

Office of Regulatory Management
Economic Review Form

Agency name	Department of Medical Assistance Services
Virginia Administrative Code (VAC) Chapter citation(s)	N/A
VAC Chapter title(s)	N/A
Action title	Mental Health Services Manual, Appendix D
Date this document prepared	11/15/2023
Regulatory Stage (including Issuance of Guidance Documents)	Issuance of Guidance Document

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>These revisions update and clarify the manual text. Text was also reorganized. The benefit is that the updated language and clarifications will provide clarity to the regulatory community. There are no costs associated with the changes.</p> <p>Specific changes that were made include:</p> <p><i>MST and FFT sections</i></p> <ul style="list-style-type: none"> • Language detailing specific provider requirements of MST Services, Inc and FFT, LLC has been removed. <ul style="list-style-type: none"> ○ MST providers are required to maintain an active certification and follow all certification requirements of MST Services, Inc. but should refer to MST Services, Inc. for details of these requirements. ○ FFT providers are required to maintain an active certification with FFT, LLC. and follow all certification requirements of FFT, LLC. but should refer FFT, LLC for details of these requirements. • MST and FFT specific assessments approved by DMAS were added as an allowed alternative to the comprehensive needs assessment. • Language related to concurrent service authorization allowances was clarified and updated for consistency between services. • Added links to the MST Services and FFT, LLC websites. <p><i>Applied Behavior Analysis (ABA)</i></p> <ul style="list-style-type: none"> • Clarifications were made to staff supervision requirements and supervision requirements of services by the licensed professional. • Updates were made to the ABA CPT codes allowed in Psychiatric Residential Treatment Facility and Therapeutic Group Home settings to include coverage of CPT codes provided by licensed professionals. • Language related to general provider requirements for assessments, individual service plans and care coordination was removed because this language is contained in Chapter 4 of this manual. • Language related to concurrent service authorization allowances was clarified and updated for consistency between services. 	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) Outdated language will be removed and the updated and clarifying language will provide clarity to the regulatory community.</p>

(3) Net Monetized Benefit	N/A
(4) Other Costs & Benefits (Non-Monetized)	N/A
(5) Information Sources	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Leaving the document without changes will mean that the outdated language remains in place.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)		
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	There are no alternative approaches.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Net Monetized Benefit		

(4) Other Costs & Benefits (Non-Monetized)	
(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)	There is no impact on local partners.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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)	There is no impact on families.
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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)	There is no impact on small businesses.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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.

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

Title of Guidance Document	Original Length	New Length	Net Change in Length
Mental Health Services Manual, Appendix D	13,045	9,562	-3,483