



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

8 VAC 20-543 Regulations Governing the Review and Approval of Education Programs in Virginia

Department of Education

Town Hall Action/Stage: 7006 / 11169 Fast-Track

July 20, 2026

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with § 2.2-4007.04 of the Code of Virginia (Code) and Executive Order 17 (2026). The analysis presented below represents DPB’s best estimate of the potential economic impacts as of the date of this analysis.¹

Summary of the Proposed Amendments to Regulation

Pursuant to Chapter 186 of the 2025 *Acts of Assembly*, the Board of Education (Board) proposes to amend this regulation to remove a duplicative accreditation requirement for school counselor and school psychologist programs.

Background

Currently, section 20 of this regulation requires professional education programs to have Council for the Accreditation of Educator Preparation (CAEP) accreditation.² In addition, school counselor and school psychologist programs obtain accreditation from other bodies, such as the Council for Accreditation of Counseling and Related Education Programs (CACREP) or the National Association of School Psychologists (NASP).

Chapter 186 directed the Board to provide an alternative means of accreditation for school counselor and school psychologist programs that have obtained “specialty area accreditation from a specialized accrediting agency recognized by the U.S. Secretary of

¹ See Code § 2.2-4007.04 (A).

² Most, but not all, school counselor and school psychologist programs are housed within schools or departments of education. As of the date of this report, it was not yet clear whether these programs are required to have CAEP accreditation when they are housed elsewhere, such as a psychology department.

Education or the Council for Higher Education Accreditation.” According to house committee testimony about the bill that became Chapter 186, these specialized agencies include CACREP and NASP.³ In response, the Board proposes to thus amend *Regulations Governing the Review and Approval of Education Programs in Virginia* (8 VAC 20-543).

Estimated Benefits and Costs

According to testimony by the Virginia Association of Colleges and Teacher Educators, staff at Virginia colleges and universities with school counselor and school psychologist programs must currently submit multiple reports to different accrediting bodies and host duplicative site visits. Eliminating the CAEP requirement for school counselor and school psychologist programs would be beneficial for higher education institutions with such programs in that substantial staff time would be saved on duplicative work, while still requiring that accreditation standards from a specialized accrediting agency recognized by the U.S. Secretary of Education or the Council for Higher Education Accreditation are met. These changes would not otherwise affect professional education programs, because their impact is limited only to school counselor and school psychologist programs.

Businesses and Other Entities Affected

The proposed amendment particularly affects the 14 school counselor programs and 6 school psychologist programs at Virginia colleges and universities.⁴

The Code requires DPB to assess whether an adverse impact may result from the proposed regulation.⁵ An adverse impact is indicated if there is any increase in net cost or reduction in net benefit for any entity, even if the benefits exceed the costs for all entities combined.⁶ The proposed amendment neither increases net costs nor reduces net benefit for any Virginia entity.⁷ Additionally, the impact of the proposed amendment is entirely due to the legislation. Thus, no adverse impact is indicated.

³ See <https://sg001-harmony.sliq.net/00304/Harmony/en/PowerBrowser/PowerBrowserV3/20250114/-1/20485>.

⁴ Data source: State Council of Higher Education for Virginia.

⁵ See Code § 2.2-4007.04 (D).

⁶ Statute does not define “adverse impact,” state whether only Virginia entities should be considered, nor indicate whether an adverse impact results from regulatory requirements mandated by legislation. As a result, DPB has adopted a definition of adverse impact that assesses changes in net costs and benefits for each affected Virginia entity that directly results from discretionary changes to the regulation.

⁷ CAEP is based in Minnesota.

Small Businesses⁸ Affected:⁹

The proposed amendment does not adversely affect small businesses.

Localities¹⁰ Affected¹¹

The proposed amendment does not appear to disproportionately affect particular localities or affect costs for local governments.

Projected Impact on Employment

The proposed amendment does not appear to substantively affect total employment.

Effects on the Use and Value of Private Property

The proposed amendment would reduce costs for private colleges and universities with school counselor and/or school psychologist programs. The proposed amendment does not affect real estate development costs.

⁸ Pursuant to § 2.2-4007.04 of the Code of Virginia, small business is defined as “a business entity, including its affiliates, that (i) is independently owned and operated and (ii) employs fewer than 500 full-time employees or has gross annual sales of less than \$6 million.”

⁹ See Code § 2.2-4007.04 (A.2). and Code § 2.2-4007.1 (C).

¹⁰ “Locality” can refer to either local governments or the locations in the Commonwealth where the activities relevant to the regulatory change are most likely to occur.

¹¹ Code § 2.2-4007.04 defines “particularly affected” as bearing disproportionate material impact.