



VIRGINIA BOARD OF EDUCATION

AGENDA ITEM

Agenda Item: E

Date: March 17, 2022

Title: Final Review of Proposed Revisions to the *Regulations Governing Secondary School Transcripts* (8 VAC 20-160-10, et. seq) (Final Stage)

Presenter: Dr. Samantha Hollins, Assistant Superintendent for Special Education and Student Services

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Purpose of Presentation:

Action required by state or federal law or regulation.

Executive Summary

Changes in professional practice at postsecondary institutions and business and industry necessitated revisions to the *Regulations Governing Secondary School Transcripts* (8VAC20-160-10, et. seq). The proposed revisions will better serve the students of the Commonwealth by aligning elements contained in the student transcript to the needs and demands of postsecondary partners.

The *Regulations Governing Secondary School Transcripts* are composed of the following sections: Definitions, Effective date, Format options, Profile data sheet, Advanced-level courses, and Elements for weighting.

The last full revision to the *Regulations Governing Secondary School Transcripts* was approved by the Virginia Board of Education (Board) in 2007.

In May 2019, a stakeholder group consisting of representatives from K-12, institutions of higher education, the Parent Education Advocacy Training Center (PEATC), and the Virginia Department of Education (VDOE) offices of Special Education, Student Services, and Technology convened to discuss important issues around high school transcripts and provide

suggestions for proposed revisions. Further feedback was provided through a questionnaire from institutions of higher education.

The Board approved the Notice of Intent for Regulatory Action (NOIRA) at the July 25, 2019, meeting. The NOIRA was published for public comment on September 16, 2019, and closed on October 16, 2019. There were no public comments received through Town Hall or submitted through the Board's email address.

The *Regulations Governing Secondary School Transcripts* were accepted for first review by the Board at the January 23, 2020, meeting. One revision was made as a result of Board feedback. The definition of "Verified unit of credit" or "verified credit" was changed to accurately reflect the definition provided in the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* (SOA), 8VAC20-131-5. The proposed regulations were accepted for final review of the proposed stage under consent agenda at the May 7, 2020, meeting. The proposed revisions were then submitted for executive branch review pursuant to the *Administrative Process Act*.

There were six public comment submissions through Town Hall. Four comments expressed support for the change of making test scores on transcripts an "opt-in" instead of "opt-out." One comment expressed concern that section 8 VAC 20-160-60, Elements for Weighting, was not included in the revision proposal. VDOE staff communicated to the constituent that the section was not added because there were no proposed changes being considered. The last comment expressed concern about 8 VAC 20-160-50, Weight of advanced-level courses, and the proposed change of the language from "shall" to "may" for divisions determining courses and programs to receive weighted credits. The concern was that there would be inconsistencies between the grade point averages of students achieving the same grades in the same courses, but who live in different school divisions. The proposed change in language will still allow divisions to continue to set weighting policy based on the best interest of their students, in particular those students who may not have equitable access to advanced-level courses.

VDOE staff has made minor technical edits to provide clarity and consistency in the language of the regulations. For example, the term "secondary" was replaced by the term "high school" in all sections where the term "secondary" was used to describe the student transcript, profile data, or courses. This will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with language in the forthcoming SOA revisions. No revisions to the proposed regulations have been made since first review (final stage).

The revision supports the *Profile of a Virginia Graduate*, and *Priority 3* of the Board's *Comprehensive Plan*, by providing accurate and meaningful transcript information to show students have gained the knowledge, skills, competencies, and experiences during their K-12

education to make them “life-ready” and be on a path to successful citizenship and participation in the evolving global economy.

Action Requested:

Final review: Action requested at this meeting.

Superintendent’s Recommendation

The Superintendent of Public Instruction recommends that the Board of Education approve the *Regulations Governing Secondary School Transcripts* (8VAC20- 160-10, et. seq).

Previous Review or Action:

Date: January 22, 2022

Action: First Review (final stage)

Date: May 7, 2020

Action: Final Review (proposed stage)

Date: January 23, 2020

Action: First Review (proposed stage)

Date: July 25, 2019

Action: Final Review (NOIRA stage)

Background Information and Statutory Authority:

The last comprehensive revision to the *Regulations Governing Secondary School Transcripts* was made by the Board in 2007. Changes in professional practice and postsecondary expectations warrant a revision to align with the needs of our students, parents, and postsecondary stakeholders.

In May 2016, the Board approved an amendment to the wording of 8VAC20-160-30, Item #25, of the *Regulations Governing Secondary School Transcripts*, to add an opt-out policy to allow flexibility to certain students who did not want standardized test scores sent to postsecondary institutions. The amendment to add the opt-out policy was a result of numerous educator and constituent calls expressing concern with the mandate to send standardized test scores as a part of the official transcript.

Superintendent Memorandum [#133-18](#) was released May 21, 2018, to address some of the urgent issues related to information contained on the transcript and stated that the revision process for the *Regulations Governing Secondary School Transcripts* would begin in 2019.

In May 2019, a stakeholder group consisting of representatives from K-12, institutions of higher education, the Parent Education Advocacy Training Center (PEATC), and VDOE Special Education, Student Services, and Technology staff convened to discuss important issues around high school transcripts and provide suggestions for proposed revisions. Further feedback was provided through a questionnaire from the following institutions of higher education: University of Virginia College at Wise, James Madison University, Virginia Tech, Richard Bland College, George Mason University, University of Mary Washington, College of William and Mary, Old Dominion University, and Virginia Commonwealth University.

The NOIRA was approved by the Board at the July 25, 2019, meeting. The NOIRA was published for public comment on September 16, 2019, and closed on October 16, 2019. There were no public comments received through Town Hall or submitted through the Board's email address.

The *Regulations Governing Secondary School Transcripts* were accepted for first review by the Board at the January 23, 2020, meeting. One revision was made as a result of Board feedback. The definition of "verified unit of credit" or "verified credit" was changed to accurately reflect the definition provided in the *Regulations Establishing Standards for Accrediting Public Schools in Virginia* (SOA), 8VAC20-131-5.

The *Regulations Governing Secondary School Transcripts* were accepted for final review of the proposed stage under consent agenda at the May 7, 2020, meeting. The proposed revisions were then submitted to the Office of the Attorney General which completed its review of the regulations on July 17, 2020. The Department of Planning & Budget completed its review of the regulations on September 2, 2020, and submitted the proposed regulations for consideration to the Secretary of Education. The Secretary of Education completed its review on September 18, 2020. The Governor's office completed its review and approved the regulations on July 22, 2021. The *Regulations Governing Secondary School Transcripts* were placed on Town Hall for public comment on September 13, 2021, and closed on November 12, 2021.

There were six public comment submissions through Town Hall. Four comments expressed support for the change of making test scores on transcripts an "opt-in" instead of "opt-out." One comment expressed concern that section 8 VAC 20-160-60, Elements for Weighting, was not included in the revision proposal. VDOE staff communicated to the constituent that the section was not added because there were no proposed changes being considered. The last comment expressed concern about 8 VAC 20-160-50, Weight of advanced-level courses, and the proposed change of the language form "shall" to "may" for divisions determining courses and programs to receive weighted credits. The concern was that there would be inconsistencies between the grade

point averages of students achieving the same grades in the same courses, but who live in different school divisions. VDOE staff communicated to the constituent that inconsistencies already exist between divisions now due to differing policies on weighting courses. Postsecondary institutions have protocol in place to assess advanced-level courses consistently and equitably for student admissions. The proposed change in language will still allow divisions to continue to set weighting policy based on the best interest of their students, in particular those students who may not have equitable access to advanced-level courses.

The *Regulations Governing Secondary School Transcripts* were placed on Town Hall for public comment on September 13, 2021, and closed on November 12, 2021. There were six public comment submissions through Town Hall.

The Board's regulatory authority is found in [§22.1-16 of the Code of Virginia](#).

Timetable for Further Review/Action:

Upon Board approval, the proposed revisions to the *Regulations Governing Secondary School Transcripts* will be submitted to Town Hall for Executive Branch Review, pursuant to the Administrative Process Act.

Impact on Fiscal and Human Resources:

No significant fiscal or human resource impact is expected for school divisions or the Department. The VDOE staff members will provide technical assistance to school divisions through website documents and training events.

Comprehensive Revisions to the Regulations Governing Secondary School Transcripts

****The text in red are the previously approved revisions from the proposed stage. New revisions for the final stage are noted in blue. ****

8VAC20-160-10. Definitions.

The following words and terms when used in this chapter shall have the following meanings unless the context clearly indicates otherwise:

~~"Accelerated course" means a course that can be completed in less than the normal amount of time; the process of progressing through the school grades at a rate faster than that of the average student, either by skipping grades or by rapidly mastering the work of one course and moving on to the next higher course.~~

"Advanced-level courses/programs courses or programs" means those academic, career/technical, fine and performing arts, or interdisciplinary high school courses/programs that enable students to acquire and master advanced knowledge. ~~Such courses may be suitable for weighted credit in order to encourage students to take these courses and to be rewarded for the extra endeavor and academic performance these courses/programs require.~~

"Advanced Placement (AP) course" means an advanced-level course with a syllabus equivalent ~~to the relevant Advanced Placement syllabus disseminated~~ approved by the College Board.

"Assessment component" means any of the means by which one obtains information on the progress of the learner and the effectiveness of instruction; quantitative data, objective measures, subjective impressions, tests, and observations may all serve as instruments for deciding whether instructional objectives have been attained.

"Certificate of Program Completion award date" means the date when a Certificate of Program Completion is awarded. A Certificate of Program Completion is not ~~to be included as~~ a diploma option, as provided in 8VAC20-131-50 and 8VAC20-131-51.

~~"Commonwealth College Course Collaborative (CCCC)" means a set of approved courses taken in high school that fully transfer as core requirements and degree credits at Virginia colleges and universities.~~

~~"Commonwealth Scholar" means a student who completes all of the requirements for at least a Standard Diploma and additional prescribed rigorous coursework in foreign language, history, mathematics, science, and other approved discipline areas consistent with the United States Department of Education's State Scholars Initiative.~~

~~"Credit" means a standard or a verified credit as specified in Regulations Establishing Standards for Accrediting Public Schools in Virginia (8VAC20-131).~~

"Credit summary" means the number of courses successfully completed in each discipline as required for graduation.

~~"Curriculum" means an official guide prepared for use by administrators, supervisors, and teachers of a particular school or school system as an aid to teaching in a given subject or area of study for a given grade; includes the goals and objectives of the course, the expected outcomes, assessment component, and the scope and nature of the materials to be studied.~~

"Curricular program" means the overarching academic or special programs available at an individual school or within a school division. Examples include Advanced Placement, International

Baccalaureate, Dual Enrollment, Career and Technical Education (CTE) academy or magnet programs, or early college.

"Dual enrollment course" means a course, which may be advanced-level, that carries both high school and college credit.

"Early College Scholar" means a student who signs the Early College Scholars agreement and completes the requirements of the program, which includes a prescribed number of potentially transferable college credits, maintaining a "B" average or better, and earning an Advanced Studies diploma.

"Grade point average" means a measure of average scholastic success in all high school credit-bearing courses taken by a student during a certain term or semester, or accumulated for several terms or semesters; obtained by dividing grade points by number of courses taken.

"Graduation date" means the date when diploma requirements have been met and a diploma is awarded.

["High school course" means a course of study that awards high school credits.]

["High school profile data" means information given in a summary format of a particular high school.]

["High school transcript" means an official list of high school courses taken by a student, except those purged from a middle school record in accordance with 8VAC20-131, Regulations Establishing Standards for Accrediting Public Schools in Virginia, showing the final grade received for each course, with definitions of the various grades given.]

"Honors course" means a an advanced-level course offered to academically advanced students to provide opportunities to study and learn with other advanced students and to accelerate their learning in a specific content area. These courses are designed to be more challenging by covering additional topics or some topics in greater depth providing students an opportunity to deepen their knowledge and understanding in a specific content area through additional rigor and course extensions beyond minimum state standards.

"Industry certification credential" means a career and technical education credential that is earned by successfully completing a Board of Education-approved industry certification examination, a state-issued professional license, or an occupational competency examination.

"International Baccalaureate (IB) course" means an advanced-level course with a syllabus approved by the International Baccalaureate Organization (IBO) and meeting the criteria offered through the IBO program.

[~~"Secondary course" means a high school level course of study that awards high school credits.~~] ~~In addition to providing content and knowledge, secondary courses encourage students to develop higher level thinking skills such as problem solving, critical analyses and syntheses of ideas. Students are encouraged to understand, appreciate, and formulate ideas related to scientific, technical and social concepts.~~

[~~"Secondary school profile data" means information given in a summary format of a particular secondary school~~] ~~; such as location; description; achievement data; definition of curriculum; grading scale, grade distribution; weighted grades; rank in class, if a ranking procedure is used; graduation requirements; and an explanation of advanced level, accelerated, and honors courses, industry certifications, and other specialized programs [-]~~

[~~"Secondary school transcript" means an official list of secondary courses taken by a student, except those purged from a middle school record in accordance with 8VAC20-131, Regulations Establishing Standards for Accrediting Public Schools in Virginia, showing the final grade received for each course, with definitions of the various grades given.~~]

"Standard unit of credit" or "standard credit" means credit awarded for a course in which the student successful completes (i) 140 clock hours of instruction and the requirements of the course or (ii) alternative requirements to the 140-clock hours of instruction as developed by a local school division as provided for in 8VAC20-131-110.

"Verified unit of credit" or "verified credit" means credit awarded for a course in which a student earns a standard unit of credit and (i) achieves a passing score on a corresponding end-of-course SOL test; (ii) achieves a passing score on an additional test as defined in 8VAC20-131-5 as part of the Virginia Assessment Program; (iii) meets the criteria for the receipt of a locally awarded verified credit conferred in accordance with board criteria and guidelines as provided in 8VAC20-131-110 B 3 when the student has not passed a corresponding SOL test in English, mathematics, laboratory science, or history and social science; or (iv) meets the criteria for the receipt of a verified credit for English (writing) by demonstrating mastery of the content of the associated course on an authentic performance assessment, as provided in 8VAC20-131-110 B 4.

"Weighted course" means an advanced-level course in which credit is increased as determined by local school board policies and defined on the school profile.

8VAC20-160-20. Effective date.

The [[secondary high](#)] school transcript regulations shall become effective for students who take [[secondary high school](#)] courses for credit beginning in 2008-2009 [[2020-2024 2022-2023](#)] .

8VAC20-160-30. Format options.

Localities have options for the [[secondary high](#)] school transcript format. They may use the Department of Education model or develop their own following board regulations. Localities ~~may also~~ are encouraged to use a digital data exchange format (XML is preferred) for electronic transcript transmission whenever possible. The accreditation status of a high school shall not be included on the student transcript provided to colleges, universities, or employers.

The required information is as follows:

1. Name of school division;
2. Student legal name;
3. State Testing Identifier (STI);
4. Birthdate;
- ~~5. Gender;~~
- ~~6. Home~~ 5. Primary address;
- ~~7. Home telephone~~ 6. Primary phone number;
- ~~8. 7.~~ Graduation date;
- ~~9. 8.~~ Type of diploma, ~~to include from the following:~~ "Advanced Studies," "Standard," or "Other Diplomas Authorized by the Board of Education";
- ~~10. 9.~~ Type of industry certification credential and date of completion, if applicable;
- ~~11. 10.~~ Certificate awarded, either a High School Equivalency test (eg., GED, HiSet, TASC) or Certificate of Program Completion and award date, if applicable no diploma has been awarded;
11. Completion of training in First Aid, Cardiopulmonary Resuscitation (CPR), and Automated External Defibrillator (AED);
12. Notation of Early College Scholar Designation;
- ~~13. Notation of Commonwealth Scholar Designation;~~

- ~~14. 13. Name, address, email address, and telephone number of schools student attended each year each school at the time at which high school credits were awarded, address of school, and telephone number;~~
- ~~15. 14. Number of days absent within any given school year in which the student is taking courses for high school credit;~~
- ~~16. Course 15. All high school credit bearing course work listed by year with grades to include all repeated courses except those purged from a middle school record in accordance with, Regulations Establishing Standards for Accrediting Public Schools in Virginia (8VAC20-131);~~
- ~~17. 16. Total credits earned by year;~~
- ~~18. 17. A list of verified credits earned, including any credits earned by substitution;~~
- ~~19. Credits 18. Standard and verified credits to date;~~
- ~~20. 19. Grade point average;~~
- ~~21. Credit 20. Overall standard credit summary for entire school experience;~~
- ~~22. 21. Key to symbols and abbreviations used to denote accelerated courses, advanced-level courses, Commonwealth College Course Collaborative courses, honors courses, and summer school courses, or credits earned by substitution;~~
- ~~23. 22. Notification of whether school/program ranks students; if so, the rank in class with given number of semesters used for computation;~~
- ~~24. 23. Final driver education grade;~~
- ~~25. Test record, to include at least the highest score earned, if applicable, on college performance-related standardized tests such as SAT and ACT, excluding Standards of Learning (SOL) test scores, except that each 24. A local school board shall may adopt a policy setting forth ~~the a~~ procedure by which parents, guardians, or others having legal control or charge can elect in writing to have their child's standardized test ~~record excluded from scores, such as SAT and ACT, included in the~~ student transcript (opt ~~out~~ in);~~
- ~~26. 25. Signature and title of school official or transmission through a secure and verified electronic method;~~
- ~~27. 26. Date of school official signature or transmission through a secure and verified electronic method;~~
- ~~28. 27. School name;~~
- ~~29. 28. School address;~~
- ~~30. 29. Telephone number of school;~~
- ~~31. 30. Fax number of school;~~
- ~~32. 31. The school's Department of Education College Entrance Examination Board (CEEB) 7-digit code number.~~

8VAC20-160-40. Profile data sheet.

A [[secondary high](#)] school profile data sheet, for each school reflected on the transcript, if applicable, shall be attached to each student transcript sent to colleges, universities, and prospective employers. Schools may furnish additional information. The accreditation status of a high school shall not be included on the school profile data sheet. No standard format is required. The profile data sheet must contain the following information:

1. Name of school counseling director or school counselor;
2. Name, address, and telephone number of school;

3. Description - school/community;
4. Achievement data to include SAT ~~and/or~~ or ACT scores using the most recent data available in comparison with Virginia and the nation;
5. Description of ~~curriculum~~ curricular progress;
6. Grading scale;
- ~~7. Grade distribution;~~
- ~~8. 7.~~ Explanation of advanced-level, ~~accelerated, and honors~~ courses;
- ~~9. 8.~~ Weighted grades, explanation of weighting courses and the computation, if applicable;
- ~~10. 9.~~ Explanation of rank in class, if applicable:
 - a. List courses excluded from computation;
 - b. Explanation of computation of pass/fail courses;
 - c. Student groups included/excluded from ranking in class;
- ~~11. 10.~~ Graduation requirements.

8VAC20-160-50. Weight of advanced-level courses.

~~Advanced Placement (AP) and International Baccalaureate (IB)~~ Advanced-level courses ~~shall~~ may be weighted. Local school boards shall determine which other courses/programs are to receive weighted credits, the amount of weight such courses shall receive, and how those weighted credits will be used in the determination of grade point averages in the school or school division. Local school boards shall consider equitable access to advanced-level courses when determining weighting.



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Final Regulation Agency Background Document

Agency name	Department of Education
Virginia Administrative Code (VAC) Chapter citation(s)	8VAC20-160-10 et seq.
VAC Chapter title(s)	<i>Regulations Governing Secondary School Transcripts</i>
Action title	Comprehensive Revisions of the Regulations Governing Secondary School Transcripts
Date this document prepared	January 27, 2022

This information is required for executive branch review and the Virginia Registrar of Regulations, pursuant to the Virginia Administrative Process Act (APA), Executive Order 14 (as amended, July 16, 2018), the Regulations for Filing and Publishing Agency Regulations (1VAC7-10), and the *Form and Style Requirements for the Virginia Register of Regulations and Virginia Administrative Code*.

Brief Summary

Provide a brief summary (preferably no more than 2 or 3 paragraphs) of this regulatory change (i.e., new regulation, amendments to an existing regulation, or repeal of an existing regulation). Alert the reader to all substantive matters. If applicable, generally describe the existing regulation.

Changes in professional practice at postsecondary institutions and business and industry necessitated revisions to the *Regulations Governing Secondary School Transcripts* (8VAC20-160-10, et. seq). The Board of Education is proposing revisions that best serve the students of the Commonwealth by aligning elements contained in the student transcript to the needs and demands of postsecondary partners.

The *Regulations Governing Secondary School Transcripts* are composed of the following sections: Definitions, Effective date, Format options, Profile data sheet, Advanced-level courses, and Elements for weighting.

The last full revision to the *Regulations Governing Secondary School Transcripts* was approved by the Board of Education ("Board") in 2007.

In May 2016, the Board approved an amendment to the wording of [8VAC20-160-30](#) 25 of the *Regulations Governing Secondary School Transcripts* in order to add an opt-out policy that allows flexibility to certain students who did not want standardized test scores sent to postsecondary institutions. The amendment to add the opt-out policy was the result of numerous educator and constituent calls expressing concern with the mandate to send standardized test scores as a part of the official transcript.

The Notice of Intent for Regulatory Action (NOIRA) was approved by the Board at the July 25, 2019, meeting. The NOIRA was published for public comment on September 16, 2019, and closed on October 16, 2019. There were no public comments received through Town Hall or submitted through the Board's email address.

The Regulations Governing Secondary School Transcripts were accepted for first review by the Board at the January 23, 2020, meeting. One revision was made as a result of Board feedback. The definition of "Verified unit of credit" or "verified credit" was changed to accurately reflect the definition provided in the *Regulations Establishing Standards for Accrediting Public Schools in Virginia*, 8VAC20-131-5.

The *Regulations Governing Secondary School Transcripts* were accepted for final review under consent agenda at the March 19, 2020, meeting and submitted pursuant to the Administrative Process Act. The Governor's office completed its review on July 22, 2021. The regulations were placed on Town Hall for public comment on September 13, 2021, and closed on November 12, 2021. There were six public comment submissions through Town Hall. Four comments expressed support for the change of making test scores on transcripts an "Opt-in" instead of Opt-out." One comment expressed concern that section [8VAC20-160-60](#), Elements for Weighting, was not included in the revision proposal. It was communicated to the constituent that the section was not added because there were no proposed changes being considered. The last comment expressed concern about [8VAC20-160-50](#), Weight of advanced-level courses, and the proposed change of the language from "shall" to "may" for divisions determining courses and programs to receive weighted credits. The concern was that there would be inconsistencies between the grade point averages of students achieving the same grades in the same courses, but who live in different school divisions. It was communicated to the constituent that inconsistencies already exist between divisions now due to differing policies on weighting courses. Postsecondary institutions have protocol in place to assess advanced-level courses consistently and equitably for student admissions. The proposed change in language will still allow divisions to continue set weighting policy based on the best interest of their students, in particular those students who may not have equitable access to advanced-level courses.

Acronyms and Definitions

Define all acronyms used in this form, and any technical terms that are not also defined in the "Definitions" section of the regulation.

"Board" means the Virginia Board of Education

Statement of Final Agency Action

Provide a statement of the final action taken by the agency including: 1) the date the action was taken; 2) the name of the agency taking the action; and 3) the title of the regulation.

The Board approved the final stage of the *Regulations Governing Secondary School Transcripts* on March 17, 2022.

Mandate and Impetus

List all changes to the information reported on the Agency Background Document submitted for the previous stage regarding the mandate for this regulatory change, and any other impetus that specifically prompted its initiation. If there are no changes to previously reported information, include a specific statement to that effect.

The last comprehensive revision to the *Regulations Governing Secondary School Transcripts* was made by the Board in 2007. Changes in professional practice and postsecondary expectations warrant a revision to align with the needs of our students, parents, and postsecondary stakeholders.

In addition, the need for revisions was necessitated by educator and constituent calls expressing concern with outdated language and programs, as well as the need to clarify how specific transcript elements such as absences, previous schools attended, and course work are listed.

Superintendent's Memorandum [#133-18](#) was released May 21, 2018, to address some of the urgent issues and stated that the revision process for the *Regulations Governing Secondary School Transcripts* would begin in 2019.

Legal Basis

Identify (1) the promulgating agency, and (2) the state and/or federal legal authority for the regulatory change, including the most relevant citations to the Code of Virginia and Acts of Assembly chapter number(s), if applicable. Your citation must include a specific provision, if any, authorizing the promulgating agency to regulate this specific subject or program, as well as a reference to the agency's overall regulatory authority.

The Board's authority to promulgate regulations is found in § [22.1-16](#) of the *Code of Virginia*, which states that "[t]he Board of Education may adopt bylaws for its own government and promulgate such regulations as may be necessary to carry out its powers and duties and the provisions of this title."

Purpose

Explain the need for the regulatory change, including a description of: (1) the rationale or justification, (2) the specific reasons the regulatory change is essential to protect the health, safety or welfare of citizens, and (3) the goals of the regulatory change and the problems it's intended to solve.

Secondary school transcripts are a complete record of a student's coursework, grades, and credits and provide concrete evidence to postsecondary institutions and the workforce of a student's preparation in matriculating, joining the military, or entering the workforce. It is imperative that the *Regulations Governing Secondary School Transcripts* be updated periodically to align with the needs of postsecondary education and the workforce.

Substance

Briefly identify and explain the new substantive provisions, the substantive changes to existing sections, or both. A more detailed discussion is provided in the "Detail of Changes" section below.

In [8VAC20-160-10](#), words and terms that are outdated are revised or deleted and new words or terms are added that align with secondary and postsecondary expectations. For example, the following definition will be deleted because the program no longer exists:

"Commonwealth College Course Collaborative (CCCC) means a set of approved courses taken in high school that fully transfer as core requirements and degree credits at Virginia colleges and universities."

A revision was made to [8VAC20-160-10](#) and is included as a result of BOE feedback from the January 23, 2020 meeting. The definition of "Verified unit of credit" or "verified credit" was changed to accurately reflect the definition provided in the *Regulations Establishing Standards for Accrediting Public Schools in Virginia*, [8VAC20-131-5](#).

Also, the term "secondary" was replaced by the term "high school" in all sections where the term "secondary" was used to describe the student transcript, profile data, or courses.

In [8VAC20-160-20](#), the date that the secondary school transcript regulations shall become effective for students who take secondary courses for credit is changed to 2022-2023.

In [8VAC20-160-30](#), certain required elements for secondary school transcripts are revised or deleted and new elements added to align with secondary and postsecondary expectations. For example, the element below is deleted because the program no longer exists.

"13. Notation of Commonwealth Scholar Designation;"

In [8VAC20-160-40](#), [8VAC20-160-50](#), and [8VAC20-160-60](#) outdated information is deleted, and information added, to meet postsecondary demands.

Other elements include updated language and the deletion of items that are obsolete or no longer needed by postsecondary institutions or agencies.

Issues

Identify the issues associated with the regulatory change, including: 1) the primary advantages and disadvantages to the public, such as individual private citizens or businesses, of implementing the new or amended provisions; 2) the primary advantages and disadvantages to the agency or the Commonwealth; and 3) other pertinent matters of interest to the regulated community, government officials, and the public. If there are no disadvantages to the public or the Commonwealth, include a specific statement to that effect.

The advantages to the public of the revisions to the *Regulations Governing Secondary School Transcripts* are that updated information and language will align with the needs of school divisions, postsecondary institutions, and business and industry to better position students in the Commonwealth to transition successfully to life after high school.

There are no disadvantages to this regulatory action.

Requirements More Restrictive than Federal

List all changes to the information reported on the Agency Background Document submitted for the previous stage regarding any requirement of the regulatory change which is more restrictive than applicable federal requirements. If there are no changes to previously reported information, include a specific statement to that effect.

There are no applicable federal requirements.

Agencies, Localities, and Other Entities Particularly Affected

List all changes to the information reported on the Agency Background Document submitted for the previous stage regarding any other state agencies, localities, or other entities that are particularly affected by the regulatory change. If there are no changes to previously reported information, include a specific statement to that effect.

Other State Agencies Particularly Affected

There are no other state agencies that are “particularly affected” by this regulatory action.

Localities Particularly Affected

Local education agencies will be affected insofar as changes to transcript elements will require changes to local systems that produce transcripts. This will be a one-time change, and it is anticipated that any financial impact can be absorbed within existing resources.

Other Entities Particularly Affected

There are no other entities that are “particularly affected” by this regulatory action.

Public Comment

Summarize all comments received during the public comment period following the publication of the previous stage, and provide the agency response. Include all comments submitted: including those received on Town Hall, in a public hearing, or submitted directly to the agency. If no comment was received, enter a specific statement to that effect.

Commenter	Comment	Agency response
Matthew Savage	<p>Advanced Course Weighting:</p> <p>I'm concerned with some of the proposed changes to 8VAC20-160-50 "Weight of advanced-level courses," specifically, striking the word "shall" with "may." By removing the requirement that school divisions include weighted grading for IB/AP</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School Transcripts</i> (8VAC20-160-10, et. seq). Your input is important to us as the Board of</p>

	<p>courses, there would be inconsistencies between the grade point averages of students achieving the same grades in the same courses, but who merely live in different school districts. I don't understand the intention of the Board with this change, but I support the rest of the revisions.</p>	<p>Education (BOE) continues through the regulatory process.</p> <p>Inconsistencies already exist between divisions now due to differing policies on weighting courses. Postsecondary institutions have protocols in place to assess advanced-level courses consistently and equitably for student admissions. The proposed change in language will still allow divisions to continue to set weighting policy based on the best interest of their students, in particular those students who may not have equitable access to advanced-level courses.</p> <p>Please be assured that your feedback is being closely considered. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>
<p>Liz Parker</p>	<p>8 VAC 20-160-60. Elements for weighting:</p> <p>I do not see where Elements for Weighting is included in the revision proposal, although it is currently part of transcript regulations. Does this mean that there are no proposed revisions to this section and that it will remain as is, or is it being proposed that this section is no longer included in transcript regulations? This section provides valuable direction for local school divisions that results in some form of consistency for the weighting of courses, and I would recommend that this section remain. Thank you!</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School Transcripts</i> (8VAC20-160-10, et. seq).</p> <p>Section 8 VAC 20-160-60. <i>Elements for weighting</i> was not added because there were no changes to that section. It will remain as-is with no changes as we move forward. If you have further questions please let me know.</p> <p>Your input is important to us as the Board of Education (BOE) continues through the regulatory process. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>
<p>Janet K. Smith</p>	<p>Support of proposed revision regarding SAT/ACT score opt in:</p> <p>I am in full support of the proposed revision regarding the inclusion of SAT/ACT test scores on a student</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School</i></p>

	<p>transcript, changing the policy from an opt-out to an opt-in.</p>	<p><i>Transcripts</i> (8VAC20-160-10, et. seq). Your input is important to us as the Board of Education (BOE) continues through the regulatory process. Please be assured that your feedback is being closely considered. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>
<p>Charlie Williams</p>	<p>In favor of SAT/ACT Opt-In:</p> <p>I write to support the proposed change to status of standardized test scores on student transcripts to opt-in. From observations working with students and transcripts in a school building, it would clearly be to their benefit to approve this change.</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School Transcripts</i> (8VAC20-160-10, et. seq). Your input is important to us as the Board of Education (BOE) continues through the regulatory process. Please be assured that your feedback is being closely considered. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>
<p>Morgan Meadows</p>	<p>Opt in for Test Scores:</p> <p>As a high school counselor, I am fully in support of making test scores on transcripts be an opt IN. Many universities are continuing their test optional policy and students (and counselors!) are required to go through extra steps to NOT report scores to schools, creating more work for everyone. Students should have easy control over what information is sent to colleges. There is no advantage to including scores on transcripts as it is unofficial anyway - colleges who require official scores will not accept transcript scores. Colleges who accept unofficial scores will ask students to self report in the application. Scores are not automatically updated after each</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School Transcripts</i> (8VAC20-160-10, et. seq). Your input is important to us as the Board of Education (BOE) continues through the regulatory process. Please be assured that your feedback is being closely considered. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>

	test and therefore often not accurate for students' most recent test, which can then be contradictory to what students self report. Making test scores opt IN is the best route for everyone.	
Susie Good	<p>Opt in for test scores:</p> <p>I write to support the proposed change to the status of Standardized Test Scores to opt-in. I believe this change would benefit the students that I work with</p>	<p>Dear Virginia Constituent,</p> <p>Thank you for providing public comment during the 9/13/21-11/12/21 window to address the revision to the <i>Regulations Governing Secondary School Transcripts</i> (8VAC20-160-10, et. seq). Your input is important to us as the Board of Education (BOE) continues through the regulatory process. Please be assured that your feedback is being closely considered. If we need clarification or have follow up questions regarding your public comment submission we will contact you via email. It is anticipated that the regulations will go before the BOE at the January 27, 2022 meeting for final review.</p>

Detail of Changes Made Since the Previous Stage

*List all changes made to the text since the previous stage was published in the Virginia Register of Regulations and the rationale for the changes. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. Explain the new requirements and what they mean rather than merely quoting the text of the regulation. * Put an asterisk next to any substantive changes.*

Current chapter-section number	New chapter-section number, if applicable	New requirement from previous stage	Updated new requirement since previous stage	Change, intent, rationale, and likely impact of updated requirements
8VAC20-160-10			<p>The addition of the term “high school course” that replaces the term “secondary course.” The definition will stay the same.</p> <p>The addition of the term “high school profile data” that replaces the term “secondary school</p>	<p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with the SOA.</p> <p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and</p>

			<p>profile data.” The definition will stay the same.</p> <p>The addition of the term “high school transcript” that replaces the term “secondary school transcript.” The definition will stay the same.</p>	<p>postsecondary institutions, as well as align with the SOA.</p> <p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with the SOA.</p>
8VAC20-160-20			<p>Deleted the term “secondary” and replaced with the term “high.”</p> <p>The effective date changed to 2022-2023.</p>	<p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with the SOA.</p> <p>The effective date is changed to align with anticipated approval of the regulations.</p>
8VAC20-160-30			<p>Deleted the term “secondary” in the opening paragraph of the section and replaced with the term “high.”</p>	<p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with the SOA.</p>
8VAC20-160-40			<p>Deleted the term “secondary” in the opening paragraph of the section and replaced with the term “high.”</p>	<p>Replacing the term “secondary” with the term “high school” will provide clarity and consistency to school divisions and postsecondary institutions, as well as align with the SOA.</p>

Detail of All Changes Proposed in this Regulatory Action

List all changes proposed in this action and the rationale for the changes. For example, describe the intent of the language and the expected impact. Describe the difference between existing requirement(s) and/or agency practice(s) and what is being proposed in this regulatory change. Explain the new requirements and what they mean rather than merely quoting the text of the regulation. * Put an asterisk next to any substantive changes.

Current chapter-section number	New chapter-section number, if applicable	Current requirements in VAC	Change, intent, rationale, and likely impact of updated requirements
8VAC20-160-10		This section includes definitions for these regulations.	<p>Definition of “Accelerated course” has been deleted.</p> <p>Definition of “Advanced-level courses/programs” has been revised to remove language not needed.</p> <p>Definition of “Advanced Placement (AP) course” has been revised for clarity.</p> <p>Definition of “Certificate of Program Completion award date” has been revised to add clarity and a reference to the applicable regulatory section of the SOA.</p> <p>Definition of “Commonwealth College Course Collaborative” has been deleted as it is no longer available.</p> <p>Definition of “Commonwealth Scholar” has been deleted, as it is no longer available.</p> <p>Definition of “Credit” has been deleted in favor of adding definitions for both a “Standard Credit” and “Verified unit of credit.”</p> <p>Definition of “Credit summary” has been revised.</p> <p>Definition of “Curriculum” has been deleted and replaced with the definition of “Curricular Program.”</p> <p>Definition of “Dual enrollment course” has been revised for clarity.</p>

			<p>Definition of “Honors course” has been revised to update language.</p> <p>Definition of “Secondary course” has been revised by removing language not needed.</p> <p>Definition of “Secondary school profile data” has been revised to remove language not needed.</p> <p>Added definition of “Standard credit” or “standard credit” with language from the revised SOA.</p> <p>Added definition of “Verified unit of credit” or “verified credit” with language from the revised SOA.</p>
<p>8VAC20 -160-20</p>		<p>This section includes the effective date for the change to the regulations for students who take secondary courses.</p>	<p>Effective date changed to 2022-2023.</p>
<p>8VAC20 -160-30</p>		<p>This section describes the format options for secondary school transcripts.</p>	<p>Revision was made to the language in the opening paragraph to encourage the use by divisions of using XML as the digital data exchange method for electronic transcript transmission.</p> <p>Requirement for “Gender” was deleted. Secondary and postsecondary partners stated that this information is gathered in other ways and not needed on the official transcript.</p> <p>Revision was made to change “Home address” to “Primary address.”</p> <p>Revision was made to change “Home telephone number” to “Primary phone number.”</p> <p>Revision to the language of “Type of diploma” for clarity.</p> <p>Language added to include “High School Equivalency” to the information included on the transcript if no diploma has been awarded.</p> <p>Language added to include completion of First Aid, Cardiopulmonary</p>

			<p>Resuscitation (CPR), and Automated External Defibrillator (AED) to transcripts to align with requirements in 8VAC20-131-51.</p> <p>Requirement for “Notation of Commonwealth Scholar Designation” deleted as it is no longer available.</p> <p>Language added to clarify that information provided on the transcript for contact information for schools where high school credits were earned be the name of the school “at the time” the credits were earned. This revision is directly related to constituent feedback.</p> <p>Language added to clarify that days absent on the transcript reflect only those for years in which the student was taking courses for high school credit. This revision is directly related to constituent feedback.</p> <p>Language added to clarify that all courses, to include repeated courses, are to be on the transcript, except those purged from the middle school record in accordance with 8VAC20-131-90.</p> <p>Language added to “credits to date” to specify both standard and verified credits.</p> <p>Language added to specify “overall standard credit summary” needed on the transcript.</p> <p>Revision made to change the language for the transcript to include the standardized testing record from an “Opt-Out” to an “Opt-In.” The transcript will now NOT include scores such as SAT/ACT unless the student or parent elect to have it added, per the division policy (Opt-In). This revision is a result of stakeholder feedback.</p> <p>Language added to allow for signature and title of school official to be</p>
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			<p>transmitted through a secure and verified electronic method.</p> <p>Language added to allow for the date of the official signature to be transmitted through a secure and verified electronic method.</p> <p>Language added to include “College Entrance Examination Board” to clarify the acronym “CEEB.”</p>
8VAC20-160-40		This section describes information that must be contained on the school profile data sheet sent with transcripts.	<p>Language revised to “curricular program” to align with revision in 8VAC20-160-10.</p> <p>Required information “Grade distribution” was deleted. Secondary and postsecondary partners agreed that this is not needed.</p> <p>Language “if applicable” added for schools sending an explanation and computation for weighting grades.</p>
8VAC20-160-50		This section describes courses that shall be weighted by school divisions.	<p>Language was revised to change Advanced Placement and International Baccalaureate to “Advanced-level” and to change “shall” to “may.” A statement was also added for divisions to consider the impact of weighting courses on equitable access to advanced-level courses.</p>