

## DESE RULES GOVERNING PUBLIC CHARTER SCHOOLS

### Public Comments and Responses of the Division of Elementary and Secondary Education

Commenter Name: Lucas Harder, Arkansas School Boards Association (1/20/22)

Comment (1): 3.12: To clarify the new language, I would recommend amending this to read as “Debt does not include when charters enter” instead of “An exception is that charters may enter”.

Division Response: Comment considered. **Non-substantive change made in part.**

Comment (2): 3.14.1: There is a space between the period and fourteen.  
3.14.2: There is a space between the period and fourteen.  
3.14.3: There is a space between the period and fourteen.  
3.14.4: There is a space between the period and fourteen.

Division Response: Comments considered. **Non-substantive changes made.**

Comment (3): 3.20.3: While I recognize that this language matches the statutory definition from 6-23-103, I would recommend updating to recognize the passage of the Every Student Succeeds Act in 2015 to ensure that it’s not out of alignment with Federal law.

Division Response: Comment considered. **Non-substantive change made.**

Comment (4): 3.20.4: While I recognize that this language matches the statutory definition from 6-23-103, I would recommend updating to recognize the passage of the Every Student Succeeds Act in 2015 to ensure that it’s not out of alignment with Federal law.

Division Response: Comment considered. **Non-substantive change made.**

Comment (5): 3.24: The “4” here is unnecessarily struck.

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

Comment (6): 4.03.1.3: The “this” here is unnecessary.

Division Response: Comment considered. **Non-substantive change made.**

Comment (7): 4.06.2.2: There is a repeat of “the” at “under the the Arkansas”.

Division Response: Comment considered. **Non-substantive change made.**

Comment (8): 5.01.3.8.1: There is an unnecessary period after the “1”.

Division Response: Comment considered. **Non-substantive change made.**

Comment (9): 5.06.7: The note here references Sections 8 and 9 of the Rules and should actually reference Sections 9 and 10 of the Rules.

Division Response: Comment considered. **Non-substantive change made.**

Comment (10): 5.08.2: The note here references Sections 8 and 9 of the Rules and should actually reference Sections 9 and 10 of the Rules.

Division Response: Comment considered. **Non-substantive change made.**

Comment (11): 6.03.2: I believe that this should read “open-enrollment” instead of “conversion”.

Division Response: Comment considered. **Non-substantive change made.**

Comment (12): 6.04.3.1: I would recommend either removing the “an” from in front of “open-enrollment charter schools” or removing the final “s” from “open-enrollment charter schools” to fix a grammar issue.

Division Response: Comment considered. **Non-substantive change made.**

Comment (13): 6.11.3.1: There is a space between the period and the “3” here.  
6.11.3.1.1: There is a space between the period and the “3” here.  
6.11.3.1.2: There is a space between the period and the “3” here.  
6.11.3.2: There is a space between the period and the “3” here.

Division Response: Comments considered. **Non-substantive change made.**

Comment (14): 6.17: There are currently two 6.17s. I believe that the second one should be 6.17.11.

Division Response: Comment considered. **Non-substantive change made.**

Comment (15): 6.17.1: There are two 6.17.1 in the document. I believe that this was supposed to be 6.17.11.1. There is also a space between the period and the “17”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (16): 6.17.2: There are two 6.17.2 here. I believe that this one is supposed to be 6.17.11.2. Also, there is a space between the period and the “17”.

Division Response: Comment considered. **Non-substantive changes made.**

Comment (17): 6.20.1: There is a space between the period and “20”.  
6.20.2: There is a space between the period and “20”.  
6.20.3: There is a space between the period and “20”.  
6.20.4: There is a space between the period and “20”.  
6.21.1: There is a space between the period and “21”.  
6.21.2: There is a space between the period and “21”.

6.21.3: There is a space between the period and “21”.

Division Response: Comments considered. **Non-substantive changes made.**

Comment (18): 6.22.8: The note here references Sections 8 and 9 of the Rules and should actually reference Sections 9 and 10 of the Rules.

Division Response: Comment considered. **Non-substantive change made.**

Comment (19): 6.23.5: The note here references Sections 8 and 9 of the Rules and should actually reference Sections 9 and 10 of the Rules.

Division Response: Comment considered. **Non-substantive change made.**

Comment (20): 6.26.1.1: There is a space between the period and “26” here.  
6.26.1.2: There is a space between the period and “26” here.  
6.26.1.3: There is a space between the period and “26” here.  
6.26.1.4: There is a space between the period and “26” here.  
6.26.1.4.1: There is a space between the period and “26” here.  
6.26.1.4.2: There is a space between the period and “26” here.  
6.26.1.4.3: There is a space between the period and “26” here.  
6.26.2: There is a space between the period and “26” here.  
6.26.3: There is a space between the period and “26” here.  
6.26.3.1: There is a space between the period and “26” here.  
6.26.4: There is a space between the period and “26” here.

Division Response: Comments considered. **Non-substantive changes made.**

Comment (21): 8.05.4: This should actually read “Family Educational Rights and Privacy Act” instead of “Federal”.

Division Response: Comment considered. **Non-substantive change made.**

Comment (22): 10.04.1.4: As there does not appear to be a Section 10.03.1.3, I believe that this is actually intended to reference Section 10.03.1.

Division Response: Comment considered. **Non-substantive change made.**

Comment (23): 11.01.1: There appears to be a colon missing from the end of this section.

Division Response: Comment considered. **Non-substantive change made.**

Comment (24): 11.03.1.2.2: This section continues to reference “academic distress”, which no longer exists as a category under law or rule.

Division Response: Comment considered. **Non-substantive change made.**

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