
MONTANA STRATEGIC WAIVER PUBLIC COMMENT SUMMARY REPORT JAN – FEB 2021

Prepared by the Office of Public Instruction



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Executive Summary

This “Public Comment Summary Report” is prepared to address the requirements under Section 8401 of the Elementary Secondary Education Act (ESEA) which grants the Secretary of Education the authority to waive certain statutory and regulatory requirements for the ESEA programs. The ESEA outlines the information that the State must include when it submits waiver requests to the Secretary of Education (ESEA section 8401(b)(1)) and the manner in which States and districts seeking waivers must provide notice and opportunity to comment to the public and affected agencies (ESEA section 8401(b)(3)).

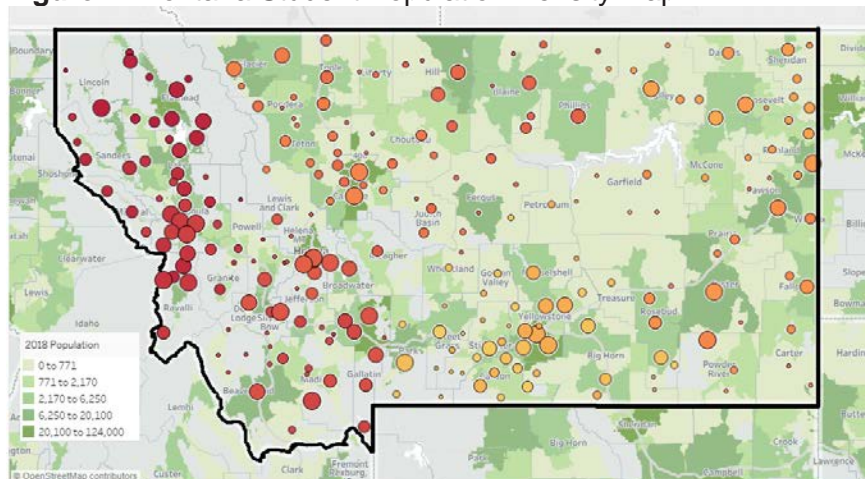
Methods

The OPI initiated the Montana Strategic Waiver Process for the purposes of conducting meaningful and timely consultation with diverse stakeholders and providing adequate notice and opportunity to comment on the testing, accountability, and reporting waivers. The Montana Strategic Waiver Process utilized two primary survey tools, that is, “Montana Strategic Waiver Webinar Series” hereinafter referred to as the Menti Survey and the “Montana Strategic Waiver Public Comment Survey” hereinafter referred to as the Google Form. These were considered as structured surveys to collect comments from the public. The public was also welcomed to e-mail the OPI at ESSAInput@mt.gov or provide comments at public meetings. All methods used in this public comment process were conducted in a manner that the OPI customarily provides similar notices and information to the public.

General Montana Context

Montana is a geographically vast and rural state with a relatively low population. Statewide, Montana has very low student diversity percentages with some geographic areas having more diversity than others. In Montana, about 150,000 students are enrolled in the K-12 public school system. Montana has localized areas with higher overall population densities that contribute largely to the overall K-12 public schools (see the [Facts About Montana Education 2020](#)). For instance, the schools in these areas make up roughly 30% of all schools in Montana but the students in these schools make up over 85% of the K-12 public school student population. These large urban areas are commonly referred to as the “Big 7” (i.e., Billings, Bozeman, Butte, Great Falls, Helena, Kalispell, and Missoula). The “Big 7” schools are class AA schools described in more detail below. **Figure 1** illustrates these population density pockets around the areas of Billings, Bozeman, Butte, Great Falls, Helena, Kalispell, and Missoula and also centered around Interstate 90 and Interstate 15.

Figure 1. Montana Student Population Density Map



School System Facts

For the 2020-2021 school year, there are 316 accredited school systems. Of these accredited school systems, there are 10 nonpublic school systems. The information for **Table 1** was generated from the OPI state school and student databases for the 2020-2021 school year. There are four state-funded schools included in the accredited public values.

Table 1. Number of accredited non-public and public-school districts

	Accredited Non-Public	Accredited Public	Total Schools Systems
School System Total	10	306	316

Note: Four state-funded organizational types are included in the accredited nonpublic school system counts.

School District Characteristics

There are 56 counties in Montana. Across the state, roughly 10,500 teachers are employed and roughly 480 guidance counselors. In Montana, educators primarily fill the role of test proctor (or Test Administrator) and guidance counselors primarily are designated as building level or system level Test Coordinators. It is determined at the district level what staff will serve in these roles; however, the OPI provides guidance on this within the [MontCAS Test Security Manual](#). The data for the number of teachers and counselors was obtained from the Common Core of Data published on the [EISi Table Generator](#) for the 2018-2019 school year.

School Details

For the purposes of this summary report, there are 836 accredited schools in Montana. All accredited schools are required to participate in statewide testing under Montana Code Annotated (MCA) and the Administrative Rules of Montana (ARM). The information for **Table 2** and **Table 3** were generated from the OPI school and student databases. There are two elementary and two high school state-funded programs included in **Table 2**.

Table 2. Number of Public Schools by grade span

Grade Type	School Year 2020-2021
Elem	436
MS	217
HS	171
Total Schools	824

Table 3. Number of Accredited Nonpublic Schools by grade span

Grade Type	School Year 2020-2021
Elem	1
MS	1
HS	10
Total Schools	12

School Size and Geographic Representation

Independent K-8 schools in this table were aggregated up to the feeder high school to designate its Montana High School Association (MHSA) sports class assignment which is a common community size reporting category in the state based on student enrollments as opposed to urban-centric locale codes. The information for **Table 4** was generated from the OPI's school directory database and used to compare against the survey results.

Table 4. School MHSA Class Counts

Definition	MHSA Category	Non-Public Schools	Public Schools	Total Schools
Class AA -- 779 students or more	AA		180	180
Class A -- 307-778 students	A	2	110	112
Class B -- 108-306 students	B	1	173	174
Class C -- 1-107 students	C	9	357	366
No information available	Unknown		4	4
Total Number of Schools		14	822	836

Source: OPI state school and student databases for the 2020-2021 school year.

Urban-Centric Locale Codes Compared to MHSA

In Montana, the relevant federal urban-centric locale codes are 12-City: Mid-size, 13-City: Small, 22-Suburb: Mid-size, 23-Suburb: Small, 31-Town: Fringe, 33-Town: Remote, 41-Rural: Fringe, 42-Rural: Distant, and 43-Rural: Remote. **Table 5** illustrates the comparisons between the two classification systems to describe Montana's local education agencies (LEAs) also known as school districts. These two classification systems are not directly comparable as the MHSA is the system used for sports class assignments based on student enrollment and the locale code is based on location. However, the MHSA is widely used by the public to indicate community size, so it was selected for the purposes of the OPI's public comment surveys.

Table 5. Urban-Centric Local Codes Compared to MHSA

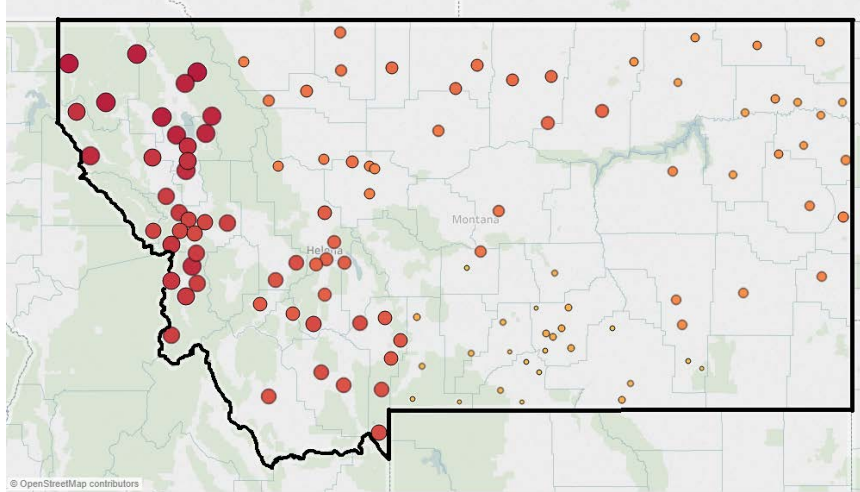
Local Code Category	Percent of LEAs	MHSA Class	Percent of LEAs
City (12-13)	3%	AA	13%
Suburb (22-23)	1%	A	14%
Town (31-33)	18%	B	26%
Rural (41-43)	78%	C	45%
		None	1%

Note: values may not sum to 100 percent due to rounding rules.

Combined Google Form and Menti Survey Map

In Montana, there are 361 unique zip codes. The combined survey results during the 40 days of public comment showed that 32% (N=117) of the geographic locations were represented by this survey process. The geographic locations with the highest number of respondents included Helena at 7% (N=25), Kalispell at 6% (N=20), Great Falls at 5% (N=17), Columbia Falls at 4% (N=15), and Bozeman at 3% (N=12). The maps presented in this summary report were prepared using Tableau.

Figure 2. Combined Survey Tableau Map (N=359)



Public Comment Summary – Google Form

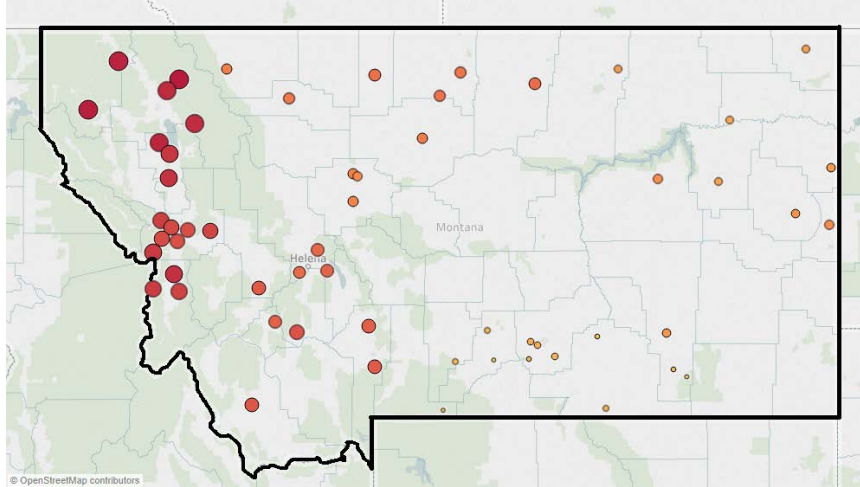
The Montana Strategic Waiver Process used two primary survey tools, that is, the Menti Surveys and the Google Form. Combined these two survey types represent 359 voices as shown in **Figure 2**. We recognize that these two surveys are not fully representative of the total population of Montana’s potential affected stakeholders (see the [Strategic Waiver Public Comment Outreach](#)); however, the OPI did complete exhaustive opportunities for comment and find the statewide geographic and urban-rural representation complete for these purposes (see [December 23 2020](#) and [January 13 2021](#)).

The Google Form was open to the public from December 23, 2020, to February 1, 2021 (40 days). In total, the OPI received 118 responses in this survey where only one response was submitted by the same individual twice. In total, the OPI organized 12 distinct zoom webinars of which five were used to gather comments with the Menti Survey to provide the OPI with real-time public participation and comment. The webinar series concluded on January 28 at the ASSIST Conference with 155 voices captured.

Google Form Map

Figure 3 pictured below shows the geographic regions across the state of Montana that participated in this public comment survey. The size of the bubbles corresponds with the number of individual responses reported for that unique zip code.

Figure 3. Public Comment Survey Tableau Map (N=118)



Respondent Demographic Details

There were 57 unique local education agencies reported including “other”. Similar to the geographic information shown by zip codes, the Montana Association of School Superintendents (MASS) regions with the highest public comment representation include 4 Rivers at 22.8% (N=13), North West at 15.8% (N=9) and West at 15.8% (N=9). The representation for the remaining six MASS regions include South Central at 10.5% (N=6), Hi Line at 8.8% (N=5), North East at 8.8% (N=5), South East at 8.8% (N=5), North Central at 7.0% (N=4), and Other at 1.8% (N=1). Prairie View Special Services is listed under the “other” categorization and treated as one location, but note that it is a full-service special education cooperative that serves thirteen-member school districts, in the counties of Dawson, McCone, Prairie, Richland and Wibaux.

Table 6. List of Unique Organizations by Geographic MASS Region

MASS	SS	Organization Name	Count
4 Rivers	0514	Anderson Elementary	1
4 Rivers	0516	Belgrade Public Schools	1
4 Rivers	0501	Bozeman Public Schools	1
4 Rivers	0902	Butte Public Schools	4
4 Rivers	0721	Cooke City Elementary	2
4 Rivers	0805	Deer Lodge Elementary	1
4 Rivers	0199	Dillon Elementary	2
4 Rivers	0615	East Helena Public Schools	2
4 Rivers	0611	Helena Public Schools	5
4 Rivers	0511	Monforton Elementary	1
4 Rivers	1068	Shields Valley Pub Schls	1
4 Rivers	0585	Whitehall Public Schools	1
4 Rivers	0201	Wise River Elementary	1
Hi Line	0564	Box Elder Public Schools	5
Hi Line	1073	Chester-Joplin-Inverness PS	1

Hi Line	0222	Harlem Public Schools	1
Hi Line	0565	Havre Public Schools	1
Hi Line	0756	Saco Public Schools	1
North	0545	Browning Public Schools	2
North	0307	Fort Benton Public Schls	1
North	0278	Great Falls Public Schls	6
North	0775	Valier Public Schools	1
North	0660	Circle Public Schools	1
North	0856	Frontier Elementary	2
North	0891	Plentywood K-12 Schools	2
North	0837	Rau Elementary	1
North	0831	Sidney Public Schools	1
North	0467	Columbia Falls Pub Schls	13
North	0645	Eureka Public Schools	1
North	0474	Helena Flats Elementary	1
North	0466	Kalispell Public Schools	7
North	0466	Kalispell Public Schools	1
North	0640	Libby K-12 Schools	1
North	1046	Upper West Shore Elem	2
North	1046	Upper West Shore Elem	1
North	1065	West Glacier Elementary	1
South	1007	Billings Public Schools	2
South	0909	Columbus Public Schools	3
South	0216	Hardin Public Schools	2
South	1011	Laurel Public Schools	2
South	0917	Rapelje Public Schools	1
South	0910	Reed Point Public Schools	1
South	0872	Ashland Elementary	2
South	0870	Colstrip Public Schools	2
South	0523	Jordan Public Schools	1
South	0867	Lame Deer Public Schools	1
South	0997	Wibaux K-12 Schools	1
West	0698	Bonner Elementary	7
West	0822	Corvallis K-12 Schools	1
West	0700	DeSmet Elementary	1
West	0706	Frenchtown K-12 Schools	3
West	0824	Hamilton K-12 Schools	1
West	0694	Hellgate Elementary	1
West	0696	Lolo Elementary	1
West	0692	Missoula Co Public Schls	2
West	0823	Stevensville Public Schls	1
		Other	5
		Total	118

The Google Form allowed districts to report “K-8 or One Room Schoolhouse” and did not classify them under the high school these locations would feed up to.

Table 7. Google Form Percent Reported by District Size

Category	Class AA	Class A	Class B	Class C	K-8 Independent	Other
Count	31	34	9	20	22	2
Percent	26%	29%	8%	17%	19%	2%

Note: These values may not sum to 100 percent due to rounding rules.

Table 8. Primary Role in Education from Google Form and Menti

Row Labels	Google Form Count	Menti Count
Administrator	31	63
Counselor	5	39
Curriculum Specialist	2	7
Indian Education Specialist or Tribal Representative	1	
Instructional Coach	4	
IT Specialist	1	10
OPI Staff		8
Parent	7	7
Public Taxpayer		1
School Psychologist	1	
System Test Coordinator (STC)	9	32
District Teacher Union President	1	
Teacher, Elementary	42	19
Teacher, High School	2	
Teacher, Middle School	3	
Teacher, Special Education	7	
Teacher: Middle School	1	
Test Contractor		
System Test Coordinator	1	4
Other		25
Grand Total	118	215

In the Google Form, respondents were asked to review the [Public Comment Outreach List](#) and identify if there were any affected stakeholder group(s) not identified. Of the 118 respondents, 18% (N=21) indicated that one or more stakeholder groups were not listed. To address this concern, on January 15, the OPI reviewed its 73 public comment responses where 11% (N=13) were identified as missing. This list included student council, retired teachers, the teacher union, homeless coordinators or liaisons, English language learner representatives, parent associations, and the general public. Given this feedback, the OPI reached out to key educational groups and state leaders for support with providing public notice of these strategic waiver activities within their respective organizations and listservs. After this date, only eight respondents indicated one or more groups were missing but only one named the missing group. On January 22, the MT Parent Training Center: Montana Empowerment Center, Inc. was identified as a missing stakeholder group or organization. However, the OPI did not notify this group directly after it was reported.

Figure 4. Support of the strategic waiver for testing

Do you support the strategic waiver for state testing under ESEA-ESSA Section 1111b)(2)? (N=116)

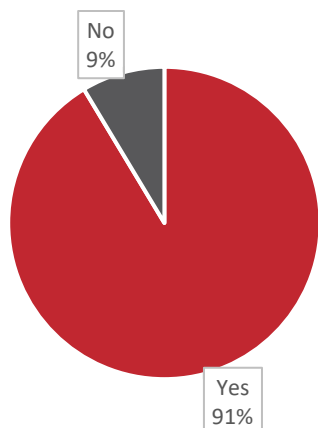


Table 9. Stakeholder Role and Support for the Strategic Waivers

Role	No	Yes	Total	Percent Yes	Percent No
School or District Administrator	3	30	33	91%	9%
Other School or District Leader (counselor, curriculum specialist, instructional coach, IT specialist, school psychologist, Indian Education Specialist)	1	13	14	93%	7%
System Test Coordinator (STC)	0	9	9	100%	0%
Teacher (Elementary, High School, Middle School, Special Education)	2	51	53	96%	4%
Parent	4	3	7	43%	57%
Total	10	106	116	91%	9%

More than 90% of respondents support the waiver. The only group that is more likely to indicate that they do not support the waiver is parents. There was a limited sample of parent stakeholders who participated in this survey (n=7). However, of those that did participate 57% indicated that they are not in favor of the waiver.

All individuals who indicated that they do not support the waiver shared a similar concern - if we do not test, we will not have the data we need to understand either a) the remediation and support individual students need, or b) what methods of instruction were most effective within the context of the pandemic.

Reasons for Support of Waivers

If you answered yes above, how would students benefit if the Department and Board granted the state testing strategic waivers?

One hundred and four individuals provided a response to this open-ended question. The general concerns expressed by these respondents are:

- **Loss of instructional time due to testing** - many respondents focused on the idea that they support the waiver due to the opportunity a testing waiver provides to increase the number of hours available this spring for instruction. These individuals generally expressed

concern that students have lost instructional time due to COVID-19, both through school closures and transitions to remote learning, and would like the focus this spring to be on instructional time.

- **Reduction of stress and trauma for students** - many respondents feel that the primary focus this spring should be on student social emotional learning and needs. Many students experience anxiety around tests in general, and the concern of many stakeholders is that administering summative assessments this spring would add unnecessary anxiety and trauma for students.
- **Validity of results** - between the loss of instructional time over the past 12-month period, and the patterns inherent in the distribution of students across in-person, hybrid, and remote instructional settings any data collected from spring administrations of summative assessments will not be a representative sample and therefore will not be generalizable. Stakeholders feel if the data collected will not be valuable that it is not in the best interest of students to administer the assessments.
- **Reality of public perception** - the vast majority of respondents feel that schools and districts will be unable to meet the 95% participation threshold given the number of students currently in a remote learning environment. While it is possible for schools to invite students to come to the school in person to test, it is unlikely that they will be able to meet the standard participation criteria this year.

The OPI believes that the specific context of our waiver request honors all concerns expressed by individuals both for and against the waiver. Our waiver request is designed to promote flexibility. Schools that can safely test may do so, and all schools are still expected to make reasonable efforts to test. However, if they are unable to assess 95% of their students locally, or if at a state level there is not representative participation distribution, the strategic waiver allows us the flexibility at the state, district, and individual level that our stakeholders are looking for while still allowing for testing where possible.

Monitoring the effectiveness of instruction

If the Department and Board grant the state testing strategic waivers, how will schools monitor and evaluate the effectiveness of instruction?

Of the 110 responses to this question, nearly all stakeholders focused on the availability of student level data from district or local identified data sources. These data sources include (but are not limited to): interim assessments, MAP testing, Dibels, curriculum/textbook produced assessments, and collaboratively designed district assessments. Respondents advocated for local processes for monitoring data from assessments to drive instructional shifts. Respondents further maintained that local data sources are more valuable for monitoring effectiveness of instruction at the classroom level and should be prioritized this year as they work to support students to overcome learning gaps due to lost instructional time.

Some participants addressed other methods of evaluating effectiveness of instruction such as walk-throughs and peer-to-peer observations. While these methods of evaluation may be impacted by COVID-19, they are not impacted by the waiver.

Providing progress information to parents/guardians

If the Department and Board grant the state testing strategic waivers, how will schools provide student achievement and progress information to families?

This open-ended item received a response from 110 respondents. These individuals overwhelmingly shared that their current practices for communicating with families about student achievement and progress do not rely on state level summative assessments. Schools are using a variety of methods to share locally generated data (e.g., parent conferences, mailing score reports and report cards home, email communication, and phone calls to parents), and plan to continue these local practices with data from local assessments such as NWEA's MAP, Star Reading and Math, state provided interim assessments, Prodigy, EdReady, iStation, and district-developed assessments. Data will also continue to be shared in IEP and 504 meetings in relevant cases.

Ensuring equal access to all students

What ideas do you have for ensuring all students have equal access to high-quality education during COVID-19?

The 94 responses to this open-ended question, the comments show that many innovative things are happening in Montana to support student learning during the pandemic. Some individuals recognize the need to retain at least some amount of remote or hybrid instruction with a focus on access to technology for students and professional development for teachers. Responses indicate that professional development for teachers should address both best practice for instruction in remote and hybrid environments, and specific applications of technology. Other individuals are more focused on ways to move towards a higher share of in-person instruction. Some ideas for this include reducing class sizes, prioritize in person opportunities for our highest need students, and office hours or small group sessions in person outside of class time.

Some respondents acknowledged that COVID-19 has impacted daily life beyond the school building and advocated that consideration be given for family schedules that may be shifted due to COVID-19 and may require instruction be provided at different times of day, especially when the instruction is remote.

Figure 5. Review of the OPI Strategic Waiver Timeline

Review the OPI Strategic Waiver Timeline document. Do you have any concerns about the 2020-2021 Strategic Waiver Timeline? (N=111)

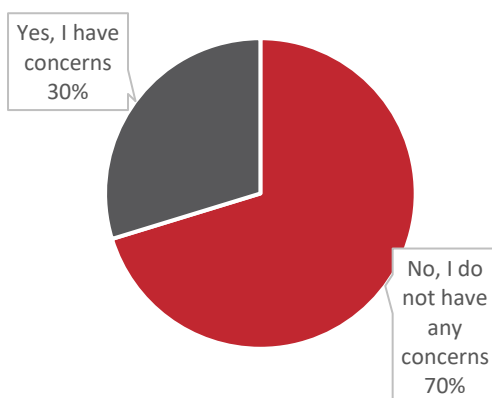


Table 10. Stakeholder Role and Concerns with the Timeline

Role Category	No, I Do not have any concerns	Yes, I have concerns	Total	Percent Yes	Percent No
School or District Administrator	19	14	33	42%	58%
Other School or District Leader (counselor, curriculum specialist, instructional coach, IT specialist, school psychologist, Indian Education Specialist)	10	3	13	23%	77%
System Test Coordinator (STC)	6	3	9	33%	67%
Teacher (Elementary, High School, Middle School, Special Education)	39	10	49	20%	80%
Parent	4	3	7	43%	57%
Total	78	33	111	30%	70%

Timeline Concerns

If you indicated that you have concerns in the question above, please share these:

The 36 respondents to this question overwhelmingly commented on the fact that we may not have a response to the waiver until after assessment windows start, and potentially after the school year ends for some schools. Respondents noted that the time and resources necessary for schools to administer assessments is significant with undue stress on students preparing for and launching a testing window that may or may not be necessary.

Figure 6. Concerns About Funding Loss

Do you anticipate any loss of funding due to no achievement scores for the spring 2021 administration (2020-2021 school year)? (N=103)

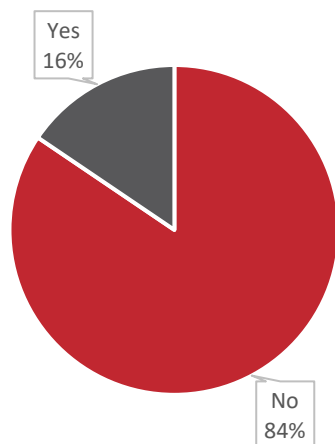


Table 11. Stakeholder Role and Concerns with Funding

Role Category	No	Yes	Total	Percent Yes	Percent No
School or District Administrator	28	5	33	15%	85%
Other School or District Leader (counselor, curriculum specialist, instructional coach, IT specialist, school psychologist, Indian Education Specialist)	10	3	13	23%	77%
System Test Coordinator (STC)	7	2	9	22%	78%
Teacher (Elementary, High School, Middle School, Special Education)	38	5	43	12%	88%
Parent	4	1	5	20%	80%
Total	87	16	103	16%	84%

Concerns About Funding Loss

If you answered Yes above, please explain:

The 25 responses to this question generally demonstrated a lack of understanding of the relationship between participation and performance on state level assessment and state and federal funding allocations. The general tenor of these responses indicate that stakeholders do not support the use of participation data or student achievement data to guide funding allocations in any year, and in a year where learning time and student engagement are impacted by a global pandemic the responses indicate that there is even stronger push against any tie between achievement scores and funding.

While federal and state funding sources are generally unimpacted by student achievement data, some respondents expressed concern about the upcoming legislative session in Montana and the ability our elected officials have to change policy in such a way that would cause low scores or low participation to influence the allocation of state funding.

Several respondents referenced grants or other funding sources that will potentially be impacted by the lack of student achievement data for this year. In response to this concern, the OPI will evaluate current grant funding to ensure that in all cases where state summative data would typically be used, an alternate data source is identified, or the requirement is removed for this year.

Concerns About Lack of Assessment Data

Please describe your overall concerns about the strategic waiver process for assessment, and if any, what the local impacts are due to lack of access to these summative data referenced above.

Of the 64 responses to this open-ended question on lack of access to summative data, many respondents advocated for the flexibility local entities (i.e. districts) have to collect student level data across a wide variety of tools. This flexibility allows all districts to ensure that they are using appropriate assessments and data to meet the wide range of needs present in their communities during the pandemic. The responses indicate a general concern that if the waiver is not granted, a single data point will be forced on schools that are prepared to use multiple

data points to ensure that all students are having all of their academic and social emotional needs met this year.

Some respondents expressed concerns around the impact for individual students who will not have access to the ACT data that is requested within applications for post-secondary education. The OPI will continue to monitor the question of what assessment data is required by colleges and universities and will work with the ACT to ensure that the OPI is offering the appropriate number of test dates in the event that this is determined to be an issue.

One respondent expressed a concern about whether data will be available to support districts in evaluating performance for new teachers in relation to whether they adequately covered their curriculum. The OPI believes this concern can be remediated through the use of other data points to evaluate adherence to local school board adopted curriculum.

Figure 7. Concerns About Learning Time and Instructional Barriers

Under the current conditions, are you concerned that there are students who cannot participate in state assessments due to COVID-19 instructional disruptions or student learning barriers they have experienced over the past school year? (N=114)

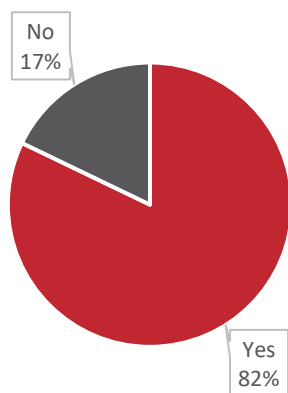


Table 12. Stakeholder Role and Concerns with Funding

Role Category	No	Yes	Total	Percent Yes	Percent No
School or District Administrator	7	26	33	79%	21%
Other School or District Leader (counselor, curriculum specialist, instructional coach, IT specialist, school psychologist, Indian Education Specialist)	1	13	14	93%	7%
System Test Coordinator (STC)	1	8	9	89%	11%
Teacher (Elementary, High School, Middle School, Special Education)	6	45	51	88%	12%
Parent	4	3	7	43%	57%
Total	19	95	114	83%	17%

Concerns About Learning Time and Instructional Barriers

If you answered Yes above, please explain what the COVID-19 instructional disruptions or student learning barriers are.

Ninety-three respondents answered this open-ended question and the vast majority of responses focused on students who are not ready for state summative assessments due to lost learning time caused by school closures, quarantine, remote instruction, and/or illness. Another common theme was the lack of access to appropriate equipment and technology to allow students to learn the material they will be tested on.

Many respondents indicated that they are unsure whether students who are in remote learning settings (either due to district and school closures or who have opted for remote learning) will be able to participate in assessment if no remote option is available. Rationales given for this address both the question of whether it is appropriate to assess students in a setting that is significantly different than their daily learning environment and the question of whether parents of students who have selected remote learning will be willing to bring students in for assessments.

Some respondents reference the idea that our most vulnerable populations (learners with cognitive delays, English language learners, and learners from low-socioeconomic environments) are the students most likely to be unable to participate in assessments this year due to COVID-19 disruptions such as lost learning time or lack of access to appropriate equipment.

COVID-19 Topic Breakdown

The Google Form targeted specific issues that may be directly affected by COVID-19. The question posed for each of these items instructed the respondent to indicate their level of concern for each of these issues in regard to “students who may not be able to participate in state assessments.” In Table 13, the specific issues are indicated in the rows “Areas of Concern.”

Level of Concern About Issues Directly Related to COVID-19

Select the COVID-19 issues that you are MOST concerned with for state testing. Under the current conditions, which of the following statements are representative of your concerns about students who may not be able to participate in state assessments?

While responses to this question are varied, the same four items were consistently rated as the most concerning across all groups:

- Student Equity (fair and equal access)
- Lack of Access (instruction and learning)
- Credibility of Results
- Participation Differences

Table 13. COVID-19 Issues Level of Concern

Area of Concern	Level of Concern	School or District Administrator	Other School or District Leader	System Test Coordinator	Teacher	Parent	Total
Health and Safety of Students and Staff	Least	12%	7%	11%	6%	43%	11%
	Somewhat	48%	36%	22%	48%	14%	42%
	Most	39%	57%	67%	46%	43%	47%
Student Equity (fair and equal access)	Least	9%	0%	13%	6%	0%	6%
	Somewhat	24%	7%	25%	29%	29%	25%
	Most	67%	93%	63%	65%	71%	69%
Lack of resources (such as computer or electronic devices)	Least	45%	21%	44%	16%	57%	30%
	Somewhat	30%	21%	11%	31%	29%	28%
	Most	24%	57%	44%	53%	14%	42%
Lack of technology (bandwidth or other technology limitation)	Least	33%	7%	22%	16%	57%	23%
	Somewhat	27%	21%	33%	24%	29%	25%
	Most	39%	71%	44%	61%	14%	52%
Lack of Access (instruction and learning)	Least	9%	8%	11%	12%	43%	12%
	Somewhat	45%	15%	33%	29%	0%	31%
	Most	45%	77%	56%	59%	57%	57%
Accessibility and student personalized supports	Least	21%	7%	22%	12%	0%	14%
	Somewhat	45%	21%	33%	39%	57%	39%
	Most	33%	71%	44%	49%	43%	46%
Administrative burden (time spent)	Least	36%	7%	44%	28%	57%	31%
	Somewhat	36%	50%	11%	22%	14%	28%
	Most	27%	43%	44%	50%	29%	41%
Administrative Resources (staffing, space, time)	Least	24%	14%	33%	16%	43%	21%
	Somewhat	42%	50%	11%	31%	29%	35%
	Most	33%	36%	56%	53%	29%	44%
Test security	Least	45%	29%	33%	33%	86%	39%
	Somewhat	27%	7%	33%	43%	0%	31%
	Most	27%	64%	33%	24%	14%	30%
Credibility of results	Least	15%	14%	0%	6%	71%	13%
	Somewhat	24%	14%	0%	25%	0%	20%

Area of Concern	Level of Concern	School or District Administrator	Other School or District Leader	System Test Coordinator	Teacher	Parent	Total
	Most	61%	71%	100%	69%	29%	66%
Participation Differences	Least	18%	14%	0%	4%	43%	11%
	Somewhat	27%	14%	22%	29%	29%	26%
	Most	55%	71%	78%	67%	29%	62%
Instructional Differences	Least	21%	7%	11%	8%	71%	16%
	Somewhat	24%	21%	33%	32%	14%	27%
	Most	55%	71%	56%	60%	14%	57%

Level of Concern About Issues Directly Related to COVID-19

If you answered Other above, please explain what the most concerning issues are.

Fourteen individuals indicated that they had an “other concern.” The concerns listed were:

- Inappropriate use of data that does not contain data from a representative sample of students
- Equity of opportunities being offered to students from families that have opted for remote instruction
- Timeframes for testing
- Family resistance or concern about students entering school buildings at all
- Impact on our most vulnerable students not having assessment data
- Level of student stress and frustration or student mental and emotional well being
- Quality of instruction for all students
- Emotional stress on teachers

Local Procedures for Determining Achievement

What local systematic data-based policies and procedures does your school district have for determining student proficiency and progress outside the achievement data from state summative assessments?

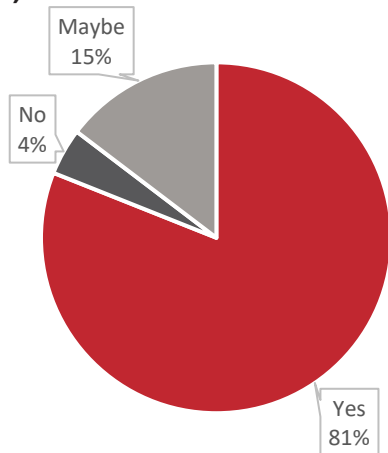
Of the 92 responses to this question, individuals indicate that districts in Montana overwhelmingly have local policies around benchmark assessments and progress monitoring. The tools, processes, and timelines for this vary widely from one school or district to another - current Montana statute requires that all districts must have a continuous improvement plan written and publicly available. It also is required that these plans be reviewed yearly. The Administrative Rules of Montana (ARM) states 10.55.601 (3) (a) Each plan shall include: (iv) a description of strategies for assessing student progress toward meeting all content standards, pursuant to the requirements of ARM [10.55.603](#) and ARM [10.56.101](#).

Across all responses to this item, respondents indicated that their local plans include the following:

- Assessments Designed for Benchmarking
 - MAP (NWEA)
 - Star (Renaissance)
- District Generated Assessments
 - Aimsweb
 - Fastbridge
- Assessments Designed for Identification/Monitoring
 - WIDA/ACCESS
 - DIBELS
- Other Assessments
 - ACT
 - State Provided Interim Assessments
 - Curricular Programs that Include Assessments
 - IXL
 - Curriculum or Textbook Provided Assessments
 - MobyMax
 - iStation/iReady
 - Lexia
- District or Locally Managed Processes
 - Informal Observations
 - Formative Assessments
 - Standards Based Grading
 - Work Samples/Student Portfolios
 - Other
 - 1900 Series
 - Accelus software (used to monitor time in a remote instructional setting)

Figure 8. Local Understanding of Student Support Using Various Instructional Measures

Do you feel teachers understand how to support students using other instructional measures such as formative and interim assessments to gauge student learning? (N=116)



Concerns Related to Training and Guidance

Please explain any additional concerns related to the OPI’s plan for training, technical assistance, guidance, and monitoring of school effectiveness over the course of this school year.

Thirty-one individuals responded to this open-ended question with the majority of the responses centered around the burden on teachers and schools to engage in training and technical assistance in order to administer summative assessments.

This is an indication that the OPI may need to engage more fully with the field around the supports needed for schools and teachers to use formative and interim assessments to gauge student learning and monitor school effectiveness.

Additional Resources or Training Needs

Please describe any additional resources or training needs.

Of the 22 responses to this question, concerns echoed throughout the responses included the following:

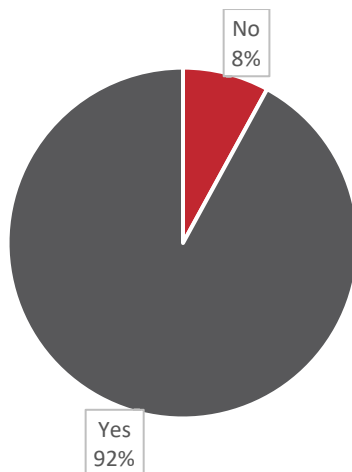
- Additional access to technology both hardware and software for students, teachers, schools, and communities.
- Support for teacher retention
- Support for best practices around instruction for students with disabilities in the context of hybrid and/or remote learning.

Three respondents indicated they needed no additional resources or training at this time.

The OPI believe that the above noted concerns can be addressed by additional resources or training.

Figure 9. Support of the strategic waiver for accountability

Do you support the strategic waiver for accountability under ESEA-ESSA Sections 1111(c)(4) and Section 1111(d)(2)(C)-(D)? (N=113)



Support of the Strategic Waiver for Accountability

If you answered Yes above, how would schools benefit if the Department granted the accountability strategic waivers?

The majority of the 79 respondents who provided comments to this open-ended question reiterated their support of a participation waiver and emphasized the importance of instructional time and reducing stress on students and staff. Ten of them cited the likely unreliability of assessment data gathered when so many students are remote and unable to participate in testing, resulting in test results that do not accurately represent all of Montana's students or the actual impact of the pandemic on learning. A few also mentioned concerns that sudden school closures could interrupt testing windows and further create problems for accountability.

The OPI believes that its efforts in submitting this waiver request reflect the concerns of school and district staff that assessment data for this school year would not reliably represent Montana's students or the impact of the pandemic across demographic areas.

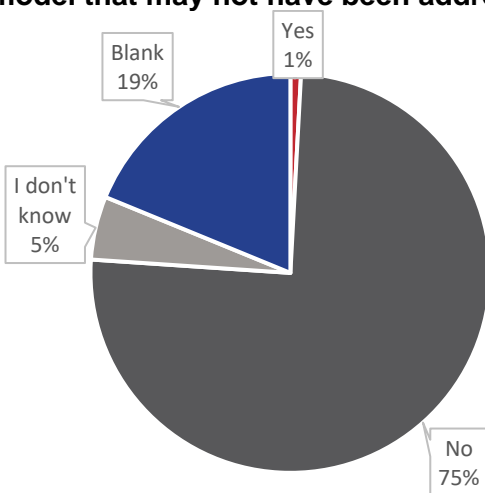
Concerns Regarding School Status in Relation to Accountability Measures

If the strategic waivers are granted by the Department, there will be no academic achievement information from the mathematics, English language arts (ELA), or science state assessments to feed the accountability system for the year 2020-2021. Do you have concerns about keeping schools in the same status?

Of the 94 responses to this question, most indicated that they had no concerns. Ten indicated that they did have concerns but did not specify what they were. Others indicated that, although they were disappointed that their students would not be able to demonstrate their growth, the conditions created by the pandemic preclude adequate participation and reliable data.

Figure 10. Additional Concerns Regarding Accountability Measures

Are there any calculations, business rules, and/or indicators within the accountability model that may not have been addressed by this waiver? (N=96)



Additional Concerns Regarding Accountability Measures

If you answered Yes above, please explain.

One respondent addressed flexibility with IDEA and other federally funded programs. The OPI believes that its efforts in requesting this waiver reflect this concern, expressed elsewhere in other responses, that funding decisions for federal programs should not be influenced by potentially incomplete and unreliable assessment data from the 2020-2021 school year.

Additional Concerns Regarding Accountability Measures

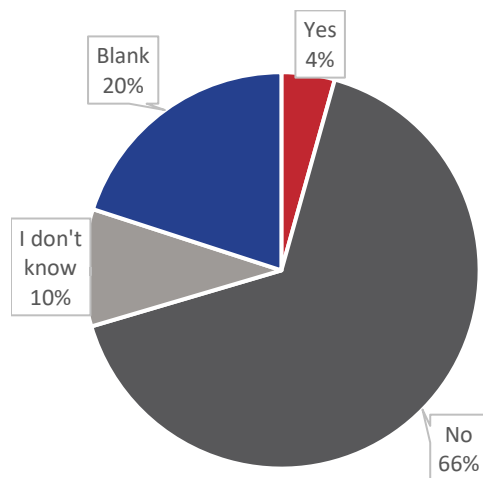
What ideas do you have for Montana’s school quality and school success (SQSS) flex indicator for satisfactory attendance, college and career readiness, and proficiency on science assessments?

There were 31 responses to this question and while responses varied, some noticeable trends across answers included:

- Schools want or intend to use MAP or Star tests to assess their students locally.
- Schools can develop their own local interim or summative assessments.
- This measure should be put on hold until instruction and attendance are able to return to normal.

Figure 11. Concerns About Fiscal Impacts

Do you anticipate any loss of funding or fiscal impacts as a result of not running the 2020-2021 accountability system? (N=117)



Almost two-thirds, 76 of 117 respondents, did not anticipate any funding loss as a result of the waiver, while only five did. The other responses were blank, did not know, or were uncertain. One comment pointed out that it would be unfair to students to make any funding decisions based on this year’s data.

Concerns About Fiscal Impacts

If you answered Yes above, please explain.

Six respondents added comments for this item, but the responses did not all come from respondents who answered “yes,” to the previous question. This is relevant for understanding the survey. These included concerns about the state’s school funding laws based on counts of Average Number Belonging (ANB), losing funds for federal programs, and comments that it would be unfair to decrease funding because of the limitations placed on schools by the pandemic.

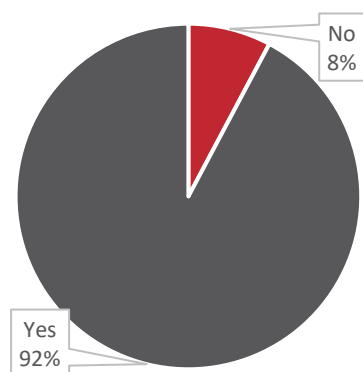
Additional Concerns About the Strategic Waiver for Accountability

Please describe your overall concerns about the strategic waiver process for accountability requirements as referenced above.

Most of the 31 individuals who responded to this item echoed support for the waivers. There were a few expressions of concern that they may not know whether the waivers have been approved until after the testing window closes, which creates logistical difficulties for their schools.

Figure 12. Support of the Strategic Waiver for Reporting

Do you support the strategic waiver for reporting under ESEA-ESSA Section 1111(h)? (N=103)



Support of the Strategic Waiver for Reporting

If you answered Yes above, how would schools benefit if the Department granted the reporting strategic waiver?

Fifty-four respondents provided additional information in response to a “yes” answer to the previous question. Some trends that emerged included:

- Reiterations of support for a participation waiver in favor of more time for instruction.
- School closures and remote scenarios will make it difficult to assess students and provide reliable data, potentially misrepresenting Montana’s students.
- Schools should be held harmless because instruction has been interrupted by forces beyond their control.

Figure 13. Concerns Regarding Participation in State Assessments

Under the current conditions, do you think it is possible to deliver state assessments in-person to 95% of all students and 95% of student groups? (N=105)

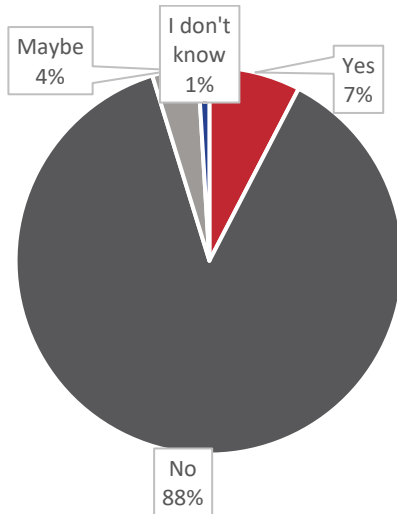
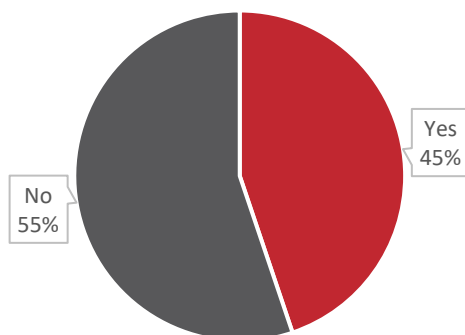


Figure 14. Concerns Regarding Participation in State Assessments

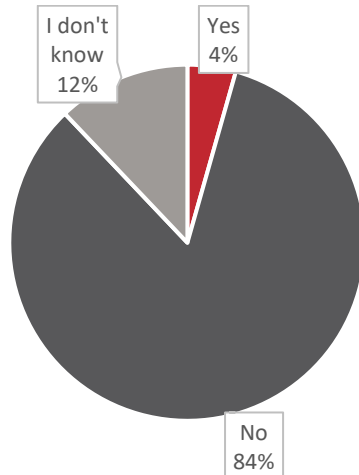
Under the current conditions, do you think a COVID-19 medical exemption waiver offers sufficient relief to address the non-participation concerns of your students? (N=99)



There were 99 responses to this open-ended question. Eighty-seven (87) of the responses indicated concern that families should have a choice in deciding whether they want their children to participate in assessments given the conditions created by the pandemic. The remaining 12 responses indicated some misunderstanding of the question.

Figure 15. Concerns Regarding Funding

Do you anticipate any loss of funding or fiscal impacts as a result of not reporting achievement data from the 2020-2021 school year? (N=91)



Concerns Regarding Funding

If you answered Yes above, please explain.

There were seven responses to this item, not all from respondents who answered “yes,” but which provide relevant insight. All seven responses primarily expressed concern that schools may lose funding for federal programs that depend on assessment data reporting.

Additional Concerns About the Strategic Waiver for Reporting

Please describe your overall concerns about the strategic waiver process for reporting requirements as referenced above.

There were 29 responses to this open-ended question with two major themes emerging. One theme is the reiteration of support for a general participation waiver to free up more time for instruction and to relieve mental and physical stress for students and staff. The second theme that was repeated throughout several responses was around concerns that schools may not know whether any waivers are approved until after testing windows close.

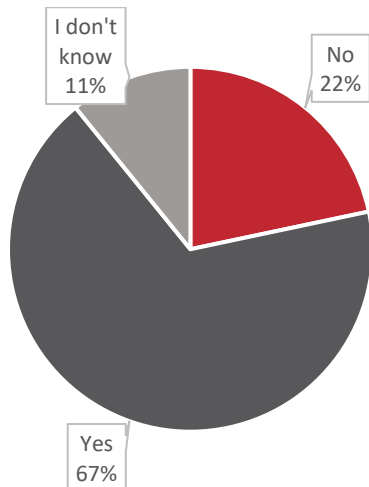
Concerns Regarding Fiscal Implications

What are the fiscal implications for these waivers for existing federal funding?

Of the 44 responses to this question, a portion of individuals expressed uncertainty, but the majority express hope that the federal government will understand the difficult situation of schools during the COVID-19 pandemic and not tie future funding to assessment data from the 2020-2021 school year.

Figure 16. Concerns Regarding Fiscal Implications

Do you think you understand and have the necessary information to ensure that you use funds under the respective programs in accordance with the provisions of all applicable statuses, regulations, program plans, and applications not subject to these waivers? (N=83)



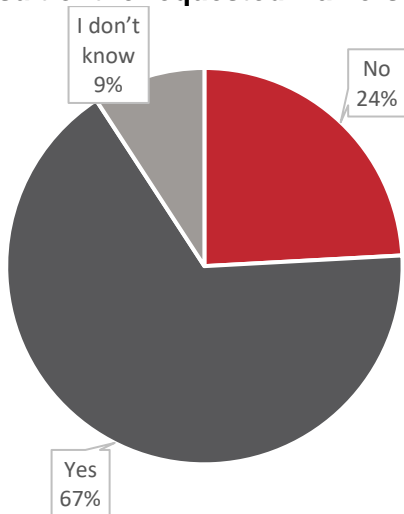
Concerns Regarding Fiscal Implications

If you answered No above, please explain.

Of the 18 responses to this item, almost all indicated that this knowledge was outside of the professional responsibilities of the respondent. One comment insisted that flexibility will be required to ensure equal access for all students.

Figure 17. Mitigation of Negative Effects

Do you understand how to work to mitigate any negative effects, if any, that may occur as a result of the requested waivers? (N=81)



Final Concerns About the Strategic Waivers

YOUR TURN: Is there anything else you believe the OPI should consider?

Forty-five respondents answered this final question. Several major themes were noticed throughout the responses. Many respondents showed support of a general participation waiver to free up more time for instruction and to relieve mental and physical stress for students and staff. Another similar theme was an appreciation to the OPI for requesting the waivers and holding informational sessions.

Other trends included pleas to increase funding for public education, pleas for compassion for educators, students, and all Montanans affected by COVID-19, and pleas for awareness of the impact that the pandemic has had on special education. A final trend that emerged was related to questions about family choices to opt in to testing if the waivers are granted.

Public Comment Summary – Menti Survey

Due to the size of the audiences participating in each Strategic Waiver Webinar, the Menti Survey was used in order to gather information and capture thoughts, questions, and concerns regarding the Amendment Process and Strategic Waiver Process. The Menti Survey responses are summarized by the common questions organized by the webinar date. The OPI provided five Strategic Waiver webinars in January to gather public comments via Zoom. Stakeholders were provided the opportunity to attend one or more webinars and complete the Google Form. The asterisk contained in each of the tables below indicates the Special Education Director's Call which was held at a separate time from the four Strategic Waiver Webinars.

- January 7, 2021 – Strategic Waiver Webinar #1
- January 14, 2021 – Strategic Waiver Webinar #2
- January 21, 2021 – Strategic Waiver Webinar #3
- January 21, 2021 – Special Education Director's Call
- January 28, 2021 – Strategic Waiver Webinar #4

The following is a summary of the Menti Survey results from the five webinars. The stakeholder's response to these webinars highlights that reduction of testing, in general, is a benefit to students because it most often indicates an increase in available instructional time. Schools and districts will rely on local assessments at this time because the timing and grain size is a more appropriate match for shifting instruction and providing targeted support to individual students. The waiver will allow schools to increase the quality of instruction for students and in turn improve academic outcomes for students as they are able to use their instructional time to provide instruction responsive to data gathered on local assessments and will be able to use local assessments to guide their work with families during this unique time.

Table 14 is the attendance from each of the four webinars. Each webinar date shows the number registered, number attended, and the number of Menti participants. Throughout the five webinars, a total of 245 voices were recorded.

Table 14. Menti Survey Registered vs. Present Attendees

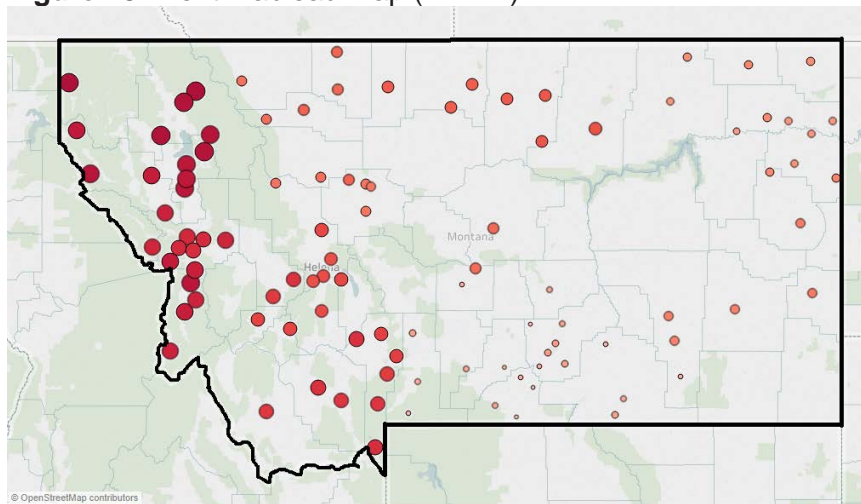
	Jan. 7	Jan. 14	Jan. 21	Jan. 21*	Jan. 28
Number Registered	83	56	47	+	180
Number Attended	52	28	29	+	211
Menti Participants	37	15	14	17	153

The plus (+) indicates this information was not available at the time of this report.

Menti Map

Figure 18 pictured below shows the geographic regions across the state of Montana that participated virtually in these webinars and used the Menti survey. The size of the bubbles differs depending on how many voices were reported for that unique zip code.

Figure 18. Menti Tableau Map (N=241).



Note: Three respondents did not provide a zip code.

Table 15 shows the type and number of education entities represented in the waiver webinars and answering the Menti Survey. This survey allowed school districts to report the “K-8 or One Rooms Schoolhouses” information to the OPI, but it was not possible to classify these districts up into the high school feeder class sizes as reported above.

Table 15. Menti Survey MHSA Representation by Webinar Date

Row Labels	Count on Date				Grand Total
	1/7	1/14	1/21	1/28	
A District	8	2	5	26	41
AA District	8	2	2	21	33
B District	4	2	5	29	40
C District	4	5		46	55
K-8 or One Room Schoolhouse	5	1	1	18	25
None		1		3	4
Other	5	2	1	12	20
Grand Total	34	15	14	155	218

The Menti Survey asked attendees to indicate the size of the school district they were associated with.

Table 16. Menti Survey District Size

Category	Class AA	Class A	Class B	Class C	K-8 Independent	Other
Count	34	42	41	55	25	20
Percent	16%	19%	19%	25%	12%	9%

No students responded to either survey. The District Teacher Union President and School Psychologist roles were added through the Google Form process under “other.” All other roles were reported in accordance with the list options available in the survey. One student did submit comments during the Special Education Advisory Panel which is described in the summary section of this event.

Menti Survey Questions

How is instruction primarily being delivered to students in your school system?

This question was asked in two of the five webinar groups. Respondents answering this question reported just over one half of the respective school systems are learning in a hybrid or remote only method. **Table 17** indicates the number of responses for each mode of instruction across the 186 responses.

Table 17. Current Primary Mode of Instruction

Date	In-School	Hybrid (Blended)	Remote Only	Other	Total
January 7	12	16	5	4	37
January 28	71	63	11	4	149
Total	83	79	16	8	186

Key Documents and Resources

This question was asked in each of the five webinars and elicited a total of 56 responses. Three respondents found the documents helpful, one requested the location of the documents, and four respondents were unsure of any questions about these items. The remaining individuals responded that they had no questions at the time. The OPI will keep all key documents and resources available to the public on the OPI’s website.

Table 18. Key Documents and Resources

Date	Yes	No	I’m Not Sure	Total
January 7	1	26	2	29
January 14	0	4	3	7
January 21	0	3	0	3
January 21*	1	14	2	17
Total	2	47	7	56

Position for Addendum Process

Table 19. Support for the Accountability System Addendum Process

Date	Yes	No	I'm Not Sure	Total
January 7	26	0	1	27
January 14	4	0	1	5
January 21	1	0	2	3
Total	31	0	4	36

Benefit Accountability System Addendum Process

There were 22 responses to this open-ended question posed during three of the five webinars. The majority of the responses focused on the benefits of maintaining the health of students and staff and allowing schools to focus on instruction. The other trend that emerged concerned assessment data. Respondents felt the resulting data from administering assessments this year would not yield reliable or valid results and could not be used to determine growth over years. The respondents were primarily responding to the benefit of waiving state testing as a whole and not directly related to the benefit of the addendum or the strategic waivers. It appears most respondents to this question were emphasizing their preference for the waiver to remove the annual state testing requirement this year.

Table 20. Response to Benefit Accountability System Addendum Process

January 7	January 14	January 21	January 21*	January 28
18	3	1	NA	NA

Overall Concerns with the Accountability System Addendum Process

Seventeen (17) individuals responded to this question. One person had concerns about longitudinal gaps, three individuals were unsure if they had concerns, while the remaining 13 respondents shared concerns not applicable to the addendum. These concerns centered around the retention of grade level material by students, loss of learning, and using precious teaching/learning time for testing.

The Accountability System Addendum is important as it seeks to provide school districts with an extension of the COVID-19 Accountability waivers and relief from the impact of COVID-19 on the accountability system for the 2020-2021 school year. Given that Montana cannot adequately calculate an academic growth measurement, defined by comparing two consecutive years of a student's normalized assessment scores, or some of the measures of Montana's fifth flexible indicator for School Quality and Student Success (SQSS), it cannot meet the requirement to differentiate all public schools based on all five required indicators. Thus, Montana is proposing to shift the identification process forward one year to 2022-2023.

Table 21. Response to Overall Concerns with the Accountability System Addendum Process

January 7	January 14	January 21	January 21*	January 28
17	NA	NA	NA	NA

Position for State Testing Waiver Process

Table 22. Support for the Strategic Waiver to Cancel Spring 2021 State Testing

Date	Yes	No	I'm Not Sure	Total
January 7	22	0	2	27
January 14	4	0	1	5
January 21	2	1	0	3
January 21*	17	0	0	17
January 28	101	13	2	116
Total	146	14	5	165

Benefit of Strategic Waiver for State Testing

This question was posed to the attendees of three of the webinar meetings. Of nineteen responses to this question, three trends emerged. Most responses centered around the ability to maintain the health and safety of students and staff, and that without waivers, schools will not have consistent or valid data. Their view was these waivers protected the integrity of the state assessments but if forced to test this year the data would be questionable and inconsistent with past years. Respondents felt data would be disrupted and the data received from testing only students on-site would not result in accurate data. The third trend indicated respondents felt the waivers would allow schools to focus on instruction and learning, rather than testing. One response indicated they believed interim/formative assessments will be utilized if the waiver is approved.

Table 23. Response to Benefit Accountability System Addendum Process

January 7	January 14	January 21	January 21*	January 28
17	1	1	NA	NA

Overall Concerns with the Strategic Waiver for State Testing Process

Nineteen individuals responded to this question. Twelve respondents indicated they had no concerns. Five responses involved concerns about having two years without test results and/or incomparable data, resulting in inaccurate indications of performance and growth. Other responses indicated a concern about not receiving approval or denial of the waivers before testing, or the testing waiver not being approved at all.

Table 24. Response to Overall Concerns with the Strategic Waiver for State Testing Process

January 7	January 14	January 21	January 21*	January 28
15	3	1	NA	NA

Position for Accountability Waiver Process

This question was consistently asked with each webinar group over the five meetings. In total 159 voices were captured with 92% (N=146) in approval of the 20-21 accountability waivers.

Table 25. Support for the Strategic Waiver to Suspend 20-21 Accountability

Date	Yes	No	I'm Not Sure	Total
January 7	23	0	1	24
January 14	3	0	1	4
January 21	2	0	1	3
January 21*	17	0	0	17
January 28	101	5	5	111
Total	146	5	8	159

Benefit of Strategic Waiver for Accountability

This question was presented in isolation to the first webinar group; however, after this meeting, the question was combined for all waivers being sought. Similar points were raised from the respondents who answered in favor of this question with benefits. These included reducing stress in education, providing flexibility to schools, and allowing the focus on teaching not testing. In addition to these repeated concerns, some respondents shared a concern about utilizing testing for growth and comparisons with missing or sporadic data and a belief that schools should not be held accountable for a situation beyond their control. The OPI has indicated its response and action to these concerns within the Montana Waiver Application narrative.

Table 26. Response to Benefit to Suspend the Accountability System

January 7	January 14	January 21	January 21*	January 28
14	NA	NA	NA	NA

Overall Concerns with the Strategic Waiver for Accountability Process

This question was presented in isolation to the first webinar group; however, after this meeting, the question was combined for all waivers being sought. A total of 17 people responded to this question; however, all answered “none” with the exception of five. The five responses that were not categorized as “none” expressed concerns with missing two years’ worth of data and judging schools based on these data from three years ago optimal. A concern about funding was also raised. The OPI has indicated its response and action to these concerns within the Montana Waiver Application narrative.

Table 27. Response to Overall Concerns with the Strategic Waiver for Accountability Process

January 7	January 14	January 21	January 21*	January 28
17	NA	NA	NA	NA

Position for Reporting Waiver Process

This question was consistently asked with each webinar group over the five meetings. In total 158 voices were captured with 94% (N=148) in approval of the 20-21 reporting waivers.

Table 28. Support for the Strategic Waiver to Remove Certain Elements of the 20-21 Report Card

Date	Yes	No	I'm Not Sure	Total
January 7	20	0	2	22
January 14	4	0	1	5
January 21	1	0	1	2
January 21*	17	0	1	18
January 28	106	2	3	110
Total	148	2	8	158

Benefit Strategic Waiver for Reporting

Table 29 includes the cumulation of the benefit responses presented to attendees from every meeting after January 7. After the January 7th meeting, the presenters asked the participants to only respond with an overall benefit to the waiver requests presented to them in the presentation. The January 7 values were presented in isolation to the first webinar group. Thirty-one respondents shared that benefits would include using valid and reliable reporting data for the whole student population. In addition, respondents emphasized this process would support the health and safety of their communities and provide families with a voice. The OPI has indicated its response and action to these concerns within the “Montana Waiver Application” narrative.

Table 29. Response to Benefit Strategic Waiver for Reporting

January 7	January 14	January 21	January 21*	January 28
10	3	1	17	NA

Overall Concerns with the Strategic Waiver for Reporting Process

Table 30 includes the cumulation of the concern responses presented to attendees from every meeting after January 7. After the January 7 meeting, the presenters asked the participants to only respond with overall concerns to the waiver requests presented to them in the presentation. The January 7 values were presented in isolation to the first webinar group. Thirty-one participant responses were received for this question. These concerns surrounded identified targeted subgroups data, the state accountability process, and the late decision on the approval of the waivers from the U.S. Department of Education. The OPI has indicated its response and action to these concerns within the Montana Waiver Application narrative.

Table 30. Response to Overall Concerns with the Strategic Waiver for Reporting Process

January 7	January 14	January 21	January 21*	January 28
13	3	0	15	NA

General Questions and Concerns

Concerns About Funding or Programs

Forty individuals responded to this question. Some comments for this question expressed the need for funding to continue to support local needs during unsafe conditions. While there were responses that discussed funding in general, the responses were generally not applicable to the question as the responses were not in relation to funding or programs relying on reporting data. The OPI has indicated its response and action to these concerns within the “Montana Waiver Application” narrative.

Table 31. Response to Funding Concerns with the Strategic Waiver Process

January 7	January 14	January 21	January 21*	January 28
20	3	0	17	NA

Questions on the Immediate OPI Actions

There were 34 responses to this question. Of the 34 individuals responding, 32 had no questions. One individual expressed a desire to request a waiver specifically for the Smarter Balanced assessment this spring. The final respondent wondered what kind of documentation will be needed from districts when using the COVID-19 medical exemption.

Table 32. Response to Questions on the Immediate OPI Actions

January 7	January 14	January 21	January 21*	January 28
34	NA	NA	NA	NA

Table 33. Response to Questions on 3 Separate Processes

January 7	January 14	January 21	January 21*	January 28
NA	9	6	NA	NA

Questions About the OPI’s Services

There were 10 responses to this open-ended question. Two questions were raised, one for clarification about targeted supports being continued. The other respondent requested more PD and support on Interim assessments. Any school identified for comprehensive (CSI) or additional targeted support and improvement (ATSI) will continue to receive supports and interventions through the 2021-22 school year. The OPI has indicated its response and action to these concerns within the “Montana Waiver Application” narrative.

Table 34. Questions on Services and Continuation of Support

January 7	January 14	January 21	January 21*	January 28
NA	6	4	NA	NA

Table 35. Needs Met in Webinar

This question was consistently asked with each webinar group over the three meetings shown below. In total, 25 voices were captured with 80% (N=20) indicating that their needs were met.

Date	Yes	No	I'm Not Sure	Total
January 7	15	0	3	18
January 14	3	0	2	5
January 21	2	0	0	2
Total	20	0	5	25

Table 36. Response to Open Forum to Share Concerns

January 7	January 14	January 21	January 21*	January 28
18	2	0	15	NA

Thirty-five responses were received on Table 36. Two of the respondents requested the location of the forms, documents, and links. Many individuals had no further needs or concerns and expressed their compliments on the OPI's presentation and communications. In addition to these comments, some indicated a need for consistent, clear communication from OPI. Another comment indicated that the policies should be reflective of and supported by the realities of persons who are experiencing matters on the frontlines. The OPI has indicated its response and action to these concerns within the "Montana Waiver Application" narrative.

Public Comment Communication Received

There was a total of eight emails received during the public comment period related to Montana's Strategic Waivers. Of the emails the OPI received, four of them explicitly stated their support for the pursuance of the waivers, three of the responses remained neutral, while one stated support of the adjustment to the statewide assessment testing blueprint.

The four letters of support for the waivers each stated specific concerns around administering statewide assessments in the Spring of 2021. One of the reasons for supporting the waivers was due to "total numbers of captured tests this year will be lower than normal due to the non-attendance for test sessions of several 100% remote students whose parents are apprehensive to bring their remote student/s into the school setting for testing and for quarantined students whom I may be unable to capture in the testing window" ([PubComEmail 2](#)). The letter further states that reduced participation numbers within the district, due to remote learners whose parents would not permit them to be at the physical school building, would result in the district not reaching the required 95% participation rate and this negatively impacts Title III funds for the district. Another letter of support for the waivers outlined a general concern of lost classroom teaching time when preparing students for a statewide assessment ([PubComEmail 4](#)).

Questioning the validity and reliability of any standardized score reports this spring ([PubComEmail 5](#) & [PubComEmail 6](#)) was questioned by two of the supporters of the waivers as well.

One of the letters noted that they are in support of the "the smaller test version [which] was a smart move" ([PubComEmail 3](#)). The *smaller test version* being referenced is the OPI's decision to adjust/shorten the Montana blueprint for statewide math and ELA assessments. There was no reference to the waiver process in this letter.

Finally, there were two letters that neither supported nor approved the waivers. The first one provided a link to the National Association of Elementary School Principals COVID-19 survey results, which states as one of its key findings that “to have to administer [assessments] is going to be unreliable and prove to be very difficult with students who do not show up to school” ([PubComEmail 6](#)). While this letter does not explicitly state a position on the waiver process, it can be fairly deduced that sending the link to the aforementioned report does in some way suggest that the author of the email is in support of the waiver process. The second neutral letter was deemed such due to the topic being about the redaction of score reports for their district. This conversation will ensue with the sender of the email and the OPI around federal regulations around FERPA and does not impact the pursuance of these waivers.

In reading through the emails that have been provided, there is a general theme around the perceptions and use of data at the local level to drive decision making. As such, the OPI noticed a general theme of needs for education and training around standard achievement data use and literacy using the OPI's existing reporting tools; therefore, the OPI Assessment Unit shared this feedback with its Data and Reporting Division so the MITI Grant project could incorporate the public comment into its user-based design and also allow these users to engage in the longitudinal data system re-design efforts.

Additional Stakeholder Meetings

Stakeholder input will assist the OPI in addressing real world concerns and understanding how different and individual groups feel about the changes in testing, accountability, and reporting. Their comments will inform next steps to help strength the quality and relevance of the rules and dictate what resources are needed to support implementation of the rules.

Education Caucus Meeting Summary

Throughout the 2021 Montana Legislative Session, the OPI hosted an Education Caucus every Tuesday at 7 am in Room 335 at the Capital starting January 12. The OPI Assessment Unit was able to disseminate materials during the first Education Caucus. The following materials were available:

- [Statewide Assessment Overview 2020-2021 School Year](#)
- [Strategic Waiver Timeline](#)
- [Strategic Waiver Purpose](#)
- Montana Strategic Waiver Process Cover Letter (see page 2)

Superintendent Elise Arntzen was available to answer questions about the Strategic Waiver.

Tribal Caucus Meeting Summary

On January 14, the OPI presented the strategic waivers to the Montana Legislative Tribal Caucus via a virtual Zoom meeting. There were approximately twelve people present including liaisons from the Governor's office, U. S. Representative Matt Rosendale's office, the Director of the Montana Office of the Commissioner of Higher Education, the Superintendent of the Office of Public Instruction, and members of the state legislature who represent the various Native American tribes across Montana.

The meeting presentation included an overview of the challenges facing the gathering of standardized assessment data in 2020-2021 and Montana's response in seeking a series of strategic waivers (i.e. testing, reporting and accountability) to address the concerns of this data collection challenge and to alleviate burden to districts and schools. During discussion,

Representative Jonathan Windy Boy asked for clarification on any contingency plans should the waivers not be granted.

Overall, there was no opposition to the proposal for the OPI to seek strategic waivers around testing, reporting, and accountability. The Tribal Caucus also wrote a letter in support of the waivers, which is included in this submission.

Special Education Advisory Panel Summary

On January 20, the OPI attended a meeting of the Montana Special Education Advisory Panel to share information and gather comment from this important stakeholder in the pursuit of the Montana Strategic Waivers. During the [panel's agenda](#) for updates from the OPI, information was shared about the waiver process and what the approval of the waivers mean and do not mean.

Two comments were received by the panel. One high school participant asked if the waiver would impact the ACT test and shared her personal experience with testing and interest to take the ACT this spring. She further agreed that some of her peers may find the test stressful given a very uncertain academic year.

The other participant asked if the waivers were intended to avoid state testing. He commented that if so, we are missing out on data that can show the impact of remote learning. The OPI representative shared that because of the variability in instruction, the intent is to seek flexibility for local school districts to determine what is best for their students.

OPI-Summarized Concerns

- Most participants expressed a desire to extend the waiver beyond the spring 2020 for this 2020-21 academic year to ensure that students and teachers have time to recover and rebound.
- Most comments indicated a preference to see all test-related evaluation or accountability systems be paused until the OPI is able to administer census tests again.
- In many cases, participants used this opportunity for public comment to share their broader thoughts about the impact of COVID-19.
- Based on the responses of some participants, it is clear that Montana schools rely on assessment data for a wide variety of activities beyond just the state level accountability metric.
- Our 2020–2021 waiver request is strongly aligned with the responses to this survey as we request additional flexibility for the coming test season.

In conclusion, the OPI will respond to these comments within its overall communication and training plans for school districts as we move forward to this spring. The OPI will also share additional information on its state website to clarify concerns about funding and professional development needs.