



June 20, 2019

Dear Partners in Education,

On May 13th the Office of Public Instruction submitted an amendment to Montana's State Plan under the federal Every Student Succeeds Act (ESSA) to the U.S. Department of Education. The amendment provided a definition for "ineffective teacher" as required by ESSA.

The Department further requested supporting evidence to show that low-income and minority children enrolled in Title I, Part A schools are not served at a disproportionate rate by ineffective, out-of-field, or inexperienced teachers. Below is the report that the OPI ran for the Department which confirms that low-income and minority children in Montana are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers. The additional information requested by the DOE was submitted on June 10th. We hope to hear from the Department in the next several weeks whether Montana's amendment is officially approved.

June 10, 2019

Montana Amendment Clarification for Ineffective Teacher

Amended Definition Submitted to the DOE:

The U.S. Department of Education approved Montana's Consolidated State Plan in January 2018 under the federal Every Student Succeeds Act (ESSA) with the understanding that by May 15, 2019, Montana would submit an amendment to its State Plan to comply with ESEA section 1111(g)(1)(B) which requires definitions of ineffective, out-of-field, or inexperienced teachers to show that low-income and minority children enrolled in Title I, Part A schools are not served at disproportionate rates by these three categories of teachers. Montana's current State Plan has approved definitions for out-of-field and inexperienced teachers. **This amendment is to provide a definition for ineffective teacher.** Montana has defined these terms as:

- Ineffective: Montana teachers who are non-licensed or show a pattern of ineffective practices as determined by a local evaluation.
- Out-of-field: Montana licensed teachers teaching outside of their endorsed subject areas.
- Inexperienced: Montana teachers with less than one year of teaching experience.

Description

The percent of ineffective, out-of-field, or inexperienced teachers for the 2018-2019 school year was gathered and evaluated to determine if low-income and minority students enrolled in schools receiving funds under Title I, Part A are served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers defined in ESEA Section 1111(g)(1)(B). The OPI used annual non-fiscal data collected through the Montana State Educator Information System ([MSEIS](#)) to report the percent of ineffective, out-of-field (mis-assigned), or inexperienced teachers. The ineffective teacher data is reflected in the non-licensed teacher data generated through MSEIS. Further, the OPI used data collected annually through the Achievement in Montana ([AIM](#)) statewide student information system to establish the poverty and minority quartiles for statistical analysis in the determinations of disproportionate rates of access to effective educators in Title I, Part A schools.

Through this evaluation, Montana verified that low-income and minority children enrolled in Title I, Part A schools are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers as defined in ESEA section 1111(g)(1)(B). This data is presented in the following tables.

Data Analysis for the 2018-2019 School Year

Table 1: Comparison of Poverty Quartiles by Percent of Ineffective, Out-of-Field, or Inexperienced Teachers

Poverty Quartiles	Percentage of Ineffective Teachers*	Percentage of Out-of-Field Teachers	Percentage of Inexperienced Teachers
Low Poverty	0.12%	0.00%	2.61%
High Poverty	0.39%	0.26%	3.58%

Percentages are calculated to the nearest hundredth.

*Consistent with ESEA section 1111(g)(1)(B) this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system. Since Montana is a local control state and does not collect data on local evaluations, the percentages reported for ineffective teachers is data on non-licensed teachers.

Table 1 Analysis

Table 1 displays the percentage of ineffective, out-of-field, or inexperienced teachers in all Title 1, Part A schools by high and low poverty quartiles. The analysis determined that in Montana, high poverty quartile Title I, Part A schools are not served at a disproportionate rate of ineffective, out-of-field, or inexperienced teachers. The difference between the low and high poverty quartiles for all three categories of teachers is less than 1%.

Table 2: Comparison of Minority Quartiles by Percent of Ineffective, Out-of-Field, or Inexperienced Teachers

Minority Quartiles	Percentage of Ineffective Teachers*	Percentage of Out-of-Field Teachers	Percentage of Inexperienced Teachers
Low Minority	0.22%	0.10%	2.64%
High Minority	0.34%	0.23%	3.36%

Percentages are based on quartiles demographics and calculated to the nearest hundredth.

*Consistent with ESEA section 1111(g)(1)(B) this description should not be construed as requiring a State to develop or implement a teacher, principal or other school leader evaluation system. Since Montana is a local control state and does not collect data on local evaluations, the percentages reported for ineffective teachers is data on non-licensed teachers.

Table 2 Analysis

In Table 2, the OPI team compared the percentage of ineffective, out-of-field, or inexperienced teachers in all Title 1, Part A schools, in 2019, by high and low minority quartiles. The analysis determined that in Montana, high minority quartile Title I, Part A schools are not served at a disproportionate rate of ineffective, out-of-field, or inexperienced. The difference between the low and high minority quartiles for all three categories of teachers is less than 1%.

Public Reporting of Disproportionate Rates of Access to Educators

As required by the ESSA, the OPI will publicly report the percent of teachers described and determined as ineffective, out-of-field, or inexperienced. The public reporting will be consistent with applicable federal and state privacy law and policies. The public report will be posted on the Montana OPI website, under the [ESSA tab](#).