

Economic Impact Statement for Content Standards Revision Career and Technical Education

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Economic Impact Statement for Content Standards Revision Career and Technical Education

Executive Summary

Using a negotiated rulemaking process involving stakeholder groups, Superintendent of Public Instruction Elsie Arntzen has developed recommendations for the revision of the Montana Career and Technical Education Content Standards. The current Career and Technical Education standards were adopted in 2006. In order to benefit students, it is important to implement standards that are based on current knowledge and understanding of best practices for Career and Technical Education instruction to ensure that Montana schools provide students with the up-to-date, rigorous learning expectations across the range of Career and Technical Education learning opportunities.

The K-12 content areas covered by the career and technical education standards may include:

- a. act as a responsible and contributing citizen and employee
- b. apply appropriate academic and technical skills
- c. attend to personal health and financial well-being
- d. communicate clearly, effectively, and with reason
- e. consider the environmental, social and economic impacts of decisions
- f. demonstrate creativity and innovation
- g. employ valid and reliable research strategies
- h. utilize critical thinking to make sense of problems and persevere in solving them
- i. model integrity, ethical leadership, and effective management
- j. plan education and career path aligned to personal goals
- k. use technology to enhance productivity
- l. work productively in teams while using cultural/global competence.

Students will learn career and technical education content across programs of study, also known as Career Pathways, and integrated with academic content.

The Office of Public Instruction (OPI) surveyed school districts in winter and spring of 2020 about the impacts of the proposed standards on district resources for staffing, instructional materials, curriculum development, and professional development. Sixty-nine percent of respondents indicated that their district could implement the proposed standards using existing resources. Of the remaining respondents, many of these districts face challenges in meeting the current standards and are concerned with the additional professional development needed with the expansion of the standards to K-6. A majority of the respondents in this group indicated that they need additional instructional materials, personnel and professional development. Fifty seven percent noted that they will have a shortage of teachers endorsed in career and technical education.

The OPI has identified \$1,305 to support the implementation of the proposed career and technical education standards. This funding will provide online professional development opportunities. The OPI will also develop a model curriculum guide to assist school districts with curriculum development. For those districts that are having trouble meeting the current standards, the statewide trainings and model curriculum guide may provide more support than the districts are presently receiving.

Based on the analysis of the survey results and the advice of the negotiated rulemaking committee, the OPI has concluded that the school district expenditures required under the proposed standards are insubstantial expenditures that can be readily absorbed into the budgets of existing district programs.

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Introduction

Content standards are adopted by the Board of Public Education through the administrative rulemaking process. The content standards for thirteen academic subject areas are promulgated in Title 10, Chapters 53 and 54. The content standards are used by school districts to develop local curriculum and assessments in all the content areas that include the arts, career and technical, English language arts, English language proficiency, health enhancement, library media, mathematics, science, social studies, technology, traffic education, workplace competencies, and world languages. The K-12 content standards describe what students shall know, understand, and be able to do in these content areas.

This economic impact statement analyzes the impact of the proposed revisions to the Montana Content Standards as prescribed in [2-4-405, MCA](#).

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 Section 2-4-405 (2)(a).

The individuals who will be affected by the proposed Career and Technical Education content standards are those persons who have responsibilities for implementing the Career and Technical Education standards at the local level. These responsibilities include allocating resources for curriculum development and coordination, developing and adopting curriculum, delivering curriculum in the classroom, supporting students in meeting learning goals, and paying for any changes that are required by the standards. The affected classes include school administrators, teachers, school trustees, school business officials, parents, students, and taxpayers.

The beneficiaries of the proposed rule are students and the educators and parents who educate those students. In order to benefit students, it is important to implement standards that are based on current knowledge and understanding of best practices for Career and Technical Education instruction to ensure that Montana schools provide students with the up-to-date learning expectations across the range of Career and Technical Education learning opportunities.

Further benefits of the revised rules relate to the structure of the proposed standards. The Montana Career and Technical Education Content Standards from 2000 included five content standards with three benchmarks all for the secondary level. The proposed standards integrate Montana's Indian Education for All. The proposed standards are organized by grade level for grades K-5, and by grade band for grades 6-8 and 9-12. The benefit of having grade level standards from K-5 is to clarify learning expectations for the elementary teacher who is responsible for teaching all standards in all content areas. The 6-8 and 9-12 grade bands provide clarity of expectations while allowing flexibility of staffing and program delivery at those grade levels.

The proposed standards do not require that all schools offer courses in every discipline. While the Superintendent of Public Instruction is recommending changes to the Career and Technical Education content standards, the Career and Technical Education program delivery standards (ARM 10.55.1701) do not have recommended changes.

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The proposed standards will also benefit higher education institutions who prepare Montana's pre-service teachers with alignment to high-quality, college-and-career ready learning expectations.

The costs of the proposed rules will be borne by local school districts and their taxpayers as well as the Office of Public Instruction (OPI). To support the implementation of the proposed standards, the OPI will provide professional development opportunities and include supplemental materials that districts can use to assist in curriculum development.

The OPI will provide workshops at state conferences for educators, provide regional and site-based workshops, help design a model curriculum guide and instructional resources accessible on the OPI website, and offer online professional development for educators through the OPI Teacher Learning Hub (Hub).

The Hub is an online interactive professional learning network dedicated to providing free high quality professional development and training for all K-12 educators throughout Montana. As part of the OPI's service to Montana schools, the Hub's readily accessible learning opportunities aim to minimize the time teachers spend away from their classrooms to attend trainings as well as save school districts money on professional development costs. The Hub offers facilitated and self-paced modules, as well as a video library with a variety of trainings that support instruction, positive school climate, and student success.

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 quantifying, to the extent practicable, that impact. Refer to Section 2-4-405 (2)(b).

The Office of Public Instruction (OPI) conducted a survey of schools to assess the impacts of the proposed rule between January and May 2020. A total of 65 responses were received from superintendents, principals, district clerks, curriculum coordinators, teachers, and county superintendents. Not all questions were required to complete the survey. The respondents represented all school class sizes (AA- small schools) and all grade levels (elementary - high school).

Forty-five of the 65 respondents (69%) indicated that their district would be able to meet the proposed standards within existing resources. Twenty-four of the respondents (41%) indicated that the proposed standards would not require their district to substantially revise the district's current curriculum.

The majority of the respondents (65%) indicated that their school systems could meet the proposed standards without imposing additional costs for personnel. The proposed rule does not require schools to hire additional Career and Technical Education teachers. Specifically, the proposed rule is written in a manner that recognizes that elementary teachers (with an elementary endorsement) are most often the teachers who deliver the Career and Technical education curriculum in grades K-5. Fifty-seven percent expect to have a shortage of teachers endorsed to teach the proposed standards. The issue of teacher shortages for Career and Technical Education may be part of Montana's larger challenges with recruitment and retention of teachers in general, rather than a challenge associated with the proposed standards.

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The OPI does not anticipate that providers of services under contract with the state or small businesses will be affected by the proposed rules. It is possible that school districts will replace existing instructional materials and supplies, which may be a minor benefit to local service providers.

Cost to State Agencies

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

The Office of Public Instruction (OPI), in accordance with 20-7-101, MCA, has incurred costs associated with the negotiated rulemaking process, including contracting with a facilitator and convening the rulemaking committee. The OPI also pays for rule filings and publication of notices with the Secretary of State for standards revision. The OPI does not anticipate any additional costs associated with the accreditation of schools. The new standards will be incorporated into the OPI's accreditation review process within the existing budget of the OPI.

The Board of Public Education is responsible for the adoption of content standards. The costs associated with board member attendance at public hearings will be paid within the existing budget of the Board of Public Education.

In addition to the costs associated with the rulemaking process, the OPI will incur costs associated with providing professional development opportunities. The OPI has estimated \$1,305 budgeted (from sources at OPI) to assist with the implementation of the proposed rule. The OPI plans to offer free professional development online through the Teacher Learning Hub in addition to providing professional development across Montana.

Cost 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 Section 2-4-405 (2)(d).

The Board of Public Education has adopted a regular cycle for review of content area standards. The purpose of the regular review of standards is to ensure that content standards reflect current knowledge and best practices for each content area. The proposed Career and Technical Education content standards provide clear benchmarks for what students should know as they move through the K-12 grades.

The majority of the costs associated with the proposed standards are for ensuring that teachers understand the new Career and Technical Education standards and have acquired current knowledge and best-practice instructional strategies to support engaged student learning and understanding in Montana K-12 classrooms. These proposed standards provide teachers and students a wide range of up-to-date Career and Technical Education teaching and learning opportunities that connect Career and Technology to our students' lives and the world around them.

The proposed standards will benefit teaching and learning in the following ways:

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- The standards are now K-12 standards, exposing students to Career and Technical Education beginning in primary grades.
- Students will learn career and technical education content across programs of study, also known as Career Pathways, and integrated with academic content.
- The standards can be incorporated into multiple programs of studies and academic content areas.
- The revised standards integrate Montana's Indian Education for All and the *Essential Understandings Regarding Montana Indians*.

The following addresses four areas of potential economic impact on school district operations and budgets.

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Personnel

The proposed standards were developed with the expectation that the K-5 Career and Technical curriculum will be delivered by elementary teachers with the 00 elementary endorsement. At the middle school and high school levels, districts will need teaching staff with endorsements in one of the Career and Technical Education endorsable areas.

Thirty-five percent of respondents said that the Career and Technical Education standards would impose additional costs for personnel beyond what is required to implement current standards. Others commented that the grade level standards in grades K-5 would require additional instructional time and professional development for teachers with K-5 students. It is important to emphasize that there is no requirement in the proposed standards for additional instructional time be allocated to Career and Technical Education. There are also no requirements for additional teaching endorsements. However, districts and teachers will need time to integrate the new standards into their curriculum and lesson plans.

The Office of Public Instruction (OPI) does anticipate that more time will be required for educators to increase their knowledge of Career and Technical Education topics and to align curriculum and instruction to the proposed grade level standards. The OPI has developed a plan for providing professional development to educators and administrators who are responsible for delivering the Career and Technical Education standards. This plan is outlined under the Professional Development section of this statement.

Curriculum and Instructional Materials

Twenty-four of the respondents (41%) indicated that they would not need to substantially revise their existing Career and Technical Education curriculum to implement the proposed standards, with twenty-six of the respondents (45%) indicating that they may need to revise their current curriculum. The OPI will provide a model curriculum guide and instructional resources for the Career and Technical Education standards once the proposed rule is adopted. The guide will be useful to districts as they begin the review and revision of their current Career and Technical Education curriculum.

Forty of the respondents (69%) included that there would be additional costs for instructional materials beyond that is required to implement the current standards. Fifteen of the respondents (27%) indicated that they would have difficulty finding instructional materials to implement the proposed standards with twenty-two respondents (39%) indicating that they may have trouble.

Districts are likely to follow a combination of one or more of four approaches to revise their curriculum and identify supporting instructional materials:

- Identify the gaps in their existing curriculum and make adjustments to align with the proposed standards;
- Adapt and adopt the model curriculum guide developed by the OPI;
- Adapt and adopt the curriculum materials provided by their local curriculum consortium or the Montana Small Schools Alliance; or
- Adapt and adopt curriculum materials that are aligned to the state standards and available online.

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As stated in the previous section, it is likely that Career and Technical Education teachers will need time away from their classrooms to work on curriculum development both at the school and through professional development opportunities. Districts will incur costs for substitutes and travel expenses to curriculum consortia meetings and conferences.

If school districts determine that updated or additional instructional materials are needed to implement their revised curriculum, the cost of these instructional materials will be borne by the school district.

Professional Development

The OPI anticipates that at least one elementary teacher at each school will need to be trained on the Career and Technical Education standards. A common practice of school districts is to send one or two lead teachers to training; these teachers are then responsible for sharing information and resources with their colleagues to implement the necessary curriculum revisions. The lead teachers will need approximately three hours of professional development time to learn about the new standards.

Career and Technical Education teachers at the middle school and high school levels will also need to be trained on proposed standards. Career and Technical Education teachers at every grade level will need access to professional development opportunities that will help integrate the new standards into their curriculum guides.

The OPI's implementation plan includes presentations at state conferences (when appropriate) and course creation on the Teacher Learning Hub.

The OPI will provide a curriculum guide for the Career and Technical Education standards once the proposed rule is adopted. The guide will be useful to districts as they begin the review and revision of their current Career and Technical Education curriculum. The guide will also help districts incorporate Indian Education for All into their Career and Technical Education curriculum.

If school districts determine that additional professional development is needed to implement their revised curriculum, the cost of these professional development will be borne by the school district.

The budget for implementing the OPI's professional development plan consists of the professional time and effort to develop a model curriculum guide and create professional development.

The cost of inaction would compromise the quality of educational opportunity in Career and Technical Education for Montana students. The adoption of statewide Career and Technical Education standards and expectations for what students should know reduces the Career and Technical Education programs and course offerings disparities that may occur across the state.

Less Costly or Less Intrusive Methods

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

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No. The process for proposing, reviewing, and adopting academic content standards is prescribed in statute in 20-7-101, MCA and in Montana Administrative Procedure Act. It is not possible to have statewide implementation of standards without formal rule adoption.

The role of the Board of Public Education is to set standards that apply to all accredited schools. The proposed rules reflect a set of best practices identified by educators that establish a minimum level of quality for all schools to meet. While there are school district costs associated with the implementation of these standards by school districts, the Office of Public Instruction will offer and coordinate professional development opportunities in a manner to reduce the burden of costs on school districts.

The proposed rule for revising the Career and Technical Education content standards includes the following Statement of Reasonable Necessity:

The Board of Public Education has determined it is reasonable and necessary to adopt, amend, and repeal rules relating to Career and Technical Education content standards pursuant to ARM 10.54.2503 Standards Review Schedule and 10.53.104 Standards Review Schedule. The board has determined that to stay consistent with the legislative intent of [20-1-102](#) and [20-9-309, MCA](#), it must review and make contemporary amendments to its standards. The Legislature recognizes the need to reassess educational needs on a cyclical basis and the board recognizes its standards represent the minimum standards. These standards are the basis upon which a quality system of education is built and maintained. The board strives to conform to a regular review cycle for every chapter of accreditation. The standards review process shall use context information, criteria, processes, and procedures identified by the Office of Public Instruction with input from representatives of accredited schools and in accordance with the requirements of 20-7-101, MCA.

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 Section 2-4-405 (2)(f).

In recent years, the Office of Public Instruction (OPI) has promoted educator best practices and updated information on Career and Technical education. However, this has not reached all schools or all educators. With the adoption of the proposed Career and Technical Education standards, all schools and educators will be seeking updated information and best practices in Career and Technical education.

Montana's Career and Technical Education Standards have not been revised for 20 years. The OPI received requests from teachers and schools to revise the standards so schools could be assured they are providing quality Career and Technical education. School districts are interested in revising their curriculum based on current Career and Technical information and pedagogy. The Board of Public Education agreed to move forward with the Superintendent's request to begin the process for Career and Technical Education standards revision.

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Efficient Allocation of Public and Private Resources

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

Yes, the proposed content standards will apply to all public and any private schools seeking accreditation by the Board of Public Education.

Data Gathering and Analysis

Quantify or describe the data upon which the economic impact statement was based and an explanation of how the data was gathered. Refer to Section 2-4-405 (2)(h).

The Office of Public Instruction disseminated an electronic survey tool to all school districts in the state. The recipient list included superintendents, principals, district clerks, and county superintendents. Many school districts shared the survey tool with teachers and curriculum coordinators. The survey was available for five months. The existing standards and proposed standards were linked to the survey tool, so that respondents could compare the two. Please see the OPI [Content Standards Revision](#) webpage for more information.

Attached to this economic impact statement is a summary of the results from respondents. (Attachment A)

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Applicable Statute

2-4-405. Economic impact statement. (1) Upon written request of the appropriate administrative rule review committee based upon the affirmative request of a majority of the members of the committee at an open meeting, an agency shall prepare a statement of the economic impact of the adoption, amendment, or repeal of a rule as proposed. The agency shall also prepare a statement upon receipt by the agency or the committee of a written request for a statement made by at least 15 legislators. If the request is received by the committee, the committee shall give the agency a copy of the request, and if the request is received by the agency, the agency shall give the committee a copy of the request. As an alternative, the committee may, by contract, prepare the estimate.

(2) Except to the extent that the request expressly waives any one or more of the following, the requested statement must include and the statement prepared by the committee may include:

(a) a description of 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;

(b) a description of 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 quantifying, to the extent practicable, that impact;

(c) the probable costs to the agency and to any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue;

(d) an analysis comparing the costs and benefits of the proposed rule to the costs and benefits of inaction;

(e) an analysis that determines whether there are less costly or less intrusive methods for achieving the purpose of the proposed rule;

(f) an analysis of 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;

(g) a determination as to whether the proposed rule represents an efficient allocation of public and private resources; and

(h) a quantification or description of the data upon which subsections (2)(a) through (2)(g) are based and an explanation of how the data was gathered.

(3) A request to an agency for a statement or a decision to contract for the preparation of a statement must be made prior to the final agency action on the rule. The statement must be filed with the appropriate administrative rule review committee within 3 months of the request or decision. A request or decision for an economic impact statement may be withdrawn at any time.

(4) Upon receipt of an impact statement, the committee shall determine the sufficiency of the statement. If the committee determines that the statement is insufficient, the committee may return it to the agency or other person who prepared the statement and request that corrections or amendments be made. If the committee determines that the statement is sufficient, a notice, including a summary of the statement and indicating where a copy of the statement may be obtained, must be filed with the secretary of state for publication in the register by the agency preparing the statement or by the committee, if the statement is prepared under contract by the committee, and must be mailed to persons who have registered advance notice of the agency's rulemaking proceedings.

(5) This section does not apply to rulemaking pursuant to 2-4-303.

(6) The final adoption, amendment, or repeal of a rule is not subject to challenge in any court as a result of the inaccuracy or inadequacy of a statement required under this section.

(7) An environmental impact statement prepared pursuant to 75-1-201 that includes an analysis of the factors listed in this section satisfies the provisions of this section.

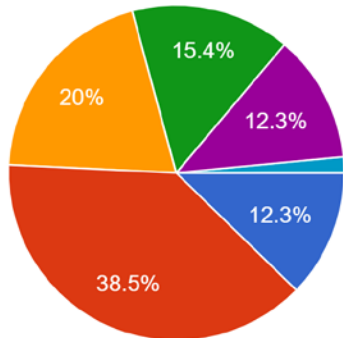
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Attachment A

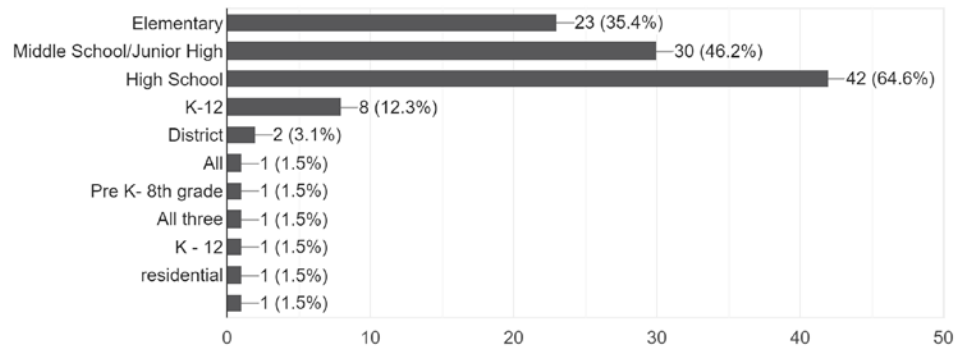
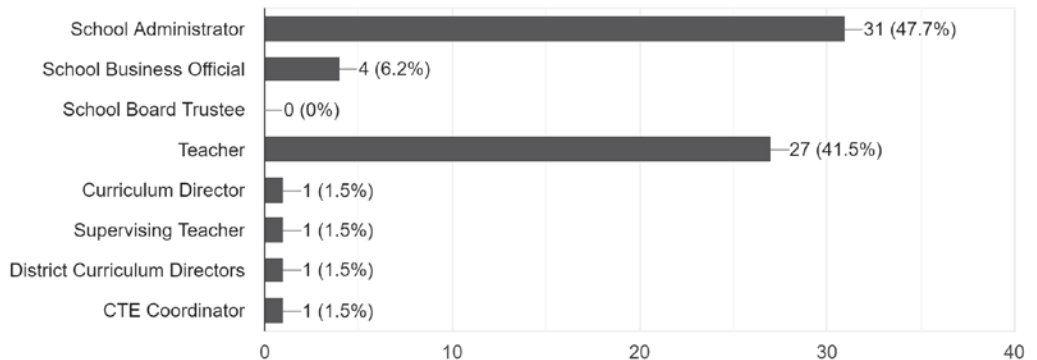
CTE Economic Impact Survey

Survey Demographics (n=65*)

*many of the questions were optional



- Small School (fewer than 126 students)
- Class C
- Class B
- Class A
- Class AA
- Represent 23 districts (approximately 12,200 students)



Content Standards Implementation

Question	Yes	No
Do you anticipate that your district will be able to meet the proposed standards with existing resources?	45 (69%)	20 (31%)
Will your district be able to implement the proposed program delivery standards for social studies?	38 (63%)	22 (37%)

The most significant challenges to implementation (select 2) were: Instructional Materials (69%), Personnel (45%), Professional Development (45%) and then Curriculum Development (38%).

Instructional Materials

Question	Yes	No	Maybe

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Would the proposed standards impose a cost for instructional materials beyond that required to implement the current standards?	40 (69%)	18 (31%)	
Will your district have difficulty finding instructional materials to implement the proposed standards?	15 (27%)	19 (34%)	22 (39%)

Additional Feedback:

“We currently use PLTW for grades K-8, but it is expensive for materials and training. The most difficult part is finding time in the day for these activities, then instructional materials and the funding to purchase those materials for those grade levels will be difficult to come up with.”

“Have been told over and over, “there is no additional money.” Our current resources will be outdated too (we haven’t completed a curriculum review since 2012).”

*“Start-up funds for additional programming.
Start up instructional materials are needed to increase programming options.
Instructional materials for start-up programs will be difficult to find.”*

“The cost to keep up with technology of industries has grown in the CTE lab. for example. Industries are using brand new computers and CTE labs are getting by with typewriters that they have gotten by with for the last 20+ years. I am not saying we need a large sum of money every year, but it would be nice to be able to purchase new equipment that would then last for 10+ years.”

“Finding AFNR-aligned materials can be difficult”

“CTE Curriculum is very broad and finding valuable instructional material is challenging. Because of the broadness of topics discussed a lot of time is wasted creating materials and assessments.... There really is no national progression of courses and material in CTE like there is in a core subject like math.”

“There will be costs associated with tech hardware and software as well as materials for the innovations and projects that the new standards will require of students.”

“We are a very small school (7 students) and while we have an impressive amount of technology available, we do not have the expertise or the funds to continue the rapidly changing technology.”

“We have not been able to find a business or computer teacher for a long time.”

“We do a good job with Middle School and High School but have not done elementary programming with a CTE emphasis. Some of the expectations are met with current programming from other curriculum and programming. If we need to hire another teacher to meet the proposed standards the cost of that and the elementary specific curriculum would be beyond the financial limits of our district.”

“We use Perkins funds for instructional and curriculum materials”

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What increase in total dollars would be required to cover the cost associated with Instructional Materials? (best estimate)

Answer Range: \$1,200- \$1,000,000

A few responses:

“\$100 per grade K-6 and potentially much more than that in a junior high or high school class.”

“About \$25K for equipment and supplies to start a Business Ed. program.”

“\$800k to 1 million. We don't have difficulty in finding the materials, we need funding to support the purchase of updated and ongoing consumables for CTE”

Personnel

Question	Yes	No
Would the proposed standards impose a cost for personnel beyond what is required to implement the current standards?	20 (35%)	37 (65%)
Will your district have a shortage of teachers endorsed to teach?	32 (57%)	24 (43%)

If you answered “yes” additional feedback:

“We currently have two CTE teachers. The standards call for career pathways along personal interests. We have 44 students in grades 9-12. This means there could be 44 different pathways based on each of those student's personal interests. This will not happen. Perkins V requires one pathway for a C school, which is doable. We are planning three different pathways for students. Even that does not allow for personal interest pathways. Students have to take what we offer, which we try to provide based on student interest. However, we can't change our CTE every year based on student interests.”

“There are additional costs to develop workforce experiences for students. Travel/time for teachers to connect with local employers, travel for students, subs for teachers to make those face-to-face meetings, costs for materials/supplies outside grant and classroom funds to support the standards.”

“We really need a CTE integration specialist who can work with teachers.”

“We would like to add a Career Counselor who would lead be responsible for the middle school CTE and also work as a lead Career Pathway Counselor for students 7-12.”

“Our district does not have a business teacher but we use other resources including MTDA and staff.”

“We are too small to have the availability of an endorsed teacher.”

“We are losing certified CTE staff due to retirement and have not found replacements for those long time teachers not to mention the possible need for an additional CTE instructor at the elementary level. You are trying to expand the CTE programming when there are currently no Teacher Education programs in Business or Industrial Arts Education in our state. This does not seem like progress or a positive move for CTE.”

“Several of our CTE staff are eligible for retirement. When they do retire, this will be struggle to replace”

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“Currently this standard is embedded into projects which are typically associated with other disciplines. Sometimes the stands are highlighted in stand-alone projects. We do not have a career and tech teacher in the primary level.”

Professional Learning

Question	Yes	No
Would the proposed standards impose a cost for professional learning beyond those expenses already required to implement the current standards?	31 (54%)	26 (46%)
Will your district have difficulty finding professional development opportunities for social studies educators?	30 (52%)	28 (48%)

Summary if answered “yes”

“This could be because my staff don't want to leave the classroom. However, training needs to be more about industry standards than CTE standards, CTE Manager, etc. Staff need to be able to meet with industry leaders to learn where they are going in the future and the impact for the classroom.”

“much of the training we provide is related to trauma and mental illness. We would need to explore a whole new area to find resources to train the teachers.”

“While PVCC does a good job of providing one or two CTE PD days, that's not enough for a whole program”

“We have to travel outside our district for any career and technical professional development”

“We need support with PD focused on deeper learning.”

“Most PD in the area is for core academic areas. Instructors usually have to travel and miss work time to engage in quality PD for CTE programs.”

“Besides professional development associated with the CTE programs themselves, skill development and certification training is difficult to find and fund. Finding the training that works for the time frames my teachers are available for training is the hard part.”

“Targeted professional development for specific areas in Class A sized districts is usually centered around a single teacher and a Career Pathway, so getting 1 teacher trained presents challenges.”

“Attending professional development activities is expensive. Our district does not provide any financial assistance for PD therefore the expense falls on the teacher.”

“Because Career and Tech Ed is integrated into all of the other core areas, it can be a challenge to find PD that is specific enough for teachers at the secondary levels who are teaching these standards in a course-specific setting.”

“It will impose an additional expense for the district to send the entire CTE staff to MACTE every fall and a greater emphasis from administration to require all CTE staff to attend professional development training.”

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If we need certified CTE staff at the elementary level that opens up many challenges for professional development and new personnel."

"We currently have difficulty in finding many CTE related prof development for our middle and high school teachers beyond having to travel. The K-5 specific standards are new and will require us to find something grade-level appropriate."

"many opportunities but few quality opportunities"

Curriculum Development

Question	Yes	No	Maybe (if option)
Would the proposed standards, if adopted, require your district to substantially revise its current curriculum?	8 (14%)	24(41%)	26(45%)
Would the proposed standards impose a cost for curriculum development beyond what is required to implement the current standards?	22 (39%)	34 (61%)	

Summary if answered "yes"

"All our CTE teachers spend their time with students. We don't have a time built into a schedule to develop CTE resources

We need time to integrate into our content, instruction, and assessment"

"Staff would have to revise instructional periods to incorporate the standards into what they already do. Much of the early standards focus on exploration and writing or presenting. This could be incorporated into writing activities but would have to be aligned with reading and writing goals. During the school year, teachers are tied up with instruction and data analysis to alter instruction strategies. This leaves the summertime for teachers to work on initiatives. We have paid teachers to work the summer (versus them working for local businesses) when funds allow. The state would have to support teacher salaries to work on incorporating these standards with already existing standards and instructional plans with funding for summer work."

"Implementing a focus of CTE standards k-6 is where the largest portion of my survey thoughts are coming from. Implementing at this level will take significant changes, costs, and most importantly time."

"Though many of the proposed standards can be embedded into other disciplines, requisite time to support teachers in finding ways to embed them all will be necessary. Additionally, the addition of certain benchmarks specifically allocated to grade levels will require instructional time, which is very tight. Finally, teachers will need PD time to learn ways to integrate some of the age-specific benchmarks into their other disciplines."

"Teachers are singles in their departments. Curriculum development is on the teacher."

General Feedback

"It appears there is a shift to add K-6, which I think is good. However, we need to find a balance in what we are asking our teachers to do. We keep adding things to their day, but have limited number of hours in

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the day to get it all in. In addition, by adding things, other things have to either come off the plate or be served in smaller portions. This means scores will drop. There needs to be a tradeoff and realistic expectations for what we want our students to be proficient in. The students can't do everything, nor can my staff."

"The updated standards are greatly needed. However, educators will need access to professional development opportunities for these changes in standards."

"To implement a good school to workforce program and getting students out to have some job site experience it would be nice to have a program template and management system that can be run by one point person. That is also another issue, we need funding for all of this additional administrative work."

"Perhaps consideration should be given on developing mobile labs that could visit schools, especially small rural schools, to offer hands-on exploration and curriculum to meet these needs....at least for the elementary students. Teachers are already held accountable for reading, science and math, college and career readiness, and other subjects like suicide prevention, health screening, etc that takes away from instructional time for the things they get punished for when not having students who are proficient. To be proficient, you need adequate time to develop and master skills. When instructional time is taken away for all these other things, students will never master those skills. This is especially true of students who don't have the support at home, who have learning disabilities, or who struggle with reading or math."

"These things cost money. I think that it can be done, but it cannot be another unfunded mandate to work miracles. The Legislature needs to be on board, and we will need money to implement this and move our state forward."

"...Until CTE courses and progressions are standardized and students are learning the same topics at relatively the same time, it doesn't matter what your standards say it will still be a mess."

"Success of change will be determined by the support and attitude of which the change is passed down to the teacher required to implement the changes. Without funding and additional time to make these changes at the most basic level I believe the focus and goal of the changes to the CTE standards will be lost."

"In our school we have, at most, two licensed teachers therefore we have to be experts in all curriculum, which is unreasonable."

"OPI needs to consider a model that would train current elementary teachers with techniques that would include incorporating the proposed CTE content into their everyday teaching activities similar to what was done with the Indian Education for All model. As proposed, these CTE standards are really not achievable in a small school setting with limited personnel, limited space and limited time available."

"The state funding formula should be studied to determine how small schools could maintain efforts in the CTE areas."

"Overall the addition of the K-5 grade-level delineation is the biggest change. Middle and High School staff are wondering when career area standards will be developed and adopted. The current and these newly revised CTE standards are soft skills and not discipline specific which makes them difficult to

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implement and assess outside of a relevant work based learning experience like an internship or pre-apprenticeship.”

Course Codes

Montana course codes are a subset of the NCES (National Center for Education Statistics) Standard Codes. Along with the course code, a content description for each course is provided:

[Montana K-12 Course Codes and Description](#)