

**SUMMARY OF PROPOSED CHANGES TO THE ARKANSAS PUBLIC  
SCHOOL ACADEMIC FACILITY MANUAL, APPENDIX “A” TO  
COMMISSION FOR ARKANSAS PUBLIC SCHOOL ACADEMIC FACILITIES  
AND TRANSPORTATION RULES GOVERNING THE ACADEMIC  
FACILITIES PARTNERSHIP PROGRAM**

---

Arkansas Code Annotation § 6-20-809(d) mandates that the Arkansas Public School Academic Facility Manual be reviewed and updated on an annual basis. This Manual contains uniform standards to guide the planning, design, and construction of new public school academic facilities and additions to existing public school academic facilities. Following is a summary of proposed revisions.

**Changes Made Before Public Comment Period**

- 1. Overall Manual Format**
  - a. 2-column format
    - i. construction standards in left column
    - ii. guidelines in right column
  - b. Page numbering format changed; previous “Sections” now designated as “Chapters”; these Chapters contain Sections correlating to previously numbered sections
  
- 2. Chapter 1 – How to Use This Section renamed How to Use This Manual**
  - a. Removed section 1100, Executive Summary table
  - b. Removed section 1200, Planning, Design, and Construction Process
  - c. Removed section 1300, Definitions
  
- 3. Chapter 2 – Educational Facility Planning Concepts**
  - a. Section 2000 changed from Best Practices to Educational Facility Planning Concepts Introduction
    - i. Section 2000 has been, largely, rewritten to better address the subject matter
  - b. Section 2100 – Special Education has been moved to Chapter 3

- c. Section 2200 – Workforce Development has been moved to Chapter 3

**4. Chapter 3 – Educational Framework**

- a. Section 3000 Principles renamed Educational Framework
- b. Removed references to pre-K
- c. Section 3000, changed “Workforce Development” to “Career Education”
- d. Added new Section 3100, “High Performance Learning Environments”
- e. Added new Section 3200, “Special Education” (*moved from Chapter 2, Section 2100*)
  - i. Removed Definition of Terms
- f. Added new Section 3300, “Career Education” (*moved from Chapter 2, Section 2200; renamed from previous Workforce Development*)

**5. Chapter 4 – Site Guidelines, renamed Site Selection and Design**

- a. Merged sections 4000, 4100, and 4200 into one Section 4000
- b. Removed prescriptive site dimensions that were deemed directive in nature, rather than guidelines. Site selection, by each district, is unique to their local needs.

**6. Chapter 5 – Program of Requirements (POR) [Bracketing], renamed Program of Requirements**

- a. Removed the previous POR form graphics and added the hyperlink to the actual form, located on the Division’s website
- b. Added Health Center restroom (*45 square feet*) as required space.

**7. Chapter 6 – Program Space Guidelines**

- a. Removed pre-K throughout
- b. Replaced ‘chalkboard’ with ‘marker board’, which includes white boards and smart boards
- c. Space plates and standards are, largely, unchanged

**8. Chapter 7 – Building Systems**

- a. Section 7000 – Introduction
  - i. Removed “Green Building Design (optional)” from standards

- b. Added new Section 7050 – Civil Sitework
- c. All 7000-series sections
  - i. Incorporated Advisory Committee recommendations for clarifications and/or changes to design and construction technical specifications

**9. Former Section 3 – Custodial and Maintenance – *Removed***

- a. This section will be provided as a stand-alone document, through the Division’s website

**10. Former Section 4 – Furniture, Fixtures, and Equipment Procurement – *Removed***

- a. This section will be provided as a stand-alone document, through the Division’s website

**11. Former Section 5 – Technology – *Removed***

This section was primarily definitions of technology staff roles and job descriptions; deemed outside the scope of this.

**Changes Made After Public Comment Period**

Chapter 5:

In the POR (“Program of Requirements”), spaces previously designated as “Workforce Development” were changed to “Career Education.” Also, on the suitability analysis page, an extra column was added for applicants to distinguish between Single-Purpose Areas added before 2008 and those added after 2008 to provide clarity. Neither of these revisions change the POR calculation.

Also, the numbering was changed on pages four through eleven of the POR. The content of the pages remained the same, however, and this renumbering in no way modified the Program of Requirements.

Chapter 7, Section 7050

Page 1: Changed sentence to allow drawings to be prepared in .pdf format or AutoCAD DWG (previously language allowed only AutoCAD DWG).

Page 2: Changes sentence “[t]he enclosure will require a pair of gates on the “open” side to screen the dumpster interior and provide access,” to “[t]he enclosure will be gated on the “open” side to screen the dumpster interior and provide access.”

Chapter 7, Section 7100

Page 1: Change prohibits use of calcium chloride in concrete (for foundations and floor slabs at grade).

Chapter 7, Section 7120

Page 4: Changes term "Pre-Case" to "Pre-Cast." Also removed as a standard use of paint or skim-coat plaster on interior surfaces.

Chapter 7, Section 7130

Page 5: Regarding metal roofing with blanket insulation, changed component from "Galvanized steel purlins" to "Factory primed or galvanized steel purlins." Also removed from components section "[s]olid substrate with ice/water shield moisture barrier recommended."

Page 6: Under construction standards for metal roof with blanket insulation, change sentence "[t]hermal spacers where panels attach directly to purlins" to "[p]rovide break where panels attach directly to purlins."

Chapter 7, Section 7160

Page 1: Previous draft deleted as an interior floor finish "hardwood." Hardwood now added as an example of interior floor finishes.

Chapter 7, Section 7170

Page 3: Noise Reduction Coefficient changed from .65 to .55 for acoustical ceilings and panels.

Chapter 7, Section 7400

Page 3: Regarding lighting standards, requirement for "energy-efficient and high efficiency fluorescent light fixtures utilizing low harmonic electronic ballasts and low-mercury certified lamps" changed to "energy-efficient and high-efficiency light fixtures."

Page 12: Changed Electric "Outlet Locations" to "Recommended Device Locations."

Chapter 7, Section 7500

Page 1: Removed as a standard that a technology system plan and specifications shall be prepared "as part of the overall building design process before construction begins," and that "[i]t shall be designed and approved by a Registered Communications Distribution Designer (RCDD)." Replaced that standard with a Guideline reading "[t]he Technology System Plan and Specification should be designed and approved by a Registered Communications Distribution Designer (RCDD)."

## **Changes Made After Second Public Comment Period**

The following non-substantive changes were made after the second public comment period:

### Chapter 4

Accessible parking spaces specifically added as required by the Americans with Disabilities Act.

### Chapter 6, Sections 6103 (pg. 15, 18), 6203 (pg. 15, 18) and 6303 (pg. 16, 20).

In Health Clinic, "sharps container" added as Fixed Equipment, and note added that "[r]estroom must be located adjacent to health clinic with entrance from the health clinic."

In Health Center Restroom, note added "[r]estroom must be located adjacent to health clinic with entrance from the health clinic."

PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES

FIRST PUBLIC COMMENT PERIOD

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Verlon P McKay II, FCSI	Team facilities guideline comments. I am a commercial kitchen planner. I want to make sure that in the commercial kitchens that space is allocated for the a office, bathroom and janitors closet. The bathroom and janitors closet is required by code in the "Arkansas board of health rules and regulations pertaining to food establishments".	No change		Comment considered. Included in support spaces. No change.
11/10/14	Dawn Shafer, Interior Designer	6101 Elementary Academic Core: E-AC-3 and E-AC-7 Kindergarten Classroom and Elementary Classroom: -Requiring a plumbing sink with drinking fountain. Per Plumbing Codes we cannot have a sink and a drinking fountain in one. We have been providing a separate drinking fountain within these classrooms and a separate plumbing sink. It would be better for this to read plumbing sink and drinking fountain. School Districts do not know the codes- and in existing conditions they believe the two-in-one is still able to be used.	No change	6101	Comment considered. Code Review will determine. No change.
11/10/14	Dawn Shafer, Interior Designer	6101 Elementary Academic Core: - E-AC-7 Kindergarten Restroom: - Requires 2'-0" x 5'-0" mirror. We have provided this above the sink and it seems a bit too tall for use. If the idea is for a full height mirror- the requirement may be better to read two mirrors- one 2'-0" x 5'-0" for full height viewing along with the sink mirror max 4'-0" to still accommodate for taller teachers.	No change	6101	Comment considered. Design description. No change.
11/10/14	Dawn Shafer, Interior Designer	6103 Elementary Administration: E-AD-2 Secretary Areas: -Requires high counter. For Universal Design we like to provide a low counter for ADA accessibility as well.	No change	6103	Comment considered. Design description. No change.
11/10/14	Dawn Shafer, Interior Designer	6109 Elementary Food Service: E-FS-2 and E-FS-1 Kitchens: - Additional Areas to be added: office, Restroom, locker room, and janitor closet. These areas are needing to be added per code for at least restrooms and janitor closet area....per design criteria and design standards; consultants add the office and locker room for the kitchen layout. It would be best if these spaces are designated in the POR as required spaces and given sq footages that are funded by facilities in addition to the kitchen square footage.	No change	6109	Comment considered. Included in support spaces. No change.
11/10/14	Dawn Shafer, Interior Designer	Occupancy Sensors RR- Requiring occ sensors in restrooms for the smaller age children (including Kindergarten and possibly First) are not practical because they are not big enough to trigger these sensors. Sometimes this may cause panic and distress.	No change		Comment considered. Available by variance. No change.
11/10/14	Dawn Shafer, Interior Designer	Interior Occupancy Sensors required- Requiring occ sensors are perfect for the classrooms and areas to conserve electricity- but better design would be where required the occ sensors should be ceiling mounted and not wall mounted. The teacher spaces and furniture tend to cover the wall mounted sensors and cannot detect motion.	No change		Comment considered. Design description. No change.

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dawn Shafer, Interior Designer	Exit Lights- shall be wall mounted, in lieu of ceiling mounted. Ceiling mounted provides for dual visual in hallways and at doors. Ceiling mounted is really a better look and design. Painting and maintenance does not have to paint around fixtures. No patching of block walls if additions to buildings take place in the future.	No change		Comment considered. Design descrition. No change.
11/10/14	Dawn Shafer, Interior Designer	Electrical Outlet Mounting Heights- Toggle Switches: Please reconsider the toggle switch height to coordinate with other electrical that will be placed at doors and in close proximity to the switches. Per ADA code 48" is maximum height....this means it can be lower than 48" and does not have to be 48" in some cases the maximum is actually 46" if located over millwork with base cabinets. A better design is 44" for universal design and accommodates ADA requirements as well. You are locating all other devices at 44" for your first row of requirements in a "4" mounting height above floor to bottom of outlet box". I would ask that you consider 44" being your max height for lighting switches and other thermostats and pull stations etc. All electrical and outlet device types should line up when placed side by side in height above floor.	Accept		Change title block to "recommended" Device Locations
11/10/14	Dawn Shafer, Interior Designer	Electrical Outlet Mounting Heights- Countertop heights: Per ADA requirements Base Cabinets can only be a maximum of 24" deep and 34" high for side approach. Meaning all cabinets designed for classroom spaces will be maximum with these dimensions. Deeper cabinets or taller cabinets are not accessible. To accommodate for teachers, administrators, and students with needs- requiring or suggesting taller or deeper cabinets- do not accommodate ADA requirements. Also upper cabinet requirements have requirements that affect design of millwork. As designers, we have to provide a section that is ADA accessible and at least one of everything that is provided has to also be ADA accessible. Open shelving, base cabinets, upper cabinets, countertops, etc.	Accept		Change title block to "recommended" Device Locations
11/10/14	Dawn Shafer, Interior Designer	Electrical Outlet Mounting Heights- Countertop electrical heights: if our max is 24" deep and 34" high for our millwork- our maximum for electrical outlets to top of outlet device is 46" max according to ADA requirements. 44" would be a perfect Universal Height for electrical outlets, switches and other electrical devices.	Accept		Change title block to "recommended" Device Locations
11/10/14	Leslie Dyess	Thank you for the opportunity to submit public comments for the newly proposed rules affecting the AR Public School Academic Facilities Manual. I would request that further consideration be given to the following: Section 7110 (framing systems) item number 6 prohibits the use of calcium chloride in concrete. This exclusion is not included in section 7100 (foundations & floor slabs at grade). Is it intended to be acceptable for calcium chloride to be used in foundation systems?	Accept	7110	Add language in 7100 to exclude calcium chloride

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Leslie Dyess	<p>Section 7130 (shingle &amp; metal roofing systems) performance standards for these two types of roofing systems state that they should have "energy star compliant surface treatments". To my knowledge, this energy star compliance is based on solar reflectance and not all available color options will meet this requirement. The popularity of the metal roofing option is partly driven by the wide range of colors available (purple, blue, red, etc) and requiring energy star compliance for these systems may be considered restrictive in design as highly reflective surfaces are typically white in nature.</p>	No change	7130	Comment considered. Minimum standard. May request variance. No change.
11/10/14	Leslie Dyess	<p>POR (E/MH FS-2) – it has been brought to my attention that the AR State Board of Health has rules and regulations in place that require a toilet &amp; custodial closet with mop sink be provided for the kitchen area. It seems appropriate to include these areas on the POR as E/MH FS-2f (toilet) &amp; E/MH FS-2g (custodial closet).</p>	No change		Comment considered. Included in support spaces. No change.
11/10/14	Mike Mertens, Arkansas Association of Educational Administrators	<p>The following comments are submitted by the Arkansas Association of Educational Administrators (AAEA) in response to the proposed changes to the Public School Academic Facility Manual. Chapter 2, Page 1-2. While school districts have specific submittal dates for preliminary and final master plan reports, the Manual does not include specific dates for the Division to conduct the consultation meetings. The manual states that the Division will hold these meetings "as soon as practicable" and sometime in the "summer or fall." AAEA recommends a date of November 1 for all of these consultation meetings to be held in order to give school districts ample time to meet the February 1 date for the final master plan.</p>		Ch 2, Pg 1-2	Comment considered. Scheduling 236 school districts on one day cannot be done. Flexibility required. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	<p>Chapter 7, Section 7050 – Civil Sitework, Page 1, #2. Include the words "or similar" after AutoCAD DWG. A requirement for the use of specific software is not necessary and could be costly.</p>	Accept	7050	Insert "or .pdf" before "format".
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	<p>Chapter 7, Section 7050 – Civil Sitework, Page 2, #3. Include the words "main or primary" before entry doors in the first line. Sidewalks should not be required for all entry doors such as a doorway that leads to and from a school playground. Also in this same section, the term "street" in a urban setting may be entirely different than a "stireet" in a rural settings. "Driveway or school drive" may be a more appropriate term.</p>	No change	7050	Comment considered. Request variance if desired. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	<p>Chapter 7, Section 7050, Page 2, #4. Include the words "at trash truck collection points" after trash enclosure at the beginning of the sentence. All trash enclosures should not be subject to these strict guidelines.</p>	Accept	7050	Change "require a pair of gates" to "be gated"



**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	Chapter 7, Section 7050, Page 2, #5. The standards for curbing should be a guideline and left to the discretion of the design professional in consultation with the local school district.	No change	7050	Comment considered. Required standard for storm water flow. Variance may be requested. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	Chapter 7, Section 7050, Civil Site Work. Site design and geotechnical analysis should be the call of the architect and structural engineer. There should not be a requirement that this work be done by a civil engineer and/or geotechnical engineer. Parking design should be controlled by city codes if they exist. Required curbing on ALL paving edges should not be required and would be a waste of State and local money. Building pad and sub-grade should be the responsibility of the architect and structural engineer, not the geotechnical engineer.	No change	7050	Comment considered. Geotechnical Engineer licensed expert in this area. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	Chapter 7, Section 7100, Foundation and Floor Slabs. Requiring the structural engineer to meet requirements of the geotechnical engineer is in conflict with the person required to certify the overall plans.	No change	7100	Comment considered. Geotechnical Engineer licensed expert in this area. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	Chapter 7, Section 7110, Framing Systems. Not all structural framing requires a structural engineer. The size of the project matters.	No change	7110	Comment considered. See ACA 22-9-101. No change.
11/11/14	Mike Mertens, Arkansas Association of Educational Administrators	Chapter 7, Section 7140, Openings. The requirement that interior doors have factory finish should be removed. Field finish is acceptable and in some case preferred. AAEA appreciates the opportunity to submit comments regarding the proposed changes in the Facility Manual and respectfully requests that these comments be carefully considered.	No change	7140	Comment considered. Factory finish more consistent. Required for new buildings only. No change.
11/10/14	Dr. Benny Gooden	The following comments are submitted in response to the proposed changes to the Public School Academic Facility Manual which accompanies COM-15-028. Although the proposed changes have been characterized by some staff members of the Department of Public School Academic Facilities and Transportation as primarily associated with "reformatting", a closer examination reveals that the revisions to the Manual are far more than mere reformatting and will assuredly result in significantly increased costs to local school districts as facilities are improved in Arkansas. When reviewing the lengthy document, several major areas of concern emerge. These include:	No change		Comment only by author. No change.

PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	<p>1000-Chapter 1, Page 2 The Arkansas School Facility Manual APSAFM is the exclusive property of the Arkansas Department of Education of the State of Arkansas, and the Arkansas Department of Education DPSAFT, who reserves the right to add, delete, modify, or otherwise change the content of this manual at any time. If the Division reserves the right to change the standards at any time without public comment, the process of analysis and comment seems to be fruitless. This process appears to disregard the requirements of the Administrative Procedures Act in its present form. It also is not consistent with the recently-approved requirement for legislative review of agency rules.</p>	No change	1000	Comment considered. Changes to Facilities Manual comply with Rule and Statute. No change.
11/10/14	Dr. Benny Gooden	<p>2000-Chapter 2, Page 1 • February 1 of each odd-numbered year-- districts must submit a master plan report and preliminary master plan for the upcoming final master plan submission. Are changes allowed between the submission of the preliminary and final master plan? The time frame between the preliminary and final master plan submittal is so long as to prevent districts from properly addressing emerging needs within the process. The division shall establish procedures and timelines for a school district to submit a preliminary facilities master plan or a master plan outline to the division before the submission of the school district's final facilities master plan. This requirement fails to require presentation of new rules within the parameters of the Administrative Procedures Act.</p>	No change	2000	Comment considered. Districts may amend Master Plan as needed. No change.
11/10/14	Dr. Benny Gooden	<p>Is the above chart a standard or a guideline? The page placement and shape of the table is misleading. The previous staffing levels for custodial and maintenance employees in this manual were based on square footage. This seems to be staffing levels on the number of students without consideration of the type of building or buildings on a campus. If this is a standard, most of the districts in the state will be out of compliance. Staffing levels should be left to the discretion of local school districts unless sufficient funding is provided within the Foundation Funding Matrix. Recent research by the Bureau of Legislative Research documents that spending on these categories currently far exceeds the Matrix funding. This is an adequacy issue as defined by the Arkansas Supreme Court.</p>	No change	4000	Comment considered. Custodian Manual is guideline. No change.
11/10/14	Dr. Benny Gooden	<p>7000; Chapter 7, Page 1 - 2. All drawings including surveys and civil plans shall be prepared in AutoCAD.DWG format. Dictating to an engineer what type of software to use seems to be outside the authority of the division. A requirement for the use of specific software is not consistent with the professional standards which consultants in various fields may use. Many firms have transitioned to producing drawings in Revit, which is an AutoCAD product, due to the fact that they allow modeling the building, and coordination with consultants and contractors to eliminate conflicts between different disciplines. It is required to work in Revit when working on many higher education campuses in the state.</p>	Accept	7000	Insert ".pdf" before "format".

PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	<p>7050-Chapter 7, Page 2 - Sidewalks - Sidewalks shall be designed for accessible from the parking areas to all entry doors, as well as an accessible path from the street frontage, per ADA guidelines. Sidewalks shall be a minimum of 5' in width and shall be constructed of a minimum of 4" thick Portland cement concrete and minimum strength of 2500 psi. What is the definition of "all entry doors"? Some doors are installed to provide convenient access while not routinely used for entry or egress. The length of the sidewalk(s) required to all exterior doors from the parking lot and street will greatly increase the cost of a project. The definition of "street" in a rural area with a large plot of land must be addressed. Large school sites may not require sidewalks to the "street" as used in this context. "Driveway" may be a better designation.</p>	No change	7050	Comment considered. May be addressed through variance request. No change.
11/10/14	Dr. Benny Gooden	<p>7050-Chapter 7, Page 2 - 4. Trash Enclosure- Trash enclosure shall be provided in a location accessible to trash trucks without conflicting with pedestrian routes or bus pick-up/drop-off point. The size of the enclosure may vary by size and number of dumpsters available from the provider. Where practical, recycling may also be staged in the trash enclosure area. The standard enclosure shall have three sides constructed of durable wood, synthetic, or masonry to a minimum height of 6' and capable of screening the dumpster(s) from view. The enclosure will require a pair of gates on the "open" side to screen the dumpster interior and provide access. The enclosure shall be positioned so that the "open" side faces a drive entrance with a minimum of 35' direct approach to the enclosure. The trash enclosure shall be constructed on an 8" concrete slab and slab shall extend at least 15' in front of dumpster for the entire opening. This requirement makes no sense for school districts with large centralized trash collection dumpsters.</p>	Accept	7050	Change "require a pair of gates" to "be gated"
11/10/14	Dr. Benny Gooden	<p>7050 Chapter 7, Page 2 Curbing -Curbing shall be provided around the entire pavement perimeter and at all pavement edges. All curbing shall be defined on the site work drawings as to type of curb, size and general location. All permanent curbing shall be concrete. Extruded concrete curbing epoxied to the pavement surface is not permitted. Asphalt curbing shall only be allowed along pavement edges when it is adjacent to a future development area. This standard should be a guideline and curbing should be left to the discretion of the design professional in consultation with the local school district.</p>	No change	7050	Comment considered. Required standard for storm water flow. Possible variance. No change.
11/10/14	Dr. Benny Gooden	<p>Specific items which our architectural consultants have identified and which appear to be ill-advised include: Section 7050 Civil Site Work - General Standards #3: We do not Agree with site design being required to be done by a civil engineer. If it is a small project, there is no need for this additional cost to the owner when a licensed architect can perform.</p>	No change	7050	Comment considered. See ACA 22-9-101. No change.

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	General Standards #5: We do not Agree with the requirement of needing geotechnical analysis being performed by a geotechnical engineer. The size of the project may be small enough to not require. This should be the call of the architect or structural engineer. Additions to existing buildings for which prior soil investigations have been made make this unnecessary.	No change	7050	Comment considered. See ACA 22-9-101. No change.
11/10/14	Dr. Benny Gooden	Site Design Standards Paragraph #2: Parking should be controlled by the City of Fort Smith not DPSAFT. City standards are frequently more restrictive.	No change	7050	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Site Design Standards Paragraph #3: Sidewalk width should be at the discretion of the district. Requiring a minimum of 5'-0" wide is arbitrary.	No change	7050	Comment considered. May be addressed by variance request. No change.
11/10/14	Dr. Benny Gooden	Site Design Standards Paragraph #5: Requiring curbing on all paving edges is not needed. Some designs could be best served by no curbs for better site drainage. The cost of the curb could be a waste of School and State money.	No change	7050	Comment considered. May be addressed by variance request. No change.
11/10/14	Dr. Benny Gooden	Pavement Design Standards Paragraph #2: Pavement should not be required to meet geotechnical engineer's recommendations. These reports are recommendations only. Final say should be left to the architect or project engineer stamping the project.	No change	7050	Comment considered. Geotechnical Engineer licensed expert in this area. No change.
11/10/14	Dr. Benny Gooden	Pavement Design Standards (General): DPSAFT is trying to design paving.....not a good idea.	No change	7050	Comment considered. Minimum only presented. No change.
11/10/14	Dr. Benny Gooden	Subgrade and Building Pad Preparation Standards (General): Building pad and subgrade should be the responsibility of the architect and structural engineer; not geotechnical engineer	No change	7050	Comment considered. Geotechnical Engineer licensed expert in this area. No change.
11/10/14	Dr. Benny Gooden	Grading and Drainage Design Standards: Any slopes and drainage issues should be left to architects and engineers; not DPSAFT. They are trying to set minimums without knowing specific site conditions.	No change	7050	Comment considered. Variance may be requested. No change.
11/10/14	Dr. Benny Gooden	Water and Sewer Design Standards (General): Standards should stop at paragraph #1. "Domestic water and sewer shall conform to the requirements of the Arkansas Department of Health." Any other specific requirements muddy the water and may be in conflict with the Arkansas Department of Health.	No change	7050	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Section 7100 Foundation and Floor Slabs - Standards Paragraph #1: Requiring structural engineer to meet requirements of geotechnical engineer is in conflict with the person required to certify the overall plans. Geotechnical engineers should not require-they only recommend. Final responsibility is by structural engineer.	No change	7100	Comment considered. Geotechnical Engineer licensed expert in this area. No change.
11/10/14	Dr. Benny Gooden	Not all foundations need to be designed by a structural or civil engineer. The size of the project and use matters. It could be a ramp or a stair which wouldn't need structural engineering.	No change	7100	Comment considered. See ACA 22-9-101. No change.
11/10/14	Dr. Benny Gooden	Standards Paragraph #8: DPSAFT is playing designer with minimum concrete strength. Leave to architect and engineers. This holds true for paragraphs 9 -12.	No change	7100	Comment considered. Minimum standard. No change.

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	Section 7110 Framing Systems - Standards Paragraph #2: Not all structural framing requires a structural engineer. The size of the project matters.	No change	7110	Comment considered. See ACA 22-9-101. No change.
11/10/14	Dr. Benny Gooden	Standards (General): The building code covers this area. Section not needed.	No change	7110	Comment considered. Minimum standard. No change.
11/10/14	Dr. Benny Gooden	Section 7120 Walls Exterior Walls: EIFS: Does not require impact resistant mesh past a certain height. This requirement costs the owner and state money and is unnecessary.	No change	7120	Comment considered. Height not specified. No change.
11/10/14	Dr. Benny Gooden	Section 7120 Walls Exterior Walls: EIFS: Does not require impact resistant mesh past a certain height. This requirement costs the owner and state money and is unnecessary	No change	7120	Comment considered. No change. DUPLICATE
11/10/14	Dr. Benny Gooden	Masonry Veneer Cavity Units: Air cavity is a design decision and varies from project to project. Omit 1" minimum air cavity requirement.	No change	7120	Comment considered. Minimum industry standard. No change.
11/10/14	Dr. Benny Gooden	Masonry Veneer Cavity Units: Paragraph #4: Weep holes are governed by code. Omit from DPSAFT regulations.	No change	7120	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Masonry Veneer Cavity Units: Paragraph #9: "R" values are governed by energy code and take into account entire wall assembly. Omit from regulations.	No change	7120	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Masonry Veneer on Metal Framing: Weep holes governed by building code.	No change	7120	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Masonry Veneer on Metal Framing: "R" values and building insulation type are the call of the designer not DPSAFT.	No change	7120	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Precast Concrete Insulated Sandwich - Insulation type is dictated by the architect and panel company. Setting types of insulation allowed is not DPSAFT's call.	No change	7120	Comment considered. Minimum standard. No change.
11/10/14	Dr. Benny Gooden	Precast Concrete Insulated Sandwich - Requiring paint and skim coat on all concrete panels is not a construction standard but a design choice. What if the owner and architect want natural concrete?	Accept	7120	Delete Standard #8. Correct heading - change "Pre-Case" to "Pre-Cast"
11/10/14	Dr. Benny Gooden	Metal Panel on Metal Framing Standards Paragraph #8: "Insulation could be soybean oil based polyurethane open cell semi-rigid foam or equal." The word "could" implies recommendation. Move to recommend column. This holds true for all insulation in 7120 walls.	No change	7120	Comment considered. Minimum standard with options. No change.
11/10/14	Dr. Benny Gooden	Section 7130 Roofing Systems - In the section for Metal Roof with Blanket Insulation it requires a solid substrate. It is very unusual to see a solid substrate over blanket insulation. Later in the requirements for this system it requires thermal spacers. There would be no need for thermal spacers if the roof is installed over a solid substrate. The thermal spacers are to provide a break when the standing seam metal roof is attached to the steel purlins.	Accept	7130	Under Components, delete "solid substrate". Under Construction Standards #2, change "Thermal spacers" to "Provide break"

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	In the section for Shingle Roofing it calls for Ice and Water Shield to be installed on slopes less than 4:12. We Agree that this is the best way to handle low slopes with shingle roofs. However, there should be a caveat that the installation of ice and water shield will not void the warranty for the shingles, The literature from a lot of manufacturers states you must have two layers of roofing felt where slopes are below 4:12	No change	7130	Comment considered. Most shingle manufacturers accept ice and water shield. May request variance. No change.
11/10/14	Dr. Benny Gooden	Performance Standards: - "R" value Paragraph #2: Set by energy code. Don't need.	No change	7130	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	Why 20 year warranty?	No change	7130	Comment only by author. Reasonable minimum standard. No change.
11/10/14	Dr. Benny Gooden	Shingle Roof System: Paragraph #1 "Not fail when exposed to weather". Define weather. Why not use staples?	No change	7130	Comment considered. Better wind load resistance. No change.
11/10/14	Dr. Benny Gooden	Metal Roof with Blanket Insulation: Components galvanized steel purflins should not be required. Painted will be and should be acceptable.	Accept	7130	Under "Components, insert "factory primed or" before "Galvanized".
11/10/14	Dr. Benny Gooden	Snow Guards: Depends on location. Not all metal roofs should have snow guards.	No change	7130	Comment considered. Safety issue. No change.
11/10/14	Dr. Benny Gooden	Standing seam metal roofs are approved by manufacturer at 1:4: 12 slope. Requirement for 1:12 is over-kill.	No change	7130	Comment considered. Minimum not excessive. No change.
11/10/14	Dr. Benny Gooden	Metal Roof with Rigid Insulation: -"Not fail when exposed to weather." Define weather.	No change	7130	Comment considered. No change.
11/10/14	Dr. Benny Gooden	Energy Star doesn't mean anything. Remove from standards	No change	7130	Comment only by author. Reasonable minimum standard. No change.
11/10/14	Dr. Benny Gooden	Slope of 1:12 is over-kill.	No change	7130	Comment considered. Minimum not excessive. No change.
11/10/14	Dr. Benny Gooden	Built up Asphalt Roof System: Omit Energy Star - Covered in Energy Code.	No change	7130	Comment considered. More restrictive standard would apply. No change.
11/10/14	Dr. Benny Gooden	20 year warranty is an additional cost.	No change	7130	Comment considered. Minimum not excessive. No change.
11/10/14	Dr. Benny Gooden	Single Ply Roof System: Slope is dependent on roof size. Minimum slope is excessive.	No change	7130	Comment considered. Minimum slope not excessive. No change.
11/10/14	Dr. Benny Gooden	Section 7140 Openings Standards Doors and Windows: Interior doors to have factory finish should be removed. Field finished is acceptable and in some cases preferred. This should be at the discretion of the architect and owner.	No change	7140	Comment considered. Factory finishes more consistent. May request variance. No change.
11/10/14	Dr. Benny Gooden	Section 7160 Interior Floor Finishes Why remove hardwood floors used in older buildings?	Accept	7160	Remove strike through on "Hardwood". Move Examples right side of page.
11/10/14	Dr. Benny Gooden	Section 7170 Walls and Ceiling Finishes Construction Standards: NRC of .65 is not based on any standard ceiling tiles. We specify NRC of .55 for Armstrong 1728 and 1729. What about band and music rooms? May want different NRC rating.	Accept	7170	Agree to change .65 to .55

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
11/10/14	Dr. Benny Gooden	Section 7500 - The section for Technology Systems requires a technology plan to be prepared by a Registered Communications Distribution Designer. It is unknown how many Registered Communication Distribution Designers are available in the state. Most engineers probably do not hold that designation. This could also be considered beyond Basic Services provided by most architects and need to be an additional service. At any rate, this will significantly increase costs to school districts.	Accept	7500	Page #1, under Standards - General #1, delete "as part of the overall building design process before construction begins". Move #1 last sentence to right hand of page as recommendation.
11/10/14	Dr. Benny Gooden	In summary, the Division of Public School Academic Facilities and Transportation has made extensive changes to the Rules governing any construction. The items noted and possibly others go beyond the scope of necessary or reasonable regulation by DPSAFT. The rules should be revised and resubmitted for review prior to final adoption.	No change		Comment only by author. No change.
04/13/15	Jimmy Alessi	Section 7400, Page 3, Standards-Lighting #1 - Clean up language to allow lighting other than fluorescent. Delete "fluorescent" and delete "utilizing low harmonic electronic ballasts and low-mercury certified lamps."	Accept	7400	Cleanup language to allow lighting other than fluorescent. Delete "fluorescent" and delete "utilizing low harmonic electronic ballasts and low-mercury certified lamps."

**SECOND PUBLIC COMMENT PERIOD**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
05/13/15	Melinda Moss, Harrison SD	Concerned with suitability analysis in the Program of Requirements (POR). Clarify how single use spaces built larger than standard, both before and after 2008, will be used against public schools in future. Also concerned charter schools do not have to submit master plans, utilize School Dude, or meet any standards and accountability measures with which regular public schools must comply, nor will they need follow Facility Construction Manual. As a taxpayer, believes some accountability for "\$5 to 15 million dollars should be in place."	No change	Rule 3.34.1	Comment Considered. There is no provision in law providing that charter schools to meet similar requirements as traditional public schools (e.g., submit master plans, use School Dude, etc.). Regarding single-use spaces built before and after 2008, see Partnership Program Rule 3.34.1, addressing suitability: "However, the state recognizes that four particular space areas existing in school districts on or before 2008 may skew the comparison of existing space to that of the required POR space. Therefore, the Division will not count as existing space that total gross footage area above the required POR standard for the following four areas that existed on or before 2008: Physical Education, Media Center, Student Dining and Performing Arts."
5/26/15 (Public Comment Hearing)	Julie Mayberry, State Representative	Although there is space for health center restroom in POR, there's no indication it's only for students using health center, nor that it's adjoining health center. This could lead to privacy and contamination issues	Accept	6103, 6203, 6303	Comment Considered. The pages in the Facilities Manual addressing the Health Clinic and Health Center Restroom all have been changed to reflect "[r]estroom must be located adjacent to health clinic with entrance from the health clinic."
Same	Mayberry	Concerned health center restroom it is 45 square feet, but a family restroom elsewhere is 50 square feet; concern is whether there is enough space for wheelchair to maneuver.	No change	6103, 6203, 6303	Comment Considered. The 45 square foot space for the health center restroom is ADA compliant, and provides sufficient room for an individual in a wheelchair along with another person in the case assistance is needed. School districts may choose to make the restroom larger (at a greater cost); 45 square feet is the minimum required.

**PUBLIC COMMENTS/DIVISION OF PUBLIC SCHOOL ACADEMIC FACILITIES AND TRANSPORTATION RESPONSES**

DATE	RESPONDENT	COMMENT	STATUS	SECTION	DIVISION RESPONSE
Same	Mayberry	Regarding design of health center, shows potential space for cots but with curtain separating them. Encourages additional privacy for students by placing cot behind a door that can shut. There is a room where private conversations can be held but not where procedures can be conducted.	No change	6103, 6203, 6303	Comment Considered. Placement of a curtain is only a recommendation; a school district may place a wall if it so chooses.
Same	Mayberry	The 250 square foot health center space is not large enough; needs to be larger with more privacy. Doesn't take into consideration number of students on campus (more student population would need more health center space for students).	No change	6103, 6203, 6363	Comment Considered. The 250 square foot space for the health center is the minimum required. If a school district has a larger student population it could increase the size of the health center (at a greater cost).
Same	Mayberry	Health center needs sinks and sharps containers.	Accept	6103, 6203, 6303	Comment considered. Sink already included in health center; sharps container added.
Same	Mayberry	Regarding parking spots, manual outlines number of spots needed, but does not include number of handicap spots and van accessible spots required by ADA. Although manual reads that ADA guidelines must be followed (in another section of the manual), it would be handier to have the language with the chart where the parking spot numbers are.	Accept	Chapter 4	Comment considered. Minimum number of accessible parking spaces (including van accessible) added to Chapter 4 parking spaces that are consistent with ADA guidelines.
5/26/15 (Public Comment Hearing)	Paula Smith, RN, Representative of School Nurse Association	Having running water in school nurses' office would be like manna from heaven, and a flushing toilet would be increasing important, considering amount of procedures done in a school nurses' office. Many students have special health care needs that are receiving peritoneal dialysis, medications, tube feedings, bowel and bladder training programs.	No change	6103, 6203, 6363	Comment considered. The health clinics include a sink; the adjoining health center restroom contains a toilet.