

Office of Regulatory Management
Economic Review Form

Agency name	Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22 VAC 30-20
VAC Chapter title(s)	Vocational Rehabilitation Policy and Procedure Manual • Chapter 1.2 – Liability • Chapter 1.3 – Casefile • Chapter 8.02 – Rehabilitation Technology • Chapter 8.13 – Personal Assistance Services • Chapter 8.21 – Vehicle, Aircraft, Boat
Action title	Vocational Rehabilitation Policy and Procedure Manual: Revision to Selected Chapters
Date this document prepared	April 20, 2026
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.

Background: The Vocational Rehabilitation (VR) program is the largest program operated by the Department for Aging and Rehabilitative Services (DARS). The agency's Division of Rehabilitative Services (DRS) is responsible for administering the program, which provides VR services to individuals with disabilities to help them prepare for, secure, regain or retain employment. Administration of the VR program is directed heavily by federal statutory and regulatory requirements. For federal fiscal years 2024-2026, DARS received or will receive an estimated \$72,740,773 per year.

The VR Policy and Procedure Manual (also referred to as the DRS Policy and Procedure Manual) builds upon federal regulatory requirements found at 34 CFR Part 361 and state regulations found in 22VAC30-20 and provides guidance for VR consumers as well as the 775 DARS employees who support the VR program.

The proposed changes to the Manual are summarized below:

- **Chapter 1.2 – Liability:** Clarifies language regarding the scope of the specialty health insurance policy DRS maintains for certain VR clients.
- **Chapter 1.3 – Casefile:** Memorializes longstanding policy guidance regarding the retention of sensitive client information, such as copies of Social Security cards.
- **Chapter 8.02 – Rehabilitation Technology:** Updates language regarding comparable benefits to bring guidance into alignment with federal regulation.
- **Chapter 8.13 – Personal Assistance Services:** Updates language to reflect the accurate reference for the Personal Assistance Services rate.
- **Chapter 8.21 – Vehicle, Aircraft, Boat:** Updates language regarding comparable benefits to bring guidance into alignment with federal regulation.

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	

(4) Other Costs & Benefits (Non-Monetized)	Ensures the Vocational Rehabilitation Policy and Procedure Manual filed on the Town Hall website is updated and consistent with current regulations and provides the VR staff, consumers, the public, and stakeholders with a clear and publicly accessible location for the VR policies and procedures. This advances ORM's goals of streamlined access and transparency. In addition, the clarification of language simplifies guidance and reduces the administrative burden on service providers.
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	If the Vocational Rehabilitation Policy and Procedure Manual is not updated on Town Hall to reflect current practices and regulations, it has the potential to create confusion among VR staff, consumers, the public, and other stakeholders, and runs contrary to ORM's goals of streamlined access and transparency.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0
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	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	N/A	
(5) Information Sources		

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)	Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Ensuring the Vocational Rehabilitation Policy and Procedure Manual filed on the Town Hall website is updated and consistent with current practices and regulations provides the VR staff, consumers, the public, and stakeholders with a clear and publicly accessible location for the Vocational Rehabilitation policies and procedures. This advances ORM's goals of streamlined access and transparency. In addition, the clarification of language simplifies guidance and reduces administrative burden on service providers.	

(4) Assistance	
(5) Information Sources	

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)	VR services provide vocational counseling, training, and other job placement and retention services for individuals with disabilities so they can get ready for, find, and keep a job. Receiving VR services can be life-changing for individuals with disabilities and their families. They can ensure individuals gain more confidence and independence through earning their own income and help support economic self-sufficiency. Direct Costs: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Having a clear and up-to-date VR Manual provides clarity to VR clients, their families, and the public on the provision of VR services and eligibility for VR services.	
(4) Information Sources		

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: \$0 Indirect Costs: \$0 Direct Benefits: \$0 Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	Providing an up-to-date and accurate manual ensures that small businesses associated with the VR program can access usable information regarding program parameters.	
(4) Alternatives		
(5) Information Sources		

Changes to Number of Regulatory Requirements

Table 5: Regulatory Reduction

For each individual action, please fill out the appropriate chart to reflect any change in regulatory requirements, costs, regulatory stringency, or the overall length of any guidance documents.

Change in Regulatory Requirements

VAC Section(s) Involved*	Authority of Change	Initial Count	Additions	Subtractions	Total Net Change in Requirements
	(M/A):				
	(D/A):				
	(M/R):				
	(D/R):				
				Grand Total of Changes in Requirements:	(M/A): (D/A): (M/R): (D/R):

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

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 Word Count	New Word Count	Net Change in Word Count
Vocational Rehabilitation Policy and Procedures Manual	4,412	4,465 words	+53

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