

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION OEC RULES
GOVERNING BETTER BEGINNINGS TIERED QUALITY RATING AND
IMPROVEMENT SYSTEM**

PUBLIC COMMENTS

Commenter Name and Organization (if applicable): Lucas Harder, Arkansas School Board Association, May 29, 2024

Comments: *Submitted Electronically*

In 2.D.2, the phrase “stages of development” appears twice back to back.

Division Response: **Changes were made to correct erroneous nonsubstantive changes consistent with the comments. No additional changes were made.**

Commenter Name and Organization (if applicable): Donna Kirkwood, Program Coordinator, Childhood Services, ASU, May 24, 2024

Comments: *Submitted Electronically*

Hey there,

I see that the BB rules have been updated to reflect DOE, OEC, etc.

Since they are open to public comment, I’d like to suggest that the following updates if possible:

Pages 6, 9, and 17-Update to the terms used to describe YPQI assessments. PQA is similar to ERS, OQA (formerly Form B) is similar to PAS/BAS.

Page 3-The PAS Subscales have been updated as well.

I highlighted the areas where these edits would be and included comments with each one.

Thanks for considering these changes if possible.

Wishing you well,
Donna Kirkwood

Division Response: **Comment Considered; no changes made. Division declines to make the suggested policy changes.**

Commenter Name and Organization (if applicable): Lucas Harder, Arkansas School Board Association, September 20, 2024

Comments: *Submitted Electronically*

Better Beginnings:

20 CAR § 1001-107(f): Is the (1) here actually necessary as there is not currently an (2) to follow?

(a): This sentence should end with a semicolon and a “and”.

20 CAR § 1001-110(b)(2): “Commissioner of Education”, should be changed to “Commissioner of Elementary and Secondary Education”.

Division Response: **Changes were made to correct erroneous nonsubstantive changes consistent with the comments. No additional changes were made.**