R):	**0**	0	0	0
	(D/R):	**1**	0	1	-1
6VAC35-71-1270	**(M/A):**	**0**	0	0	0
	(D/A):	**6**	0	6	-6
	(M/R):	**0**	0	0	0
	(D/R):	**6**	0	6	-6
					(M/A): +13
					(D/A): +107

Grand Total of Changes in Requirements:	**(M/R):0**
	(D/R):-12

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