

COMPLIANCE COMMITTEE MINUTES

Tuesday, March 11, 2025

2:00 – 3:00 PM ET

PRESENT	Steven Bullard	Kentucky Commissioner	Chair
	Daniel Dunham	Virginia Commissioner Designee	
	Laura Kacer	Iowa Commissioner	
	Michael Price	Michigan Commissioner	
	Douglas Ragland	Alabama Commissioner	
	Ray Shaw	Montana Commissioner	
	Shelley Joan Weiss	Wisconsin Commissioner	
EXCUSED	Brooke Huntington	Indiana Commissioner	
	Will Jones	Oklahoma Commissioner	
	John "Don" Kaminar	Arkansas Commissioner	
	Cherise Imai	Executive Director	
STAFF	Lindsey Dablow	Training & Operations Associate	
	Allie Thomas	Operations Coordinator	
GUEST	Cierra Manuel	Blue Star Families	Ex-officio

ITEM 1 – CALL TO ORDER

1. The meeting was called to order at 2:01 PM ET by Compliance Chair Steven Bullard (KY).

ITEM 2 – ROLL CALL

2. Training and Operations Associate Lindsey Dablow conducted roll call. A quorum was established. Ms. Cierra Manuel attended the meeting on behalf of Ex-officio Representative Tom Porter of Blue Star Families (BSF).

ITEM 3 – APPROVAL OF THE AGENDA

3. **Commissioner Shelley Joan Weiss (WI) motioned to approve the agenda. Commissioner Michael Price (MI) seconded the motion. Motion carried.**

ITEM 4 – APPROVAL OF THE MINUTES

4. **Commissioner Weiss motioned to approve the minutes from January 14, 2025, as presented. Commissioner Designee Daniel Dunham (VA) seconded the motion. Motion carried.**

ITEM 5 – REPORTS

5. **Executive Committee (EXCOM)** – Chair Bullard reported the EXCOM met on February 20, 2025. The Chair informed members the *Policy Guide* was updated to reflect changes made at the 2024 Annual Business Meeting (ABM) and reposted to mic3.net. Executive Director (ED) Imai and Vice Chair Daron Korte (MN) were attending the National Association of Federally Impacted Schools (NAFIS) Spring Conference, he stated a detailed report would be provided at the next committee meeting. As part of the report, Chair Bullard noted in partnership with the Council of State Governments (CSG), the national office was using the program Quorum to track the Compact statute citation correction and

other state legislation related to the Compact. Chair Bullard announced the state of California requested guidance on a local education agency's ability to waiver graduation requirements, seat time requirements and continuation of courses when there is a misalignment of the instructional period between the sending and receiving school. The EXCOM approved an award for Dr. Rebecca Porter, the former Chief Executive Officer and President of the Military Child Education Coalition (MCEC), upon her retirement.

6. Commissioner Weiss asked if any federal-level updates or changes made by the new administration impacted the Compact. She stated that she received multiple communications from parents in Wisconsin who inquired about updates to the Compact Rules regarding residency, advanced enrollment, and school choice. She stated she was not sure if these were actual issues or misunderstandings. Commissioner Weiss informed the committee that her understanding was military families were being encouraged to use vouchers, and she asked if the changes to the Rules were true. Chair Bullard responded that no changes were made to the Compact Rules or statute language. He stated that it was too early to tell if any federal-level changes would impact the Compact but assured the members that guidance would be provided if the Compact was impacted by any federal changes.

7. **2023-2025 Strategic Plan** – Chair Bullard reviewed the third-year tasks assigned to the Committee in the Strategic Plan and stated the Committee was on track to complete all tasks for 2025.

ITEM 6 – OLD BUSINESS

8. **FY24 State Compliance** – Chair Bullard reviewed the fiscal year (FY) 2024 State Compliance and Coordination infographic with the committee to address outstanding items from the previous fiscal year. He informed the committee that the General Counsel sent a letter to Vermont's appointing authority regarding the state's outstanding compliance items. No response had been received at the time of the meeting.

9. Chair Bullard reported that Alaska and Indiana appointed new Commissioners in FY2024, which under Compact Rules SEC. 8.101 provided the state one year from the appointment date to hold a state council meeting. The Alaska Commissioner informed the national office that the state held a meeting on March 7, 2025, to count for the FY2024 requirement. Commissioner Donald Enoch (AK) stated he would hold a second meeting before June 30, 2025, to count for FY2025.

10. Chair Bullard announced the Indiana Commissioner responded to inquiries from the national office but had not held a state council meeting for FY2024. It had been one year since the commissioner was appointed, and the deadline for the state to facilitate a state council meeting had passed. Chair Bullard called to elevate the state to compliance level three under *Compact Rules 7.105*.

11. **Commissioner Price motioned to elevate Indiana to level three per Compact Rules 7.105, allowing Chair Bullard to interact directly with the commissioner and assist in bringing the state back into compliance. Commissioner Weiss seconded the motion. The motion carried.**

12. **FY25 State Compliance** – Chair Bullard presented the FY25 State Compliance and Coordination infographic. The deadline for Commission members to submit their Code of Conduct (COC) and Conflict of Interest (COI) forms was January 31, 2025. Chair Bullard was happy to report that all COC and COI forms were signed by the state and ex-officio members for FY2025. The Chair noted the next submission deadline was June 30, 2025, and at that time states would have had to have held a state council meeting, paid the FY25 state dues, submitted the state's End-of-Year Report, and filled any existing Compact Commissioner vacancies.

13. Commissioner Weiss asked if the colors on the infographic could be modified to allow for more distinction between the sections on the wheel. She also suggested the creation of a checklist featuring the reporting requirements and the June 30th due date. Chair Bullard and the members agreed that some of the colors within the infographic were difficult to differentiate between and agreed to modify the infographic for review at the next meeting.

Commissioner Douglas Ragland (AL) expressed concern that Alabama had received a second dues notice reminder after he had confirmed with the national office that his state payment for FY25 was in process. Chair Bullard assured him that it was a standard Commission practice to issue second notice emails automatically until payment is received.

14. **Member State Responsibilities and Compliance** – Chair Bullard reminded members that the committee reviewed the Compliance Cost Analysis document, which outlines the expense incurred by the Commission to pursue states when they are not in compliance with the Compact and Rules. The Chair noted the Interstate Compact for Adult Offender Supervision (ICAOS) *Dues Assessment and Enforcement 05-2024* policy was provided during the January meeting as an example for the committee to review. Chair Bullard stated he had spoken to Commission Treasurer Greg Lynch (WA) regarding the proposal draft policy *1-2025 Compliance Fee Assessment*, and noted the document was a draft that would be reviewed by the Compliance, Finance, and Executive Committees as part of the 2023-2025 Strategic Plan's third-year tasks.

15. Chair Bullard reviewed the draft policy, which outlined a late fee structure based on an initial penalty based on the state's dues amount multiplied by one percent (1%) which would compound monthly until the state is brought back into compliance or for twelve months whichever event occurs first.

16. Commissioner Weiss stated that she supported the penalty for states that failed to submit the annual dues payment on time, but she did not agree with the idea of making states pay for late documentation. She understood the data demonstrated that the Commission's greatest expense was related to filling the Commissioner vacancies and the reporting requirements, and the annual dues were a lesser expense but did not think it translated to a specific dollar amount. She expressed concern that there was too much turmoil among the states to understand where funding was coming from, and she feared that it was not an appropriate time to introduce new fee assessments for documentation requirements. She recommended that the Commission be sensitive to the timing when proposing new fees.

17. Commissioner Designee Dunham agreed and stated he was concerned about Tier 1 states being fined more than others because of their higher dues assessments, even though staff would spend the same amount of time on noncompliance work regardless of whether it was a Tier 1 or Tier 4 state. He suggested applying a flat fee to the required membership items that applied to all states equally. Commissioner Designee Dunham noted a flat fee would hold the chronically delinquent states accountable. Chair Bullard agreed to recommend a set fee and suggested a higher amount for dues and a lower amount for document submissions. Commissioner Price stated that a flat fee would be easier to justify and would be fair to all states since compliance costs were based on time.

18. Chair Bullard stated he was also in favor of assessing a higher flat rate for late dues payments and a reduced fee for document submissions. Commissioner Designee Dunham recommended applying a flat fee for all areas of Commission duties, stating that it was detrimental to the Commission if none of those areas were addressed. He emphasized the importance of holding non-compliant states accountable for documentation items because those items were important. The members agreed.

19. Commissioner Weiss expressed concern that the Commissioners would withdraw their states from the Commission. Chair Bullard acknowledged the need to enact any policy that proposes a penalty on the member states in a manner that acknowledges the current climate in education and the federal government. However, he reminded the committee that only a state's legislature could withdraw its state from the Compact by repealing the Compact statute in their state and that was unlikely since the law assists children and access to education.

20. Commissioner Ragland asked how many states were untimely in submitting their membership requirements. Ms. Dablow responded that five states were consistently late each year. Commissioner Designee Dunham stated that the Committee's recommendation would need to stress the small number of non-compliant states when bringing the policy recommendation forward to the Finance Committee. He also noted the current shift in the federal government to return education to the states increased the importance of the Compact because it is instrumental for military kids and provides flexibility to state and local education agencies and how those students are treated.

21. **Commissioner Weiss motioned to forward the *Compliance Fee Assessment Policy* draft to the Finance Committee and directed Chair Bullard to recommend a flat fee for late documentation submissions; whereby, the fee for delinquent annual dues would be greater than the fee established for the remaining requirements. Commissioner Ragland seconded the motion. The motion carried.**

ITEM 7 – NEW BUSINESS

22. **Good, Better, Best Practices Guidance Document** – The members agreed to table the review of the *Good, Better, Best Practices* document until the next Committee meeting.

ITEM 8 – OTHER BUSINESS AND ANNOUNCEMENTS

23. **Items for the Executive Committee (EXCOM)** – Commissioner Ragland asked Chair Bullard to request the EXCOM consider recognizing states that fulfill the annual requirements outlined in Compact Rules, *SEC. 8.101 Coordination Between States and Commission*. Chair Bullard stated he would introduce the suggestion to the EXCOM.

24. Commissioner Designee Dunham stated the Commission needed to think about how to move forward and exist in the current climate and asked for the EXCOM's consideration on future issues. Chair Bullard agreed and stated he would discuss the concerns with the EXCOM.

25. **Compact 101 Training** – Chair Bullard reviewed the 2025 Compact 101 Training schedule graphic and encouraged members to promote the sessions to their State Council and stakeholders.

26. **Month of the Military Child (MOTMC) Toolkit** – The members were encouraged to promote the Toolkit and spread awareness in preparation for April. Commissioner Weiss asked if the toolkit included hashtags for social media posts. Ms. Dablow confirmed that hashtags were included in the toolkit.

ITEM 9 – ADJOURNMENT

27. With no further business, Chair Bullard adjourned the meeting at 3:04 PM ET. The next meeting will be held on May 13, 2025.