

Office of Regulatory Management
Economic Review Form

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|--|-------------------------------------|
| Agency name | State Board of Education |
| Virginia Administrative Code (VAC) Chapter citation(s) | 8VAC20-132 |
| VAC Chapter title(s) | Virginia Standards of Accreditation |
| Action title | Update to Guidance Document |
| Date this document prepared | September 4, 2025 |
| Regulatory Stage (including Issuance of Guidance Documents) | Update to 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)

| | | |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There are no indirect or direct monetized costs or benefits resulting from the updates to the guidance document. | |
| (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) | <p>The proposed updates are necessary to ensure appropriate notation of course enrollments in the Master Schedule Collection (MSC) by school divisions and that appropriate credits are used to satisfy graduation requirements, as well as to clarify answers to common questions. The <i>Board of Education Approved Courses to Satisfy Graduation Requirements for the Standard and Advanced Studies Diplomas in Virginia Public Schools</i> offers students greater flexibility to meet graduation requirements by allowing course substitutions to satisfy graduation requirements. The course substitutions within this document do not impede other legislation, such as Seat Time Flexibility or 140-clock hour waivers.</p> <p>For Virginia students pursuing an International Baccalaureate (IB) Diploma or International Baccalaureate (IB) course candidates, the added language provides clarification for school divisions and families about earning the EPF graduation requirement through IB Economics or IB Business Management.</p> <p>Several school divisions have requested clarification about the use of IB Economics and IB Business Management to meet the EPF graduation requirement. The addition of explicit language, including the Code of Virginia reference, to this document eliminates further confusion in the field. Stakeholders also asked for clarification on the need to take Algebra II prior to Data Science. This was included in a Data Science Frequently Asked Questions document but was not explicit in this document.</p> | |
| (5) Information Sources | | |

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

| | | |
|--|--|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | There are no indirect or direct monetized costs or benefits 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 lacks appropriate notation of course enrollments in the MSC, as well as lacks text which provides clarifying information concerning earning the EPF graduation requirement through IB Economics or IB Business Management. The status quo also lacks clarifying language requested by stakeholders. | |
| (5) Information Sources | | |

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

| | | |
|--|---|----------------------------|
| (1) Direct & Indirect Costs & Benefits (Monetized) | No alternative approaches to the proposed changes to the guidance document were considered. | |
| (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) | No alternative approaches to the proposed changes to the guidance document were considered. | |
| (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) | There are no direct or indirect monetized costs or benefits resulting from the proposed changes to the guidance document. | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) | (b) |
| (3) Other Costs & Benefits (Non-Monetized) | <p>The proposed updates are necessary to ensure appropriate notation of course enrollments in the Master Schedule Collection (MSC) by school divisions and that appropriate credits are used to satisfy graduation requirements, as well as to clarify answers to common questions. The <i>Board of Education Approved Courses to Satisfy Graduation Requirements for the Standard and Advanced Studies Diplomas in Virginia Public Schools</i> offers students greater flexibility to meet graduation requirements by allowing course substitutions to satisfy graduation requirements. The course substitutions within this document do not impede other legislation, such as Seat Time Flexibility or 140-clock hour waivers.</p> <p>For Virginia students pursuing an International Baccalaureate (IB) Diploma or International Baccalaureate (IB) course candidates, the added language provides clarification for school divisions and families about earning the EPF graduation requirement through IB Economics or IB Business Management.</p> <p>Several school divisions have requested clarification about the use of IB Economics and IB Business Management to meet the EPF graduation requirement. The addition of explicit language, including the Code of Virginia reference, to this document eliminates further confusion in the field. Stakeholders also asked for clarification on the need to take Algebra II prior to Data Science. This was included in a Data Science Frequently Asked Questions document but was not explicit in this document.</p> | |
| (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) | There are no direct or indirect monetized costs or benefits resulting from the proposed changes to the guidance document. | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) N/A | (b) N/A |
| (3) Other Costs & Benefits (Non-Monetized) | <p>The proposed updates are necessary to ensure appropriate notation of course enrollments in the Master Schedule Collection (MSC) by school divisions and that appropriate credits are used to satisfy graduation requirements, as well as to clarify answers to common questions. The <i>Board of Education Approved Courses to Satisfy Graduation Requirements for the Standard and Advanced Studies Diplomas in Virginia Public Schools</i> offers students greater flexibility to meet graduation requirements by allowing course substitutions to satisfy graduation requirements. The course substitutions within this document do not impede other legislation, such as Seat Time Flexibility or 140-clock hour waivers.</p> <p>For Virginia students pursuing an International Baccalaureate (IB) Diploma or International Baccalaureate (IB) course candidates, the added language provides clarification for school divisions and families about earning the EPF graduation requirement through IB Economics or IB Business Management.</p> <p>Several school divisions have requested clarification about the use of IB Economics and IB Business Management to meet the EPF graduation requirement. The addition of explicit language, including the Code of Virginia reference, to this document eliminates further confusion in the field. Stakeholders also asked for clarification on the need to take Algebra II prior to Data Science. This was included in a Data Science Frequently Asked Questions document but was not explicit in this document.</p> | |
| (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) | The guidance document has no 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 | Total Net Change in Requirements |
|--|---------------------|---------------|-----------|--------------|----------------------------------|
| | (M/A): | | | | |
| | (D/A): | | | | |
| | (M/R): | | | | |
| | (D/R): | | | | |
| Grand Total of Changes in Requirements: | | | | | (M/A): |
| | | | | | (D/A): |
| | | | | | (M/R): |
| | | | | | (D/R): |

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 |
|--------------------------|---------------------------------------|--------------|----------|--------------------------------|
| | | | | |
| | | | | |

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 |
|--------------------------|----------------------------------|---|
| | | |
| | | |

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 |
|--|----------------------------|-----------------------|---------------------------------|
| Board of Education Approved Courses to Satisfy Graduation Requirements for the Standard, Advanced Studies, and Modified Standard Diplomas in Virginia Public Schools | 3,748 | 4,002 | 254 |
| | | | |

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