

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES  
GOVERNING TUTORING GRANTS  
PUBLIC COMMENTS AND RESPONSES**

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.01.1, for consistency with other rules, I would recommend changing “under this section” to “under Section 2.05”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.02.1, to provide some clarity on how this section reads, I would recommend changing it to read “Is determined by the division to not meet the reading standard, as defined by the state board, under Section 2.02.1.1 or section 2.02.2”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: For consistency with other rules, all of your Arabic numerals for percentages here are missing the longhand with the Arabic numerals in parenthetical afterwards.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.04.1.5, I would recommend adding a “an” between “unless” and “expenditure” at “unless expenditure is”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.05.1.2, I would recommend changing this to “under Section 2.01” for consistency with other rules.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.06.4, for consistency with other rules, I would recommend changing this to “under Section 2.06”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 2.08.8, for consistency with other Rules, I would recommend adding “Section” before “2.08”. I would also recommend adding “Sections” before “2.08.1 -2.08.4”. I would similarly add “Section” before “2.03”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 3.01.3.1 for consistency with other rules, the “three” here is missing the parenthetical Arabic numerals afterwards and the “30” is missing the longhand with the Arabic numerals being in a parenthetical afterwards.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: For consistency with other Rules, I would recommend changing “under this section” to “under these Rules”.

Division Response: **Comment considered. No changes made.**

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services  
Director, January 12, 2024

Comments: In section 3.04.3, for consistency with other rules, the “four” here is missing the parenthetical Arabic numerals afterwards.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, January 12, 2024

Comments: In section 3.04.5.1 for consistency with other rules, the “three” here is missing the parenthetical Arabic numerals afterwards and the “30” is missing the longhand with the Arabic numerals being in a parenthetical afterwards.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, January 12, 2024

Comments: In section 3.10.1, for consistency with other Rules, I would recommend adding “Section” before “3.10”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, January 12, 2024

Comments: In section 4.02.8, for consistency with other rules, I would recommend changing this to read “under Section 3.01”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, January 12, 2024

Comments: In section 5.01.7, for consistency with other rules, I would recommend changing this to read “by Section 5.01”.

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

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Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, January 12, 2024

Comments: In section 5.02.1, it reads as though some language may be missing from the end of this section. I would recommend changing this to read “Data regarding participating public

school or open-enrollment public charter school students' access to high-impact tutoring and program implementation, including by geography, grade span, and subject. The data shall be based on program requirements, including without limitation.”

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

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