

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES
GOVERNING THE PUBLIC RATING SYSTEM ON ANNUAL SCHOOL
PERFORMANCE REPORTS AND THE SCHOOL RECOGNITION PROGRAM**

PUBLIC COMMENTS

Commenter Name and Organization (if applicable): Dr. Nancy Churchwell, Chief Financial Officer, Newport School District

Comments: Good morning,

For Title 6. Education Chapter I. Division of Elementary and Secondary Education Subchapter C. Educational Quality, Standards, and Assessment Part 64. Rules Governing the Public School Rating System on Annual School Performance Reports and the School Recognition Program Subpart 1. Generally,

6 CAR § 64-102. School rating system.

Item 2) (2) The Division shall implement an “Automatic Grading Scale Increase” in any year in which 65 percent or more of the school statewide aggregate earn a grade of A or B, and raise the scale required to earn a school grade by five percent until the scale reaches 90-100 = A, 80-89 = B, 70-79 = C, 60-69 = D, and 0-59 = F.

This section sets 59% of school districts up for receiving a grade of F and another 10% of districts to receive a grade of D. When giving a test in a classroom, you do not grade based on rank, you give a grade based on individual performance on each item. This automatic grading scale increase is unfair to districts working to improve their letter grade. Furthermore, This means that the rest of the country will see that more than half of Arkansas School Districts are failing. I do not believe this is the image we want to promote, when school districts across the state are working exceptionally hard to improve academic success of all students.

Furthermore, with the school choice laws currently in effect, this requirement is a violation of Lake View School District No. 25 v. Huckabee. School funding is based on student enrollment. Students will leave these "Failing" schools and flee to the "A" & "B" schools. This will lead to inadequate and inequitable funding for these districts. If each school has a fair opportunity to reach "A" or "B" status, I believe this proposed rule would be in compliance with the Lake View Standard.

Thank you for taking the time to consider this comment.

Division Response: Comments considered; No changes made. All schools do still maintain the ability to reach an A or B letter grade by increasing the percentage of students who meet the criteria for each indicator. The automatic escalator does not prevent a school from earning points. If 65% are earning an A or B then that would leave 35% in C, D or F.

Commenter Name and Organization (if applicable): Christy Hovantez, Ph.D., Senior Policy Fellow, ExcelinEd

Comments: Dear Secretary Oliva, Chair Moore and members of the Arkansas Board of Education:

I am writing to submit the Foundation for Excellence in Education's (ExcelinEd) comments regarding the proposed "*DESE Rules Governing the Public-School Rating System on Annual School Performance Reports and the School Recognition Program.*"

ExcelinEd has close to two decades of experience working with states across the nation on school accountability systems and we respectfully offer the following recommendations to improve Arkansas' current proposal.

School grades should provide transparent, objective and easily understood data to parents, educators and the public to spur improvement and student learning to prepare them for the challenges of college, career and civic life. Pioneered in Florida and in use in 11 other states across the country, A-F school grading remains a proven and effective accountability tool.

The proposed rules streamline and improve Arkansas' A-F school accountability calculation in many ways:

- Moving to a straight percent proficient/advanced calculation for ELA, math and science increases transparency and focuses on a meaningful outcome for students—proficiency.
- The added focus on the lowest performing students ensures no student will be left behind.
- Using only the four-year graduation rate signals the expectation to graduate on time.
- The overall A-F grading scale is aspirational, yet attainable with the inclusion of an automatic grading scale increase to raise the bar when schools demonstrate success to ensure performance will not stagnate.

However, one policy approach is preventing the Arkansas school grading calculation from being exceptional: the use of a normative value-added model to measure student growth.

ExcelinEd strongly encourages the use of a criterion-based growth calculation to measure each student's growth towards mastery of the state standards. The current value-added model makes judgments about growth using a normative approach that compares a student's performance to their peers instead of a set standard.

Using a criterion-based calculation rewards schools for moving students from a lower achievement level to a higher achievement level and is meaningful to the student's quest to reach proficient and advanced achievement. Criterion-based growth benefits include:

- Educators can compute and replicate growth calculations;
- Individual student learning expectations are set and measured;

None of these outcomes can be accomplished with value-added growth because it is a normative measure. Drawbacks of value-added models include:

- Statisticians compute growth generally using a black-box proprietary formula that cannot be replicated without statewide student level data;
- Individual student learning expectations are determined after the student's state assessment results are back;
- Not all students can demonstrate growth—there will always be winners and losers no matter how much state results improve;
- Criteria for determining individual student growth is determined after the test results are back so students, parents, educators and policymakers do not know how much a student must improve to demonstrate growth until after the school year is over;
- The improvement needed for demonstrating growth is different for each student;
- Expectations for demonstrating growth change from year to year making longitudinal comparisons impossible;
- Growth expectations, even if they are met each year, may not result in proficient or advanced student achievement.

Arkansas' neighbors, Louisiana and Mississippi, are exemplars when it comes to strong A-F grading models. Both states have demonstrated improved student outcomes as a result of their commitment to meaningful school accountability systems.

Arkansas has the opportunity to create an exceptional school grading model that will spur action within the walls of each school and make a difference for students. We encourage the state to continue and strengthen its commendable efforts to disrupt the status quo and transform education on behalf of each and every Arkansas student.

Division Response: Comments considered; No changes made. There are various methods and formulas for calculating growth scores. In Arkansas, a comprehensive working group consisting of educators from Arkansas and technical experts was established to address this issue. The committee recommended continuing with the Value-Added Model (VAM) to calculate growth. Stakeholders concluded that the VAM model effectively accounts for individual student growth scores and aligns well with the overall performance metrics at the teacher, school, and district levels.

Commenter Name and Organization (if applicable): Amanda Dawson, Senior Director State and District Partnerships, College Board
adawson@collegeboard.org

Comments: Good afternoon,

We appreciate the opportunity to submit the attached comments regarding the pending rules governing Arkansas's Public School Rating System on Annual School Performance Reports and the School Recognition Program.

Dear Secretary Oliva,

On behalf of the College Board, a nonprofit mission-driven organization that connects students to college success and opportunity, I'm writing to provide feedback on the proposed rulemaking for the *Rules Governing the Public School Rating System*. Our comments focus on:

- The high school indicator in proposed (b)(2)(E), the number of students earning a diploma of merit or distinction that lead to enrollment, enlistment, or employment; and
- The annual Public School Rating Business Rules in proposed (d).

We appreciate the opportunity to provide meaningful feedback and are pleased to see the state's continued commitment to rigorous educational standards and meaningful student outcomes.

Feedback on the High School Indicator (b)(2)(E)

College Board commends and congratulates Arkansas for its unwavering dedication to ensuring that every student graduates "success ready." The state's commitment to high educational standards and requirements that are meaningful, relevant, and rigorous— which also strongly align to College Board's mission – is a sound investment in the well-being and economic vitality of the state. We support the inclusion of the indicator for the number of students earning a diploma of merit or distinction that lead to enrollment, enlistment, or employment.

Feedback on the Annual Public School Rating Business Rules (d)

Per the current Success-Ready Pathway Guide¹, to earn a merit or distinction demonstration for a high school diploma, a student must complete a success-ready pathway and meet additional postsecondary criteria.

In alignment with Arkansas's dedication to student success, we encourage the state, as it considers the business rules to implement the ratings system, to:

- Incorporate current and future AP courses into additional “Success-Ready Pathways” and
- Add AP Career Kickstart employer-endorsed credentials to the state’s identified high wage, high demand industry-recognized credential list.

Success-Ready Pathway Options

College Board is pleased to see that the current guide for “Success-Ready Pathway” options include AP Scholar, AP Scholar with Honor, AP Scholar with Distinction, and AP Capstone Diploma paths. These selections further enhance student choice and readiness for college and career. We also are pleased that several AP courses – AP Computer Science Principles, AP Computer Science A, AP Spanish Language, AP French Language, and AP German Language – are included different pathway options.

We encourage Arkansas to evaluate on a regular basis whether current and future AP courses could be positioned in other pathways to ensure maximum opportunity for students to earn college credit while working towards a diploma demonstration.

AP Career Kickstart Credentials

College Board is building new AP Career Kickstart courses to accelerate high school students on their paths to in-demand careers. AP Career Kickstart exams will not only certify college-level work and result in college credit (like traditional AP Exams) but will also certify skills valued by industry through an employer-endorsed credential.

These credentials are made with and for industry to ensure they validate skills that companies value and seek. College Board is growing in industry recognition from leaders like Wells Fargo, Eli Lilly, and Nissan, and we are building robust partnership with intermediaries like the US Chamber of Commerce and YearUp United to help strengthen the connection to opportunities to credential earners. In Arkansas, College Board has received support from local industry and employers, reflecting their confidence in the quality and relevance of our credentials.

AP Business Principles/Personal Finance and AP Cybersecurity will be launching nationally in the 2026- 2027 school year and AP Networking will follow in the 2027-2028 school year.

We strongly encourage the state to add AP Career Kickstart credentials to the state’s “H2 Credentials” to ensure districts and schools are recognized for helping students meet qualifying criteria for ratings purposes. College Board welcomes the opportunity to work with Arkansas on this effort.

College Board thanks the state for the opportunity to provide meaningful feedback on the proposed rulemaking for the *Rules Governing the Public School Rating System*. We are hopeful our recommendations will be included to ensure Arkansas students, districts, and schools are recognized for their success.

Sincerely,
David Gupta
Vice President, State and District Partnerships

College Board

Division Response: Comments considered; No changes made.