DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES GOVERNING GRADING AND COURSE CREDIT PUBLIC COMMENTS

ROUND 1 OF PUBLIC COMMENTS

Commenter Name and Organization: Denise Airola; University of Arkansas

Comments:

To Whom It May Concern, I am writing in regard to the proposed rules for grading and course credit. Specifically, I am pleased to see the continued offering of Credit by Demonstrated Mastery (CDM).

My concern is with 6 CAR § 96-301(a)(2) Weighted credit is not available for CDM.

> I infer from this that CDM could not apply to accelerated courses. However, CDM is a very appropriate way to accelerate a student--whether that is accelerating a student through a regular graduation credit course or a course that would qualify for weighted credit. This would enable students to take additional and/or more advanced coursework.
>
> For some accelerated students, the time component of a course is demotivating, especially for gifted students who are not geared toward over-achieving, rather more inclined to under-achieve. Further, demonstrating mastery at a rigorous level in an advanced course often involves preparing for and demonstrating many of the skills that students will need following high school such as self-directed learning, persistence through productive struggle, and other important durable skills.
>
> The proposed rules require DESE approval for CDM which would ensure an advanced or weighted course CDM plan was sufficient to satisfy approval for weighted credit.
> I suggest striking the language from the proposed rule to allow schools and districts to have flexibility in meeting students' individual needs for acceleration--including CDM.

Division Response: Comment considered, no changes were made. The comment proposes policy which has not been adopted by the division at this time

Commenter Name and Organization: Dustin Seaton

Comments:

To Whom It May Concern: I apologize for missing the June 8th, 2026, public meeting, but hope this email finds you well. As a stakeholder in public education, the rules governing grading and course credit have some possible need for clarity, revision, and/or extended thoughts.

1 - Concern: The definition of rigor is AP/IB-centric.

The rules heavily emphasize AP and IB while providing limited statewide recognition for other rigorous programs, such as Cambridge International, industry credentials, early college pathways, and/or honors acceleration. The Rogers Public School District just expanded our accelerated learning opportunities (thanks to ACCESS Act 2025) to include the Cambridge International Education A.I.C.E. diploma.

2 - Concern: There are limited incentives for early postsecondary readiness.

The proposed rules reward course enrollment but provide few incentives for outcomes, such as Associate degrees, industry certifications, diplomas of merit and/or distinction, or successful AP/IB/Cambridge scores. Schools receive little direct reward for successful completion compared to simple participation.

3 - Concern: Equity & Equality:

How do we ensure students from different school districts compete for scholarships or other opportunities when using different weighting systems? More importantly, some schools offer accelerated courses for weighted FTE in the 8th grade while others cannot until 9th-grade grade (pg. 6). Simply taking a required high school course such as PE or Health in the 8th-grade should not necessarily grant the 5.0 weighted GPA credit. This incentivizes high-flying middle schoolers to take as many high school credit-bearing courses in middle school, and vice-versa for college-bearing credit in HS despite not every MS or HS having the same opportunities or courses. (pg. 12) What is the difference between an 8th-grade PE or Health class given 5.0 status and the exact same one taught in 9th-grade but for 4.0 credit?

4 - Concern: No Statewide outcome funding model.

Funding from these proposes rules remains largely enrollment-driven rather than outcome-driven. Schools are not rewarded for college credit earned, industry credentials obtained, associate degrees, or other postsecondary enrollment. Florida's acceleration funding model offers a strong example for how to address this.

5 - Concern: Braindrain risk remains unaddressed.

The rules encourage college readiness but contain no mechanism to encourage graduates to remain in Arkansas after earning credentials. The state subsidizes advanced learning yet lacks incentives, such as stay scholarships, workforce retention grants, rural service commitments, and/or an Arkansas Promise-style program. This is increasingly important given Arkansas workforce shortages and out-migration of high-achieving graduates to other top colleges/universities.

Division Response: The following responses are provided:

1. Comment considered, no changes made. These rules do not include a definition of "rigor." These rules do not emphasize any vendor over another. The proposed amendment to the rule represents an expansion weighted credit opportunities making the effect of the rule consistent with the concern of the commentor.

2. Comment considered, no changes made. This comment proposes policy which has not been adopted by the division at this time.

3. Comment considered, no changes made. The rules make clear that general courses will fall on the 4.0 scale while a 5.0 scale and 6.0 scale are available for students that take accelerated learning coursework that meets the course requirements. The Course Code Management System will identify the level of weight to be awarded for courses. This applies to all schools in Arkansas and should not vary.

   Further, even beyond accelerated learning or these rules, students can earn Diplomas with Merit or Distinction which are factors considered for eligibility for the Governor's Scholars Program. Many opportunities exist for Arkansas students regardless of their location in this state. The purpose of these rules is to ensure clarity surrounding accelerated learning.

4. Comment considered, no changes made. This comment regarding enrollment driven versus outcome driven funding is something to be considered in future policy decisions.

5. Comment considered, no changes made. This comment regarding no mechanism to encourage graduates to remain in Arkansas upon earning credentials is something beyond the scope of rulemaking.

Commenter Name: Lucas Harder, ARSBA

Comments:

1. 101(5)(C) "location" should be changed to "located".

2. 101(9): I would recommend adding an additional (d) covering that dual enrollment courses are not eligible for weighted credit to align with the accelerated learning guidance and to prevent any additional confusion. This could be added to (17) as an alternative.

3. 101(16): The "and" in "one hundred and twenty" here is unnecessary since "and" in this context would technically indicate a decimal place.

4. 101(17): As (15)(B) specifically states that a concurrent credit course can get weighted credit if everything is done correctly, I would recommend adding language here to distinguish that dual enrollment is not eligible for weighted credit to prevent confusion in that regard especially since it is not specifically stated later.

5. 101(20)(C)(ii): The phrase "taken prior to grade nineth" should either be "taken prior to grade nine" or "taken prior to the ninth (9th) grade".

6. 503(c)(3): The citation for a public school to transport a private school or home school student is A.C.A. § 6-18-232(f)(1) rather than 6-18-203.

7. 702(2): The word "Elementary" is missing the "en".

Division Response: The following responses are provided:

1. Change made consistent with the comment; however, this is now reflected in the definition under 101(21)(C).

2. Comment considered and no changes were made pursuant to this comment. A dual enrollment courses may receive weighted credit if the course meets the definition of an accelerated course by "being a substantively similar course or program approved by the division."

3. A change was made consistent with the comment.

4. Comment considered and no changes were made pursuant to this comment. A dual enrollment courses may receive weighted credit if the course meets the definition of an accelerated course by "being a substantively similar course or program approved by the division."

5. A change was made consistent with the comment.

6. A change made consistent with the comment.

7. A change was made consistent with the comment.

Commenter Name: Tripp Walter, APSRC

Comments:

1. Page 23, 6 CAR §96-503, Section (c)(3): Correct statutory citation from "Arkansas Code §6-18-203" to "Arkansas Code §6-18-232(f)".

2. Page 25, 6 CAR §96-505, Section (a)(1): Ark. Code Ann. §6-18-223(a)(2) states that "a student who enrolls in and successfully completes a dual enrollment course . . . 'shall' be entitled to receive both high school and college grades and credit." The language in the rule, as written, implies discretionary compliance as the "shall" has been amended to "may." The rule also includes added discretionary language, removing the requirement to grant credit, as imposed by §6-18-223(a)(2).

3. Page 25, 6 CAR §96-505, Section (a)(3): The language of the rule grants schools the discretion to determine whether to grant credit for successful completion of a dual enrollment course. Statutory language does not provide such discretion. (Ark. Code Ann. § 6-18-223(a)(2)).

Division Response:

1. A change was made consistent with the comment.

2. A change was made consistent with the comment. Proposed 6 CAR §96-505(2) was amended to account for the provision of § 6-18-223(a)(2). The new language also clarifies that weight shall only be given if eligible pursuant to these rules. In addition, the definition for "approved institution of higher education" was amended and a separate definition of "institution of higher education" was added to account for the statutory provision and account for the requirement of § 6-18-223(a)(2).

3. A change was made consistent with the comment as described in (2).

Commenter Name: Sherry Reach, Cambridge International

Comments:

6 CAR § 96-101. Definitions.

1. Page 1 – Definitions Please add “Cambridge Pre-Advanced International General Certificate of Secondary Education (IGCSE) program”

2. Page 3 – Definitions (6) Please amend as follows:

   I. (6) “Cambridge Advanced International Certificate of Education (AICE) course” means a course authorized as a Cambridge International Advanced Subsidiary (AS) Level one-year ~~program~~ course and/or a Cambridge International Advanced (A) Level two-year course that allows students at both the AS and A levels an opportunity to take a standardized end of course examination written and graded by Cambridge International that may result in postsecondary-level credit and eligibility for an AICE Diploma award from Cambridge International.;

   II. “Cambridge Pre-Advanced International General Certificate of Secondary Education (Cambridge Pre-Advanced IGCSE ®) course” means a middle school, junior high school, or high school level course developed by Cambridge using learner-centered and enquiry-based approaches to learning. Students are given the opportunity to acquire the knowledge and skills which Cambridge research shows will lead to success in a Cambridge Advanced course, college and careers.

3. Page 6 – Section (20) Please add:

   I. “Cambridge Pre- Advanced (IGCSE®) courses develop learner knowledge, understanding and skills necessary for success at the Advanced Levels.

   II. Page 27 Teacher training Please add: (2) C A Cambridge Pre-Advanced (IGCSE ®) course or Cambridge Advanced International Certificate of Education course;

Division Response: The following responses are provided:

1. Comment considered; however, this term is not used in the rule nor within the “accelerated learning” definition, therefore, it was not added.

2. A change was made consistent with the comment in (I) but for (II), comment considered; however, this term is not used in the rule nor within the “accelerated learning” definition, therefore, it was not added.

3. Comments considered in (I) and (II); however, this term is not used in the rule nor within the “accelerated learning” definition, therefore, it was not added.

Commenter Name and Organization: Debbie Jones; Bentonville Schools

Comments:

Commenting regarding Rules Governing Grading and Course Credit

1. **6 CAR § 96-101. Definitions**

   (4) Requires that Advanced Placement (AP) course "be offered by high schools or course providers that allows (should be allow) student an opportunity to take a standardized examination that may result in postsecondary-level credit," To allow for flexibility, a grade level designation should not be specified. The specificity of a College Board authorized course allows for acceleration in the future.

2. **6 CAR § 96-203. Report cards**

   The report card section of the rules is outdated; the cost of postage prohibits a large school district from mailing all students four times per year. For us, the cost would be $62,400 per year just for postage of report cards. In addition, most families are more attentive to digital mail. In addition, most systems have digital grading systems that allow parents to continually check student grades rather than just 4 times per year.

   (2) Add (D) emailed to parent, guardian, or person standing in loco parentis
   Many high schools are not quarter systems but semesters as our high schools. We recommend deleting (b) The report card shall be provided at the end of each grading period but no fewer than (4) times each school year, or modify to read (b) The report card shall be provided at the end of each grading period.

3. **6 CAR § 96-503. Tuition.**

   This is critical as some parents are attempting to get the entire college degree paid by school districts (Evidence can be provided). Pg. 22 Add on (3)(c)(1) A student who attends a private school or a home school and enrolls in a public school district or open-enrollment public charter school to take a district approved concurrent credit course shall not be charged.

4. **6 CAR § 96-504. Endorsed concurrent enrollment Concurrent credit course requirements**

   Add (c) Approved as a concurrent course by the school district or open-enrollment public charter school where the student is enrolled.

   Thank you for your consideration,

   Debbie Jones

Division Response: The following responses are provided:

1. The typo “allows” in the definition of “Advanced Placement (AP) course” has been changed to “allow.”

Removed the reference to “high school” and replaced with “public schools” to allow for greater flexibility as suggested.

2. The comment suggested a modernization of the report card distribution requirements as it relates to high postage costs. As such, the division amended the requirements to allow schools to now email copies of report cards to families. In addition to emailing the report cards, schools are still required to either mail report cards, send them home with students, or give them to their parents. This allows for flexibility in providing report cards and should help alleviate postage costs.

   Additionally, the comment suggested considering that not all schools are on a quarter system. As such, an amendment was made to allow for report cards to be sent at the end of each grading period but no less than four times per year.

3. Students and their families are not being charged for concurrent credit coursework. Concurrent funding for private school and homeschool students shall be provided through either A2A, EFA monies, or foundation funding where the student is enrolled.

4. Comment considered, no changes made. It is unclear where this comment intended this proposed amendment to go as it does not fit with the draft language. Even still, the language in this section is statutorily mandated as it relates to concurrent instructor requirements.

_____
_____

Commenter Name and Organization: Jennifer Morrow; Bentonville Schools

Comments:

1. **Page 10 - 6 CAR § 96-203 Report Cards**

   The report card shall be provided at the end of each grading period but no fewer than four (4) two (2) times each school year.

   The change recommended here and highlighted in yellow is inclusive of districts that do not have high schools on the quarter system as well as those who do. The proposed language in the 5/29/26 draft only honors those districts using quarters in high schools.

2. **Page 12 - 6 CAR § 96-401 General Provisions**

   The first line "(a)" says "Beginning with the 2025-2026 school year."

Does that mean the 6.0 or 5.0 will be added retroactively to some of our courses completed in the school year that just ended? All prior indications have been that it will not be retroactive.

If some courses will have more weight when taken in middle school/junior high that means that this year the same Pre-AP Alg.I course is getting more weight for the 8th grader (C/O 2031) who is taking it in 8th grade, the same course is in our system for less weight for 10th grader who has it on the transcript but also took it in 8th grade, and the course has less weight for the 9th grader taking it in 9th grade.

3. **Page 19**

(2)(A) This says the secondary public school is "shall coordinate… to ensure" receipt of accommodations related to 504s or IEPs.
When a student takes a class on the college campus or with the college employee as the instructor (or anytime a student enrolls in an IHE) the student has the right not to claim their disability and receive accommodations. The public schools have taken that as FERPA protected information we cannot disclose to the college. Filing a disability can have detrimental impact on a student's educational record when provided to some employers (including military recruitment).

The secondary public school cannot "ensure" this when the classes are taught on the college campus or by the college's employee. In fact, some IHEs in the state tell our secondary public school employees who are instructors for the college classes not to follow the IEP/504 unless the student filed the disability with the IHE's office of disability services. We maintain otherwise in the case that the course is taught by an instructor employed with us (the secondary public school) where the teacher has IEP/504 information in eSchool and cannot "unknow" the need to serve the disability.

Sections (f)(1) and (2)(A) appear to say one thing while (2)(C)(ii) and (iii) appear to contradict the first two. The latter two are in line with what IHEs are requiring of us.

4. **6 CAR § 96-501Concurrent Credit**

Page 15 (a)(3) Some neighboring states do not allow concurrent enrollment in remedial courses with the consideration that students needing remediation should do so in high school coursework and it looks like we are expanding remedial college classes to lower grades.

Page 18 (c)(2) This will allow some students to take concurrent options in grades 9 and 10 in one large district and walk in as the new Valedictorian in another smaller district (or district without a large concurrent offering) in the state.

Division Response: The following responses are provided:

1. The division received another similar comment prompting an amendment to the report card section. The amendment allows for report cards to be sent at the end of each grading period but no less than four times per year.

2. Comment considered, no changes made. There will be no retroactive application of weighted credit. Weight at the 6.0 scale will begin with the 27-28 freshman students graduating in 2031 and students who matriculate ahead of the 27-28 freshman class will not be effected.

3. Comments considered, no changes made. The language of proposed 6 C.A.R. §§ 96-401(f) is drafted in such a way to account for complexity of administering secondary and higher education at the same time. The concerns addressed in these comments can be best addressed though the IEP process.

4. Comment considered, no changes were made as no changes were suggested. Rather, the comment proposes policy which has not been adopted by the division at this time.

ROUND 2 OF PUBLIC COMMENT

Commenter Name and Organization: Jon Laffoon; Farmington School District

Comments:

1. **The proposed 6.0 grading scale could significantly distort GPAs and class rank.**

   Beginning with the graduating class of 2031, an "A" in an eligible weighted course would receive six points, while an "A" in a regular course would remain four points. This two-point difference could make course selection—not overall academic performance—the primary factor in determining class rank, scholarships, and honors. It may also discourage students from taking valuable electives such as fine arts, athletics, or career-focused courses that are not weighted.

2. **The scope of courses eligible for the 6.0 scale is unclear.**

   The rule uses overlapping terms such as "accelerated learning," "accelerated learning course," "honors course," and "weighted credit." It is not sufficiently clear whether the 6.0 scale applies equally to AP, Pre-AP, concurrent credit, honors, Cambridge, IB, CTE, and other approved courses. Districts need a definitive clarification and a statewide course list well before scheduling begins.

3. **Weighting courses taken before ninth grade creates transition and equity concerns.**

   Beginning in 2027–28, required graduation courses taken before ninth grade may receive honors weight. Students in the graduating class of 2031 could take those courses during 2026–27, before the new scale technically takes effect. The rule should clarify whether those grades will be retroactively weighted and how districts should handle students who transfer from schools that offer different early-credit opportunities.

4. **The 6.0 scale may create inequities among districts and students.**

   Larger districts generally offer more AP, concurrent, honors, and specialized courses than smaller districts. Even within a district, scheduling conflicts, prerequisite requirements, staffing limitations, disability-related needs, or participation in extracurricular programs may limit access. A statewide class-rank system should not reward students primarily because their school or schedule provides more weighted opportunities.

5. **The CTE weighting provision is administratively difficult and potentially unfair.**

   Weighted credit would not be awarded until a student completes the entire pathway and earns the associated industry credential. That could require building administrators to

revise several years of transcript grades after the fact. Students who transfer, encounter scheduling conflicts, or cannot access a credential exam could lose weighted credit even though they successfully completed rigorous courses. Credential availability and cost also vary among pathways.

6. **The annual CTE approval timeline does not align with district scheduling.**

   The approved pathway list would be published by January 1, but districts often begin course selection, staffing decisions, and master-schedule development before or shortly after that date. Districts need approved course lists earlier and should be protected from midyear changes that affect promised weighting.

7. **Concurrent-credit costs could become an open-ended local financial obligation.**

   The rule prohibits charging students or parents for tuition, fees, or materials, regardless of completion or performance. It does not establish a clear limit on the number of courses a district must fund or fully explain responsibility for textbooks, online access codes, laboratory materials, transportation, or summer coursework. Districts could be required to cover costs without a corresponding or sufficient appropriation.

8. **The treatment of private-school and home-school students needs clarification.**

   The rule permits their concurrent-credit expenses to be paid through district foundation funding when they enroll for a course. It should clearly explain how funding follows these students, whether the district receives additional revenue, and serving these students creates additional instructional and administrative obligations.

9. **IEP and Section 504 responsibilities are not clearly divided.**

   The rule makes the school district responsible for implementing accommodations or modifications in concurrent-credit courses while allowing the institution of higher education to determine what constitutes a reasonable accommodation. This creates potential conflict and legal exposure when the district and college reach different conclusions. Responsibility for decisions, costs, documentation, and dispute resolution should be expressly assigned.

10. **Student-success-plan requirements may create a substantial administrative burden.**

    Requiring every AP, IB, CTE, concurrent, and other advanced course to be documented in an individual student success plan could demand significant time from principals and counselors without clear evidence that this level of documentation improves student outcomes.

11. **Credit by Demonstrated Mastery may unintentionally penalize advanced students.**

    CDM credit cannot receive weighted credit, even when a student demonstrates mastery of the material comparable to that of an honors or accelerated course. That may discourage participation and disadvantage students in GPA and class-rank calculations. The required local committee and DESE-approved plan also create administrative work that may make districts reluctant to offer the option.

12. **Changes to accelerated-course teacher requirements need clarification.**

    Existing licensure and recurring AP/Pre-AP training language appears to have been replaced by broader requirements tied to institutions of higher education or external accrediting organizations. The rule should clearly state who may serve as the teacher of record, which Arkansas licensure is required, who pays for the required training, and how districts demonstrate compliance.

13. **Districts need adequate implementation time.**

    Course catalogs, board policies, student handbooks, transcript systems, GPA calculations, class-rank policies, counseling procedures, software configurations, and agreements with colleges will all require revision. Final guidance and approved course lists should be issued at least one full scheduling cycle before implementation.

Proposed Two-Paragraph Public Comment

Farmington Schools supports expanding access to rigorous coursework, concurrent credit, career and technical education, and opportunities for students to demonstrate mastery. However, the proposed rules need additional clarity before implementation, particularly regarding the new 6.0 grading scale. A two-point difference between weighted and regular courses could substantially affect GPA, class rank, scholarships, and student course selection. The rules should clearly identify which courses qualify, specify the required high school credits earned before ninth grade, protect transfer students, and ensure that students are not disadvantaged because their school or schedule offers fewer weighted opportunities. The CTE provisions should also be revised so that students receive appropriate credit for completing rigorous coursework without waiting until an entire pathway and industry credential are completed.

The rules may also create significant unfunded and administrative obligations for school districts. Concurrent-credit tuition, fees, materials, summer courses, and services for private-school and home-school students should not become open-ended local expenses without sufficient state funding. In addition, the respective responsibilities of districts and institutions of higher education for IEP and Section 504 accommodations must be clearly defined. We respectfully request a longer implementation period, a definitive statewide

list of weighted courses, clearer transcript and transfer procedures, and greater protection of local districts from costs and principal compliance duties that are not accompanied by adequate funding or clear guidance.

Division Response: The following responses are provided:

1. Comment considered, no changes made. Arkansas Code § 6-15-902 directs the division to promulgate rules for weighted credit given to accelerated learning coursework. Thus, the division has outlined within these rules that criteria. The 6.0 grading scale is intended to encourage acceleration which includes the ability to take concurrent credit coursework. Students may still take classes like fine arts but now they can take it at the college level and receive weighted credit in addition to both high school and college credit. Career focused courses are not excluded from receiving weight as there is a whole section within these rules about weighted credit for career and technical education coursework.

2. The division struck the definition of "accelerated learning course" due to public comments received about it causing confusion. When the rule is implemented, the weight each course will receive will be clearly identified in the Course Code Management System.

3. Comment considered, no changes made. There will be no retroactive application of weighted credit. The 27-28 freshman students graduating in 2031 will only have opportunity to obtain weighted credit during their four years of high school. Future classes will have the opportunity to achieve weighted credit prior to 9th grade.

4. Comment considered, no changes made. While it is true that, due to the nature of the local control of public school districts, some school will likely offer more opportunities than others, the rule will ensure that all students have an opportunity to take accelerated coursework as all schools are required by law to offer a minimum number of these courses. Students are encouraged to take courses available to them and if the school does not offer the course they desire to take, students may consider participation in the course choice program.

5. Comment considered, no changes made. This relates to policy discussion that is beyond the scope of these particular rules.

6. Comment considered, no changes made. This deadline allows the division the opportunity ample time to evaluate career and technical pathways and whether they meet criteria for weight.

7. Comment considered, no changes made. The costs related to concurrent credit are statutorily set and therefore beyond the scope of these rules. It is something that is better considered during legislative session.

8. Comment considered, no changes made. The way in which foundation funding works is described in statute and exceeds the scope of these rules.

9. Comments considered, no changes made. The provisions of this rule related to IEP/504 were drafted in a manner complicit with federal law. It is up to both the district and institution to comply with such laws.

10. Comment considered, no changes made. Arkansas Code § 6-15-2911(b)(2) requires that student success plans, at minimum, address accelerated learning opportunities.

11. Comment considered, no changes made. This is by design, given that course demonstrated mastery (CDM) is not intended to replace the general accelerated pathways local school districts often provide for advanced students. Rather, its purpose is to allow students to earn course credit without taking the course itself if in certain unusual situation where the student demonstrates the required mastery of the course.

12. Comment considered, no changes made. The rules mirror Arkansas Code § 6-16-1203 which outline the requirements.

13. Comment considered, no changes made. These rules cannot address issues of district policy as that exceeds the scope of rulemaking by the division.

Commenter Name and Organization: Katie Stueart; Fayetteville Public Schools

Comments:

Good morning.

I'm an English teacher in Fayetteville Public Schools. I have some comments about the course credit legislation. In my experience working in three different Arkansas public schools, AP courses are more rigorous than concurrent credit. Would it be possible to award AP courses with 6 points while concurrent classes receive 5? I have general concerns about our new weighting system. Which courses will be weighted? I know that there are states that award weight to so many courses that colleges discount these weights when reviewing transcripts. I would hate to see that happen in Arkansas.

Thank you for the opportunity to provide feedback.

Best,
Katie Stueart

Division Response: Comment considered, no changes made. This comment proposes policy which has not been adopted by the division at this time.

Commenter Name and Organization: Cincy Mathis; Fayetteville Public Schools

Comments:

Good afternoon.

I am an English teacher in Fayetteville Public Schools and I have been teaching for 30 years. In my experience as an AP teacher, AP courses provide more rigorous and challenging coursework than concurrent classes. And this leads me to wonder if the new weighted system being proposed is what is best for our students. Would it be possible to change the weighted system and offer 5 points for concurrent courses and the 6 points for AP classes? Colleges will just respond by discounting the weighted grade on student transcript. And this would be really unfortunate for our students that are trying to get into competitive schools and rely on the weighted GPA.

Thank you for the opportunity to provide feedback.

Division Response: Comment considered, no changes made as this comment is beyond the scope of the rules as the comment proposes policy which has not been adopted by the division at this time.

Commenter Name and Organization: Heather Clouse; ASMSA Board of Visitors

Comments:

Good afternoon,

Attached are my public comments regarding the proposed **Rules Governing Grading and Course Credit, 6 CAR pt. 96.**

My comments focus specifically on concurrent-credit eligibility and placement, including the use of Multiple Measures, differences in placement pathways among Arkansas institutions, and opportunities to provide students with a more consistent and holistic process for demonstrating college readiness.

Thank you for the opportunity to provide feedback and for your consideration.
Full Public Comment as Follows:

Thank you for the opportunity to comment on the proposed Rules Governing Grading and Course Credit. My comment concerns 6 CAR § 96-501(a)(2), particularly proposed subsection (B): “Institutions may use a variety of factors and measures beyond a standardized test score when determining proper placement of students in college coursework.”

I support recognizing measures beyond standardized test scores. My concern is one word: “may.” As written, Multiple Measures remains entirely optional. That means Arkansas students

can face very different ways of demonstrating readiness for the same type of concurrent college coursework.

Clarifying Statewide Eligibility

I also encourage the Department to consider whether § 96-501(a)(1) provides sufficient clarity regarding statewide eligibility for concurrent credit. The provision states that students in grades 9–12 "shall be eligible to enroll," but makes that eligibility subject to rules adopted by the individual college or university.

Institutional authority to establish academically justified admission and course-placement standards should be preserved. The concern is that, when § 96-501(a)(1) is read together with § 96-501(a)(2), similarly prepared Arkansas students can face substantially different pathways to demonstrate readiness depending on the institution serving their district.

The issue is not whether every institution should use identical cut scores. It is whether "eligible" should carry a more consistent statewide meaning. A clearer framework could preserve institutional standards while requiring a holistic evaluation process for concurrent credit that gives academically prepared students more than one validated way to demonstrate readiness.

Why This Matters

As Arkansas expands concurrent credit through the ACCESS to Acceleration (A2A) Scholarship Program, consistent and reasonable ways for students to demonstrate academic readiness become increasingly important.

Arkansas Has Already Studied Multiple Measures

ADHE has already studied Multiple Measures Assessment (MMA), including through Arkansas's three-year work with the Center for the Analysis of Postsecondary Readiness. ADHE's 2023 placement guidance calls for multiple viable measures supported by student-success data and recognizes entrance-exam scores alongside other predictors. Arkansas's statewide Concurrent Enrollment Stakeholder Report went further, recommending that Arkansas: "Replace ACT-only eligibility and placement policy with a multiple measures approach." The proposed rule acknowledges this approach, but "may" stops short of making sure students actually have access to a Multiple Measures pathway.

ATLAS Shows Why Greater Alignment Is Needed

Arkansas's transition from ACT Aspire to ATLAS provides a practical example.
The transition from ACT Aspire to ATLAS highlights the alignment issue. Some institutions recognize ATLAS for concurrent placement; others do not. A student may therefore be able to use the State's current assessment as evidence of readiness at one institution, but not another. I am not suggesting that an ATLAS score should automatically establish college readiness, or that every institution should use the same cutoff. Instead, appropriate ATLAS performance should be available as one possible measure when student-success data support its use.

Arkansas Institutions Already Use Different Pathways

The difference is easier to see when the requirements are placed side by side. For Composition I, the University of Arkansas provides several independent ways to demonstrate readiness — test score OR GPA. NWACC requires students to meet the general-education concurrent GPA requirement AND the applicable placement requirements; its ACCUPLACER route requires Writing 260 and Reading 252. Arkansas Tech also uses placement requirements, but its ACCUPLACER baseline is Writing 251 and Reading 251, and it recognizes ATLAS.

Institution	Concurrent eligibility	Composition I: how readiness can be shown	Key difference
University of Arkansas	University of Arkansas offers a test-optional application for admission for students with a 3.20 GPA or higher.	Composition I placement is OR-based: ACT English 19–27 OR SAT EBRW 490–620 OR ACCUPLACER NG Writing 255+ OR CLT 38+ OR high school GPA 3.20+.	Multiple independent pathways. A 3.20 GPA can independently establish Composition I placement.
NWACC	Grades 9–12; 2.50 cumulative HS GPA for general-education/transfer courses AND college-level placement in the applicable subject area.	Student must meet BOTH the general-education concurrent GPA requirement AND the applicable placement requirements. For Composition I, the published ACCUPLACER NG route requires Writing 260+ AND Reading 252+.	The requirements are cumulative rather than OR-based. The published concurrent materials provide a GPA waiver process in certain circumstances, but the placement requirement remains separate. ATLAS is not listed.
Arkansas Tech University	Completed 8th grade; 2.00 cumulative HS GPA; no need for developmental coursework; required school approval. Concurrent, minimum ACT Reading 19.	For Composition I, the published concurrent chart requires Reading 251+ AND Writing 251+ on ACCUPLACER NG. Equivalent ACT scores may be used, and ATLAS ELA 1060+ is accepted.	ATU also uses baseline eligibility plus course-specific placement, but its ACCUPLACER thresholds are 251 Reading / 251 Writing, and it recognizes ATLAS.

The point is not that every institution should use the same cutoff. The concern is that students do not have the same types of pathways available to demonstrate readiness. At the University of Arkansas, a 3.20 high school GPA can independently establish Composition I placement. At NWACC, GPA and placement are separate requirements, and the ACCUPLACER route requires both a 260 Writing score and a 252 Reading score.

A statewide expectation for a holistic evaluation process for concurrent credit would allow institutions to consider more than one validated indicator of college readiness while preserving academically justified placement standards. That framework should include multiple validated placement pathways and an alternative review process for students whose academic preparation is not fully reflected by a single prescribed measure.

National Guidance Supports This Approach

College Board's ACCUPLACER guidance likewise recommends considering multiple factors in placement decisions and states: "No single factor should determine a student's future." If validated indicators beyond a single placement score predict success, Arkansas policy should provide a pathway for that evidence to be considered.

Connection to ACCESS

ACCESS makes consistency in eligibility and placement especially important as concurrent-credit opportunities expand. As concurrent credit expands through ACCESS, a student's path to demonstrating readiness can still vary substantially based on the institution serving the student's district. A statewide Multiple Measures framework would not require every institution to use the same ACT, ACCUPLACER, GPA, or ATLAS score. Nor would it prevent institutions from establishing academically justified course-specific prerequisites. What it would do is establish one common expectation: students should have more than one validated way to demonstrate readiness.

Requested Change to § 96-501(a)(2)(B)

I respectfully request that DESE, in coordination with the Division of Higher Education and the Arkansas Higher Education Coordinating Board, strengthen the proposed language.

Current proposed language: "Institutions may use a variety of factors and measures beyond a standardized test score when determining proper placement of students in college coursework."

Suggested revised language: "Institutions shall provide a multiple-measures pathway for determining proper placement of students in concurrent college coursework. Such measures may include standardized assessments, appropriate ATLAS performance, high school grade point average, successful completion of relevant high school coursework, and other validated indicators demonstrated to predict student success. Nothing in this provision shall prohibit an institution from establishing academically justified course-specific prerequisites."

This change would preserve academic rigor and institutional discretion while giving students more than one reasonable way to demonstrate readiness.

Because the proposed rule itself refers to AHECB placement and concurrent-enrollment policies, I recognize that this may require coordination with higher education. If additional action by ADHE or AHECB is needed, I respectfully ask DESE to refer to the issue for coordinated review. That review should consider:

1. Whether students participating in state-supported concurrent enrollment should have access to a Multiple Measures pathway;

2. Whether appropriate ATLAS performance should be available as one validated measure;
3. Whether current institutional requirements create materially different access for similarly prepared Arkansas students;

4. Whether institutions participating in ACCESS to Acceleration should follow a common minimum Multiple Measures framework while retaining academically justified course requirements; and

5. Whether participation and student-success data should be reviewed by institution and school district to determine whether placement requirements accurately predict success without unnecessarily restricting access.

Alternative Review

The rule should also provide an alternative review process for a student who does not meet a prescribed placement measure but can demonstrate readiness through other validated indicators of student success. Evidence could include high school GPA, successful completion of relevant coursework, appropriate ATLAS performance, other assessments, or additional indicators shown to predict success in college-level coursework. This would not waive an institution's academic standards. It would give students a reasonable opportunity to demonstrate readiness when a single placement measure does not fully reflect their academic preparation.

Conclusion

I support rigorous academic standards for concurrent college courses. My concern is not about lowering standards. It is about making sure Arkansas students have fair, consistent ways to show that they meet them. Arkansas has already done much of the groundwork: ADHE placement guidance, the concurrent-enrollment stakeholder recommendation for Multiple Measures, the transition to ATLAS, and expanding state investment through ACCESS.

So, the issue is not whether institutions should retain academic standards. They should. The issue is whether statewide eligibility has meaningful consistency when the pathway for demonstrating readiness can vary substantially depending on the institution serving a student's district.
It is whether access to Multiple Measures should depend entirely on which institution happens to serve a student's school district. I respectfully believe it should not. Changing "institutions may use" to a requirement that participating institutions provide a Multiple Measures pathway would preserve academic rigor while improving consistency, transparency, and opportunity. It would also better align concurrent credit with the goals of ACCESS—particularly Eligibility and Standardization. Thank you for your consideration.

A. Proposed Rule Language and the Policy Gap

The proposed 6 CAR § 96-501(a)(2)(B) provides: "Institutions may use a variety of factors and measures beyond a standardized test score when determining proper placement of students in college coursework." The issue is narrow: the proposed language recognizes measures beyond a standardized test score but leaves access to those measures optional. As a result, an institution may continue relying primarily on standardized placement scores even when other validated indicators of readiness are available. The requested change is narrow: require institutions to provide students with a

Multiple Measures pathway while preserving institutional authority to establish academically justified placement standards and course-specific prerequisites.

B. Arkansas Division of Higher Education — Multiple Measures

ADHE's placement guidance already identifies multiple measures institutions may evaluate, including:

- Nationally normed entrance examinations;
- Overall high school GPA;
- High school GPA in relevant subject areas;
- High school courses completed;
- Successful completion of transitional coursework;
- Age;
- Motivation or other noncognitive indicators; and
- Other evidence-based factors demonstrated to predict student success.

The guidance also calls for approximately two to four viable data metrics informed by gateway-course outcomes and anticipates entrance-exam scores being considered with other predictors.

ADHE — Placement Policy: https://adhe.edu/institutions/placement-policy

ADHE — Multiple Measures Assessment: https://adhe.edu/institutions/multiple-measures-assessment

ADHE — Arkansas Placement Guidance: https://adhe.edu/File/AR%20Placement_Guidance_2023.pdf

C. Arkansas Concurrent Enrollment Stakeholder Recommendation

The Arkansas Concurrent Enrollment Stakeholder Report specifically recommended: "Replace ACT-only eligibility and placement policy with a multiple measures approach."

The report identified GPA, high school coursework, and other assessments as possible indicators and noted that reliance on a single standardized test can create unnecessary participation barriers.

ADHE — Arkansas Concurrent Enrollment Stakeholder Report: https://adhe.edu/File/Arkansas%20CE%20Report-FINAL- Digital.pdf

D. Arkansas Multiple Measures Research

Arkansas's CAPR Multiple Measures initiative examined placement approaches using information beyond a single standardized test score. NWACC was one of the participating institutions. CAPR reporting identifies GPA, high school coursetaking, and

ACT, SAT, and ACCUPLACER results among the measures considered. NWACC's participation did not require a particular policy.

CAPR — Access to Success: https://ccrc.tc.columbia.edu/publications/access-success-insights-implementing-multiple-measures- assessment.html CAPR — Strategies for

Scaling Multiple Measures Assessment: Lessons from Arkansas: https://ccrc.tc.columbia.edu/publications/strategies-scaling-multiple-measures-lessons-arkansas.html

E. Comparison of Current Arkansas Placement Approaches

Measure / Approach	University of Arkansas	NWACC	Arkansas Tech University
High School GPA	3.20+ GPA is a published pathway for Composition I placement	2.5 GPA required for general-education concurrent enrollment, plus applicable placement requirements	2.0 GPA required for concurrent admission
Composition I / English placement	ACT English 19+, qualifying SAT, ACCUPLACER Writing 255+, CLT 38+, or HS GPA 3.20+	College-level placement score required in applicable subject area	Qualifying ACT, ACCUPLACER, or ATLAS measures accepted
ATLAS	Not listed for Composition I	Not listed among current published concurrent assessment options	Accepted for concurrent placement
ACT Aspire	Not listed for Composition I	Listed among accepted concurrent assessments	Not listed on current chart
What this illustrates	GPA can independently establish placement readiness	Published concurrent pathway is more dependent upon standardized placement scores	Current Arkansas assessment can serve as a placement measure

These examples are not offered to suggest that one institution's exact numerical standards should be imposed upon another. They demonstrate something more fundamental: Arkansas institutions already recognize different types of evidence as valid indicators of college readiness.

F. University of Arkansas — GPA as a Placement Pathway

The University of Arkansas's published Freshman Composition Placement policy provides multiple pathways for direct placement into ENGL 10103 — Composition I. Published qualifying measures include:

- ACT English — 19–27;
- SAT Evidence-Based Reading and Writing — 490–620;
- ACCUPLACER Next-Generation Writing — 255 or higher;
- CLT — 38 or higher; or
- High school GPA — 3.20 or higher.

The key point is not the 3.20 cutoff itself. It is that the University recognizes high school GPA as one valid way to demonstrate readiness for a college-level English course. University of Arkansas — Placement and Proficiency Tests: https://catalog.uark.edu/undergraduatecatalog/enrollmentservices/placementandproficiencytests/

University of Arkansas — High School Dual Enrollment:
https://admissions.uark.edu/apply/high-school.php

G. Northwest Arkansas Community College — Concurrent Requirements

For general education or transfer courses, NWACC currently requires a 2.5 cumulative high school GPA. Students must also demonstrate college-level placement in the applicable subject area through approved standardized assessments.
NWACC's published list currently includes ACCUPLACER Next Generation, ACT, ACT Aspire, SAT, PSAT, and CLT. ATLAS is not included in the published list.
NWACC's published list still includes ACT Aspire but does not list ATLAS. NWACC also participated in Arkansas's Multiple Measures initiative.
NWACC — Concurrent Enrollment Requirements:
https://www.nwacc.edu/enrollment/studentype/enrollmentsteps.html

H. Arkansas Tech University — ATLAS as a Placement Measure

Arkansas Tech's concurrent-placement chart includes ATLAS alongside ACT and ACCUPLACER and recognizes an ATLAS ELA score of 1060 for applicable courses. This does not mean Arkansas Tech's exact score should become a statewide requirement.

It simply shows that ATLAS can be used within a concurrent-placement framework while preserving course-specific academic requirements.

Arkansas Tech University — Concurrent Enrollment Program:
https://www.atu.edu/concurrent/
Arkansas Tech University — 2025–2026 Concurrent Test Score Requirements by

Course: https://www.atu.edu/concurrent/docs/2025-2026%20Concurrent%20Test%20Score%20Requirements%20by%20Course.pdf

I. ATLAS and ACT Aspire

The ACT Aspire-to-ATLAS transition creates a practical concurrent-placement issue. If an institution recognizes ACT Aspire but not ATLAS, current students may not have the same opportunity to use the State's current assessment as evidence of readiness.

The question is whether appropriate ATLAS performance should be available as one validated measure within a Multiple Measures framework.

J. **College Board Guidance on ACCUPLACER**

College Board's ACCUPLACER guidance states: "No single factor should determine a student's future." College Board recommends considering factors such as GPA, other assessments, end-of-course results, and prior learning alongside ACCUPLACER. College

Board — How Multiple Factors Improve Placement Decisions: https://accuplacer.collegeboard.org/educators/make-holistic-placement-decisions

K. What a Statewide Multiple Measures Framework Would — and Would Not — Do

A statewide Multiple Measures requirement would:

- Give students more than one validated way to demonstrate college readiness;
- Allow consideration of GPA, standardized assessments, relevant coursework, ATLAS, and other validated predictors;
- Improve consistency in access to state-supported concurrent coursework;
- Encourage placement standards to be tied to evidence of student success; and
- Better align concurrent-credit implementation with the ACCESS goals of Eligibility and Standardization.

It would not:

- Require identical placement scores at every institution;
- Automatically qualify a student based upon GPA alone;
- Automatically require acceptance of a particular ATLAS score;
- Eliminate course-specific prerequisites;
- Prevent institutions from establishing higher standards when academically justified; or
- Lower the academic expectations of college-level coursework. Standardizing access to a Multiple Measures pathway is not the same as standardizing every institution's academic standards.

L. Requested Policy Language

Current proposed § 96-501(a)(2)(B) "Institutions may use a variety of factors and measures beyond a standardized test score when determining proper placement of students in college coursework."

Requested revision

"Institutions shall provide a multiple-measures pathway for determining proper placement of students in concurrent college coursework. Such measures may include standardized assessments, appropriate ATLAS performance, high school grade point average, successful completion of relevant high school coursework, and other validated indicators demonstrated to predict student success. Nothing in this provision shall prohibit an institution from establishing academically justified course-specific prerequisites."

Central Policy Question

Arkansas has already identified the policy problem, studied Multiple Measures, developed statewide placement guidance, transitioned to ATLAS, and invested state resources in expanding concurrent credit. The remaining question is whether access to alternative ways of demonstrating readiness should continue to depend upon the institution serving a student's school district. I respectfully believe it should not.

M. Northwest Arkansas District Scale and Concurrent Participation - Updated Fall 2025 Data

Fall 2025 NWACC Early College Data

NWACC's Fall 2025 Early College data show a substantial participation difference among four large Northwest Arkansas districts.

District	Fall 2024 HC	Fall 2025 HC	Change	Fall 2025 SSCH
Bentonville	1,167	1,222	+55 (+4.7%)	6,131
Springdale	381	401	+20 (+5.2%)	2,135
Rogers	364	380	+16 (+4.4%)	2,736
Fayetteville	245	209	-36 (-14.7%)	1,076
Four-district total	2,157	2,212	+55 (+2.6%)	12,078

The contrast is hard to miss. In Fall 2025, Bentonville had 1,222 NWACC Early College students; Fayetteville had 209. That is nearly six times as many. Bentonville, Springdale, and Rogers all increased from Fall 2024, while Fayetteville declined by 36 students, or about 14.7%.

The longer trend is worth noting as well. Bentonville grew from 708 Early College students in Fall 2021 to 1,222 in Fall 2025. Fayetteville grew from 141 to 209 over the same period. Across all participating schools, NWACC Early College enrollment increased from 1,905 students to 2,863.

These figures do not prove that placement requirements caused the differences. Course offerings, advising, scheduling, partnership structures, student demand, and other factors also matter. But the size and persistence of the differences make placement policy worth examining as one possible barrier.

If Arkansas gives academically prepared students additional validated ways to demonstrate readiness—through GPA, appropriate ATLAS performance, relevant coursework, or other evidence-based measures—even a modest increase in participation across large Northwest Arkansas districts could mean many more students earning college credit while still in high school.

For that reason, Arkansas should review concurrent participation and student-success data by institution and school district, including the placement method used. The State could then see whether students admitted through different validated measures succeed at comparable rates—and whether particular placement requirements are unnecessarily keeping otherwise qualified students out.

Source: Northwest Arkansas Community College, Fall 2025 Fact Book, Early College Experience, p. 52. https://www.nwacc.edu/_documents/institutionalresearch/factbook.pdf

Requested Change to § 96-501(a)(2)(B)

I respectfully request that DESE, in coordination with the Division of Higher Education and the Arkansas Higher Education Coordinating Board, strengthen the proposed language.

Current proposed language

"Institutions may use a variety of factors and measures beyond a standardized test score when determining proper placement of students in college coursework."

Suggested revised language

"Institutions shall provide a multiple-measures pathway for determining proper placement of students in concurrent college coursework. Such measures may include standardized assessments, appropriate ATLAS performance, high school grade point average, successful completion of relevant high school coursework, and other validated indicators demonstrated to predict student success. Nothing in this provision shall prohibit an institution from establishing academically justified course-specific prerequisites."

This change would preserve academic rigor and institutional discretion while giving students more than one reasonable way to demonstrate readiness.

Division Response: Comment considered, no changes made.

The fundamental concern of this comment is that institutions of higher education have discretion regarding how they determine whether a student is qualified to take a concurrent credit course at the institution.

The Division of Elementary and Secondary Education does not have the authority to regulate institutions of higher education; therefore, the language proposed in the comment is beyond the scope of rulemaking authority granted to the division. The individual districts will have the authority to address these concerns when they reach agreements with the institution to establish their concurrent credit opportunities.

Commenter Name and Organization: Rachel Horn

Comments:

Good afternoon. I have only one comment on the proposed Rules Governing Grading and Course Credit. Thank you!

6. (2)(A) Seems to define "Concurrent Credit," but the definition is attached to "Accelerated learning course." This definition is repeated in (15)(A).

7. *(2)(A) "Accelerated learning course" means college-level courses offered by an approved institution of higher education that, upon completion, would qualify for academic credit in both the institution and the public high school.*

8. *(15)(A) "Concurrent credit course" means a college-level course offered by an institution of higher education in this state that upon completion would qualify for academic credit in both the institution of higher education and a public high school.*

Division Response: Comment considered, a change was made by the division to remove the definition of "accelerated learning course" after receiving multiple public comments related to the confusion of it in relation to the definition of "concurrent credit course."

Commenter Name and Organization: Todd Eric Taylor

Comments:

Dear Division of Elementary and Secondary Education:

I am submitting public comment regarding the proposed revisions to the Rules Governing Grading and Course Credit.

I serve as a practicing school counselor and work directly with students pursuing accelerated learning, concurrent credit, virtual instruction, and competency-based educational opportunities.

I support several important changes in the proposed rules, particularly the broader recognition of accelerated learning and the removal of the grade-level restriction on concurrent credit participation.

At the same time, the proposed rules leave several significant implementation questions unanswered. Unless those issues are resolved, students may be eligible for accelerated opportunities on paper while continuing to face barriers involving funding, course sequencing, testing, transcript credit, grading, and local district interpretation.

1. Removal of the Grade-Level Restriction on Concurrent Credit

I strongly support the proposed removal of the restriction limiting concurrent credit participation to students in grades nine through twelve.

The revised language appropriately allows any eligible student to enroll in a concurrent credit course when the student is admitted by the approved institution of higher education and satisfies the institution's admissions, placement, and course prerequisite requirements.

Academic readiness does not always correspond with a student's age or assigned grade level. Some students demonstrate readiness for high school and college-level coursework well before entering ninth grade. A fixed grade-level restriction can prevent academically prepared students from accessing appropriate instruction even when they meet every requirement established by the participating college or university.

In my own professional experience, I assisted a student who began taking college courses in ninth grade and completed 33 college credit hours during that academic year. The student earned strong grades, ranked first in the class, and was inducted into collegiate honor societies. That student's success demonstrates why readiness—not grade placement—should determine access.

I commend the Division for recognizing that accelerated learning should be based on demonstrated ability rather than an arbitrary grade designation.

However, the heading for the concurrent credit enrollment section still references students in grades nine through twelve. That heading should be revised so that it does not conflict with the operative language or create unnecessary ambiguity.

The final rules should state consistently throughout the document that concurrent credit eligibility is based on institutional admission, placement, prerequisites, and academic readiness, regardless of grade level.

2. ACCESS to Acceleration Rules Must Be Revised to Match

The removal of the grade-level restriction must also be reflected in the rules governing the ACCESS to Acceleration Scholarship Program.

It would be inconsistent to make a student legally eligible to enroll in concurrent credit while retaining a separate grade-level limitation in the state program that funds participation.

Such a conflict would create two categories of academically qualified students:

- Students who qualify for both enrollment and state funding; and
- Younger students who qualify academically but are denied the same funding solely because of grade level.

That result would undermine the purpose of removing the restriction.

The ACCESS to Acceleration rules, guidance documents, application materials, funding procedures, and public information should be revised so that eligibility is based on academic readiness, institutional admission, and course prerequisites rather than grade placement alone.

The final rules should also clarify that a school district may not deny an otherwise qualified student access to concurrent credit solely because the student is below ninth or tenth grade.

3. Accelerated Mathematics Pathways Require Clear Statewide Guidance

The proposed rules open the door to earlier concurrent credit, but they do not clearly explain how districts must develop a workable mathematics pathway after a student accelerates.

For example, a student may complete:

- Algebra I in eighth grade;
- College Algebra in ninth grade; and
- Calculus or another advanced college mathematics course afterward.

The problem is that many district systems remain structured around the traditional sequence of Algebra I, Geometry, Algebra II, and a fourth mathematics course.

A student may successfully complete College Algebra but later be told that the course does not satisfy Algebra II, does not fit the district's prescribed sequence, or may only be recorded as an elective. A student who completes a higher-level mathematics course should not later be forced into a lower-level or substantially duplicative course simply because the college course does not carry the same local title.

The proposed rule states that three college semester hours are equivalent to one high school unit in the same subject area. However, the phrase "same subject area" is too vague to produce consistent statewide decisions.

The final rules or binding implementation guidance should answer the following questions:

- Does College Algebra satisfy Algebra II?
- May College Algebra count as the fourth required mathematics credit?
- May Calculus satisfy an advanced mathematics requirement when the student has not followed the traditional district sequence?
- How should Statistics, Quantitative Reasoning, Trigonometry, and other college mathematics courses be applied?
- Who determines course equivalency: the district, DESE, the institution of higher education, or a statewide equivalency chart?
- May a district require a student to repeat lower-level content already surpassed through successful college coursework?
- How should accelerated mathematics courses be coded on the transcript?
- How should they affect GPA, class rank, graduation requirements, and the student success plan?

The Division should publish a statewide mathematics course-equivalency and acceleration guide that includes sample pathways for students who complete high school mathematics requirements before ninth grade and students who enter college mathematics earlier than the traditional sequence anticipates.

Acceleration must result in forward academic movement. A student should not be accelerated into College Algebra and then required to return to a lower or duplicative mathematics course.

4. Testing Requirements Must Not Block Legitimate Acceleration

The proposed rules also need to address conflicts between accelerated coursework and grade-level state testing requirements.

For example, a student may complete English Composition I and English Composition II at the collegiate level and receive high school English credit. However, because the student remains classified as a tenth grader, the student may still be required to take the tenth-grade ATLAS English Language Arts assessment.

In practice, a district may respond to that conflict by prohibiting future ninth- or tenth-grade students from taking concurrent-credit English courses. That approach penalizes students for accelerating and restricts access to coursework that the proposed rules otherwise authorize.

State testing requirements should not be used as a reason to deny an eligible student an accelerated or concurrent-credit pathway.

The Division should provide clear guidance explaining:

- How students who complete required high school coursework through concurrent credit should be prepared for and administered grade-level assessments;
- Whether a district may deny concurrent credit because a state assessment is tied to the student's grade classification;
- Whether supplemental standards-based support may be provided without requiring the student to repeat an entire traditional course;
- How college coursework satisfies graduation requirements when the state testing structure is based on grade rather than course completion; and
- How schools should reconcile accelerated placement with state and federal testing obligations.

The current system can produce an unreasonable result: the state encourages acceleration, the college admits the student, the student successfully completes college-level work, and the district then restricts future access because the testing structure did not anticipate the student's progress.

The final rules should prevent that outcome.

5. Credit by Demonstrated Mastery Is Too Extensive

I support the principle of Credit by Demonstrated Mastery. Students should not be required to complete coursework they have already mastered merely to accumulate seat time.

However, the proposed process appears unnecessarily extensive and may discourage both districts and families from using it.

Under the proposed rule:

- The district must first submit a Credit by Demonstrated Mastery plan for Division approval;
- The student must complete a Phase 1 examination;
- The student must meet a minimum score before advancing;
- The student must complete at least one additional applied artifact;
- A district committee must review the work;
- The district must establish transcript procedures;
- The district remains subject to Division monitoring;
- Weighted credit is prohibited;
- The process is not intended for whole groups of students; and
- It may not replace general accelerated pathways.

This structure treats demonstrated mastery as an exceptional waiver rather than a practical method of advancement.

A student who has already demonstrated mastery through a college course, college placement examination, state assessment, end-of-course examination, advanced coursework, or another rigorous measure should not automatically be required to complete another examination, an additional artifact, and a committee review.

The process also depends on the district having an approved plan. A student's opportunity should not disappear simply because the district has not completed the administrative process necessary to offer Credit by Demonstrated Mastery.

The proposal further states that CDM should not replace general accelerated pathways, yet it does not clearly require districts to provide those pathways. This creates a serious gap. A district could fail to offer an appropriate accelerated course sequence while also maintaining a lengthy or inaccessible mastery process.

Students could therefore become trapped between two systems:

- The regular course sequence is inappropriate because the student has already mastered the content; and
- The mastery process is too burdensome, delayed, or unavailable.

The final rules should streamline Credit by Demonstrated Mastery and establish minimum statewide protections, including:

1. A clear timeline for responding to a student or parent request;
2. A clear timeline for completing assessments and committee review;
3. Statewide standards for acceptable assessments and minimum passing scores;
4. Recognition of prior college coursework and recognized placement examinations as evidence of mastery;
5. Recognition of state assessments and other validated examinations when appropriate;
6. Authority to waive the artifact requirement when mastery has already been conclusively demonstrated;
7. A written explanation when credit is denied;
8. A defined appeal process;
9. Procedures for students in districts that do not have an approved CDM plan;
10. Protection against requiring students to repeat content already mastered; and
11. Consideration of weighted credit when a student demonstrates mastery of content equivalent to an approved honors or accelerated course.

Credit by Demonstrated Mastery should be a meaningful student opportunity, not a process so extensive that districts avoid offering it and families are discouraged from pursuing it.

6. Fully Asynchronous Digital Learning Requires Clear Rules

The proposed rules do not establish a clear framework for fully asynchronous digital learning courses offered through approved providers.

The rules reference online-based and technology-based instruction, but they do not define asynchronous instruction or explain how a fully asynchronous course should operate when no live teacher provides daily instruction.

This is not a theoretical concern. Districts increasingly use approved digital learning providers whose courses function much like structured correspondence courses. The platform contains the curriculum, lessons, assignments, assessments, pacing tools, grading functions, and student support resources. A local staff member may monitor progress and provide interventions without delivering the subject-matter instruction.

The final rules should distinguish among:

- Traditional classroom instruction;
- Live virtual instruction;
- Teacher-led online instruction; and
- Fully asynchronous, provider-developed digital instruction.

The rules should clarify:

- Whether a separately assigned subject-certified teacher of record is required when instruction is embedded within an approved digital platform;
- Whether the approved provider may serve as the instructional entity responsible for course delivery;

- Who is responsible for verifying and awarding grades;
- What qualifications are required for local personnel who monitor progress but do not teach the content;
- How instructional-time and seat-time requirements apply to self-paced courses;
- How teacher licensure requirements apply when there is no live instructor;
- How accreditation requirements apply;
- What responsibilities remain with the district;
- How accommodations, modifications, interventions, and student support are provided;
- How course quality and academic integrity are monitored;
- How courses are coded in the Course Code Management System; and
- How students and courses are reported in the state student-information system.

Without statewide clarification, districts may treat the same state-approved course differently.

One district may recognize the approved provider's instructional structure. Another may require a locally assigned subject-certified teacher even though that teacher is not delivering the instruction. A third may refuse to award credit because the course does not fit a traditional teacher-of-record model.

That inconsistency creates unnecessary staffing costs, compliance concerns, and unequal student access.

Approved asynchronous learning should not be forced into a regulatory structure designed exclusively for traditional classroom instruction or live virtual teaching. The rules should establish a workable framework that reflects how asynchronous courses actually operate while preserving accountability, progress monitoring, student support, accommodations, and academic integrity.

7. Meaningful Statewide School Counselor Input Is Needed

I am also concerned that rules affecting student placement, graduation planning, accelerated learning, course credit, testing, student success plans, and college access appear to be developed without sufficient formal input from practicing school counselors.

School counselors are responsible for interpreting these rules for students and families and turning state policy into workable individual academic plans. Counselors are often the first professionals to identify conflicts involving graduation requirements, course sequences, state testing, college admissions, concurrent enrollment, funding eligibility, transcripts, GPA calculations, and local scheduling practices.

Counselor input should not be limited to employees of the Division or individuals selected informally for occasional consultation. Division-employed counselors may provide valuable expertise, but they do not represent the full range of conditions encountered by counselors working directly in Arkansas schools.

The experiences of counselors serving urban districts, rural districts, border communities, alternative learning environments, virtual programs, charter schools, and small districts with limited course offerings may differ substantially.

The concerns identified in this comment illustrate why practicing counselor input is essential. Counselors are expected to determine:

- How College Algebra should be applied to a student's mathematics pathway;
- What course should follow when a student completes high school mathematics early;
- How concurrent English credit interacts with grade-level ATLAS testing;
- Whether a younger student may access and fund concurrent credit;
- How demonstrated mastery should be documented;
- How an asynchronous course should be recorded when there is no traditional classroom teacher;
- How credits transfer between districts;
- How weighted credit affects GPA and class rank; and
- How all of these decisions should be reflected in the student success plan.

These are not merely administrative questions. They determine whether a student receives the correct credit, graduates on time, remains eligible for scholarships, accesses an appropriately challenging course, or is unnecessarily required to repeat mastered material.

I recommend that Arkansas establish a permanent Statewide School Counselor Advisory Board to review proposed education rules, guidance documents, implementation manuals, course-credit policies, graduation requirements, testing policies, and student-information procedures before they are finalized.

The board should include practicing school counselors representing:

- Elementary, middle, junior high, and high school levels;
- Urban, suburban, rural, and geographically isolated districts;
- Alternative learning environments and virtual programs;
- Open-enrollment public charter schools;
- Large and small school districts;
- Border communities whose students may access nearby out-of-state institutions;
- Concurrent-credit and accelerated-learning programs; and
- Students with disabilities, students at risk of not graduating, and students pursuing highly accelerated pathways.

A majority of the board should consist of practicing school counselors currently employed in schools rather than Division employees or central-office administrators.

The board should be given sufficient time to review proposed rules, submit written recommendations, identify conflicts with existing policies, and explain the likely effects on student advising and implementation. Its recommendations and the Division's responses should be included in the public rulemaking record.

Arkansas should not continue adopting rules that school counselors are expected to implement without ensuring that practicing counselors have a meaningful role in reviewing those rules.

8. Student Success Plans Must Be Functional

The proposal requires accelerated coursework to be reflected in a student success plan. I support that requirement, but the plan must be more than a recordkeeping document.

For an accelerated student, the plan should identify:

- Courses already completed or mastered;
- Remaining graduation requirements;
- The next appropriate course in each subject;
- College admissions and course prerequisites;
- State testing requirements;
- How each course will be recorded;
- How each course will satisfy graduation requirements;
- How weighted credit will be applied;
- How ACCESS to Acceleration funding will be used;
- Anticipated conflicts between high school and college requirements; and
- The long-term sequence necessary to prevent the student from running out of appropriate coursework.

A student success plan should be based on the student's demonstrated academic level, not merely the student's age or grade classification.

9. The Six-Point Weighted Scale Requires Further Clarification

The proposed six-point weighted scale is a major change and requires additional implementation guidance.

Beginning with the anticipated graduating class of 2031, an A in an eligible weighted course would receive six points. However, the rules do not fully explain:

- Which courses will receive six-point weighting;
- Whether all accelerated courses will receive the same weight;
- How concurrent credit courses will be classified;
- How one-semester college courses will be compared with yearlong AP or honors courses;
- How transfer grades will be converted;
- How class rank will be calculated;
- How mixed grading scales will be managed;
- How courses completed before ninth grade will affect GPA;
- How colleges and universities will interpret the transcript; and
- Whether a student taking a more rigorous college course could receive less weight than a student taking a locally designated honors course.

The Course Code Management System and the Accelerated Learning Guide will apparently play a major role in these decisions. Those materials should be published for public review before the rules are finalized.

Fundamental eligibility, GPA, and class-rank protections should be included in the rule itself rather than left entirely to a guidance document that may later be changed outside the formal rulemaking process.

Courses Completed Before Ninth Grade

I also support the recognition of graduation-credit courses completed before ninth grade. However, the final rules should provide clear transcript and graduation guidance.

They should explain:

- Whether the course must appear on the high school transcript;
- Whether the course satisfies the graduation requirement;
- Whether the grade is included in the high school GPA;
- Whether weighted credit applies;
- How the course affects class rank;
- Whether the student must complete an additional course in the same subject;
- Whether the credit and weight transfer to another district; and
- Whether the student may proceed directly to the next appropriate course.

Without this clarification, a student may receive nominal credit while still being required to complete four additional years of coursework in the same subject. That would defeat the purpose of acceleration.

10. Need for Consistency Across Rules, Funding, Guidance, and District Practice

The central concern throughout these proposed changes is consistency.

The grading and course-credit rules cannot remove grade barriers while ACCESS to Acceleration rules retain them.

Concurrent-credit rules cannot authorize advanced college coursework while graduation policies force students back into lower-level courses.

Accelerated learning rules cannot encourage early completion while testing requirements cause districts to prohibit the very courses that made acceleration possible.

Credit by Demonstrated Mastery cannot be presented as an opportunity while being so procedurally extensive that students cannot realistically use it.

Asynchronous digital courses cannot be approved at the state level while districts remain uncertain whether they may award credit without assigning a teacher who does not actually deliver the instruction.

The final rules should establish a coherent statewide system in which:

- Eligibility is based on readiness;
- Funding follows eligibility;
- Credit is applied consistently;
- Students are not required to repeat mastered content;
- Testing requirements do not block acceleration;
- Digital instructional models are clearly recognized;
- Districts receive practical implementation procedures;
- Practicing school counselors have a formal role in policy review; and
- Students can continue moving forward through an appropriate academic pathway.

I commend the Division for broadening accelerated learning and removing the outdated grade-level restriction on concurrent credit. These are important and meaningful steps.

I respectfully request that the Division retain those improvements while revising the final rules to address the implementation gaps described above. The goal should not merely be to permit acceleration on paper. The rules should ensure that academically prepared students can access, fund, complete, record, and continue through accelerated coursework without encountering unnecessary local barriers.

Thank you for considering these comments.

Division Response: The following responses are provided:

1. The heading of the title addressed by the comment was changed to "Enrollment guidelines" already and does not require further amendment.

2. Comment considered, no changes made. The comment recommends modifying another rule in a manor inconsistent with current statutory law. Consequently, no changes have been made to the current proposal based on this comment.

3. Comment considered, no changes made. Some of the concerns of this comment will be clarified by the agreements between the school district and the institutions of higher education issuing college credit. This flexibility is appropriate given the nature of concurrent credit however guidance will be available to school districts in the *Policy, Accommodations, and Testing Handbook*. The comment related to testing requirements proposes policy which has not been adopted by the division at this time.

4. Comment considered, no changes made. The comment related to CDM proposes policy which has not been adopted by the division at this time.

5. Comment considered, no changes made. The division is currently in the process of promulgating Rules Governing Distance and Digital Learning. These comments will be taken into consideration as the division continues with the drafting of these rules.

6. Comment considered, no changes made. Counselors have the opportunity to provide input during the public comment period during rule promulgation, as has been done here. Beyond that, the comment proposes policy which has not been adopted by the division at this time.

7. Comment considered, no changes made. The comment related to student success plans proposes policy which has not been adopted by the division at this time.

8. Comment considered, no changes made. As the division implements the new grading scales it will continue to provide further guidance to asset the schools in this process.

9. Comment considered, no changes made. The comment proposes policy which has not been adopted by the division at this time.

10. Comment considered, no changes made. The comment proposes policy which has not been adopted by the division at this time.

_____

_____

Commenter Name and Organization: Mark Wagner

Comments:

Reading through the Draft Amendment I did have some questions and some confusion.

Firstly, I was unsure what the 6.0 grading scale applied to. Did it apply to all weighted credits going forward or only specific one?

Secondly, is every High School Course that is taken before the 9th grade automatically weighted? Several of the schools in our county - including us - are moving to a HS PE credit in the 8th grade. Does that mean that they will get a weighted grade for that? It seems unfair for a student who gets an A in PE - which is not hard to do - would have the same GPA lift as a student who gets an A in Algebra 1 - which is significantly more challenging.

This also means that if all of our students get a weighted PE credit in 8th that it impacts transfers. If any of our students transfer out to a school that isn't doing that, they will automatically jump up in the ranking. And vice versa, any student transferring in who didn't have that weighted opportunity will suddenly drop in the rankings.

Thirdly, I feel like there is a different level of challenge, rigor, and responsibility between taking a course early (like 8th grade Algebra 1) and taking an advanced course (like AP, College, or IB). This draft makes it look like everything is equal, which seems unfair.

Mark A. Wagner
9-12 High School Principal

Division Response: Comment considered, no changes made. The weight applied to individual courses will be clearly identified in the Course Code Management System. As stated in these rules, there will be the 4.0 Uniform Grading Scale that is applied to general coursework. Then there are the 5.0 and 6.0 grading scales available to eligible accelerated learning and honors coursework. Additionally, the other topics discussed are beyond the scope of rulemaking as the comment proposes policy which has not been adopted by the division at this time.

ROUND 3 PUBLIC COMMENTS

Commenter Name and Organization: Cassie Swofford; Berryville High School

Comments:

Good afternoon.

I had a comment/question on page 13 of the draft of the revised Rules Governing Grading and Course Credit. When it listed the weighted points beginning with the 2027/2028 school year, it lists a D still being worth 2 points. Was this an error since the scale starts at 6 for an A?

I just wanted to verify it shouldn't list D 60-69 = 3.

Thank you for your time.

Division Response: Comment considered, no changes made. This was intentional.

Commenter Name and Organization (if applicable): Dustin Seaton

Comments:

To Whom It May Concern:

After reviewing the latest pending rules page regarding DESE Rule Governing Grading and Course Credit for public comment, here are my public comments from a practitioner:

- There needs to be an incentive for students, teachers, schools, and/or the district for passing an appropriate college-credit assessment (AP/Cambridge/IB exams, earning industry certificate, etc.).

- There needs to be a common college-credit requirement for all Arkansas colleges/universities to recognize and award college credit for passing the appropriate exams for each tested content.

- As a practitioner, we often see accelerated learning teachers move in and out. It would be helpful to not limit the accelerated learning equipment grants to one-time use. Sometimes teachers have varying needs year-to-year. The limitation of a one-time grant hand-cuffs our teachers in providing the necessary supplies/materials needed to be successful. It's also a challenge to document who has and who hasn't received those grants over the years, especially if they have changed subject or content areas or may be teaching more than one accelerated learning course.

- There needs to be equitable recognition of AP, Cambridge, IB, and concurrent credit, particularly as AR expands its accelerated learning opportunities.

- We need a consistent statewide approach to weighted GPA, including clarity on the 5.0 scale, possible 6.0 local scales, and student protections during implementation.

- Let's remove the barriers to acceleration and advanced course offerings, esp. at the middle school level around HS credit, demonstrated mastery, and recognition of multiple rigorous academic pathways.

- There need to be common obligations of the post-secondary institution regarding 504s and IEPS. Programs should not exclude any qualified disabled student from any course or program

Oftentimes, secondary and accelerated learning teachers are not eligible for merit pay despite accessible metrics for doing so. It would be nice to do something similar to Florida around incentives based on successful accelerated learning outcomes:

AP scores (3 or higher = $50); Cambridge scores (Pass = $100; Merit/Distinction = $150); IB scores (Pass = $100; High Achievement = $150); Industry credentials (Credentials Earned = $100); Concurrent credit completion (Grade C or Higher = $25); Associate degrees (Associate Degree Earned = $250); Diploma of Distinction graduates: Academic Distinction = $50, Honors Distinction or Workforce Distinction = $75, Distinguished Scholar = $100

Division Response: Comment considered, no changes made. The scope of several topics within the comments exceeds the bounds of rulemaking and are better considered for future legislative

changes. Additionally, the ACCESS Act and expansion of accelerated learning opportunities are still being implemented and realized across the state.

Districts and schools are responsible for determining which acceleration options are appropriate and for finding higher education partners if those options include concurrent credit. If a partner does not provide appropriate concurrent opportunities, the district/school can make the choice to change partners.

If the student is not satisfied with the decisions made by the district/school, they can participate in the course choice program to access alternative accelerated learning opportunities at no cost to the student.

Commenter Name and Organization: Stephanie Legris; Southside High School

Comments:

Dear Division of Elementary and Secondary Education,
I am writing to submit public comments regarding the proposed **DESE Rule Governing Grading and Course Credit**.

Specifically, I wish to address the weighted GPA system as it applies to concurrent credit courses versus Advanced Placement (AP) courses. Under the current framework, both concurrent enrollment courses and AP courses are often given equivalent 6.0 GPA weighting from my understanding. I think it would be important to make a Division to establish a clear distinction between the two if you are going to go through with this change.

Concurrent credit courses—while valuable—frequently vary significantly in rigor depending on the partner institution and often do not match the standardized intensity, comprehensive curriculum, and rigorous terminal assessment of AP courses. Granting equal GPA weight to standard concurrent courses inflates GPA metrics without ensuring equivalent academic challenge. I propose that:

1. **A 6.0 (or full weighted) GPA credit should be reserved exclusively for AP courses taught by AP-certified teachers**, or concurrent courses that are directly tied to AP certification and audited standards that some high school campuses have lined up.

2. **Standard concurrent college classes should continue carrying a distinct weight** (5.0 continued) to properly reflect the difference in academic rigor and standardized expectations.

Maintaining a distinct tier for AP coursework incentivizes students to pursue nationally standardized, high-rigor academic pathways while ensuring GPA calculations accurately reflect course difficulty across different high schools and higher education partners in Arkansas. Thank you for your time, consideration of my comment, and dedication to maintaining high academic standards for Arkansas students.

Division Response: Comment considered, no changes made. The purpose of this rule is to implement LEARNS and ACCESS and to expand accelerated learning opportunities which include concurrent credit coursework. As a result of these policies, students in Arkansas will have the opportunity to graduate from high school collage credit which will allow students to graduate with a baccalaureate degree sooner and move into advanced coursework at the master's or professional degree levels.

Reducing the weight given for concurrent credit would failure to implement the policies of the general assembly and would limit the opportunities afforded by these polies.

Commenter Name and Organization: Brandie Williams; Trumann School District

Comments:

To the Arkansas Department of Education, Division of Elementary and Secondary Education:

Thank you for the opportunity to provide public comments regarding the proposed revisions to 6 CAR Part 96, Grading and Course Credit.

As superintendent of Trumann School District, I appreciate the efforts to establish consistent expectations for grading, high school credit, accelerated learning, and postsecondary opportunities. However, after reviewing the proposed revisions, I have several concerns and requests for clarification based on situations we are currently navigating at the local level.

My primary concern is ensuring that the rules provide clear, consistent, and enforceable expectations that can be applied fairly across Arkansas school districts and institutions of higher education. When rules leave significant decisions to separate guidance documents or institutional interpretation, districts are placed in difficult positions, and students may experience unintended consequences that limit their academic opportunities.

1. Page 13 – Reliance on Division Guidance and the Accelerated Learning Guide

The proposed rules reference implementation "in accordance with the Division's guidance" found in the Accelerated Learning Guide.

I am concerned about the degree of flexibility this language provides for decisions to be made through guidance documents rather than through the formal rulemaking process. While guidance documents can be valuable tools for implementation, they should not establish additional requirements, restrictions, or interpretations that extend beyond the intent of the law and adopted rules.

When a rule relies heavily on guidance that may be revised or interpreted without the same public review process, districts can find themselves implementing requirements that were not clearly established in statute or rule.
I respectfully request clarification regarding:

- Which requirements are established by law and rule versus those that are recommendations or implementation guidance?
- What authority does the Accelerated Learning Guide have to establish requirements beyond the adopted rules?
- What process will be used when guidance is revised, particularly if revisions affect student eligibility, course credit, or district responsibilities?
- How will DESE ensure that guidance remains consistent with legislative intent and does not create additional restrictions that were not contemplated in the law?

Recommendation: The rules should clearly establish the substantive requirements, with the Accelerated Learning Guide serving as an implementation resource rather than a mechanism for establishing additional requirements. Any guidance affecting student eligibility, academic credit, or district obligations should be clearly supported by statute or adopted rule.

2. Pages 18–19 – College Course Credit Hours and High School Credit/Weighted Credit

Additional clarification is needed regarding how college courses with varying semester credit hours translate into high school credit and weighted high school credit.

Many college courses are three-credit-hour courses. However, students also enroll in one-, two-, and four-credit-hour courses, including science laboratories, technical courses, and other courses required for completion of college credentials.

Our district is currently navigating questions regarding science laboratories and other courses that do not follow the traditional three-credit-hour structure.

The rules should explicitly address:

- How does a one-credit-hour college course translate into high school credit?
- How does a two-credit-hour college course translate into high school credit?

- Does a four-credit-hour college course receive the same high school credit as a three-credit-hour course, or is additional credit awarded?
- How are these courses treated for weighted GPA calculations when they otherwise qualify as concurrent credit?
- When a science course requires a separate laboratory course, how should the laboratory credit be recorded on the high school transcript?
- Are college credit hours evaluated individually or combined when a lecture and laboratory are required components of the same college course sequence?
- These questions have a direct impact on student transcripts, GPA calculations, graduation requirements, class rankings, and academic recognition.

Recommendation: Include a clearly defined statewide conversion standard or table that addresses one-, two-, three-, four-, and higher-credit-hour college courses and explains both the high school credit equivalency and the application of weighted credit when applicable.

This should also specifically address science laboratory courses and other required components of college degree and technical certificate programs.

Districts should not be left to interpret these situations independently, particularly when the outcome can affect a student's GPA, graduation standing, or eligibility for academic distinctions.

3. Page 20 – Requirement to "Meet All Prerequisites"

I understand and support the importance of students meeting appropriate academic prerequisites for college courses. However, the language requiring students to "meet all prerequisites" needs additional safeguards and clarification.
Our district has already experienced challenges with a local community college regarding prerequisites that appear to reflect institutional preferences rather than clearly established academic necessities.

These situations become particularly problematic when the institution also controls when courses are offered.

Students working toward technical certificates or associate degrees while completing high school have limited scheduling opportunities. When courses are not offered at appropriate times, or when preferred prerequisites create additional barriers, students can be prevented from completing an otherwise achievable credential.

This is especially concerning when students are participating in state-supported accelerated learning opportunities intended to expand access to postsecondary education. I respectfully request clarification regarding:

- Must prerequisites be formally published, consistently applied, and academically necessary for the specific course?
- Can institutions establish preferred prerequisites that become barriers to enrollment even when students otherwise demonstrate academic readiness?
- What protections exist when prerequisites are changed after a student has begun a planned program of study?
- What options are available when required courses are not offered within a reasonable timeframe?
- Is there a process for districts or students to request review of prerequisites that appear unnecessary, inconsistent, or overly restrictive?
- How will DESE and the Division of Higher Education ensure that institutional requirements do not unintentionally prevent students from completing technical certificates or associate degrees?

Recommendation: The rules should specify that prerequisites must be formally established, academically justified, consistently applied, and communicated in advance. Institutions should not be permitted to use informal preferences or inconsistent prerequisite practices to create unnecessary barriers for eligible students.

There should also be a clearly defined process for resolving disputes between districts and postsecondary institutions when prerequisite requirements or course availability interfere with a student's approved academic pathway.

The intent of accelerated learning opportunities should be to remove unnecessary barriers, not create additional ones.

4. Pages 22–23 – Meaning of "Satisfied Through Foundation Funding Established"

The language referencing requirements being "satisfied through foundation funding established" needs further clarification.

It is unclear what specific financial obligation is considered satisfied through foundation funding and how this provision is intended to operate at the district level.

I respectfully request clarification regarding:

- What specific costs or obligations are considered satisfied through foundation funding?
- Does this language mean that districts are expected to absorb certain costs through their existing foundation funding allocations?
- How does this provision interact with dedicated funding for accelerated learning, concurrent credit, and other state-supported educational opportunities?

- If the actual cost of providing the required opportunity exceeds the amount contemplated through foundation funding, what financial responsibility remains with the district?
- Does this provision establish any limitation on additional state funding or reimbursement?

Recommendation: The rules should explicitly identify the obligation being satisfied, the funding source, and the extent of district financial responsibility.

Language regarding school funding should be sufficiently clear that districts can accurately budget for their responsibilities without relying on subsequent interpretation.

5. **Page 25 – Dual Enrollment, Concurrent Credit, Summer Coursework, and ACCESS to Acceleration Funding**

I believe this section requires significant clarification to ensure consistent statewide implementation.

There continues to be confusion regarding the distinction between dual enrollment and concurrent credit, particularly when students take college courses during the summer. Consider a high school student who is actively working toward an associate degree or technical certificate while also pursuing a Diploma of Distinction.

Due to college course availability, required sequencing, or scheduling conflicts, the student may need to complete a required college course during the summer.

In some cases, the student may still have unused ACCESS to Acceleration funding available. In other cases, the student may have exhausted those funds, but the school district may agree to pay for the summer coursework to help the student complete the credential.

In either situation, the student's purpose for taking the course remains the same: to complete an approved academic pathway while still enrolled in high school.

I respectfully request explicit clarification of the following:

- If a student has remaining ACCESS to Acceleration funds and uses those funds for an eligible summer college course, can that course be recorded as concurrent credit and receive applicable weighted high school credit?
- If a student has exhausted ACCESS to Acceleration funding but the district agrees to pay for an eligible summer college course, can that course still be recorded as concurrent credit and receive applicable weighted high school credit?

- Does the funding source determine whether a course is considered concurrent credit or dual enrollment?
- Does the time of year in which the course is taken determine its classification?
- If the course is part of an approved pathway toward an associate degree, technical certificate, or Diploma of Distinction, can it count toward high school graduation requirements and weighted GPA calculations when all other eligibility requirements are met?
- What documentation or district approval must be in place before the student enrolls for the course to qualify for high school credit and applicable weighted credit?
- How should districts transcript these courses to ensure consistent treatment statewide?

Recommendation: The rules should clearly distinguish between concurrent credit and dual enrollment and establish objective criteria for determining how college courses are classified, awarded high school credit, and weighted.

Specifically, I request that the rules allow eligible summer college coursework to be recognized as concurrent credit, including applicable weighted high school credit, when the student remains enrolled in high school, the course meets applicable academic requirements, and the district has approved the course for high school credit.

The classification should not automatically change simply because the course is offered during the summer or because the funding source differs.

This flexibility is especially important for students pursuing technical certificates, associate degrees, and the Diploma of Distinction. Districts should be able to support students in completing these pathways without creating unintended academic penalties due to college course scheduling limitations.

A student should not lose an opportunity for weighted high school credit simply because a required college course was only available during the summer rather than during the traditional school year.

I appreciate the work that has gone into these rules and the continued efforts to provide more opportunities for Arkansas students. My comments come from situations we are currently working through in our district, and I hope they will be helpful as the rules are finalized.

We want to do what is best for our students while making sure we are following the law and rules correctly. When there are areas that leave room for different interpretations, it can become difficult for districts, counselors, families, and even our college partners to know exactly how to proceed. We have experienced some of these challenges firsthand, and I believe a little more clarification in the rules could prevent a lot of confusion moving forward.

I am especially appreciative of the opportunities Arkansas has created for students to earn college credit, technical certificates, and even associate degrees while still in high school. These are tremendous opportunities for our students, and I want to make sure we are doing everything we can to help them take advantage of those opportunities without unnecessary barriers.
I would simply ask that we make these rules as clear as possible, with some specific examples where needed, so that districts across the state can implement them consistently and students are treated fairly regardless of which school district or college they attend.

Thank you for taking the time to consider these comments and for your continued work on behalf of Arkansas students.

Brandie Williams
Superintendent

Division Response: The following responses are provided:

1. Comment considered, no changes made. The Accelerated Learning Guide is a resource which will be used to assist schools in the implementation of these rules. Given the nuanced variations between classes offered by hundreds of school districts and the thousands of classes offered across the state, a guidance document is a useful tool to address issue a level of detail to fine to be reliably incorporated into law. The rule requires that the school's actions be taken with the guidance document in view; however, the division acknowledges that the guidance does not and cannot carry the force of law.

2. Comment considered, no changes made. The comment proposes policy which has not been adopted by the division at this time. Concurrent credit and dual enrollment are commonly available opportunities in many Arkansas schools and the Arkansas schools consistently and routinely award credit despite the differences in the way institutions of higher education and public K-12 schools style the credit and hours related to their classes.

3. Comment considered, no changes made as they exceed the division's scope of authority as it relates to institutions of higher education. The remainder of this comment proposes policy which has not been adopted by the division at this time.

4. Comment considered, no changes made as the rule directly cites to the statute related to foundation funding.

5. Comment considered, no changes made. The primary distinction between dual and concurrent credit is that with concurrent credit courses, a prior agreement has been reached between the MOU between the institutions of higher education and public K-12 schools establishing at the ousted what credit would be available and on what terms it would be awarded. Dual enrollment is a situation where the student takes a course at the

institution of higher education despite there being no prior agreement between the institution of higher education and public K-12 school. A2A funds are only available for concurrent credit therefore course will need to be sanctioned in advice by both the institution of higher education and public K-12 school. This should create much of the clarity the comment seeks.

In the context of dual enrollment, districts have the flexibility to award dual credit coursework if the school determines that the credit is entitled to weighted credit under this part. If it meets the definition of an accelerated learning course, there is no barrier to giving that course the appropriate weight.

As to the point related to pathways and technical certificates, there is a section within the rules, § 96-402, that provides guidance. Further, the Course Code Management System will clearly state the weight given for each course which will provide further clarity. Issues addressing A2A scholarship are governed by their own rule, 6 CAR pt. 408 and this portion of the comment is not given a full treatment here. However, the ADE is available to help provide assistance should additional clarity be needed beyond the text of 6 CAR pt. 408.

Commenter Name and Organization: April Weeks

Comments:

Good afternoon,

Thank you for the opportunity to provide feedback on the proposed grading and weighted credit rules.

I support expanding accelerated learning opportunities and providing students with multiple pathways to challenge themselves and prepare for future success. However, I am concerned that additional clarity is needed regarding which courses will qualify for the proposed 6.0 weighted scale. While this may be more clearly defined in an updated Accelerated Learning Guide, it is difficult to assess the impact of this rule without understanding those parameters. I am concerned that the weighting structure could unintentionally influence student course-taking decisions and shift enrollment patterns among AP, concurrent credit, honors, and other accelerated learning options.

This concern stems from a broader question about the incentives created by expanded weighted credit. If not carefully implemented, students may feel pressure to complete graduation requirements at increasingly younger ages regardless of whether acceleration is developmentally appropriate. Acceleration should be driven by student readiness and educational need, not by the pursuit of weighted credit.

If automatic enrollment practices outlined in the current Accelerated Learning Guide are implemented, additional guidance regarding the definition of "readiness" would be

beneficial. Readiness should consider more than academic performance alone and should include factors that support long-term student success.

Ultimately, legislation may not be the concern. The success of these rules will ultimately depend not only on the legislation itself, but on the implementation guidance and local policies that follow. Thank you for your consideration.

Division Response: Comment considered, no changes made. The Accelerated Learning Guide is a resource which will be used to assist schools in the implementation of these rules. Given the nuanced variations between classes offered by hundreds of school districts and the thousands of classes offered across the state, a guidance document is a useful tool to address issue a level of detail to fine to be reliably incorporated into law. Further clarity will be established when the rule is implemented withing the Course Code Management System will list each course and the respective weight.

Commenter Name and Organization (if applicable): Kristina Hudson

Comments:

Good evening,

My feedback on the grading rules is the following:

1. Is there consideration to limit weighted concurrent credit to core content courses?

Thank you

Division Response: Comment considered, no changes made. There is not currently a consideration to limit weighted concurrent credit to core content courses.