



CONWAY PUBLIC SCHOOLS
OFFICE OF THE SUPERINTENDENT
Greg Murry, Ed.D.

May 6, 2021

Stephanie Isaacs
Associate Director, Office of Skills Development
Arkansas Department of Commerce
One Commerce Way, Suite 604
Little Rock, AR 72202

Ms. Isaacs:

It is my understanding that “Rules for Secondary Technical Centers” will be presented to the Career Education and Workforce Development Board for approval. It is also my understanding that the Office of Skills Development is accepting public comments at this time regarding these proposed rules. Please accept my comments below regarding the proposed rules. My comments will focus on Section II A - Funding which is found on page 4.

- In paragraph 5, it is noted that a local program’s carryover will not be able to exceed 20%. We would, of course, prefer that this 20% cap not be in play. A few years back, our local center received a significant mid-year funding cut. The carryover was reduced by approximately \$200,000 that year due to that cut. If it is indeed a philosophical certainty of the Board to put this cap in play, I would respectfully ask that a graduated approach to the 20% mark be implemented. If there is a sharp cliff approaching of loss of funding, centers will by nature want to spend the excess and do so quickly. I’ve not seen universal wisdom in people who are required to spend large amounts of dollars quickly. May I suggest that if there will indeed be a carryover cap, that a three-year phase-in be implemented as follows: 30% for 21-22, 25% for 22-23, and 20% for 23-24?
- The proposed rules state at the end of paragraph 5 that the remaining balances above 20% will be returned to the public school fund. The wording is curious as any excess funding will go back into a fund that is expended at the discretion of the ADE. (Perhaps I don’t correctly understand the contextual usage of “public school fund.”) I would have thought that the excess funds would have gone directly into Career Education. If the intent is indeed for the excess funds to be “reused” by the OSD, I

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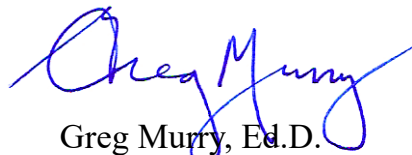
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would suggest different wording. If it is returned to the OSD, how will that money be redistributed and for what purpose?

- In paragraph 3, authority is given for mid-year funding corrections to be made. No conditions are set on when those mid-year corrections might be appropriate. During significant economic downturns any number of measures might be understandably necessary to balance budgets. However, to ask a local center to establish a budget based on expected funding while worrying as to whether funding will change mid-year is not reasonable, especially since carry-over allowances are also being reduced. I would respectfully suggest that conditions be specified as to when a mid-year correction might be necessary. Otherwise, centers will have unnecessary concerns and worries related to potential mid-year funding cuts.
- In paragraph 2, a multiplier is proposed for smaller centers. Housing a larger center on our campus will clearly jade my view of this change. Is there information or data that shows that a smaller center inherently needs more per-student funding to provide services? If so, I'm assuming there are hard numbers that are not randomly calculated that will assist in the formulation of the multiplier and that those mathematically determined numbers will, of course, be annually reviewed and recalibrated. This should be spelled out in rules.
- In paragraph 4, it is noted that if there were more funding than was needed that the OSD would under the direction of the CEWDB disperse the excess funding based on need or carry that amount to the next year. How will the CEWDB and/or the OSD determine need? If it is carried forward to the next year, is there a correlated and logical increase in tier funding for all centers the next school year?
- There is no mention of how new programs will be funded. On what basis and authority will start-up funding be distributed if there is no mention of start-up funding in the rules? If carryover funds are significantly reduced, how will a local center be expected to purchase equipment for start-up programs? I can't imagine a center starting a welding program with little or no carry-over and very limited amounts of start-up funding.

Thank you for the opportunity to share my comments. If you have any questions about any points that are raised, please feel free to contact me directly.

Respectfully yours,

A handwritten signature in blue ink that reads "Greg Murry". The signature is fluid and cursive, with a large initial "G" and "M".

Greg Murry, Ed.D.
Superintendent of Schools