



## **Economic Impact Analysis Virginia Department of Planning and Budget**

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### **8 VAC 20-541– Regulations Governing Approved Programs for Virginia Institutions of Higher Education** **Department of Education** April 24, 2000

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The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 9-6.14:7.1.G of the Administrative Process Act and Executive Order Number 25 (98). Section 9-6.14:7.1.G requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

### **Summary of the Proposed Regulation**

The Board of Education (board) proposes to repeal the current Regulations Governing Approved Programs for Virginia Institutions of Higher Education (8 VAC 20-540) and promulgate new regulations by the same title (8 VAC 20-541). Proposed changes that will affect citizens of the Commonwealth include a requirement that institutions with approved professional education programs ensure that at least 70 percent of their program participants pass the Praxis II exam; more flexibility for institutions to set their own standards governing faculty teaching loads; additional requirements for the gathering and reporting of data; and an increase in the maximum number of semester hours of professional studies that an institution may require for an approved program.

## Estimated Economic Impact

The board proposes that an institution's professional education department be required to ensure that "at least 70% of candidates as documented in the institution's declaration of admission to the teacher program shall annually pass Praxis II (subject area assessments)..." in order to maintain continued approved program status. The Department of Education (department) has not yet concretely determined which students are included in the pool from which 70% must pass Praxis II in order for a professional education department to maintain continued board approved program status. If all students that are admitted into the teacher program are included in the pool, then the 70% minimum could effectively threaten the approved program status of some of the 37 approved programs in the Commonwealth. Institutions would be pressured to improve the preparation of their students taking the Praxis II exams. The Praxis II exams are designed to test knowledge of content in specific subject areas such as math or English. If the threat of loss of approved program status were effective in spurring institutions to take actions that improve the preparation of their students taking the Praxis II exams, then this proposed change could potentially result in future teachers with greater content knowledge.

The department has indicated, though, that students that drop out of the program will probably not be counted in the pool; and that if students fail the Praxis II one or more times, but eventually pass, their failed exam results will most likely not count toward the required 70% pass rate for the program. If this method is used to determinate whether the 70% requirement is met, then institutions will be more likely to meet the proposed requirement without improving the test results of their students. It is recommended that the method by which the details of how the percentage of candidates passing the exam is calculated be clarified.

The proposed new regulation would provide more flexibility to institutions to set their own standards governing faculty-teaching loads. The current regulation specifies maximum semester teaching loads for graduate and undergraduate faculty. The increased flexibility may allow institutions to save on costs.

The proposed regulation would increase the amount and type of data gathered and reported by approved programs. According to the department, the data will be used to satisfy federal requirements; to respond to requests for information from the Offices of the Governor

and Secretary of Education, the Virginia General Assembly, and national and state agencies; to address teacher supply and demand issues; to gauge trends such as the enrollment in programs of non-traditional students or adults changing careers; and to respond to teacher recruitment and retention issues. The department does not have an estimate of the additional resources and labor hours required by institutions to comply with this new data request. Since there is no estimate of the cost of this proposed increase in data reporting, no conclusion can be drawn about whether the costs are more or less than the benefits of these proposed new requirements.

Under the current regulation, institutions may require no more than 18 semester hours of professional studies as part of an approved program. The board proposes to increase the maximum required semester hours of professional studies to 24. This limit was originally implemented in 1993, to ensure that students took an adequate number of classes in the specialty area in which they will teach. The department believes this increase may be necessary to cover the standards of learning and technology in education -- areas that were both recently added to the Licensure Regulation for School Personnel.

This proposed change appears to conflict with the policy direction implied by the board's proposed "career switcher" alternative licensure program. The department's discussion of this proposed change suggests that requiring additional professional studies is an appropriate strategy for increasing student outcomes. By contrast, a premise of the "career switcher" program is that extensive professional studies beyond a certain core minimum is not necessary for successful teacher performance. While the proposed increase in the maximum number of semester hours of professional studies that may be required is not prescriptive -- it merely raises a cap -- it suggests a different policy direction from that represented in the "career switcher" program, and may lead to an increase in the professional study requirements in many approved teacher education programs. The additional professional education would likely be offset by decreased academic coursework in other areas, including coursework in or related to a student's major.

There is not a clear consensus in the literature on the value of professional studies. The 1996 National Commission on Teaching and America's Future report, "What Matters Most: Teaching for America's Future," emphasizes the importance of pedagogy training. However, research exists that indicates that students with teachers who have not had the hours of

professional studies experience associated with a traditional approved education program perform no worse than students who have traditionally certified teachers. For example, in a careful study that uses the *National Educational Longitudinal Study of 1988* (NELS) data set, Goldhaber and Brewer (2000) find that math and science students who have teachers with emergency credentials, who presumably would have less hours of professional studies, do no worse than students whose teachers have standard teaching credentials.

## **Businesses and Entities Affected**

The proposed regulation affects the 37 institutions of higher education that have programs for the preparation of teachers as well as students and potential students in those programs.

## **Localities Particularly Affected**

The proposed regulation affects localities throughout the Commonwealth.

## **Projected Impact on Employment**

The proposed increase in required data gathering and reporting may require institutions to employ some additional labor.

## **Effects on the Use and Value of Private Property**

The institutions of higher education that intend to maintain approved education programs will likely incur increased costs in complying with additional data gathering and reporting, but may be able to save on costs associated with more flexibility on teaching loads.

**References:**

Goldhaber, Dan D. and Dominic J. Brewer (2000), "Does Teacher Certification Matter? High School Teacher Certification Status and Student Achievement," forthcoming in *Educational Evaluation and Policy Analysis*.

National Commission on Teaching and America's Future (1996), *What Matters Most: Teaching for America's Future*. New York: Author.