

ARKANSAS DEPARTMENT OF EDUCATION RULES GOVERNING  
THE CREATION OF PUBLIC SCHOOL DISTRICTS BY DETACHMENT

PUBLIC COMMENTS AND AGENCY RESPONSE  
(FIRST PUBLIC COMMENT PERIOD)

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**Name:** Lucas Harder, Arkansas School Boards Association

**Comment:** Title: “Rules Governing” currently appears between the Stricken ADE and the new DESE and appears to be intended to be stricken as well.

**Agency Response:** The change was made.

**Comment:** 8.04-8.04.4: “National school lunch” should be changed to “enhanced student achievement” in accordance with Act 1083.

**Agency Response:** The change was made.

**Comment:** 8.04.4: I would recommend changing this to read “under the results of an analysis.”

**Agency Response:** The word “under” was removed to resolve the issue instead of adding the word “the,” resulting in the recommended outcome.

**Name:** Rebecca Miller-Rice, Bureau of Legislative Research

**Comment:** (1) Title – It appears “Rules Governing” has been stricken?

**Agency Response:** The change was made.

**Comment:** (2) Section 5.03 – It appears that this section is premised on Ark. Code Ann. § 6-13-1504(b)(1); is there a reason that the language “after complying with Ark. Code Ann. § 6-13-1504(b)(2)” is being stricken when that language still appears in the statute?

**Agency Response:** The change was made.

**Comment:** (3) I noticed a few references to “national school lunch state categorical funding.” That term has been changed recently in other ADE DESE rules pursuant to Act 1083 of 2019, which amended the name of national school lunch state categorical funding. Will these references also be amended at some point?

**Agency Response:** The change was made.