

**Statement of Administrative Impact and Projected Costs of Implementing the
Proposed Revisions to 8 VAC 20-131-10 et. seq., Regulations Establishing
Standards for Accrediting Public Schools in Virginia**

Prior to the adoption of any regulation affecting school divisions, § 22.1-17 of the Code of Virginia requires that the Board of Education and the Department of Education prepare a statement of the administrative impact of such regulation on school divisions and the projected costs of implementing and complying with such regulation. The Department is required to send a copy thereof to each division superintendent.

The Board of Education is in the process of revising its Regulations Establishing Standards for Accrediting Public Schools in Virginia. The proposed revisions were initially published in the November 22, 1999 edition of the Virginia Register of Regulations. This analysis is based on revisions to that proposal.

Authority: Section 22.1-19 of the Code of Virginia requires that the Board of Education prescribe standards and provide for the accreditation of public elementary, middle, and secondary schools.

Purpose: The regulations define the requirements for accrediting public schools in Virginia. They set the minimum standards necessary for each school in the Commonwealth to provide the foundation for high quality education programs with the goal of preparing the children of the commonwealth to become self-sufficient and informed citizens. Those standards form the basis for the day-to-day operation of the educational program in each public school in Virginia.

Substance: The current regulations contain provisions governing:

- ❑ philosophy, goals, and objectives for each school;
- ❑ student academic achievement, including student expectations, testing requirements, and graduation requirements;
- ❑ instructional programs for elementary, middle, and secondary schools;
- ❑ roles and responsibilities of the principal(s), professional teaching staff, and support staff, as well as staffing requirements;
- ❑ school facilities and safety;
- ❑ school and community communications, including a school performance report card; and
- ❑ accreditation of schools, including school-level expectations, reporting requirements, and procedures for accreditation.

Statement of Administrative Impact and Projected Costs of Implementing the Proposed Revisions to 8 VAC 20-131-10 et. seq., Regulations Establishing Standards for Accrediting Public Schools in Virginia

Summary of the Proposed Regulations: Most of the requirements set forth in the current Regulations Establishing Standards for Accrediting Public Schools in Virginia (8 VAC 20-130-10 et. seq.) will be retained. The primary purposes of the revisions to the October proposal are:

- ❑ Clarification of language consistencies in the current regulations
- ❑ Refinement of the new accreditation ratings
- ❑ Consequences for schools that fail to meet the accountability requirements
- ❑ Student-level consequences related to the testing program and the impact on the school's accreditation rating

The primary changes are designed to:

- ❑ Establish requirements for students to retake SOL test
- ❑ Expand the provisions for students to earn verified credits for graduation
- ❑ Revert back to language in the September 1997 SOA regarding planning time requirements for secondary teachers
- ❑ Address the issues of instructional time and scheduling configurations
- ❑ Establish a new diploma, the Basic Diploma, for students with disabilities and certain other students who may not be able to meet the requirements for the Standard Diploma
- ❑ Revise awards for exemplary student performance in academic, career and technical, and as prescribed by the General Assembly, in advanced math and technology
- ❑ Clarify language regarding transfer students, additional course requirements for transfer students, and the Board's relationship with VCPE
- ❑ Provide elementary school students with required daily recess
- ❑ Allow the division superintendent to permit certain students to sit for end-of-course SOL tests when the student meets certain criteria

Statement of Administrative Impact and Projected Costs of Implementing the Proposed Revisions to 8 VAC 20-131-10 et. seq., Regulations Establishing Standards for Accrediting Public Schools in Virginia

- ❑ Expand factors to be considered in determining the accreditation ratings for schools
- ❑ Require that a school's promotion and retention policies be reviewed as part of the pre-accreditation eligibility process
- ❑ Modify the titles of the school accreditation ratings to better describe where a school is in the accreditation process
- ❑ Refine the application of accreditation ratings
- ❑ Allow the Board to enact special provisions related to the administration and use of SOL tests
- ❑ Modify the Provisional Accreditation Benchmarks

Estimated Administrative Impact: The 1997 revision of the regulations shifted the focus of the Board of Education's accrediting process from a process model to a model that evaluates schools based on student performance. This proposal further clarifies some of the provisions of the October 1999 proposed revisions to the 1997 version of the standards and adds new requirements for local school officials. New administrative features include the following:

- ❑ Local school boards must adopt policies for:
 - Determining employability skills as required for the Basic Diploma
 - Permitting parents of students below the ninth grade who take credit-bearing courses to request to have those courses omitted from the high school transcript
 - Awarding verified credits for a student whose performance on SOL tests is not consistent with recognized indicators of academic achievement
- ❑ Division superintendents must:
 - Certify to the DOE compliance with the standard that requires distribution of the SOL and the state's and division's promotion and retention policies no later than the end of the first semester

Statement of Administrative Impact and Projected Costs of Implementing the Proposed Revisions to 8 VAC 20-131-10 et. seq., Regulations Establishing Standards for Accrediting Public Schools in Virginia

- Public schools must :
 - Expand record keeping for:
 - ◆ Transfer students whose graduation requirements may be different based on the proposed revisions
 - ◆ Students who chose to substitute approved alternative means of earning verified units of credit in lieu of using SOL tests
 - Provide a daily recess for all students in elementary school

Projected Costs of Implementation: Under the current methodology for calculating the Standards of Quality costs, the proposed changes would not have an impact on state SOQ funding because the majority of the SOQ cost for each school division is based on the required number of teachers using a statutorily prescribed pupil-teacher ratio. Other support costs are based on a statewide prevailing cost per pupil. These regulations do not change the pupil-teacher ratio, administrative and support staff ratio, or the number of courses schools are required to offer, which ultimately determine the number of positions to be funded in the SOQ. Likewise, they do not change the methodology used to determine the statewide prevailing support costs; therefore, the state's share of Standards of Quality funding is not impacted by these regulatory changes. Additionally, the proposed changes do not impact other sources of state funding to school divisions.

While most of the requirements are already being met, there is the potential for an increase in the cost of implementing the proposed revisions for the following initiatives:

- Providing students and parents with information about the school division's promotion and retention policies as well as the promotion and retention policy prescribed by the Board of Education
 - ⇒ Schools will be required to provide parents with information concerning these policies. Costs associated with this requirement will include the production and distribution of material and the staff time necessary to gather, produce, and analyze it. The Department will bear the cost of distributing the state's promotion and retention policy.
- Each elementary school shall provide students with daily recess during the regular school year as determined appropriate by the school

Statement of Administrative Impact and Projected Costs of Implementing the Proposed Revisions to 8 VAC 20-131-10 et. seq., Regulations Establishing Standards for Accrediting Public Schools in Virginia

- ⇒ Schools that currently meet the minimum of 5 ½ instructional hours per day may have to extend the school day to provide for student recess.
- Any school employing a scheduling configuration that provides less than 140 clock hours of instruction for core academic areas may retain that scheduling configuration until the end of the 2000-01 school year.
 - ⇒ Schools that currently do not meet the 140 clock hour requirement will be required to adjust the school's daily schedule to ensure the requirement is met in each of the four core areas.

Questions regarding the standards may be directed to the Office of Accreditation, Virginia Department of Education at 804.786.9421.