

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Department for Aging and Rehabilitative Services
Virginia Administrative Code (VAC) Chapter citation(s)	22VAC30-20
VAC Chapter title(s)	Guidance Document: Work Incentives Specialist Advocate (WISA) Manual
Action title	Update WISA Manual
Date this document prepared	November 30, 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.

Background: The federal Ticket to Work and Work Incentives Improvement Act of 1999 allows the Social Security Administration (SSA) to authorize and fund the Work Incentives Planning and Assistance (WIPA) program. Because there are a limited number of WIPA projects around the state and the demand for work incentives and benefits counseling often exceeds the staffing resources that the WIPA project has, the Department for Aging and Rehabilitative Services (DARS) has integrated the Work Incentives Specialist Advocate (WISA) program into our vocational rehabilitation services model.

Trained WISA staff are authorized by DARS, the Department for the Blind and Vision Impaired (DBVI), and the Department of Behavioral Health and Developmental Services (DBHDS) to provide clear explanations about Social Security Disability Insurance (SSDI) and/or Supplemental Security Income (SSI) benefits to individuals who receive them and to client advocates, referring DARS Counselors, DBVI Counselors, and Case Managers. WISA certified staff help explain the effects earned income will have on the client's benefits, and health insurance, such as Medicaid and Medicare, the availability of work incentives to help the individual transition from benefits to self-sufficiency, and how clients can protect their health insurance benefits while they work. Once these issues have been addressed, individuals can make informed decisions about going to work. Virginia WISAs use [WorkWORLD for the Web](#) (WW), an online, Virginia specific program that provides accurate information on how a SSDI/SSI client's financial circumstances will change once they go to work.

This WISA Manual provides information about and requirements for the WISA contracted programs and billable services, vocational rehabilitation (VR) counselor procedures, and samples of forms for WISAs and VR counselors. The changes to the WISA Manual include:

- **Title Page:** Updated to current date.
- **Page 3:** Replaced phone number to reflect new number. Also replaced phone number on page 13. Removed reference to rate updates as they are now available via a link to the 2024 SSA rate updates document on the DARS website.
- **Page 6:** Replaced link to the Benefits Planning Query (BPQY) handbook.
- **Page 7:** Removed income and resource limits for 1619(b) Medicaid. These can be found via the SSA website.
- **Page 7-8:** Removed Student Earned Income Exclusion (SEIE) monthly/annual rates. These can be found on the DARS website.
- **Page 13:** Replaced link to Individual Development Account (IDA) question and answer page.
- **Page 16:** Removed references to the annual contribution limit for ABLE and the cumulative limit for clients who receive SSI and who have ABLE accounts. These limits are set by Congress and do not typically change without an act of Congress.
- **Page 30:** Removed Medicaid Works income and resource rates. These can be found through the Department of Medical Assistance Services (DMAS) website.
- **Page 31:** Added link to Virginia's Medicaid Works information page.

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)	Non-Monetized Benefits: Ensuring that the WISA Manual filed on the Town Hall website is updated and consistent with current SSA and Medicaid rates and DARS/WISA practices provides the WISA and VR staff, public, and stakeholders with a clear and publicly accessible location for the WISA Manual policies and procedures. This advances ORM's goals of streamlined access and transparency. In addition, the elimination of the rates directly in the WISA Manual reduces administrative burden on DARS to update the WISA Manual every year and ensures the manual remains updated when the SSA and Medicaid rates/limits change, as links to the appropriate rate changes are provided in the manual.	
(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)	Non-Monetized Costs: If the WISA Manual is not updated on Town Hall to reflect current SSA and Medicaid rates and practices and information, the WISA Manual filed on Town Hall will be outdated and inaccurate. This inconsistency has the potential to create confusion among WISA and VR staff, 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)	There are no alternatives that result in updating this existing guidance document. 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)	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)	<p>DARS maintains a network for 120 certified WISAs statewide. There are an additional 30 more in process of being certified to provide WISA services.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>Non-Monetized Benefits: Ensuring that the WISA Manual filed on the Town Hall website is updated and consistent with current SSA and Medicaid rates and DARS/WISA practices provides the WISA certified vendors, public, and other stakeholders with a clear, current and publicly accessible location for the WISA Manual policies and procedures. This advances ORM's goals of streamlined access and transparency.</p>	
(4) Assistance	N/A	
(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)	<p>The WISA Program helps individuals and their families who are receiving SSDI or SSI benefits better understand the effects earned income will have on their benefits and supports the transition to self-</p>
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	<p>sufficiency. Through the WISA Program, individuals can make informed decisions about going to work and how much they want to work.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p> <p>Indirect Benefits: \$0</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	<p>Non-Monetized Benefits: Ensuring that the WISA Manual filed on the Town Hall website is updated and consistent with current SSA and Medicaid rates and DARS/WISA practices provides the WISA certified vendors, public, and other stakeholders with a clear and publicly accessible location for the WISA Manual policies and procedures. This advances ORM's goals of streamlined access and transparency.</p>	
(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)	<p>Some, but not all, of the WISA certified vendors are small businesses. Our 120 vendors work across 40 different partner organizations. These partners work in for profit LLCs, independent living centers, Social Security Ticket to Work (TTW) Employment Networks (ENs), and Community Service Board (CSB) organizations.</p> <p>Direct Costs: \$0</p> <p>Indirect Costs: \$0</p> <p>Direct Benefits: \$0</p>
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	Indirect Benefits: \$0	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	\$0	
(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	Net Change
	Statutory:				
	Discretionary:				
				Total Net Change of Statutory Requirements:	
				Total Net Change of Discretionary Requirements:	

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
WISA Manual	51 pages	51 pages	0

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