

Office of Regulatory Management  
Economic Review Form

<b>Agency name</b>	State Board of Education
<b>Virginia Administrative Code (VAC) Chapter citation(s)</b>	n/a
<b>VAC Chapter title(s)</b>	n/a
<b>Action title</b>	Proposed Changes to Certain Testing Requirements for Writing
<b>Date this document prepared</b>	August 15, 2023
<b>Regulatory Stage (including Issuance of Guidance Documents)</b>	Issuance of guidance document

**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 &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>Direct Costs: There are no direct costs to this guidance document since local alternative assessments are required by § 22.1-253.13:3(C) of the Code of Virginia.</p> <p>Indirect Costs: There are no indirect costs to this guidance document since local alternative assessments are required by § 22.1-253.13:3(C) of the Code of Virginia.</p> <p>Direct Benefits: This guidance will allow greater flexibility to school divisions that opt to use the assessment developed by the Virginia Department of Education. In particular, school divisions that use the VDOE assessment will not need to pay to use the assessment of a third-party vendor or develop its own assessment. There may also be benefits in the administration of the tests since the VDOE assessment is part of an SOL assessment that is already required. There is no data available as to how many school divisions will avail themselves of the new assessment.</p> <p>Indirect Benefits: The new assessment is high-quality and will allow for greater evaluation of students.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>
<p>n/a</p>	<p>(a) 0</p>	<p>(b) indeterminate</p>
<p>(3) Net Monetized Benefit</p>	<p>indeterminate</p>	
<p>(4) Other Costs &amp; Benefits (Non-Monetized)</p>	<p>indeterminate</p>	
<p>(5) Information Sources</p>		

**Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>Direct Costs: The direct cost of the status quo compared to the proposed change is that school divisions do not have the option to save money by using the VDOE assessment.</p> <p>Indirect Costs: The indirect cost of the status quo compared to the proposed change is that local assessments may not offer the assessment quality and range of the VDOE assessment.</p>	
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	<p>Direct Benefits: There are no benefits of the status quo compared to the proposed change.</p> <p>Indirect Benefits: There are no indirect benefits of the status quo compared to the proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
n/a	(a) indeterminate	(b) indeterminate
(3) Net Monetized Benefit	indeterminate	
(4) Other Costs & Benefits (Non-Monetized)	indeterminate	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	There are no alternative approaches since the requirement for local alternative assessments is statutory, as is the Board guidance.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
n/a	(a) n/a	(b) n/a
(3) Net Monetized Benefit	n/a	
(4) Other Costs & Benefits (Non-Monetized)	n/a	
(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**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits (Monetized)</p>	<p>Direct Costs: There are no direct costs to local partners resulting from this guidance document since local alternative assessments are required by § 22.1-253.13:3(C) of the Code of Virginia.</p> <p>Indirect Costs: There are no indirect costs to local partners resulting from this guidance document since local alternative assessments are required by § 22.1-253.13:3(C) of the Code of Virginia.</p> <p>Direct Benefits: This guidance will allow greater flexibility to school divisions that opt to use the assessment developed by the Virginia Department of Education. In particular, school divisions that use the VDOE assessment will not need to pay to use the assessment of a third-party vendor or develop its own assessment. There may also be benefits in the administration of the tests since the VDOE assessment is part of an SOL assessment that is already required. There is no data available as to how many school divisions will avail themselves of the new assessment.</p> <p>Indirect Benefits: The new assessment is high-quality and will allow for greater evaluation of students.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct &amp; Indirect Costs</p>	<p>Direct &amp; Indirect Benefits</p>
<p>n/a</p>	<p>(a) indeterminate</p>	<p>(b) indeterminate</p>
<p>(3) Other Costs &amp; Benefits (Non-Monetized)</p>	<p>indeterminate</p>	
<p>(4) Assistance</p>	<p>This guidance will allow greater flexibility to school divisions that opt to use the assessment developed by the Virginia Department of Education.</p>	
<p>(5) Information Sources</p>		

**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**

<p>(1) Direct &amp; Indirect Costs &amp; Benefits</p>	<p>There is no impact on families.</p>
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(Monetized)		
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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)	There is no anticipated impact on small businesses.	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a)	(b)
(3) Other Costs & Benefits (Non-Monetized)		
(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
	<b>Statutory:</b>	<b>6</b>	0	0	0
	<b>Discretionary:</b>	<b>0</b>	0	0	0

### *Cost Reductions or Increases (if applicable)*

VAC Section(s) Involved	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
§ 22.1-253.13:3(C). Requirement for local alternative assessment for Grade 5 Writing	The Board is allowing school divisions to use the integrated reading and writing component of the Grade 5 SOL Reading test to fulfill the statutory requirement for a local alternative assessment in § 22.1-253.13:3(C).	The cost of local alternative assessments to school divisions will vary and is unable to be determined.	The option to use the integrated reading and writing component of the Grade 5 SOL Reading test to fulfill the statutory requirement has the potential to save school divisions money.	Indeterminate, but it is anticipated that some school divisions will save money.

### *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
§ 22.1-253.13:3(C). Requirement for local alternative assessment for Grade 5 Writing	The Board is allowing school divisions to use the integrated reading and writing component of the Grade 5 SOL Reading test to fulfill the statutory requirement for a local alternative assessment in §	The option to use the integrated reading and writing component of the Grade 5 SOL Reading test to fulfill the statutory requirement has the potential to save school divisions money.

	22.1-253.13:3(C).	

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

<b>Title of Guidance Document</b>	<b>Original Length</b>	<b>New Length</b>	<b>Net Change in Length</b>
Guidelines for Local Alternative Assessments: 2023-2024 and Beyond		1,793 words; 6 pages	