



Arkansas Department of Education
Division of Career and Technical Education
Preparing Students for Future College and Career Success

January 15, 2026

Ms. Rebecca Miller-Rice
Rules Administrator
Bureau of Legislative Research
One Capitol Mall, Fifth Floor
Little Rock, AR 72201

Re: For Legislative Council review: Rule Governing the Arkansas Adult Diploma Program

Dear Ms. Miller-Rice,

Attached is a copy of the above proposed Division of Elementary and Secondary Education administrative rule. This filing also contains the Legislative Council questionnaire, financial impact statement, markup version of the rules, post-public comment summary, and public comments with division responses. The Division respectfully requests that this proposed rule amendment be placed on the ALC Administrative Rules Subcommittee agenda.

The Governor's Office approved the attached administrative rule for public comment release. On November 13, 2025, the State Board of Education approved the rule for public comment release. The public comment period ran from November 15, 2025, through December 16, 2025. A public comment hearing was held December 2, 2025, at the Arch Ford Building, Four Capitol Mall, Little Rock, AR 72201. No changes were made after the public comment period. On January 8, 2026, the State Board gave final approval for this rule.

Thank you for your assistance. If you have any questions or require further information, please do not hesitate to call me at (501) 682-4202.

Respectfully submitted,

/s/ Daniel Shults

Chief Legal Counsel
Arkansas Department of Education

**QUESTIONNAIRE FOR FILING PROPOSED RULES WITH
THE ARKANSAS LEGISLATIVE COUNCIL**

DEPARTMENT _____
BOARD/COMMISSION _____
BOARD/COMMISSION DIRECTOR _____
CONTACT PERSON _____
ADDRESS _____
PHONE NO. _____ EMAIL _____
NAME OF PRESENTER(S) AT SUBCOMMITTEE MEETING _____
PRESENTER EMAIL(S) _____

INSTRUCTIONS

In order to file a proposed rule for legislative review and approval, please submit this Legislative Questionnaire and Financial Impact Statement, and attach (1) a summary of the rule, describing what the rule does, the rule changes being proposed, and the reason for those changes; (2) both a markup and clean copy of the rule; and (3) all documents required by the Questionnaire.

If the rule is being filed for permanent promulgation, please email these items to the attention of Rebecca Miller-Rice, miller-ricer@blr.arkansas.gov, for submission to the Administrative Rules Subcommittee.

If the rule is being filed for emergency promulgation, please email these items to the attention of Director Marty Garrity, garritym@blr.arkansas.gov, for submission to the Executive Subcommittee.

Please answer each question completely using layman terms.

1. What is the official title of this rule?

2. What is the subject of the proposed rule? _____

3. Is this rule being filed under the emergency provisions of the Arkansas Administrative Procedure Act? Yes No

If yes, please attach the statement required by Ark. Code Ann. § 25-15-204(c)(1).

If yes, will this emergency rule be promulgated under the permanent provisions of the Arkansas Administrative Procedure Act? Yes No

4. Is this rule being filed for permanent promulgation? Yes No

If yes, was this rule previously reviewed and approved under the emergency provisions of the Arkansas Administrative Procedure Act? Yes No

If yes, what was the effective date of the emergency rule? _____

On what date does the emergency rule expire? _____

5. Is this rule required to comply with a *federal* statute, rule, or regulation? Yes No

If yes, please provide the federal statute, rule, and/or regulation citation.

6. Is this rule required to comply with a *state* statute or rule? Yes No

If yes, please provide the state statute and/or rule citation.

A.C.A. § 6-44-309

7. Are two (2) rules being repealed in accord with Executive Order 23-02? Yes No

If yes, please list the rules being repealed.

If no, please explain.

8. Is this a new rule? Yes No

Does this repeal an existing rule? Yes No

If yes, the proposed repeal should be designated by strikethrough. If it is being replaced with a new rule, please attach both the proposed rule to be repealed and the replacement rule.

Is this an amendment to an existing rule? Yes No

If yes, all changes should be indicated by strikethrough and underline. In addition, please be sure to label the markup copy clearly as the markup.

9. What is the state law that grants the agency its rulemaking authority for the proposed rule, outside of the Arkansas Administrative Procedure Act? Please provide the specific Arkansas Code citation(s), including subsection(s).

10. Is the proposed rule the result of any recent legislation by the Arkansas General Assembly?
Yes No

If yes, please provide the year of the act(s) and act number(s).

11. What is the reason for this proposed rule? Why is it necessary?

12. Please provide the web address by which the proposed rule can be accessed by the public as provided in Ark. Code Ann. § 25-19-108(b)(1).

13. Will a public hearing be held on this proposed rule? Yes No

If yes, please complete the following:

Date: _____

Time: _____

Place: _____

Please be sure to advise Bureau Staff if this information changes for any reason.

14. On what date does the public comment period expire for the permanent promulgation of the rule? Please provide the specific date. _____

15. What is the proposed effective date for this rule? _____

16. Please attach (1) a copy of the notice required under Ark. Code Ann. § 25-15-204(a)(1) and (2) proof of the publication of that notice.

17. Please attach proof of filing the rule with the Secretary of State, as required by Ark. Code Ann. § 25-15-204(e)(1)(A).

18. Please give the names of persons, groups, or organizations that you anticipate will comment on these rules. Please also provide their position (for or against), if known.

19. Is the rule expected to be controversial? Yes No

If yes, please explain.

FINANCIAL IMPACT STATEMENT

PLEASE ANSWER ALL QUESTIONS COMPLETELY.

DEPARTMENT _____

BOARD/COMMISSION _____

PERSON COMPLETING THIS STATEMENT _____

TELEPHONE NO. _____ **EMAIL** _____

To comply with Ark. Code Ann. § 25-15-204(e), please complete the Financial Impact Statement and email it with the questionnaire, summary, markup and clean copy of the rule, and other documents. Please attach additional pages, if necessary.

TITLE OF THIS RULE _____

1. Does this proposed, amended, or repealed rule have a financial impact?

Yes No

2. Is the rule based on the best reasonably obtainable scientific, technical, economic, or other evidence and information available concerning the need for, consequences of, and alternatives to the rule?

Yes No

3. In consideration of the alternatives to this rule, was this rule determined by the agency to be the least costly rule considered? Yes No

If no, please explain:

(a) how the additional benefits of the more costly rule justify its additional cost;

(b) the reason for adoption of the more costly rule;

(c) whether the reason for adoption of the more costly rule is based on the interests of public health, safety, or welfare, and if so, how; and

(d) whether the reason for adoption of the more costly rule is within the scope of the agency's statutory authority, and if so, how.

4. If the purpose of this rule is to implement a *federal* rule or regulation, please state the following:

(a) What is the cost to implement the federal rule or regulation?

Current Fiscal Year

General Revenue _____

Federal Funds _____

Cash Funds _____

Special Revenue _____

Other (Identify) _____

Total _____

(b) What is the additional cost of the state rule?

Current Fiscal Year

General Revenue _____

Federal Funds _____

Cash Funds _____

Special Revenue _____

Other (Identify) _____

Total _____

Next Fiscal Year

General Revenue _____

Federal Funds _____

Cash Funds _____

Special Revenue _____

Other (Identify) _____

Total _____

5. What is the total estimated cost by fiscal year to any private individual, private entity, or private business subject to the proposed, amended, or repealed rule? Please identify those subject to the rule, and explain how they are affected.

Current Fiscal Year

\$ _____

Next Fiscal Year

\$ _____

6. What is the total estimated cost by fiscal year to a state, county, or municipal government to implement this rule? Is this the cost of the program or grant? Please explain how the government is affected.

Current Fiscal Year

\$ _____

Next Fiscal Year

\$ _____

7. With respect to the agency's answers to Questions #5 and #6 above, is there a new or increased cost or obligation of at least one hundred thousand dollars (\$100,000) per year to a private individual, private entity, private business, state government, county government, municipal government, or to two (2) or more of those entities combined?

Yes No

If yes, the agency is required by Ark. Code Ann. § 25-15-204(e)(4) to file written findings at the time of filing the financial impact statement. The written findings shall be filed simultaneously with the financial impact statement and shall include, without limitation, the following:

- (1) a statement of the rule's basis and purpose;
- (2) the problem the agency seeks to address with the proposed rule, including a statement of whether a rule is required by statute;
- (3) a description of the factual evidence that:
 - (a) justifies the agency's need for the proposed rule; and
 - (b) describes how the benefits of the rule meet the relevant statutory objectives and justify the rule's costs;
- (4) a list of less costly alternatives to the proposed rule and the reasons why the alternatives do not adequately address the problem to be solved by the proposed rule;
- (5) a list of alternatives to the proposed rule that were suggested as a result of public comment and the reasons why the alternatives do not adequately address the problem to be solved by the proposed rule;
- (6) a statement of whether existing rules have created or contributed to the problem the agency seeks to address with the proposed rule and, if existing rules have created or contributed to the problem, an explanation of why amendment or repeal of the rule creating or contributing to the problem is not a sufficient response; and
- (7) an agency plan for review of the rule no less than every ten (10) years to determine whether, based upon the evidence, there remains a need for the rule including, without limitation, whether:
 - (a) the rule is achieving the statutory objectives;
 - (b) the benefits of the rule continue to justify its costs; and
 - (c) the rule can be amended or repealed to reduce costs while continuing to achieve the statutory objectives.



Arkansas Department of Education
Division of Career and Technical Education
Preparing Students for Future College and Career Success

January 15, 2026

Proposed Rules Governing Arkansas Adult Diploma Program

Purpose

The Division of Career and Technical Education of The Department of Education is seeking approval of the proposed amendments to the Division of Career and Technical Education's Rules Governing the Arkansas Adult Diploma Program.

Background

Pursuant to Ark Code § 6-44-302 the Arkansas Adult Diploma Program was established in 2023 and directed the division to establish the payment amount for the completion of milestones. Act 502 of 2023 increased the amounts established by the ADE and set those amounts in statute.

Summary of Amendments

This amendment to the Arkansas Adult Diploma Program updates the text of the rule to implement the changes made by Act 502 of 2023. The only deviation from the statutory text is to address an ambiguity in the statutory language. This was necessary because in the definition of milestone, the statutory text provided for a milestone for workforce services credentials that is less than 50 hours and another that was between 51 hours and 100 hours. This left a 50 hour workforce credential omitted from the definition. In section 4 of the act the opposite issue pertained in that a 50 hour workforce credential was defined as both a \$250 milestone and a \$500 milestone. The language of the rule harmonized the definition and the payment structure with a 50 hour workforce credential compensated at \$500. There were no other deviations from the statutory text.

Public Comment

No changes were made based on public comments.

Proposed Rulemaking

Title

Promulgated by:
Division of Career and Technical Education

Title 6. Education

**Chapter 11. Division of Career and Technical Education, Department of
Education**

Subchapter A. Generally

Part 301. Rule Governing the Arkansas Adult Diploma Program

Subpart 1. Generally

6 CAR § 301-101. Definitions.

As used in this part:

- (1) "Academic skill intake assessment" means a criterion-referenced assessment of numeracy and literacy skills with high reliability and validity as determined by third-party research that is administered in person or online;
- (2) "Accredited" means an entity that holds an active accreditation from:
 - (A) One (1) of the following regional accrediting organizations in the United States:
 - (i) Middle States Commission on Higher Education;
 - (ii) New England Association of Schools and Colleges;
 - (iii) Higher Learning Commission;
 - (iv) Northwest Commission on Colleges and Universities;
 - (v) Southern Association of Colleges and Schools Commission on Colleges;
 - (vi) Accrediting Commission for Schools Western Association of

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Schools and Colleges;

(vii) Accrediting Commission for Community and Junior Colleges; or

(viii) Any successor entities or consolidation or merger of any of the regional accreditors in the United States; or

(B) Cognia;

(3) "Adult dropout recovery services" means any type of assistance provided to a diploma-seeking student, including without limitation:

- (A) Sourcing, recruitment, and engagement;
- (B) Learning plan development;
- (C) Active teaching; and
- (D) Proactive coaching and mentoring;

(4) "Approved program provider" means a public, nonprofit, or other entity that satisfies the requirements of 6 CAR § 301-102(b);

(5) "Average cost per graduate" means the:

(A) Total amount of Arkansas Adult Diploma Program funding disbursed to an approved program provider for a cohort through the end of the measurement period; divided by

(B) Total number of graduates from the cohort during the measurement period;

(6) "Career advising services" means services designed to assist a student in obtaining employment, including without limitation resume development and mock interviews;

(7) "Career pathways coursework" means one (1) or more courses that help a student enter into or advance within a specific occupation or occupational cluster;

(8) "Coaching" means proactive communication between an approved program provider and a student related to the student's pace and progress throughout his or her learning plan;

(9) "Cohort" means the group of students who enter the program between July 1 and June 30 of each program year;

(10) "Employability skills certification" means a certificate earned by students

demonstrating professional nontechnical skills through assessment, including without limitation the program standards of the United States Department of Labor's "Skills to Pay the Bills: Mastering Soft Skills for Workplace Success";

(11) "Graduate" means a student who has successfully completed all of the approved program provider requirements in order to obtain a high school diploma;

(12) "Graduation rate" means the:

(A) Total number of graduates from a cohort who graduated during a measurement period; divided by

(B) Total number of students included in the same cohort;

(13) "Graduation requirements" means Arkansas course and credit requirements needed to earn a high school diploma from an approved program provider;

(14)(A) "High school diploma" means a diploma issued by an accredited institution.

(B) A high school diploma issued under this part is recognized as a secondary school diploma by this state;

(15) "Learning plan" means a documented plan for courses or credits needed for each individual in order to complete the program and to fulfill the graduation requirements of an approved program provider;

(16) "Measurement period" means the two-year period beginning July 1 of the year the cohort begins through June 30 of the subsequent state fiscal year;

(17) "Mentoring" means a direct relationship between a coach and a student to facilitate the completion of the student's learning plan designed to prepare the student to succeed in the program and the student's future endeavors;

(18) "Milestones" means the objective measures of progress for which payment is made to an approved program provider under this part, including:

(A) Earned units of high school ~~credit credits whereby a unit of high school credit equals one half (1/2) credit~~;

(B) Attainment of an employability skills certification;

(C) Attainment of a workforce credential ~~that requires less than fifty (50)~~

hours of training; and

(D) Attainment of a workforce credential that requires between fifty (50) and one hundred (100) hours of training;

(E) Attainment of a workforce credential that requires over one hundred (100) hours of training; and

~~(D)~~E) Attainment of an accredited high school diploma;

(19) "Request for qualifications" means a request for interested public, nonprofit, or other entities to submit evidence that the entity meets the qualifications in 6 CAR § 301-102(b), and if confirmed by the Department of Education, that the requestor is an approved program provider;

(20) "Student" means a participant in the program who:

- (A) Is twenty-one (21) years of age or older;
- (B) Is a resident of the State of Arkansas; and
- (C) Has not earned a high school diploma;

(21) "Transcript evaluation" means a documented summary of credits earned in previous public or private accredited high schools compared with the program and approved program provider graduation requirements;

(22) "Unit of high school credit" means one half (1/2) high school credit awarded based on a student's demonstration that he or she has successfully met the content expectation for the credit area as defined by subject area standards, expectations, or guidelines; and

(23) "Workforce credential" means a third-party credential that is:

(A) Part of a sequence of credentials that can be accumulated over time to build an individual's qualifications to advance along a career pathway; or

(B) A credential that:

- (i) Verifies an individual's qualification or competence; and
- (ii) Is:

(a) Issued by a third party with the relevant authority to issue the credential; or

(b) Aligned with high-wage, high-growth jobs in Arkansas as

defined by the Arkansas Workforce Development Board.

6 CAR § 301-102. Approved program providers.

(a) Annually by August 15, the Department of Education shall issue a request for qualifications for public, nonprofit, or other entities to apply to become approved program providers and participate in the Arkansas Adult Diploma Program.

(b) To become an approved program provider, the entity must:

(1) Be a regionally accredited high school diploma-granting entity;
(2) Have a minimum of two (2) years of experience providing adult dropout recovery services;

(3) Provide a course catalog that includes all courses necessary to meet Arkansas graduation requirements; and

(4) Have the ability to:

(A) Provide academic skill intake assessments and transcript evaluations;
(B) Develop a learning plan for each student that integrates graduation requirements and career goals;
(C) Provide remediation opportunities in literacy and numeracy;
(D) Provide an employability skills certification;
(E) Provide career pathways coursework;
(F) Provide preparation for workforce credentials; and
(G) Provide career advising services.

(c)(1) The department shall announce the approved program providers no later than October 15 annually.

(2) Upon the announcement of approval, an approved program provider may begin enrolling students starting no later than November 15 each year.

(3)(A) Approved program providers who have operated adult education programs for two (2) years or more shall submit to the department a roster for the previous two (2) years of enrolled students, as defined by 6 CAR § 301-101(20).

(B) Approved program providers who have operated for fewer than two (2) years shall submit documentation for relevant experience.

6 CAR § 301-103. Funding and payments.

~~(a) An approved program provider may receive reimbursement for an enrolled, eligible student who meets the milestones as defined in 6 CAR § 301-101(18), according to the chart listed in Appendix A.~~

~~(b)~~a An approved program provider shall not receive funding for a student under this part if the approved program provider also receives federal or state funding or private tuition specifically for the student.

~~(b)~~a An approved program provider shall:

~~(1) Receive reimbursement for an enrolled, eligible student who meets the milestones defined in Arkansas Code § 6-44-302 and this part; and~~

~~(2) Invoice only for course and credit requirements needed to earn a high school diploma from an approved program provider that may include additional courses that meet workforce credential requirements.~~

~~(c) The Department of Education shall pay an approved program provider the following amounts for each student who completes the following milestones:~~

~~(1) Two hundred fifty dollars (\$250) for each:~~

~~(A) Completed one-half (1/2) high school credit;~~

~~(B) Completed employability skills certification; and~~

~~(C) Earned workforce credential that requires less than fifty (50) hours of training;~~

~~(2) Five hundred dollars (\$500) for each earned workforce credential that requires at least fifty (50) hours but no more than one hundred (100) hours of training;~~

~~(3) Seven hundred fifty dollars (\$750) for each earned workforce credential that requires more than one hundred (100) hours of training; and~~

~~(4) One thousand dollars (\$1,000) for each earned high school diploma.~~

~~(c)(1) Once a program provider enrolls a student into its program, it shall provide the Department of Education an anticipated cost of completion of the program for that student.~~

~~(2) The program provider shall provide the department with an updated~~

anticipated cost of completing the program after each year the student completes.

(3) The department will reserve funds for that student while the student is enrolled in a program with an approved program provider.

(d)(1) An approved program provider shall submit requests for reimbursement invoices to the department no later than the tenth calendar day of each month for milestones met in the previous calendar month under the Arkansas Adult Diploma Program.

(2) An approved program provider shall include with its reimbursement request a roster of students who received services in the previous calendar month for which reimbursement was requested.

(e)(1) The department shall pay approved program providers in the order in which invoices are submitted until all available funds are exhausted.

(2) Once all available funds are exhausted under subdivision (e)(1) of this section:

(A) The department shall notify all approved program providers that funds are exhausted; and

(B) Approved program providers shall immediately stop enrolling new students.

(3) Once all available funds are exhausted, an approved program provider can no longer request reimbursement for enrolled students.

(4) For purposes of this part, "exhausted funds" includes funds that have been expended and funds reserved that are necessary for the anticipated cost of completion of the program per student.

(f) The department shall provide a written update to an approved program provider by the last calendar day of each month, including without limitation the:

(1) Aggregate total dollars per student that have been paid to the approved program provider to date; and

(2) Estimated number of enrollments still available for the program year.

6 CAR § 301-104. Accountability.

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(a) After the close of the second fiscal year of the Arkansas Adult Diploma Program and each year thereafter, the Department of Education shall review data from each approved program provider to ensure that each approved program provider is achieving minimum performance standards under the program, including:

- (1) Minimum of fifty percent (50%) graduation rate for each cohort's measurement period; and
- (2) Average cost per graduate of seven thousand dollars (\$7,000) or less for each cohort's measurement period.

(b)(1)(A) The department shall place an approved program provider that does not meet the minimum program performance standards in 6 CAR § 301-102(b) and subsection (a) of this section on probationary status for the remainder of the fiscal year.

(2B) An approved program provider placed in probationary status under this subsection (b)(1)(A) will be required to submit an improvement plan to the department.

(c) An approved program provider that does not meet the minimum performance standards and fails to improve performance under its improvement plan for two (2) consecutive years shall be removed from the approved program provider list.

6 CAR § 301-105. Reporting requirements.

(a) On or before August 15 of the second fiscal year of the Arkansas Adult Diploma Program and each year thereafter, each approved program provider participating in the program shall report the following metrics to the Department of Education and to the Office of Skills Development of the Department of Commerce:

- (1) Total number of students for whom the approved program provider has received payments under the program;
- (2) Total number of one-half high school credits earned by students for whom the approved program provider is receiving payments under the program;
- (3) Total number of employability skills certifications issued to students for whom the approved program provider is receiving payments under the program;
- (4) Total number of workforce credentials earned, and the number and type of credential earned by each student, for each type of funding under 6 CAR § 301-103(a)

by students for whom the approved program provider is receiving payments under the program;

(5) Total number of students for whom the approved program provider is receiving payments under the program who receive high school diplomas;

(6) Average cost per graduate for the cohort for which the measurement period ended in the prior fiscal year of the state and an updated average cost per graduate for any previous cohort for which the measurement period has ended but a student from the cohort achieved one (1) of the milestones described in 6 CAR § 301-104(a) in the prior fiscal year of the state; and

(7) Graduation rates for the cohort for which the measurement period ended in the prior fiscal year of the state and updated graduation rates from any previous cohort for which the measurement period has ended but a student from the cohort achieved one (1) of the milestones described in 6 CAR § 301-104(a).

(b) On or before August 15 after the conclusion of the first measurement period of the program and each year thereafter in which payments under the program were dispersed for the prior fiscal year of this state, each approved program provider that received payments under 6 CAR § 301-103 for the preceding fiscal year shall report the metrics in this section by cohort to the Department of Education.

Appendix A. Milestone Reimbursement Rates

Link:

<https://CodeOfARRules.arkansas.gov/does/CARCodeAppendices/Appendices/164/6CARpt.301Appendix.pdf>

DIVISION OF CAREER AND TECHNICAL EDUCATION
RULES GOVERNING THE ARKANSAS ADULT DIPLOMA PROGRAM
PUBLIC COMMENTS AND RESPONSES

Commenter Name: Dr. Dennis Felton Jr., Vice President of School Operations, Responsive Education Solutions, Inc.-Arkansas, Executive Director, Arkansas Works

Comments: *Submitted Electronically and in person*

In Person public comment transcript (December 2, 2025): OK. My name is Dr. Dennis Felton, Jr. I serve as the vice president of school operations for Responsive Aid Arkansas, as well as our executive director of our adult ed program, which we call Arkansas Works. upon review of the proposed rulemaking we are excited about the new changes and believe that some of the changes will assist organizations like responsibly in their ability to be able to attract dropout recovery adults and put them on the path to be able to achieve a high school diploma one of the things that we want to recommend to the state to consider making exception is waiving the additional graduation requirements that are currently necessary for adults to be considered a high school graduate in Arkansas we believe that these requirements were originally based on traditional high school students and May pose barriers to adult learners particularly those engaged in a dropout recovery program all graduates should be required to meet the 22 credit fulfillment as far as me graduation requirements. However, we are seeking that they would take in consideration waiving the additional graduation requirements. And so I do have those graduation requirements outlined. And this also would apply for only the adults in the program, which are over the age of 21. One is a digital learning course credit which is outlined in ACA 616-1406. The other one is the personal and family finance course where students must earn a credit in a course that includes personal and family finance in grades 9 through 12 which is outlined in ACA 616-135. The other one is that students must p*** the Arkansas civics exam which is outlined in ACA 616 149 the other requirement is CPR training students must complete CPR training which is outlined in ACA 616 143 and then the last requirement is the computer science course requirement which beginning will begin at 22 23 school year where public high school student shall be required to earn at least one unit of credit in an ADE-approved high school computer science course before graduating, which is outlined in ACA 616-152. Also want to express our concerns in regards to the graduation rate calculation and want there to be consideration in the proposed rulemaking as far as how is that graduation rate calculated within the adult diploma program. It has come to our attention that the rules do not explicitly define what constitutes the graduation rate. However, it does have it set up where there's a cohort that enters an adult ed program. And then after a certain measurement period, the providers report back the individuals that graduated from the program based on the individuals they receive funding for. and we understand that graduating adults within a small physical period especially within one or two years could become difficult because of the individual circumstance the educational needs of those individuals and so like in a traditional setting you May have an adult that comes in that maybe does need a half a year a year worth of credit to get done but then there are adults they have minimum credits that are attained

towards high school diploma, which it May take multi-years in order to be able to achieve and fulfill the graduation requirements. And so the Carington System relies on a cohort model that kind of determines funding based on the number of participants each year. However, in our experience, this approach does not accommodate the unique situations of adult learners who May need extended period of time to complete their education requirements we strongly advocate for allowing providers to place adults in cohort to extend up to four years and potentially not be penalized from a graduation rate perspective for those entered in that cohort this flexibility will enable us to create personalized graduation plans that will be aligned to the specific needs of each learner ultimately supporting their journey towards high school receiving a high school diploma So we appreciate your consideration of this request and these recommendations and look forward to how we can continue to discuss this and better support our adult learners in Arkansas. Thanks, sir. I believe I heard you mention you May have had some written dot. You can also provide those. Do I give those to you or do I submit it online? Okay, that'll be fine. We'll have it then. Yes, sir.

Email and Attachment (November 21, 2025): To whom this may concern, I am writing to submit our public comment concerning the Rules Governing the Arkansas Adult Diploma Program (Amendment). Please find our comments attached for your review. Thank you for considering our input

Attached public comment pdf.

Division Response: Comment considered, no changes made. The comment requests policy changes beyond the scope of the current proposed draft. The Division will consider the recommended policy for future rulemaking.

Responsive Education Solutions, Inc. - Arkansas
400 Hardin Road Suite 120
Little Rock, AR 72211

To: Arkansas Department of Education | Division of Career & Technical Education

Subject: Public Comments for AR Adult Ed Diploma Program

Date: November 2025

Overview

ResponsiveEd Arkansas (AR approved program provider) is recommending that the state make an exception and waive certain additional graduation requirements that are currently necessary for adults to be considered a “high school graduate” in Arkansas. We believe that these requirements were originally established for traditional high school students and may pose barriers to adult learners, particularly those engaged in dropout recovery programs. All graduates will be required to meet the twenty-two (22) credits needed to fulfill graduation requirements. Below are the specific graduation requirements we request to be waived solely for the AR Adult Diploma Program.

Graduation Requirements for Waiver

We propose the waiver of the following graduation requirements for adults over the age of 21:

1. **Digital Course Requirement:** Students must complete a digital course for credit (A.C.A. § 6-16-1406).
2. **Personal and Family Finance Course:** Students must earn a credit in a course that includes Personal and Family Finance in grades 9-12 (A.C.A. § 6-16-135).
3. **Arkansas Civics Exam:** Students must pass the Arkansas Civics Exam (A.C.A. § 6-16-149).
4. **CPR Training:** Students must complete CPR training (A.C.A. § 6-16-143).
5. **Computer Science Course Requirement:** Beginning with the entering ninth-grade class of 2022-2023, a public high school student shall be required to earn one (1) unit of credit in an ADE-approved high school computer science course before graduating (A.C.A. § 6-16-152).

Concerns Regarding Graduation Rate Calculation

I would like to express our concerns about the current graduation rate calculation as outlined in the Rules Governing the Arkansas Adult Diploma Program. It has come to my attention that the rules do not explicitly define what constitutes the graduation rate, which raises significant challenges for both providers and participants.

Graduating adults within a single fiscal year can be exceptionally difficult due to various factors, including individual circumstances and educational needs. The current system relies on a cohort model that determines funding based on the number of participants each year. However, this approach does not accommodate the unique situations of adult learners who may require more time to complete their education.

I strongly advocate for allowing providers to place adults in a cohort that extends up to four years. This flexibility would enable us to create tailored graduation plans that align with the specific needs of each adult learner, ultimately supporting their journey toward graduation more effectively.

We appreciate your consideration of this request and look forward to discussing how we can better support adult learners in Arkansas.

Thank you for your attention to this important matter.

Sincerely,

Dr. Dennis Felton Jr.

Vice President of School Operations, ResponsiveEd Arkansas

Executive Director, Arkansas Works