



Chapter 55

Public Comment

Received June 10th through June 15th



Written Public Comment
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Dear Mr. Loveridge,

I understand you have a role in the decision of school counseling. If mental health is the problem of school shootings, why on earth would we not have MORE counselors per student than less?

I see firsthand how thin our counselors are stretched with 4 children in Billings schools. How are we supposed to believe you about mental health being a problem that needs fixing when you are planning to cut the amount of counselors who can catch this problem and be part of the solution.

I receive phone calls frequently that the school is on lockdown due to another threat. My children tell me that bullying is rampant. The children need more counselors and I insist that you put your money where your mouth is on mental health to prevent school shootings.

Sincerely,
Deborah Horning
Billings

To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Additionally, I do not think that every school district in the state should have to suffer because smaller districts are having a hard time finding accredited librarians, counselors, and teachers of elective courses. Also, why should one woman be able to enter a position of power and be able to alter the livelihoods of hundreds of educators across the state and be able to change standards that have been in place for 30 years? Seems like a blatant power grab for whatever agenda this superintendent of schools has in mind.

Yours sincerely,
Kraig Rieger
Montana, 59741, United States

1

Wondering what has happened with Superintendent Elise Arntzen's proposal to get rid of requirement to get rid of state requirement for middle schools to have counselors and librarians in all schools, and course electives, including visual and performing arts for middle schools? As a 4th generation Montanan with children

and grandchildren in Montana, and someone who was educated in Montana public school, and experienced the impact of music and art in my education and in my life, I strongly oppose these moves! And anyone who has any scientific, psychological, human experience with children knows that middle school age children need counselors most of all! Please don't let this happen!

Sincerely, Sheila Noble Giesler

2

I'm a school librarian to approximately 250 5th through 8th grade students.

Please do not allow Superintendent Arntzen to railroad this change to ratios in our schools that have worked well for years. Why is she wanting to make this change now? What is so pressing that these changes need a quick overhaul without the much discussion and research? Why is she do intent upon NOT listening to her own advisory board? What is her motive? She says she wants to give school boards local control yet, they already have that control with guidance. Did boards not have local control last year or the years before? Why upend that guidance now? Why is she not providing reasons why the way things are now aren't working? So much of this seems off.

Please stop this madness and asked Superintendent Arntzen to listen to her advisory committee.

Bev Richardson
Junior high librarian
Manhattan, MT

3

To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,
Rick Hackford
Montana, 59801, United States

4

Dear comity's chair and members,

I am writing to ask you to increase school counselors not decrease school counselors like Miss Elise Arnzen is trying to do. Both of my kids currently in the bozeman School district suffered from depression and anxiety from the pandemic. One of my children is still dealing with lots of anxiety. The current counselors at the school are already overworked. They have been a huge asset both in middle school and high school to my children. Many kids do not have resources at home and depend on their school counselors and teachers. I am begging you to make a common sense decision here based on our increased rate of suicides and kids struggling with mental health issues and The increase in school shootings.

This is not the time to decrease help for our kids !

Thank you for your time,
Bozeman, MT 59715

To the Negotiated Rules Making Committee:

I am writing today to voice my concerns and opposition to the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. I am a middle school librarian in Billings, Montana. I am the librarian to 616 students. I maintain a library collection of over 9,000 books. Throughout the 21-22 school year, students checked out 13,988 books. I collaborated with 6th, 7th and 8th grade English and Social Studies teachers to teach research skills, internet safety skills, and Indian Education for All lessons to name just a few. My library is the hub of the schools. It is the safe place for many students to come throughout the day.

Our job as school librarians helps to maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Thank you for your attention and time to this important issue.

Sincerely,
Julie Whitworth

5

Dear Ms. Loveridge,

I would like to add my voice to those who are opposed to the latest proposals by Superintendent Elsie Arntzen. Her proposal to change the minimum standards in counseling, library and fine arts are beyond unacceptable. I am a former teacher, a former school board member and a former school volunteer. And I know that standards are driven by data. I have not heard of any data that supports Ms. Arntzen's plan.

As a matter of fact, the Bozeman Chronicle stated the state superintendent of schools feels those decisions should be made by the local school boards because they have a better feel for the community. I think that is a ludicrous way to run any organization, especially a public school that is funded by state and local tax dollars. I never saw our local school board decide to trim reading, math, science, music or counseling because the community didn't have a good feeling. School boards, administrators and teachers make those decisions on data and standards.

I also am shocked that the state superintendent of schools is willing to reduce mental health programs at a time when many of our young people are struggling with mental health issues. She shows poor leadership and judgement in "faithfully working in all practical and possible ways for the welfare of the public schools in the state." (Montana Code)

Sincerely,
Kay Bogen
Bozeman

6

To the Negotiated Rules Making Committee:

I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

I know that some OPI members of the NRMC have argued that no research exists to support ratios for counselors and librarians. There is a strong body of research that supports that having endorsed school

librarians increases literacy rates. Please see [https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!uNKrPHF46Dtfoin97MNeLWz8wT2yRzXzGfIYC8e5yIZeEJOBUcN6qiUQ6ZuAiW2piRylkTBvYFXEIMW2aFeigJ3XQ5e3\\$](https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!uNKrPHF46Dtfoin97MNeLWz8wT2yRzXzGfIYC8e5yIZeEJOBUcN6qiUQ6ZuAiW2piRylkTBvYFXEIMW2aFeigJ3XQ5e3$) for some of the best.

Montana has supported this system for over thirty years through both Democratic and Republican administrations. The Superintendent says she supports quality, yet, she recommends only a single librarian for a school system. If she believed in quality, we need to require a school librarian in every school. We are living in a time when the need for counselors and librarians is at all-time high. Our librarians and counselors provide a safety net for our students.

Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Kristi Laib
Montana, 59101, United States

7

To the Negotiated Rules Making Committee:

I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

Sadly some OPI members of the NRMCM have argued that no research exists to support ratios for counselors and librarians. I would respectfully disagree as THERE IS a strong body of research that supports the role of endorsed school librarians in increasing literacy rates. Please see [https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!qECoQoNV9Vg7VOKBMmp6bYtyKyYw-icALX-tJouiYREddt2i799PyGbh7UvW3tpdFWYxVV43zxMU6rfAXb0uzIUuk1bb\\$](https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!qECoQoNV9Vg7VOKBMmp6bYtyKyYw-icALX-tJouiYREddt2i799PyGbh7UvW3tpdFWYxVV43zxMU6rfAXb0uzIUuk1bb$) for some of the best.

Montana has supported this system for over thirty years through both Democratic and Republican administrations. Our students perform well in academic and career-centric pursuits. The Superintendent says she supports quality, yet, she recommends only a single librarian for a school system. If she truly believes in quality, we need to require a school librarian in every school. We are living in a time when the need for counselors and librarians is at all-time high. Our librarians and counselors provide a safety net for our students as well as providing fundamental academic support.

Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Diane Anderson

8

To the Negotiated Rules Making Committee:

I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

I know that some OPI members of the NRMCM have argued that no research exists to support ratios for counselors and librarians. There is a strong body of research that supports that having endorsed school librarians increases literacy rates. Please see [https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!raHWh5KWijYiU03pQsrB4nTo2PdN665EifcYPmWaoWYgYAJBok8J511XKF_o9krJbCLSiZxkTLvfScpT0m33zYhHuyHG\\$](https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!raHWh5KWijYiU03pQsrB4nTo2PdN665EifcYPmWaoWYgYAJBok8J511XKF_o9krJbCLSiZxkTLvfScpT0m33zYhHuyHG$) for some of the best.

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Yours sincerely,
Cheri Bergeron

9

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Valeri McGarvey
Montana, 59901, United States

10

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Jacob Rosen
Montana, 59602, United States

11

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Amy Hunter
Montana, 59730, United States

12

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Lily Kirsanow
Montana, 59901, United States

13

I support Financial Literacy to be taught in Montana's high schools. Please consider adding this to the high school curriculum.

Sincerely,



Michael Spotorno | Agent

**Michael Spotorno State Farm
Insurance & Financial Services**

Good morning and Happy Flag Day!

I am writing in support of Financial Literacy being taught in Montana schools.

Dr Carly Urban (MSU) spoke at our conference in May and stressed the importance of this addition to school curriculum. Not making this a part of our youth's educational background is doing a terrible dis-service in my opinion and I strongly urge the support of all members of the Board of Public Education.

Kind regards,

Roger Gravgaard

Licensed Agent

Tristen,

I support financial literacy being added as a ½ unit requirement for high school graduates. I'm a Certified Financial Planner with 23 years of experience and see the enormous value of all graduates of Montana schools having a better understanding of cash management, borrowing, negotiating, risk management, investing, and goal setting. Thank you for your time.

Sincerely,
Dan

Peter Daniel Sullivan, CFP®
Senior Wealth Manager



Tristen-

Although I will be speaking in the July BPE meeting, I would like to voice my support of Guaranteeing Financial Literacy classes and a graduating criteria.

This is something that parents want, the business community wants, our society needs, and our children deserve.

Best Regards,



MIKE PAFFHAUSEN - AGENT

Hi Tristen,

I wanted to voice my support of a ½ unit high school graduate financial literacy requirement. To help young people understand budgeting, interest, loans, investments, and other financial subjects before they graduate makes a lot of sense for their lifetime of working with money.

Before I moved to Montana in 2016, my kids attended required financial literacy courses in Utah and they are much better and smarter with their money for having done so.
Thanks!

-Brian Nelson

Brian K. Nelson, CFP®
Senior Wealth Manager



I am writing to you to encourage the adoption of 1/2 credit of financial literacy for every Montana high school student. Thank you

Dan Rust

Board of Public Education Members-

I'm currently a business consultant and have been in insurance & financial profession in Montana for over 20 years. During that time I've seen families who have struggled with financial decision making and those who have prospered. Often, the difference was in who had access to or opportunities for additional financial education from varied sources. Those decisions can have generational impacts on wealth in our state and

research has proven education in this space can drastically reduce and in some cases eliminate the extent of the consequences while improving their ability to save for – and protect against the risks of – retirement. And, those benefits impact state and local resources to maintain a solid foundation in our communities.

I support the efforts of Superintendent Elsie Arntzen to guarantee financial literacy to our youth as a graduating criteria. There is no greater way to elevate our Montana citizen to a better financial place than through education, and there is no better way to educate than through our amazing Montana Educators.

As professionals, we stand ready to assist teachers and schools in implementing this curriculum in any capacity teachers request.

This is a decision that can change outcomes for generations for many Montanans.

Sincerely,
David Jensen

David Jensen, CLU®, ChFC®, RICP®
Sales Leader, Central Montana

Hello Tristen

Please support Financial Literacy in Montana High Schools. It has been demonstrated that this helps students who take these courses make better financial decisions not only right after high school but for years after. They use payday loans less and have improved credit scores.

Dr. Carly Urban of our own Montana State University has researched this extensively. Not only will our students be better citizens but it will be better for our society as a whole.

Thank you,

Edward Brown

Investment Advisor Representative

Missoula, MT 59803

To the Negotiated Rules Making Committee:

I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

I know that some OPI members of the NRMC have argued that no research exists to support ratios for counselors and librarians. There is a strong body of research that supports that having endorsed school librarians increases literacy rates. Please see [https://urldefense.com/v3/_https://bit.ly/mt-ratio-research_!!GaaboA!s66NT-bi9Od8r4-wTVxpuJEocZcsmKpOz39BhaY3z2YNggpr1w9_6091JPR42BAGWsg8ffLnR-prRVMtFtLLRcD7xh97\\$](https://urldefense.com/v3/_https://bit.ly/mt-ratio-research_!!GaaboA!s66NT-bi9Od8r4-wTVxpuJEocZcsmKpOz39BhaY3z2YNggpr1w9_6091JPR42BAGWsg8ffLnR-prRVMtFtLLRcD7xh97$) for some of the best.

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Christine Kombol
Montana, 59102, United States
June 14, 2022

14

Esteemed members of the the chapter 55 Rule Making Committee,

While reviewing Superintendent Elsie Arntzen's recommendations redacting meaningful language to the current State Accreditation Standards for Montana's schools, please consider the following questions: What are the stated and implied motives for altering sound guiding - language present in current accreditation standards? As a result, what is lost and what is gained by families, citizens, children, educational professionals and the communities that they serve? What evidence, if any, is given for the redaction of present accreditation standards. Do proponents of these vast changes pose evidence for change based on historical data or do they rely on speculative ideals lacking best practices for pedagogy.

As a father of a child attending a Montana rural school, an educational professional continuing my fifteenth year of teaching in both rural and populated schools, a public servant with a Montana k-12 license in Visual Art and a secondary license to teach history, a dedicated Masters of Education in Curriculum and Instruction, I am hopeful that some gravity may accompany my words. I am alarmed into action by the potential elimination of meaningful and actionable accreditation requirements and what that implies for content, best practices, theories of knowledge and the very heart of public education in the state of Montana. Observing the scope and breadth of Superintendent Arntzen's recommendations, I am at pains to address her fulsome and vast disassembly of our current functional, articulate and wholesome accreditation standards. The Superintendent's recommendations for regressive changes point to solutions in search of problems. Regarding changes to: 10.55.902 alone the sheer quantity of nullified language, educational cuts and voluminous eliminations, we are forced to ask the question what is valued and what is not valued, or understood, by actors who would seek to dismantle, rearrange and undermine the overwhelming effectiveness of our current standards for schools.

If it were a few revisions and not a wholesale assault on the very soul of current standards, and by extension, what works well in education, then thoughtful deliberation, would not warrant a reply, rebuttal or comment from the public. Unfortunately, this is not the case at present. In the face of our Superintendent's sweeping dissolution, and in her recommendations to the chapter 55 committee and the Montana Board of Public Education, we are compelled to realize a stark analysis, an analysis implicit in her consequential vision. The impacts of our Superintendent's proposed limits are legion; and to perform an effective cost-benefit analysis on each recommendation requires more time than is afforded. This massive revision births a troubling conclusion. The alteration and effective destruction of our current requirements and guidelines does not benefit our children, communities or the state as a whole. People who would dismantle positive school requirements open a dangerous void to be filled by ill-informed policy. We would have to be complete fools to accept this abyss of revision replaced by solutions to a problem that doesn't exist.

Forcefully,
Dustin Hoon
Big Sky High School Visual Arts
Big Sky High School

15

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Montana has supported this system for over thirty years through both Democratic and Republican administrations. The Superintendent says she supports quality, yet, she recommends only a single librarian for a school system. If she believed in quality, we need to require a school librarian in every school. We are living in a time when the need for counselors and librarians is at all-time high. Our librarians and counselors provide a safety net for our students.

Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Mary Drew Powers
Montana, 59937, United States

16

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I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

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Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Mary Drew Powers
Montana, 59937, United States

Hello! I am a trustee on the board of the Montana National Association of Insurance and Financial Advisors (NAIFA). I am emailing to let you know how much we are appreciating your efforts regarding Financial Literacy in our Montana schools. We believe in this! I have communicated our efforts to many of my colleagues, my friends that are teachers and to my friends that are parents. They all felt that we have been neglecting this aspect for our children and they whole heartedly agreed that we need this!

Take care and thank you for your attention! 😊



Jenette' Hollingworth-Delcomte
Life/Health Products Representative

My request is that this be read into the comment section of the meeting that will take place on June 16th at the Negotiated Rule Making Committee Meeting

Ladies and Gentlemen:

Student mental health services are needed more than ever, Montana's suicide rate is more than double the national rate, and school shootings are on the rise, we need more school counselors, not fewer. The individuals who spent a great deal of time and effort working on the Chapter 55 Task Force recommended more contact with counsellors for students, they are in the field of education and understand current needs of students and school districts. Superintendent Arntzen and her recommendations are oblivious and out of touch.

To throw out the Task Force's recommendations and substitute her own drastically altered suggestions does not demonstrate anything similar to the locally controlled schools she promotes – it reduces their options and handcuffs progress. Supt. Arntzen is actually, "Gutting the quality public education system that has served Montana" as constitutionally promised and provided. The School System's not broken, so it doesn't need any of these poorly thought out changes! Reducing requirements only hurts students who wish to make a better life for themselves. Montanans are very proud of our educational system, and it works as is – even better if the Task Force suggestions are allowed to improve it!

Two voting members from OPI serving on this Negotiated Rulemaking Committee, (who get paid by working for Elsie Arntzen), will ensure that consensus is not reached thus forcing her recommendations to the Board of Public Education, which is highly unethical.

I beg each of you on this committee to fight for Montana's quality public education system, reject the changes that are presented by Elsie Arntzen. The collective work of the Chapter 55 Task Force should be honored as well as the trust of the public, educators, administrators, staff, and students across Montana.

If we can't get it right under this administration, we should do nothing at all!

Cathy F. Maloney
Butte- Silver Bow County Supt. of Schools
To the Negotiated Rules Making Committee:

General Comment against changes- strong argument

I am writing you personally to thank you for serving on the Negotiated Rule Making Committee for ARM 55 and for your support for our school counselors and school librarians.

I know that some OPI members of the NRMC have argued that no research exists to support ratios for counselors and librarians. There is a strong body of research that supports that having endorsed school librarians increases literacy rates. Please see [https://urldefense.com/v3/_https://bit.ly/mt-ratio-research_!!GaaboA!stQMDUUF7eC7B0q4E9wQjsiAsUvkKi42HB9OgNeZmyk2AYZF8T45Y96NeHewwFeUrTmufBO-7HXsQgr-jDKXBS53Jh0c\\$](https://urldefense.com/v3/_https://bit.ly/mt-ratio-research_!!GaaboA!stQMDUUF7eC7B0q4E9wQjsiAsUvkKi42HB9OgNeZmyk2AYZF8T45Y96NeHewwFeUrTmufBO-7HXsQgr-jDKXBS53Jh0c$) for some of the best.

Montana has supported this system for over thirty years through both Democratic and Republican administrations. The Superintendent says she supports quality, yet, she recommends only a single librarian for a school system. If she believed in quality, we need to require a school librarian in every school. We are living in a time when the need for counselors and librarians is at all-time high. Our librarians and counselors provide a safety net for our students.

Thank you for supporting our students. And please continue your hard work to stop these recommendations from gaining momentum.

Yours sincerely,
Angela Archuleta
Montana, 59901, United States
To the Negotiated Rules Making Committee:

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Yours sincerely,
Emily Richardson
Montana, 59718, United States
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18

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[research_!!GaaboA!tAH6r9tmVDtGazbWHYMnl73JoJ5gKzF7H9l4EwzToxq18X08lnE0Ch2ttVeeEaDMxcX43U8l4ixNq1caHeClbyfCp8W\\$](https://urldefense.com/v3/https://bit.ly/mt-ratio-research_!!GaaboA!tAH6r9tmVDtGazbWHYMnl73JoJ5gKzF7H9l4EwzToxq18X08lnE0Ch2ttVeeEaDMxcX43U8l4ixNq1caHeClbyfCp8W$) for some of the best.

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Yours sincerely,
Kipling Cox
Montana, 59715, United States

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Bev Richardson
Montana, 59718, United States

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