



Office of the Secretary
Washington DC 20420

In Reply Refer To: 00REG

June 4, 2020

Subject: Economic Regulatory Impact Analysis for RIN 2900-AQ96(IF), Home Visits in Program of Comprehensive Assistance for Family Caregivers During COVID-19 National Emergency

I have reviewed this rulemaking package and determined the following:

1. This rulemaking will not have an annual effect on the economy of \$100 million or more, as set forth in Executive Order 12866.
2. This rulemaking will not have a significant economic impact on a substantial number of small entities under the Regulatory Flexibility Act, 5 U.S.C. 601-612.
3. This rulemaking is not likely to result in the expenditure of \$100 million or more by State, local, and tribal governments, in the aggregate, or by the private sector, in any one year, under the Unfunded Mandates Reform Act of 1995, 2 U.S.C. 1532.
4. Attached please find the relevant Regulatory Impact Analysis document, dated June 4, 2020.

Approved by:
Nicole Korkos
Chief Economist
Office of Regulation Policy & Management (00REG)
Office of the Secretary

Impact Analysis for RIN 2900-AQ96(IF)

Title of Rulemaking: Home Visits in Program of Comprehensive Assistance for Family Caregivers During COVID-19 National Emergency

Purpose: To determine the economic impact of this rulemaking.

Statement of Need: The Caregivers and Veterans Omnibus Health Services Act of 2010 (P.L 111-163) established 38 U.S.C. 1720G, which directed VA to establish a Program of Comprehensive Assistance for Family Caregivers (PCAFC) and a Program of General Caregiver Support Services. Both programs are managed by the VA's Caregiver Support Program Office. On March 13, 2020, a National Emergency was declared by the President in response to COVID-19.

COVID-19 is a new disease that causes respiratory illness in people and can spread from person to person. Many individuals and communities across the country have taken steps to reduce the spread of COVID-19, including isolating individuals diagnosed with the disease and implementing physical distancing measures. The priority goal in the VA response to COVID-19 is the protection of veterans, their caregivers, and VA clinical staff. This rulemaking is intended to reduce the risk of exposure to and transmission of COVID-19 to individuals involved in PCAFC, as well as members of their households and others with whom they come into contact who may be affected, by providing the facilities flexibility in the modalities used to conduct home visits other than in-person visits.

The intent of this rulemaking is to protect veterans, their families, and VA clinical staff by reducing the spread of COVID-19 for the duration of the COVID-19 National Emergency.

Summary: The Department of Veterans Affairs (VA) is revising its regulations that govern VA's Program of Comprehensive Assistance for Family Caregivers (PCAFC) to relax the requirement for in-person home visits during the National Emergency related to the 2019 Novel Coronavirus (COVID-19). This change is required to ensure the safety and well-being of veterans, caregivers, and VA clinical staff.

Benefits: The interim final rulemaking adds flexibility to the required in-home assessments. This section will allow VA clinical staff to conduct in-home assessments through other modalities while remaining compliant with current regulations and policies. Through this rulemaking, VA will minimize risk of exposure and spreading of COVID-19 to VA clinical staff, veterans, their caregivers, their families, and other household members during this National Emergency.

Estimated Impact: The estimated transfer savings of the revisions to 38 CFR Part 71 are \$106,136 in fiscal year (FY) 2020. The impacts of this rulemaking do not extend beyond FY 2020.

Alternative Policy Approaches: VA is relaxing the requirements of in-person home visits during the National Emergency related to COVID-19. VA considered leaving the requirement as is, however, it would have the potential to put veterans, their families, and VA staff at greater risk of contracting COVID-19.

Assumptions and Methodology: The estimated transfer savings of the revised section § 71.60 are \$106,136 in FY 2020.

VA currently offers modalities such as face-to-face appointments, video appointments and telephone appointments to fit the Veteran's needs and capabilities. VA staff work with Veterans to determine the best modality to use for each appointment. Therefore, all costs associated are included in the yearly facility budgets as well as the Office of Information and Technology (OI&T).

There are approximately 10,500 home assessments requiring completion for the remainder of FY 2020 according to data within the Caregiver Support Program Caregiver Record Management Application (CARMA) system. The remaining home assessments were divided between urban and rural using the ratio provided by VA Manpower staffing model. It showed that 117 VA facilities out of 135 VA facilities or 87% are in an urban setting and 18 facilities or 13% are in a rural setting. It is assumed that the distribution of home assessments is equal to the distribution of facilities, meaning 87% of total home assessments are assumed to be in an urban setting and 13% in a rural setting. All remaining home assessments will now be done in a virtual setting.

It is believed that approximately 4 hours are needed to conduct one home assessment in urban settings and 8 hours in rural settings. This number was then multiplied by total assessments to determine total hours needed and then divided by 2,087 (number of hours for one Full Time Equivalent (FTE)) to find the number of GSA vehicles needed per one FTE. Total costs were found by utilizing the U.S. General Services Administration (GSA) rates for vehicle leases. Table 1 shows the transfer savings in urban settings and table 2 shows the transfer savings in rural settings as a result of these assessments being done through alternate modalities.

Table 1. FY20 Transfer Savings from Interim Final Rulemaking in Urban Settings

Fiscal Year	Total Home Assessments Now Virtual	Home Assessments in Urban Setting	Total Urban Estimated Hours for Home Assessments	Total GSA Vehicles for Urban Home Assessments	GSA Monthly Rate	Mileage Rate	Avg. Roundtrip Mileage for Urban Visits	Total Urban Mileage Costs	Total Urban Vehicle Rental Costs
2020	10,502	9,137	36,547	18	256.75	0.129	61	71,897	73,694

Table 2. FY20 Transfer Savings from Interim Final Rulemaking in Rural Settings

Fiscal Year	Total Home Assessments Now Virtual	Home Assessments in Rural Setting	Total Rural Estimated Hours for Home Assessments	Total GSA Vehicles for Rural Home Assessments	GSA Monthly Rate	Mileage Rate	Avg. Roundtrip Mileage for Rural Visits	Total Rural Mileage Costs	Total Rural Vehicle Rental Costs
2020	10,502	1,365	10,922	5	256.75	0.129	174	30,645	32,442

In this analysis, VA assumes that the impact of this regulation does not extend beyond FY 2020.

Submitted by:

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Date:

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