

Montana Board of Public Education Executive Summary

Date: November 15-17 2023

Presentation	Presentation for Educator Licensure Rule Revisions for ARM Title 10, Chapter 57.
Presenter(s)	Crystal Andrews and Julie Murgel
Position Title	Accreditation and Licensure Director and Chief Program Officer Office of Public Instruction
Overview	<p>This agenda item is presented for the BPE to consider recommended language for revision of the rules as aligned with 10.57.101(2).</p> <p>In 2022, the Board of Public Education conducted a comprehensive review of the entire Chapter 57 of Administrative Rule, Educator Licensure, which convenes every 5 years as required by ARM 10.57.101. The new rules were effective as of May 28, 2022. In administering the new rules over the last year, the OPI Educator Licensure Unit has identified recommended minor revisions. Additionally, new legislation from the 2023 session, specifically SB 373 (alternative teaching credential) and HB 458 (career coaches) require a review of definitions and Class 4: CTE licenses.</p>
Requested Decision(s)	Informational Item
Related Issue(s)	None
Recommendation(s)	None



Montana
Office of Public Instruction
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ARM Chapter 57 Educator Licensure Outline of Recommended Changes

In 2022, the Board of Public Education (BPE) conducted a comprehensive review of the entire Chapter 57 of Administrative Rule, Educator Licensure, which convenes every 5 years as required by ARM 10.57.101. The new rules were effective as of May 28, 2022. In administering the new rules over the last year, the OPI Educator Licensure Unit has identified recommended minor revisions and potential areas to increase licensure reciprocity and flexibility. New legislation from the 2023 session also informed areas to consider for revisions and updates. In September 2023, the BPE approved for ARM Chapter 57 to be reviewed and revised on particular rules, which are highlighted below. On October 31, 2023 the OPI hosted a workgroup to review and make recommendations on the set of identified rules. The attached document contains the recommendations that the work group generated.

Rule	Discussion of Revision- CLEAN UP
10.57.102(5)	Update the definition, of "approved preparation program" to reflect the two current educator preparation programs accreditors: the Council for the Accreditation of Educator Preparation (CAEP) and the Association for Advancing Quality in Educator Preparation (AAQEP).
10.57.102(14)	Update the definition, by replacing the term "regionally accredited" with "institutional accreditors" to reflect language changes from the U.S. Department of Education. Regional accreditors used to be limited to schools in specific regions but USED eliminated geographical boundaries for regional accreditors in 2020.
10.57.102(17)	Revise the definition of "unrestricted license" to include lifetime licenses.
10.57.414 10.57.415	Ensure the language of 10.57.414(c) and 10.57.415(d) for professional development requirements of principal's and superintendent's endorsements is similar.
10.57.421(1)	Add an endorsement for traffic education for a Class 4: CTE license to the list.
10.57.434	Streamline the requirements for a School Psychologist Endorsement for a Class 6 Specialist License.
10.57.437	Update the rule for a Class 8 Dual Credit Postsecondary Faculty License to reflect the removal of the Certification Standards and Practices Advisory Council (CSPAC).

Rule	Discussion of Revision- POLICY UPDATES
10.57.114	Specify the authorized signature required for Internships.
10.57.410(3)(a)	Expand eligibility for applicants who have earned a graduate degree from an accredited college or university but do not hold a bachelor's degree from a regionally accredited college or university.

10.57.412 10.57.425	Expand eligibility for applicants with middle school endorsements (4-8) to apply for K-8 and/or 5-12 content-specific endorsements.
10.57.414(1)(a) 10.57.415(1)(b)	Specify for a Class 3 Administrative License in which education graduate degrees are accepted.
10.57.415	Base the 3 years of teaching experience requirement on the years of experience regardless of type of license.
10.57.424	Add a pathway for candidates in the process of earning a bachelor's degree to obtain a Class 5 Provisional license.
10.57.424(4)	Allow the time frame for a Class 5 Provisional License to be extended based on evidence of extreme hardship similar to ARM 10.57.114(5) .
10.57.432	Remove the requirement to be within four courses of completing a program for a school counselor provisional license.
New	Specify foreign credential eligibility requirements.

Rule	Discussion of Revision- LEGISLATIVE UPDATES
10.57.102	Include a new definition for "alternative teaching credential," that aligns with SB 373 .
10.57.410	Expand licensure eligibility for candidates with an "alternative teaching credential" that aligns with SB 373 .

Board of Public Education Timeline Proposed Chapter 57 Rules

- BPE approves rulemaking timeline Sept. 14-15, 2023
- Proposal notice to BPE for consideration Nov 16-17, 2023
- BPE authorization to publish proposal notice, including public hearing date
Includes expert panel/work session (18) and notice (19) January 18-19, 2024
- Proposal notice to SOS for publication in MAR January 2024
- MAR publication of proposal notice
Public comment begins January 2024
- Public hearing date February 2024
- Final public comment deadline February 2024
- Adoption notice to BPE for consideration/respond to comments March 7-8, 2024
- BPE authorization to publish adoption notice May 9-10, 2024
- Adoption notice to SOS for publication in MAR May 2024
- MAR publication of adoption notice May 2024
- Effective date of rules July 1, 2024

ARM Chapter 57 Workgroup

Julie Murgel, Chief Program Officer	Office of Public Instruction
Crystal Andrews, Director of Accreditation and Licensure	Office of Public Instruction
Rob Watson, Executive Director	School Administrators of MT
John Melick, Director of Field Placement and Licensure	Montana State University
Kristi Steinberg, Director of Accreditation	University of Montana
Craig Crawford, Superintendent	Standford Public Schools
Ken Bigby, 6 th Grade Teacher	Harlem Public Schools
Dwight Nelson, Director of Traffic Education	Office of Public Instruction
Serena Wright, Title I and Homeless Specialist	Office of Public Instruction

Rule	Discussion of Revision- CLEAN UP	Current Language	Recommended Language	Notes
10.57.102(5)	Update the definition, of "approved preparation program" to reflect the two current educator preparation programs accreditors: the Council for the Accreditation of Educator Preparation (CAEP) and the Association for Advancing Quality in Educator Preparation (AAQEP).	<p>"Approved preparation program" means:</p> <p>(a) An educator preparation program accredited by the National Council for the Accreditation of Teacher Education (NCATE) or the Council for the Accreditation of Educator Preparation (CAEP) or the Montessori Accreditation Council for Teacher Education (MACTE). A MACTE educator preparation program is subject to the following restrictions:</p> <p>(i) Completion of a MACTE accredited program may only be used by an applicant for licensure who has also completed at least a bachelor's degree; and</p> <p>(ii) The resulting license granted to an applicant for licensure who has completed a MACTE accredited program shall be limited to early grades or middle grades licensure and only for the grade levels covered by the MACTE accredited program completed by the applicant; or</p> <p>(b) An educator preparation program at a regionally accredited college or university approved or accredited by a state board of education or state education agency; or</p> <p>(c) An educator preparation program approved by a state board of education or state education agency that leads to licensure in the state of preparation.</p>	<p>"Approved preparation program" means:</p> <p>(a) An educator preparation program accredited by the National Council for the Accreditation of Teacher Education (NCATE) or the Council for the Accreditation of Educator Preparation (CAEP), the Association for Advancing Quality in Educator Preparation (AAQEP), or the Montessori Accreditation Council for Teacher Education (MACTE). A MACTE educator preparation program is subject to the following restrictions:</p> <p>(i) Completion of a MACTE accredited program may only be used by an applicant for licensure who has also completed at least a bachelor's degree; and</p> <p>(ii) The resulting license granted to an applicant for licensure who has completed a MACTE accredited program shall be limited to early grades or middle grades licensure and only for the grade levels covered by the MACTE accredited program completed by the applicant; or</p> <p>(b) An educator preparation program at a regionally regionally institutionally accredited college or university approved or accredited by a state board of education or state education agency; or</p> <p>(c) An educator preparation program approved by a state board of education or state education agency that leads to licensure in the state of preparation.</p>	Options- Correct and name the accurate list or take names off entirely. Rationale- Keep names and be consistent and accurate. The group is in agreement with this change.
10.57.102(14)	Update the definition, by replacing the term "regionally accredited" with "institutional accreditors" to reflect language changes from the U.S. Department of Education. Regional accreditors used to be limited to schools in specific regions but USED eliminated geographical boundaries for regional accreditors in 2020.	<p>"Regionally accredited" means a college or university accredited by one of the following:</p> <p>(a) Higher Learning Commission;</p> <p>(b) Middle States Association of Schools and Colleges;</p> <p>(c) New England Association of Schools and Colleges;</p> <p>(d) Northwest Commission on Colleges and Universities;</p> <p>(e) Southern Association of Schools and Colleges; or</p> <p>(f) Western Association of Schools and Colleges.</p>	<p>"Regionally accredited Institutional Accreditors" means a college or university accredited by one of the following:</p> <p>(a) Higher Learning Commission;</p> <p>(b) Middle States Association of Schools and Colleges;</p> <p>(c) New England Association of Schools and Colleges;</p> <p>(d) Northwest Commission on Colleges and Universities;</p> <p>(e) Southern Association of Schools and Colleges; or</p> <p>(f) Western Association of Schools and Colleges.</p>	Make sure regionally accredited is not any place else in ARM- review all of Chapter 57 and update (Fix 10.57.410). The group is in agreement with this change.
10.57.102(17)	Revise the definition of "unrestricted license" to include lifetime licenses.	"Unrestricted license" means a current renewable license that is not an emergency or provisional license.	"Unrestricted license" means a current renewable license that is not an emergency or provisional license.	In ARM 10.57.410 The group is in agreement with this change.
10.57.414 10.57.415	Ensure the language of 10.57.414(c) and 10.57.415(d) for professional development requirements of principal's and superintendent's endorsements is similar.	<p>(c) completion of courses covering Montana School Finance, Montana School Law, and Montana Collective Bargaining and Employment Law. In order to qualify, such courses must have been provided either by:</p> <p>(i) an approved professional development provider pursuant to ARM 10.57.216; or</p> <p>(ii) an approved school administrator preparation program;</p> <p>(d) completion of three semester credits of college courses in school law, including special education law;</p>	<p>(c) completion of courses coursework covering Montana School Finance, Montana School Law, and Montana Collective Bargaining and Employment Law. In order to qualify, such coursework coursework must have been provided either by:</p> <p>(i) an approved professional development provider pursuant to ARM 10.57.216; or</p> <p>(ii) an approved school administrator preparation program;</p> <p>(d) completion of three semester credits of a college course three semester credits of a college course in school law, including special education law;</p>	Discussion around keeping college in (d) and/or the number of credits. Stated not to minimize the importance of law in schools today. Landed on language presented and the group is in agreement with this change.
10.57.412	Remove the endorsement school counseling K-12 for a Class 1 and 2 licenses.	(2) Areas approved for endorsement on Class 1 and 2 licenses include the following: agriculture, art K-12, biology, business education, chemistry, communication, computer science, early childhood (P-3), earth science, economics, elementary education (K-8), English, English as a second language K-12, family and consumer sciences, geography, health, health and physical education K-12, history, industrial trades and technology education, journalism, library K-12, mathematics, middle grades (4-8), music K-12, physical education K-12, physics, political science, psychology, reading K-12, school counseling K-12, science (broadfield), social studies (broadfield), sociology, special education P-12, special education P-12 hearing impairment, special education P-12 vision impairment, theater, traffic education, and world languages K-12.	(2) Areas approved for endorsement on Class 1 and 2 licenses include the following: agriculture, art K-12, biology, business education, chemistry, communication, computer science, early childhood (P-3), earth science, economics, elementary education (K-8), English, English as a second language K-12, family and consumer sciences, geography, health, health and physical education K-12, history, industrial trades and technology education, journalism, library K-12, mathematics, middle grades (4-8), music K-12, physical education K-12, physics, political science, psychology, reading K-12, school counseling K-12 , science (broadfield), social studies (broadfield), sociology, special education P-12, special education P-12 hearing impairment, theater, traffic education, and world languages K-12.	EPF's expressed that their programs are at a master's level and this would not impact licensure. For any that may have let their license lapse for a Class 1 or 2 in school counseling, their qualifications would be reviewed to see if they meet a Class 6. The group is in agreement with this change.
10.57.421(1)	Add an endorsement for traffic education for a Class 4: CTE license to the list.	(1) Recognized occupations eligible for a Class 4 license shall be evaluated on an annual basis by the Superintendent of Public Instruction. Appropriate career and technical education areas acceptable for endorsement on the Class 4 license include but are not limited to the following: agriculture business, agriculture mechanics, auto body, automotive technology, aviation, building maintenance, building trades, business marketing, computer coding, computer information systems, culinary arts, diesel mechanics, drafting, electronics, emergency medical technician (EMT), engineering, fire and disaster services, graphic arts, health science education, heavy equipment operations, horticulture, industrial mechanics, livestock production, machining, metals, plant and soil sciences, Reserve Officer Training Corps (ROTC) instruction, small engines, stagecraft, teacher education, videography, and welding.	(1) Recognized occupations eligible for a Class 4 license shall be evaluated on an annual basis by the Superintendent of Public Instruction. Appropriate career and technical education areas acceptable for endorsement on the Class 4 license include but are not limited to the following: agriculture business, agriculture mechanics, auto body, automotive technology, aviation, building maintenance, building trades, business marketing, computer coding, computer information systems, culinary arts, diesel mechanics, drafting, electronics, emergency medical technician (EMT), engineering, fire and disaster services, graphic arts, health science education, heavy equipment operations, horticulture, industrial mechanics, livestock production, machining, metals, plant and soil sciences, Reserve Officer Training Corps (ROTC) instruction, small engines, stagecraft, teacher education, traffic education , videography, and welding. (5) For traffic education, (i) To qualify for a traffic education endorsement the applicant must meet the requirements of ARM 10.13.310, or (ii) A Class 4A, 4B, or 4C career and technical education license may be approved to teach traffic education if the license meets the requirements of ARM 10.13.310.	10.13.310 Traffic Education Teachers; already has language for Class 4, it needs to be added to Ch. 57 for consistency. The group is in agreement with this change.
10.57.434	Streamline the requirements for a School Psychologist Endorsement for a Class 6 Specialist License.	(1) To obtain a Class 6 specialist license with a school psychologist endorsement an applicant must provide verification of: <p>(a) current credentials as a nationally certified school psychologist (NCSP) from the National Association of School Psychologists (NASP); or</p> <p>(b) completion of a specialist level degree from a NASP accredited school psychologist program which included a 1200-hour internship, of which 600 hours were in a P-12 school setting; or</p> <p>(c) for those applicants who did not earn at least a specialist level school psychology degree from a NASP accredited program:</p> <p>(i) a master's degree or higher in school psychology or a related field from a regionally accredited college or university; and</p> <p>(ii) recommendation from a NASP accredited specialist program defined in ARM 10.57.102, attesting to the applicant's qualifications being equivalent to NASP training standards, which included a 1200-hour internship experience of which 600 hours were in a P-12 school setting.</p>	(1) To obtain a Class 6 specialist license with a school psychologist endorsement an applicant must provide verification of one of the following : <p>(a) current credentials as a nationally certified school psychologist (NCSP) from the National Association of School Psychologists (NASP); or</p> <p>(b) completion of a specialist level degree from a NASP-accredited school psychologist program which included a 1200-hour internship, of which 600 hours were in a P-12 school setting; or</p> <p>(c) for those applicants who did not earn at least a specialist level school psychology degree from a NASP-accredited program:</p> <p>(i) a master's degree or higher in school psychology or a related field from a regionally institutionally accredited college or university; and</p> <p>(ii) recommendation from a NASP-accredited an approved specialist program defined in ARM 10.57.102, attesting to the applicant's qualifications being equivalent to NASP training standards, which included a 1200-hour internship experience of which an internship in a P-12 school setting, of 600 hours, were in a P-12 school setting.</p>	The most problematic area is in (1)(c)(ii). The group is in agreement with this change.
10.57.102	Update definition for accredited specialist program	(2) "Accredited specialist program" means: <p>(a) for school psychologists, a program accredited by the National Association of School Psychologists (NASP);</p>	(2) "Accredited specialist program" means: <p>(a) for school psychologists, a program for the preparation of specialists approved or accredited by: (i) the National Association of School Psychologists (NASP); and or (ii) a state board of public education or a state agency.</p>	Needed to updated definition to match changes in 10.57.434 aligned to match the definition for school counselor. The group is in agreement with this change.

10.57.437	Update the rule for a Class 8 Dual Credit Postsecondary Faculty License to reflect the removal of the Certification Standards and Practices Advisory Council (CSPAC).	(4) Class 8 dual credit license applications will be reviewed by the Certification Standards and Practices Advisory Council for recommendation regarding issuance of the license by the Superintendent of Public Instruction. Denial of an application for licensure shall be appealable to the Board of Public Education pursuant to ARM 10.57.607.	(4) Class 8 dual credit license applications will be reviewed by the Certification Standards and Practices Advisory Council for recommendation regarding issuance of the license by the Superintendent of Public Instruction. Denial of an application for licensure shall be appealable to the Board of Public Education pursuant to ARM 10.57.607.	Remove 4 because any license is reviewed by the OPI and the language in 10.57.607 contains the appeal process for all licenses. This language is redundant. Change numbering for (5) and (6) to (4) and (5). Update (3)(a) and remove regionally accredited. The group is in agreement with this change.
10.57.102	Transfer the definition for internship from 10.55.602 to 10.57.102 to add Class 6			An EPP brought up that the definition was not transferred from Chapter 55 to 57 for internship. This will need to be discussed with the BPE on what to do.

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Rule	Discussion of Revision- POLICY UPDATES	Current Language	Recommended Language	Notes
10.57.114	Specify the authorized signature required for Internships.	(3) If entering into internship agreements, the accredited Montana educator preparation program must report each enrolled intern to the Superintendent of Public Instruction no later than November 15 of each year.	(3) If entering into internship agreements; (a) the accredited Montana educator preparation program must report each enrolled intern to the Superintendent of Public Instruction no later than November 15 of each year; and (b) the district must approve internship applications; (i) Superintendent applications must be approved by the district board chair or county superintendent. (ii) All other internship applications must be approved by the district superintendent.	The group is in agreement with this change.
10.57.410(3)(a)	Expand eligibility for applicants who have earned a graduate degree from an accredited college or university but do not hold a bachelor's degree from a regionally accredited college or university.	To obtain a Class 2 standard teacher's license an applicant must submit verification of all of the following: (a) a bachelor's degree from a regionally accredited college or university;	To obtain a Class 2 standard teacher's license an applicant must submit verification of all of the following: (a) a bachelor's or master's degree from an regionally-institutionally accredited college or university;	The group is in agreement with this change.
10.57.412 10.57.425	Expand eligibility for applicants with middle school endorsements (4-8) to apply for K-8 and/or 5-12 content-specific endorsements.	(5) To obtain an early childhood (P-3), elementary (K-8), middle grades (4-8), secondary (5-12 content-specific), K-12, or P-12 (special education) endorsement, an applicant must provide verification of completion of an approved educator preparation program at the grade level(s) identified by the program, including supervised teaching experience or a waiver of this requirement if the applicant has previously had supervised teaching experience.	(5) To obtain an early childhood (P-3), elementary (K-8), middle grades (4-8 content-specific), secondary (5-12 content-specific), K-12, or P-12 (special education) endorsement, an applicant must provide verification of completion of an approved educator preparation program at the grade level(s) identified by the program, including supervised teaching experience or a waiver of this requirement if the applicant has previously had supervised teaching experience.	Concerns about middle grades getting K-8 or 5-12 content specific. The group is in agreement with this change.
10.57.414(1)(a)	Specify for a Class 3 Administrative License in which education graduate degrees are accepted.	(a) an education specialist, master's, or doctoral degree from a regionally accredited college or university in education or education leadership;	(a) an education specialist, master's, or doctoral degree from an regionally institutionally accredited college or university in education leadership or a P-12 education related area of study;	Make sure that principal and superintendent endorsements mirror each other-- accept education specialist, master's or doctoral degree from an institutionally accredited college or university in education or education leadership. The group is in agreement with this change.
10.57.415 (b)	Base the 3 years of teaching experience requirement on the years of experience regardless of type of license. Specify for a Class 3 Administrative License in which education graduate degrees are accepted.	(a) a minimum of three years of teaching or school counseling experience with a standard, unrestricted license at the level of the requested endorsement; (b) a master's degree from a regionally accredited college or university in education or education leadership;	(a) a minimum of three years of teaching or school counseling experience with a standard, unrestricted license as defined in 10.57.102(19) at the level of the requested endorsement; (b) an education specialist or master's degree from an regionally-institutionally accredited college or university in education or education leadership ;	The group is in agreement with this change.
10.57.424	Add a pathway for candidates in the process of earning a bachelor's degree to obtain a Class 5 Provisional license.			Defer and study further. No proposed solution at this time.
10.57.424(4)	Allow the time frame for a Class 5 Provisional License to be extended based on evidence of extreme hardship similar to ARM 10.57.114(5).	(7) A Class 5A, 5B, or 5C provisional licensee is not eligible for a Board of Public Education approved internship program in the same endorsement area subsequent to the Class 5A, 5B, or 5C licensure expiration date.	(7) A Class 5A, 5B, or 5C provisional licensee is not eligible for a Board of Public Education approved internship program in the same endorsement area subsequent to the Class 5A, 5B, or 5C licensure expiration date; and (8) Extension may be granted to a Class 5B or 5C provisional license at the discretion of the Superintendent of Public Instruction as authorized in ARM 10.57.109. Requests for extension must be submitted by the licensee and supported by the accredited educator preparation program. A request for extension must demonstrate evidence of extreme hardship or other circumstances beyond the control of the licensee which prevented timely completion of the agreed upon plan of study.	Do we have a definition for extreme hardship? The group is in agreement with this change.

10.57.432	Remove the requirement, to be within four courses of completing a program, for a school counselor provisional license.	<p>(1) To obtain a Class 5 provisional license with a specialist endorsement in school psychology, an applicant must provide:</p> <p>(a) verification of a master's degree or greater in school psychology or related field from a regionally accredited college or university; and</p> <p>(b) for those applicants who have not completed an approved specialist preparation program, verification from an approved specialist program, of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.434.</p> <p>(2) To obtain a Class 5 provisional license with a specialist endorsement in school counseling an applicant must provide:</p> <p>(a) verification of a bachelor's degree; and</p> <p>(b) verification from the approved specialist program, of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.435.</p>	<p>(1) To obtain a Class 5 provisional license with a specialist endorsement in school psychology, an applicant must provide:</p> <p>(a) verification of a master's degree or greater in school psychology or related field from an <u>regionally institutionally</u> accredited college or university; <u>and or</u></p> <p>(b) for those applicants who have not completed an approved specialist preparation program, <u>verification from an approved specialist program, of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.434. the applicant must provide verification from the approved specialist program of current enrollment and must sign and file with the Superintendent of Public Instruction a plan of professional intent and evidence of enrollment leading, within three years of the date of validity of the provisional license, to an appropriately endorsed Class 6 license as provided in ARM 10.57.434.</u></p> <p>(5) A Class 5C provisional license is valid for a term of three years, is not renewable, and may not be reinstated.</p> <p>(2) To obtain a Class 5 provisional license with a specialist endorsement in school counseling an applicant must provide:</p> <p>(a) verification of a bachelor's degree; and</p> <p>(b) <u>verification from the approved specialist program, of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.435. the applicant must provide verification from the approved specialist program of current enrollment and must sign and file with the Superintendent of Public Instruction a plan of professional intent leading, within three years of the date of validity of the provisional license, to an appropriately endorsed Class 6 license as provided in ARM 10.57.435.</u></p>	The group is in agreement with this change
10.57.410	Specify foreign credential eligibility requirements.	<p>(3) To obtain a Class 2 standard teacher's license an applicant must submit verification of all of the following:</p> <p>(a) a bachelor's degree from a regionally accredited college or university;</p>	<p>(3) To obtain a Class 2 standard teacher's license an applicant must submit verification of all of the following:</p> <p>(a) a bachelor's or <u>master's degree from an regionally institutionally</u> accredited college or university; <u>or a completed evaluation of foreign transcripts that demonstrates equivalency to a bachelor's degree through a National Association of Credential Evaluation Services (NACES) agency.</u></p>	The group is in agreement with this change.

Rule	Discussion of Revision- LEG. UPDATES	Recommended Language	Notes
10.57.102	Include a new definition for “alternative teaching credential,” that aligns with SB 373.	BPE consider a process for the approval for alternative programs rather than accreditations within ARM 10.58	Defer and study further. No proposed solution at this time.
10.57.410	Expand licensure eligibility for candidates with an “alternative teaching credential” that aligns with SB 373.	BPE consider a process for the approval for alternative programs rather than accreditations within ARM 10.58	Defer and study further. No proposed solution at this time.

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