

NOTICE OF INTENT
Board of Elementary and Secondary Education

(CXV.Chapter 33)

Under the authority granted in R.S. 17:6 and in accordance with R.S. 49:950 et seq., the Administrative Procedure Act, notice is hereby given that the Board of Elementary and Secondary Education proposes to amend *Bulletin 741—Louisiana Handbook for School Administrators*. The proposed amendments update terminology and requirements for home study programs.

Title 28
EDUCATION

Part XI. Accountability/Testing

Part CXV. Bulletin 741—Louisiana Handbook for School Administrators

Chapter 33. Home Study Programs

§3301. Definition

Home Study Program—a program that offers a sustained curriculum of quality, at least equal to that offered by public schools at the same grade level, and implemented under the direction and control of a parent, legal guardian, or tutor.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 45:

§3305. Application Process

A. Initial Home Study Program Application

1. An initial application must be made within 15 days after the beginning of the program to the LDE, on behalf of BESE, for review and approval.

2. The initial application will be accompanied by a certified copy or a photocopy of the birth certificate of the student. The applicant must certify that the home study program will offer a sustained curriculum of quality at least equal to that offered by public schools at the same grade level.

3. For purposes of compulsory attendance, a child participating in an approved home study program will be considered in attendance in a day school.

B. Home Study Program Application Renewal

1. A renewal application must be made October 1 of the school year, or within 12 months of the approval of the initial application, whichever is later. Parents seeking continued approval are required to submit a renewal application each year.

2. A renewal application will be approved if the applicant submits to the LDE satisfactory evidence that the program offers a sustained curriculum of quality at least equal to that of public schools at the same grade level.

C. Initial and renewal applications will be approved if found to meet the requirements set forth in R.S. 17:236.1. Upon LDE approval, parents will receive an official approval verification letter. Because state law does not provide for any exceptions for the deadline for the approval of a home study program and does not allow for retroactive approval of a previous school year, it is the parent's responsibility to maintain a record of annual home study participation.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 39:2229 (August 2013), LR 45:

§3307. Instructor

A. A parent, legal guardian, or tutor will be permitted to provide instruction in a home study program.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 45:

§3309. Curriculum

A. - A.4. ...

B. A high school diploma awarded by a home study program approved by LDE, on behalf of BESE, is deemed by all public postsecondary education institutions, state departments, agencies, boards, commissions, and other state and local governmental entities to have the same rights and privileges afforded to a high school diploma awarded by a state-approved nonpublic school.

C. Repealed.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 37:1137 (April 2011), LR 39:2229 (August 2013), LR 42:1879 (November 2016), LR 45:

§3311. Testing

A. A parent or court-appointed custodian of a student in a home study program may request of the LEA superintendent or the state superintendent that the student be administered the LEAP tests in grades 3-8 under the following conditions:

1. - 5. ...

B. Students enrolled in state-approved home study programs are not eligible to participate in LEAP connect, ELPT, or EOC tests.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 37:1138 (April 2011), LR 45:

§3313. Admission or Readmission to the Public School System

A. ...

1. The policy includes a placement exam to determine grade-level placement .
2. Repealed.

B. - B.3. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.2.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 39:2230 (August 2013), LR 45:

§3315. Due Process

A. No public school will deny admission or readmission of a home study program student if that student is otherwise eligible for enrollment in a public school pursuant to state law, the policies of the local school board, and the Board of Elementary and Secondary Education.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 45:

§3317. Cost

A. All costs directly attributed to the home study program will be borne by the parent or court appointed custodian approved to offer such program.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 39:2230 (August 2013), LR 45:

COMPARISON DOCUMENT

Title 28 EDUCATION

Part CXV. Bulletin 741—Louisiana Handbook for School Administrators

Chapter 33. Home Study Programs

§3301. Definition

~~A. A home study plan for the purposes of these policies is *Home Study Program*—a program in which an approved curriculum that offers a sustained curriculum of quality, at least equal to that offered by public schools at the same grade level, and can be implemented under the direction and control of a parent, legal guardian, or a tutor (i.e., court-appointed guardian under Louisiana law).~~

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 45:

§3305. Application Process

A. Initial Home Study Program Application

1. An initial application must be made within 15 days after the beginning of the program to the LDE, on behalf of BESE, for review and ~~recommendation to BESE~~ approval.

2. The initial application ~~shall~~ will be accompanied by a certified copy or a photocopy of the birth certificate of the ~~child~~ student. ~~The applicant must certify that the home study program will offer a sustained curriculum of quality at least equal to that offered by public schools at the same grade level.~~

3. ~~For purposes of compulsory attendance, a child participating in an approved home study program will be considered in attendance in a day school.~~

B. Renewal Home Study Program Application Renewal

1. A renewal application must be made ~~by the first of October 1~~ of the school year, or within 12 months of the approval of the initial application, whichever is later. ~~Parents seeking continued approval are required to submit a renewal application each year.~~

2. A renewal application ~~shall~~ will be approved if the ~~parents-applicant~~ submits to BESE the LDE satisfactory evidence that the program ~~offered~~ a sustained curriculum of a quality at least equal to that of public schools at the same grade level.

C. ~~Initial and renewal applications shall~~ will be approved ~~at the discretion of BESE~~ if found to meet the requirements set forth in R.S. 17:236.1. ~~Upon LDE approval, parents will receive an official approval verification letter. Because state law does not provide for any exceptions for the deadline for the approval of a home study program and does not allow for retroactive approval of a previous school year, it is the parent's responsibility to maintain a record of annual home study participation.~~

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 39:2229 (August 2013), LR 45:

§3307. Instructor

A. A parent, legal guardian, or tutor (i.e., court-appointed guardian under Louisiana law) ~~may~~ will be permitted to provide instruction in a home study ~~plan~~ program.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 45:

§3309. Curriculum

A. - A.4. ...

B. ~~In order to receive a Louisiana State equivalency diploma, the student must pass the *HiSET*[®] exam. Completion of a home study program does not entitle the student to a regular high school diploma. A high school diploma awarded by a home study program approved by LDE, on behalf of BESE, is deemed by all public postsecondary education institutions, state departments, agencies, boards, commissions, and other state and local governmental entities to have the same rights and privileges afforded to a high school diploma awarded by a state-approved nonpublic school.~~

C. ~~A high school diploma awarded by a home study program approved by BESE shall be deemed by all public postsecondary education institutions, all state departments, agencies, boards, and commissions, and all other state and local governmental entities to have all the rights and privileges afforded to a high school diploma awarded by a state-approved nonpublic school. Repealed.~~

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1312 (June 2005), amended LR 37:1137 (April 2011), LR 39:2229 (August 2013), LR 42:1879 (November 2016), LR 45:

§3311. Testing

A. A parent or court-appointed custodian of a ~~child~~ student in a home study program may request of the LEA superintendent or the state superintendent, that the ~~child~~ student be administered the LEAP, ~~LEAP~~, or GEE tests in grades 3-8 under the following conditions:

1. - 5. ...

B. Students enrolled in state-approved home study programs are not eligible to participate in LAA-1, LAA-2, ELDA LEAP connect, ELPT, or EOC tests.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 37:1138 (April 2011), LR 45:

§3313. Admission or Readmission to the Public School System

A. ...

1. ~~The policy shall provide for the screening and evaluation of such students and shall include examinations a placement exam to determine the grade-level placement at which students should be admitted.~~

2. ~~The policy shall include the administration of the Louisiana Educational Assessment Program tests for the grades offered or required by BESE. Refer to the guidelines for nonpublic and home schooled students transferring to the public school systems, participation in the LEAP. Repealed.~~

B. - B.3. ...

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.2.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 39:2230 (August 2013), LR 45:

§3315. Due Process

A. ~~The due process procedures for resolution of disagreements at the local level pertaining to the application and reauthorization of the home study plan shall follow the procedures established by BESE. No public school will deny admission or readmission of a home study program student if that student is otherwise eligible for enrollment in a public school pursuant to state law, the policies of the local school board, and the Board of Elementary and Secondary Education.~~

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 45:

§3317. Cost

A. All costs directly attributed to the home study program ~~shall~~ will be borne by the parents or court appointed custodian approved to offer such program.

AUTHORITY NOTE: Promulgated in accordance with R.S. 17:6 and 17:236.1.

HISTORICAL NOTE: Promulgated by the Board of Elementary and Secondary Education, LR 31:1313 (June 2005), amended LR 39:2230 (August 2013), LR 45:

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION
FAMILY IMPACT STATEMENT
(LA R.S. 49:953 and 972)

Person Preparing Statement: Ryan Gremillion
Phone: 225-342-1501
Division: Policy Office
Rule Title: LAC 28: Part CXV

In accordance with Section 953 and 974 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a Family Impact Statement on the rule proposed for adoption, repeal or amendment. All Family Impact Statements shall be kept on file in the State Board Office which has adopted, amended, or repealed a rule in accordance with the applicable provisions of the law relating to public records.

PLEASE RESPOND TO THE FOLLOWING:

1. WILL THE PROPOSED RULE AFFECT THE STABILITY OF THE FAMILY?
 No
 Yes
 Lacks sufficient information to determine
2. WILL THE PROPOSED RULE AFFECT THE AUTHORITY AND RIGHTS OF PARENTS REGARDING THE EDUCATION AND SUPERVISION OF THEIR CHILDREN?
 No
 Yes
 Lacks sufficient information to determine.
3. WILL THE PROPOSED RULE AFFECT THE FUNCTIONING OF THE FAMILY?
 No
 Yes
 Lacks sufficient information to determine
4. WILL THE PROPOSED RULE AFFECT FAMILY EARNINGS AND FAMILY BUDGET?
 No
 Yes
 Lacks sufficient information to determine
5. WILL THE PROPOSED RULE AFFECT THE BEHAVIOR AND PERSONAL RESPONSIBILITY OF CHILDREN?
 No
 Yes
 Lacks sufficient information to determine
6. IS THE FAMILY OR A LOCAL GOVERNMENT ABLE TO PERFORM THE FUNCTION AS CONTAINED IN THE PROPOSED RULE?
 No
 Yes
 Lacks sufficient information to determine

Signature of Contact Person: Ryan Gremillion
Date Submitted: November 5, 2018

STATE BOARD OF ELEMENTARY AND SECONDARY EDUCATION
POVERTY IMPACT STATEMENT
(LA R.S. 49:973)

Person Preparing Statement: Ryan Gremillion

Phone: 225-342-1501

Division: Policy Office

Rule Title: LAC 28: Parts XI, CXLIX, and CXV

In accordance with Section 973 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a Poverty Impact Statement on the rule proposed for adoption, amendment, or repeal. All Poverty Impact Statements shall be in writing and kept on file in the state agency which has adopted, amended, or repealed a rule in accordance with the applicable provisions of the law relating to public records. For the purposes of this Section, the word "poverty" means living at or below one hundred percent of the federal poverty line.

PLEASE RESPOND TO THE FOLLOWING:

1. WILL THE PROPOSED RULE AFFECT THE HOUSEHOLD INCOME, ASSETS, AND FINANCIAL SECURITY?

- No
 Yes
 Lacks sufficient information to determine

2. WILL THE PROPOSED RULE AFFECT EARLY CHILDHOOD DEVELOPMENT AND PRESCHOOL THROUGH POSTSECONDARY EDUCATION DEVELOPMENT?

- No
 Yes
 Lacks sufficient information to determine

3. WILL THE PROPOSED RULE AFFECT EMPLOYMENT AND WORKFORCE DEVELOPMENT?

- No
 Yes
 Lacks sufficient information to determine

4. WILL THE PROPOSED RULE AFFECT TAXES AND TAX CREDITS?

- No
 Yes
 Lacks sufficient information to determine

5. WILL THE PROPOSED RULE AFFECT CHILD AND DEPENDENT CARE, HOUSING, HEALTH CARE, NUTRITION, TRANSPORTATION, AND UTILITIES ASSISTANCE?

- No
 Yes
 Lacks sufficient information to determine

Signature of Contact Person: Ryan Gremillion

Date Submitted: November 5, 2013

Small Business Statement

The impact of the proposed Rule on small businesses as defined in the Regulatory Flexibility Act has been considered. It is estimated that the proposed action is not expected to have a significant adverse impact on small businesses. The agency, consistent with health, safety, environmental and economic welfare factors has considered and, where possible, utilized regulatory methods in the drafting of the proposed rule that will accomplish the objectives of applicable statutes while minimizing the adverse impact of the proposed rule on small businesses.

Provider Impact Statement

The proposed Rule should not have any known or foreseeable impact on providers as defined by HCR 170 of 2014 Regular Legislative Session. In particular, there should be no known or foreseeable effect on:

1. the effect on the staffing level requirements or qualifications required to provide the same level of service;
2. the total direct and indirect effect on the cost to the providers to provide the same level of service; or
3. the overall effect on the ability of the provider to provide the same level of service.

Public Comments

Interested persons may submit written comments via the U.S. Mail until noon, December 9, 2018, to Shan N. Davis, Executive Director, Board of Elementary and Secondary Education, Box 94064, Capitol Station, Baton Rouge, LA 70804-9064. Written comments may also be hand delivered to Shan Davis, Executive Director, Board of Elementary and Secondary Education, Suite 5-190, 1201 North Third Street, Baton Rouge, LA 70802 and must be date stamped by the BESE office on the date received. Public comments must be dated and include the original signature of the person submitting the comments.

Shan N. Davis
Executive Director

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

Person
Preparing
Statement: Ryan Gremillion Dept.: LA Department of Education
Board of Elementary &
Secondary Education

Phone: (225) 342-1501 Office: Policy

Return
Address: P. O. Box 94064 Rule
Baton Rouge, LA Title: LAC 28: Part CXV

Date Rule
Takes Effect: Upon final promulgation

SUMMARY

In accordance with Section 953 of Title 49 of the Louisiana Revised Statutes, there is hereby submitted a fiscal and economic impact statement on the rule proposed for adoption, repeal or amendment. THE FOLLOWING STATEMENTS SUMMARIZE ATTACHED WORKSHEETS, I THROUGH IV AND WILL BE PUBLISHED IN THE LOUISIANA REGISTER WITH THE PROPOSED AGENCY RULE.

I. ESTIMATED IMPLEMENTATION COSTS (SAVINGS) TO STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

There are no implementation costs to the Department of Education or local school districts as a result of the proposed changes to guidelines for home study programs which clarify the application process for approval of home study programs, eliminate testing requirements, and include other technical changes for alignment with state law.

II. ESTIMATED EFFECT ON REVENUE COLLECTIONS OF STATE OR LOCAL GOVERNMENTAL UNITS
(Summary)

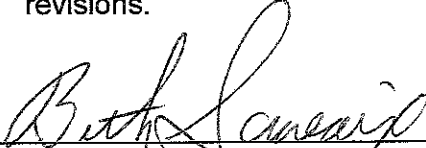
There are no estimated impacts on revenue collections as a result of the proposed policy revisions.

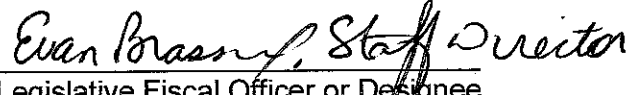
III. ESTIMATED COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS (Summary)

Students completing home study programs will no longer be required to pass, and parents will no longer be required to pay for the cost of the HiSET exam in order for a student to receive a state equivalency diploma.

IV. ESTIMATED EFFECT ON COMPETITION AND EMPLOYMENT (Summary)


There are no estimated effects on competition and employment as a result of the proposed revisions.


Signature of Agency Head or Designee


Legislative Fiscal Officer or Designee

Beth Scioneaux, Deputy Superintendent for Management and Finance
Typed Name and Title of Agency Head or Designee


Date of Signature


Date of Signature

FISCAL AND ECONOMIC IMPACT STATEMENT
FOR ADMINISTRATIVE RULES

The following information is required in order to assist the Legislative Fiscal Office in its review of the fiscal and economic impact statement and to assist the appropriate legislative oversight subcommittee in its deliberation on the proposed rule.

- A. Provide a brief summary of the content of the rule (if proposed for adoption, or repeal) or a brief summary of the change in the rule (if proposed for amendment). Attach a copy of the notice of intent and a copy of the rule proposed for initial adoption or repeal (or, in the case of a rule change, copies of both the current and proposed rules with amended portions indicated).

State law (R.S. 17:236.1) sets forth the process by which the Louisiana Department of Education (LDE) on behalf of the Board of Elementary and Secondary Education (BESE) approves home study program applications received from parents and legal guardians of school-aged children.

In 2005, BESE promulgated rules pursuant to the law in Bulletin 741, *Louisiana Handbook for School Administrators*. In response to requests from two state organizations representing parents with approved home study programs, the LDE recommends revisions to Bulletin 741 to more closely align the regulations with state law.

- B. Summarize the circumstances that require this action. If the Action is required by federal regulation, attach a copy of the applicable regulation.

State law (R.S. 17:236.1) sets forth the process by which the Louisiana Department of Education (LDE) on behalf of the Board of Elementary and Secondary Education (BESE) approves home study program applications received from parents and legal guardians of school-aged children.

In 2005, BESE promulgated rules pursuant to the law in Bulletin 741, *Louisiana Handbook for School Administrators*. In response to requests from two state organizations representing parents with approved home study programs, the LDE recommends revisions to Bulletin 741 to more closely align the regulations with state law.

- C. Compliance with Act 11 of the 1986 First Extraordinary Session.

1. Will the proposed rule change result in any increase in the expenditure of funds? If so, specify amount and source of funding.

No

2. If the answer to (1) above is yes, has the Legislature specifically appropriated the funds necessary for the associated expenditure increase?

(a) _____ Yes. If yes, attach documentation.

(b) _____ NO. If no, provide justification as to why this rule change should be published at this time.

WORKSHEET

I. A. COSTS OR SAVINGS TO STATE AGENCIES RESULTING FROM THE ACTION PROPOSED

1. What is the anticipated increase (decrease) in costs to implement the proposed action?

COSTS	FY18-19	FY19-20	FY20-21
PERSONAL SERVICES			
OPERATING EXPENSES	-0-	-0-	-0-
PROFESSIONAL SERVICES			
OTHER CHARGES			
EQUIPMENT			
<u>MAJOR REPAIR & CONSTR.</u>			
<u>POSITIONS (#)</u>			
TOTAL	-0-	-0-	-0-

2. Provide a narrative explanation of the costs or savings shown in "A. 1.", including the increase or reduction in workload or additional paperwork (number of new forms, additional documentation, etc.) anticipated as a result of the implementation of the proposed action. Describe all data, assumptions, and methods used in calculating these costs.

3. Sources of funding for implementing the proposed rule or rule change.

SOURCE	FY18-19	FY19-20	FY20-21
STATE GENERAL FUND	-0-	-0-	-0-
AGENCY SELF-GENERATED	-0-	-0-	-0-
DEDICATED			
FEDERAL FUNDS	-0-	-0-	-0-
OTHER (Specify)			
TOTAL	-0-	-0-	-0-

4. Does your agency currently have sufficient funds to implement the proposed action? If not, how and when do you anticipate obtaining such funds?

Yes.

B. COST OR SAVINGS TO LOCAL GOVERNMENTAL UNITS RESULTING FROM THE ACTION PROPOSED

1. Provide an estimate of the anticipated impact of the proposed action on local governmental units, including adjustments in workload and paperwork requirements. Describe all data, assumptions and methods used in calculating this impact.

The proposed revisions will not have any impact on local governmental units.

2. Indicate the sources of funding of the local governmental unit that will be affected by these costs or savings.

No sources of funding of the local governmental unit will be affected by the proposed revisions.

FISCAL AND ECONOMIC IMPACT STATEMENT
WORKSHEET

II. EFFECT ON REVENUE COLLECTIONS OF STATE AND LOCAL GOVERNMENTAL UNITS

A. What increase (decrease) in revenues can be anticipated from the proposed action?

The proposed revisions will not impact revenue collections of state and local governmental units.

REVENUE INCREASE/DECREASE	FY18-19	FY19-20	FY20-21
STATE GENERAL FUND	-0-	-0-	-0-
AGENCY SELF GENERATED			
RESTRICTED FUNDS*			
FEDERAL FUNDS			
LOCAL FUNDS			
TOTAL	-0-	-0-	-0-

*Specify the particular fund being impacted.

B. Provide a narrative explanation of each increase or decrease in revenues shown in "A." Describe all data, assumptions, and methods used in calculating these increases or decreases.

See above.

FISCAL AND ECONOMIC IMPACT STATEMENT

WORKSHEET

III. COSTS AND/OR ECONOMIC BENEFITS TO DIRECTLY AFFECTED PERSONS OR NON-GOVERNMENTAL GROUPS

- A. What persons or non-governmental groups would be directly affected by the proposed action? For each, provide an estimate and a narrative description of any effect on costs, including workload adjustments and additional paperwork (number of new forms, additional documentation, etc.), they may have to incur as a result of the proposed action.

Students completing home study programs will no longer be required to pass, and parents will no longer be required to pay for the cost of the HiSET exam in order for a student to receive a state equivalency diploma. The fee for the first subtest is \$26; additional retests within a 12-month period are \$16. Effective January 2019, the cost of each subtest will increase.

- B. Also provide an estimate and a narrative description of any impact on receipts and/or income resulting from this rule or rule change to these groups.

No impact on income is anticipated as a result of this rule change.

IV. EFFECTS ON COMPETITION AND EMPLOYMENT

Identify and provide estimates of the impact of the proposed action on competition and employment in the public and private sectors. Include a summary of any data, assumptions and methods used in making these estimates.

The proposed revisions will not have an impact on competition and employment.