

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING ARKANSAS GOVERNOR’S SCHOOL
PUBLIC COMMENTS AND RESPONSES**

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 3.04: - I would recommend changing this to read “based on one or more of the following, without limitation:”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 3.05.1 - The longhand and the parentheses are missing for “15”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 3.06.1.1 - The longhand and parentheses are missing for “5” and “ten”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 5.02 - The longhand and parentheses are missing for “28” and “38”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 5.02.3 - The longhand and parentheses are missing for “4”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 5.02.4 - The parenthetical arabic numerals are missing for “six” and “seven”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 5.04 - This paragraph should end with a colon instead of a semicolon.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 6.04 - The longhand and parentheses for “18” are missing.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 6.05 - The parenthetical Arabic numerals for “three” are missing.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 7.01.1 - The longhand and parentheses are missing for “10%”.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 8.01 - The parenthetical Arabic numerals for “one” are missing.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 10.03.1: I believe that “volunteer” should be “voluntary” instead.

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

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, 5/24/2024

Comments: 12.01.9 - I’m not sure if this is supposed to be a “12.01.2.8” or a “12.01.3” but it definitely is not supposed to be “12.01.9”.

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

Commenter Name: Peter Dykema, Arkansas Tech University, Professor of History, 5/30/2024

Comments: 5.02 - This new rule provides much needed flexibility to the length of the program. The old rule that defined the 4-week program as 28 calendar days without a break gave no flexibility. The new rule gives a range of length from 28 days to 38 days and provides the option of a multi-day break (5.02.3). This allows AGS to start before July 4th, offer a break around the 4th, and then finish up earlier in the summer. Currently, the demand to go 28 days without a break forces AGS to start immediately after the 4th and run into very early August, coming up fast to the start of the new academic year. The new rule offers more flexibility and is an improvement.

Suggestion: I suggest you extend the range still further, from 21 days to 38 days. This is not to promote a shorter program. This is to offer the possibility of a shorter program, if necessary. Budgetary shortcomings may demand a shorter program. Inflation may demand a shorter program. A stomach virus may demand a shorter program (sorry, Girls State). The continuous rise in other opportunities (Boys State, Girls State, athletic camps, band and choir camps, prep for fall team sports) creates competition with AGS. Many students might prefer a shorter AGS program. Extending the range down to 21 days does not mean the program would have to be 21 days. It merely means a shorter program could be an option. A program of 24 days, or 26 days,

could also be options. In 2024, we are facing some budget difficulties hosting a 28-day session with the allocation of \$640,000. If we were allowed to offer even a 27-day session, that would allow budgetary breathing room.

The point is this: the length of the program will always be linked to the available funding. The more flexibility, the better.

The numbering on rule 5 may have an error. The rules jump from 5.04.1.1 to 5.09.1.2 (PDF screen 10) : then they continue with 5.09.2, etc. I'm thinking the rules need to be re-numbered from 5.04.1.1 to the end of rule 5.

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

Commenter Name: Peter Dykema, Arkansas Tech University, Professor of History, 5/30/2024

Comments: 6.05.3 Area II - If you read the text of the next several lines, you'll see the repeated word "thinking." That's fine. That is indeed the focus of Area II: how to think. But when more specific applications are mentioned, I only see one example: Logic. For years, Area II has stressed "thinking about thinking" or "the nature of knowledge" and logic has always been part of the discussion. So far, so good. But I only see Logic. For years, Area II has also stressed Ethics. We currently spend about half the time in Area II on "ethical thinking" or "how do we think ethically?"

I think there is still enough wiggle room in the language to allow an application of thinking ethically. But I would suggest an explicit addition of the word "Ethics" to line 6.05.3.5.

Division Response: Comment considered. No changes made; the suggested language is already allowed within the rule as written.

Commenter Name: Peter Dykema, Arkansas Tech University, Professor of History, 5/30/2024

Comments: 6.05.4 Area III - Here the new rules focus explicitly on personal development, communication skills, and how to apply personal and communication skills "in their own lives and communities."

Currently, Area III focuses on personal development as well as social development and social change. Beyond the words "and communities," I don't see much room for social concerns and social change. If this is intended, so be it. If not, I suggest the inclusion of a few words beyond "get along with others," "civil manner," and "and communities" to expand Area III to include where and how the individual fits into society more broadly. Some words/phrases that come to mind: citizenship, informed citizenry, social issues, social impact, social change, active citizenship, or even just something like "the individual in society."

Division Response: Comment considered. No changes made; the suggested language is already allowed within the rule as written.

Commenter Name: Peter Dykema, Arkansas Tech University, Professor of History, 5/30/2024

Comments: 13.01.1 Grant cycles are every five (5) years.

Commentary:

Pros: For years, the grant cycles have been 3 years. Extending them to five years will bring more stability. The host institution will be able to do more long-term planning and can effectively make improvements knowing they will host AGS for several more years.

Cons: A five-year cycle raises questions about budgetary uncertainty. Five years is a big commitment for a host university to make when the amount of available grant funds won't be known five years into the future. Do any of us know how much the General Assembly will appropriate for AGS for the year 2028? Do we even know how much they will appropriate for 2025?

The budget is unpredictable. Inflation is unpredictable. This is why more flexibility is better.

AGS can only adapt in a few ways if the budget becomes a problem: cut costs, invite fewer students, invite them for a shorter session. Cutting costs works until no more can be cut without losing quality. I already proposed above a wider range for the length of the program: 21 days to 38 days. That would allow the host institution to look at the funding available, look at the budget, and decide whether to offer a 28-day program, or perhaps 26, or perhaps 24. The only other alternative is to invite fewer students. The goal is to invite 400. What if the budget can only allow 340 or 360?

Summary: Five years is a long commitment. I would expect that all university applicants for Arkansas Governor's School would hesitate making a 5-year commitment without some funding promises up-front or with flexible options to shorten the program or limit the number of students in the case of a looming budgetary shortfall.

Division Response: **Comment considered. No changes made. Budget estimates are included in the request for proposals and budget variations are accounted for annually based on funding appropriations.**
