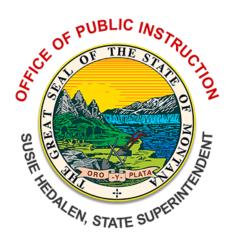
Economic Impact Statement Administrative Rules of Montana, Chapter 53, Subsection 4:

English Language Arts and Literacy Content Standards



Montana Office of Public Instruction May 2025

Table of Contents

ecutive Summary
<u>Introduction3</u>
Economic Impact Statement Required Elements5
Conclusion
Appendix A: Economic Impact Survey Responses 11
Appendix B: English Language Arts and Literacy Standards Revisions - Writing Task Force Members 16
Appendix C: English Language Arts and Literacy Standards Revisions - Review Task Force Members17
Appendix D: English Language Arts and Literacy Standards Revisions - Reconciliation Task Force Members17
Appendix E: English Language Arts and Literacy Standards Revision - Negotiated Rulemaking Committee18
Appendix F: Montana Office of Public Instruction Project Leadership and Support19

Executive Summary

In late 2023, with approval from the Montana Board of Public Education (BPE), the Superintendent of Public Instruction initiated a review of Montana's English Language Arts and Literacy Content Standards, as outlined in ARM <u>Title 10, Chapter 53, Subchapter 4.</u> This review ensures that public schools maintain rigorous and relevant standards that effectively support student learning and preparedness for life beyond school.

As required by § 20-7-101, MCA, these standards, part of the accreditation process, must be adopted by the BPE with the Superintendent's recommendation and developed through negotiated rulemaking. In compliance with § 2-4-405, MCA, the Office of Public Instruction (OPI) has prepared this economic impact statement in consultation with the Negotiated Rulemaking Committee (NRC).

To assess potential economic impacts of the proposed rule amendments to ARM 10.53.4, OPI surveyed school personnel and stakeholders. The survey was distributed via the OPI Compass newsletter to over 18,000 recipients, posted on the revisions website, shared with educational partners, and emailed directly to district and county superintendents.

Introduction

The Superintendent and OPI staff established an English Language Arts and Literacy (ELA) Standards Revision Task Force, which included Writing, Review, and Reconciliation Teams (see Appendix B, Appendix C, and Appendix D). The Development Team proposed revisions based on research from the Regional Education Laboratory Northwest, a U.S. Department of Education-funded organization, and aligned with the Superintendent's vision. The Review Team provided feedback, and final revisions were completed by a Reconciliation team before the final proposals were submitted to the Superintendent and the Negotiated Rulemaking Committee (NRC).

OPI staff (Appendix F) facilitated virtual and in-person meetings, supporting collaborative work on digital documents. The agency coordinated the task force's activities, presented its rationale to the NRC, and consulted the Montana Advisory Council on Indian Education (MACIE) for the integration of Indian Education for All.

The NRC (members listed in Appendix E) reviewed the proposed standards, meeting both virtually and in person from December 2024 to February 2025, and ensured consistency in content, format, vocabulary, and organization throughout the standards.

The rules proposals are listed below with a summary of changes:

The Superintendent's recommendations include:

- Repeal: 10.53.401-10.53.414 2011 English Language Arts and Literacy Content Standards
 - Due to the proposed streamlining and restructuring of the content standards, in an attempt to better support teaching and learning, it was determined that it would be cleaner to completely repeal the original standards and propose new standards.
- Adopt 10.53.414 Literacy Practices
 - New standards have been introduced to support the habits and skills of literate students for success in post-secondary education, careers, and community participation.
- Adopt 10.53.415- 10.53.426 Kindergarten through 12th Grade Content Standards
 - New standards that are aligned to the current content standards, but condensed and streamlined for educators. A few new standards have been implemented to better align with evidence-based reading practices. Domains within the standards include Foundational Reading (print concepts, phonemic awareness, decoding, encoding), Vocabulary, Fluency, Reading Comprehension, Writing, Research and Inquiry, and Speaking and Listening.
- Adopt 10.53.427 Glossary
 - Introduced to support understanding of the vocabulary within the content standards.

A detailed summary of the ELA standards, proposed revisions, and the process can be found here.

Economic Impact Statement Required Elements

Pursuant to § 20-7-101(1), MCA, the Montana Superintendent of Public Instruction prepared this economic impact statement in consultation with the NRC, in accordance with §2-4-405, MCA. Each required element of the economic impact statement is outlined below.

a) Affected Classes of Persons

Describe the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule. Refer to § 2-4- 405 (2)(a), MCA.

The proposed rule changes will impact the following groups: school district trustees, K-12 administrators, English Language Arts and Literacy educators, curriculum directors, school counselors, librarians, clerks/business officials, parents, and K-12 public school students.

Local school districts will be responsible for covering the expenses related to the implementation of these rule changes.

Beneficiaries of the rule changes include trustees, administrators, teachers, students, and the communities served by Montana's accredited schools.

b) Economic Impact

Describe the probable economic impact of the proposed rule upon affected classes of persons, including but not limited to providers of services under contracts with the state and affected small businesses, and quantify, to the extent practicable, that impact. Refer to § 2-4405 (2)(b), MCA.

The OPI surveyed school personnel and stakeholders regarding the probable economic impact of the proposed amendments to the ELA Content Standards. The survey was distributed as described previously and received responses from 58 individuals, including teachers, superintendents, principals, district curriculum directors, parents, taxpayers, and technology integration specialists. The summary results of the surveys are shown in <u>Appendix A.</u>

Estimated Costs for Curricular Resources

Even with survey responses, precisely estimating curricular costs remains complex due to the varied status of curriculum and professional learning across districts. Survey data indicates that approximately 50% of respondents anticipate needing partial curriculum updates, while 17% foresee comprehensive updates. Another 14% believe their current materials will suffice following the proposed revisions. To approximate the potential costs of replacing the ELA curriculum, the agency utilized survey data to determine anticipated costs. Specifically, approximately 50% of schools indicated the need for curricular

updates for the K-2 and 3rd-5th grade levels, increasing to 60% for the 6th-8th grade band and 57% for grades 9-12. Estimations below are provided based on these percentages. It is significant to note that when districts were surveyed regarding their financial capacity to update their English Language Arts (ELA) curricular resources, in accordance with the state standard revision timeline or at five-year intervals as mandated by Administrative Rules of Montana (ARM) 10.55.603, approximately 46% of those responding reported insufficient funds to undertake such updates.

Estimated Curricular Costs:

Grade Band	Estimated Number of Students	Estimated Cost per Student	Estimated % Updated Materials Needed	Total Cost by Grade Band
K-2	33,000	\$200	50%	\$3,300,000
3-5	33,000	\$150	50%	\$2,475,000
6-8	33,000	\$150	60%	\$2,970,000
9-12	44,000	\$150	57%	\$ 3,762,000

Estimated Total Costs for Curricular Resources for all Montana Schools:

=\$12,507,000

Estimated Costs for Professional Learning:

Metric	Value
Number of Districts in Montana	403
Estimated Cost of Professional Development per Day	\$500-\$2,500
Total Cost of Professional Development for 2 Days	\$403,000 - 1,007,500
Total Cost of Professional Development for 4 Days	\$806,000 - \$2,015,000

Estimated Range of Total Costs for Professional Development for all Montana Schools:

=\$403,000 - 2,015,000

Estimated total cost range of Curricular Resources & Professional Development: =\$12,910,000 - \$14,522,000

These estimated costs for curricular resources and professional development do not include the quantifiable time allocated to revisions for professional learning, planning, and implementation.

Furthermore, these figures represent initial implementation year expenses for the content standards and do not account for recurring costs associated with consumables or technology-based licenses.

(b) Cost to State Agencies

Describe and estimate the probable costs to the agency and any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue. Refer to § 2-4- 405 (2)(c), MCA

The Office of Public Instruction (OPI), as required by § 20-7-101, MCA, has incurred costs for the standards revision task force and the negotiated rulemaking process. Convening the task force for in-person writing sessions costs approximately \$13,000. The negotiated rulemaking process, including a contracted facilitator, NRC meetings, and NRC travel costs around \$12,000. Additional expenses for implementing the proposed rule changes, such as creating guidance documents with task force experts and providing professional learning, are estimated at \$20,000, bringing the total projected cost to about \$46,000, excluding staff time absorbed through regular duties.

Metric	Estimated Costs
Task Force Revisions Costs	\$13,000
Negotiated Rulemaking Costs	\$12,000
Agency Costs for Professional Learning	\$20,000

Estimated total cost for the Office of Public Instruction:

= \$46,000

The Board of Public Education (BPE) will incur filing fees for public hearing notices and publication fees for adoption and amendment notices with the Secretary of State, estimated at \$60 per page. Costs for board member attendance at public hearings will be covered within the BPE's existing budget.

c) Costs and Benefits of the Proposed Rule

Analyze and compare the costs and benefits of the proposed rule to the costs and benefits of inaction. Refer to § 2-4-405 (2)(d), MCA.

The State Superintendent initiated the process of amending the accreditation and aligning content standards per the established schedule by the BPE.

d) Less Costly or Less Intrusive Methods

Are there less costly or less intrusive methods for achieving the purpose of the proposed rule? Refer to § 2-4-405 (2)(e), MCA.

There is no less costly or less intrusive method for achieving the purpose of the proposed rule changes.

e) Selection of Proposed Rule

Analyze any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule. Refer to § 2-4-405 (2)(f), MCA.

To achieve the proposed rule's objectives, alternative methods were explored. However, given the substantial influence of content standards on English Language Arts and Literacy instruction and overall school quality, alongside the obligation for negotiated rulemaking, it was concluded that no alternative approach could effectively develop content standards focused on learner outcomes and educational excellence. To maximize cost-efficiency, meetings were conducted through a combination of in-person and virtual formats and relied on digital documents to support the work of the committees.

f) Efficient Allocation of Public and Private Resources

Does the proposed rule represent an efficient allocation of public and private resources? Refer to § 2-4-405 (2)(g), MCA.

The proposed rule amendments do not involve any specific allocation of public and private resources.

Conclusion

The NRC, through consensus, determined that the rule amendments should be surveyed for economic impact and supported the creation of the survey questions. <u>Appendix A</u> shows the responses and the demographics of the 58 respondents to the survey.

The economic and logistical impact of implementing Montana's revised K-12 English Language Arts and Literacy (ELA) standards spans several critical areas, including core and supplemental curricular resources, staffing, professional learning, and time, all of which pose significant cost implications for districts across the state.

Survey data indicates that about half of the respondents expect partial curriculum updates for the proposed ELA content standards, with fewer anticipating comprehensive updates. Cost estimations suggest roughly half of elementary schools need material updates, increasing slightly for middle and high school levels. A significant portion of surveyed districts reported insufficient funds for these updates within the state's

revision timeline.

There was inconsistency among respondents regarding which grade band would require more curricular support, likely due to the diverse curricula currently in use across the state. While some expressed confidence in their updated materials aligning with evidence-based reading practices and viewed the streamlined standards as offering greater flexibility, others indicated a need for a comprehensive update.

Initial costs for curriculum adoption are estimated between \$150 and \$250 per student, depending on the grade level, with ongoing expenses such as digital access fees, consumable materials, and routine updates further stretching district budgets over time. Including cursive in second grade was also indicated as a component that would cause an increase in curricular needs, as cursive was not required in the previous standards.

There was inconsistency in terms of which grade band respondents thought would need more support for curricular materials. This is partially due to the large variation in curriculum adopted across the state. While many respondents said they had confidence that their materials are updated and aligned with evidence-based reading practices and that the streamlining of the standards only allows for more flexibility, others indicated they needed a comprehensive update.

While Literacy Practices are new standards within ARM, they may not require updating curricular materials. Rather, they are instructional practices that encourage students to practice the habits and skills of literate learners. Due to the revisions in the earlier grades having more comprehensive foundational reading standards, there is potential that many districts will need updates for these specific and critical standards. As the only new content standards that span K-12 are specific to IEFA research requirements, this may also have a fiscal impact, ensuring districts have resources available for such student research tasks. In the secondary grades, two key content standards are new, involving reading multisyllabic words and fluency. While many materials could be adapted, districts may choose to purchase supplementary resources to support their teachers in these new, but pertinent, standards.

Professional development is also a major cost driver, with daily training sessions estimated at around \$500 - \$2,500 per day. This highlights the necessity of sustained funding to meet professional learning requirements as teachers learn new instructional approaches and implement new curriculum.

Although the standard updates are mostly aligned with the previously adopted Montana Content Standards, and therefore the Common Core State Standards, large curriculum companies will likely not make adaptations to their curriculum to align their texts to our standards, as evidenced by the lack of including Indian Education for All as required in Montana's Content Standards. Notwithstanding the prior inclusion of IEFA considerations in the previous set of standards, numerous respondents emphasized the necessity for developing or disseminating more pertinent resources to facilitate instruction.

As ELA is required to be taught K-12, with four credits required in high school, there should not be additional needs for staffing the core curriculum. Some districts indicated the need for expanded staffing to

support interventions in alignment with evidence-based practices, while others said they had adequate staffing regardless of the changes. To ensure strong implementation, many mentioned the need for literacy instructional coaches, with varying levels of districts that already have this position within their district.

Finally, the logistics of professional development, including organizing travel for remote districts, arranging substitute teachers, and scheduling sessions outside of instructional hours, represent considerable time and resource commitments for both teachers and administrators.

The OPI believes that there will be an economic impact on partial curriculum resources for grade levels K-12. Due to the revisions in the earlier grades having more comprehensive foundational reading standards, there is potential that many districts will need updates for these specific and critical standards. There is also the impact of providing additional professional development to staff for adequate implementation to support teachers with alignment and understanding of the standards and evidence-based practices.

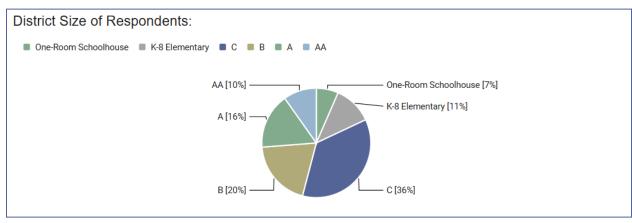
The anticipated costs for initial implementation for districts, should they need to update curricular materials, range from **\$12,910,000 - 14,522,000**, including curricular costs and professional development.

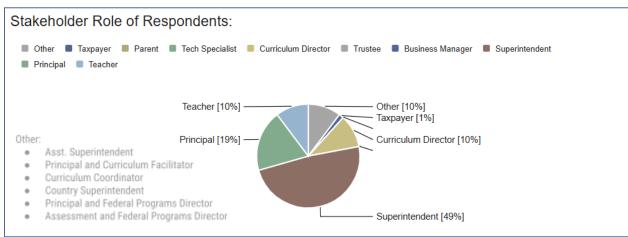
The Superintendent's recommendations to the BPE will be evaluated by the BPE and then facilitated through the Montana Administrative Procedure Act (MAPA) process before any adoption of proposed standards changes is implemented.

Appendix A: Economic Impact Survey Responses

The following information is a summation of the different questions asked in alignment with the requirements of the Economic Impact Statement.

DEMOGRAPHICS OF RESPONDENTS:

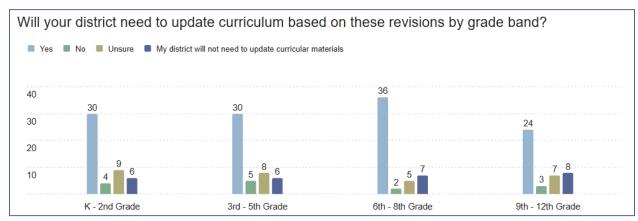


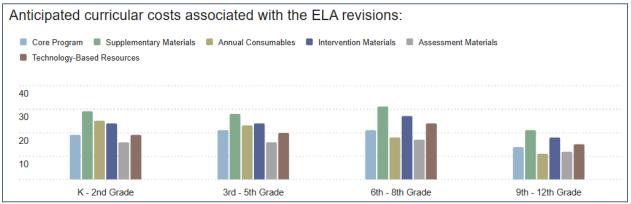


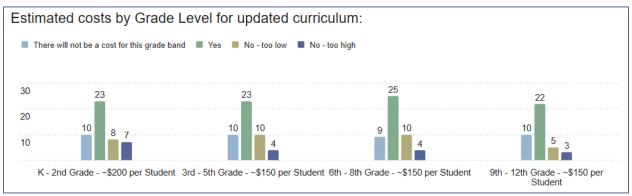
Grade Bands Served:				
Grades	K - 2nd Grade	3rd - 5th Grade	6th - 8th Grade	9th - 12th Grade
Choice Count	51	50	54	37

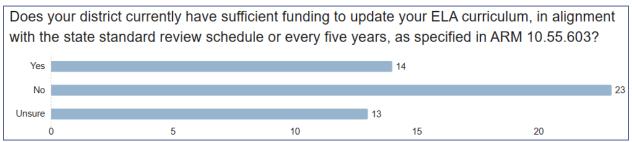
11

CURRICULAR CONSIDERATIONS:









Summary of Feedback on Curriculum and Resource Implications of Revised ELA Standards

Stakeholder input from districts across Montana reflects widespread recognition of the need to review and align English Language Arts (ELA) curriculum and instructional practices with the revised state standards. While some districts are further along in this process, common themes emerged around curriculum gaps, instructional resource needs, professional development, and funding. These insights offer a valuable window into the early implementation landscape and should inform legislative planning, budgetary considerations, and support strategies.

Curriculum Alignment and Evaluation

- Some districts recently adopted new ELA curricula (as recently as Spring 2024) and are piloting or preparing for future adoptions. Others use outdated materials developed under the 2011 standards.
- Full alignment with the new standards may require updates, particularly in foundational reading skills, research, writing expectations, and literacy practices across grade bands.
- Many districts anticipate needing supplemental materials rather than full program replacements, such as
 writing resources, texts aligned to new foundational reading standards, handwriting and cursive curricula,
 and materials supporting text-based research.
- Several districts are conducting curriculum audits, updating scope and sequences, and preparing to revise priority standards and proficiency scales.

Materials for Indigenous Perspectives and IEFA Integration

- There is a clear need to increase the availability and diversity of texts featuring Montana's Indigenous perspectives at each grade level.
- Although some districts have made progress in supporting Indian Education for All (IEFA), additional materials may be necessary to meet the full intent of the standards.

Professional Development

- Educators require support in understanding and implementing the new standards, including aligning daily instruction to the shifts in expectations and understanding content progression across grade levels.
- Several districts highlighted a need for targeted training on foundational reading instruction grounded in the science of reading, especially in the primary grades and for the extension of fluency and multisyllabic word decoding in the secondary grades.
- Where new materials are being adopted or piloted, professional development is needed to effectively use and adapt those materials to meet Montana's unique standard structure.
- Teachers want to understand the rationale and research base behind the standard changes, particularly how they differ from prior frameworks like Common Core.

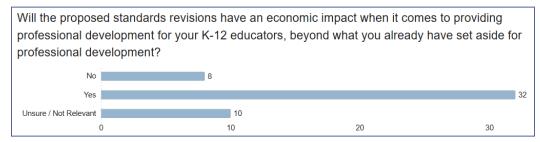
System-Wide Considerations

- Districts anticipate that aligning to the new standards may require revising scope and sequences, updating
 priority standards, and reworking proficiency scales—a process that could span multiple years. Some have
 indicated that because of the streamlining of the standards, they will not have to put the same amount of
 effort toward prioritizing standards as they did for the 2011 standards.
- While some view the revisions as an opportunity for greater instructional flexibility and innovation, they also highlight the need for thoughtful planning and support.

Curricular Costs

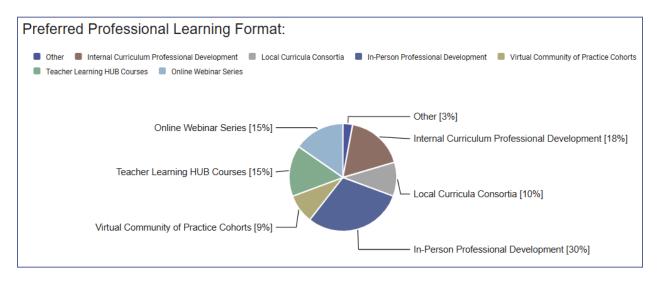
- Feedback from respondents generally aligned with the proposed costs per student, though the range for new materials varied from \$50 per class to \$500 per student.
- Supplemental materials, such as annual consumables and technology licenses, would be in addition to the core curricular updates that are needed.

PROFESSIONAL DEVELOPMENT CONSIDERATIONS:









Summary of Feedback on Professional Development Implications of Revised ELA Standards

- In-person, ongoing professional development is the preferred and most effective method.
- Significant teacher time is needed for curriculum alignment, often requiring substitute coverage.

This can be particularly challenging in rural areas.

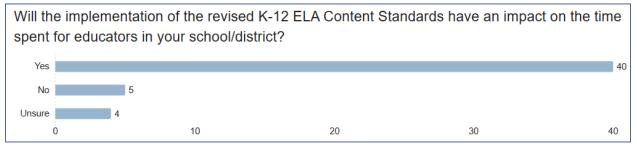
- Key expenses include professional development providers, substitutes, materials, travel, stipends, and online platforms, with small districts potentially facing costs of \$14,000–\$20,000 and larger districts upwards of \$100,000.
- Needs and capacity vary depending on district size and location. Larger districts have a greater impact on state data, while smaller districts may benefit from consortia or facilitator support.
- Deep learning initiatives (e.g., science of reading) and the realignment of curriculum and assessments require phased and well-supported PD.

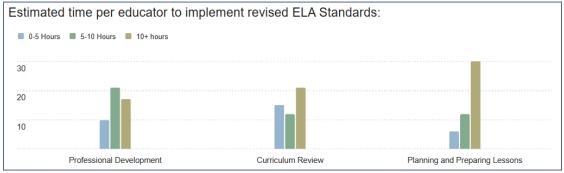
STAFFING CONSIDERATIONS

Summary of Feedback on Staffing Implications of Revised ELA Standards

- Some districts anticipate the need for additional ELA instructional facilitators, interventionists, or reading specialists, especially at the elementary and secondary levels.
- Many secondary teachers lack training in the science of reading; some districts indicated that additional staff
 or targeted support may be necessary for effective implementation.
- Districts may require literacy coaches, curriculum specialists, or consultants to support teachers with planning, differentiation, and standards alignment.
- Small and rural districts face unique challenges with staffing shortages and combined classrooms; additional support is needed to meet diverse student needs.
- Several districts note that adding staff is not financially feasible, despite clear instructional needs tied to standards implementation.
- Adjustments in classroom size, staffing ratios, and hiring practices may be necessary to meet new instructional demands. Cross-curricular collaboration may also influence staffing models and planning time.

TIME CONSIDERATIONS:





Summary of Feedback on Time Implications of Revised ELA Standards

Time and Implementation Demands

- Restructuring of year-long curricular plans, unit plans, lesson plans, and assessments will be extensive.
- Full implementation of the new standards is expected to take 2–3 years, with the first year being the most demanding.
- Implementation requires ongoing planning and alignment with each unit, especially in the first year.

Collaboration and Teacher Time

- Significant collaboration time is needed for unpacking standards, creating proficiency scales, and aligning curriculum.
- Lack of substitutes and limited funding for stipends make it difficult to secure time for collaborative work during contract hours.
- Teachers and administrators require dedicated time for professional learning and curriculum redesign.

Professional Development

- Teachers need time to learn and understand the revised standards and instructional shifts.
- Professional learning should include guidance on instructional expectations, rationale behind changes, and integration into classroom practice.
- PD aligned with the science of reading may be necessary, especially for districts new to the research and instructional implications..

Phased and Sustainable Approach

- Districts recommend a phased implementation model with built-in time for learning, planning, and reflection.
- Change management should account for teacher variability in adoption and provide support structures to ensure meaningful, long-term integration.

Appendix B: English Language Arts and Literacy Standards Revisions - Writing Task Force Members

Task Force Member Name	Location	Assigned Roles
Dana Fitzgale	Florence	K-2 Writing Team
Genevieve Thomas	Whitefish	K-2 Writing Team
Amber Byrd	Helena	3-5 Writing Team

Abby Kuhl	Helena	3-5 Writing Team
Will Dickerson	Bozeman	3-5 Writing Team
Dana Haring	Kalispell	6-8 Writing Team
Karen Polari	Sidney	6-8 Writing Team
Antonia Malchik	Whitefish	6-8 Writing Team
Kristina Matthews	Highwood	6-8 Writing Team
Jeff Ross	Lolo/Belt	9-12 Writing Team
Kathy Pfaffinger	Billings	9-12 Writing Team
Erin Hunt	Helena	9-12 Writing Team
Caitlin Chiller	Livingston	9-12 Writing Team

Appendix C: English Language Arts and Literacy Standards Revisions - Review Task Force Members

Review Team Member Name	Location	Assigned Role
Jeanne Wdowin	Kalispell	K-12 Review
Andrea Meiers	Billings	K-12 Review
Beverly Chin	Missoula	K-12 Review
Kari Dahl-Huff	Billings	K-12 Review

Appendix D: English Language Arts and Literacy Standards Revisions - Reconciliation Task Force Members

Reconciliation Team Member Name	Location	Assigned Role
Kristina Matthews	Highwood	6-8 Writing Team

Kathy Pfaffinger	Billings	9-12 Writing Team
Will Dickerson	Bozeman	3-5 Writing Team
Dana Haring	Kalispell	6-8 Writing Team
Amber Byrd	Helena	K-2 Writing Team
Andrea Meiers	Billings	K-12 Review
Casey Olson	Columbus	K-12 Reconciliation

Appendix E: English Language Arts and Literacy Standards Revision - Negotiated Rulemaking Committee

NRC Member Name	Location	Assigned Representation Role
Justine Alberts	Helena	K-12 School Administrator, Parent, Taxpayer
Nicole Simonsen	Culbertson	K-12 School Administrator
Tawny Cale	Great Falls	K-12 Educator, MT Tribe Representative
Jodi Carlson	Billings	Higher Education Faculty
Clifton Grilley	Power	Parent
Janelle Beers	Dillon	Parent, Taxpayer, K-12 Educator
Barbara Frank	Missoula	K-12 Administrator, Parent, Taxpayer
Crystal Kain	Polson	K-12 School Administrator, K-12 Teacher, Parent
Erin Ellis	Missoula	School Administrator, K-12 Educator
Logan Brower	Boulder	K-12 Educator
Sue Corrigan	Kalispell	School District Trustee, K-12 Teacher, Parent, Taxpayer
Allissa Christensen	Whitehall	Business Official
Jacie Jeffers	Billings	K-12 Educator, MT Tribe Representative

McCall Flynn	Helena	BPE Executive Director
Christy Mock-Stutz	Helena	OPI Assistant Chief Program Officer
Marie Judisch	Ledger	OPI Senior Manager of Teaching and Learning

Appendix F: Montana Office of Public Instruction Project Leadership and Support

- Susie Hedalen, Superintendent of Public Instruction
- Christy Mock-Stutz, Assistant Chief Program Officer
- Julie Murgel, Chief Operating Officer
- Marie Judisch, Teaching and Learning Senior Manager
- Aimee Konzen, Professional Learning Manager
- Claire Mikeson, English Language Arts and Literacy Instructional Coordinator
- Michelle McCarthy, MT, OPI Science Coordinator
- Katrina Engeldrum, MT OPI Mathematics Coordinator
- Jackie Ronning, MT OPI Early Literacy Specialist
- Matt Bell, MT, OPI Culture and Language Specialist
- Crystal Hickman, American Indian Student Achievement Specialist
- Michele Henson, American Indian Student Achievement Specialist
- Serena Wright, Title III EL Specialist
- Mike Jetty, Indian Education For All Specialist
- Alicia Doney, American Indian Youth Coordinator
- Jennifer Stadum, Indian Education for All Specialist