

**DIVISION OF CAREER AND TECHNICAL EDUCATION
RULES GOVERNING THE ARKANSAS ADULT DIPLOMA PROGRAM
PUBLIC COMMENTS AND RESPONSES**

Commenter Name: Dr. Dennis Felton Jr., Vice President of School Operations, Responsive Education Solutions, Inc.-Arkansas, Executive Director, Arkansas Works

Comments: *Submitted Electronically and in person*

In Person public comment transcript (December 2, 2025): OK. My name is Dr. Dennis Felton, Jr. I serve as the vice president of school operations for Responsive Aid Arkansas, as well as our executive director of our adult ed program, which we call Arkansas Works. upon review of the proposed rulemaking we are excited about the new changes and believe that some of the changes will assist organizations like responsibly in their ability to be able to attract dropout recovery adults and put them on the path to be able to achieve a high school diploma one of the things that we want to recommend to the state to consider making exception is waiving the additional graduation requirements that are currently necessary for adults to be considered a high school graduate in Arkansas we believe that these requirements were originally based on traditional high school students and May pose barriers to adult learners particularly those engaged in a dropout recovery program all graduates should be required to meet the 22 credit fulfillment as far as me graduation requirements. However, we are seeking that they would take in consideration waiving the additional graduation requirements. And so I do have those graduation requirements outlined. And this also would apply for only the adults in the program, which are over the age of 21. One is a digital learning course credit which is outlined in ACA 616-1406. The other one is the personal and family finance course where students must earn a credit in a course that includes personal and family finance in grades 9 through 12 which is outlined in ACA 616-135. The other one is that students must p*** the Arkansas civics exam which is outlined in ACA 616 149 the other requirement is CPR training students must complete CPR training which is outlined in ACA 616 143 and then the last requirement is the computer science course requirement which beginning will begin at 22 23 school year where public high school student shall be required to earn at least one unit of credit in an ADE-approved high school computer science course before graduating, which is outlined in ACA 616-152. Also want to express our concerns in regards to the graduation rate calculation and want there to be consideration in the proposed rulemaking as far as how is that graduation rate calculated within the adult diploma program. It has come to our attention that the rules do not explicitly define what constitutes the graduation rate. However, it does have it set up where there's a cohort that enters an adult ed program. And then after a certain measurement period, the providers report back the individuals that graduated from the program based on the individuals they receive funding for. and we understand that graduating adults within a small physical period especially within one or two years could become difficult because of the individual circumstance the educational needs of those individuals and so like in a traditional setting you May have an adult that comes in that maybe does need a half a year a year worth of credit to get done but then there are adults they have minimum credits that are attained

towards high school diploma, which it May take multi-years in order to be able to achieve and fulfill the graduation requirements. And so the Carington System relies on a cohort model that kind of determines funding based on the number of participants each year. However, in our experience, this approach does not accommodate the unique situations of adult learners who May need extended period of time to complete their education requirements we strongly advocate for allowing providers to place adults in cohort to extend up to four years and potentially not be penalized from a graduation rate perspective for those entered in that cohort this flexibility will enable us to create personalized graduation plans that will be aligned to the specific needs of each learner ultimately supporting their journey towards high school receiving a high school diploma So we appreciate your consideration of this request and these recommendations and look forward to how we can continue to discuss this and better support our adult learners in Arkansas. Thanks, sir. I believe I heard you mention you May have had some written dot. You can also provide those. Do I give those to you or do I submit it online? Okay, that'll be fine. We'll have it then. Yes, sir.

Email and Attachment (November 21, 2025): To whom this may concern, I am writing to submit our public comment concerning the Rules Governing the Arkansas Adult Diploma Program (Amendment). Please find our comments attached for your review. Thank you for considering our input

Attached public comment pdf.

Division Response: Comment considered, no changes made. The comment requests policy changes beyond the scope of the current preposed draft. The Division will consider the recommended policy for future rulemaking.



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To: Arkansas Department of Education | Division of Career & Technical Education

Subject: Public Comments for AR Adult Ed Diploma Program

Date: November 2025

Overview

ResponsiveEd Arkansas (AR approved program provider) is recommending that the state make an exception and waive certain additional graduation requirements that are currently necessary for adults to be considered a “high school graduate” in Arkansas. We believe that these requirements were originally established for traditional high school students and may pose barriers to adult learners, particularly those engaged in dropout recovery programs. All graduates will be required to meet the twenty-two (22) credits needed to fulfill graduation requirements. Below are the specific graduation requirements we request to be waived solely for the AR Adult Diploma Program.

Graduation Requirements for Waiver

We propose the waiver of the following graduation requirements for adults over the age of 21:

1. **Digital Course Requirement:** Students must complete a digital course for credit (A.C.A. § 6-16-1406).
2. **Personal and Family Finance Course:** Students must earn a credit in a course that includes Personal and Family Finance in grades 9-12 (A.C.A. § 6-16-135).
3. **Arkansas Civics Exam:** Students must pass the Arkansas Civics Exam (A.C.A. § 6-16-149).
4. **CPR Training:** Students must complete CPR training (A.C.A. § 6-16-143).
5. **Computer Science Course Requirement:** Beginning with the entering ninth-grade class of 2022-2023, a public high school student shall be required to earn one (1) unit of credit in an ADE-approved high school computer science course before graduating (A.C.A. § 6-16-152).

Concerns Regarding Graduation Rate Calculation

I would like to express our concerns about the current graduation rate calculation as outlined in the Rules Governing the Arkansas Adult Diploma Program. It has come to my attention that the rules do not explicitly define what constitutes the graduation rate, which raises significant challenges for both providers and participants.

Graduating adults within a single fiscal year can be exceptionally difficult due to various factors, including individual circumstances and educational needs. The current system relies on a cohort model that determines funding based on the number of participants each year. However, this approach does not accommodate the unique situations of adult learners who may require more time to complete their education.

I strongly advocate for allowing providers to place adults in a cohort that extends up to four years. This flexibility would enable us to create tailored graduation plans that align with the specific needs of each adult learner, ultimately supporting their journey toward graduation more effectively.

We appreciate your consideration of this request and look forward to discussing how we can better support adult learners in Arkansas.

Thank you for your attention to this important matter.

Sincerely,

Dr. Dennis Felton Jr.

Vice President of School Operations, ResponsiveEd Arkansas

Executive Director, Arkansas Works