

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING COMMUNITY SERVICE AND DIPLOMA REQUIREMENTS
PUBLIC COMMENTS AND RESPONSES**

Commenter Name: Lucas Harder, Arkansas School Boards Association, Policy Services Director, April 3, 2024

Comments: *Submitted electronically.*

3.02.3: I believe that the “an” at the end of this paragraph is supposed to be “can”.

3.04.1: For consistency with other rules, there should be a “or older” after “age”.

3.04.1.2: This language appears to conflict with Section 3.04.1, which requires the waiver to be approved by the governing board of the open-enrollment charter school and this section says that it is only required by the executive director.

Division Response: **Changes were made to correct non-substantive grammar and punctuation errors consistent with the comment. No additional changes were made.**

Commenter Name: Kendra Clay, Springdale Public Schools, April 23, 2024

Comments: *Submitted electronically.*

3.02.3 It is burdensome for districts to be responsible for ensuring that community service partners are able to ensure student safety and privacy; perhaps DESE and the state board could take on vetting and approving community service partners or provide specific guidelines on what each partner should have in place to ensure student safety and privacy

3.05 the responsibility of entering community service hours yearly instead of a one-time entry into eschool is burdensome

Division Response: **Comment considered; substantive changes were made after the first public comment period to section 3.02.3. No additional changes were made.**

Commenter Name: Mike Mertens, AAEEA, Assistant Executive Director, April 22, 2024

Comments: *Submitted electronically.*

DESE Rule Community Service and Diploma Requirements:

Section: 2.0 - Definitions

Suggested Change/Concern: Include a definition of Community Service.

Rationale: This will provide clarity on what constitutes community service as stated on the DESE website under Community Service Learning.

Section: 2.04 - Partnering Organizations

Suggested Change/Concern: Allow the parents to approve the partnering organization in addition to the district.

Rationale: Parents are in the best position to support the district in choosing where a student could do community service. This will empower parents and could limit the burden for school districts to be the sole decision maker in approving a partner.

NOTE: There are two definitions labeled 2.04 and two labeled 2.01 under this section.

Section: 3.02.3.1 - Ensuring Student Safety

Suggested Change/Concern: Make language clear that the partnering organization is responsible for ensuring this section and not the district.

Rationale: This language is not clear and could be interpreted that the background checks are the responsibility of the district for any partnering organization.

Section: 3.02.3.2 - Necessary Equipment

Suggested Change/Concern: Make language clear that the partnering organization is responsible for providing this section and not the district.

Rationale: This language is not clear and could be interpreted that the equipment and training are the responsibility of the district for any partnering organization.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Karen Walters, Bryant School District, Superintendent, April 22, 2024

Comments: *Submitted electronically.*

Community Service Requirements Rules - Public Comments Submitted by Bryant Public Schools

Section 2.0 Definitions “Community Service” is not defined. Please include a definition.

Section 2.04 The definition for “Partnering Organization” requires school board approval. Since the law does not require the board of each district to approve partnering organizations, please omit.

Instead, please consider language that provides flexibility that districts may approve partnering organizations, or districts may adopt a policy that allows parents to determine appropriate partnering organizations. Parents should have the right to determine where their student serves.

Section 3.02.3 “When designing community service programs or activities, a public school district shall explicitly address student safety and ensure that any partnering organization has the infrastructure to accommodate students, including that the partnering organization [c]an:

3.2.3.1 - Ensure student safety and privacy, which may include background checks and ethical conduct protocols; and

3.02.3.2- Provide any necessary equipment, training, or both.”

- 1) These requirements for school districts are not found in the law.
- 2) It is not reasonable to require school district staff to ensure the safety and privacy of students while those students volunteer with outside organizations, including during school breaks, summer months, weekends, evenings, out of state, etc.
- 3) School district staff cannot conduct background checks for outside organizations.
- 4) School districts do not have the resources or personnel to manage and monitor outside community organizations.
- 5) Districts have not been provided with any funds to implement the community service requirement. Providing equipment for community service opportunities should not be the responsibility of the district.

Section 4.1 Please allow academic credit for community service to continue for those students who need the benefit for a rigorous college admissions process. It is understood that AR LEARNS sunsets the current program. However, there is nothing that would prohibit DESE from continuing the elective academic credit.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Holly Glover, Ed.S, Director of Curriculum & Instruction, Beebe School District, April, 22, 2024

Comments: *Submitted electronically.*

3.02.3 When designing community service programs or activities, a public school district shall explicitly address student safety and ensure that any partnering organization has the infrastructure to accommodate students, including that the partnering organization an:

3.02.3.1 Ensure student safety and privacy, which may include background checks and ethical conduct protocols; and

3.02.3.2 Provide any necessary equipment, training, or both.

Implications

3.02.3.1 allows students to obtain community service before, during, and after school hours. However, 3.02.3.1 requires districts to ensure student safety and privacy, which may include background checks and ethical conduct protocols. A district can not be responsible for student safety outside of the school day while students are obtaining community service. The fiscal impact of districts providing training and/or background checks to every person who could possibly have an interaction with a student during community service is not reasonable. Districts cannot be responsible for the equipment and/or training for these organizations.

Section 3.00 Community Service Requirement

3.03.1 The minimum number of community service hours for each grade level for transferring students shall be:

3.03.1.1 Fifteen (15) hours for students in grade nine (9);

3.03.1.2 Twenty (20) hours for students in grade ten (10);

3.03.1.3 Twenty (20) hours for students in grade eleven (11); and

3.03.1.4 Twenty (20) hours for students in grade twelve (12).

Conflicts

3.01 Beginning with the graduating class of 2026-2027, a public high school student shall complete a minimum of seventy-five (75) clock hours of documented community service in grades nine through twelve (9-12), as certified by the partnering organization with which the public school student volunteers, in order to graduate. The law does not specify the number of hours a student has to obtain each year.

Implications

Section 3.03.1 puts an unnecessary burden on students who may be transferring from out of state, homeschool, etc. This also puts an unnecessary burden on parents by petitioning the school's Board of Education to be voted on at the next school board meeting. The required number of hours for each grade level should be removed from the law. There should be recommended hours to keep students on track, but not required.

Division Response: Comment considered; substantive changes were made after the first public comment period to sections 3.02.1, 3.02.2, and 3.02.3. No additional changes were made.

Commenter Name: Veronica Womack, April 21, 2024

Comments: *Submitted electronically.*

Good morning,

I have a student that attends high school and wanted to express my views on the new volunteer requirements. I do believe volunteering in your local community is important and impactful for both the individual and the community. My biggest drawback about the requirements are the amount of hours required and the restrictions on how many hours they are required to get each year. I believe five hours per grade level is enough for any student, with the total graduation requirement to be 20 hours.

The families should have the flexibility to complete the required hours either year by year or at one time as long as the requirements are met. In addition, the students should be allowed to use their summer break or any other time off from school to complete the hours. Volunteering shouldn't be something forced upon anyone! In order for this to impact both the students and the community it needs to be a DESIRE to WANT to help the community NOT forced. If students choose to do more hours they can submit the additional time as well.

I hope the board takes into consideration my recommendation and at least look reducing the requirements. We do not know every family situation and the board of education should be working with the families to ensure each child has the opportunity to quality and impactful education.

Best regards

Veronica Womack

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Michael Landry, Northeastern State University of Oklahoma, Emeritus Professor of Marketing, April 21, 2024

Comments: *Submitted electronically.*

Please note my opposition to any community service requirement for high school graduation.

As some have already pointed out, low-income students may need to work at paid jobs and there may be transportation problems.

Students in rural areas also may have issues with transportation.

Community service is what we used to call volunteer work.

Making community service a requirement means it's no longer voluntary. The only time it should not be voluntary is when we use it as a form of punishment for minor criminal cases.

High school students need to be focused on academic issues coupled with optional extracurricular activities like sports, music, etc. And they may have other responsibilities like jobs, family, church or clubs of personal interest.

Of course, we should encourage community service but remember it's primarily for people who are in a personal, academic, and financial place where they can volunteer their time toward community improvement.

High school students don't need another demand.

That said, I don't consider career internships as community service -- they are for career advancement.

Thanks for your consideration.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Christopher Wayman, April 21, 2024

Comments: *Submitted electronically.*

This is so selfish I wonder will she do any community service work while she is in office she so busy buying podiums these kids already have jobs and most play sports ask her will her kids have to do community service work before they graduate I think not because they are in private school....

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jamie Schilder, April 20, 2024

Comments: *Submitted electronically.*

What about kids who are doing online public school and don't have counselors to lead them in the right direction on where to get community service hours. I don't think putting more on kids when really all they should be focused on are academics and extracurricular activities and bullying, social anxiety, etc. That's just more than some kids can handle.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Sherry Bowers, April 20, 2024

Comments: *Submitted electronically.*

I think you're on the right track. However 75 hours is a bit too much. I suggest 40 to 50 hours of volunteer work in career fields of interest would be ideal.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Stephanie Hughes, Tax payer and registered voter, April 20, 2024

Comments: *Submitted electronically.*

Thank you for ensuring my child will not graduate. It is not possible for me to get him to "volunteer opportunities". I work an hour away from where I live my son works with a nearby place on the weekends. His stepdad is an over the road truck driver. His biological father has stepped out of his life so no support. The school he attends is useless as far as finding activities to volunteer they just say he has to have 15 hours this year.

In our blended family of 10 boys he is 9/10 and will be the first to not graduate. As a mom, a former educator and a person barely making it in the current economy, I beg you to get your head out of your ass and remove the "volunteer" requirements.

If my child who comes from a middle class two parent working home is in danger of failure, then it stands to reason the low income families, single parent families and those parents working multiple jobs to survive will be damaged by the "looks good on paper" law.

Just know that you are actually going to cause the graduation rates to plummet and harm these kids. I am looking into if this ignorant, poorly thought out "well intended", looks good on paper policy will apply if I home school my two remaining children.

Please stop the madness and get this required "VOLUNTEER" time off the books.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Douglas Highsmith, April 20, 2024

Comments: *Submitted electronically.*

I'm in support of the community service hours requirement.

Education should reach beyond the distribution of knowledge, and in fact does, to a certain extent. We teach children to behave, to be respectful, to follow rules and meet deadlines. We teach them good dietary habits and proper hygiene. We teach them perseverance and persistence. This is all done in the public school and there's not one class that has the specific objective of teaching these skills. With the advent of homeschooling and remote learning, these intangible skills are the true value of our public education system.

Interconnectedness is a vital aspect of being a productive member of society. In my opinion, this is what community service teaches our children. We should look for opportunities to help one another and serve one another and we should teach this to our children. What is the ultimate aim of the public education system? To build a productive society. The requirement furthers that aim.

My child is 12. She frequently tells me she doesn't want to do anything. She doesn't want to go outside, she doesn't want to do anything resembling physical labor, she doesn't want to spend time with her family. I'm sure she's sincere in expressing these desires but that does not mean that capitulating to them is good, healthy or right. As her parent, part of my responsibility is to guide her past her this difficult time of her life into a time more fulfilling, a time which I know exists and she does not.

Our public educators have been entrusted with guiding our children to fulfilling lives. They have knowledge and skills that are beyond what the general public has. Provided that they have the proper goal of creating a fulfilling society in mind, we, the general public, should be supportive of innovative efforts to reach that goal.

Because, after all, continuing to do the same thing and expecting better results is not just insanity, it's stupid.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: John Unger, West Fork School District, Interim Superintendent, April 19, 2024

Comments: *Submitted electronically.*

Community Service

2.00 - There is not a definition of “community service.”

3.02.3.2 - This seems excessive to mandate on schools and ultimately restricts parents and students. This will limit rather than promote service.

4.01 - Please ensure the Class of 2027 and beyond will benefit from the 1.0 elective academic credit. By keeping this credit on our student transcripts we are showing potential college admissions that our students have the community service that colleges want students to have. Parents want to know why we would mandate 75 hours of community service and not get a credit.

Division Response: **Comment considered; substantive changes were made after the first public comment period. No additional changes were made.**

Commenter Name: David Olin Tullis, April 19, 2024

Comments: *Submitted electronically.*

REQUIRED Community Service is a punishment forced upon certain individuals as punishment for criminal offenses. Being a high school student is not a criminal act and students should not be punished for it.

VOLUNTARY Community Service is a wonderful thing that people of all ages can CHOOSE to do - for their own personal fulfillment and/or the good of their community.

Altruistic behavior should never be a forced punishment.

Division Response: **Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.**

Commenter Name: Denyce Glover, Parent/ Stakeholder, April 17, 2024

Comments: *Submitted electronically.*

Dear Community Service Rules Committee;

This rule is presented in close proximity to the policy of community parole and probation services. What priority for excellence in literacy success has been placed on this type of rule by law?

Who keeps believing many communities are safe for any of us, let alone our children? Regardless of the innocence while being in a community environment **there is ever present danger**, more than ever especially against children. In times like these children have been hurt, harmed, maimed, killed, violated, kidnapped, runaway and or missing. It happens at the hospital, the mall, a store, on a playground, attending an entertainment venue, a birthday party, going to or being at school, picnics, ball games, parks, in your own community, at your own house and or yard.

What is the alternative to releasing our children into community settings, only while on school property and only under the supervision of school personnel? Where are the believers of Heavenly Father God? Believers by the Grace of Father God you are being granted success and position. Did you forget the purpose of God and HIS Glory is to advance his kingdom to come, as you sit your positions? Believers, have you forgotten your blessings are to flow through you to others? Believers have you forgot that your indwelling of Heavenly Father God's light is to shine like a beacon on a hill among all darkness? Father God in heaven created a car to drive. When that car does not start or drive, it is useless. You, me everyone and everything all belong to Father God in H e a v e n .

Are you rejecting, ignoring or have you just been missing God's kingdom opportunities? These reminders are for those not activated in true purpose. Father God in Heaven and you know who you are.

Believers on our best day we are all still sinners saved by Grace yet to serve unto God be the Glory and help save others. Believers why haven't you made a stand boldly proclaiming enough is enough about systematic harm against children.? If not for the Grace and goodness of Heavenly Father above believers, where would you be? No one is blessed or elevated to success in life for selfness gain and your own sake. You were created to do what your creator placed in you to do. You will be held to a higher court and accountable to Father God in Heaven. You will be given back what you gave or not for the sake care and safety of saving children.

Who has concerns that a school environment is no longer the arch of safety? Who keeps misunderstanding our children are ALWAYS safe in the hands of ALL school educators, staff etc.?

In times like these educators, school staff etc. have been widely and openly reported being arrested, fired, sweep traumatic activity under the rug, jailed, imprisoned for (i.e.) human trafficking of children, sexual violations against children and abusing children (**this is just some of what our children currently face while being at school**).

Who believes when our children are leaving out going to school, there is 100% comfort from most parents and families?

This partnership must be lucrative between law and education. Notice also it furthers the advance their overreach beyond parental involvement, consent and care. There is too much going wrong against our children from and within systems.

Who keeps trusting that systems takes better care of our children more than most parents who love and care for their child? That's a disconnect from reality.

Who keeps activating agendas assuming privileges to do as you wish with our children anytime you get ready?

When did it become trendy for systems to disregard parental acknowledgment, consent and input all while ignoring valid concerns ?

Why are our children's "supposed" well-being readily compromised, especially when there is a benefit, funding, etc. for systems ?

Here they go again. Another decision already made. The partners are commanding that our children will go off school property, only with school personnel, for 75 hours of community service. **WHO will be responsible out there when something does happen? Certainly not the parents, correct?** Truth is the presentation of this law, reeks as when the "activity" isn't completed, it becomes **punishable by law** thus not receiving a diploma. What is that? A high school diploma is certainly required for success in life. Is this part of those ethical standards written and as you say you care so much for our children and operate in? **WHY** you would set a child up for failure in life by penalizing them withholding a high school diploma for this? Does that sound like the devoted professionals that you wrote about in your leadership values? Does that come off as it sounds, that our children become criminals?

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Holly Howard, April 16, 2024

Comments: *Submitted electronically.*

Recommendation 1:

2.0: Please include community service in the definition. It was previously defined in a commissioner’s memo (COM-42-021 of 8/30/2023) as “activities carried about by individual students or groups of students to enhance and contribute to their local community. This definition is essential to the purpose and the implementation of the requirement but does not appear in the official rules.

2.04 and 4.02: In the same commissioner’s memo as mentioned above, it states that school boards will approve community service organizations; “However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.”

Can the language be clarified to include parental control over where a student serves community service? The way this rule is written eliminates parental autonomy over where, when, and how students meet this service requirement. Parents should follow the same consideration of safety guidelines when choosing organizations.

3.02.3.2: The rules state that public schools should address safety of students including “providing training, equipment or both.” This wording does not provide specific guidance on what districts are actually responsible for providing.

4.01: This rule removes the elective academic credit opportunity for community service beginning with the class of 2025-2026. This elective academic credit has been in place since 1993. Currently, this credit is the only way for community service to appear on a student’s transcript. This credit awards them the recognition and benefits students in the college application process. Families are very concerned that this credit, according to the rules, will now longer be available to students, even though they are meeting extensive community service requirements.

Division Response: Comment considered; substantive changes were made after the first public comment period. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Liz Bland, Fayetteville High School, Volunteer Coordinator, April 16, 2024

Comments: *Submitted electronically.*

Good morning,

Magan Randall and I are the Volunteer Coordinators at Fayetteville High School and have been working closely with our 9th grade students this year on the new community service graduation requirement.

I have attached some questions and comments that we have regarding the proposed community service guidelines. If you would like to further discuss any of these or get clarification, please feel free to call us at

FHS QUESTIONS FOR ADE PUBLIC COMMENT

WAIVERS

1. Should waivers be submitted each year for the prorated amount (9th grade - 15 hours; 10th, 11th, and 12th grades - 20 hours)? Or once for a full exemption of all 75 hours?
 - a. If one waiver is submitted for all 75 hours, should that be submitted when the circumstance is known to the district (as early as 9th grade year) or wait to be submitted senior year in case personal circumstances change? (ex: family is no longer homeless or homebound student recovers from illness)
2. Will there be a uniform "State of Arkansas" waiver or should each district create their own?

SAFETY

3. In section 2.04, it states that partnering organizations include but are not limited to 501(c)(3) nonprofit entities. If all 501(c)(3) organizations are approved partners by the state, what is the district's responsibility in ensuring student safety at these locations to meet the expectations set in 3.02?
 - a. District shall "Ensure student safety and privacy, which may include background checks and ethical conduct protocols and provide any necessary equipment, training, or both."
4. Can we assume that all 501(c)(3) organizations are considered safe and meet these expectations if they have this federal designation? If not and schools are expected to vet each non-profit individually, this will put a large undue burden on the schools and limit the options for students to complete this requirement.
5. If schools are required to vet each 501(c)(3) individually, what will that process look like? Will there be a standard questionnaire? Will it require a site visit?
6. If a student sets up their own individual community service on their own under parent supervision, is the school still responsible for ensuring their safety and

privacy?

DOCUMENTATION AND TRANSFERS

7. Is the Arkansas electronic transcript system up and ready to be used next month so we can input community service hours for this school year? If not, what is the timeline?
8. Are schools expected to input hours into this system yearly or only once at the end of senior year?
9. When will the deadline be to input student hours into the system? (June 1, August 1, etc)
10. How will schools be notified of student community service hours when students transfer mid-year between Arkansas schools if we only input hours once a year? Example: Student A attends Elkins High School and transfers to Fayetteville High School in October. He had already earned and documented 9 community service hours with Elkins before he transferred. How will Fayetteville know this if we only input hours at the end of the school year or senior year of high school? Will there be a uniform system of documentation?

COMMUNITY SERVICE CREDIT

11. Section 4.01 states that students who complete the 75 hours “shall be *eligible* to receive one (1) academic credit that *may* be applied toward graduation.” This sounds like it is optional. Will the decision to award this credit be left up to the discretion of the school districts? If so, this seems like it could lead to inequality between schools and districts.
12. Will students who received a waiver still be eligible for the community service credit? Will students who transfer into a school and have hours prorated be eligible for the community service credit?

SPECIAL CIRCUMSTANCES

13. Some students are enrolled in public school but have alternate learning settings. Will these students be required to earn all 75 hours?
 - a. Homebound students
 - b. Students in Juvenile Detention Center (JDC)
 - c. Students in Alternate Learning Environments (ALE) - example night school, alternative school, etc.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Jennifer Morrow, April 15, 2024

Comments: *Submitted electronically.*

Please allow parents more rights to choose where a student can complete community service. The language published in COM 24-021 of 8/30/2023 protected these rights this year: “However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.” This is good language the ADE published in August. Parents should not be at the mercy of local school board approval only. Service work with religious organizations and various community groups may not always be recognized by a school board. Please preserve our religious freedom for community service selection.

The 1.0 academic credit should be added to the new rules and given to students who are now required to complete the 75 hours of service. This credit has been part of the optional program in the past. While the new law requires the optional system to end, the law does not keep you from preserving the credit in the new rules. This is the only way to get the words "community service" on the academic transcript and that is beneficial to my 15-year-old in college admissions and scholarship applications.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Aaron Randolph, Cabot School District, Asst. Superintendent, April 15, 2024

Comments: *Submitted electronically.*

–Section 3.02.2.1 (p. 2) requires students to do “preparation, action, and reflection components.” Is this a written assignment? Can it be waived or modified for students with IEPs and 504s?

–As for section 3.02.3.1 (p. 2), districts are not capable of ensuring “student safety and privacy” at locations that are not on school property and possibly even out of the state of Arkansas, which is allowed by section 3.02.1 (p. 2). Additionally, we are unable to ensure that those

employed by or also volunteering with the program are safe because we would not be able to do background checks. (3.02.3.1, p. 2). Finally, the district is not best situated to provide training on “ethical conduct protocols” with outside agencies and programs. (3.02.3.1, p. 2)

–If districts are required to provide necessary training, equipment, or both (3.02.3.2, p. 2), it will severely limit the opportunities for students because we are not provided funding for this.

Districts may not have the training necessary to train students in areas that are needed.

–Section 3.04 (p. 2) states that the school board can waive this requirement. Are the only options to waive it in full or could they waive it in part by reducing the number of hours? Can they wait to ask for a waiver just before graduation or should the waiver be requested at a certain time?

–Section 3.04.1 (p. 2-3) allows the student and family to petition the board for a waiver in writing and it should be taken up “at its next board meeting” (3.04.1.1, p. 3). It should only be heard at the next regular school board meeting in case there are special meetings called in the interim.

Additionally, there should be a time period noted where a request must be received a certain number of days before the next board meeting or else it will be heard at the subsequent meeting. Finally, there is no description for what this hearing should look like or how it should be conducted.

–Section 4.02 (p. 3) states that, for credit, “community service shall be in programs or activities approved by the local school district board of directors.” The school board is in an impossible situation when asked to approve programs and activities where it ensures that students will be kept safe and private.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Charlsie Wisdom, Teacher, Farmington School District, April 14, 2024

Comments: *Submitted electronically.*

I am currently an Arkansas public school teacher and have been for 20+ years.

I have several comments, questions, and concerns and would like clarity after reading through the Commissioner's Memo COM-24-091.

Community Service

2.00 - Community Service is not included in the definitions.

Please include a definition in the rules.

3.02.3 When designing community service programs or activities, a public school district shall explicitly address student safety and ensure that any partnering organization has the infrastructure to accommodate students, including that the partnering organization an:

3.02.3.1 Ensure student safety and privacy, which may include background checks and ethical conduct protocols; and

3.02.3.2 Provide any necessary equipment, training, or both.

How can schools be held responsible for safety when realistically, background checks cannot be performed on every volunteer service program.

How can schools be held accountable when school staff members do not have to be present during the volunteer hours?

Please be clear and concise when defining "ensure student safety and privacy"

Thank you for allowing comments addressing the Commissioner's Memo COM-24-091

Charlsie Wisdom, Farmington School District

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Jonathon Guthrie, Bentonville School District, Principal, April 11, 2024

Comments: *Submitted electronically.*

Regarding Community Service Learning: Please revert the language in the rules to reflect what was in there previously. Allowing parents to approve the locations their children serve helps engage parents with this requirement and assists districts in expediting the documentation of the student hours.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Kimberly Starr, Fort Smith Public Schools, Director of Elementary Education, April 11, 2024

Comments: *Submitted electronically.*

3.05.1–What will this look like in student transcripts? Will there be some sort of drop down or documentation required?

4.03 –CSL–Should this be a statewide system provided by the state?

3.02.3.2 - What does this mean? This seems like a lot of stress on schools and it seems to restricts parents and students.

Division Response: **Comment considered; no changes made.**

Commenter Name: Sally Lybrand, April 11, 2024

Comments: *Submitted electronically.*

3.02.2.1 The school district policy in Section 3.02.2 must: (a) require an adult to sign off on the student’s community service hours; (b) be posted on the school district’s website; and (c) include preparation, action, and reflection components required for a student to receive community service credit. How will part C be rolled out? Is the state going to provide a form with this component to ensure it is being fairly administered? Why is a signature of service completion not sufficient?

2.01 “Public school” and “public school district” includes a traditional public school district or an open-enrollment public charter school. If any private or charter school receives state-funded vouchers or any form of state support, their students should be subject to the same community service graduation requirement.

3.02.3.1 Ensure student safety and privacy, which may include background checks and ethical conduct protocols; How is the school supposed to ensure that those involved in the partnering organization have clear background checks? Not all partnering organizations require their own employees or workers to pass background checks.

3.04 A public school district board of directors or the governing body of an open enrollment public charter school may grant a waiver of this requirement for extenuating circumstances on a case-by-case basis. Students living in rural areas with little to no opportunities for “official service” should receive special consideration in this waiver. The whole requirement should be dropped as it creates undue burdens on students, families, and schools and could negatively impact graduation rates over a component that has no academic basis or value for students. Offering an award upon graduation or even a scholarship for service hours would be more approachable and appropriate instead of threatening graduation.

3.04.2.4 Notice to the public school district board of directors if the student is a major contributor to family income. Students who work at all should be exempt from this requirement. Informing the school board that a student is a major contributor to family income is a borderline privacy invasion when board meetings must be public record and must be recorded.

This seems like an attempt to harm smaller, more rural schools who do have good graduation rates by finding a way to bring down that rate, which in turn would decrease that school's overall state report card grade, which is tied to funding, unnecessary scrutiny, etc. It is far more difficult for those students to perform community service than for those with access to more opportunities to serve. It is clear that "community service" in this context does not apply to helping neighbors or the elderly with light yard work or picking up trash unless it is for an approved "organization." This is an inequitable requirement that does not consider the nuances and obstacles that smaller, rural schools must face. These are schools that comprise a great deal of the Arkansas Public School System. Presenting more barriers to graduation for students who struggle will not foster a love of community service, and harming these schools by imposing these barriers to graduation jeopardizes the very thing that keeps these rural areas afloat: Their public school.

4.02 The community service shall be in programs or activities approved by the local school district board of directors and shall include preparation, action, and reflection components that may occur in or out of school campuses and during or after school hours. Allowing students time out of classes to complete service hours for graduation seems counterproductive when the goal is to first educate students. And in no way should students ever be expected to give up their lunch time to complete hours if class time can't be sacrificed. There is no situation in which the student "wins" here. This is truly not a student-focused initiative.

Division Response: Comment considered; substantive changes were made after the first public comment period. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Jennifer Van Slooten, April 8, 2024

Comments: *Submitted electronically.*

To Whom It May Concern,

I am a parent with a child attending Bentonville High School and I have the following suggestions for the draft rules.

- 1) further define what is considered community service.
- 2) Simplify the system of approval for organizations by allowing the parent to verify the organization to be served and confirm the work was completed.

Thank you, Jennifer Van Slooten

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Jennifer Morrow, Bentonville School District, Executive Director of Secondary Schools, April 8, 2024

Comments: *Submitted electronically.*

AR Learns promised flexibility for parents. Can the language published in COM 24-021 of 8/30/2023 be added to these new draft rules? “However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.” This language allowed us to preserve a parent's right to choose where a student serves.

The 1.0 academic credit has not been explicitly included in the new rules and extended to students who are now required to complete the 75 hours of service. This credit has been part of the optional program since 1993. While the new law required the optional system to end, the law does not specify that academic credit and notation on the transcript could not be preserved in the new rules. This is the only way to get the words "community service" on the academic transcript and that is beneficial to students.

Division Response: The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Anne Martfeld, Pea Ridge School District, Assistant Superintendent, April 8, 2024

Comments: *Submitted electronically.*

2.00 - Community Service is not included in the definitions. It was previously defined in COM-24-021 of 8/30/2023 as “activities carried out by individual students or groups of students to enhance and contribute to their local community.” Please include this or some definition in the rules.

2.04 & 4.02 - COM-24-021 released on 8/30/23 alleviated this board approval: “However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.” Can that language be clarified in the rules to preserve the rights of parents? Parents' rights should prevail. Preserve a parent’s right to choose where a student completes community service. Parents need to be able to decide where a student serves. Parents should lead, guide, and direct this closely with safety guidelines from the state and local schools. School boards (state or local) should not approve a list of organizations for service. Parents have been restricted by this list historically.

3.02.3.2 - What does this mean? This seems excessive to mandate on schools and ultimately restricts parents and students. This will ultimately limit rather than promote service.

4.01 - Please ensure the Class of 2027 and beyond may benefit from the 1.0 elective academic credit and course code 496010 as allowed since 1993. While the AR LEARNS Act sunsets the optional program it does not preclude DESE from extending credit to the Class of 2027 and beyond in the new, required program. This is currently the only way to get “community service” on your transcript and that benefits our students in the college admissions process. Families want to know why we would stop giving credit to the students who are now required to do this.

Division Response: Comment considered; substantive changes were made after the first public comment period to sections 2.0. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Kristen Carter, April 6, 2024

Comments: *Submitted electronically.*

As a parent, it greatly upsets me that the school board, the school, etc. would have to manage the community service hours for students. They do not have the resources to do this! My husband and I, as the parents, should be able to approve where our students perform their volunteer hours. My student who is in the Class of 2027 already has her hours for this year, because I helped her find volunteer opportunities, not because the school chose those opportunities for her. She was able to complete some hours at school because some of the teachers came up with options, but that puts so much extra work on them when they already have so much on their plates as it is.

2.00 - Community Service is not included in the definitions. It was previously defined in COM-24-021 of 8/30/2023 as “activities carried out by individual students or groups of students to enhance and contribute to their local community.” Please include this or some definition in the rules.

2.04 & 4.02 - COM-24-021 released on 8/30/23 alleviated this board approval: “However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.” Can that language be clarified in the rules to preserve the rights of parents? Parents' rights should prevail. Preserve a parent’s right to choose where a student completes community service. Parents need to be able to decide where a student serves. Parents should lead, guide, and direct this closely with safety guidelines from the state and local schools. School boards (state or local) should not approve a list of organizations for service. Parents have been restricted by this list historically.

3.02.3.2 - What does this mean? This seems excessive to mandate on schools and ultimately restricts parents and students. This will ultimately limit rather than promote service.

4.01 - Please ensure the Class of 2027 and beyond may benefit from the 1.0 elective academic credit and course code 496010 as allowed since 1993. While the AR LEARNS Act sunsets the optional program it does not preclude DESE from extending credit to the Class of 2027 and beyond in the new, required program. This is currently the only way to get “community service” on your transcript and that benefits our students in the college admissions process. Families want to know why we would stop giving credit to the students who are now required to do this.

Division Response: Comment considered; substantive changes were made after the first public comment period to sections 2.0. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Michelle Canode, April 5, 2024

Comments: *Submitted electronically.*

Please consider the below before approving if the changes.

Community Service

2.00 - Community Service is not included in the definitions. It was previously defined in COM-24-021 of 8/30/2023 as “*activities carried out by individual students or groups of students to enhance and contribute to their local community.*” Please include this or some definition in the rules.

2.04 & 4.02 - COM-24-021 released on 8/30/23 alleviated this board approval: “*However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.*” Can that language be clarified in the rules to preserve the rights of parents? Parents' rights should prevail. Preserve a parent’s right to choose where a student completes community service. Parents need to be able to decide where a student serves. Parents should lead, guide, and direct this closely with safety guidelines from the state and local schools. School boards (state or local) should not approve a list of organizations for service. Parents have been restricted by this list historically.

3.02.3.2 - What does this mean? This seems excessive to mandate on schools and ultimately restricts parents and students. This will ultimately limit rather than promote service.

4.01 - Please ensure the Class of 2027 and beyond may benefit from the 1.0 elective academic credit and course code 496010 as allowed since 1993. While the AR LEARNS Act sunsets the optional program it does not preclude DESE from extending credit to the Class of 2027 and beyond in the new, required program. This is currently the only way to get “community service” on your transcript and that benefits our students in the college admissions process. Families want to know why we would stop giving credit to the students who are now required to do this.

Division Response: Comment considered; substantive changes were made after the first public comment period to sections 2.0. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Jon Laffoon, Farmington School District, Superintendent, April 4, 2024

Comments: *Submitted electronically.*

3.02.2.1- Can the district require an adult (parent/guardian) and the principal to sign off on the required community service?

3.02.3- How can the district be held accountable for the student safety at a 3rd party organization without background checks being required in the law?

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Patrick Stair, April 3, 2024

Comments: *Submitted electronically.*

While I like the idea of requiring public service in order to graduate with a high-school diploma in Arkansas, I don't understand why this requirement apparently applies only to public school students. I think it should apply to every high-school student in Arkansas. At the very least, it should apply to every student who receives a voucher or other subsidy to attend a private high school, in addition to applying to public school students.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Debbie Jones, Bentonville Schools, Superintendent, April 2, 2024

Comments: *Submitted electronically.*

2.00 - Community Service is not included in the definitions. It was previously defined in COM-24-021 of 8/30/2023 as “activities carried out by individual students or groups of students

to enhance and contribute to their local community.” Please include this or some definition in the rules.

2.04 & 4.02 The rule as written requires school board approval for partner organizations.

Can that language be clarified in the rules to preserve the rights of parents? Preserve a parent’s right to choose where a student completes community service. Parents need to be able to decide where a student serves. Parents should lead, guide, and direct this closely with safety guidelines from the state and local schools. School boards (state or local) should not approve a list of organizations for service. Parents have been restricted by this list historically.

3.02.3.1 The Districts cannot fulfill as written to “ensure student safety and privacy, which may include background checks.” Districts do not have the personnel to manage background checks for partner organizations nor do we have the resources to manage after hours community service partners to ensure safety. We can develop guidelines but that should be DESE’s responsibility.

3.02.3.2 - Districts should not be required to “Provide any necessary equipment, training or both.” This will ultimately limit rather than promote service. Districts have not been provided additional funds to purchase items for community service.

4.01 - Please ensure the Class of 2027 and beyond may benefit from the 1.0 elective academic credit and course code 496010 as allowed since 1993. While the AR LEARNS Act sunsets the optional program it does not preclude DESE from extending credit to the Class of 2027 and beyond in the new, required program. This is currently the only way to get “community service” on your transcript and that benefits our students in the college admissions process. Families want to know why we would stop giving credit to the students who are now required to do this.

Division Response: Comment considered; substantive changes were made after the first public comment period.

Commenter Name: Shawn Quinlan, Bentonville Schools, Curriculum Specialist, literacy Grades 9-12, April 2, 2024

Comments: *Submitted electronically.*

"Community service" should be defined in section 2.00. With so many interpretations and recent variations in our state, from volunteerism to service learning, it is imperative that we operationalize the definition of what is expected. Parents should be able to decide for their student where the student completes their service. When school boards (state or local) approve a list of organizations, student opportunities are limited and parental discretion is often removed. How can we add language that preserves the rights of parents?

Section 3.02.3 (including 3.02.3.1 and 3.02.3.2): student safety is paramount; however, this is excessive. How will any charitable organization possibly be able to comply with these kinds of requirements? These rules will restrict service opportunities. Why are we removing the

opportunity for students to earn an elective credit through the completion of service learning in Section 4.01? Many students benefit from having community service specifically listed on their transcript, and this would help to set Arkansas students apart in the college admissions process. Please preserve community service course credit (course code 496010) for all Arkansas students who meet this new community service requirement.

Division Response: Comment considered; substantive changes were made after the first public comment period.

Commenter Name: Carissia Gilmer, March 30, 2024

Comments: *Submitted electronically.*

I believe it is good to be involved in volunteer programs. It's a joy to be involved in something you don't get paid for, but that you can reap a personal satisfaction from by participating and helping one another. However, I believe it should be voluntary and not mandatory. If a school club wants to volunteer for a service, or if your church or extracurricular program wants to spend time volunteering, I think it's wonderful. It should not be for a graduation credit, but in free will you choose to do this. Is forcing volunteer hours even volunteering? I thought the Republican Party was more about deregulating and less about mandating.

In my opinion, mandating volunteer hours is counterproductive and is not in the true spirit of what volunteering is about.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jim Warnock, Ozark Mountain Hiker, Blogger, March 24, 2024

Comments: *Submitted electronically.*

While I think community service is good for young people and any citizen, I do have concerns about the implementation of this as a requirement.

1. 75 hour req. will be a logistical challenge for school personnel to facilitate and track accurately for all of their students. If these tasks are assigned to staff, we're repeating the age old practice of adding responsibilities without additional funding. It sounds good on paper but implementation with fidelity is not doable.
2. It places schools and the Arkansas Dept. of Ed. in the awkward position of telling students they will not graduate because they are short on the required 75 hours or they'll give students a pass and teach them that requirements are not required.

3. Community groups and churches provide avenues for public service and students should be encouraged to serve but we should not place the responsibility for making this happen on our schools that are already struggling to teach basic and advanced skills.
4. It seems likely that private schools will not have to comply with this state requirement. They should have to comply if it demanded of public schools.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jasmine McIntosh, March 22, 2024

Comments: *Submitted electronically.*

Most families can't get their children to community service and meet 75 hours of service. They are barely getting them to school. Is there going to be transportation provided by gov. to make sure minorities meet their needs? It is unfair that minorities are suffering. Every chance gov. gets. They put more pressure on minorities. When are our children going to be covered and considered in policies? The policies that are being put in place are not for minority to thrive. But to fail. Have every one considered giving minorities boys and girls club back? Places they can go to stay out of trouble. Build our schools back up. Instead of building more prisons systems. If the minority had something to believe end and someone to believe in them. Change would come!

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jessica Saum, Teacher, March 22, 2024

Comments: *Submitted electronically.*

While section 3.05.1 addresses the process for requesting a waiver, it is 3.05.2.2 detailing extenuating circumstances that I have concerns in regards to the wording.

As many of you know from my time as the 2022 Arkansas Teacher of the Year, I am a special educator who is passionate about supporting our exceptional learners and ensuring high expectations for all students. Arkansas and DESE Special Education Office have spent tpast few years traveling the state to prepare administrators and educators for implementing inclusive practices for students who receive special education services, including educating districts to changes in requirements for graduation for these students in order to be in compliance with IDEA and ESSA. On top of compliance, we know having high expectations for all students and maintaining the least dangerous assumption- that all students can learn at high levels when

educators provide the appropriate supports students need to be successful, is critical to improving outcomes for all learners. Arkansas' students deserve for us to assume that they can achieve.

In stating that extenuating circumstances include a student who is medically fragile or has a disability under the IDEA, negates so much of the work that has been done to change the mindset around special education in our state. I fully support waiver considerations for our state's students with the most complex needs or those who are medically fragile, if their caregivers and educators feel this is necessary. We must of course consider students individually and determine what is possible based on their needs and abilities, however the wording "has a disability under IDEA" should be removed from this section of the rules. We know that the vast majority of all special education-eligible students do not have a cognitive disability and their disability is not correlated to IQ in any way, with 80% or more of these student having an average IQ. Simply having a disability under IDEA does not mean a child should be considered for a waiver to complete the community service hours for graduation.

Please let me emphasize the need for the rules to include language for a waiver for our students with the most complex needs and those that are medically fragile, this consideration is necessary and should be allowed, but please also consider what the language of "has a disability under IDEA" insinuates. Students who receive special education services are often fighting an uphill battle against the weight of low expectations from an early age, and when we focus on what cannot happen or what they cannot do, we are putting limitations on a student and their family's ability to dream. Our students deserve better.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Joyce Butler, March 22, 2024

Comments: *Submitted electronically.*

Since the public schools are being required to do this, what assistance is the school system going to do in providing for this? Since LEARNS ACT is providing public money to those who go to private schools aren't private schools going to have to do the same. Public money is public money no matter where you get educated at and the rules for volunteering to get a diploma she be the same no matter where you go. It's not fair to the kids in public school to be forced to do something private schools are not being forced to do. Don't say you don't govern the rules in private schools. If you are giving public money to send students to private schools, the state has a say in their operation. If the private school doesn't want the state in their business, stop giving them money.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Brookelyn Mitchell, University of Virginia, Student, March 21, 2024

Comments: *Submitted electronically.*

My name is Brookelyn Mitchell, and I am currently a third year at the University of Virginia. I still live in Cabot, AR during majority of the year, and I graduated from Cabot High School in 2021.

I am writing to you today to express my lack of support for the community service requirement of graduating classes from public schools. Although I acknowledge the benefits of a community engagement focused curriculum, community service in its purest form is a voluntary choice for people to help their community. Mandatory community service takes away from the meaning of it as a whole; if someone is forced to engage in community service, there's a strong likelihood they will resent the requirement and not want to continue serving the community later on. I am an extremely loud advocate for community service and self-governance, however, the beauty of it is that people do it voluntarily. People who CHOOSE to show up and volunteer will put in their best effort compared to someone who is FORCED to in order to graduate. Organizations seeking volunteers want students who WANT to be there out of the goodness of their hearts, because if not, the jobs needing to be done won't be done efficiently by those only there for a requirement.

Also, I feel as though this requirement is discriminatory for disadvantaged and underrepresented communities, as many limited income students cannot afford to volunteer for free. As a first generation, limited income student myself, I work 3 jobs at once to make ends meet while taking a large course load, and there simply is no time to go out into the community and volunteer with an organization. My financial status restricts me from serving the community outside of my University, and I know there are limited income students in high school who are in the exact same boat as me.

There are several externalities that would also cause many obstacles for students if this were to be required. What transportation would students receive to their volunteering opportunities? How many opportunities are even available for students to volunteer? What happens if there's not enough hours for everyone? What happens if a student can't reach the minimum amount to graduate because they had to work? Had to take care of an ill family member? What happens if students fail to do their homework because they were busy with volunteering? What happens when students who need jobs can no longer obtain one because businesses have resorted to only using volunteers? There are many scenarios to think about if this requirement were to be implemented.

I implore you to think deeply about the students who would be most impacted by this requirement. It is not the star athletes; it is not the homecoming queens; it is not honor roll students; it is not the students who come from two parent households. This requirement would most negatively impact marginalized students who have to work to provide for their families. I

would be happy to elaborate on my response or meet with whoever I need to, to ensure that FGLI students like me are not facing even more obstacles than they already are. Until all inequities within public schools are addressed, there is no need to add another. Thank you.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Teresa Swint, El Dorado Schools, Former School Board Member, March 21, 2024

Comments: *Submitted electronically.*

I am opposed to this rule for graduation. Students have way too many activities and academic requirements right now without adding this requirement. If you take the time out of the school day you are replacing valuable learning time. Would not be possible for some students to participate after school and if you did, should count towards the hours required for students like when making up snow days. Community Service is required for a lot of clubs so opportunities already exist. Bad idea all the way around.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Carl Davis, March 21, 2024

Comments: *Submitted electronically.*

I am not sure you can legally mandate someone to perform community service. I think it's a good idea to volunteer, however I do not like the government telling the people they have to volunteer.

What about students who are holding down a job? What about students that do not have transportation (other than a school bus)? What about the disabled? Who defines what community service constitutes? Doing yard work for a neighbor? What if someone wants to do community service for their religion and the school board doesn't like that?

Have you talked to the attorney general or a state judge? I would be very careful, this looks like something that could get dragged out in court and cause a lot of needless spending of tax dollars to lawyers and the courts.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Avonia Durby, LMSW, March 21, 2024

Comments: *Submitted electronically.*

I am writing this letter as a tax paying citizen of this great state and a parent of a public high school student. My child attends a high school in Northwest Arkansas and is privileged to continue to receive the best education this state has to offer. I believe community service is a great tool every person should encompass in life; however my questions are in regards to the state mandating this requirement while dismissing others. 1. Will the required community service hours requirement be a requirement for private schools? What about children that live in rural areas and limited access to community services? 2. Why is the state not requiring a foreign language to graduate high school when colleges require this to graduate? 3. Why are we pushing computer programming when all of these students are technologically advanced? 4. AMI days? If the board of education is truly about local control; why are the rules different for private schools? Schools in the same area (NWA can use AMI days and others cannot? Shiloh Christian can use AMI days yet Springdale Public Schools cannot? Is the weather not different in the same city? 5. Again back to local control, why are we trying to police education? Meaning, we are deciding what courses districts can and cannot teach (AP African American Studies, yet we have AP World History), censorship of library books and decreasing academic freedom. Finally, If we are completely honest with ourselves; our education system is becoming two tiered. You are taking money from public schools, keep moving the goalposts. However, you allow more leniency with private schools, do not require them to provide special education services (that is the public schools mandate to educate all) and allow AMI days. Do you have all of the children's best interest or the best interest of those who are affluent?

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Michelle Scales, March 21, 2024

Comments: *Submitted electronically.*

While yes community service is good, I struggled to find community service for my college which is a requirement I. My son does not drive we live in a small town and most of our community service is done as a punishment for crimes. This should not be a requirement for high

school when most small towns don't have the resources, parents work two jobs to put food and keep a roof over their head, or they don't own a car and there is no transportation. Will The Board of Education provide this? If not then what an inflex of GED cause they can't compete the requirements. We need skills taught in our schools that can be used in today's world, like how to do taxes, balance a check book, jobs that are available. Cause our small town we have a bank a grocery store a hardware store a auto part store DQ and Sonic besides LTC facility and a small hospital that is now being bought by a bigger city hospital cause well they couldn't pay their bills , oh yeah the police station and court house besides 2 churches. The food bank is what prisoners do every Thursday. So tell me what he can do. Oh yeah I b work and attend college so I have 1 day home, he does not drive at this time not that he don't want too just I can't teach him so he could go to bigger towns for this requirement. If you are not from a small town go live in 1 for a while and them let's talk about this requirement after oh yeah you gotta live outside of the town with no car too let's see you do this.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Mary Scarlett Jones, Licensed Social Worker, March 21, 2024

Comments: *Submitted electronically.*

My name is Mary Scarlett Jones. I am a Licensed Medical Social Worker, and I agree with the new proposed requirement for high school students to complete 75-100 hours of community service as a graduation requirement.

As someone who personally completed over 400 hours of community service throughout high school, I believe this is an important and manageable requirement that can provide students with experiences, skills, and future job opportunities that are useful in life during college and throughout their careers. I personally benefited from developing the skills of critical thinking, utilizing my communication skills to advocate for organ donation in Arkansas, learned about national and international medical policies and laws that impact organ transplantation, and interpersonal skills through sharing my story and answering the general public's questions about the organ donation process, ethics, religious considerations, and medical policies regarding transplants. I know for sure today I wouldn't be a medical social worker if it hadn't been for my community service experiences. It even lead me to a job offer out of college working with the Arkansas Regional Organ Recovery Agency. I believe it is fundamental and important.

Division Response: Comment Considered; no changes made.

Commenter Name: Lindsey Cobb, March 20, 2024

Comments: *Submitted electronically.*

To whom it may concern regarding the 75 volunteer hours, I have very strong feelings about this. Asking every child in Arkansas to get 75 volunteer hours is too much. I have well rounded middle class kids who are very involved in a lot of things and my husband and I have flexible schedules. Our kids go to school, play sports, have after school responsibilities and homework like most high school students. They also like to have a little free time to breathe. They volunteer here and there throughout the year but will get most of their hours from a summer camp. We are very involved with about 7 other boys my son goes to school with. They are raised by single hardworking moms (some of whom have multiple jobs), some struggle to even have food at their homes, they are taking care of their younger siblings, struggling in their classes, they don't have cars, etc... These kids are not going to be able to get their hours. Some of their families are barely making it. No one is going to take them to get volunteer hours. To take away graduation from them because they can't get 75 hours volunteering would be the worst possible thing to happen to them. How will they get a job? How will they break the cycle? This milestone in their life is something they can be proud of and feel accomplished. A high school diploma might be the pinnacle moment of their life. The school counselors are trying hard to find ways to help kids get hours, but when you have 1,000 kids needing 75 hours, it's impossible. I'm not against kids learning about volunteering. If they could maybe take a school day and learn about some opportunities in their communities and help with a service project, I think that would be a great idea.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jessica Anderson, March 20, 2024

Comments: *Submitted electronically.*

I believe that parents should have autonomy, free from government overreach, in deciding how they want to raise their children including values such as community service. LEARNS purports to have a foundation in parents' rights, but in reality, none of these things were voted on by parents. LEARNS preaches against indoctrination unless it's the indoctrination that aligns with the government's beliefs.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Brook Sanchez, Public Educator, March 20, 2024

Comments: *Submitted electronically.*

I am emailing to voice my concerns regarding the required community service hours for current 9th grade PUBLIC SCHOOL students. As a parent of a current 9th grader and 4th grader, as well as a public school educator, I am incredibly disheartened by this requirement. First, I do believe in raising my kids with a servants heart and we participate in service activities when possible. However, making ur mandatory literally defeats the purpose. This takes it from being a choice to serve for the right reasons to checking a box.

Secondly, the fact that what's good for the goose isn't good for the gander is far from ok. If this is a requirement of public school students, it should be required of ANY SCHOOL receiving public funds via vouchers. If this is "valuable" for my children and the lower socioeconomic students I teach, than surely it's beneficial for the higher socioeconomic students in private schools. Either make it. Requirement across the board, or not at all.

The reality is, how is it fair to require students who are already in situations where they may need to work jobs to help support their families, themselves, etc find additional time to volunteer? It's been stated this should/could happen during school hours? How? When? These students are literally working bell to bell to try and meet state testing mandates and score minimums, again that private schools receiving the same funds aren't required to meet. The fact that students without the financial needs are able to work their part time jobs, participate in their extra curricular activities, and enjoy their families with no worry of this graduation requirement while the lower socioeconomic public school students are forced to do so is not ok. It is an obvious ploy to again make public school look bad and in four years cause graduation rates to drop yet again.

I implore you to look at this through a realistic lens. As a parent, this requirement has NOT been formally addressed at my child's school. I am only aware because I am an involved mom/educator who is paying attention to the ridiculous nonsense being forced upon public schools by LEARNS. The larger impact of this requirement will not be felt until students are unable to graduate in 4 years. Do the right thing. Either make it a requirement for all or remove it entirely.

Division Response: **Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.**

Commenter Name: Kim Lathum, March 20, 2024

Comments: *Submitted electronically.*

Teenagers in high school won't do this, they're too lazy and selfish. If it doesn't involve social media and their cell phones they don't want any part of it.

Division Response: **Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.**

Commenter Name: Kyle Shinn, March 20, 2024

Comments: *Submitted electronically.*

Y'all refuse to teach children how important credit is, Y'all refuse to teach children how to correctly and efficiently file taxes to obtain the most of their money back from the thieves known as government, refuse to actually teach children any needed life skills to be successful in early adulthood without suffering their first 10-15 years. With the education system refusing to teach any of these important skills I will be using ALL of my children's free time away from school teaching them all of these skills as well as the value of a dollar and how to have a positive work ethic. These skills will be earned through hard work WITH me. If my signature on this form is not accepted, as I very publicly stated before... my children will be home schooled.

Division Response: **Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.**

Commenter Name: Steven Sutton, March 20, 2024

Comments: *Submitted electronically.*

What kinda communist gall does it take to REQUIRE community service to graduate from high school.. Community Service is a legal punishment for misdeeds. Voluntary Community Service is a grand thought and sho7ld be considered by each individual. A REQUIREMENT of community service is an attack on individual freedom. I urge you to void this proposed requirement!

Division Response: **Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.**

Commenter Name: Kristina Ware, March 20, 2024

Comments: *Submitted electronically.*

I really don't think any child should be required to do community service to graduate High School. The town I live in is very small and really don't have anything for the teenagers to do. It would be impossible for any teenagers to accomplish that many hours before graduating.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Keith Smith, March 20, 2024

Comments: *Submitted electronically.*

I am a Single Working Parent, I am a Dad that had to fight against the bias in the family court system to get custody of my daughter during the divorce process, which came at great personal, financial, and emotional cost, despite my being the injured party to begin with. It cost me nearly everything I have worked for the last 21 years since I graduated high school. It should have been an open and shut case because of the danger my ex (the child's mother) put my daughter through. I am currently working 3 jobs and likely will have to for at least another 10 years to pay off what it cost me to get custody. That is in addition to the normal two person household duties. My daughter is in Kindergarten now and she won't turn 16 and be able to legally drive until she's a Jr in High School, meaning that in addition to my 3 jobs and 2 person household duties, I will have to driver her around for at least 2 years to meet this burdenous and asinine requirement. I am already at my limit between taking care of her, getting her to school as well as the commute for custodial exchanges, there just aren't enough hours in the day to add more.

I certainly agree that there is value in community service and service in general is a good thing IF done of ones own free will. Once it becomes a government mandate it becomes a punishment (as is currently done in the courts today) levied against someone who has done no crime. It also cheapens and devalues the service and removes the intrinsic reward of helping others. I have and continue to support many parts and requirements of the LEARNS act and believe the idea and motivation behind the requirement is noble, but I cannot support the requirement. It does nothing to help and actively hurts many struggling Arkansans, especially since the service would have to be government approved.

A volunteer musician at a festival or a teacher at church are undeniably a service to the community however they are unlikely to be "approved by curriculum" and in the church example, unable to be approved due to inability of the state to sanction a church activity one way or another, and the student get credit for such. There are also cases (I was one) where the child

has responsibilities, duties and work to do at home or family farm that preclude or severely limit many opportunities for "community service". All in all this is one of those "Feel Good" ideas that once implemented cause many unintended, untenable and negative consequences Just like what was floated during the Obama presidential years. Please, Please, Please I am begging you, Please DO NOT make service a requirement, it is a massive burden for many as I am and my daughter are far from being the only ones that will be hurt and punished by this.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Jonathan Smith, Arkadelphia High School, Asst. Principal, March 7, 2024

Comments: *Submitted electronically.*

I am writing to express my opposition to the proposed requirement for a student to have 75 hours of community service in order to graduate and ask that the requirement be removed. Not only is this a burden on the students and their families, it is yet another unnecessary task that has to be put on already overworked counselors/staff who have to try and keep the records of all their high school students up to date while trying to juggle the already overwhelming number of responsibilities such as mental health, 504's, and scheduling. I know that our 2 counselors for our current 588 students have more work than they can get done in a day. Personally, as a parent and school administrator, I do not believe that it is in any way the responsibility of the school district or state to require students to volunteer to do community service. It is the role of parents to instill their child the need and desire to serve others. This requirement is clearly outside the scope of the role of what public schools should be tasked with.

I am asking you to please consider all of the athletes that play multiple sports and have practices every day after school. Do we really expect them to spend their weekends doing community service? The students who work, like my son, who is trying to save money to help pay for college. What about the many students who do not have access to transportation? I could go on, but I think that if you will take a few minutes to reflect on how this is going to impact students and staff, that you will agree that this requirement is one that needs to be removed.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.

Commenter Name: Arkansas Public School Resource, April 24, 2024

Comments: *Submitted electronically.*

- 1.) Sections 3.02.2.1 and 3.02.3, Page 2: These sections contain language which is outside of the statutes.
- 2.) Section 3.04.2.2, Page 3: This section contains language which is outside of the statutes.
- 3.) Sections 3.05 and 4.03, Pages 3 and 4: These sections contain language which is outside of the statutes.

Division Response: Comment considered; substantive changes were made after the first public comment period. No additional changes were made.

Commenter Name: Olivia Gardner, Arkansas Advocates for Children & Families, Director of Education Policy, April 24, 2024

Comments: *Submitted electronically.*

April 24, 2024

To: Arkansas Division of Elementary and Secondary Education, Arkansas Department of Education
From: Olivia Gardner, Education Policy Director, Arkansas Advocates for Children and Families

Re: DESE Rule Governing Community Service

Thank you for the opportunity to comment on this proposed rule. My name is Olivia Gardner, and I am the Education Policy Director for Arkansas Advocates for Children and Families. We would like to raise concerns regarding this proposed rule.

Community service is a rewarding and important experience for young people to have, but we worry that this rule puts too much of a burden on low-income or single-parent families. More affluent families will undoubtedly have the ability to arrange for the time, transportation, and planning involved in helping their students meet these requirements. But this simply will not be the case for many families.

We believe that the list for extenuating circumstances (3.04.2) is not currently adequate. While this section notably includes the phrase “without limitation,” we recommend adding an extenuating circumstance that more explicitly supports low-income families who may lack access to reliable transportation, who cannot afford to take off work, or who otherwise lack the resources to help their student to meet this requirement. Without doing so, these families may not see themselves represented in the current list or understand that an exception could be made for them.

Additionally, 3.04.2.4 includes a requirement for the family to provide notice to the

public school district board of directors if the student is a major contributor to the family's income. While we support the spirit of this exception, we feel that the requirement of providing notice to the public school district board of directors places an unfair burden on these families. And it is notable that this requirement is not included in any of the other extenuating circumstances listed.

AACF shares the belief that community service opportunities can be enriching and a valuable learning opportunity for students. However, we strongly encourage DESE to consider that there is a sizeable number of families who will not have the ability to help their student meet this requirement and that small, but important, changes can be made to support these families more effectively.

Division Response: Comment considered; substantive changes were made after the first public comment period. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Roland Popejoy, NBCT, Superintendent, Valley View Public Schools, April 22, 2024

Comments: *Submitted electronically.*

Please accept the following comments on the proposed rules governing community service and diploma requirements.

- Definition 2.04 (second 2.04) - The requirement for local school board approval for 'partner organizations' to verify community service hours will limit some of the valuable community service experiences that our students have completed through our local policy for completing and documenting community service hours. I feel that flexibility should be provided on the manner in which district policy may structure the organizations and activities approved for community service and the certification of the documentation submitted to the district for hours earned through each activity.
- Section 3.02.3 - The rules appear to require public school districts to fully research the student safety measures, equipment, training, and other infrastructure each 'partnering organization' has in place prior to approval, which in essence indicates the district's approval would potentially result in the district being liable for any issues that may arise in any of these organizations where community service activities are completed. This will likely significantly reduce the approved community service programs/activities due to the heavy lift that such a thorough review of each potential partner organization would require. Also, if there are a limited number of 'partner organizations' that have the required infrastructure to accommodate students, would this require the district to fund the needed equipment, training and background checks so that students would have additional opportunities to choose from? While I fully understand and agree with the

need to ensure student safety and privacy and to have the necessary equipment and training to complete community service activities, much of this is outside the district's control so I can see the number of community service partners being decreased with the current way that the rules are written. This in turn will decrease the impact that such community service learning will have on our students due to limiting the number of approved experiences students have to select from when deciding how they will earn the required hours prior to graduation.

Division Response: Comment considered; substantive changes were made after the first public comment period to section 3.02.3. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Anne Martfeld, Assistant Superintendent, Pea Ridge School District, April 8, 2024

Comments: *Submitted electronically.*

Please find comments below regarding the Rules for Community Service:

2.00 - Community Service is not included in the definitions. It was previously defined in COM-24-021 of 8/30/2023 as “*activities carried out by individual students or groups of students to enhance and contribute to their local community.*” Please include this or some definition in the rules.

2.04 & 4.02 - COM-24-021 released on 8/30/23 alleviated this board approval: “*However, in cases where a community service project is not approved by the local board or organized by the district, the decision for approval lies with the school's volunteer coordinator or administration.*” Can that language be clarified in the rules to preserve the rights of parents? Parents' rights should prevail. Preserve a parent’s right to choose where a student completes community service. Parents need to be able to decide where a student serves. Parents should lead, guide, and direct this closely with safety guidelines from the state and local schools. School boards (state or local) should not approve a list of organizations for service. Parents have been restricted by this list historically.

3.02.3.2 - What does this mean? This seems excessive to mandate on schools and ultimately restricts parents and students. This will ultimately limit rather than promote service.

4.01 - Please ensure the Class of 2027 and beyond may benefit from the 1.0 elective academic credit and course code 496010 as allowed since 1993. While the AR LEARNS Act sunsets the optional program it does not preclude DESE from extending credit to the Class of 2027 and beyond in the new, required program. This is currently the only way to get “community service” on your transcript and that benefits our students in the college admissions process. Families want to know why we would stop giving credit to the students who are now required to do this.

Division Response: Comment considered; substantive changes were made after the first public comment period to sections 2.0. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change. No additional changes were made.

Commenter Name: Kathy Marshall, March 21, 2024

Comments: *Submitted electronically.*

Slave labor was abolished a long time ago, are the private, charter, and homeschools also forced to this 75 hours of crap jobs no one adult will do for money, exceptions for certain people are they being considered, like the disabled, and the children who are challenged in other ways. Let the prisons do it , they are being free room and board, free medical care, and our kids aren't, being cut off Medicaid or health insurance isn't helping them. What if they get hurt or mamed while doing this, is the state or gov going to pay for their loss of limbs or mental health issues? Kids aren't prisoners don't treat them like they are only here to repopulate after COVID by being chicken hangers and breeders, it is against federal and state law to force a child to work under 18 years old, you are breaking the law and mistreating our children, when I see all of the gov and legislatures kids cleaning toilets, picking cotton, and scoping horse manure with pictures verified then maybe , my kid will do 75 hours of work for a salary or hourly pay. Why are we teaching our children to hate , why are we teaching our kids that they are here to put in their heads that they are trash except the 1percent that it never seems to touch.An education is learning not being a SLAVE to politicians and hoping the parents won't notice it, books not a housemaid to the rich, but we are the worst educated in the whole country, no surprise because ARKANSAS is known as the state where all people either go die or just can't afford to ever leave because the local and state gov won't have a job without all the poor here. If we want smart kids we would all vote blue across the board the whole state and get rid of this learns bill, trash not worth the paper printed on.

Division Response: Comment considered; no changes made. The comment presented raises policy concerns which are governed by statutory provisions. The rule cannot conflict with state law and therefore, the changes proposed in the comment would require a legislative change.