

Office of Regulatory Management
Economic Review Form

Agency name	State Board of Education
Virginia Administrative Code (VAC) Chapter citation(s)	8 VAC 20-120
VAC Chapter title(s)	Regulations Governing Career and Technical Education
Action title	Programmatic Accreditation Guidelines for Career and Technical Education
Date this document prepared	December 14, 2023
Regulatory Stage (including Issuance of Guidance Documents)	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 & Indirect Costs & Benefits (Monetized)</p>	<p>Direct Costs: Local school divisions have determined the national programmatic accreditation process to be a barrier to students. National accreditation costs and fees vary by organization. The process can last a year or more and often involves multiple staff members. As the number of programs requiring national accreditation alignment increases, the regulatory, cost, and fee burden on local school divisions also increases. In the last two years, increases in costs and fees for national programmatic accreditation standards have been identified for the career and technical education (“CTE”) pharmacy technician and culinary arts programs, which has resulted in some local school divisions reevaluating their program offerings considering the barriers.</p> <p>Indirect Costs: Any costs associated with the dissemination and monitoring of the programmatic accreditation guidelines will be provided by Department of Education according to state procurement policies and procedures.</p> <p>Direct Benefits: This guidance document opens a new path for meeting the definition of CTE in § 22.1-227.01, which has the potential to lower costs reduce fees and increase flexibility for local school divisions.</p> <p>Indirect Benefits: The purpose of this guidance document is to develop the establish state accreditation standards in order to open new pathways for programs to meet the statutory definition of CTE, when state accreditation standards for CTE do not currently exist. Historically, Virginia school divisions have deferred to national, rather than state accreditation standards, thereby limiting the flexibility of local school divisions and adversely impacting opportunities for student engagement. Local school divisions are strongly encouraged to adopt state CTE accreditation standards in order to effectively create pathways of students to high skill, high demand careers and post-secondary success. Accordingly, the net effect of this guidance document is deregulatory as it will allow more opportunities for local school divisions to qualify a program as CTE.</p>	
<p>(2) Present Monetized Values</p>	<p>Direct & Indirect Costs</p>	<p>Direct & Indirect Benefits</p>

	(a) \$0	(b) indeterminate
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	State accreditation standards will result in cost savings for local school divisions that opt out of meeting national programmatic accreditation standards. Fees and costs associated with national accreditation standards include but are not limited to application fees, travel related expenses for on-site visits, teacher certification testing, equipment, and membership renewal fees.	
(5) Information Sources		

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

(1) Direct & Indirect Costs & Benefits (Monetized)	<p>Direct Costs: Under the status quo, local school divisions will continue to face mounting financial barriers for maintaining or for obtaining national programmatic accreditation.</p> <p>Indirect Costs: Under the status quo, local school divisions will remain unable to develop new or continue to offer in demand CTE programs to their students.</p> <p>Under the status quo, the Department is unable to identify any direct or indirect benefits as the current methods limits CTE programmatic flexibility for local school divisions.</p> <p>Direct and Indirect Benefits No direct or indirect benefits are identified under the status quo.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) indeterminate	(b) \$0
(3) Net Monetized Benefit	\$0	
(4) Other Costs & Benefits (Non-Monetized)	While current costs remain, there are no additional 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)	<p>Direct Costs: The Department did not identify any alternative approaches that would lead to additional direct costs of this proposed change.</p> <p>Indirect Costs: The Department did not identify any alternative approaches that would lead to additional indirect costs of this proposed change.</p> <p>Direct Benefits: The Department did not identify any alternative approaches that would lead to additional direct benefits of this proposed change.</p> <p>Indirect Benefits: The Department did not identify any alternative approaches that would lead to additional indirect benefits of this proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Net Monetized Benefit		
(4) Other Costs & Benefits (Non-Monetized)	No other practical alternatives to adopting the guidance document 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)	<p>Direct Costs: The Department did not identify any impacts on local partners that would lead to additional direct costs as a result this proposed change.</p> <p>Indirect Costs: The Department did not identify any impacts on local partners that would lead to additional indirect costs as a result of this proposed change.</p> <p>Direct Benefits:</p>	
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	<p>The Department identified decreased costs as a direct beneficial impact on local partners that would lead to additional direct benefits as a result of this proposed change.</p> <p>Indirect Benefits: The Department identifies decreased indirect costs as a beneficial impact on local partners that would lead to additional indirect benefits as a result of this proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	By adopting this guidance document, it is not predicted that it will impose any costs or provide any benefits to local partners.	
(4) Assistance		
(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: The Department did not identify any impacts on families that would lead to additional direct costs as a result this proposed change.</p> <p>Indirect Costs: The Department did not identify any impacts on families that would lead to additional indirect costs as a result this proposed change.</p> <p>Direct Benefits: The Department did not identify any impacts on families that would lead to additional direct benefits as a result this proposed change.</p> <p>Indirect Benefits: The Department did not identify any impacts on families that would lead to additional indirect benefits as a result this proposed change.</p>
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(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	\$0	
(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: The Department did not identify any impacts on small businesses that would lead to additional direct costs as a result this proposed change.</p> <p>Indirect Costs: The Department did not identify any impacts on small businesses that would lead to additional indirect costs as a result this proposed change.</p> <p>Direct Benefits: The Department did not identify any impacts on small businesses that would lead to additional direct benefits as a result this proposed change.</p> <p>Indirect Benefits: The Department did not identify any impacts on small businesses that would lead to additional indirect benefits as a result this proposed change.</p>	
(2) Present Monetized Values	Direct & Indirect Costs	Direct & Indirect Benefits
	(a) \$0	(b) \$0
(3) Other Costs & Benefits (Non-Monetized)	\$0	
(4) Alternatives		

(5) Information Sources	
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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
N/A	Statutory:				
	Discretionary:				
				Total Net Change of Statutory Requirements:	
				Total Net Change of Discretionary Requirements:	

Cost Reductions or Increases (if applicable)

VAC Section(s) Involved*	Description of Regulatory Requirement	Initial Cost	New Cost	Overall Cost Savings/Increases
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
8 VAC 20-120	Decreases in regulatory stringency	This guidance document opens a new path for meeting the definition of CTE in § 22.1-227.01, which has the potential to lower costs reduce fees and increase flexibility for local school divisions. Accordingly, the net effect of this guidance document is deregulatory as it will allow more opportunities for school divisions to qualify a program as CTE.

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

Title of Guidance Document	Original Length	New Length	Net Change in Length
Programmatic Accreditation Guidelines for Career and Technical Education		15 pages (2749 words)	N/A new guidance document

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