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**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING STANDARDS FOR ACCREDITATION OF ARKANSAS PUBLIC
SCHOOLS AND PUBLIC SCHOOL DISTRICTS
PUBLIC COMMENTS AND RESPONSES**

FIRST ROUND OF PUBLIC COMMENT

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 3.053.04: Due to the new 3.04 and the elimination of the original 3.04, this should continue to be 3.05.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 3.063.05: Due to the new 3.04 and the elimination of the original 3.04, this should continue to be 3.06.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 3.073.06: Due to the new 3.04 and the elimination of the original 3.04, this should continue to be 3.07.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 3.083.07: Due to the new 3.04 and the elimination of the original 3.04, this should continue to be 3.08.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Association, 7/15/24

Comments: 9.03.2: I would recommend changing “at the cost of the public school district” to instead be “with the cost of the professional development to be covered by the public school district”. As written, it makes it sound like the professional development is going to be harmful to the district rather than the district being responsible for the monetary amount of the PD.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 1-B.1: We have received numerous inquiries from districts over the years about trying to adopt a process for providing the student handbooks through an electronic process in order to reduce costs by not having to print the handbooks in order to be able to pass them out to students. I believe that a simple change to this Standard would make it clear that this would be an acceptable process and would recommend amending it to be something along the lines of “that they have either received a physical copy of the school’s discipline policies or the direct location where an electronic copy of the school’s discipline policies may be accessed”.

Division Response: **Comment considered. No changes made. The rule as written would allow school districts to provide student discipline policies electronically, and the Division can provide guidance via Commissioner’s Memo.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 1-C.2.7: In accordance with Act 654 of 2023, this should read “Division approved high school computer science or computer science-related career and technical education course”.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: Standard 2: There is a comma missing between “career” and “and”.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association,

7/15/24

Comments: 3-B.1: There is an unnecessary “s” at the end of “improvement” at “School improvements plans should”.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 4-E.3: I believe that the word “district” should be retained at “Each public school district shall” as the school counseling program, including the school counselor to student ratio, is established at the district level and would make it clearer as to why this is a district-level probationary violation rather than a school-level one.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 7/15/24

Comments: 5-A.1: For consistency with other changes in the Rules, “in accordance with the laws of the State of Arkansas and the rules of the Division” should be changed to “pursuant to Arkansas law or Division Rule”.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Arkansas Public School Resource Center, 7/12/24

Comments: Sections 10.01.2.1 and 10.01.2.2, Page 8: What is the rationale for reducing the presentation time limits from twenty (20) to fifteen (15) minutes?

Division Response: **Comment considered. No changes made. This change aligns with language changes in other division rules.**

Commenter Name: Arkansas Public School Resource Center, 7/12/24

Comments: Section 1-A.1.3.9, Page 11: Does this mean three (3) programs of study with one (1) being from the H2 list?

Division Response: **Comment considered. No changes made. The list of approved programs of study referenced in this Standard will be posted on the division website.**

Commenter Name: Arkansas Public School Resource Center, 7/12/24

Comments: Section 2-K.2, Page 16: Is this one (1) of the H2 completer paths?

Division Response: **Comment considered. No changes made. The list of approved career-ready pathways referenced in this Standard will be posted on the division website.**

Commenter Name: Arkansas Public School Resource Center, 7/12/24

Comments: Section 4-C.1, Page 20: Where does the authority come from to add the requirement for a dean of students position? This term/position does not appear in Title 6. of the Arkansas Code, nor is it defined in the Rules.

Division Response: **Comment considered. No changes made. This language was included simply to add terminology that school districts or open-enrollment public charter schools may already use.**

Commenter Name: Arkansas Public School Resource Center, 7/12/24

Comments: Section 4-E.3, Page 21: The current language should stay in place, as it tracks the language of Ark. Code Ann. § 6-18-2004(a).

Division Response: **Comment considered. A nonsubstantive change was made.**

SECOND ROUND OF PUBLIC COMMENT

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3.04: I would recommend making this a 3.01 instead so the definitions are in alphabetical order.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: ~~3.05~~3.04: With the new definition added above, this should remain at 3.05 along with the following subsections.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: ~~3.06~~3.05: With the new definition added above, this should remain at 3.06 along with the following subsections

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: ~~3.07~~3.06: With the new definition added above, this should remain at 3.07.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: ~~3.08~~3.07: With the new definition added above, this should remain at 3.07.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 5.01: “Accredited-cited” should be changed to “cited” to align with the change in the definition at 3.01.

Division Response: **Comment considered. No changes made. The rule as amended already reflects this change.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 7.04.5: “Division” should be “Division of Elementary and Secondary Education” to align with the other uses in the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards

Association, 9/20/24

Comments: 9.01: “Division” should be “Division of Elementary and Secondary Education” in two places here to align with the other uses in the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.1.2.9: “Division” should be “Division of Elementary and Secondary Education” ito align with the rest of the Rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.1.3: “State Board of Education” should be changed to “State Board” to align with the rest of the Rules. “Division” should be “Division of Elementary and Secondary Education” ito align with the rest of the Rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.1.3.9: The parenthetical Arabic numeral is missing from between “three” and “units”.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.1.3.10: “Division” should be “Division of Elementary and Secondary Education” ito align with the rest of the Rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.2: The “Ark. Code Ann.” Is not appearing to be struck.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.4: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.5: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.6: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-A.7: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified**

complies with Code of Arkansas Rules style.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-B.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-C.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 1-C.2: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-A.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-C.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-E.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-F.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-F.2: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-G.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-H.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 2-J.2: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-A.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-A.4: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-A.6: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-A.7: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-B.2: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: Comment considered. A nonsubstantive change was made.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-C.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: Comment considered. A nonsubstantive change was made.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 3-C.2: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-A: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: Comment considered. A nonsubstantive change was made.

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-B.2: “Division” should be “Division of Elementary and Secondary Education” in

two places here to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-C.2: “Division” should be “Division of Elementary and Secondary Education” in two places here to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-D.2: “Division” should be “Division of Elementary and Secondary Education” in two places here to align with the rest of the rules.

Division Response: **Comment considered. No changes made. The language identified complies with Code of Arkansas Rules style.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-E.1: “Division” should be “Division of Elementary and Secondary Education” in two places here to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-F.1: “Division” should be “Division of Elementary and Secondary Education” in two places here to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 4-G.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 5-A.1: “Division” should be “Division of Elementary and Secondary Education” to align with the rest of the rules.

Division Response: **Comment considered. A nonsubstantive change was made.**

Commenter Name: Lucas Harder, Policy Services Director, Arkansas School Boards Association, 9/20/24

Comments: 6-A.2: As there are two different divisions referenced in the Rules, this should probably designate if it is the Division of Elementary and Secondary Education or the Division of Public School Academic Facilities and Transportation.

Division Response: **Comment considered. A nonsubstantive change was made.**