



Chapter 55

Public Comment

Received June 16th through June 23rd



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I read about the proposal that Arntzen recommended to the Task Force. The recommendation to let the local school decide about the number of counselors and not having a library or librarian is unbelievable to me considering the issues the kids in Montana are facing. There are a lot of kids that need a person to talk to and someone looking over the kids to try and identify ones that are struggling and need some help. If anything we should be increasing the quota and funding for more counsels in schools. If left to the local schools some may not have enough funding and would be forced to make cuts possibly eliminating the counselors out of necessity to keep the doors open.

Arntzen should reflect on Andrew Carnegie idea which was "So public libraries became instruments of change — not luxuries, but rather necessities, important institutions — as vital to the community as police and fire stations and public schools". This is also true for school libraries. Montana kids use the school libraries as a safe place to read, check out books, learn about new ideas through books and printed material. We all have spent time in a Library and have felt the calming effect it has and the reassuring feeling you get when you know you have a librarian to help you find the perfect book or research material for a school project.

The idea Montana has a Superintendent of Public Instructions recommending Montana remove the quota for counselors and giving the discission to the local schools on number of counselors along with removing the Librarian and Libraries from any school is appalling.

How did we get to this stage in Montana. I strongly believe this is not the Montana Public School direction or policy that is good for future generations so I also forwarded this to Governor Gianforte, Senator Daines and Senator Tester.

Please feel free to contact me if you want to discuss further.

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Dan Brennan

Dear Chapter 55 Negotiated Rulemaking Committee,

I am writing to urge you to not accept Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. As a nation, we have experienced change and trauma on a global scale in response to the pandemic. As students return to in-person classes we're seeing increased numbers of behavior issues, bullying, and mental health challenges such as anxiety, depression, and suicidality. Oh, and they're often behind in their academic learning.

In order to care for our student's academic achievement, we must value their emotional well-being by giving them greater access to mental health support, not less. Today, our accreditation standards require one counselor to 400 students, while the national recommendation is 250 students per counselor. We should be

working to lower this number, not abolish staffing ratios entirely.

After working as support staff in a middle school for three years I witnessed firsthand the invaluable support school counselors play in the lives of students. Most people don't know that in addition to meeting with students one-on-one, school counselors teach emotional and social lessons to classes on topics recommended by teachers to match what behavior problems arise for that age group at that point in time. They might teach about how to be more inclusive on the playground, the harms of gossip, and how to report cyber bullying. In this way and many others, school counselors support teachers, school administrators, and parents. Now, ask a school counselor who currently serves 400 students to continue serving those students, parents, teachers, and administration while also adding an additional 300 or more students to their caseload and we're bound to not only see students suffer but also higher burn-out rates among counselors. (Arizona, a state without staffing ratios, has 905 students per school counselor.

I implore you to listen deeply to how these revisions will impact the youth in Montana public schools. Please take time reading these opposition letters--even when they are difficult, emotional, and long.

If you must accept these revisions then please put in the work, time, money, and effort to provide as much mental health support as the current accreditation standards provide. If this is an impossible ask, then I return to wondering why these revisions would be adopted and who they aim to serve.

Thank you kindly for giving this letter your undivided attention,

Linds Sanders

Hi Tristen...I wanted to reach out to you and show my support for providing financial literacy to be taught in all of our MT. High Schools. Thank You for allowing me to comment and I hope that this can happen in our schools. Sincerely, Brian Salonen

Brian Salonen, CLU, LUTCF | Financial Advisor

WestPac Wealth Partners (**Formerly Northern Rockies Financial Group**) | Montana

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!oKc8yQwL-HZt08UvWk2cVAxl-kmCCq5ebaZg1vD5UictBYYT UKdRUMqiYOA qXGz2VlwBTb8y-gLOCBhDaBOcLDBJKi\$ 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,
Jeni Lannen

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I want you to know how much I appreciate the ongoing, laborious work the Negotiated Rule making Committee is doing regarding Standards of Accreditation. After watching the process on ZOOM I realize how fortunate the students of our state are to have your supportive efforts needed to provide for their successful education and for educators ability to provide services to those students.

Thank you!

Patricia Doyle (retired teacher)

To whom it may concern

I am extremely concerned about the proposed changes to graduation requirements and what it will do to public education in the state of Montana. I feel like these changes is a "dumbing down" of our educational system and do not believe it is the correct pursuit to go.

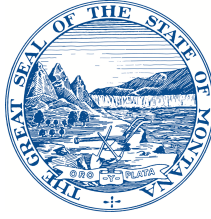
I am especially concerned about losing student access to CTE courses and what will constitute a CTE credit. We have skills gaps in the vocational areas across our state and our country. Losing CTE requirements in high schools seems contradictive to our own Governor's plans to create partnerships between schools and industry.

Please reject the changes to graduation requirements for the sake of our students and public education.

Thank you

Randy Radke

Montana State Senate



The Big Sky Country

June 22, 2022

Chapter 55 Negotiated Rulemaking Committee
Montana Office of Public Instruction
P.O. Box 202501
Helena, MT 59620-2501

To Whom it May Concern:

As members of the Montana State Senate, the duty to provide for a quality, equitable public education for every child is among our most important constitutional responsibilities. Unfortunately, we believe that certain revisions to school accreditation standards proposed by the Superintendent of Public Instruction fall far short of meeting that responsibility.

According to the Superintendent's own data--provided in the 2021 Youth Behavioral Risk Survey--a stunning 41% of Montana's high school students are experiencing depression and 22% of high school students have seriously considered suicide. Furthermore, data from the U.S. Centers of Disease Control ranks Montana's suicide rate as the 3rd highest in the nation. These findings constitute an incredible crisis which our communities and state government must urgently address.

Instead of meeting this crisis, the Superintendent's proposal threatens to make it worse. Among the changes presented is to eliminate the basic standard for schools to employ one full-time counselor for every 400 students. Such a change is simply unacceptable given the current situation. While all education professionals play an important role in supporting the mental health and wellbeing of students, school counselors bring unique expertise to the table as well as the ability to devote extra time and attention to providing mental health care to students and help those students and their parents find additional help when needed.

We understand that the Superintendent argues that this change, among others in the proposals, furthers the principle of local control of public education. While we agree that local control is an important characteristic of Montana's public education system, the State also has an obligation to ensure that every student is provided not only with a high-quality, free education, but with a school environment that furthers their health, well-being, and opportunity to learn. The Superintendent's proposal shirks that obligation.

Therefore, we urge in the strongest terms that the Superintendent's proposal be rejected and the current standard for school counseling programs be maintained, if not enhanced. We appreciate your attention to this vitally important matter and thank you for your work on behalf of Montana's students and families.

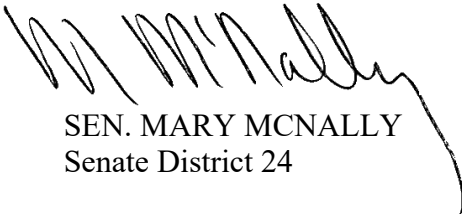
Sincerely,



SEN. JILL COHENOUR
Senate Minority Leader



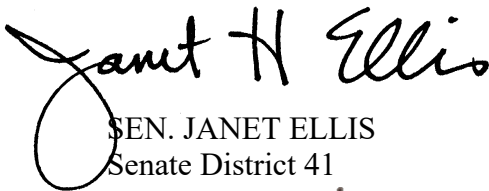
SEN. CARLIE BOLAND
Senate District 12



SEN. MARY MCNALLY
Senate District 24



SEN. EDIE MCCLAFFERTY
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Senate District 41



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Senate District 46



SEN. DIANE SANDS
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