

Office of Regulatory Management
Economic Review Form

Agency name	State Board of Education
Virginia Administrative Code (VAC) Chapter citation(s)	8 VAC 20-23
VAC Chapter title(s)	Licensure Regulations for School Personnel
Action title	Amendments to the Licensure Regulations for School Personnel to reflect changes with ASL national certifications
Date this document prepared	December 14, 2023
Regulatory Stage (including Issuance of Guidance Documents)	Fast-Track Regulatory Action

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: There are no direct costs due to this proposed change. Indirect Costs: Describe the indirect costs of the proposed change. There are no indirect costs due to this proposed change. Direct Benefits: Describe the direct benefits of this proposed change here. The proposed amendment strikes the language of the older certifications and reflects the historical changes in the organizations and certifications, while keeping to the same high-standard of certifications required for the ASL endorsement. Indirect Benefits: The Board of Education (“Board”) is making changes to the requirements for an endorsement in foreign language preK-12 in ASL in order to align the requirements with industry-standard national certifications in ASL. The proposed amendment strikes these older certifications and reflects the acceptance of all certifications issued by ASLTA. The change will make the regulatory requirements more durable while also keeping with the high-standard certifications issued by ASLTA. In 2003, Registry of Interpreters for the Deaf (“RID”) began to recognize interpreters who hold National Association of the Deaf (“NAD”) certifications, which included the Level IV certifications prescribed in the Licensure Regulations. While these credentials were offered by NAD between the early 1990s and late 2002, the NAD no longer issues certifications. In order to continue to maintain their certification, NAD credentialed interpreters must have had an active certification and have registered with RID prior to June 30, 2005. These interpreters are required to comply with all aspects of RID’s Certification Maintenance Program, including the completion of professional development. In addition, RID fully recognizes the National Interpreter Certification (“NIC”), Certificate of Interpretation (“CI”), Reverse Skills Certification (“RSC”), and the Comprehensive Skills Certificate (“CSC”); these certifications have been discontinued and no longer have exams available. The proposed amendment strikes the language of the older certifications and reflects the historical changes in the organizations and certifications, while keeping to the same high-standard of certifications required for the ASL endorsement.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) \$0</p>	<p>(b) \$0</p>

(3) Net Monetized Benefit	\$0
(4) Other Costs & Benefits (Non-Monetized)	The benefit of amending these regulations is to keep the regulations current, clear and accurate.
(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: Indirect Costs: There are no additional monetizable direct or indirect costs associated with maintaining the status quo. Direct Benefits: Indirect Benefits: There are no additional monetizable direct or indirect benefits associated with maintaining the status quo.	
(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)	There are no additional costs or benefits associated with maintaining the status quo.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	Direct Costs: Indirect Costs: There are no alternative approaches that would result in either direct or indirect costs. Direct Benefits: Indirect Benefits: There are no alternative approaches that would result in either direct or indirect benefits.
--	---

(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)	No other viable alternatives to amending this regulatory chapter were identified.	
(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)	Direct Costs: Indirect Costs: There are no identifiable impacts on local partners that would result in either direct or indirect costs. Direct Benefits: Indirect Benefits: There are no identifiable impacts on local partners that would result in either direct or indirect benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	\$0	
(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)	Direct Costs: Indirect Costs: There are no identifiable impacts on families that would result in either direct or indirect costs. Direct Benefits: Indirect Benefits: There are no identifiable impacts on families that would result in either direct or indirect benefits.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	No other impacts on families due to amending this regulatory chapter were identified.	
(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)	Direct Costs: Indirect Costs: There are no identifiable impacts on small businesses that would result in either direct or indirect costs. Direct Benefits: Indirect Benefits: There are no identifiable impacts on small businesses that would result in either direct or indirect benefits.	
--	---	--

(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	No other impacts on small businesses due to amending this regulatory chapter were identified.	
(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	
8VAC20-23-360	Statutory:	0	0	0	0	
	Discretionary:	6	0	0	0	
					Total Net Change of Statutory Requirements:	0
					Total Net Change of Discretionary Requirements:	0

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
8VAC20-23-360	Licensing e requirements for an endorsement in foreign language preK-12 in ASL			There is no anticipated cost on individuals, business, or other entities resulting from the regulatory change.

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
8VAC20-23-360	The regulatory action’s primary advantage to the public, agency, and the Commonwealth is that it will provide accurate requirements for the endorsement in preK-12 foreign language in ASL. The regulatory revisions are	The revision to this regulatory section has resulted in a consolidation of the documents needed to demonstrate competency in subdivision 2 a of subsection D to either (i) a current, valid certification issued by the ASLTA or (ii) a

	necessary to ensure the proper qualifications of individuals teaching ASL in public school.	current, valid certification issued by RID.
--	---	---

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

Title of Guidance Document	Original Length	New Length	Net Change in Length

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