

Office of Regulatory Management
Economic Review Form

Agency name	Virginia Board of Education
Virginia Administrative Code (VAC) Chapter citation(s)	8 VAC 20-781 [proposed]; 8 VAC 20-780 [repeal]
VAC Chapter title(s)	Standards for Licensed Child Day Centers [proposed]; Standards for Licensed Child Day Centers [repeal]
Action title	Action to adopt new Standards for Licensed Child Day Centers
Date this document prepared	October 24, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Proposed

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>Direct Costs: The direct monetized costs for each licensed child day center, includes the following estimated net cost of:</p> <ul style="list-style-type: none"> • \$1657.89 for staff time to complete training and materials costs to stock epinephrine. • \$331.30 for staff time on administrative duties associated with reviewing children’s records. • \$52.15 for staff time to complete program-based orientation. • \$52.59 for staff time to complete VDOE prelicensure orientation. • \$64.32 in materials costs for restroom supplies. • \$87.50 in staff time and materials to launder classroom items. • \$414.00 for the purchase of rest mats. • \$41.28 in materials for diapering supplies. • A one-time cost of \$200 is estimated for potable water lead testing. <p>Indirect Costs: No indirect monetized costs were identified with this proposed change.</p> <p>Direct Benefits: The direct monetized benefits identified for each licensed child day center, includes an estimated net savings of:</p> <ul style="list-style-type: none"> • \$126.88 as a result of a reduction in staff time reviewing children’s records. • \$618.96 as a result of reduction in time with additional training counting towards required annual training. • \$10.71 reflecting reduced staffing requirements. • \$37,600 as a result of increased staff-to-children ratios. • \$14.10 as a result of reduced staff time with tracking children’s records. • \$78.88 as a result of reduced staff time associated with tracking staff records. • \$331.30 as a result of reduced staff time associated with tracking children’s health records. • \$8.50 as a result of removing the requirement for activated charcoal. • \$14.10 as a result of reduced staff time associated with maintaining documentation. <p>Indirect Benefits: No indirect monetized benefits were identified with this proposed change.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

	(a) \$2701.03 and a one-time cost of \$200.	(b) \$38,803.43
(3) Net Monetized Benefit	The regulatory flexibility in the proposed chapter provides for potential additional net revenue of \$35,902.40 for each licensed child day center.	
(4) Other Costs & Benefits (Non-Monetized)	Other non-monetized costs and benefits include the following cost savings in staff time with the reduced need for documentation for staff and children’s files. Additional cost savings with the removal of requirements which impose on flexibility in business practice. The reductions in materials and requirements vary depending on the program structure cannot be quantified.	
(5) Information Sources	<ul style="list-style-type: none"> • Epinephrine cost estimate: Epinephrine Budget Planning • Staff training on epinephrine administration: MAT Program 2023 • Restroom supplies: Amazon as of 6/4/24 (\$1.72 difference in cost for 3 bathrooms each month; 3 wastebaskets purchased and replaced every 10 years (=\$.80 per year) • Laundering washable toys: Amazon as of 6/4/24 (\$25 for 120 loads, 2.3 times per year). • Purchase of rest mats: Discount School Supply (\$40 per mat every 5 years (=\$9/mat annually) for preschool through toddler classrooms) • Diapering supplies: Amazon as of 6/4/24 (\$1.72 difference in cost for 2 diapering areas each month) • Cost of activated charcoal: Amazon as of 6/4/24 (\$17/bottle every 2 years (=\$8.5 annually) <p>*General cost estimates are based on a set of cost drivers, standard-specific assumptions, and variables that could impact costs aligned with the VDOE’s federally approved method of cost modeling for quality child care that is used to set rates for the Child Care Subsidy Program.</p>	

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct monetized costs were identified under the status quo.</p> <p>Indirect Costs: No indirect monetized costs were identified under the status quo.</p> <p>Direct Benefits: No direct monetized benefits were identified under the status quo.</p> <p>Indirect Benefits: No indirect monetized benefits were identified under the status quo.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A

(3) Net Monetized Benefit	N/A
(4) Other Costs & Benefits (Non-Monetized)	No non-monetized costs and benefits under the status quo
(5) Information Sources	N/A

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: No direct monetized costs were identified under alternative approaches.</p> <p>Indirect Costs: No indirect monetized costs were identified under alternative approaches.</p> <p>Direct Benefits: No direct monetized benefits were identified under alternative approaches.</p> <p>Indirect Benefits: No indirect monetized benefits were identified under alternative approaches.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Net Monetized Benefit	N/A	
(4) Other Costs & Benefits (Non-Monetized)	There are no alternatives to regulatory action, as the Standards for Licensed Child Day Centers, are necessary for program implementation.	
(5) Information Sources	N/A	

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: No direct monetized costs on local partners were identified. Indirect Costs: No direct monetized costs on local partners were identified. Direct Benefits: No direct monetized benefits on local partners were identified. Indirect Benefits: No indirect monetized benefits on local partners were identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	N/A	
(4) Assistance	N/A	
(5) Information Sources	N/A	

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)	Direct Costs: No direct monetized costs on families were identified. Indirect Costs: No indirect monetized costs on families were identified. Direct Benefits: No direct monetized benefits on families were identified. Indirect Benefits: No indirect monetized benefits on families were identified.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A

(3) Other Costs & Benefits (Non-Monetized)	<ul style="list-style-type: none"> • Increased protections for child health and safety in licensed child day centers. • Increase in parent engagement to include added requirements for communication and notification, • Reduced burden for families pertaining to documentation needed for enrollment. Cost savings for families due to physical exams allowed to be completed up to 12 months prior to the first date of attendance. Medications allowed to be kept at the center longer after parent is notified that authorization has expired.
(4) Information Sources	N/A

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>Direct Costs:</p> <p>The direct monetized costs on small businesses for each licensed child day center, and includes the following estimated net cost:</p> <ul style="list-style-type: none"> • \$1657.89 for staff time to complete training and materials costs to stock epinephrine. • \$331.30 for staff time on administrative duties associated with reviewing children’s records. • \$52.15 for staff time to complete program-based orientation. • \$52.59 for staff time to complete VDOE prelicensure orientation. • \$64.32 in materials costs for restroom supplies. • \$87.50 in staff time and materials to launder classroom items. • \$414.00 for the purchase of rest mats. • \$41.28 in materials for diapering supplies. • A one-time cost of \$200 is estimated for potable water lead testing. <p>Indirect Costs:</p> <p>No indirect monetized costs on small businesses were identified with this proposed change.</p> <p>Direct Benefits:</p> <p>The direct monetized benefits for small businesses were identified for each licensed child day center, and includes an estimated net savings of:</p> <ul style="list-style-type: none"> • \$126.88 as a result of a reduction in staff time reviewing children’s records. • \$618.96 as a result of reduction in time with additional training counting towards required annual training. • \$10.71 reflecting reduced staffing requirements.
--	--

	<ul style="list-style-type: none"> • \$37,600 as a result of increased staff-to-children ratios. • \$14.10 as a result of reduced staff time with tracking children’s records. • \$78.88 as a result of reduced staff time associated with tracking staff records. • \$331.30 as a result of reduced staff time associated with tracking children’s health records. • \$8.50 as a result of removing the requirement for activated charcoal. • \$14.10 as a result of reduced staff time associated with maintaining documentation. <p>Indirect Benefits: No indirect monetized benefits on small businesses were identified with this proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	The regulatory flexibility in the proposed chapter provides for potential additional net revenue of \$35,902.40 for each licensed child day center.	
(4) Alternatives	No less intrusive or less costly alternatives to achieve the purpose of the regulatory change were identified.	
(5) Information Sources	N/A	

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
8VAC20-780-10	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-780-20	(M/A):	3	0	3	-3
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-780-30	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-780-40	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	3	0	3	-3
	(D/R):	42	0	42	-42
8VAC20-780-50	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	5	0	5	-5
8VAC20-780-60	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	46	0	46	-46
8VAC20-780-70	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	24	0	24	-24
8VAC20-780-80	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	-1
	(D/R):	6	0	6	-6

8VAC20-780-90	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	-6
8VAC20-780-100	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	-6
8VAC20-780-110	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	2	-2
8VAC20-780-120	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	11	0	11	-11
8VAC20-780-130	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	2	0	2	-2
	(D/R):	8	0	8	-8
8VAC20-780-140	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	2	0	2	-2
	(D/R):	8	0	8	-8
8VAC20-780-150	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	4	-4
8VAC20-780-160	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	23	0	23	-23
8VAC20-780-170	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	2	-2
8VAC20-780-180	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	10	0	10	-10
	(M/A):	0	0	0	0

8VAC20-780-190	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	-6
8VAC20-780-200	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-210	(D/R):	5	0	5	-5
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-220	(D/R):	5	0	5	-5
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-230	(D/R):	1	0	1	-1
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-240	(D/R):	3	0	3	-3
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-245	(D/R):	50	0	50	-50
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	2	0	2	-2
8VAC20-780-250	(D/R):	7	0	7	-7
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-260	(D/R):	8	0	8	-8
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-270	(D/R):	22	0	22	-22
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-280	(M/A):	0	0	0	0
	(D/A):	0	0	0	0

	(M/R):	0	0	0	0
	(D/R):	18	0	18	-18
8VAC20-780-290	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	4	-4
8VAC20-780-300	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	4	-4
8VAC20-780-310	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	15	0	15	-15
8VAC20-780-320	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	26	0	26	-26
8VAC20-780-330	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	15	0	15	-15
8VAC20-780-340	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	29	0	29	-29
8VAC20-780-350	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	45	0	45	-45
8VAC20-780-355	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	14	0	14	-14
8VAC20-780-360	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	12	0	12	-12
8VAC20-780-370	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0

	(D/R):	25	0	25	-25
8VAC20-780-380	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	21	0	21	-21
8VAC20-780-390	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	10	0	10	-10
8VAC20-780-400	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	19	0	19	-19
8VAC20-780-410	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	8	0	8	-8
8VAC20-780-420	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	2	0	2	-2
	(D/R):	43	0	43	-43
8VAC20-780-430	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	48	0	48	-48
8VAC20-780-440	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	22	0	22	-22
8VAC20-780-450	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	12	0	12	-12
8VAC20-780-460	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	-6
8VAC20-780-470	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	27	0	27	-27

8VAC20-780-480	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	8	0	8	-8
8VAC20-780-490	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	10	0	10	-10
8VAC20-780-500	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	54	0	54	-54
8VAC20-780-510	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	46	0	46	-46
8VAC20-780-520	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	37	0	37	-37
8VAC20-780-530	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	9	0	9	-9
8VAC20-780-540	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	21	0	21	-21
8VAC20-780-550	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	185	0	185	-185
8VAC20-780-560	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	41	0	41	-41
8VAC20-780-570	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	27	0	27	-27
	(M/A):	0	0	0	0

8VAC20-780-580	(D/A):	0	0	0	0
	(M/R):	6	0	6	-6
	(D/R):	37	0	37	-37
8VAC20-780-590	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-600	(D/R):	10	0	10	-10
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-610	(D/R):	10	0	10	-10
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-FORMS	(D/R):	23	0	23	-23
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-780-DIBR	(D/R):	0	0	0	0
	(M/A):	0	0	0	0
	(D/A):	6	0	6	-6
	(M/R):	0	0	0	0
8VAC20-781-10	(D/R):	0	0	0	0
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-20	(D/R):	0	0	0	0
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-30	(D/R):	0	19	0	19
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	4	0	4
8VAC20-781-40	(D/R):	0	8	0	8
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
8VAC20-781-50	(D/R):	0	0	0	0
	(M/A):	0	0	0	0

	(M/R):	0	1	0	1
	(D/R):	0	31	0	31
8VAC20-781-60	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	15	0	15
8VAC20-781-70	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	2	0	2
	(D/R):	0	8	0	8
8VAC20-781-80	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	9	0	9
8VAC20-781-90	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	11	0	11
8VAC20-781-100	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	5	0	5
8VAC20-781-110	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	5	0	5
8VAC20-781-120	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-781-130	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	89	0	89
8VAC20-781-140	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	13	0	13
8VAC20-781-150	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0

	(D/R):	0	6	0	6
8VAC20-781-160	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-781-170	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	7	0	7
8VAC20-781-180	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	17	0	17
8VAC20-781-190	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	13	0	13
8VAC20-781-200	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	16	0	16
8VAC20-781-210	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	2	0	2
	(D/R):	0	37	0	37
8VAC20-781-220	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	12	0	12
8VAC20-781-230	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-781-240	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	22	0	22
8VAC20-781-250	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	40	0	40

8VAC20-781-260	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	23	0	23
8VAC20-781-270	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	27	0	27
8VAC20-781-280	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-781-290	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	12	0	12
8VAC20-781-300	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-781-310	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	19	0	19
8VAC20-781-320	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	23	0	23
8VAC20-781-330	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-781-340	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	24	0	24
8VAC20-781-350	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	15	0	15
	(M/A):	0	0	0	0

8VAC20-781-360	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	5	0	5
8VAC20-781-370	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-380	(D/R):	0	20	0	20
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-390	(D/R):	0	11	0	11
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
8VAC20-781-400	(D/R):	0	22	0	22
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-410	(D/R):	0	50	0	50
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-420	(D/R):	0	7	0	7
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-430	(D/R):	0	46	0	46
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-440	(D/R):	0	22	0	22
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-450	(D/R):	0	8	0	8
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
8VAC20-781-460	(D/R):	0	19	0	19
	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0

	(M/R):	0	0	0	0
	(D/R):	0	25	0	25
8VAC20-781-470	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	11	0	11
8VAC20-781-480	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	34	0	34
8VAC20-781-490	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	23	0	23
8VAC20-781-500	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	6	0	6
8VAC20-781-510	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	16	0	16
8VAC20-781-520	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	6	0	6
8VAC20-781-530	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	7	0	7
8VAC20-781-540	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-781-550	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	12	0	12
8VAC20-781-560	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0

	(D/R):	0	18	0	18
8VAC20-781-570	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	17	0	17
8VAC20-781-580	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	20	0	20
8VAC20-781-590	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	50	0	50
8VAC20-781-600	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	12	0	12
8VAC20-781-610	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	37	0	37
8VAC20-781-620	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	34	0	34
8VAC20-781-630	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	7	0	7
8VAC20-781-640	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	6	0	6
	(D/R):	0	30	0	30
8VAC20-781-650	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	18	0	18
8VAC20-781-660	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	24	0	24

8VAC20-781-670	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-781-680	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-781-690	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	7	0	7
8VAC20-781-700	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	3	0	3
8VAC20-781-710	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	10	0	10
8VAC20-781-720	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	12	0	12
8VAC20-781-730	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	2	0	2
8VAC20-781-740	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-781-750	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	10	0	10
				Grand Total of Changes in Requirements:	(M/A): -3 Ch780: -3 Ch781: 0 (D/A): -6 Ch780: -6 Ch781: +0

		(M/R): -5 Ch780: -23 Ch781: +18
		(D/R): -52 Ch780: -1291 Ch781: +1239

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
8VAC20-781-30	Stock epinephrine	NA	\$1657.89	\$1657.89
8VAC20-781-50	Review of children's records	NA	\$331.30	\$331.30
8VAC20-781-50	School-age children's records review	NA	-\$126.88	-\$126.88
8VAC20-781-130	Orientation training for staff	NA	\$52.15	\$52.15
8VAC20-781-130	Prelicensure orientation for directors	NA	\$52.59	\$52.59
8VAC20-781-140	Annual training	NA	-\$618.96	-\$618.96
8VAC20-781-240	Restroom supplies	NA	\$64.32	\$64.32
8VAC20-781-260	Staffing Requirements	NA	-\$10.71	-\$10.71
8VAC20-781-270	Increased staff-to-child ratio	NA	-\$37,600	-\$37,600
8VAC20-781-420	Washing soft toys used by children	NA	\$87.50	\$87.50

8VAC20-781-430	Rest mats with at least one inch of cushioning	NA	\$414.00	\$414.00
8VAC20-781-490	Diapering Supplies	NA	\$41.28	\$41.28
8VAC20-780-60	Information required for children's records (Removed)	NA	-\$14.10	-\$14.10
8VAC20-780-70	Information required for staff records (Removed)	NA	-\$78.88	-\$78.88
8VAC20-780-140	Physical exam for school-age children (Removed)	NA	-\$331.30	-\$331.30
8VAC20-780-540	First-aid supplies; activated charcoal	NA	-\$8.50	-\$8.50
8VAC20-780-550	Emergency drill documentation	NA	-\$14.10	-\$14.10

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
8VAC20-781-30	Added requirements for children of staff present at the facility to be considered enrolled.	This is an increase in regulatory burden as all regulatory requirements would apply to all children possibly resulting in an increase for staff.
8VAC20-781-80	Added flexibility for staff TB testing.	This is a reduction in regulatory burden as there is an increased timeframe in which tuberculosis screening documentation are valid, and additional relief has been added for new onboarding staff, as well as more flexibility has been added for when staff may be exposed to tuberculosis.
8VAC20-781-90	Added additional director qualifications.	This is a reduction in regulatory burden as there has been added

		flexibility to allow for more options to qualify as a director.
8VAC20-781-100	Added requirements for director designee.	This is an increase in regulatory burden as additional operations costs may apply if coverage cannot be fulfilled with one director and one designee.
8VAC20-781-110	Added additional lead teacher qualifications.	This is a decrease in regulatory burden as there has been additional flexibility added to allow for more options to qualify as a lead teacher.
8VAC20-781-120	Added new driver training requirements.	This is an increase in regulatory burden as most facilities utilize staff in multiple roles. Additional staffing may be needed if staff no longer qualify as a driver.
8VAC20-781-140	Increased flexibility for volunteer training.	This is a decrease in regulatory burden as the added flexibility allow volunteers to work up to 8 hours with no added requirements.
8VAC20-781-150	Added flexibility for CPR/FA training.	This is a decrease in regulatory burden as the added flexibility allows CPR and first aid certification to be obtained by any qualified individual or agency.
8VAC20-781-180	Added specific requirements for drivers.	This is an increase in regulatory burden as most facilities utilize staff in multiple roles. Additional staffing may be needed if staff no longer qualify as a driver.
8VAC20-781-200	Added lead testing requirements.	This is an increase in regulatory burden as facilities will now need to undergo testing and possible remediation.
8VAC20-781-250	Added requirements for playgrounds.	This is an increase in regulatory burden as the additional requirements for safe use of playground equipment is now dependent on whether or not the facility has equipment as well as the type and location of the equipment.
8VAC20-781-270	Added group size for school-age children.	This is an increase in regulatory burden as the added group size

		for school age children may require additional staff to maintain group size in larger programs.
8VAC20-781-280	Increased flexibility for ratio during rest time for balanced-mixed age groupings.	This is a decrease in regulatory burden as this section adds flexibility for ratios during rest time.
8VAC20-781-360	Adds requirement for a plan for a child with special needs.	This is an increase in regulatory burden as this section may require additional time or staff to work with families on developing a plan of care and inclusion.
8VAC20-781-450	Adds requirements for supervision during swimming and wading.	This is an increase in regulatory burden as the new requirements for safety during swimming and wading activities are applicable when facilities have these activities available.
8VAC20-781-490	Adds flexibility for diapering.	This is a decrease in regulatory burden as the added flexibility allows changing in areas other than a diapering table.
8VAC20-781-660	Adds flexibility for overnight care.	This is a decrease in regulatory burden as the added flexibility allows for sleeping areas by removing requirement for separate sleeping areas.
8VAC20-780-180	Removed general qualification requirements.	This is a decrease in regulatory burden as it reduces the burden of determining qualifications of staff and allows the determination of certain criteria to be made based on business practices.
8VAC20-780-190	Reduced programmatic experience requirement.	This is a decrease in regulatory burden as it reduces the required supervisory experience from 6 to 3 months to add greater flexibility in recruiting directors.
8VAC20-780-270	Removes requirement for water fountain or disposable cups.	This is a decrease in regulatory burden as it reduces the cost savings on facilities for new centers, and on disposable cups for existing and new centers.

8VAC20-780-310	Removed indoor space requirement for school-age camps.	This is a decrease in regulatory burden as it reduces the cost savings for outdoor camps and a reduction in the burden to secure a physical location.
8VAC20-780-320	Removed adult size toilet requirement for staff.	This is a decrease in regulatory burden as cost savings on facilities for new centers.
8VAC20-780-340	Removes unnecessary staff responsibilities.	This is a decrease in regulatory burden as it reduces staffing burden.
8VAC20-780-610	Removed requirement for a mattress to be provided for overnight care.	This is a decrease in regulatory burden as cost savings on materials for new centers, and for existing centers when mattresses need replacement.

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
N/A	N/A	N/A	N/A

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