

**DIVISION OF ELEMENTARY AND SECONDARY EDUCATION RULES  
GOVERNING STANDARDS FOR ACCREDITATION OF ARKANSAS PUBLIC  
SCHOOLS AND SCHOOL DISTRICTS**

**PUBLIC COMMENTS AND RESPONSES**

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Commenter Name: Kelli Langan, Springdale School District (1/3/2022)

Comment: You have moved the annual report to the public [See Standard 3-B.2] to be posted to the district website by August 1. Traditionally, we do not have processed results back from the prior year's state assessment by August 1. Does this indicate that we should NOT include increasing academic achievement and growth in our district goals as we won't be able to show progress toward accomplishing these goals at this time? More succinctly, a deadline of August 1 for the annual report to the public would preclude having academic achievement as measured by the state assessment and growth from district goals.

Division Response: Comment considered. August 1 is merely a deadline for districts to post their annual report to the public. School districts have time throughout the preceding school year to prepare and post its report. Some districts present their annual report to the public in October when the ESSA School Index is posted. Other districts may wait until the School Report Card is accessible to the public (i.e., late December through April 15). August 1 is the date on which the Division of Public School Accountability begins its monitoring. **No changes made.**

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Commenter Name: Gregg Grant, Arch Ford Education Service Cooperative (1/4/2022)

Comment: [Concerning Standard 4-D.6, which requires employment of a computer science teacher at each high school by the 2023-2024 school year], my concern is for our small, rural schools being able to find quality licensed computer science teachers. I do appreciate the requirement does not begin until the 2023-2024 school year, allowing districts the opportunity to encourage current staff members to add computer science certification to license but I still feel it may be a shortage area.

Division Response: Comment considered. Although we understand your concern regarding the availability of certified Computer Science teachers, the CSforAR team (which includes the Statewide Computer Science Specialists funded through Arch Ford Education Service Cooperative, as well as our State Director of Computer Science) have and will continue to put the State in a good position to implement this requirement in 2023-2024. When the state first began this initiative in 2015, DESE identified fewer than 50 teachers that had state recognized training and were "certified" to teach certain computer science courses. Since then the CSforAR team has grown the number of certified teachers to over 650, and an additional 48 will attend certification training in spring of 2022. **No changes made.**

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Commenter Name: Novella Humphrey, Southside School District (1/5/2022)

Comment: In reviewing the rules and proposed changes, I noticed the change date for website publication of the annual report to the public (3-B.2). This report requires progress of the district/school towards accomplishing goals and correcting deficiencies. While school leaders have student achievement data in time to meet this deadline, it does not allow the leaders to first meet with a school or district's entire staff of teachers before it is published on the website. For example, school will begin August 22, 2022. Teacher in-service and professional development days will be held across schools from August 8-19. During this time, school leaders traditionally share data, progress towards goals, celebrate growth, and collaborate with teachers to plan for continued growth in the upcoming school year. Publishing this report prior to this time when leaders have their entire staff may be counterproductive to the culture of trust and emphasis on growth that so many leaders have worked to cultivate. I recognize the change to August 1 better aligns with other website requirements and the specific requirement to publish school improvement plans. It makes this easier from a compliance standpoint. However, I feel it is critical to allow school leaders time to meet with teachers/staff before publication. Again, thank you for accepting comments on these proposed changes.

Division Response: Comment considered. *See* Division Response to the Comment of Kelli Langan. **No changes made.**

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Commenter Name: Lucas Harder, Arkansas School Boards Association (1/7/2022)

Comment (1): Several technical changes were recommended:

<u>Section</u>	<u>Comment</u>
3.06.1.2:	"Commissioner of Education" should be "Commissioner of Elementary and Secondary Education".
4.00:	I would recommend adding "at least" before "every two years". The "two" is missing the parenthetical Arabic numeral for consistency. There is a "the" missing from before "Division".
4.01:	I would recommend changing "or Division" to "or the Division's".
7.04:	The language in this subsection is italicized while all others are normal.
7.04.4:	There is a comma missing from between "time" and "but".
8.01:	"Calendar" is on the wrong side of the parenthetical "(15)".
8.04	There is a comma missing from between "year" and "which".
10.00:	"Commissioner of Education" should be "Commissioner of Elementary and Secondary Education".
10.01:	There seems to be some language missing here. There's no language indicating what the start of the fifteen days is. I believe the missing language should be

- something along the lines of “after the school district’s receipt of the notice of being placed in Accredited – Probation status”.
- 11.01.1: “Commissioner is not previously abbreviated. Also, “Commissioner of Education” should be “Commissioner of Elementary and Secondary Education”. I would recommend adding an “at least” before “thirty”. I would recommend changing “hearing the waiver petition” to “where the waiver petition will be heard”.
- 1-A.1.2.9: I would recommend changing “an approved waiver” to “an approved licensure exception” to more closely match the language and options available under Chapter 7 of the Educator Licensure Rules as well as the language used throughout Standard 4.
- 1-C.1.1: For consistency, 95% is missing the longhand.
- 1-C.2.3: For consistency, 60% is missing the longhand.
- 1-C.2.4: I would recommend removing “with the freshman class of 2017-2018,” as even the super seniors should have graduated by the time the new Standards go into effect.
- 1-C.2.5: “One” is missing a parenthetical Arabic number for consistency.
- 1-C.2.7: The parenthetical “(1)” is missing the longhand for consistency.
- 3-B.1: There is a comma missing between “state” and “and”.
- 3-B.2: “The” is repeated twice in the new language.
- 4-C.3: “Three” here is missing a parenthetical Arabic numeral for consistency.
- 4-C.4: “Four” here is missing a parenthetical Arabic numeral for consistency.
- 4-D.4: “Three” here is missing a parenthetical Arabic numeral for consistency.
- 4-D.5: “Four” here is missing a parenthetical Arabic numeral for consistency.

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

Comment (2): While I understand that the August 1 deadline for posting the report to the public is intended to align this posting with the deadline for the other postings to the district website, the August 1 deadline in this case is potentially problematic. Most districts wait until after receiving their previous year’s test scores to hold their annual report to the public so as to include those results in the discussion. As a result, that puts their annual report to the public after August 1 so that the report that would be being posted to the website would be a year old rather than for the current school year. Requiring the report to the public be posted by November 1 would provide adequate time for districts to review the previous year’s test data for use in the report as well as reinstate the previous November 1 deadline for holding the public meeting on the report to the public.

Division’s Response: Comment considered. *See* Division Response to the Comment of Kelli Langan. **No changes made.**