

Office of Regulatory Management
Economic Review Form

Agency name	State Board of Education
Virginia Administrative Code (VAC) Chapter citation(s)	8 VAC20-132 [new chapter]; 8 VAC20-131
VAC Chapter title(s)	Virginia Standards of Accreditation (8VAC20-132); Regulations Establishing Standards for Accrediting Public Schools in Virginia (8VAC20-131)
Action title	Revisions to the Virginia Standards of Accreditation
Date this document prepared	March 28, 2024
Regulatory Stage (including Issuance of Guidance Documents)	Standard proposed stage.

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: No direct economic costs are anticipated from the regulatory change.</p> <p>Indirect Costs: No indirect economic costs are anticipated from the regulatory change.</p> <p>Direct Benefits: No direct economic benefits are anticipated from the regulatory change.</p> <p>Indirect Benefits: No indirect economic benefits are anticipated from the regulatory change.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>
	<p>(a) N/A</p>	<p>(b) N/A</p>
<p>(3) Net Monetized Benefit</p>	<p>N/A</p>	
<p>(4) Other Costs & Benefits (Non-Monetized)</p>	<p>The proposed regulatory change is expected to have a minimal fiscal impact, with costs or losses likely to be easily covered by the existing resources and operating budget of VDOE and the 131 local school divisions. In terms of indirect costs associated with this change, they are not clearly defined but are presumed to be insignificant and manageable within the current fiscal framework. The financial implications, encompassing costs, savings, fees, or revenues, are projected to be negligible, thereby suggesting that the existing financial structure can accommodate these changes without additional strain. Economically, the regulatory change is not expected to yield immediate direct benefits. Similarly, immediate indirect economic advantages are not foreseen at this time. The primary motivation behind the regulatory adjustments is non-economic in nature. The effective date for these changes is anticipated for the 2025-2026 school year, but these changes suggest there will be added focus on efficiency and streamlining in the long term. The modified system is anticipated to be more straightforward and less complex, which should reduce the time and resources required for future operations and compliance for both VDOE and the 131 local school divisions. From a benefits perspective, although immediate economic gains are not expected, the streamlined and less complicated system should lead to longer-term efficiencies. It is predicted that there will be a learning curve associated with the new system for both VDOE and the local school divisions, but once acclimated, both VDOE and the local school divisions should find these new requirements to be less burdensome to manage. This adaptation aligns with both federal and</p>	

	state legal requirements and is expected to facilitate smoother operations going forward. As for the impact on the Commonwealth of Virginia, VDOE, as well as the 131 local school divisions, a ripple effect of the regulatory change is predicted that will likely lead to a more uniform and straightforward operational approach. In particular, the local school divisions should experience less administrative overhead and potentially more predictable regulatory compliance, which will indirectly support an increased focus on educational outcomes and less on navigating complex regulatory frameworks.
(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: No direct monetized costs are identified under the status quo. Indirect Costs: No indirect monetized costs are identified under the status quo. Direct Benefits: No direct monetized benefits are identified under the status quo. Indirect Benefits: No indirect monetized benefits are identified under the status quo.	
(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)	The Status Quo merges elements which are typically distinct in other states, namely accreditation and accountability. This causes VDOE and the 131 local school divisions to incur various non-monetized costs. The Status Quo stands as one of the nation's most intricate systems and attempts to serve dual functions that are both crucial yet inherently different. This resulting complexity not only demands substantial efforts to maintain but also poses challenges in effectively fulfilling the separate objectives of accreditation and accountability. The inherent intricacies of this system have been found to lead to inefficiencies, as the attempt to blend these two functions can dilute the effectiveness of each. This potentially hinders the system's ability to meet its intended goals in a straightforward and impactful manner.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	The Board is required by statute to have standards for the accreditation of public schools, and the current blended system of accountability and accreditation cannot be amended outside of the regulatory process. Currently, there is no clear alternative to either leaving the current blended regulatory system as is or making these proposed changes.	
(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)	N/A	
(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)	<p>Direct Costs: There are no direct monetized costs of this proposed change on local partners.</p> <p>Indirect Costs: There are no indirect monetized costs of this proposed change on local partners.</p> <p>Direct Benefits: There are no direct monetized benefits of this proposed change on local partners.</p> <p>Indirect Benefits: There are no indirect monetized benefits of this proposed change on local partners.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A

(3) Other Costs & Benefits (Non-Monetized)	While it is believed that any revenue costs or losses can be absorbed within the existing resources of VDOE and within the operating costs of the 131 local school divisions, all local school divisions will realize the same costs and benefits. See Table 1a for a more detailed description.
(4) Assistance	VDOE will provide training on the new accountability and accreditation system. The communications and training schedule and scope of work is to be determined. Schools that are identified for support through the new accountability system will be provided federal funds as a result but at this time there is no plan to provide other funds.
(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>Direct Costs: There are no direct monetized costs of this proposed change on families.</p> <p>Indirect Costs: There are no indirect monetized costs of this proposed change on families.</p> <p>Direct Benefits: There are no direct monetized benefits of this proposed change on families.</p> <p>Indirect Benefits: There are no indirect monetized benefits of this proposed change on families.</p>	
(2) Present Monetized Values	Direct & Indirect Costs (a) N/A	Direct & Indirect Benefits (b) N/A
(3) Other Costs & Benefits (Non-Monetized)	These new regulations will develop a more transparent system that will benefit families by providing more accurate data regarding the performance of students and schools.	
(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>Direct Costs: There are no direct monetized costs of this proposed change on small business.</p> <p>Indirect Costs: There are no indirect monetized costs of this proposed change on small business.</p> <p>Direct Benefits: There are no direct monetized benefits of this proposed change on small business.</p> <p>Indirect Benefits: There are no indirect monetized benefits of this proposed change on small business.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) N/A	(b) N/A
(3) Other Costs & Benefits (Non-Monetized)	<p>These new regulations will develop a more transparent system that may benefit the business community by providing more accurate data regarding the performance of students and schools.</p>	
(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	Total Net Change in Requirements
8VAC20-131-5 Definitions [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-132-10 Definitions [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-131-10 Purpose [Repealed]	(M/A):	2	0	2	0
	(D/A):	1	0	1	0
	(M/R):	0	0	0	0
	(D/R):	5	0	5	0
8VAC20-132-20 Purpose [New]	(M/A):	0	3	0	3
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-131-20 Philosophy, goals, and objectives [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	9	0	9	0
8VAC20-132-30 Philosophy, goals, and objectives [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	4	0	4
	(D/R):	0	8	0	8
8VAC20-131-30 Student	(M/A):	7	0	7	0
	(D/A):	10	0	10	0

achievement expectations [Repealed]	(M/R):	0	0	0	0
	(D/R):	2	0	2	0
<i>8VAC20-132-40</i> <i>Student achievement expectations</i> <i>[New]</i>	(M/A):	0	6	0	6
	(D/A):	0	7	0	7
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-131-50 Requirements for graduation (effective for the students entering ninth grade prior to the 2018-2019 school year) [Repealed]	(M/A):	8	0	8	0
	(D/A):	13	0	13	0
	(M/R):	1	0	1	0
	(D/R):	4	0	4	0
<i>8VAC20-132-50</i> <i>Requirements for graduation (effective for the students entering ninth grade prior to the 2018-2019 school year)</i> <i>[New]</i>	(M/A):	0	8	0	8
	(D/A):	0	13	0	13
	(M/R):	0	1	0	1
	(D/R):	0	4	0	4
8VAC20-131-51 Requirements for graduation (effective with the students who enter the ninth grade in the 2018–2019 school year) [Repealed]	(M/A):	12	0	12	0
	(D/A):	6	0	6	0
	(M/R):	0	0	0	0
	(D/R):	42	0	42	0
<i>8VAC20-132-51</i> <i>Requirements for graduation (effective with</i>	(M/A):	0	12	0	12
	(D/A):	0	6	0	6
	(M/R):	0	0	0	0

<i>the students who enter the ninth grade in the 2018–2019 school year</i> [New]	(D/R):	0	42	0	42
8VAC20-131-60 Transfer students [Repealed]	(M/A):	0	0	0	0
	(D/A):	5	0	5	0
	(M/R):	0	0	0	0
	(D/R):	18	0	18	0
8VAC20-132-60 Transfer students [New]	(M/A):	0	0	0	0
	(D/A):	0	5	0	5
	(M/R):	0	0	0	0
	(D/R):	0	18	0	18
8VAC20-131-70 Program of instruction and learning objectives [Repealed]	(M/A):	0	0	0	0
	(D/A):	2	0	2	0
	(M/R):	0	0	0	0
	(D/R):	8	0	8	0
8VAC20-132-70 Program of instruction and learning objectives [New]	(M/A):	0	0	0	0
	(D/A):	0	2	0	2
	(M/R):	0	4	0	4
	(D/R):	0	4	0	4
8VAC20-131-80 Instructional program in elementary schools [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	18	0	18	0
	(D/R):	7	0	7	0
8VAC20-132-80 Instructional program in elementary schools [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	18	0	18
	(D/R):	0	7	0	7
8VAC20-131-90 Instructional program in middle schools [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	0
	(D/R):	14	0	14	0

8VAC20-132-90 Instructional program in middle schools [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	14	0	14
8VAC20-131-100 Instructional program in secondary schools [Repealed]	(M/A):	0	0	0	0
	(D/A):	1	0	1	0
	(M/R):	2	0	2	0
	(D/R):	12	0	12	0
8VAC20-132-100 Instructional program in secondary schools [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	8	0	8
8VAC20-131-110 Standard and verified units of credit [Repealed]	(M/A):	0	0	0	0
	(D/A):	3	0	3	0
	(M/R):	1	0	1	0
	(D/R):	8	0	8	0
8VAC20-132-110 Standard and verified units of credit [New]	(M/A):	0	0	0	0
	(D/A):	0	3	0	3
	(M/R):	0	1	0	1
	(D/R):	0	8	0	8
8VAC20-131-120 Summer school [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	5	0	5	0
8VAC20-132-120 Summer school [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	5	0	5
8VAC20-131-130 Elective courses [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	2	0	2	0

8VAC20-132-130 Elective courses [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	2	0	2
8VAC20-131-140 College and career readiness; career exposure, exploration, and planning; and opportunities for postsecondary credit [Repealed]	(M/A):	0	0	0	0
	(D/A):	3	0	3	0
	(M/R):	2	0	2	0
	(D/R):	7	0	7	0
8VAC20-132-140 College and career readiness; career exposure, exploration, and planning; and opportunities for postsecondary credit [New]	(M/A):	0	0	0	0
	(D/A):	0	3	0	3
	(M/R):	0	2	0	2
	(D/R):	0	7	0	7
8VAC20-131-150 Standard school year and school day [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	4	0
8VAC20-132-150 Standard school year and school day [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-131-170 Family Life Education [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	0
	(D/R):	3	0	3	0

8VAC20-132-160 Family Life Education [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	3	0	3
8VAC20-131-180 Off-site instruction [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	8	0	8	0
8VAC20-131-170 Off-site instruction [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-131-190 Library media, materials, and equipment [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	4	0	4	0
8VAC20-132-180 Library media, materials, and equipment [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	4	0	4
8VAC20-131-200 Extracurricular and other school activities; recess [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	0
	(D/R):	5	0	5	0
8VAC20-132-190 Extracurricular and other school activities; recess [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	5	0	5
8VAC20-131-210 Role of the principal [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	0

	(D/R):	13	0	13	0
8VAC20-132-200 Role of the principal [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	1	0	1
	(D/R):	0	13	0	13
8VAC20-131-220 Role of professional teaching staff [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	6	0	6	0
8VAC20-132-210 Role of professional teaching staff [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	6	0	6
8VAC20-131-230 Role of support staff [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	3	0	3	0
8VAC20-132-220 Role of support staff [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	3	0	3
8VAC20-131-240 Administrative and support staff; staffing requirements [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	4	0	4	0
	(D/R):	8	0	8	0
8VAC20-132-230 Administrative and support staff; staffing requirements [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	4	0	4
	(D/R):	0	8	0	8
8VAC20-131-260 School	(M/A):	0	0	0	0
	(D/A):	0	0	0	0

facilities and safety [Repealed]	(M/R):	9	0	9	0
	(D/R):	9	0	9	0
8VAC20-132-240 School facilities and safety [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	9	0	9
	(D/R):	0	9	0	9
8VAC20-131-270 School and community communications [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	3	0	3	0
8VAC20-132-250 School and community communications [New]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	11	0	11
	(D/R):	0	11	0	11
8VAC20-131-370 Expectations for school accountability and accreditation [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	1	0	1	0
	(D/R):	2	0	2	0
8VAC20-132-270 Measurement of school quality for accountability. [New]	(M/A):	0	3	0	3
	(D/A):	0	2	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-131-380 Measurement of school quality for accreditation [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	7	0	7	0
8VAC20-131-280 Identification of schools for improvement	(M/A):	0	27	0	27
	(D/A):	0	3	0	6
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0

<i>and required actions. [New]</i>					
8VAC20-131-390 Accreditation [Repealed]	(M/A):	0	0	0	0
	(D/A):	8	0	8	0
	(M/R):	0	0	0	0
	(D/R):	13	0	13	0
8VAC20-132-300 Accreditation [New]	(M/A):	0	22	0	22
	(D/A):	0	13	0	17
	(M/R):	0	3	0	3
	(D/R):	0	4	0	4
8VAC20-131-400 Application of the school quality indicator performance levels to actions [Repealed]	(M/A):	0	0	0	0
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	18	0	18	0
8VAC20-132-280 Identification of schools for improvement and required actions. [New]	(M/A):	0	43	0	43
	(D/A):	0	3	0	6
	(M/R):	0	0	0	0
	(D/R):	0	6	0	6
8VAC20-131-410 Recognitions and rewards for school and division accountability [Repealed]	(M/A):	0	0	0	0
	(D/A):	1	0	1	0
	(M/R):	0	0	0	0
	(D/R):	5	0	5	0
8VAC20-132-290 Recognitions and rewards for school and division accountability [New]	(M/A):	0	7	0	7
	(D/A):	0	0	0	0
	(M/R):	0	0	0	0
	(D/R):	0	0	0	0
8VAC20-131-420 Waivers	(M/A):	0	0	0	0
	(D/A):	2	0	2	0

and alternative accreditation plans [Repealed]	(M/R):	1	0	1	0
	(D/R):	3	0	3	0
8VAC20-132-310 Waivers and alternative accreditation plans [New]	(M/A):	0	6	0	6
	(D/A):	0	3	0	7
	(M/R):	0	0	0	0
	(D/R):	0	8	0	8
8VAC20-131-430 Effective dates [Repealed]	(M/A):	0	0	0	0
	(D/A):	1	0	1	0
	(M/R):	0	0	0	0
	(D/R):	8	0	8	0
8VAC20-132-320 Effective dates [New]	(M/A):	0	0	0	0
	(D/A):	0	1	0	1
	(M/R):	0	0	0	0
	(D/R):	0	7	0	7
				Grand Total of Changes in Requirements:	(M/A): 108 (D/A): 5 (M/R): 19 (D/R): (38)

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

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
N/A	N/A	N/A

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).