Public Comment

Chapter 24:44 School Finance Accountability Board Administrative Rules

Exhibit 1

Date Submitted: 02/14/2017

Terry Gerber

I see that one of the factors that can be considered when applying for a waiver includes: (2) Fiscal impact due to declining student enrollment; If a district currently exceeds their "Target Instruction Staff Number", but their enrollment is not declining, I would hope that a district would not be penalized for reducing staff and not investing the saving back into staff salaries. Obviously, the reason a district would initiate a Reduction in Force (RIF) is to reduce their expenses to align with their funding level.

Exhibit 2

Date Submitted: 03/13/2017

Julie Kraft

24:44:03:03 -- I am assuming this would fall under (4) or (5): a teacher that takes extended leave without pay for a vacation or illness could essentially lower the actual average teacher salary paid and this could be something that comes up unforeseen during the year. This would be an allowable circumstance for a waiver, correct? Also, on (1) we have two long time teachers in the district retiring this year and have hired two younger teachers that are at a lower pay than the retirees naturally. We have to be able to do this in order to survive potential declining enrollments and other increases in costs, such as heating fuel, gas, insurance, etc. Also with those type of retirements come decisions concerning attrition or changing of duties to accommodate changes in enrollments/student/classroom needs, etc. Again, this would be an allowable circumstance for a waiver, correct?