



# Chapter 55

**These are written  
Public Comments on the  
6 rule revisions coming from  
Staffing Ratios  
Received May 17<sup>th</sup>, 18<sup>th</sup>, 19<sup>th</sup>**



**Written Public Comment**  
**Staffing Ratios**  
**Received May 17<sup>th</sup> and 18<sup>th</sup>**

I'm writing to advocate for the continued usage of the school counselor to student ratio in schools. The need for mental health support in schools is higher than ever. Without enough school counselors in schools, students have no trained professional to go to when they are feeling suicidal, overwhelmed, dealing with grief, or in need of other counseling supports. I work at a small school where we currently have around 120 students. I am the only school counselor but I am constantly busy with running between lessons, calling parents, managing student behaviors, performing suicide assessments, and serving as general school support. Many school counselors have a much higher ratio than I do and this is when students start to fall through the cracks. We lose so many students to suicide and even more students go through life feeling that they have no one to talk to. School counselors have many roles and the need for our school supports is at an alltime high. Please maintain the school counselor to student ratio and lower it for greater student success.

*Caitie Bloom*

*School Counselor*

*DeSmet Elementary*

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I am writing as both a parent with students in elementary and middle school, and as a high school English teacher in Missoula. I read Superintendent Elsie Arntzen's recommendations and am extremely concerned with the loss of librarians and school counselors that she is suggesting in her proposal.

Both of these positions are extremely valuable to students, teachers, and the academic climate of any school. My children speak highly of their librarians as they value their knowledge of age and reading level appropriate books, they are aware of current technology, and are educators in their field. How are we to show a value for reading if we cut librarians- teachers in their own right.

Here at the high school I teach at, our librarians host reading groups, have built strong relationships with students based on books and subject matter, and continue to help us teachers navigate ESL students who want books that are highly engaging in content but lower level in reading.

Counselors also seem to be under valued by the Superintendent's proposal. In addition to helping students navigate college choices, scholarships, classes, and other options outside of the college track, our counselors have worked exhaustively to offer mental support to students who are struggling on a daily basis.

Every teacher will tell you that students are fragile and vulnerable. Part of our job now is to help them advocate for breaks, for support, and for actual counseling. I teach upper level advanced English and freshman English and both groups of students use this support.

At the middle school and elementary levels- where my children attend- these wonderful counselors are teaching kids how to recognize and foster their feelings and how to verbalize their needs.

The idea of cutting positions in urban and rural areas of Montana is truly absurd and would be a definite deficit to public education- where students have a right to feel safe, respected, and supported.

Thanks for your time,

Caroline Lurgio

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**Please maintain the librarian and counselor ratios.**

thank you,

Carolyn Pardini

Retired Public School Teacher

Polson City Commissioner

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My name is Catie Cook Dennehy and I'm a School Counselor at Hellgate Elementary School, as well as a Past-President of the Montana School Counselor Association. It has come to my attention that Ms. Arntzen has recommended that the School Counselor to Student ratio should be removed. In this time of need, following a Pandemic, I believe this is a very dangerous and misguided step to make.

This is my 17<sup>th</sup> year as an Elementary School Counselor and currently my ratio is 1:342 in our K-1 Building. We have one of the largest Elementary Schools in the area. I believe I am lucky in regards to my ratio, but currently we are in the process in our district, of looking at hiring MORE School Counselors. This is due to the fact that in some buildings on our Elementary campus, the ratio is closer to 1:550. At this time, we are getting MORE PARENT requests for us to work with children, than I have ever seen. This is happening for two main reasons I believe. One is that Mental Health is finally recognized as one of the top most important pieces of overall health. Two, is that after the pandemic, so many families have fallen apart (whether by divorce after being locked down together, loss of jobs, alcohol use and drug use is on the rise, and social issues have increased). The local therapists are maxed out and unable to take new clients, and these kids then are left in the hands of School Counselors. Weekly I get more and more kids referred to me, who need multiple sessions.

If the School Counselor to Student ration is removed, I believe we may see more of the following...

1. More kids being kept home from school.
2. More kids falling behind in class, as they won't have someone consistent to help them with big issues.
3. More teachers leaving the field.
4. More parents complaining that we aren't meeting their student's needs.
5. More students referred to Special Education with Emotional Disturbance labels, simply to get them more help.
6. More Special Ed. Teachers needing to be hired.
7. More kids missing class to travel to outside Therapists.
8. Less Preventative Lessons, as there will be no time to teach. For example the program called Speak Up Be Safe.
9. More bullying.

10. More abuse due to less emotional regulation.
11. More children in the Principal's office.
12. A lack of basic social skills.
13. A shortage of School Counselors, due to burn out.
14. Parents lined up at the Principal's office on a regular basis.
15. More students dropping out of school.

These are only a few examples of what might happen. Please dismiss the idea that we need to remove these ratios, and instead recognize how dire it's become to instead move the ratio from 1:250 in the State of Montana.

Thank you,

Catie Cook Dennehy

*Catie Cook Dennehy M.Ed.*

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I was made aware of additional changes that Ms. Arntzen want to make at the Middle School level. Please ask her to maintain and preserve all of the electives and class requirements at that level. Our students need that variety for lifelong learning. What is the purpose of leaving out the specific types of electives and making it so general? For some students, music, art, and technical education courses are the reason they look forwarding to coming to school. Eliminating them won't help our students in any way.

As for counseling, the thought of only having one counselor for our 1100 students is disturbing. Our three counselors are busy helping students every day with their social-emotional needs, academic struggles, and family issues that interfere with their learning. They are an absolutely vital part of serving our students. By having one counselor per grade level, full time, we can help students feel a sense of security and continuity as they navigate one of life's most challenging developmental levels. How would cutting the positions be a good thing for our students in any way?

Christi Williams

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My name is Christina Sieminski, I am a proud mother of two daughters and a public school educator here in Helena, MT.

I am writing because I am concerned about the proposed changes to school accreditation standards. I see firsthand on a daily basis the mental health crisis that we are currently in. K-12 students are in need of mental health services now more than ever. I am very concerned about eliminating the ratio of students:counselors and the impact this will have on our kids. We need more mental health services in our schools not less. I see how overworked our counselors currently are, the ratios are already too high. Any given time in some of our elementary schools there are half a dozen kids, sometimes more, in some sort of mental health crisis. Between the one elementary principal, the one counselor and support staff there are at times not even enough hands to help with our current student loads. Eliminating this standard will no doubt result in these numbers and these loads becoming unbearable for our elementary buildings. Gone are the days that counselors are there just to talk about college and career readiness. If our school counselors aren't there to help our students then who will? I want our kids to have access to high quality and trained individuals who know how to deescalate situations, how to spot a child who is in an unsafe position at home, how to support our students who have lost parents and family members, who can teach our kids resiliency and coping, who is trained to know how to

comfort the child who watched a family member get abused the night before, who can help students navigate social situations, can help students that struggle with social skills make a friend, who can be on the frontlines to combat bullying, who is there to help students get services whether that's food to tide them over until the next day at school, or clothes that are warm enough to wear in the winter. These are all very real situations facing our kids here in Montana. Our students are hurting, and these changes will hurt them even more.

My daughter Ava is currently in fifth grade, her favorite part of school is the library and the librarian. Eliminating this ratio will ensure that our students have less access to librarians who teach our kids how to protect themselves online, how to do research and determine whether a source is legitimate or not and encourages our daughter to dive into the world of reading.

I've always been proud of our Montana schools, our public schools do so much for our community and are centered around shaping well rounded individuals. Because of public school our kids are exposed to a wide arrange of subjects including the arts, music, library, languages, tech ed, science, history, reading and math. While many kids have parents who are able and willing to expose them to this wide variety of areas, these changes will negatively impact our low-income students the most.

I grew up in Montana and because of these guidelines that have shaped public schools for decades, when I went to college I had the opportunity to go into almost any field that I wanted to because of the well-rounded education that I received. Our public schools are currently under a budget crunch, and cutting these programs will ensure that some of these programs are cut across many of our schools.

Please think about all of these things as you make your decision, because the decisions you make will have long lasting and far reaching impacts. Thank you for your time it is appreciated.

Sincerely,

Christina Sieminski

Mom and CHS Educator

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I am writing to ask that the Negotiated Rules Making Committee at OPI will please take into consideration for keeping the current rules for librarians and school counselors. These positions in schools are absolutely essential for students. Librarians help students find new passions in school, and a safe place to explore learning. With the trauma rates going up in schools, counselors are so important in helping students navigate an ever changing world. These positions go beyond just being a job for an individual; they become what defines a school.

Sincerely,

Connie Allsop

Kindergarten Teacher

Corvallis Primary

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I am alarmed to learn that Superintendent Elsie Arntzen recommended sweeping changes to school accreditation standards that would negatively impact rural schools and Montana students' access to counselors and librarians. Please encourage the Negotiated Rulemaking Committee to maintain librarian and counselor ratios.

Thank you for your time,

I feel that in these times with as many children committing suicide and doing drugs, among other issues our youth has, it is not a good idea to have options for a counselor. These children need access to someone they can talk to. Giving the options, districts will lean towards saving money instead of looking out for the students. Money has always been an issue with education and everyone knows that when it comes to politics, money always trumps what is right for the students. It is very sad, and passing this will just give districts more ways to save money.

As far as librarians go. As teachers, we are always told how important reading is in an educational curriculum. It makes absolutely no sense to give options for librarians. Again, it comes back to how the districts can save money. Any opportunity they get to do so, they will.

I truly feel that our education is more of a business anymore rather than helping students. It's bad enough teachers don't get paid what they deserve, but even worse when money affects the lives of our children.

Thank you!

***Persistence is the best weapon for success!***

Mr. Schwartzkopf

5th Grade

Orchard Elementary

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I am writing to express my extreme disagreement with Superintendent Arntzen's recommendations to remove the ration for school librarians and school counselors in the state of Montana. Both of these positions are the central to the beating heart of every school in this great state. School Counselors are on the first line of defense and protection for student's happiness and mental health in our schools. Our school counselor at Rossiter here in Helena, is a vital resource for our staff and students. **If anything, we should be reducing the ratio for schools.** Imagine a world, where students' mental health was prioritized and given MORE resources. As a public school teacher, I am appalled that it is even being suggested that school counselors should be reduced in our school settings. THIS IS NOT THE REALITY ON THE GROUND! Post-Pandemic, we have seen an increase in student mental and emotional health issues. These effects will be felt for a long time to come. We should be considering the opposite of what Superintendent Arntzen is suggesting.

The idea that librarians would not be considered a vital part of any school is preposterous and would move Montana in the wrong direction. Books are one of the most powerful educational tools teachers have. Librarians cultivate vibrant collections of books, put books in kids hands and inspire kids to love reading. It is essential that librarians be given the respect they deserve just like counselors are.

Please consider my comments before these proposals are decided on.

Thank you for your time,

Emma Schmidt

Rossiter Elementary

Helena, MT

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Since starting my career as a school counselor I have seen a rise in mental health struggles among our students. It is appalling that with this increase in mental health struggles Superintendent Arntzen is recommending extreme changes to our public school accreditation standards. Eliminating so many programs and requirements that connect our students to school, make them want to be in school, and connect them with services that keep them safe and healthy in our communities does a huge disservice to our students.

Even at the recommended ratio of one school counselor to 400 students, it is a struggle to help every student that needs it. Eliminating this ratio all together leaves our students even more vulnerable to the challenges they face. It is especially disheartening as a school counselor from the Flathead Valley.

In my experience, we are often the people who students go to with concerns about their friends. I, in my role, have worked very hard to be present with my students and make myself visible so that my students know I am a resource for them when they need help. Superintendent Arntzen's proposed changes eliminate the recommended ratio of student to counselor numbers. The more students on a school counselor's caseload, the more challenging it is to support students in need.

Additionally, school is a place where students should be able to find their interests and try new things. Eliminating electives and access to school librarians makes it impossible for our students who cannot participate in activities outside of school to access many of these opportunities. We owe our students the opportunity to participate in classes that they are passionate about and try new things.

All that being said, I ask that the Negotiated Rule Making Committee maintain the librarian and counselor ratios, as well as maintain specific electives and credit requirements for middle schools.

Erin Joronen

**Erin Joronen**

School Counselor

Somers Middle School

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I am currently a middle school counselor in Billings, serving over 300 students. I am very aware that I am lucky with the caseload that I have and cannot imagine how difficult it would be for school counselors to properly help more than this amount or for schools not to have us at all. The number of students that we are helping with anxiety, various social/emotional issues, and depression is astronomical. Suicidal ideation, depression, and self-harm fall within the top reasons why I have met with students this year. Because we are seeing more and more mental health issues in schools, I highly encourage a change in the ratio to the National recommendation of 250:1 and recommend that the ratio remains within the accreditation standards.

I strongly disagree with the changes that Supt. Arntzen has presented and I believe she has no right to propose these drastic changes within our schools. While she may be our superintendent, she is grossly out of touch with what life is like in our schools and what our students are going through. Montana educational staff deserve better and our students deserve THE BEST. Elsie Arntzen does not have our best interests in mind.

Hayley LePiane

Proud Billings Public Schools Counselor

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I am writing to you, as I am disgusted with Elsie Arntzen's motives to make ludicrous changes to librarian and counseling services for Montana's children. And now she wants to do away with middle school-enriching classes. We have a free and public education system to create a platform for highly educated citizens. She has no right to take these educational opportunities away from our future citizens. PLEASE DO NOT SUPPORT

WHAT ARNTZEN IS PROPOSING. On behalf of our state's future adults, DO NOT support these ludicrous suggestions.

Warm Regards,

Jaydee Zakovi B.A. NBCT

Special Education Teacher/Case Manager

Capital High School

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I just found out that Superintendent Arntzen is trying to make changes to the minimum FTE requirements for school counselors and librarians and eliminating requirements for elective subjects. Please know that this would be one of the worst things that could possibly be done to our students. Haven't they been through enough these past two years? I am outraged, as I know every student, parent, teacher, and administrator in Montana would also be if they knew about this. What is going on? Our students desperately need all of these programs, now more than ever. Please, please listen to students, parents, teachers, and administrators on this subject before this goes any further!

Mrs. Jeanne Brist

Whitefish Middle School

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Hello. I am writing to submit public comment on the proposed changes to school requirements. I must STRONGLY oppose these changes proposed by the superintendent of public instruction.

Allow me to touch on a few points that I find the most troublesome. Striking the requirements for library and counselor FTE would be detrimental to our students. Access to books and research opportunities through the library would be severely diminished if schools were not required to have certain librarian FTE present. This would disproportionately impact our rural students, who make up a significant percentage of Montana students. And currently our students are in the thick of a mental health crisis. Reducing counseling FTE would only hurt them more and create a bigger crisis in the future. OPI should consider ADDING to the counseling FTE, not taking it away in a time like this.

Striking the language that requires schools to offer specific electives is another area that causes me great concern. Getting rid of the requirement to offer such electives as creative arts, music, foreign languages and career and technical arts is simply asinine. Our students need creative outlets, now more than ever. The world at large keeps saying 'we need creative thinkers for the future'. How can we, as educators, justify cutting the creative portions of our curriculum when the world so desperately needs creative thinkers? I realize that this proposed language doesn't specifically 'cut' these areas, but by removing the mandate, it will open the door for schools to remove these programs at will, taking away opportunities that our students should have easy access to.

Our students are also in a socio-emotional crisis. They have lost the ability to interact with their peers, mostly due to the pandemic. Removing the mandate for such socio-emotional supports as counseling and music makes absolutely no sense for our kids. We need to support them and give them outlets to re-learn how to conduct these interpersonal interactions. Counseling and music provide these opportunities naturally. The arts are why many students come to school. They don't come because they love math, they come to school because they love music, or art, or ag. Removing the requirement to provide these services will, again, open the door for schools to cut these programs at will.

In closing, these proposed changes are not going to help students. They are going to hurt our already hurting student population. These proposed changes have the serious potential to undermine the quality of public education in Montana and I would certainly hope that the superintendent's office would be opposed to such a thing. Sitting students in front of a computer is not the answer. I implore you, do not approve these language changes. OPI should be standing up for our students, not putting up roadblocks in their educational journey.

Thank you,

Jennifer Skogley

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Without counseling and library services, our students would not be able to get appropriate mental health services and/or have access to reading material. As a teacher at a middle school, I could not do my job without the support of our guidance counselors; especially after the pandemic. Supt. Arntzen's recommendation eliminates the ratio, eliminating Montana students' access to school librarians. This recommendation unfairly targets rural students. In addition, her recommendation eliminates the ratio, eliminating Montana students' access to school counselors. This recommendation unfairly targets rural students. Please vote to maintain the librarian and counselor ratios.

Thanks for your consideration,

Jennifer Urbach

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am a third grade public school teacher and I see how much librarians and counselors make a difference to our students every day. It's important not to cut these programs or cut the staff ratios that are already in place for them.

Student learning and health is our first priority, and cutting these ratios does not support our goal of educating healthy students.

I support keeping the ratios we currently have in place.

Jody Branting

Educator, Helena, MT

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I am writing to you today in regards to the proposed OPI changes to school librarians, counselors and possibly changes to requirements in art, career/tech and music. As a high school teacher and a mom to three little kids, I am extremely troubled and concerned about these proposed changes. Counselors and librarians are invaluable resources to our schools and students. The work they do to raise children up academically and emotionally often go unseen but are imperative to student success. Librarians and libraries are a place where students can go to get extra help, find books of interest, grow their imagination and enhance their reading skills. Additionally, the library is often where kids find a safe place of comfort.

Arts and music stimulate an important part of a child's developing brain and for many students, provides a reason to attend school. When children engage in rigorous academic learning at school, arts and music provide a release and relaxing of their brain. Ask any child what their favorite part of the day is and it is usually art, music or P.E. Library day is also high up there on their list of favorites. Removing these things from the school day would be detrimental to our children.

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I am extremely disappointed that OPI would even propose these changes and am holding out hope that they will not pass.

Thank you for your time.

Best,

Josie Hudspeth

Instructional Student Support/Remote Learning

Student Council Advisor

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Please retain librarian and counselor ratios. With children's mental health challenges on the steep increase, these minimal standards are already low.

Thank you

Julie Parker, Missoula

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The past three years have been unprecedented in public education. The pandemic stretched educators to the max. Being sent home and providing online instruction and then navigating last year with students in uncharted territory has created high levels of anxiety and isolation. You may not realize it, but students and staff in classrooms across America ARE NOT OKAY!

Proposing one councilor for 400 students in k-8 is absurd, we need more not less. Each school needs a counselor on site. Do not lessen the safety net for our kids when more and more students are falling through the holes. Step up the support not minimize it. WE NEED MENTAL HEALTH HELP.

Sincerely,

Kate Belinda

Educator

Red Lodge, Montana

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Please, I beg of you, keep school counselors fulltime in our schools [REDACTED]

[REDACTED] And yet, she tells me repeatedly that she is not able to get to all of the students who need mental health support. She does the best she can but there are never enough hours in the day. She is the sole counselor for this program.

Especially in this difficult time, coming out of the pandemic, financial challenges in our country, racial upheaval, and more and more challenging homelives, our students deserve to have a mental health professional available to them in their schools.

Please keep counselors in our schools!

Kind regards,

Kathryn Manfull

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As a concerned social worker currently working with school-age children with anxiety, depression, and trauma I am reaching out to you to encourage you to please vote against Supt. Arntzen's recommendations to cut down on school counselors. We are already experiencing a mental health crisis with our youth and this will just make things worse, leading to more burnout of mental health professionals and the continued emotional neglect of our youth. Following the pandemic, I can't think of a worse time to implement changes like this. Please do the children and your mental health professionals a favor by voting against these changes.

Best,

I sat down at the beginning of the school day to draft this but was interrupted numerous times because of students that are struggling. A couple students just wanted a check in and a couple were concerned about events that transpired at home the night before, these were things that I fit into my already tight schedule because they took precedence.

I am writing to you on behalf of Superintendent Arntzen recommendation to eliminate the school counselor to student ratio (language cited below). Reading this felt like a punch to the stomach. My name is Kerry Weigle,

I have been an elementary school counselor for the past 11 years. I love my job but like any job it comes with its stressors. I have experienced those stressors ten-fold as a result of the pandemic and the added stress it has put on families. I could not be happier to be back in school this year with my students. As we began to reestablish relationships and a sense of normalcy the students began to talk about what they had experienced over the last two years. We are in the height of a mental health crisis and the last thing we need is to limit their access to support. What good can come of this? I am not advocating for myself, as much as I am giving the 423 students that I work with a voice, I see their pain and struggles. I have lost one of my students to suicide, it is something that I constantly struggle with and something I never want to relive which I fear what will happen if we take away our students mental health supports.

I would welcome a conversation to talk in greater detail, honestly I am finding it difficult to process, I am feeling hurt and under-valued, but it's not about me its about my 423 students.

Please add me to the zoom meeting as I would love to be a part of the conversation

Sincerely,

Kerry Weigle

2. **School Counseling Staff**, 10.55.710 currently requires a minimum equivalent of one full-time counselor for each 400 K-8 student and a minimum of one full-time counselor for each 400 high school students with this ratio to be prorated. School districts with fewer than 126 students may employ or contract or use a consortium, multidistrict agreement, or interlocal cooperative to secure counseling services. *Supt. Arntzen's recommendation eliminates the ratio, eliminating Montana students' access to school counselors. This recommendation unfairly targets rural students.*

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As a double Master level School Counselor who has worked in education over two decades in the public schools and supported education long before that as a professional counselor in community fields for another two decades, I am deeply concerned that anyone would consider dropping so many of the criteria for both school counselors and librarians. IN addition, I now see that any education supporting "elective offerings" is also on the proposed changes lists from Superintendent Arntzen.

I strongly urge you to decline these proposed changes and to reevaluate what it is we are wanting to teach our future leaders (students) in public schools. Our national and state associations provide us with guidelines to follow regarding caseloads or students served in both areas. ASCA, the national association for school counselors recommends a ratio of 250:1 school counselor in each school. At 400 in the state of Montana, we are already well above that. No regular classroom would ever be more than 25-29 students without another adult supporting that class, yet we ask professionals with specialized training to maintain serving students in these large numbers with efficacy without blinking an eye.

Our school counseling services are available for all students in the three domain areas of career, personal/social and academics. It is a well rounded program that addresses all needs for each student

individually. Elinating any one area we cover, specifically career and technical education does not make sense. Every employment opportunity has a need for this education as we continue to go into a technologically based world. In addition, school counselors are the school's students first tier of service providers for students who may be emotionally dysregulated, offering this special trained service also. There is not a substitute for a school counselor. There is not another area where training is extensive in this area within the school either. Offering OPI waivers for rural schools supersedes the whole purpose of having qualified, Master level school counselors serving these students successfully. Decreasing the students' ability to have access to qualified, Master level school counselors is a mistake. We visited this with the last revision to Chapter 55...a committee I was chosen to serve on. I strongly encourage you to decline accepting Supt. Arntzen's recommendations to eliminate the ratio, which is already too high, eliminate access to school counselors. I also urge you to rethink the elimination of any of the library ratios or access to the arts.

Sincerely yours,

Kristy Savaria

South and Graff School Counselor

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I am writing to express my opinion regarding the possible changes to the accreditation standards. It is not wise to limit student access to school counselors during a time when we need more support for students than ever before. Removing the ratios will mean some districts will not make it a priority to have school counselors, and student emotional wellness will struggle as a result.

Montana is already behind in making School Counselor services a priority, with a 400:1 ratio. The ASCA National Model recommends a 250:1 ratio. If we remove all guidelines for accreditation, we slide farther down the line of promoting student emotional and mental wellness. As a state that often tops the list for deaths by suicide, how can this even be considered as a choice for Montana students. It is embarrassing and shameful that removing counselor ratios is even being considered, let alone the possible decrease in library, art, music and other creative outlets.

Please do not accept the recommendations for accreditation from Elsie Arntzen.

Lacy Eccles

**Lacy Eccles**

School Counselor

Whitefish Middle School

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As a school counselor in the Bitterroot Valley for the last decade, I am very disheartened and disappointed to see the current recommendations put forth by Superintendent Arntzen in all curricular areas, but **specifically school counseling**. Since well before the pandemic there has been a overwhelming need for responsive and preventative school counseling and mental health services for some of our most vulnerable populations in schools. Ms. Arntzen knows this and has said as much, even asking Renee' Schoening, Executive Director of the MT School Counselor Association, to gather a team to create a [video focusing on the importance of Social and Emotional Learning \[youtube.com\]](https://www.youtube.com/watch?v=JyfJyfJyfJy) for the MT-OPI YouTube Channel.

In many rural communities, school counselors are often the lone resource families have for accessing mental health support. To increase our caseloads, or potentially eliminate positions all together is a disastrous idea, and those set to suffer most are the Montana students and families we serve in our districts.

- [The American School Counselor Association recommends a school counseling ratio of 1:250 \[schoolcounselor.org\]](http://schoolcounselor.org), with Montana well behind this at 1:400.
- Reject this proposal, put action to the increased calls for mental health access, and move toward improving the OPI ratio for school counselors to 1:300.

I plan to attend Negotiated Rule Making Committee Meeting at 3:30pm on Wednesday, May 18<sup>th</sup>, 2022. **Please send me the link** at your earliest convenience. Thank you!

Respectfully,

Lee Starck, M.Ed., NCC

Corvallis Primary School Counseling Program

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I am writing on behalf of all the counselors in our school district! You ABSOLUTELY can not get rid of or even cut back!! Our children depend on them as well as parents!! I see children at a very young age because I own a daycare here in Billings, and I can tell you without a doubt we have a huge problem coming up with this next generation! They are going to need counseling more than I've ever seen in the past 38 plus years!! Do not jeopardize our children's welfare!! Please contact me if you have any questions!!

Linda Thomas

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I am a counselor in Billings, MT and we have so many kids with mental health issues who need a lot of help. Montana has one of the highest suicide rates in the nations with teens and it would be unwise to cut funding to counseling.

Lisa Matovich Brooke

Counselor and Life Coach

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I am contacting you in regards to the proposed changes that Mrs. Arntzen wants to make to the Montana school accreditation standards.

As I am sure you know, the United States and Montana are in the middle of a mental health crisis that is also affecting Montana's youth. To restrict students' access to a school counselor is unconscionable. I am a teacher in a school that would be affected and I can tell you the teachers, principals, students, and families rely on our school counselor immensely. Her work is invaluable to our school community and we would suffer greatly if we did not have access to her full time.

Additionally, our Librarian is one of our most important school staff members. In a digital world, the digital citizenship she teaches to our students is of the utmost importance to keep their digital identities safe. She is also the gatekeeper to authentic literature and helps our students access it and encourage their love of reading. Again, our school would suffer greatly without full-time access to our librarian.

I wholeheartedly urge Mrs. Arntzen to rethink the changes. Do not make these changes.

Thanks so much!

-Lori Rovero

4th Grade

State educational accreditation standards exist for many important reasons, not the least of which is to ensure that school districts budget their limited resources in ways that best serve the interests of all students. When budgets are tight, districts face hard choices about making cuts or stretching existing resources farther. The accreditation standards for school counseling ratios create a firm threshold that ensures that school districts do not stretch their school counseling staff so thin that it becomes exceptionally ineffectual.

The existing accreditation standard of 400:1 is already anachronistic for the needs of today's children and youth. The American School Counseling Association recommends a ratio of 250:1, which reflects the increased mental health and social/emotional roles that modern professional school counselors play in today's schools. Removing a mandated ratio entirely from the accreditation standards would open the gates for school districts to sacrifice the effectiveness of this critical service when trying to balance budgets or prioritize staffing decisions.

While there may be compelling reasons for removing this requirement from the accreditation standards, the harm that this proposed change would also bring in its wake concerns me greatly. I urge the committee and the superintendent to please reconsider this proposal and to search for alternative methods to achieve whatever goals prompted consideration of this change.

Lyon Virostko

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Dear Tristen, I live in a rural school district (Arlee). We are all hearing about our childrens' mental health crisis. Why would we want to eliminate mental health access for our kids? Why would we reduce the number of librarians that so enrich our childrens' educational experience?

Mary Stranahan

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NAMI Montana has significant concerns about the Office of Public Instruction requested elimination of functional staffing ratios for school counselors in Montana schools. Montana's youth are undergoing significant mental health issues at high ratios. This is not the time to make it harder for them to access school counselors.

These threatened cuts come amidst a [national struggle in youth mental health \[thehill.com\]](https://thehill.com). Montana families are living this struggle. As described by the [Independent Record \[helenair.com\]](https://helenair.com), the 2020 Youth Risk Behavior Survey for Montana "found the highest rate of students ever to report feeling so sad or hopeless for two or more weeks in a row that they stopped doing usual activities, a metric researchers say is a symptom of depression."

### **School Counseling Staff Recommended Ratio Cut**

10.55.710 currently requires a minimum equivalent of one full-time counselor for each 400 K-8 student and a minimum of one full-time counselor for each 400 high school students with this ratio to be prorated. School districts with fewer than 126 students may employ or contract or use a consortium, multi-district agreement, or interlocal cooperative to secure counseling services.

The Office of Public Instruction's recommendation eliminates the ratio and therefore makes it less likely that Montana youth will be able to access school counselors who have a functional caseload. This is a horrible time to make it harder for Montana kids to access a school counselor.

NAMI Montana respectfully requests that the Negotiated Rule Making Committee vote against the elimination of school counselor ratios.

Thank you,

Matt

Matt Kuntz, J.D.

Executive Director

NAMI Montana

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On behalf of Missoula County Public School's Counselor Leadership Team, we are writing our opposition to Superintendent Artnzen's recommendation to eliminate the school counselor ratio. The current Montana ratio required is 1 school counselor to every 400 students which is much higher than the national recommendation of 1 school counselor to every 250 students (ASCA, 2020). In fact, states, such as Delaware, are currently lowering their ratios to 1:250. Eliminating the ratio would be a step backwards in meeting the needs of our students and staff and eliminate access to mental health, especially for rural areas.

Data reinforces the need for more mental health in the schools and many of our nation's leaders support that fact. Secretary of Education, Miguel Cardona, stated in May 2022 that, "diversifying the teacher workforce, adding additional social workers and counselors, and providing additional resources to under-resourced areas are just a few ways we can ensure our schools are on the path to success no matter what community they are in." The American School Counseling Association states: "Students' unmet mental health needs pose barriers to learning and development. Because of school counselors' training and position, they are uniquely qualified to provide instruction, appraisal and advice and short-term counseling to students and referral services to students and their families. School Counselors provide a school counseling program designed to meet the developmental needs of all students."

Now, more than ever, the role of the school counselor is imperative to the health of our youth. Since COVID 19, we have seen a significant increase in students' mental health challenges and our school counselors are often the first line of support and access to interventions. A recent American School Counselor Association publication highlighted that in year two of the pandemic, school counselors continue to meet challenge after challenge, and address crisis after crisis. Mental health crises are also on the rise. From March 2020 to October 2020, mental health-related emergency department visits increased 24% for children ages 5 to 11 and 31% for those ages 12 to 17 compared with 2019 emergency department visits, according to CDC data. A [national survey \[americaspromise.org\]](https://www.americaspromise.org) of 3,300 high schoolers conducted in spring 2020 found close to a third of students felt unhappy and depressed much more than usual.

The pandemic has also exacerbated existing disparities in mental health services. A 2020 [technical report \[umb.edu\]](https://www.umb.edu) from the University of Massachusetts Boston and University of Massachusetts Amherst found that students who needed access to school-based services the most, particularly those with lower socioeconomic backgrounds, had lower rates of counselors and school psychologists in their districts. The school counselor's role has shifted to become more reactive and our school counselors are functioning in a state of crisis often doing triage work, while still trying to do classroom guidance, run small groups and perform other school counseling tasks.

The pandemic also illustrated the importance of mental health. Teachers and school administration turned to school counselors to draw on their much-needed expertise in fostering wellness and mental health, and they realized the pivotal and skilled role school counselors play in a school community. The downside, however, is that many school counselors are now constantly "on demand" by both school colleagues and parents, which has led to them being overworked and, in some cases, burned out.

We appreciate your consideration for not only keeping the ratio requirement but for lowering our school counselor to student ratios to 250:1. We thank you for all you do for Montana youth and for supporting our educators and mental health professionals who are on the front line everyday.

Sincerely,

Missoula County Public School's Counseling Leadership Team

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Heather Williams, M.S., Ed.S.

She/Her/Hers

Counselor for Class of 2022

Big Sky High School

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As a retired elementary guidance counselor, I am appalled that our Supt. of Public Schools would even think of recommending changes of this kind to school guidance and counseling programs and accreditation standards. Why would anyone want to decimate a program that provides a ground-floor of services for success for students?

Let me give you some examples of professional experiences during my 18 year career that illustrate our role in nurturing children and providing services to ensure their success by being Healthy, Happy and Safe:

1. When I came to work on a Monday morning, a third grade student had made a self referral saying: "I hate my life!" "Please come get me Ms. Schaefer."

Of course, I immediately responded. We talked, wrote a safety contract, his parents were contacted, and he then met with outside the school professionals. This student continued to meet with me once a week in a small group setting or individually as needed for his success, confidence and safety.

This young person is now in his late 20's and is highly successful. We communicate often with genuine heartfelt feelings: His with gratefulness and mine with joy.

I ask you, "What might have happened to this third grade student had there not been a trusted connection with a guidance counselor and with whom he was able to say: "Ms. Schaefer, I hate my Life?"

Think about that for just a moment. What if that were your child?

2. Several years ago, a young man was taking my groceries out to my car with me. As we walked, he said to me: "You're Ms. Schaefer right?" I said, "Yes." And he said: "I want to thank you. You saved my life in fourth grade."

At that moment, I realized who he was. He had been a new student in my school and his parents were going through a divorce. He continued the conversation by saying that his life was so much better because I had taken the necessary steps to make sure he was safe and to get the help he needed. He maintained our bond by attending a small divorce group.

Again, I ask, "What might have happened to this young person without the services of someone he trusted, someone to confide in who would get the help he needed?"

Think about that for a moment. What if that were your child?

3. On a Saturday morning, I received a phone call from a Mom who was in tears. Previously, I had spoken with she and her husband regarding their son's learning difficulties. He had come to me saying school was hard. In addition, he was having behavior issues at home. We discussed contacting their pediatrician about the possibility of having their son tested for ADHD. The test was positive and they chose to start him on medication.

Her phone call came on the first day of his taking medication. That phone call was filled with tears of joy and thankfulness. Their son that morning, sat down and did his homework and Saturday chores without any battles or behavior issues. His grades went from C's and D's to almost straight A's.

I often think about what might have happened to him had he not trusted me with his thoughts about "School is Hard."

Think about that. What if that had been your child?

My job as an elementary guidance counselor was to help kids to be Healthy, Happy and Safe. Three keys to successful learning...to make sure they weren't hungry, or give them help after just trying to survive the previous night. Counselors provide a safe, trusted environment where students know they are loved and liked. We teach curriculum, we run small groups, we support parents, staff administrators and our communities.

We are parents too. And I ask myself: "What if that was my Child? Would I have been thankful, too, that my Child had another trusted adult in their life that they could confide in? One that someday might hear: "You saved my Life."

I truly would have been beyond grateful to my school district for providing all resources for my child to be Healthy, Happy and Safe.

I ask you, please do not support the current guidance and counseling staff recommendations by Ms. Arntzen. They are destructive to a child's potential for success and safety.

Thank you.

Sincerely

Phyllis J. Schaefer

Retired GFPS Elementary Guidance Counselor

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I understand that you will be meeting today and discussing potential changes to the accreditation standards. I also understand that the committee and Superintendent Arntzen are proposing some changes that include

removing the FTE requirements for library media specialists and altering language for music/arts programs. I recently moved back into teaching after 15 years as a principal/assistant principal in Corvallis. During my time leading our middle school, I saw first-hand just how essential our library media specialist and school counselors are to raising student achievement throughout our building.

Our middle school students, overall, love to read, and this love of reading has been sparked in large part because of the work our librarian does every day. The library is a central place in our school for reading, research, and STEAM making & tinkering activities. This would NOT be possible without a dedicated librarian in our school. If you remove the part of the standards requiring a full-time librarian in schools, I am certain that you will be (unintentionally) committing to lowering ELA standards for students across the state.

Our counselors, also provide the support needed so that ALL students feel safe in our building. They work proactively to eliminate major problems before they occur. Because of our counselors, I can confidently say that there were fewer major disciplinary issues for me to deal with when I was principal. Their work is a critical component to getting kids to school each morning, keeping them in their classes, and solving student conflicts before they escalate. We have students who would not come to school without the support our counselors provide periodically each day through check-ins and relationship building. Our counselors are in a very real way tied to the academic success of many of our students. If anything, we have seen an increasing need for counseling services, not a decreasing need. Please reconsider any standard adjustments that would reduce the school counselors in our schools throughout Montana.

I understand that budgets are tight everywhere, and tough decisions need to be made about programs that are essential in public schools. However, I cannot stress enough how important our school counselors and library/media specialists have been to the overall success of our school. We will not be effective at raising achievement in core classes without strong school-wide counseling and library/media support positions. Please do not relax these standards. It will have a negative overall impact on Montana students.

Thank you for considering my input,

Rich Durgin, 8th Grade Science Teacher

Corvallis Middle School

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I don't understand why the changes to 10.55.710 are being proposed during a time when students are struggling more than ever. If anything we need more counselors, not less. Please reject the proposed changes.

Thank you,

Robin Pleninger

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School districts need MORE access to counselor's and not less! Our students are desperately anxious and need social and emotional help that teachers do not have the time to offer. Do not let Arntzen to remove the required ration of counselors. Our students will suffer!

Taking away any options for electives provided for students will be a detriment to our students. Do not take away the musical offerings or the electives that lead students into career and technological offerings!



Shawna Wright

## Bozeman High School Science Teacher

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Having taught children for 38 years (Montana schools for 29 years), I am very aware of the necessity for adequate library staff and counseling staff. During this pandemic period especially, our students have significant needs that will NOT be met if that staff is not supported and encouraged. The current student/staff ratios have to be upheld and strengthened.

School librarians are invaluable in helping students gain and maintain access to information, as well as helping them with technological difficulties.

Further, as a CASA volunteer, with the implementation of the federal Families First Act, we have seen a dramatic reduction in the number of cases we CASA are involved in. And with the pandemic, we know the number of children subject to abuse and neglect has not fallen; many have not been reported and with a few exceptions, CPS has not moved further than investigation. The school counselors have an increased workload because these children need help.

I appreciate your support in helping keep our student support standards high.

Sincerely,

Steven P. Smith

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As a retired teacher with 40 years experience in Montana schools, I can't believe that reducing the number of librarians and counselors is even being considered. When I first began teaching, we were not lucky enough to have a counselor or a librarian. So I can testify to the tremendous difference it made in the lives of the teachers and the students, when those additions were made to the staff. I feel like we are starting to go backwards. Please reconsider.

Sue Roth

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I have been a school counselor in Montana for 24 years. I am currently working at Kalispell Middle School with School District 5. I have 372 7th grade students in my caseload. Through my duties I also serve their 30 teacher, as well as the student's parents.

Last year, when I was 6th grade counselor [REDACTED]

[REDACTED] I have been working hard, losing sleep trying to support these students and my colleagues.

[REDACTED] On average, during the first 5 months of school I was completing Safety Risk Screenings with 3-5 students a week. Most of my students at the time were 12 years old, some are now 13. When a person struggles with suicidal thoughts and receives treatment, research shows that the thoughts just don't go away. Typically it takes consistent follow through using a Safety Plan, asking the necessary questions to determine risk while receiving medicinal and therapy provided by trained clinical therapists. Sadly, funding for our community mental health services continue to be cut by the legislatures. Most of our local clinical therapists are not accepting new clients, or have "waitlists". This means that the schools, ie, school counselors, are often responsible for trying to serve these students struggling with life threatening issue of suicide ideation.

Our school district has been in the middle of a suicide cluster this year. Our state has been in the top 5 for suicide the past 40 years. We have worked diligently to try to follow the recommended best practices in suicide prevention and response and yet here we are, scrambling to do whatever we can to try and save the lives of young people. Sadly, our efforts seemed to have failed a dozen of our students, recent graduates, and their parents this year. We are haunted by these stories, by our shortcomings, our what if scenarios. [REDACTED]

[REDACTED]. Our teachers, parents, and community are struggling with secondary trauma from these deaths. Survivors of Suicide Loss are eight times more at risk of suicide ideation.

I cannot believe our state superintendent, OPI, and members of this committee are considering cutting qualifications for school counselors and eliminating ratios. It takes highly trained and skilled school counselors to fulfill the responsibilities of our jobs. We really do save lives. Please do not increase our school counselor student ratios or eliminate qualifications.

Sincerely,

*Susan Sherman, MA*

School Counselor

Kalispell Middle School

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I want to state my strong opposition to the proposed change to the accreditation standards eliminating ratios for both the school librarian and the school counselor. All students should have access to both of those services. As a school counselor I have students that come in and say they want to die or that their mom is beating them. I do guidance lessons with elementary and educate high schoolers on being college and career ready along with a long list of other duties. Teachers and administrators look at me (and our librarian) as pieces to be used to fill in the gaps in their teacher's schedules. Only by having a ratio at the current level or below that (as in the ASCA recommended 1 counselor for each 250 students) can we ensure that we are used in the appropriate manner and not pushed into being teachers. By pushing us into teaching positions that reduces the access our students have to the counseling services they need. While it may be true that in a smaller school we don't have as many students that need us it only takes one student one period of the day to need a counselor. If we are not available when a student is feeling suicidal we miss that chance to save the students life. We must maintain school counselors at their current level. we are not extras or fill ins. We are vital to our schools, our communities and the state of Montana.

Thank you,

Terry Harris, School Counselor

West Yellowstone MT

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I'm writing to you today because I am a school counselor advocating for school counselors in the state of Montana.

I am the 5-8 School Counselor for Manhattan Middle School. I am .8 with roughly 250 students. We currently have a full time school counselor in the elementary **AND** high school, as well as a full time school psychologist. Last year I was .4 working 4-half days per week. Last summer my district sent out a survey asking our community what they are needing in the schools to support students moving forward. The voice of the community shared: **add more time to the middle school counselor position**. The district listened to the voices of the community and brought me on double using some of the covid relief monies that will run out in next school year.

My position should be full-time. The majority of my day-to-day is working with students dealing with family changes, anxiety, depression, suicidal ideations, working with parents and stake holders to find resources as supporting these needs, plus bring social competencies into the 5-8 classrooms.

**Please hear me when I say, I would LOVE to see a change in the ratio to the National recommendation of 250:1 and recommend that the ratio remain in the accreditation standards. Please don't take it out. There is SUCH A NEED for the position of a SCHOOL COUNSELOR. We are student advocates, parent advocates and partner with staff and administration.**

Kind Regards,

Tracy Grabowska

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Here is my public comment for the meeting schedule on May 18th. Thank you!

To the School Quality Task Force Members:

It was shared that this group is looking at changing the staffing requirements and ratios for school librarians, counselors, and many other groups. My main concern and the reason for this email today is the idea that a school, let alone a district, can function without the valuable skills, teachings, and work done by school librarians every single day. Not only do they function as classroom teachers by teaching lessons, research skills and technology-based work, but they provide support for so many other areas in schools that can't be replaced. My school librarian is a valuable member of the Bryant School community and one who goes above and beyond what is asked of her every single day. She puts her heart and soul into teaching and for that, we have students who find a true passion in reading and growing as learners. While I have tremendous paraprofessionals in my building, they can't replace what a licensed teacher can do. Please consider what you are proposing and listen to the people who are in the trenches and working to ensure that each child is a life-long learner. Thank you for listening!

Trish Klock

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Please do not vote to remove ratio requirements for librarians and school counselors. These professionals are so vital and it would be unacceptable for students to lose the already limited time they get with them.

Thank you,

Velita Rholl

High school teacher at Hellgate High School

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I am horrified at the fact that our Superintendent of Public Instruction is destroying the public school system. The fact that she thinks it's okay to eliminate the ratio for a school counselor is irresponsible, and inconceivable in this day in age to discount the work of our counselors. The students of today need more support than ever. I think that the case loads of our school counselors should be even lower than they currently are. I hope with all my heart that you don't change the School Counseling Staff 10.55.710. Do not eliminate the ratio.

I am also disgusted at the fact that our Superintendent of Public Instruction is also recommending elimination of specific elective programs, and credit requirements in the middle schools. This would prevent student access to music, visual arts, career education and many other courses. Students that are struggling in school need these electives to keep them in school. If you take them away, then they too may go away. At that point what will our society look like?

Please do not hack away at the accreditation standards of our Middle Schools.

I would also like to be sent the link for the Zoom meeting.

Vicki Motley

2<sup>nd</sup> Grade Teacher

Stevensville Primary School

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To Whom It May Concern,

Please support Montana School Counselors by:

Supporting our national association's student to counselor ration of 250:1. Our ratio next Fall in Livingston will be 330+:1.

Keeping the student to counselor ratio in the accreditation standards.

Understand that education is facing a shortfall of professionals across the board. With increased mental health needs of students affected by COVID, lack of family support, inappropriate access to technology outside of school and a lack of governmental funding are contributing factors for leaving the school counseling profession.

School counselors have multi-faceted jobs. We teach social/emotional, academic and career lessons to all students. We offer students 1:1 support, group counseling, act as liaisons for academic support between home and school, write grants, ask for donations for school supplies for students in need, and countless other services. Support students by supporting funding for more school counselors.

Sincerely,

Ann Gannon

Sleeping Giant Middle School Counselor

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Please retain current standard for the LIBRIANA AND COUNSELORS in Montana schools. The school often the only source for counseling in rural areas. The school Librarian and the school library is essential for guided reading in all schools.

I am writing to you to plead with you not to reduce counselor ratios. Now more than ever we need to provide more..not less..help to our kids who may be struggling with sadness and mental health issues. It is imperative that these kids get our support and cutting that support is unconscionable! Please, please consider maintaining or increasing the librarian and counselor ratios.

Thank you for your time. A concerned MT citizen.

Deona Miller

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(This applies to librarians too)

We have, in Montana, excessive suicides. This applies to both adult and youth suicide.

Part of this stems from a lack of access to mental health professionals. Schools are often the only place our rural communities actually have formal mental health professionals.

While the current administration pays lip service to addressing this problem, the true action is almost always to reduce or even eliminate access.

I strongly oppose reducing the number of mental health professionals in the schools. In fact, in most places, adding would be better.

As I said, the same applies to librarians.

And teachers.

Pattydenke

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I am a custodian at SMS. The librarians and councilors are some of the busiest people in the school. Every year the "challenging kids" become a larger group. The kids using the library keep the librarians hopping, as well as learning in their classes. If we lessen these valuable peoples spots who will do the work? Will we lose more teachers to stress? We are already short on paraprofessionals as no one can live in Bozeman and work at that wage.

Thanks,

Kehoe, Thomas

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As a high school English teacher and now gifted education coordinator, am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely, Hilary Klug

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Please maintain the librarian and counselor ratios. In fact, if anything is to change, there needs to be more librarians and counselors in schools. Haven't students been through enough these last few years? These possible changes may jeopardize the wellbeing and progress of students, so let's not start taking away their resources now. We all know that reading is a critical foundation for learning and for writing. Librarians can be seen as key resources to students, schools, and the community. Having access to information and being encouraged to read will help students be better prepared for life, which is a goal of education. We need all of the librarians we can get! As someone who lives with a mood disorder and PTSD, I cannot begin to tell you how important it is for counselors to be available in schools. May is Mental Health Awareness Month, so think about it! Counselors are a first line of defense for students dealing with a range of issues, for schools, and for the community. A qualified counselor may be the person who identifies a student who may hurt herself/himself or who may pose a threat to others, as in the case of a school shooter. Why would anyone seek to get rid of a school counselor, when they help provide some additional safety in these difficult times? Okay Let's not just talk about improving mental health, let's make sure the resources are available. If anything, we need more librarians and counselors, not less. If you are serious about students being educated, capable, and prepared for the future, please do not change the ratios or cut back on the number of librarians and counselors. Montana

will not "keep up" if you are not willing to insure adequate personnel and resources for education. Thank you,  
Connie Rhoads, Bozeman, Montana

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I strongly disagree with eliminating librarian and counselor ratios for our schools. The current ratios provide a minimum standard of instruction and services to Montana students. Some districts may opt to add more professionals, but I think it is important to guarantee our students access to instruction provided by these professionals. Removing the minimums means students' educational access will become purely politically and monetarily driven. The Montana Library standards were updated in 2021. The standards include instruction on thinking critically, working with others, sharing resources, and demonstrating safe and legal use of source materials. These standards require instruction from a professional with specialized training. Further, these standards require adequate time for students to fully acquire the skills. Reducing librarian to student ratios ensures that some students will miss out on this important instruction. Today, information is constantly bombarding us as adults, it is sometimes difficult to find the true source of information and understand the biases from that source. Our students, our children, also face this onslaught of information. Library skills teaches students how to sift through the pile of information to find relevant and factual content and recognize the biases within that information. Now is not the time to strip this education from our students. The full Library Standards are located on the Office of Public Instruction website at:

<https://opi.mt.gov/LinkClick.aspx?fileticket=kqne7aNylHg%3d&portalid=182> Students are in mental health crisis; depriving students of mental health services will not improve student learning. This mental health crisis pre-dates the pandemic as students face more trauma and greater access to unfiltered content on social media. However, the pandemic has also increased emotional needs of our students. Removing or reducing school counselor access will negatively impact the schools' ability to help students become productive members of our society. Finally, middle school electives and minimum standards for core instruction are imperative for creating a well-rounded society. While many may look back at their middle school days wondering what happened, a more thorough recollection likely will resurface memories of that first cooking project in consumer science, building a bridge in tech shop, dabbling with clay in art, stumbling over new sounds with a new language or taking those first breaths to learn an instrument. Middle school students are in an age of exploration and the current requirements ensure that students have opportunities to explore a variety of talents and interests as they navigate through this awkward age and eventually emerge as adults. I urge you to maintain current guidelines and maintain parity in education for all students across the state. Thank you for your time. Joice Franzen Helena, MT

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I am beyond disheartened this morning to learn of Superintendent Elsie Arntzen's proposed changes, specifically to how it effects the ratio of School Counselor's to student requirements. Most alarming is these proposals are coming at a time when School Counselor's are needed the most. To say this has been a challenging year coming out of the pandemic is a drastic understatement! The social/emotional impact and traumatization the pandemic has had on child & adolescent development is truly alarming. As 1 of (2) School Counselor's in a Title School of approximately 720 students, it is beyond a full-time job virtually everyday trying to get the needs of my students met. To effectively do the job correctly, and implement an entire School Counseling program, we really need an additional FTE School Counselor, not less. Respectfully, Kevin Flatow School Counselor (6th grade & A-L 8<sup>th</sup> grade)  
Helena Middle School

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I am concerned with the direction some of the proposed changes to elementary and middle school requirements are heading. Librarians and counselors are a critical component of student success and support. I would like to see the language tying the number of FTE's to student enrollment numbers remain as a safety guard for having adequate staffing in these vital areas. Another area of concern is the move away

from requiring electives like music, art, technical ed, and foreign languages at the elementary and middle school levels. These kinds of classes are often the ones that keep at risk students involved and connected with school. If schools are not required to provide them, they will be cut when the first budget squeeze comes along. This will in turn have a negative impact on some of our students who are the most at risk for dropping out as they get older. We have to value the whole student experience of school, not just reduce school down to reading and math scores. Please do not weaken our ability to provide these important services and electives to our students.

Sincerely, Debra Beaver Smith Elementary

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I am emailing to address the proposed recommendations for accreditation standards. As a school counselor with direct contact with students, I can assure you that these proposed recommendations would be a tremendous detriment to our Montana students and will cause a great disservice to our communities.

First, the proposition will eliminate students' access to school counselors. Currently our ratios are set at 400:1, that is already exceeding best ethical practice set out by the American School Counselor Association which is set at 250:1. In larger districts we are already struggling to keep up with student needs and the demands of the position. The new proposition would ensure that school districts are only required to hire one school counselor per district and in smaller districts these counselors can be split among different districts sometimes in different areas. With these ratios, districts across Montana will lose qualified mental health experts and staff with experience. Throughout the COVID-19 pandemic, the message was sent loud and clear to us and our communities that our students' social emotional needs were not being met and their mental health was suffering. We have seen a large, and rapid increase in student needs in regards to mental health as well as behavioral issues. We are already struggling to keep up with these demands. By eliminating ratio requirements, this committee and the Montana Board of Public Education is saying that the mental health needs of students do not matter. School counselors will not be able to meet the needs of their students if these ratios are eliminated. Furthermore, school counselors are integral to the well being of students and to public education and our communities. If you haven't been in a public school recently, you might not know all of the duties that a school counselor performs. Just to name a few: school counselors provide individual counseling, small group counseling, and crisis response services. They aid students in developing personal goals and help to prepare them for future college or career aspirations. School counselors develop and implement core social emotional learning curriculum through classroom lessons. They make referrals for outside counseling and community assistance, consult with parents and school staff, and collaborate and share effective strategies that support students. They also collaborate with community members and organizations to provide the best support for students and their families and they assist community members and families in finding access to outreach assistance. As mandatory reporters, school counselors are on the front lines of recognizing and reporting child abuse. They also are usually the first qualified mental health professional on the case when working with students who want to hurt themselves or others and may even be suicidal. By eliminating ratios for school counselors, the board would effectively be eliminating school counseling positions and in effect, eliminating those services for many, many students across the state of Montana. If you think our students are in a mental health crisis now, wait until you eliminate the positions of qualified professionals. Please reconsider these recommendations, they do not reflect the needs of students or school staff across the state of Montana. Regards, Emily Hilliard school counselor, Helena MT

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I write to urge you to not recommend the changes Superintendent Arntz recommends for the librarians and counselors. There are many reasons, a few I will mention here. Access to books, a knowledge professional, and the standards librarians are required to teach: Librarians play a key role in schools and are necessary for all schools including our rural schools. Our need for school counselors has only increased with COVID. To cut this support seems to be the opposite direction we need to be going. Our kids deserve support, if not more

support. Please do not recommend the changes Superintendent Arntz is recommended. Thank you, Anna Puryear

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality (I've personally done 15 suicide assessments in K-5 this year alone), depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 370 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas who already have limited outside mental health support. Without adequate mental health support in our public schools, children cannot be expected to exceed academically. Without adequate mental health support in our public schools, our teachers cannot be expected to excel in their classrooms. Without adequate mental health support in our public schools, we as a state will be undeniably failing our Montana communities. The school counselor role is critical to the success of public schools, and maintaining the current state standard ratio ensures we can perform our role to the best of our abilities. I cannot, personally, see how this proposition is being made with the best interest of children in mind.

Sincerely, Paige Fallis, School Counselor

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I oppose Superintendent Elsie Arntzen's proposal to eliminate the ratio of students to school counselors. School counselors play an important role in schools in Montana. They help kids succeed in school, and graduate. Students need school counselors more than ever. Please don't threaten Montana's future generations by decreasing school counselors. Sincerely, Monica Roscoe

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It is imperative that minimum student counselor ratios be maintained. The minimum ratios are already inadequate. The need is great. The potential consequences are dire.  
Thank you. Holly Kaleczyc

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I am writing in regards to the proposed changes which would affect the ratios of school library media specialists and school counselors. If these ratios are eliminated, students will suffer, particularly students in rural parts of Montana. As a former youth librarian, I know the positive effect school librarians have on students. School librarians support literacy, encourage critical thinking skills, and provide spaces for children to thrive. As someone who works closely with young people, I have seen firsthand how much students have suffered, particularly in the past 2.5 years. To eliminate school counselor ratios, particularly right now, would be disastrous to Montana's youth.

I urge you to maintain these ratios to benefit Montana's students.  
Thank you, Laura Langberg Bozeman, MT

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It has come to my attention that there will be a meeting of the Chapter 55 – Negotiated Rule Making Committee on May 18, to discuss your suggested reduction in functional counselors and Librarians. I urge you to reconsider your proposal. The idea of a Supreme Being has been all but eliminated from our schools, and to now eliminate School Counselors or limit their numbers, would, in my opinion, place them in a no less dire situation than described in the classic movie “Lord of the Flies.” In which a group of cultured school boys were cut off from the outside world and became a group of savages. As an aside from the above, please send a link to the meeting, to me.

Sincerely, Quentin Johnson

I am writing because I am very concerned about a proposed rule change. I have understood that Elsie Arntzen is recommending the elimination of the school counselor ratio for schools. I believe the effect of this rule change will lead to a significant decrease in Montana students' access to school counselors. How can something like this be justified at a time when children's mental health needs have not been higher? How is this in line with the state's efforts for suicide prevention? I would hope the interested parties would consider relevant mental health data before taking such a step back from the current level of progress.

Cordially, Steve Ziegowsky Lewistown Jr. High Counselor

As a practicing educator, I'm extremely concerned with Superintendent Arntzen's recommended changes to Montana schools accreditation standards. I am writing to ask that you maintain the school counselor and librarian ratios, and preserve specific electives and credit requirements for middle schools. First, recommending that we eliminate the recommended ratio for school counseling staff is alarming. Right now, schools and communities are screaming for more mental health support for our students. We have students and families in crisis, and in Montana, we've sadly lost many of the services that provided support both in and out of schools. And the ultimate consequence for rural Montana schools could be devastating. I would echo this concern regarding the recommendation ratio for school librarians. School librarians provide so many duties that are integral to a highly functioning school. To do away with the ratio would be harmful to our students. Lastly, I question the recommendation to eliminate elective programs at middle school levels. To deny students access to fine arts, career education, world languages and other engaging and enriching curriculum is wrong. Again, please maintain the school counselor and librarian ratios, and preserve specific electives and credit requirements for middle schools. Jenny Molloy

Please retain all school counselors

help in the schools. Please reconsider.

Thank you Debra Beye

The kids need this

I am a Junior/Senior School Counselor in Central Montana. Geographically we are isolated from other school counselors, and additional mental health resources. I understand there are proposals to either provide no direction to school districts on the number of school counselors to students, or to remain at the 400 students to 1 school counselor ratio. I strongly oppose both of these recommendations b/c: a) school districts w/no direction from the state level may choose to not support a school counselor position in lieu of saving money (which would hurt students, families, faculty, and communities in rural districts), and b) being a 1st year school counselor in a school w/300+ students who is fortunate enough to have another school counselor intern on

staff and being in a district where we had to deal w/the death of a beloved student in the fall, I could not imagine having to handle the grief issues and surrounding concerns associated w/that type of traumatic event alone. Previously, I used to work in a Class C school and I was a part-time school counselor, part-time teacher. The total population K-12 was just over 100 kids. B/c of the needs of the students in the school, I could have been a full-time school counselor in a school w/a population of 110 kids. Rural school counselors not only handle mental health needs as they arise, but also deal w/family dysfunction, academic concerns, behavioral issues, and function as "pseudo administrators" when admin is called out of the building. In this capacity, it is easy to understand why many rural school counselors feel overwhelmed and that they are "islands" who are not connected professionally to support services available. Recently, at our statewide MSCA (Montana School Counselor Association) conference, I met a K-12 school counselor from Roundup and we had an opportunity to network w/her and other school counselors. By the end of the conference, I offered my contact info to her in support and she said that would be so helpful b/c she felt like she was alone working in a rural district. Currently, I am working in a high school w/over 300 students and we have dealt w/the following concerns this year: foreign exchange student transition and assimilation, death of a beloved student and resulting grief and anger issues, setting up and organizing a local college fair w/surrounding rural districts bussing in kids to attend the event, administering ACT and AP standardized tests, providing SOS (Signs of Suicide) Prevention training for staff and students, providing staff w/a basic training in ALICE training, updating students academic records throughout the year, providing counseling support when needed to students in crisis, organizing and setting up HiSET opportunities for eligible students, providing student recognition for good character and academic awards and scholarships, in addition to helping students apply for college and troubleshoot through questions on financial aid. Fortunately, I have another colleague who is currently working toward her license as a school counselor. She brought w/her experience working in a STAR classroom with students who had emotional and behavioral concerns. Honestly, I think the ratio of 400 to 1 is ridiculous and unrealistic. If anything, it would be more appropriate if the ratio was closer to 150 students to 1 counselor. B/w my fellow school counselor and I, she and I are currently juggling Vocational Co-op (Work Study) and Internship opportunities. Our administration has created a position in which another professional would manage Vocational Co-ops, Internships, and Apprenticeships. Currently, we cannot offer Apprenticeship programs b/c we don't have the staffing. I know for a fact we have many students who are interested in trade programs and they would benefit from a more comprehensive, professional program including aspects like Vocational Co-ops, Internships, Apprenticeships, Job shadowing, etc. I think if we were to decrease the number of counselors offered in our school district, many students would suffer and that lack of support would extend past our students to their families and our communities. Please contact me if you would like to visit further about this.

Teresa Vaughn HS School Counselor Fergus High School

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 365 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards not forward , instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas. As a person who works directly with adolescents and their families, I find myself frustrated and quite honestly in disbelief that this would be a recommendation from anyone in education. Please reject this recommendation knowing that what is best for our kids, families, and communities is to have more support, not less. Sincerely,  
Aaron Shattuck

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I understand you are considering limiting or cutting school counselors and as a concerned tax payer this concerns me to hear this. We need all the help we can for our children in today's environment. Please reconsider cuts to this vital program for the health and welfare of our children. Please hear my plea to maintain the school librarian and school counselor ratios. Changing the ratios would unfairly target rural schools. As a veteran teacher with 31 years of Montana teaching experience, I know the value of our librarians and counselors. Mental health issues in our schools are at an all time high. Counseling services are needed now more than ever. Eliminating the ratios is a band-aid fix. Please do not short change our kids.

Kendra Veit 2nd grade Malta Elementary School

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I am writing to ask you to vote down Superintendent Arntzen's proposed changes to remove librarians and counselors from school accreditation requirements. These changes will disproportionately affect students in rural schools at a time we should be emphasizing adding mental health services to school, not removing them. Additionally, Superintendent Arntzen's proposal to eliminate specific elective programs and credit requirements in middle schools prevents student access to music, visual arts, career education, and many other courses. This is a terrible idea and puts in jeopardy the education we are able to offer our students. Please do not approve these proposals. They are bad for Montana students! Sara Ibis Missoula, Montana Public Educator

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I am writing to ask the Negotiated Rule Making Committee to please maintain and preserve specific electives and credit requirements for Middle Schools. Thank you, Becky Albertson

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My name is Carly Swain and I have been a School District 2 employee since 2015, working solely in Title I schools. If anyone truly believes that cutting school counselors and librarians is in the best interest in the children of Montana, they are very clearly oblivious to what is actually happening in the public schools. One might even infer that he or she simply wants to appease a political party rather than make decisions based on the needs of Montana citizens. At this moment in time, we would lose our full-time school counselor and our students would only have access to her services 2.5 days a week (given that there are 5 days in that particular school week). Currently, our school counselor meets with 20+ students twice a day to set positive behavior goals with several students already graduating out of that program. In addition, she is on-call every hour of the school day to help students cope with abuse, trauma, friendships and countless other issues that they would have zero other resources for without her. Most of our population would not be able to afford an outside counselor, nor accept it if outside counselors were even available to get into given the high demand in our city right now. For almost half of our students she is the only mental health professional they are able to see. To mention yet another way she provides support to students and staff at my school, she does classroom guidance lessons 5 days a week to help the tier 1 students learn conflict resolution, goal setting, academic goals, personal safety and countless other vital life skills. If you choose to approve the changes Arntzen is proposing, you are NOT advocating for those too young to advocate for themselves and are consequently setting up an entire generation to have a lesser chance of success as adults. Sincerely, Carly Swain

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I am writing with the utmost concern for our Montana students. I am a retired teacher, who taught for 32 years. When I retired, which was before COVID had pounded our nation, our need for school counselors was already in a shortage. With the increase of student disorders, drug use, social media problems, and now the with the fallout of COVID issues, our students are in the need of more counselors, not less. The ratio of 400 students for one counselor is absurd. How is one person suppose to be able to help 400 students? That would be a quick greeting as the students enter into the building and then maybe work with five students who are erupting the loudest that day, maybe being able to put out one hot spot of a fire for the moment, but by no means would the counselor be able to extinguish the wildfires that are burning in these students' lives. Along with these ratio numbers also presents the problem of one counselor having to be in multiple buildings. Most middle schools are not in same building as the high school, the counselor would have to travel to another building and try to make a minimal impact at that school as well, again maybe being able to put out one hot

spot for a moment, but not extinguishing the fires that are burning. Is that what Montana is choosing to do? Giving the minimal amount of help to students who are in need of maximum help is going to have such a negative effect on our society as a whole; if we cannot help and heal those who need help at such a young age, their problems are only going to snowball and soon become so massive for the student they will see things as hopeless. Citizens without hope, is not the Montana Educational System we want to provide. So please, do not pass the accreditation changes that Elsie Arntzen is seeking to take place. Cathie Bradbury Hill County

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Please do not reduce or eliminate the requirement that Montana schools provide librarians and councilors for our kids based on the current ratio system. These two positions give our children critically needed support in their educational development. Please let me know the results of your hearings. Craig McClure

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I have taken a look at the changes that are being proposed for ARM 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 and it appears that should these changes be put into effect, schools will no longer be required to teach specific electives such as music, visual arts, and world languages. As an educator, I strongly urge you to reconsider this proposal, and to consider the potentially damaging effects it can have on our students. How will students be drawn to the arts if they don't have the chance to explore them at a young age? Thank you for your consideration.

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I'm writing with concern regarding the proposed elimination of student ratios for Library Media Services and School Counseling staff. In our current school climate, students are desperate for Social-Emotional Learning and school counselors are essential for championing that initiative. Eliminating ratios will limit student access and dramatically impact rural Montana. Similarly, librarians are truly the core of our schools - please make sure every student continues to have equal access. Doug Rossberg Missoula, MT

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I strongly disagree with these new recommendations. As a teacher of 23 years I believe we should be finding more ways for students to access information and counseling, not limiting access. Please do not go through with these recommendations. Thanks Glen Wall

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I am writing with strong opposition to the proposed rule changes for electives and access to specialists, most especially the changes to the rules regarding counselors. As written the changes would greatly reduce access to quality counseling. Our counselors are unable to meet the needs of students as is. This would be an utter disaster. Kids are coming into school with fewer social skills and far more heavy emotional needs. The rule changes could be catastrophic. I would propose that instead of changing these rules, which I assume is meant to give more flexibility to schools who are having trouble finding staff, we change how we recruit and train teachers. If we allow a path to teaching that looks more like the trades we would be more successful. Let a teacher in training be with a class full time under supervision and complete education classes online. This would allow rural schools to hire locals that want to contribute to their community without forcing them to leave to attend university and incur huge debts they can't repay with the low salaries small communities offer. Please reconsider these changes. They won't solve issues and will make it hard for students to receive services.

Sincerely, Janet Morgenstern

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I am writing as a school nurse, and on behalf of the students being served by public education. Our students deserve to have full access to library services, as well as music and counseling services. As a school nurse, my practice is guided by evidence based principles, as should provision of all services in our schools. Research supports that students often arrive at school unprepared to learn due to mental health challenges, particularly evident after the second year of a pandemic. The pandemic has presented many challenges as evidenced by the lag in testing results. To remove the support of mental health in our schools is unconscionable. In addition, our students benefit from more than the basic subjects presented in the classroom. Counseling services provide a necessary support to our students, as well as providing them with a resource for social emotional learning. Library science is a SCIENCE, and provides a foundation for reading, contributing to academic achievement, lifelong learning and 21st century skills. Music is an essential tool for social emotional learning, as well as other realms that are beneficial for our students, as is, again, evidenced by research. In addition, music contributes to the development of language and reasoning, mastery of memorization, increased coordination, and overall, provides a more global educational experience for our students. Before considering REMOVING services to our students, please consider the impact this will have. The goal of education should be to provide a rounded education, complete with social emotional learning and all other benefits that the specialists in our schools provide . *Aloni B. George, BSN, RN, NCSN RN Case Manager*Jeannette Rankin, Meadow Hill Middle School, Sentinel High School

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In response to Superintendent Arntzen's recommendations for Graduation requirement changes, as well as Councilor and Librarian standard changes, I need to make comment. I do not ordinarily get involved in these policy making discussions, but in this case I feel it is necessary. With the proposed changes to wording of required classes, electives, and staffing, our schools (particularly rural schools) could be decimated! Our state has a wonderful education system and the standards have been carefully crafted over the years. Many people have worked for graduation requirements and standards that will produce well educated children in our state. These changes would effectively trash many years of good work that ensure a quality education for our children. I see nothing in the proposed changes that would benefit the education of our students. It looks like these changes might be a knee-jerk reaction to the challenges of hiring qualified people to teach the classes and services our schools have. The solution to these challenges is NOT to gut our educational system, but to collaborate with others in education and get more people interested in teaching. Yes, that takes longer and is a lot harder to do, but taking shortcuts in our education system will severely harm our children's future. That is NOT something I ever want to see. After all, we do what we do in the best interest of the kids. Thank you for your time. Sincerely, Jeff Skogley

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Please reject Superintendent Arntzen's recommendations for school library media services and school counseling staff. Her plan will unfairly target rural Montana students for elimination of services. Please maintain the current librarian and counselor ratios. Jim Johnson Wibaux MT

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I just wanted to reach out to you in order to provide comment prior to the Negotiated Rules Making Committee before it meets this week. In regards to the proposed accreditation changes that would remove the ratios in place ensuring school districts have minimum Librarians and Counselors... As an educator that has served in both a small school district (50 students) and a large district (1,000 students), there is an overwhelming need for these critical support staff in proper ratio to students. The amount of trauma that today's students come to us with (especially with a recession looming) is something that only can be addressed with one-on-one attention. Thus allowing individual school boards to determine whether they even carry on staff a Counselor or Librarian (who provides supervision and guidance within a large safe space in the library) is dangerous and will likely have dramatic repercussions. Also, who I'd like to note that in one of Ms. Arntzen's recent newsletters, she calls for a renewed emphasis on math and reading and for basing teaching on evidence-based best practices; yet 20 years of studies show a very strong correlation between student achievement and school

libraries staffed by trained librarians. I feel that is safe to say that it is OPI's responsibility to provide school boards across the state the appropriate framework to build a safe and product school district (especially since the majority of school board members don't have a formal background in public education). By removing standards and requirements, we begin relying on a handful of sometimes misinformed community members to make monumental decisions for our school districts. Sorry for the long email. I appreciate all that you do to support public education in Montana, and I appreciate your time given to me and my thoughts on this matter. Have a great rest of your week! Josh McCrossin Middle School Physical Education Teacher Head High School Football Coach

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please...to anyone who truly cares about tweens...if ever there was a time in this crazy confusing world of Covid, suicide and mental health issues facing our kids this is a time to EXPAND and not reduce student exposure to the arts, music, world cultures...please open our hearts and brains to providing avenues and opportunities to explore, learn, mend and thrive. Sincere thanks for your consideration...

Karen Lazetich Moses

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These are important members of our schools. We are in mental health crisis in our country with more and more suicides and mental health diagnosis. Teachers are not properly trained to deal with students with these unique needs without the support of trained mental health professionals. Librarians are also important in teaching children a love for books. Taking away these professions would not help our current school climates.

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I am a 4th grade teacher in the Livingston School District, I am also the parent of a 6th grade student. The school counselors in our school district play such a necessary role in our schools. Students who come to school in crisis have someone to help them navigate through very complicated situations. They help students who are unhoused, have parents who struggle with poverty, addiction, domestic violence. Our counselors are very often the first person to identify these issues that a student faces at home. They connect the families to support services and help support the ability for the child to be ready to learn each day. If our counselors become overwhelmed by an unrealistic caseload the people that will be affected the most are our most vulnerable students. The families that do not have the means to find support on their own will be marginalized even farther. If the pandemic has taught us anything, it is that families in rural school districts become isolated very quickly. We need as many school counselors as we can across the state to ensure that these students do not fall through the cracks ever again.



The community resources our school counselor helped us find included a local QSA group, student mentors and a therapist. Without her out reach, I would have tried to navigate the issue on my own and never found the support needed for my child. Our community has a history of suicide at the middle school level. I feel that the help we received for my child from the school counselor could have very well saved her life. Kelley Myer

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Eliminating the ratio for the school counselors and school librarians would be absolutely terrible for our students and schools in general. As an elementary school para I can tell you that are staffing is already stretched very thin. Our students count on our school counselor every single day. She is constantly on the move helping students and staff. If we did not have a full time school Librarian this would take valuable teaching time away from teachers or students would not have books to check out and read at home. Our librarian also teaches important internet skills and art. There is absolutely no wasted time that I see in either of these two full time positions at our public school. Our students will absolutely pay the price if we did not have a

full time counselor and librarian. The teachers and other staff will be stretched even more thin that we already are without these positions being full time. If anything, the ratio should be lowered so we can have two school counselor. The mental health concerns in our students are rising. Let's take care of our kids by giving them the support they need. Tell the superintendent this is a privileged and selfish view that will do nothing but hurt our students.

Thank you, Kelsey Tommerup

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I would like to submit a public comment on Supt. Arnten's recommendations concerning Montana K-12 school counselor ratios. Over the last few years, the importance of school counselors has become increasingly important as student mental health (along with mental health of the population at large) has become increasingly important. Students come into school with a plethora of challenges dealt to them in their personal and school lives that counselors are called to assist students with, in order to keep them in school, meet their basic needs, and enable them to be productive in the learning environment. These counselor professionals assist all students in the school, independent of family status or ability to pay for equivalent private services, and often catch students who otherwise wouldn't be provided help. School counselors not only respond to needs and events of students and their families in real-time, but enact educational and preventative programs to help students grow and develop strategies for dealing with issues in their individual lives. Having a full-time staff member in the building with the students is critically important to establish a trusting relationship with students, address small concerns before they become big ones, track issues over time, and notice issues others might not see. These members on staff often initiate contact with students when issues are noted (as opposed to the student themselves seeking help, which also occurs), and are a highly valued resource for teachers and other members on staff when they note issues they are unable or unprepared to deal with. Going through COVID-19, I was hoping that this need would be recognized by local school board and state leadership with increased awareness and funding to meet the increased need faced by our communities. Sadly, not only does this not seem to be the case, but the proposal to do away with the counselor to student ratio ignores the importance these employees play in the educational process and the impacted students. I am deeply disappointed in this proposal, but hope that the Negotiated Rule Making Committee can work with Supt. Arnten to vote down this proposal and recognize the urgent need for mental health professionals embedded in our schools and communities. Thank you. Kit Edington

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I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely, Kristi Laib

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I would like the ratio for Librarians and Counselors to remain the same and not be changed. Thanks Kristin Basinger (CHS) Helena Please do not eliminate specific elective programs and credit requirements in middle schools. This will diminish student access to music, visual arts, career education, and other elective courses. Students, our youngest citizens, deserve a well rounded quality education that will help them grow into contributing members of our society. Of course a core curriculum of academics is required for any positive school experience, but many students make solid connections and extend their learning through elective courses that enable them to express themselves in a creative way. All learners are different and we, as educators, need to provide a variety of courses to meet their specific and unique needs. Thank you for considering our students and their access to quality public education.

Kristy Michael

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To put it mildly, I am terrified by EA's idea to cut the counselor ratio in schools. As a 30 year educator with half of that time as a K-12 Counselor, I have never seen counselors MORE necessary than RIGHT NOW! Do you have any idea what the suicide rate in MT is for kids? Does she? This pandemic has helped contribute to the declining mental health of youngsters of every age. Everywhere one looks, there are articles, television and news programs, and town meetings about the mental health challenges Montana's (and every state) students are facing. Educators see it EVERY DAY! We are exhausted and burned out - with lines of students waiting to see us. If anything, schools are seeing the need for MORE counselors, not less. Have you seen the latest numbers in the MT Youth Risk Behavior Survey? And of course MT is a rural state - EVERYONE (well maybe not everyone) knows that mental health issues are compounded by living with no access to mental health care for 100 miles or more. School counselors are often the ONLY therapists out there for kids and their parents. SO, requiring no counselors in rural schools is beyond frightening. Consortiums and Co-ops are fine, but cannot do the job of a counselor on staff. It sounds as if she doesn't think rural schools and rural kids deserve counseling services, when they are the population who need it more than anyone! My own daughter, an elementary teacher, took a class to be the part-time school counselor in her rural school in MT – ONE CLASS! She has never had such a frustrating year! She tells me she was not prepared for the student problems she was faced with. I had thought, and hoped that the stigma of getting counseling was getting less. But now Arntzen wants to move the clock backward. No counselors to be found - no counselors to see. MT's "pull yourself by the bootstrap" mentality will continue to grow and there will be consequences. If OPI is worried about schools getting counselors, they needn't be. More and more professional school counselor programs are available in MT with MSU-B, UM, MSU, MSU-N all having Master's programs. SOMEONE recognizes the importance and vast NEED for professionals in these positions. The program in which I received my degree required 60 credits; and included 30 credits of MENTAL HEALTH study. Please, PLEASE, don't let this change happen. If you have children, or grandchildren, or care about Montana's children at all - you must understand that Montana's mental health crisis is real. Our nation's mental health crisis is real! And it's getting so much worse. Our nation's political climate, COVID, socioeconomic differences, drug availability and use etc. are impacting the family model; which is impacting the students in our schools. Montana is 3rd in the nation in suicides, with young people being a shocking piece of that statistic. LGBTQ+ students, of which my school has at least 25, are at the forefront of that statistic. Montana's kids need MORE help, not less. Before you cut counselors, do your research. Talk to administrators, teachers and counselors in schools. Don't let one uninformed person push this idea on Montana's schools. You have a responsibility to help Montana's kids. Thank you and very respectfully, Kristy Z. Powell, 6-12 Counselor Three Forks Schools

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As a current school counselor and educator for the state of Montana, I am alarmed at the proposed changes to expected accreditation for Montana. It does not follow or meet the needs of nationally recommended specialists. As we move forward to meet the needs of our students, removing the PPE requirements for librarians and counselors will greatly reduce the services allowed and funded in our school districts. This will have an incredibly debilitating impact on the children of Montana in public education. Please DO NOT allow any of the proposed changes for the Librarian and School Counselor accreditation standards to pass. I ask that you take this into consideration as the proposed changes are discussed and voted on in the next few days. Thank you for time and consideration, Krystal Ferguson

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I have been an educator for 27 years. Please maintain our ratios of librarians and counselors. Thank you for your consideration, Lesley Holman

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As an educator of 15 years, having both served as a teacher and an administrator in both rural and larger school districts it is vital to maintain librarian and counselor ratios. A change would be a great detriment to students across Montana. Students are struggling in both literacy skills and mental health in the shadow of the previous two years. Librarians and counselors are a much needed tool for school districts to meet the needs of the students. This move would have negative repercussions for the school years to follow. Once again, please maintain the librarian and counselor ratios as they currently stand. Logan Brower High School Science Jefferson School District Boulder MT.

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School Library Media Services, 10.55.709 currently specify that the school library is housed in a central location and specifies staffing ratios based on student enrollment, guaranteeing that Montana students have access to a school librarian. Supt. Arntzen's recommendation eliminates the ratio, eliminating Montana students' access to school librarians. This recommendation unfairly targets rural students. School Counseling Staff, 10.55.710 currently requires a minimum equivalent of one full-time counselor for each 400 K-8 student and a minimum of one full-time counselor for each 400 high school students with this ratio to be prorated. School districts with fewer than 126 students may employ or contract or use a consortium, multidistrict agreement, or interlocal cooperative to secure counseling services. Supt. Arntzen's recommendation eliminates the ratio, eliminating Montana students' access to school counselors. This recommendation unfairly targets rural students. Margaret F Johnson

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My name is Mariah Purcell and I am a middle school ELA teacher based out of Corvallis, Montana. I am writing regarding some proposed changes to the school accreditation requirements, which appear to make it so school districts could all but eliminate school librarians and counselors - even centrally located libraries, as well as make it fairly easy to drop art and music programs. It is worth noting that in one of Arntzen's recent newsletters, she calls for a renewed emphasis on math and reading and for basing teaching on evidence-based best practices; yet 20 years of studies show a very strong correlation between student achievement and school libraries staffed by trained librarians. Furthermore, art and music are integral to overall student success and provides vital opportunities for self-expression. I urge you to reconsider these proposed changes to the legislation, and instead, please work on promoting policies that advocate for the importance of school libraries, counselors, and arts and music programs. Please share these comments with the Negotiated Rules Making Committee before it meets Wednesday afternoon. Our schools cannot properly function without these important components. Thank you for putting our schools, and especially our children, first, Sincerely, Mariah Purcell Corvallis Middle School 8th Grade Language Arts

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In times like these students need increased access to counselors and librarians not the opposite. I urge the committee to keep the ratio between students and counselors at the highest level possible. Deny Supt. Arntzen's latest attempt to punish our public school students by limiting services. Mary Brauer Bozeman, MT

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I write to you today to express my profound disagreement with Superintendent Arntzen's recommendation to eliminate ratios of students to librarians and counselors. Both positions are integral to the well-being of students AND the overarching pursuit of education. Eliminating or reducing their presence in schools is a major step backwards... They are already stretched thin. What good are academics to the future generation if they grow up miserable and without access to books? Literacy, art, social skills, self-advocacy, and the many other things that librarians and counselors are tasked with are imperative to the functioning of schools. No budget struggle should justify their absence. Please find a better solution to the crisis that motivated this decision. Sincerely, Matthieu Oppedahl (He/Him/His)

1st Grade Teacher Jefferson Elementary

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I am writing in opposition to the Superintendent removal of ratios for librarians and counselors. I think its important to keep the ratios or improve student access to these areas, not make it easier to remove access. Thank you for your time Michelle Wheat

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I am writing in concern to the librarian and counseling ratios that are up for elimination. I work in the elementary school and have children of my own that attend. I would really like for them to continue to have the opportunity to use and have access to these teachers and rooms. Please let me know how I can further help to keep these around for our future generations. Sincerely, Misty Warner

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I'm writing to ask you to maintain the librarian and counselor ratio for accreditation standards, as well as the elective options for students. It is essential that Montana invests in its youth to support their wellbeing and development to enable them to be strong citizens when they enter adulthood. Supporting a strong foundation for them now is an investment in the state's future. We want youth who are healthy, mentally and physically, who have basic media literacy skills, and who are also familiar with a variety of disciplines and skills through elective course exposure. This is how we create well-rounded citizens to lead Montana through complex situations in the future. Please continue to invest in our youth. Thank you, Morgan Curtin, M.Ed.

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Librarians and counselors are crucial to what we do in Corvallis and across Montana. Being able to have the right staff to student ratio is especially important. Trained librarians and counselors are so valuable and do so much more for a school than what is on their job description. Despite lack of funding throughout the state of Montana, I believe we should not do away with the librarian and counselor ratios. In addition, music and the arts are extremely important, especially in the middle school level. Numerous studies show how creative arts allow student growth in many ways. Music and the arts benefit middle school students who are trying to explore and discover who they are. If anything, music and the arts should be more valued and required at that level. Thank you for the opportunity to comment on this issue. Best regards, Natalie Martin Corvallis Primary School Music Teacher

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I am aware that Superintendent Arntzen is recommending some changes to be voted on tomorrow by the Montana Board of Education. I strongly disagree with the proposed changes to Library Media Services and School Counseling Staff. All our public schools need the same access to services from librarians and counselors to assure that students get the very best out of their education and stay as healthy as possible during these challenging times. Thank you. Patty Basko

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Please maintain the ratio for counselors and librarians! These services are mandatory and much needed in all schools. Let's move forward, not backward. Thank you for keeping our children as a priority. Patty Buckley

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I was recently made aware of changes that are being recommended by Ms. Arntzen. As a former school board member, parent, and grandparent, I am writing to oppose the changes. School librarians and school counselors are VITAL for our future. Students need these important advocates for a well-rounded education. The suggestions made will especially hurt our rural schools, and breaks Montana's guarantee of quality education for all. I am available to discuss my concerns further if you would like. Thank you for your time. Rebecca Webber, M.Ed

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MFPE Rapid Response Team, Thank you for taking swift action on Elsie's librarian and counselor proposals. I'm not sure what to say or how to say it; my feelings are everywhere. I can't believe they would even entertain this idea. I come from a very rural area. I live and teach on the Blackfeet reservation. Where students suffer more than average. Students are suffering from the loss of loved ones due to substance abuse. We need more counselors than we have more. My main concern is the library/ librarians. I saw the need not only in my school but in the community. I took it upon myself to enroll in school three years ago. I started my library media specialist endorsement best decision I ever made. BUT I feel bamboozled like it was a big waste of time! Please don't allow her to take away something I work so hard for. Our kids need a librarian. They need a library. The research alone shows the need for libraries and librarians are needed We are the HUB the heart of our schools. Thank you for your support. Sadie Harwood

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I am emailing because I am deeply concerned about Superintendent Arntzen's recommendations that will gut many of the current accreditation standards for public schools. In particular, the recommendations for library media services and counseling staff seem designed to further alienate rural schools from services and supports that are sorely needed. I am struggling to understand why anyone working in public education would want to limit access to libraries and counseling. Superintendent Arntzen has shown contempt for public education from day one and these recommendations further prove that she has no interest in providing the best possible education for our children. We need to make sure that our rural communities are not left in the dark. I hope these recommendations will not be implemented. Sarah Avery she/her Para Educator Structured Learning Program C.S. Porter Middle School

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I am a school nurse in the city of Helena and recognize the critical importance of staffing ratios based on student numbers, as they are, for librarians and school counselors. I cannot begin to understand Superintendent Arntzen's attempt to eliminate ratios set to ensure our students have access to the instruction they need to be successful students in the library. Clearly, she cannot understand the curriculum and importance of educating our students. I also cannot imagine Superintendent Arntzen has any idea of the importance of school counselors. At a time when research shows our students are being impacted with increasing rates of anxiety and depression. School Counselors are on the front line of essential care for the mental health needs of our students. They are frequently the first to identify disturbances in thinking among our students and are the position to refer for professional help. I ask that these attempts to eliminate ratios be rejected. Respectfully, Shannon McNamee BSN, RN, NCSN

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As a current middle school secretary, it is easy to see that student needs are increasing for mental health support, not decreasing. With the current eradication of the CSCT program and now this suggestion by Elsie, I'm at a loss of how we will support these kids. For a large number of our students, school based counseling and support is all they have. I can't imagine what the perceived benefit of eliminating ratios would be. As a result of limiting availability to a counselor, Classroom behaviors and disruptions would be more frequent resulting in a loss of educational gains for all students. In addition, I could easily see this creating a larger exodus of teachers leaving the state and possibly the field. Please vote against eliminating ratios for public school counselors and media specialists. Sincerely, Stacey Skinner

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The proposed ratio change for librarians and counselors in schools is unacceptable. We need trained professionals in those positions, and the ratio change will damage school programs until the future and affect generations to come. Please do not change the ratio. Sue Furey

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I am a teacher of 13 years, and am writing in direct opposition to proposed changes to school accreditation standards that would eliminate the ratios of student-to-counselor and student-to-librarian numbers. Superintendent Elsie Arntzen's proposed changes have the potential to decrease access to certified school librarians and certified school counselors in our schools. This is UNACCEPTABLE. Our school counselors are vital to a student's overall wellbeing, providing invaluable services essential to a student's social and emotional growth. Now, more than ever, the mental health of our students is of paramount importance. Detimental effects of the pandemic have adversely affected our students, and eliminating student-to-counselor ratios in schools directly impacts the well-being of future generations. Schools are currently in deep need for *additional* licensed health care professionals, and ratio elimination would be a disastrous step backward for our precious Montana children. Of equal importance and value is the role of the school librarian. Libraries are the heart of every school, and access to books that are tailored to a specific child's interest and ability level only serve to boost and enhance their reading opportunities. As we all know, books are at the core of any solid educational experience, and eliminating student-to-librarian ratios decreases the effectiveness of school library programs. I urge you to carefully consider these proposed changes to accreditation standards. Schools are currently in deep need for *additional* licensed health care professionals, and depend heavily on full-time certified librarians. Ratio elimination would be a disastrous step backward for our precious Montana children. Please, do not allow this injustice to occur. Thank you, sincerely, for your time. Sydney Stauffer

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I am writing to share my concerns regarding the proposed revision in school accreditation requirements. Superintendent Arntzen proposes doing away with student ratios, so that, apparently, school districts could all but eliminate school librarians and counselors - even in centrally located libraries. At the same time, she calls for a renewed emphasis on math and reading, and for basing teaching on evidence-based best practices: 20 years of studies show a very strong correlation between student achievement and school libraries staffed by trained librarians. Research demonstrates certified librarians (who often hold Master's degrees) increase student achievement, student literacy, and even increased graduation rates. School librarians are charged with teaching students technology, civics, media literacy, life and career skills, as well as fostering a love of reading that will be sustained into adulthood.

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I am sending this email on behalf of my two school aged children, currently enrolled in MCPSMT at grades 7 and 2. My youngest, 8 years old in 2<sup>nd</sup> grade, has been dx'd with mild-moderate autism, and absolutely would not excel with his access to services and counselors in his place of education. As well, he must have access to librarians and "electives" as written out, which both demonstrably help him with his fine motor skills and sensory avoidance. I am begging you, please do not cut out these critical positions in our education system. So many parents could not do it without the tremendous work from our variety of educators, staff and other valued professionals in the public school systems. Respectfully and gratefully, Traci Bosshardt-Patino Vendor Maintenance

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I am writing to urge a very strong recommendation AGAINST Superintendent Arntzen's recommendations that the language that supports students' access to school counselors and school librarians be taken out of the accreditation standards. We need stronger ratios, not none, in the language. It is clear that the current Superintendent does not support strong public schools with recommendations such as these. I have seen, firsthand, a dramatic increase in the need for mental health care in school and wish to see more qualified, empathetic, hardworking educators in our schools and communities. The ratio of educators to students is one way to help that increase happen. On a personal note, I feel it is an interesting coincidence that we share the same last name. That is my married name and am fond of and interested in my husband's family. Thank you,

Tristen, for carrying the message of educators for the benefit of our public school children. Respectfully, Twila Loveridge School Guidance Counselor Pine Butte Elementary School, Colstrip Public Schools

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I am writing to strongly urge the rules committee to oppose experience the changes For libraries and school counselors as proposed by Superintendent Arntzen. School counselor changes: As an educator with 40+ years of experience I can not express strongly enough the need for full time school counselors. Their expertise is an invaluable resource and a NECESSITY. Our students Mental Health has reached crisis proportions and we cannot fail them by cutting these services!! The current administration has already removed outside mental health agencies from our schools leaving an enormous load on current school counselors!!! Please stand up for our ex students and vote no to these changes. Library changes: Public Schools were created for the education of all students to build an educated and skilled community Cutting services in providing library services flies in the face of the very philosophy of public education. Libraries and trained personnel provide resources to our students to enable them to become strong community members who global knowledge needed to be successful in today's world. By reducing access to libraries we in effect reduce access to knowledge. Secondly access to books and early reading to students are the number the # one predictors of student success in reading. For many students our public school is the only place for them to access a variety of books and literature which in turn promotes our humanity as a society. Please oppose the recommendations proposed by Supt. Arntzen Vicki Hilliard Lewistown Mt

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I write today to ask the Negotiated Rule Committee to reject the recommendations by Superintendent Arntzen to gut the current accreditation standards for school Library Media Services and Counseling Staff and the elimination of specific elective programs and credit requirements in middle schools, preventing student access to music, visual arts, career education, and many other courses. Eliminating the staffing ratios will disproportionately affect rural schools that desperately need access to these important resources. Eliminating access to career, technical, arts and agricultural pathways will hinder the success of Montana students in college and in the workplace. We already know the importance of technical, arts and ag education in terms of career development and we know that young people are leaving MT for better opportunities elsewhere. Why take away the classes they enjoy the most and hamstring their pathways to success in college and the workforce? Librarians and counselors are critical to all schools and students; they provide important guidance, they teach students to think critically, and they provide the resources and support learners need in school and beyond. Librarians are critical support partners for teachers as information specialists. They help students learn the best ways to access and use quality information and resources, help them to enhance their study and research skills, and explain how to use the latest technologies to enhance their learning. Eliminating the staffing ratios simply robs students of qualified professionals who dedicate their lives to growing young minds. Why on earth would we want to limit the number staff who support our kids on a day-to-day basis? Why would we want to hurt our schools more when they're already suffering? This is madness- please maintain the current staffing ratios and keep the arts, technical and agricultural studies programs in tact. Matt and Violet Olson, Missoula I am a teacher and a parent. I cannot even believe that these are proposed changes for education in general! Please do not allow any of these changes to librarians' jobs AND please do not allow these changes to the middle schools. These are terrible changes and will ruin kids' education and exposure to these important subjects. Sincerely, Wendi Graves

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I wanted to voice my displeasure at the recommendations coming out of Elsie Arntzen's office regarding Library and Counselor services. These recommendations are not in the best interest of Montana's children and should not be enacted. Respectfully,  
Will Middagh, GSEC, CompTIA Net+  
Cyber Security Analyst

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Hello,

I am writing in opposition to ALL of the proposed changes to FTE ratios at the library and counseling level and the strike of requirements for music and art. While I understand funding is an issue these programs are too important to be cut, especially counseling. Our children need all the mental health and support in optional programs as possible.

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I am writing in response to the devastating proposal of ARM 55. As a teacher with MCPS, one of the things I am most impressed with is the dedication to art, music, and libraries. In my school, at CS Porter, the district just invested heavily in the remodeling of our beautiful and well run library and our music wing. Our middle school has a constant rotation of classes utilizing the library and getting direction from a certified librarian. I am across the hall from our art class and see first hand the enthusiasm for art from our middle school students. For many, it is their favorite class. I am an early arrival at school, usually getting to work by 7 am. Yet, my colleagues in the music wing already are in full swing with students arriving early to practice. At dismissal, I see the majority of students leaving with their band or orchestra instrument. There is a clear correlation between general academic success and music education.

Now is the worst time ever to reduce counseling staff. We are far from recovered from the coronavirus pandemic that severely impacted many of our students and families. Many are still in a state of crisis that is being exacerbated by the high costs of food, fuel, and rent--all stressors for students and families. From what I see on the ground, we need more counselors per so many students, not fewer.

Finally, Montana's graduation standards are some of the weakest in the country, and it looks like they are being watered down with this proposal. I understand flexibility is needed in small rural schools, but lowering the bar is the last thing we need to be doing right now.

Thanks for the opportunity to share.

Sincerely,

Michael J Heriza

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. I am a mental health counselor in the community and in the last two years I have seen a significant increase in our students' [mental health challenges \[nytimes.com\]](https://www.nytimes.com) (locally and nationally) including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties.

Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. Montana needs substantial increase in [mental health support \[bozemandalchronicle.com\]](https://bozemandalchronicle.com) for all ages, but especially teens more and more services have been reduced due to low employment or funding changes

and this will only lead to an increase in demand for crisis services. Prevention and multifaceted support is the only way to tackle this [mental health crisis \[whitehouse.gov\]](https://whitehouse.gov) (please read all the links provided to reference the current crisis). The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Please take this letter very seriously, the health of our children is a crucial need.

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I wanted to write in response to Superintendent Arntzen's asinine proposal to increase school counselor and librarian ratios. In a world where we are becoming hyper-aware of the devastating numbers of mental health issues among children, this would be detrimental. Please consider maintaining the current ratios, as they are already almost double that of what the American School Counselor's Association current recommends, and allowing properly educated school counselors to continue to reach our children. Doubling ratios would absolutely mean children would fall through the cracks. Thank you for your time and concern for the mental health of our children and the appreciation of our school counselors.

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I oppose the proposed changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

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I have two kids in public schools in Bozeman - one in 3rd grade and one in 5th grade.

My kids rely on the school counselors, they are thriving in the music programs, and they are excited for the choices offered in the middle school art, science, world language and career exploration curriculum. They use their libraries extensively - not just to check out books on their own, but to explore the world and learn how to navigate information with the guidance of their wonderful and highly qualified librarians. These are all critical to our public education and to the development of our future leaders.

The changes being proposed are short sighted. They will hurt the most vulnerable children the most. Rural communities with fewer options will suffer even more than my children in Bozeman will. Schools are the hearts of our communities, please do not change these standards.

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I am currently a librarian for a public school that serves grades 7 through 12.

The fact that this is even being considered is absolutely ludicrous to me. It truly shows that intentions do not lie with the students' well-being whatsoever. To deny them resources such as School Counselors or Librarians would not benefit them in the least. They deserve better than that! We can do better!

We need to maintain the current librarian and counselor ratios. The youth need both. Students in smaller schools and rural populations need BOTH.

Sincerely,

Laura Wall

Librarian, Wolf Point Schools

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Good morning,

I am writing to express disagreement and displeasure with Superintendent Arntzen's recommendations re: counseling, librarians, music, etc." which would make them elective or optional for each district rather than requiring them.

Mental health issues are at an all time high due, at least in part, to the pandemic, economic hardship, existential issues (climate change, food insecurity, etc.), and overall conflict and inequality in our society. This is no time to reduce counseling services, or make them optional, for children who desperately need them.

Reading and literacy are crucial to a successful personal life and a functional society. An educated and knowledgeable librarian is not just helpful but necessary to assist and foster these skills in children.

Music/Arts are also essential to the creativity, emotional health and well-rounded development of children. Public schools must continue to offer these opportunities to all children, to give them a real education, put them on an even par and prepare them for higher education and a competitive life in the real world.

Please do not accept these recommendations. They will be detrimental to the children Sup. Arntzen supposedly serves and will be disappointing to all parents, once they actually realize what is going on and how they will affect their children.

Thank you for your time and consideration.

Karen Jarussi  
Billings, Montana

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Dear Supervisor Arntzen:

I'm writing to state my objection to your proposed rule changes which would reduce the number of counselors and librarians in public schools throughout Montana.

I see no point to these proposed changes except cruelty.

We must provide a quality education for all students in Montana (it's in our Montana constitution) including those who need additional help to stay in school. Suicide is a leading cause of death for Montana teens. Counselors save lives.

Not to forget, all students benefit greatly from the research and knowledge services of a librarian. Google is an algorithm based on popular answers, not knowledge.

Sincerely,

Melissa Smith  
Great Falls, Montana

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Please submit this to the negotiated rule making committee for Chapter 55:

I strongly request and urge the committee to reject the proposed rule package reducing, month other things, the number of school counselors and the requirements for graduation and middle school fine arts.

We should be expanding in these areas, not the opposite. Removing this rule allows school boards to skip over these essential services when faced with budgetary challenges. As a parent of a child in elementary school now, I will count on he and his peers receiving quality instruction and support throughout his tenure in the Montana school system.

Respectfully,  
Jen Hensley

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I am writing to oppose the sweeping changes to Montana accreditation standards that are being proposed by Superintendent Arntzen. The proposed elimination of ratios for counseling and library services endangers students in rural communities both educationally and emotionally. Further, eliminating the requirement for programs in science, music, visual arts, career education, and languages in the junior high grades will result in students entering high school unprepared to pursue similar subjects in high school, if they are even offered. This, in turn, will hurt our students' chances to be accepted into accredited colleges and universities.

Implementation of the Superintendent's proposed changes would cheat students of the educational benefits of a broad and integrated curriculum and support for their emotional wellbeing and literacy. I strongly oppose these changes which will reduce opportunities for our students to become well-rounded citizens and increase the rural-urban divide.

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Dear Tristen,

I am writing to express my opposition to Superintendent Artzen's proposal to eliminate the ratio rules for counselors and librarians in our schools. With the rapidly rising rates of depression and suicide attempts in Montana children if anything, access to mental health counselors and the creative outlets provided by librarians should be expanded.

Thank you,

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mom of three public school students in Helena, a kindergartener and 3rd grader at Jefferson Elementary and a 6th Grader at Helena Middle School. My kids are very close with their librarians and have learned to love reading from the books the librarian picks for them. They have also made use of the school counselors. Just last week, my 6th grader was in the counselor's office because she was being bullied by another girl. We have already spent thousands of dollars on private counseling and need the school counselors to be there when our students NEED them.

Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). And the problem has accelerated in recent years. 41% of Montana high

school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone.

To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students in our state. I cannot state more emphatically how this rule change will impact the most vulnerable students attending the schools in our state with the least resources. Youth with suicidal ideation, Severe Emotional Disturbance and other complex behavioral health needs will suffer when schools are no longer to have counselors on site or maintain what are already paltry levels of service and staffing. Please reconsider.

In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state-particularly in low income and tribal areas. Please maintain the current language and standards for the good of all students.

Thank you for your consideration,

Tiffany Fox

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Good morning,

I am sending this email to please understand that importance of librarians and counselors in our schools. With a daughter entering high school next year and a granddaughter with special needs I ask that you DO NOT take into consideration the recommendations that superintendents Arntzen is purposing. Our kids and our educators deserve better.

Thanks,

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Good morning,

I am sending this email to please understand that importance of librarians and counselors in our schools. With a daughter entering high school next year and a granddaughter with special needs I ask that you DO NOT take into consideration the recommendations that superintendents Arntzen is purposing. Our kids and our educators deserve better.

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To whom it may concern:

I am a parent and a Montana resident residing in Gallatin County. I am writing today to let you know my disapproval of Superintendent Arntzen's recommendation to eliminate student counselor ratios. I have an elementary student that has benefited greatly from talking to school counselors. Unfortunately, access has been limited, his sessions have been cancelled multiple times, and it took a lot of effort on my part to get him in the door. It wasn't until the school had a practicum student that I felt he was finally getting the help he needed. It isn't just a mental health issue. His school work was significantly impacted by the overwhelming anxiety and social emotional issues he was experiencing and his teacher was no help, she actually made things worse. In my experience, Montana students need more school counselors, not less.

I don't have as much experience with the number of librarians the school has, but I do believe that access to the library on a weekly basis is very important to kids' growth and development. They learn very important skills and I do not support anything that would reduce or limit access.

Thank you,

Jessica vanGarderen

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All public school students in Montana deserve a quality education. Therefore, I urge the committee to maintain specific credit requirements and electives in middle schools. To be literate, informed citizens they especially need access to reading and writing literacy as well as other vital credit requirements. As some officials attempt to weaken public schools, I urge you to maintain programs for our students.

Mary Brauer

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As an educator for 37 years and a Montana voter I am appalled at the changes proposed by the very office that is tasked with looking out for the welfare and education of our children. These cuts are short sighted and add even more on the backs of teachers, who are already the frontline in making public education work for all students. To say that OPI is a sad disappointment under the current administration is a gross understatement.

Mary Brown

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Hello Tristen,

As a parent and Montana educator for more than ten years, I am saddened that Elsie Arntzen is proposing to reduce student access to libraries run by librarians and counselors. This is a terrible idea! I understand that rural districts have difficulties filling these positions, but changing the expectations for the entire state would have dire consequences. All students NEED access to trained librarians who can help them access information and books. Children also NEED access to trained counselors who can help them learn skills to safely navigate the process of growing up. I urge you, as a state employee, to stop Ms. Arntzen from going forward with this plan. At the least, please consider re-writing the proposed changes to be an exception for small, rural schools struggling to find staffing. At best, drop the changes entirely and find more ways to fund schools and fill our halls with trained professionals and support staff who can make a real difference. I want my own child to go to the library every week and build a love of reading with someone who was specifically trained to encourage young people to be literate. I want my own child to have access to an adult who spent years learning how to help young adults become successful, engaged citizens. All of the librarians and counselors are a necessary part of raising fully educated, competent adults.

Kind regards,

Jamie Moe

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Greetings,

As a middle school teacher, I am absolutely horrified by the proposed changes to the ratios for counseling, librarians, and the elimination of required electives. Without context, these proposals appear to unfairly target middle school students and most especially rural schools. While I perhaps can see that maybe you think eliminating these ratios will allow rural schools the ability to keep their accreditation without the burden of meeting the specified ratios, I sincerely doubt that they will have the desired outcomes, and they will have detrimental effects for years to come . Basically you're giving license for school districts to severely limit much-needed resources.

Libraries are a safe-haven for our students. By changing the ratios, or perhaps even allowing for the elimination of librarians in total, you're severely impacting the lives of students. Libraries and the librarians are sometimes the only place our students feel connected to the outside world; a place where they can find someone who will help them find reading material that specifically meets their needs or interests. Not only do librarians help students with reading material to broaden their world perspective, but they also troubleshoot technology issues. Since the pandemic started, our librarians, albeit unfairly, have been the de facto tech troubleshooters. Without them, I cannot imagine who would help us with the myriad Chromebook problems students and staff face every day. Our libraries solve problems all day long, both for staff and students: advice on best websites for credible sourcing, teaching lessons on citations, solving technology issues, a meeting place big enough for large groups, a quiet place to calm down when the world seems too chaotic, and obviously a place to find reading materials. Our librarians are indispensable and invaluable.

These proposed cuts to counseling services, especially during a pandemic, are absolutely cruel and unforgivable. We constantly hear how vulnerable our students are at this time, and you want to limit their access to school counselors when, especially rural students, might ONLY have the school counselor to help them through a crisis? It is a well-known fact that Montana has a considerably high suicide rate among teens. How does limiting access to counseling services help our most vulnerable teens? It doesn't. It harms them.

Elective programs are sometimes the ONLY reason students come to school. Those arts classes are the reason they find light in their world. These proposals allow districts to eliminate them in our students' most vulnerable years when they absolutely need creative outlets. Our middle school students depend on access to the arts for full brain development.

Researchers time and again have demonstrated the benefits of the arts for teens.

- They are less likely to use illegal substances both as teens and adults.
- significantly more attached to school
- less likely to be sexually active than peers who don't engage in the arts
- score significantly higher on standardized tests, especially in vocabulary
- significantly more likely to attend postsecondary schools/training

I think we can all agree, middle school is hard on us all; and yet, you propose to make it even more difficult by taking away their choices and thereby inhibiting their brain development and passively accepting the harmful results down the line? This is unforgivable.

If you believe you're doing what's right for kids, you need to rethink these proposals. They're harmful at their core and will have long term detrimental effects. Do not implement these proposals.

Thank you,

Cori Krick

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Hello,

I am a 3rd grade teacher in Bozeman and am writing to ask that you please maintain the current counseling and library ratios and do not change them based on the superintendents recommendation! These services are so important for our students!

Thank you,

Abby

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I have heard that today the state board is voting on proposed cuts, including, but not limited to :

Counseling, art, music.

I oppose this as now, more than ever, counseling is desperately needed in the schools.

Also- there is a multitude of research that states that all education is enhanced by the stimulation of the left brain, or creative side , which includes art & music.

Thank you!

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To Whom it May Concern,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years there has been a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for School Counselor to student ratio is 250:1. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
Lori Mondloch

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years there has been a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. I just graduated from Montana State University's School counseling program, which emphasized the important role school counselors play in the well-being of students. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. With Superintendent Artnzen's recommendation, we would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas. I am excited to begin my profession as a school counselor and ready to help meet the needs of students in Montana. I urge you to recommend policies that allow students in Montana to have adequate access to mental health support in schools.

Sincerely,

Bethany Lindner

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve two buildings totalling about 800 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Hannah Breeden

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. These numbers are evident especially in using the SOS Signs of Suicide program in my school. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 253 number of students. Even with this smaller caseload, I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. I cannot imagine how I would do my job, where I am lucky to have a lower number, with more students who are at increased risk. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Kimberly Tennant

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Good morning Tristen,

I am writing today to oppose the striking of certain language in policy that would negatively impact my children by taking away their access to beloved elective programs and the counselor.

Our teachers and staff are already overworked and underpaid. How can we expect them to provide our children with a quality education if we don't in turn support them?

I respectfully ask you to not support the recommended changes to the policy language.

Thank you,  
Tawny Cale

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Hello,

I am writing in opposition to Elsie Arntzen's sudden, proposed changes to our Montana public schools. I have heard that Mrs. Arntzen is intending to eliminate the counselor ratios and cut middle school elective requirements.

I was a middle school teacher for six years, and there was no one more important than our counselors. They were *always* spread too thin. When we have a state that is often #1 in suicides and known for lack of access to mental health services, and we are seeing a mental health crisis from the fallout of COVID-19, why would it even cross Mrs. Arntzen's mind that this is a good time to remove the extra support for our struggling children?

Additionally, we have continued to see electives whittled away each year for as long as I can remember. For many of our students who struggle in the core classes (math, English, etc.), electives are what motivates them to get to school in the morning. Art, music, and other electives are equally valuable to our students. We know the majority of the public complains that American schools put too much emphasis on testing and the core curriculum that is tied to that. Continuing to cut back electives, which are already limping along to survive, is only proving this common criticism and demonstrating to our state that Mrs. Arntzen is unwilling to listen to her constituents in pursuit of her own agenda.

I do not support these proposed changes to public education, and I ask that any proposed changes be more openly shared with the public, and part of a longer dialogue. Trying to make drastic cuts, quickly and without public knowledge like this only further erodes our trust and faith in Superintendent Arntzen to do what's best for our youth.

Sincerely,

Emily Landsiedel

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Good morning,

I am writing in support of maintaining the current librarian and counselor ratios under Mont. Admin. R. 10.55.709 and 10.55.710.

My son currently attends Rossiter Elementary in Helena and frequently comes home to tell me about his positive weekly experiences in library, where he not only evolves in his love of reading but learns about the importance of internet safety. He also frequently speaks of his positive experiences in his Social Skills class taught by his school counselor.

These specialists have greatly contributed to my son's ability to transition back to a school setting after over a year of pandemic homeschooling.

Additionally, in my work as an attorney, I frequently encounter youth and families in crisis who have difficulty accessing mental health services in communities across Montana. Having access to a counselor at school can offer mental health support to these children where there sometimes is none.

If these ratios are eliminated as Superintendent Arntzen proposes, I fear my son and his peers will be unable to access these important services that support their mental health and academic needs. For the sake of our schools and the families and communities they serve, please maintain the current librarian and counselor ratios under Mont. Admin. R. 10.55.709 and 10.55.710.

Kind regards,

Morgan Handy

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Please accept the following comments on the proposed changes to Chapter 55. These proposed changes are damaging to our children and our overwhelmed districts. The proposed changes are incredibly narrowminded and heartless.

### **ASSIGNMENT OF SCHOOL COUNSELING STAFF**

This proposal is just atrocious. We have been working with counseling staff in two schools here in Helena due to my son being bullied and threatened. To say both schools are staffed to under capacity is a severe understatement. There is barely enough time and resources for students that voluntarily come in because of struggles, much less the ability to reach out to the large at-risk population that doesn't reach out for help and just needs someone to reach out to them. **YOU CAN'T TAKE THIS AWAY.**

### **BASIC EDUCATION PROGRAM: MIDDLE GRADES**

The proposal to remove recognition, flexibility, and ability to instruct to the "unique nature of middle-grade children by focusing on their intellectual, social, emotional, and physical development" is inappropriate. Middle school is a time of turmoil for kids as they grow, change and develop in a world that us, as adults, haven't lived in. These kids need extensive support and understanding. To remove any recognition of the social, emotional and physical needs of these students in their unique time of development is abusive and will only open to more problems for our already overwhelmed districts. Removal of the arts and technology requirements only put our students farther behind in perspective and experiences. These are essential in their development and exploration!

Thank you,

Jennifer Wagner

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve grades 4-8 which totals to be about 800 number of students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs

of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Good afternoon,

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My name is Erin Loendorf and I am currently the high school counselor in Wolf Point, MT where I have worked for the last 10 years. I am a born and raised Montanan, and grew up right north of here in Scobey. I love rural eastern Montana. My children are school aged as well.

I am writing to encourage you to NOT accept the recommendations put forth by Superintendent Elsie Artzen with removal of the ratio for students to school counselors as well as librarians and middle school elective changes.

As a product of a small class C public school district in Montana, removing this ratio would directly impact rural students. If it weren't for a school counselor, I would not have had critical support to pave the road for me to earn my masters degree in counseling to then come back to serve students in Montana who are most at-risk on the Fort Peck Reservation.

The American School Counselor Association recommended student to counselor ratio is currently 250:1. By removing the ratio in the proposal, you're increasing burnout in those school counselors already here. And in fact, I encourage you to keep the ratio, and update it to reflect ASCA's recommendation.

My current caseload is much higher than the National ratio and as a current school counselor, we are drowning trying to address the mental health crisis in our adolescents in Montana post pandemic. I understand the crisis with openings across the state, but removing the ratio does not address the root issue which can be tied back to funding for Montana public schools. If this ratio is removed, and the needs of Montana's students are not at the forefront, you will see an even bigger increase in youth suicide in Montana. Depression is at an all time high among our students in Montana.

Please do NOT remove the ratio for school counselors. I encourage each one of to spend a week in your local school district and speak to local school counselors across the state. And yes, small, rural class c and b schools matter too.

Sincerely,

Erin Loendorf, MA

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Dear Board of Public Education,

Please reject the proposed changes for staffing requirements for librarians and counselors. I fail to see how reducing staff requirements numbers will support Montana students, especially during this mental health crisis. Maintaining strong standards for staffing school libraries and supporting robust standards for electives in middle schools is best for Montana youth.

Wanda Rumley, ret. educator

To whom it may concern,

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Our public schools should be a haven for arts and languages, they should be a safe place where students can get access to vital mental health care. Elsie Arntzen's recommendations will hurt Montana Public School Students.

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To the board, and whom it may concern.

I live in East Helena Montana and have three children - two of which are in elementary school, and one is an infant.

When I read the proposed changes by State Superintendent Arntzen to eliminate safe staffing ratios for professional mental health counselors and librarians in schools, I was immediately upset. I reject these sweeping changes, and I hope you will too.

While East Helena isn't a rural school, it appears that these changes, which may be needed in specific rural schools, are being applied to all schools, regardless of the students' needs.

These changes will weaken educational standards and the quality of education for all students, which is unacceptable.

Not to mention, our state is consistently in the top states for suicide and substance abuse, often in children and teens. This would be a foolish, dangerous choice.

Please reject these changes.

Thank you,

Whitney Dorr

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I am not in favor of the changes proposed by Secretary Arntzen. What is the purpose? If it is not broken, why break it?

With regard to counselors, Montana has a suicide rate that is quite high - our proliferation of guns is one of the reasons. Teachers have their hands full with large classes of diverse children. There must be someone to work with the child and parents.

School librarians provide a much needed break for teachers and for the kids. The librarian and library is considered a "safe" place for kids to have fun and not be judged. The teachers get another professional to provide input and observe - as well as provide additional resources. There is no need to lessen what is a quality program.

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I am a 6<sup>th</sup> grade teacher who witnesses these issues daily. We recently lost our comprehensive mental health teams that served our most

challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Kellie Sullivan

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No! The Superintendents recommendations for rural schools are detrimental to the education of Montana students. The education system is becoming dysfunctional and students and teachers are the ones that are paying the price. We need more teachers and support staff not less. I say a very strong no to her recommendations.

Sincerely yours,

Suzanne M. Flanary

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As a former middle school teacher, grandmother and voter I implore your committee to not reduce school librarians, media specialists and counselors. During my 30 years of teaching in rural Montana, I have seen the positive results from these necessary programs. These are precarious times indeed for children in our schools. Access to counseling and library services is a life-line for so many students during the continuing stress of the Covid pandemic. Your committee should be increasing these critical services rather than reducing them. The Superintendent's idea to decrease these services is cruel and heartless. Please do not reduce these services for our most vulnerable children!

Thank you,

Lynda Corn, Hamilton, MT

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I am writing to give comment on Elsie Arntzen's recommendations of the elimination of specific elective programs and credit requirements for middle schoolers. This is not in our children's best interests. The language she is recommending be crossed out is a huge disservice and I ask for you to preserve specific electives and credit requirements for our middle schoolers. Thank you for your time.

Tara Lee

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I am disappointed to hear or your request to eliminate the student-counselor ratio. The counselor-student ratio currently makes it hard enough as it is to fully meet the needs of our students, I can't begin to imagine the negative impact your suggested cuts would make.

Here are some scenarios I would like you to consider:

The student who is in an abusive home. Thankfully, the school counselor has a positive relationship with them and was able to get them into a safe placement after they finally broke down in tears after being asked time and time again, where today's bruises came from.

The student who is homeless. Thankfully, the school counselor knows the resources that student needs to get food, a bus pass to get to school, a place to sleep, and access to clean clothes, toiletries, and a place to bathe.

The student who struggles with their social skills or building relationships. Thankfully, the school counselor has programs like "Kelso's Choices" and the "Zones of Regulation" to implement in school to help them learn and practice these skills, make new friends, and process their emotions in a healthy way.

The student who is suicidal. Did you know Montana is ranked 3rd in the nation for suicide rates? Or that in Montana, suicide is the second leading cause of death in students ages 10-14? Thankfully, the school counselor has built a relationship with this student and they feel comfortable talking through their pain and struggles, instead of taking permanent action. Thankfully, the school counselor has the outside resources to refer this student to in order to increase their means of support. How about the student who was brave enough to inform their school counselor that their friend was making suicidal statements? Thankfully, the school counselor provided a "Signs of Suicide" training to all students to help spread caution and awareness about suicide. This brave student was properly educated to notice warning signs and to tell a trusted adult, thankfully.

The student who is trying to graduate early, with honors, or graduate at all. Thankfully, the school counselor has kept them on track with classes, assignments, or simply been the reason they come to school. To many students, the school counselor is the only supportive person in their life. Imagine being 1 of 400 high school seniors trying to graduate, and the school counselor misses a required class because they had 399 other students to also tend to, then not being able to graduate.

Or the student who is dealing with the divorce of their parents and simply needs a support person. Thankfully, the school counselor knows other students in this same situation and can create a group for these students to share and process their emotions without judgement.

Imagine if there were no school counselors present to help these students? Or 1 to over 400 students, as you are suggesting? How many students are going to fall through the cracks, miss graduation, not develop positive coping skills, or attempt suicide? These are just a few of the many things school counselors are trained to help with, in addition to their other required duties. I have been working in the school system for a short 5 years, and these are the first examples I thought of where the school counselor provided assistance in a way that no other staff could. I can't imagine what would have happened to these students had the counselor not been there because they had 500 other students on their caseload to be responsible for. These are some of the things you might not think about if you weren't exposed to it. Your proposal to eliminate the ratio is going to do nothing but take away positive, available support that is critical to our students. For many of our students, this type of support is not only the only support they can afford, but the only support they have.

I strongly encourage you to not move forward with your proposal to eliminate the student-counselor ratio. What you are suggesting tells our students that they are simply a number, and not an individual person worthy of the attention and support that is rightfully theirs. Our students need their school counselors now more than ever.

Regards,

Emily Brady

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Please know as a-parent of a middle school student as well as an educator in the Montana Public School System I am appalled at the very notion of Superintendent Arntzen's proposals before you. NONE of her proposals make any sense and she is moving into a very radical state. Please think long and hard about the consequences of her proposals to the children of Montana. Our children deserve a solid education which these proposals will not give them.

Sincerely,

Diane Dowd

I have just reviewed the proposed cuts to accreditation standards. I am amazed to see the extent of the cuts. If these are put in place there is a great chance that students will suffer and be denied access to quality educational programs. These are not cuts, they are guts, to necessary programs.

My public comment is NO to the proposed changes. We need to strengthen, not gut our schools.

You need to propose MUCH better than what is in front of you at this time.

Thank you for reading and presenting my comments,

Lisa Thomas

Teacher

Missoula Montana

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My name is Hannah Telling; I'm a high school English teacher, and I am emailing in regards Superintendent Arntzen's recommendations about ratios of students to librarians and counselors. **I am asking the Negotiated Rule Making Committee to maintain our current librarian and counselor ratios.**

As an educator, I can full-heartedly attest to the vital roles played by Montana's counselors and librarians. As Montanans, we need to make sure that our students, our children, have access to these support systems that are the foundation for educational success and a healthy, engaged student body.

**I would also like to request a link to Wednesday's meeting.**

Sincerely,

Hannah Telling

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My name is Steve McCormick, and I am a teacher librarian in Bozeman, Montana. I work at one of the elementary schools in the district. In Bozeman, and around the state, teacher librarians provide instruction to students, help students find reading materials, and help students grow in their academic studies. Libraries are no longer just for students to check out books. In my library alone, we work on reading skills, finding reading materials that students want to read, practice research skills with print and online materials, practice and learn valuable computer skills, evaluate websites for quality and usefulness, do the basics of coding, and introduce robotics. There is much more to libraries than just checking out books.

The presence of a certified school librarian raises student achievement in reading and writing. We can convince reluctant readers to open a book and read something that they will enjoy. School librarians also serve as partners to teachers; collaboration with classrooms has become a crucial part of the teacher librarian's job. Many teacher librarians also fill multiple roles within their schools, doing things such as running clubs, reading groups, and contributing to duties around the school community. These same things are true for school counselors and middle school elective classes. All these areas contribute to well rounded students and help with the mental health of our students. While this letter focuses mostly on the role of the school librarian, the proposed rules for counselors and middle school electives should be considered and addressed as well.

Literacy is a major focus of the Bozeman schools; I would speculate that the same focus is universal across the state of Montana. The proposed changes to school libraries as set out in the proposed rules will hurt student achievement in the state of Montana. Student reading achievement increases when the students have

a robust selection of books to check out. Many reluctant or low-level readers increase their reading skills by finding books they want to read. School librarians also teach essential skills for navigating the digital world. I ask that you carefully consider the role that school librarians have in maintaining the high quality of Montana's public schools. Please remember that school librarians play a crucial role in their school communities. These proposed changes would take most of these things away from our students. Please reject the changes proposed to library media staffing, counseling, and middle school electives in the proposed rules. Thank you for your consideration.

Steve McCormick

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Please do not eliminate the ratio of students to councilors. Our children need more help, not less.  
Thank you,  
Shae Nielsen- Billings

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I firmly believe that the Counselor to Student ratio should remain within the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 200 students as a School Counselor to students in grades 6-8th grade at Florence-Carlton School. Currently, my caseload of students signed up for services has doubled in the past year, from 25 to 53 requesting individual and group counseling. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backward, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially in rural areas, like my school. Our needs are so high and we are not able to rely on outside providers or services. Please look at the data that the state has gathered for our students, as they are in crisis. The Youth Risk Behavior Survey given to our students statewide and in our rural schools has shown an alarming increase of students reporting depressive systems and suicidal ideations. I appreciate your thoughtful consideration as this is of the utmost importance to my students and families.

Sincerely,  
Alli Bristow  
Middle School Counselor  
Florence-Carlton School District

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As a graduate student studying mental health counseling, I cannot reiterate enough the importance of providing these services for students. Students who do not have access to these services, which often include career counseling, will fall behind academically and in life. Plain and simple. School counselors provide support to students who often don't get any ANYWHERE else. Those students deserve a fighting chance and the way to give it to them is to provide support, sound advice, strengths-based approaches, and care and concern. School counselors provide all of that and more.

I strongly resist cutting these services.

Sincerely,

McKenzie Sweeney

Graduate Student in Mental Health Counseling, MSU-Billings

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Having read Superintendent Arntzen's proposed changes, I would like to emphatically and wholeheartedly ask the Montana Board of Public Education to dismiss her recommendations. Supt Arntzen's recommendations would gut music, art, world languages, and library instruction for students across the state, particularly students in rural districts who already have extremely limited access to those resources. These are content areas that are not merely enriching to students, but in fact *sustaining*. These classes and subject areas engage students in ways that math and reading simply do not. Access to these classes and instruction help students become well-rounded humans with a better understanding of their own social, emotional, and cultural well-being. These are the classes that keep kids, particularly at-risk kids, coming to school each day. To reduce, dilute, or eliminate any of them is a huge disservice to Montana students and families today and for years to come.

Superintendent Arntzen's proposed changes to school counseling ratios would also be extremely detrimental to Montana students and families. School counselors already had high caseloads before the pandemic, which has exacerbated the need for mental health support for students of all ages. By eliminating this ratio, individual students will not receive the support and care that they critically need. This lack of support often ripples outward, becoming increased behavior problems in the classroom (which classroom teachers have neither the training nor time to support properly) and decreased performance for the entire class. I have seen first hand how the behavior of just one struggling, dysregulated student can negatively impact the learning environment for them and all of their classmates. To decrease or eliminate access to mental health professionals within the school setting, especially at a time when more students are in crisis than ever before, is a cruel suggestion and counterproductive to the goal of quality public education.

These proposed staffing and curricular changes would undermine public education in Montana in so many ways. Please, for the sake of our students, for the sake of our citizens, and for the sake of the reputation of the State of Montana, do not adopt these suggested changes. Montana students, families, and communities deserve much better.

Signed,

Sarah Dramstad

K-5 Music Educator

Helena, MT

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I am a retired teacher in Missoula and feel so strongly about not changing the staffing ratio for school librarians, counselors, and any other programs as a blanket rule! I do understand the struggles of rural schools. Instead could the ratio be changed on an as-needed basis for those schools in order to protect schools that have the staff and are going strong? Those are big districts, and libraries and counselors, music, etc. is SO MUCH the glue of the school. I know from experience.

Please, please, at the Negotiated Rulemaking Committee meeting Wednesday, consider the health of the schools and do NOT vote to systematically change every teaching ratio, but rather only the schools case by case, that sadly must.

Thank you for your important work on behalf of the children in Montana.

Jennie Bucher

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Hello, I am writing to give public comment on superintendent Arntzen's recommendations to eliminate the established ratios to provide counselors and librarians to a public school. I am a teacher and a parent in Billings MT and these recommendations are not okay.

First, in the last 5 years that I have been teaching, we have constantly been in need of counselors in our school system. The mental health of our students is riddled with anxiety, and depression. This year our principal passed away in September and we would have been lost without our districts crisis team, which consists of many counselors throughout the district. They not only were there to help all 250 grieving elementary students but our staff and teachers as well.

As teachers we rely on our counselors to help us provide strategies and counsel to our students, not just some, but all. If any change needs to be made, it is that we need more counselors in each school.

Second, our students need access to books and education on how to research and access information. More than ever our librarians are more than just checking out books to students. They are the primary educator of technology and proper research as students get older. They provide an invaluable role to every school and every student.

Finally, as a parent I have a daughter who thrives in a school that supports mental health and the love of learning. By reducing the ratio of these positions you may be benefiting a budget or helping an admin who is struggling to fill these very important positions. Giving them an out is not the answer. Do what's best for kids and keep the ratios the same. Thank you.

Cassi Kutzler M.ED

5th grade teacher and parent of an anxious 3rd grader.

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Given that state and national news has been covering the current rise in children's hospitalizations due to mental health after the COVID-19 pandemic, it is completely irresponsible to weaken the requirements regarding school counselors.

And librarians provide the books and technology education for those children who cannot afford them. By eliminating librarians fewer books go home in the backpacks of children. In a time when we worry about what excessive screen time is doing to children's brains and we want children to be better more discerning consumers of information, you are going to lessen the requirement for school librarians? This not only is unfair to children experiencing poverty but weakens a future generation.

Margaret Montgomery

school psychologist

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Please..... do NOT change the numbers of librarians and counselors in our schools. Montana kids NEED them. A change such as this is taking our schools backward...

Work for kids.... Not against them.

Jane Carlson

Billings, Mt

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I was made aware of the plan to remove the requirement of a specified ratio of librarians and counselors in our Montana schools. This is absolutely horrible! Our school children have just suffered through two years of no school and social distancing with covid and we know their mental health is already in a perilous state. My mother in law was a school librarian and my father in law was the counselor in a K-12 school in rural eastern Montana and everywhere I go in this state I meet people whose lives were touched by both of these amazing educators. Librarians do so much more than help students check out books. Our students deserve to have access to counseling services and librarians. This should NOT be decreased. Our children's mental health needs to be a priority in our schools. Library services give knowledge, hope and access to important opportunities that reference materials offer to our kids. Please reconsider this devastating choice.

Sincerely,

Nancy Kinzler

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I have read the proposed changes for councilors, librarians and electives. I speak from experience as a librarian in a MT public school system for many years. If we need changes, we need more certified employees in all of the above mentioned fields. With the current standards, our students are already short changed in these fields. The proposed changes are NOT okay. Please do not give students less. They are entitled to more services.

What do other states similar to Montana provide? Please consider the needs of all of our students. There is already a heavy burden on the professionals in these areas.

We do not need a mass exodus of our valued professionals in these areas.

Thank you for considering the points I have made. Please make the right decision.

Sincerely,

Susan Hageman

Retired K-12 Librarian/Teacher

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I'm writing to express I want to see Counselor and Librarian ratios maintained. Thank you.

Tammy Walker

Bozeman MT resident and constituent who wishes to be represented

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve on average 320 students.

My "day-to-day" indirect student service duties are often put on hold to address crisis response at my school. We have faced two separate student losses in our building alone this spring. Each required our district's crisis response team to come to our building to offer additional support due to the tragic losses.

Today, I spent nearly two (2) hours with one student experiencing significant mental health concerns. We have lost our comprehensive mental health teams that served our most challenging students due to state budget cuts.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

The bottom line is Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio is putting our students' health and safety on the line. She is attempting to remove the only support that many of our highest need students have.

We can do better. We need to do better. Our children deserve better.

Sincerely,

Mandy Brottem

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I am sick at heart and stunned by Superintendent Arntzen's recommendation that Montana remove all accreditation ratio requirements for school counselors. The counselors we had prior to COVID were already stretched thin and I had hoped we were moving toward lowering the ratio of counselors to students so that we could have even more counselors in schools. Since COVID hit, we are facing a mental health crisis the likes of which our nation has never experienced in our lifetime. And our children, with their still-developing brains, have suffered more than most. They lack coping mechanisms, socialization skills, schoolwork strategies, and the means of dealing with some of the highest reported levels of stress and anxiety we have ever witnessed in kids--not to mention the fact that Montana leads the nation in our rates of teen suicide. This is a catastrophic decision that will see all these life-threatening problems exacerbated to a tragic degree. And other educators within our schools cannot simply pick up the slack of tending to our students' social and emotional well-being should we lose our counseling colleagues. We are stretched past the breaking point ourselves. Educators are leaving the field in droves. Please, I beg of you, do not make a desperate situation worse by approving the superintendent's recommendations. They ignore vital data and place our Montana children at even greater risk.

Respectfully,

Brittany Alberson Miller

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I'm writing today as both a parent, a substitute teacher, and a former student of a small school district. The changes being proposed for both library media services and counseling programs within the state of Montana is not a change I support. These are necessary services, period. Full stop. I expect better from our state than for the Office of Public Instruction to undermine the future generation of leaders/voters.

Do not make this change and then expect your constituency to place any faith in the OPI in the future.

Thank you for your time,

Mary Rose Swan

1737 Rollman Way, Billings, MT 59105

406-671-6558

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First, the proposed changes for the School Library Media and School counseling staff requirements for middle school must not happen. I am a middle school teacher and parent who has had children in our Montana Public schools. Removing the ratio of students to teacher librarians and counselors could drastically reduce the offerings to our children. For many students, libraries are a safe space where they can enjoy something outside of the core classroom. School counseling should be something we are investing more in, not taking away. The current ratio of one full time counselor for 400 students is already too high. The mental health of our children should be at the top of our list of things to invest in. If the ratio is to be changed, it should be one counselor to a maximum of 250-300 students.

Second, striking the current language for middle school requirements could open the door to drastic reductions of class offerings due to districts cutting costs. The electives are usually the first classes to go when cutting costs, it should be the exact opposite. For some students, electives are the only reasons they come to school. These classes are worth fighting for. If the language is removed from the school accreditation standards there will be an open license to stop offering some of the classes and services our students need the most.

Third, it saddens me that striking the requirement for a PE/Health class, or any other core class, is even thought to be a good idea. Health education and physical education sets our students up for a lifetime of activity and can lead to healthy lifestyles. To strike any of the core content areas from requirements would be a disservice to every student in Montana.

While some will say the language is only a change in the school accreditation standards and students will still get these classes, it opens the door for some districts to make drastic cuts to their offerings to students. If we do not protect our language and requirements, how are we guaranteeing our students the best education possible? Montana's children deserve better.

We must invest in our schools, our children, and our communities. Taking away ratios and language is not the answer. We must protect what we have and fight for more.

Thank you for your consideration,

Jennifer Schmidt

Middle School Teacher and Parent

---

I am writing in order to express my opinion about the proposed changes in ratio requirements for counselors and librarians. As a current public school teacher in East Helena, Montana, I have seen firsthand the incredible need for school counselors in our public schools. My school contains just over 450 students. We have only one full time counselor, but because of the ratio requirements, our district was required to hire another counselor that is shared with us one day a week, and then works in other buildings in the district. I wish that I could say our district would have hired another counselor anyways, but without the current ratio, the budgeted money likely would have been put elsewhere.

Even with the extra help this year, 1 full time counselor for every 400 students IS NOT ENOUGH. Our community struggles with higher suicide rates, as well as the traumas that many of our students come to school with everyday. COVID has only exacerbated these concerns. I contact our school counselor for support almost daily, for issues ranging from suicidal ideation and abuse to struggles with socials skills and emotional regulation. Due to the number of students he is responsible for, among his many other duties including being the 504 coordinator and test administrator, he is only able to respond to the most severe cases in a timely manner. We need a more stringent ratio of counselors to students, not a loosening of these standards.

Additionally, our school librarians and centrally located libraries provide necessary and engaging opportunities for our students to learn. We rely on our school librarian not only to help students check out books, but also to help us navigate new technology, everyday tech issues, and curriculum around internet safety and research skills. Most importantly, having a library centrally located in every building gives students the opportunity to access free books that they enjoy. This helps them to build a love for reading that is hopefully lifelong, and greatly improves their literacy skills they are learning from their classroom teachers.

In conclusion, I would strongly urge the committee not to adopt the proposed changes to the regulations around counselors and librarians. Students' mental health, and in some cases even their lives, hang in the balance.

Thank you for your consideration,

Jeanette Murnane

5th Grade Teacher

East Helena Public Schools

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I write this letter with fear for the future of public education and concern for the well-being of our students. I have been an educator in Montana for the past six years, and I have seen the effects that the COVID-19 pandemic has had on our society, our staff, and most importantly, our children. The shutdown has had lasting impacts on mental and emotional health. Students came back to schools dysregulated and without proficient relationship skills. It seems that more and more students come to school with trauma, which has only been exacerbated by the pandemic. Every child deserves access to counseling services. Teachers cannot do it alone. We need support. To cut these services at this time would be devastating to many families, as well as to public schools.

As we are all well aware of, reading is an essential skill and can open the door to many opportunities. Students need access to books that challenge them, help them learn, help them cope, and help them empathize. Students need books that they can relate to, so they need access to books with diversity. Without a library, this is not always possible, *especially* in rural Montana where teachers barely make a living. Many teachers, like myself, spend a great deal of their own money in their classrooms on items such as books. However, it is not fair to assume that all teachers *can* or *should* spend their own money on new books each year. Libraries are needed for success.

Again, it seems Elsie Arntzen is ready to destabilize public education. Without proper access to mental health services and libraries, our students do not have a fighting chance. Teacher burnout rates will rise even more drastically. We love teaching, we love our students, but we need these resources to adequately do our jobs. Thank you for thinking of the needs of our students.

Sincerely,

Courtney Zundel

3rd Grade

Big Sky Elementary

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Please do not decrease the ratio of librarians and counselors to kids in our schools. If anything, please increase them. These services are more important than ever to our kids post school shutdowns.

Thank you,

I am writing to you to urge you to maintain the ratio of librarian and counselors at Montana public schools.

As multi-media literacy becomes more prominent within our world, it is vital that librarians are present to help students monitor their media rich lives. Librarians develop literacy skills students will need throughout their education and into adulthood, and these skills are becoming increasingly important as media is more readily available now than it ever has been before. To limit students' access to librarians would be detrimental to Montana students as they compete in the multi-media world.

The effects of Covid have rocked the foundations of public education, and no stakeholders have had a bigger impact on helping students through these trying times than school counselors. Our counselors have quadrupled the number of students they counsel. Our children need social, emotional, and civic skills they lacked in their early life due to the restrictions of the pandemic. School counselors are needed now more than ever. Every parent and educator in Montana would agree that students' mental well-being is essential for academic learning. Limiting students' access to quality counselors would be a catastrophe for Montana.

Thank you for rejecting Supt. Artzen's harmful recommendations.

Sincerely,

Abby Kuhl

Instructional Coach

Elementary Education Teacher

Nation Board Certified Teacher candidate

Master of Elementary Mathematics

2021 Teacher of the Year Nominee

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I am a retired public school educator, having served as both teacher and principal. I cannot tell you how many times I relied on the expertise of the counselor in my schools to handle issues involving our students. The job of a school counselor is necessary, invaluable, and contributes to the efficiency of the school community, it's students and their academic success. Please do not allow the proposed reduction in counseling staff to happen in the accreditation standards of Montana's public schools.

Respectfully submitted,

Nancy Singleton

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I am writing to tell you that I completely disagree with the changes proposed by Superintendent Arntzen. As a parent of 4 children in the school system, two of which are in middle school, I cannot stress enough the importance of school counselors. Just this week, a middle school boy tragically took his own life. This alone shows that we need more mental health support in the school system, not less. I am also opposed to cutting librarians and changing the required curriculum and only offering music, foreign language and art classes as electives. I want my children to have a well rounded and broad education. These changes will greatly strain our school system and disadvantage our children. Please reconsider these changes.

Sincerely,

I recently have become aware of the recommendations by Supt Arntzen to change current accreditation standards in regards to Library Media Services and School Counseling Staff. I strongly urge the Negotiated Rule Making Committee and the Board of Education to **absolutely not support** Supt Arntzen's recommendations. Our school children are so in need of these services. With her recommendations, our rural school children would most likely not receive these valuable and needed services. It completely baffles my mind as to why she would ever propose such changes. As a daughter of public school educators, a former teacher, a former business owner, a parent of three, and a grandparent, I am very well aware of the importance of these services. It absolutely confuses me as to why a Supt of Education would even consider these changes. Please do what is best for the children of Montana and DO NOT SUPPORT SUPT ARNTZEN'S RECOMMENDATIONS.

Sincerely,

Starla Solberg

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I am writing in response to Superintendent Arntzen's recommendations to remove courses in music, visual and fine arts, career and technical education, and foreign language from the required course credit requirements in middle school. I am asking that these drastic changes, along with those recommended to reduce school-based library and counseling staff, be reconsidered as their implications would be tragic to students.

I am a parent of two middle school aged children in Helena as well as a public school teacher. In a time when the mental and emotional health of children and teens is of urgent and utmost concern we need to be doing everything we can to keep kids engaged in school and life. These "elective" classes are often the only reason that students want to be at school and often develop a love of learning within them. They are also often areas that students find areas of personal success and skill that motivates them. I fully believe that removal of these courses, course requirements, and in-house library and counseling support would have a direct detrimental effect on our students' mental health, learning, and graduation rates.

As a teacher, I have many concerns about the potential of losing our building counselors and librarians. Those two support people are 100% essential for the educational and mental health support of my students. I rely on them daily as they are often the people that have relationships with my students and help them through urgent and acute problems as well as daily check and connect relationship-building with students. As a teacher they provide an immense amount of support to me and the standards I am teaching my class.

Please reconsider these proposed changes and preserve these essential parts of middle school education.

Sincerely,

Kimberly Helseth

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After reading the recommendations of Superintendent Arntzen which would reduce student access to library services and counselors, I was truly discouraged. At a time when students are reeling from a global pandemic which disrupted their lives, every available resource should be made available to enhance learning and provide mental health services. As a Nami Missoula Board Member, I am all too familiar with the mental anguish suffered by a staggering number of our youth-- with staggering numbers ending, or attempting to end, their lives. Lowering accreditation standards that directly impact students is an appalling idea. When will the value we place in children be manifested by action and not words and empty promises? The correct answer is ***NOW.***

Thank you for your consideration.

Brenda Allington

Florence, MT

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Please maintain the librarian and counselor ratios and preserve specific electives and credit requirements for middle schools!

Respectfully,

Heidi Van Diest

3rd grade teacher

Rossiter Elementary

Helena, MT

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Our students are already in a MENTAL HEALTH CRISIS! Arntzen, School Superintendent, is trying to CUT counseling & Librarians in the schools DRASTICALLY! This is not what's in the best interest of our students, staff OR parents! Our kids need these services in EVERY school. We need to save counselors & Librarian in the schools, sometimes this is the only help & education they can get or afford!

As a parent, educator & foster parent, I have seen first hand the importance of the school counselor & Librarian has in the K-8 schools & high school. Cutting back/eliminating these MUCH NEEDED services/positions would be a travesty for the children & communities in ALL OF MONTANA. MONTANA CHILDREN DESERVE BETTER! I beg of you to NOT support this.

Thank you for your time

Heather Hitt

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Please reevaluate your support of the proposals to cut funding for librarians and counselors for schools and work to maintain ratios of librarians and counselors. In fact, work needs to be done to increase the ratios. Our students are in need of both of these services and more than ever it is the only access some of our students have to the services. It is a valuable part of education.

Ensuring equity in our school systems should be a priority in your work.

Please reevaluate your support of these proposals.

Sincerely,

Breann Streck

Park City Schools.

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My name is Kevin Cashman, a Missoula County Public School educator of 11 years.

I am writing to support our public school librarians and counselors and OPPOSE any attempt to diminish their presence in our school whatsoever.

As many before me have said, if anything now is the time to be INCREASING the number of mental health officials within our classrooms, not removing them.

Also, our school librarians, whose job is critical to helping students in our state maintain a foundational level of literacy are in need of ADDITIONAL support and funding.

Sincerely,

Kevin Cashman

---

I'm writing to you today with regard to the upcoming meeting that is proposing to change the ratios of school counselors and librarians among schools. We are in need MORE than ever to keep these KEY people in place. I am a mother of two school age children and work as a para educator in an elementary school. I'm so thankful we have a school counselor to keep our students safe and help guide through difficult situations daily. A school counselor is incredibly important in helping a school remain safe. Librarians are also extremely important in keeping students excited and curious about not only reading, but life in general. Those that are well read have more successful options in life. Isn't our job as educators and parents to help create a sustainable, healthy, good choice making society? Please do not get rid of the people that help make the world a better place.

Sincerely,

Beth Gordon

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Consider this a plea for ratios to remain the same as written previously considering the desperate need of **counselors** for children during this pandemic as well as the anger and uncertainty of the lives and conditions children are dealing with everyday.

Well rounded curriculum would not be possible without a **librarian** available in the library at all times to encourage and respect the students interests in assignments from classroom teacher as well as developing a love for reading.

Please consider the need for these ratios for needed staff and the supplies and equipment required to meet the needs of all children. Anything less would definitely jeopardize the education of children attending public schools.

Thank you for all you do for the children of Montana

Linda Bone

---

I write to oppose the changes being proposed to staffing and services in Montana public schools, especially with regard to counselors and library services.

At a time when more children are suffering mental health issues than ever before, increasing the ratio of counselors to students (and thus the caseload for counselors) will be ineffective and dangerous.

Likewise, reducing the availability of on-site librarians and media specialists, especially as our world becomes more technology driven and more complicated, is counter-productive to educating our children.

Both of these changes will be severely detrimental to Montana public schools, but maybe that is the State Superintendent's aim. As a retired teacher whose **rural** students benefited greatly from both aforementioned services, I urge you to reject these changes.

In addition, the Superintendent of PUBLIC instruction has proposed sweeping changes to the requirements for middle school education, including specific requirements for foreign language, art, music, technical skills and other exploratory classes. I point out that exposure to these subjects and activities are crucial for students and should be part of every school's offerings. Please REJECT these proposed changes as well.

Sincerely,

Jean Woessner

Missoula (formerly a teacher at Lame Deer public school, Lame Deer, MT)

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I am emailing you to strongly encourage you to say no to the recommendations in front of you to change accreditation standards for public school library media specialists and public school counselors. We must value EVERY student's need, opportunity, experience, and mental health. Keeping the ratios low are what is in the best interest of the student. Isn't that what we are here for?

Respectfully,

Marci Brown

2nd grade

Arrowhead Elementary

---

I am a retired elementary teacher with 38 years of classroom experience in Missoula. I am the mother of an elementary school counselor in Missoula and I am a 6 year volunteer in an elementary school library. I know first hand how critical these services are to young students. I also know first hand how difficult a job it is for these professionals to successfully meet student needs. Schedules are tight and hours extend well beyond the contracted day. Please look beyond the budget and consider the best provisions for the students. Listen to the experts in the field and the classroom. There you will hear the stories of children whose success as adults depends on the level of support they get at this early stage in their personhood.

Please do not rob Montana's children of access to quality professional guidance!

Barbara Bevington

Missoula

---

The importance of having mandated ratios (for both school counselors and librarians) cannot be understated and needs to remain in force in the accreditation standards. For your information, the current nationally recommended ratio of students to school counselor is 250:1.

The mandated ratio helps ensure that Montana's rising generations receive the mental health support they need.

I have worked as a school counselor for over 20 years. Many of those years were spent where the ratio was 500+:1. I spent the majority of my time in crisis response. I had little opportunity to do whole classroom lessons, or individual/small group student support.

Currently I am in a Class B size school in North Central Montana that has prioritized school counseling. My current ratio is approximately 250:1. Comparing my work to the RTI pyramid: I am able to teach weekly lessons

tailored to the general students' needs. I also have time to do intervention with those students who need extra attention, crisis response, student recognition, and other duties as assigned.

Please consider the needs of our youth, the recommendation of mental health associations, and the data. All point to the need for lower mandated ratios, not removing the requirement.

Sincerely,

Ruth Stephenson

Harlem Elementary Counselor

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I am an elementary school teacher in Columbus. I am AGAINST these proposals.

Thank you,

Pam Aumueller

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As a former elementary principal who served for 25 years at Cherry Valley elementary school in Polson, I strongly urge the retention of the current school librarian and school counselor ratios. These two positions are essential to any elementary school curriculum. The proposed changes will have devastating effects on children in rural areas. Please do not dilute these critical services.

Thank you for your thoughtful consideration of this matter and please act in the best interests of Montana's children.

Elaine Meeks, retired Principal

Cherry Valley Elementary School

Polson, Montana

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 215 number of students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Kelsey McGill

K-8 School Counselor

I am writing this letter in strong opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need.

In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 306 students. I have less students than most counselors in the state, and I have no idea how they are able to do their jobs. I am often called out of meetings, groups, and classroom lessons to address crisis response with students in need.

Although I now live and work in Bozeman, I am deeply concerned for students in our rural communities in Montana. I grew up in Glendive and later worked as a counselor in Lewistown. I understand the lack of mental health services in these areas and how school counselors are often the only professional mental health support those kids receive. School counselors are the ones who are available, can meet in person, don't require extra transportation for parents, or charge a fee that may or may not be covered by insurance. We also don't have waiting lists - we see everyone regardless. In rural areas where there is limited access to mental health care, our role is vital.

We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Jana Wagner, MA, LCPC

5-8 School Counselor

Monforton School

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I would like to communicate my concerns about Superintendent Arntzen's proposed changes to our accreditation standards to the Negotiated Rule Making Committee that will meet today.

As an elective educator in a middle school in the state of Montana, I am concerned with Ms. Arntzen replacing specific elective requirements with the broad and generic term "electives". In our globally connected world, it is critical that students have the opportunity to interact with a wide variety of subjects within the elective category. As a rural state, it is not uncommon for our students to have limited access and exposure to critical subjects that contribute to building engaged, global citizens. By removing the specific language that outlines the variety of electives students must be exposed to, we are creating the opportunity for schools to have limited, narrow elective offerings that hinder our students' education. In a rural state like ours, this guaranteed curriculum is of utmost importance. Our students must understand life outside of this state. World Languages, Music, Art, etc. all provide windows into the world that students otherwise may never have. If we are not requiring schools to provide specific offerings, we are lowering our standards and communicating that in Montana, we are okay with students having a limited education. I grew up in a rural area with limited elective

offerings and, now as a teacher in a building with a robust set of elective offerings, I see so clearly what I missed out on as a student. Equally, these elective courses are often what keep students excited about and interested in school. Our elective offerings are by far some of our most well-loved classes in our school, because they offer a different learning opportunity for students that is exciting, engaging, and hands-on in a way other classes may not be. I ask this committee to please consider that with the changes in the proposed language of our accreditation standards, we are giving schools the opportunity to lower their standards of education at the middle years level. Why would we ever consider moving backwards in educating our students? Why would we ever rob them of the opportunity to find joy in learning a wide variety of subjects outside of the core classes?

Additionally, I am concerned with the proposed changes to school's requirements for librarian and counselor staff. Librarians and counselors provide incredibly important services in our buildings; by removing student to librarian and counselor ratios, you are allowing schools to overwork undervalued employees and create shortages of services that are absolutely critical to student well being and learning. Why would we ever consider allowing less staffing in the counseling departments of schools when our youth are currently experiencing higher rates of depression and deteriorated mental health than any other time? It is an absolute disservice to our students to consider allowing higher counselor to student ratios.

While I would assume that Ms. Arntzen's proposed changes have the intention of giving schools extra flexibility in the face of challenging staffing shortages, they really just provide schools the opportunity to short change our students. Perhaps if we are struggling with staffing, we should be considering how to continue to create positive school environments where teachers are well compensated for their hard work and feel valued for what they do and offer to the citizens of this beautiful state.

Thank you for your time,

Naomi Delaloye

Middle School World Language Teacher

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I am writing to let you know that I oppose Elsie's proposed changes to schools in Montana. These changes would negatively affect students across the state. This is not the way we save money in Montana schools.

Sincerely,

Michael Tommerup

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My name is Rebecca Vondra, I am a public school teacher in one of Montana's High Schools. I understand that there is a committee meeting tonight to discuss Supt. Arntzen's recommendations for middle school credit requirements as well as librarian/counselor ratios. **I am strongly opposed to her proposed changes.**

As a high school educator, I can predict the impact these hypothetical changes will have on middle schoolers and high schoolers across the state. The programs that would inevitably head to the chopping block are invaluable to students and their educational wellbeing. I strongly urge the committee to listen to the experts - teachers. We are in touch with the state of public ed and the state of our student body. These changes will do nothing but exacerbate the issues we combat every day. Please consider the long term ramifications of these proposed changes. Please make your decisions based on what is obviously better for students, even if it opposes your bottom line. This is not the way to balance the books - there simply has to be another solution that doesn't continue to take away from the essential pieces of public education.

Best,

Rebecca Vondra

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I am writing to you to express my concern for the proposed changes to accreditation standards related to professional School Counselors in the state of Montana.

I currently serve as one of four high school counselors at Helena High School. Our caseload fluctuates from year to year, but we have been as high as 1:400 per counselor. From my own personal and professional experience, even that ratio is far too high to manage. The thought of NOT having a standard makes me feel scared and frustrated for myself, my colleagues around the state, and for the students of our state who deserve better. Rather than blowing off an accreditation standard altogether, we SHOULD be advocating to lower the ratio to the recommended American School Counselor Association standard of 1:250.

As a School Counselor, I am responsible for delivering services to my students in three key domains: Social/emotional support, academic planning, and college/career planning. This is a huge responsibility, and I can't even imagine how I would begin to fulfill this role if I was the sole counselor at my school. In addition to these services, school counselors in my district are tasked with being 504 coordinators. We assist in planning for the ACT. From start to finish, we facilitate every detail of PSAT and AP testing. We are on countless committees, attend a myriad of meetings and coordinate with teachers and administrators of a variety of student-related needs. I teach classroom lessons, and I respond to crisis situations. I teach prevention programs, like Signs of Suicide and help students plan for their post-secondary adventures. All this and then some, while meeting daily with multiple students for multiple reasons. If I was the only counselor in my building, I would not survive the job and the students would not receive the quality services they deserve.

The mental health needs of our young adults have significantly increased, especially over the past couple of years due to COVID. We've lost programs like CSCT due to lack of funding, so that void falls to the school counselors to cover. I know from the data that my department collects, 45.8% of my time every day is spent with students related to social/emotional support. Nationally, our students' mental health has suffered during the pandemic. The CDC reported that "between February and March 2021, the number of emergency department visits [nationally] for presumed suicide attempts was 50.6% higher among girls aged 12-17 compared to the same period in 2019" ([NBC Montana \[nbcmtana.com\]](http://NBC Montana [nbcmtana.com])). One in 5 American youth live with a mental health condition, and the state of Montana has ranked in the top 5 nationally for suicide completion rates for the past thirty years ([Rosston, K.](#)). In Montana's youth, suicide is the 2<sup>nd</sup> leading cause of death. Only accidents occur more frequently. According to the 2021 Montana Youth Risk Behavior Survey, "41% of high school students reported feelings of sadness or hopelessness (depression) over the last year" ([MT Y.R.B.S.](#)). This is an all-time high over the course of the past 30 years of keeping this data. Our youth are struggling more than ever, which is why the recommendation to remove ratios for school counselors in public education is unprofessional, unethical, irresponsible, and frankly, criminal. This suggested policy is a regression in the strides professional school counselors have made within schools to help advocate for and support students. A vote to support the proposed language change is a dagger in the backs of educators, students, and their families. I urge you to strike this proposal down.

Thank you for your time and thoughtful consideration.

Sincerely,

***Christina Murgel***

***School Counselor (S-Z)***

***Helena High School***

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I was alarmed to learn that Superintendent Elsie Arntzen plans to gut Montana student access to counselors, librarians, and libraries.

Please encourage the Negotiated Rule Making Committee to preserve elective and credit requirements for middle schools, and to preserve student access to critical counselor and librarian resources at all levels.

Thank you for preserving the high quality of Montana public education.

Brooke Bothner

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My name is Jason Murgel and I have been an educator in the Helena School District for the past 23 years. The last 13 years I have been a school counselor at Helena High School. As a school counselor I have experienced the joys, jubilation, heartbreak, tragedy, and struggles with many of the students I have had the pleasure of working with at Helena High. I am saddened, heartbroken, and furious Superintendent Arntzen would even consider eliminating the ratio for students to access school counselors and librarians.

If Superintendent Arntzen was a true champion of education and truly cared about the students of Montana, then she would be advocating for more resources to hire more school counselors and librarians instead of eliminating them from our public schools under her proposal. Currently Montana requires a minimum 400:1 ratio, this is still 150 more students than the American School Counselor's Association recommends (250:1). Does Superintendent Arntzen not care about the welfare and mental health of Montana's youth? Montana statistically has ranked near the top in suicide rates for the past 40 years. This past legislative session government leaders cut funding for mental health programs in our schools. Without these programs, like CSCT, most of the burden has fallen on school counselors for social and emotional support. School counselors are not therapists, but many of us find that 90% of our daily duties consist of working with students in need of social and emotional support. School counselors are to be a bridge to help students seek the support and resources students and families need. Under Superintendent Arntzen's proposal there is no way school counselors will be able to effectively do the job required of them to help students be socially, emotionally, and academically successful. If the Negotiated Rule Making Committee approves of Superintendent Arntzen's absurd recommendations, I not only worry about the well-being of Montana's students, but the well-being of school counselors and librarians in Montana!

Thank you for your time and consideration into this matter and please help the Negotiated Rule Making Committee, VOTE NO to such outlandish recommendations.

Jason Murgel

HHS Counselor

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Why anyone would even consider cutting back on counselors/mental health services right now is mind blowing, our kids need it now more than ever. Suicide, addiction and abuse is at an all time high. Public education is the backbone of our communities and we shouldn't be eliminating music, art, library, languages, tech ed requirements etc. We need these programs so our kids are exposed to and have the opportunity to become well rounded. If these cutbacks are passed we are failing our kids in Montana! Please think of the impact and do what's right for our kids. Vote NO on these cutbacks. Thank you for your time.

Rene' Ruff

Bozeman, Mt

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Please maintain the librarian and counselor ratios in our schools. These departments offer programs to our students that aren't available elsewhere. In addition, at a time when child mental health is the top headline in the news, why would reducing counselors even be considered!

Thank you,  
Nancy Francis  
Retired teacher

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. If the ratio is eliminated, administration will use school counselors for fill-in positions and under-hire for the position, creating a huge lack of support for our students. After Covid, I have seen a significant increase in our students' mental health challenges, including an increase in suicide ideation, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 289, K-8, and have two classes assigned to me that I teach on top of my duties, justified by the administration because of my caseload. I am often called out of meetings, groups, and class lessons to address crisis response at my school. This has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. This is due to legitimate studies showing the need for increased mental health services. Does Montana truly care about our education system, our kids, our future? Why then would we step backwards instead of forwards in dealing with mental health issues. Do the powers that be not want to spend the extra money it would take to hire enough mental health professionals to make a difference? Are we so greedy that we disregard the health of those we are supposed to serve to save a dollar? It is sad, and ultimately will create a declining situation from which we will not be able to recover. Please take the time needed to research and learn more about the necessity of mental health services in our public schools before you make such a huge impactful decision.

Sincerely,  
Rob Christensen MSC, MCC  
K-8 Counselor  
Thompson Falls, MT

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Please, please, please don't cut the counselors and libraries from the schools. If anything, we need more of both. With everything these children have had to overcome the last several years due to the Covid restrictions, it is doing them a disservice to cut these programs. They need to be able to talk about what is bothering them and receive guidance on things they can't cope with themselves. With libraries, reading is in every part of learning. If you can read you can't succeed. They need to keep their little imaginations flowing. They need more assistance than ever. If a student is a 3rd grader, the last "normal" school year with no masks or remote learning for them was kindergarten. The changes they had to make and adapt to does a lot to a child.

Thank you for your time,  
Krista Kolve

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I am submitting this email to voice my concerns and objection to Supt Artenzen's proposal for cuts to public education.

I have two young adults that have gone through the Billings Public Schools since kindergarten. They have received a great education, as they are both nearly ready to graduate. The cuts to counselors are troubling. I have one child that has needed those services in school. The teacher was able to see an issue at school, and had my child work with the counselor. I would not have known there was a problem, and this counselor was able to work with my child and then call me. I so appreciate this service and think cutting counselors is very concerning.

Thank you,

Marlene Hauck

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Please do not cut or scale back the librarian or counseling services in our public school. They are both vital services for the youngest members of our communities.

Mental health support is so important in all our schools, especially in the more rural areas. For many students, that is the ONLY support they have access to or can afford. Cutting services like these would be an incredible loss to our students.

Thank you for your time,

Leann Murphy

Treasurer, Jefferson Parent Council

Jefferson Elementary School

Helena, Montana

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Thank you for reading my email, I greatly appreciate it.

My children have graduated from the Helena school district many years ago and I have grandchildren in our Montana school district's.

This issue of eliminating or limiting or counselors and librarians ratio's is so upsetting to me. Every single school district needs to have counselors and librarians to help our future generation. Every child needs to have a safe place to go to for guidance. Eliminating or limiting this is only going to hinder these children. I feel that Ms.Arntzen is missing the fact that this is also our future that we are trying to protect and to raise so that these children are better equipped and educated to take care of us in our old age.

Apparently with all of her cuts that she is proposing to make she is not concerned about anyone's future. We must take care of our children, And give them a well-rounded education. And not the narrow minded education that she feels that they deserve. All of these children deserve much more than that.

Making cuts to the junior high level of the arts and music is taking away from their creativity and their learning. Not allowing them to have a more well rounded education.

Can you imagine a future in 30 years from now with absolutely no visual art and no music to soothe our thoughts and feed our minds?

I certainly can't. That may sound absurd that we wouldn't have any of that in our future, however if it is taken away and not nurtured it will disappear. Just like not teaching cursive writing to children in schools, a lot of children these days cannot even read cards that their grandparents have written them in cursive.

We must not dummy down our future generations.

Please vote against these ridiculous ideas that Ms. Arntzen tries to keep feeding everyone.

Our Montana students deserve more than this.

Thank you for your time,

Barbara Knutson

Helena Montana

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The Chapter 55 Rule Making Committee meeting agenda and recommended changes for today are concerning. I have worked in education for the past 17 years, 7 of them as a school librarian. Striking the enrollment ratios for FTE librarians and counselors is alarming. This would have a direct impact on students and not a positive one. I would hope that the rule making committee can focus on positive student impact by keeping the enrollment qualifier ratios. I am also hopeful that this same focus - positive student impact - will be considered when covering the graduation requirements and basic education program sections too.

Thank you!

K.D. Jones

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I am writing out of grave concern for the sweeping changes Superintendent Arntzen is attempting to make to accreditation standards for our state. Once again, the job of a Superintendent of Public Education is to provide "vision, advocacy, support and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities." These changes show Superintendent Arntzen, once again, cannot meet the mission which it is her sworn duty to uphold.

The first change proposed is a change to school counseling staff. Coming out of a pandemic, students are struggling with their mental health. Rather than support those needs the proposed change actually eliminates the current ratio potentially eliminating all school counseling positions. This change must be rejected.

The next change eliminates the ratio for school library media services. Librarians provide a necessary curriculum showing students research and citation skills, help select quality reading materials, and support teachers and students with technology needs. According to the Superintendent, a central library is unnecessary to education and librarians as well. Again, this change should be rejected.

Finally, the Superintendent is making sweeping changes to the requirements for middle school education as well as the specific requirements for music, foreign languages, career and technical education and other exploratory courses. Please reject these changes as well.

These changes are taking a wrecking ball to current standards and programs in our state. It is clear Superintendent Arntzen does not understand her role, nor does she care to learn how to make public schools stronger for students. These are all vital services as well as descriptors of programs that keep students engaged. They must remain in our public school system.

Sincerely,

Judith G T Carey

I am unable to join the Zoom commenting period this afternoon, so I am writing to you to voice my concerns.

As a 25 year veteran high school teacher in Montana schools, I feel strongly about many proposed changes to staffing, curriculum, and graduation requirements. There are some dangerous precedents being suggested here, and ones that do not take into account student learning needs or the interdisciplinary nature of school counselors.

First, we have a literacy achievement gap across the state. And while classroom teachers, in all content areas, are responsible for developing reading skills and a passion for reading, librarians are an essential component of that learning process. Librarians are literacy specialists and support classroom teachers, at all grade levels. Reducing the ratio of librarians to students would result in a widening of that achievement gap. Libraries are often the technology hub of a school as well, and reducing the librarian/student ratio will limit access students have to technology and instruction in essential digital citizenship. These skills are tied to critical thinking and the essential process of thinking as an individual. Our responsibility is not only to foster college and career readiness but to develop students into engaged and responsible citizens of our state and nation.

Second, counselors provide so many resources for students. They schedule students in appropriate classes and help design graduation plans; they help with the college application process and write numerous letters of recommendation; they provide emotional support for students and work and facilitate students getting outside help if they need it. Already students struggle to arrange meetings with their counselors because their student caseloads are so high. Additionally, given all the recent research that has been conducted on mental health among young people in the U.S. (and this predates the Covid pandemic), it is folly to reduce the resources we have currently. They are already inadequate - why make it worse? And teachers are already so busy, K-12, that to expect them to take on the counseling role they are not trained for is irresponsible. Removing these resources does not mean student needs will disappear, it simply means they will not be addressed, and that too is irresponsible.

Third, instead of limiting curriculum requirements in response to teacher shortages in parts of the state, let's create incentives for young teachers to work in these communities. Teaching core classes AND electives is a serious incentive for teachers. And electives often are the classes that keep students in school - all you need to do is interview students across the state and you will find that the core curriculum must be complemented by electives to make school engaging. Art, music, languages and technical classes provide breadth and depth to student learning. And, the proposed changes undermine the 2015 Every Student Succeeds Act (ESSA) which requires a 'well-rounded' education, specifically including arts and music.

These are obviously topics I am very passionate about. Education has been my devoted avocation for over two decades. I am not only a teacher, but a parent of two high school students, so I am thinking from two perspectives as I respond. We need to find better solutions to the teacher shortage problem than simply trimming learning opportunities for students. Young families have been flocking to Montana, in part because of our solid public education system. Let's make sure our new residents and our multigenerational Montana families continue to thrive in our public schools.

Sincerely,

Heidi Robison

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I am one of two School Counselors at C.S. Porter Middle School in Missoula. Our student population is just over 600 students, with high behavioral and mental health needs. I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly

believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties.

Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1, which is already inadequate. In my job, I serve over 300 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. In the past two years at Porter, we have gone from three comprehensive mental health teams to one team to serve our most challenging students due to state budget cuts. Those cuts have put more of a burden on School Counselors and other school staff to support students with mental health needs.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. By eliminating the ratio, we would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Leslie Guerreri

C.S. Porter Middle School

School Counselor

7th grade last names A-K and 8th grade

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Please do everything in your power to support the emotional and mental health of Montana's students. Now, more than ever, our young people need ready access to guidance and career counselors as well as robust, well-staffed libraries.

If we hope to send thoughtful, smart young people out into the world, we must give them support not only in academics, but in their emotional and mental development as well. In this time of great anguish and uncertainty in our world, not enough kids are receiving this support at home. Even when those home supports are present, school counselors and librarians provide an invaluable service to our kids. Decades on, I still vividly remember working through big feelings with school counselors when faced with recess squabbles in elementary school, the death of a grandparent that stole my focus in middle school, and navigating college and career choices in high school. Those supports were key in keeping me on-track academically and helping me to thrive as a well-rounded individual.

Mental health and library resources should not be stretched thin, but rather increased to best serve Montana's children, parents and all the people of the state.

Signed,

Katie Stukey Marshall

Graduate of Great Falls Public Schools

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I am writing today to encourage you to maintain librarian and counselor ratios. Now, more than ever, these positions are critical for our children. Please, please speak up for them!!!

Thank You,

Jenn Goss

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PLEASE maintain the current student librarian ratios and the school counselors. Montana students need access to these vital members of our school communities!

Thank you.

Sincerely,

Holly Fuller

Bozeman, Mt

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Thank you for this opportunity to weigh in on my concerns about the proposals in changes to staffing and accreditation standards for librarians/literacy experts and music and arts specialists.

I **object** to these proposed changes for many reasons, three of which are summarized here.

1. Suicide and mental health disorders are at an all-time high. Cutting access to trained counselors is dangerous. Teachers are not trained for this work.

2. For Montana students to have a shot at higher education and career opportunities, they need to have access to a well-rounded curriculum. Arts and Music are essential disciplines. Historically, research [[jacdavisbands.com](http://jacdavisbands.com)] bears out that music majors are admitted to medical schools in higher numbers than biochemistry majors. The discipline required to master an instrument fosters the skills needed to succeed in challenging careers requiring coordination, intelligence, planning and multi-tasking. I, for one, have a PhD in Pharmacology (studying under a Nobel Laureate) and am a professional musician. I am not unique in that my musical training allowed me to succeed in science and vice-versa. The Bozeman School District has an outstanding record of academic achievement in college and beyond; not coincidentally, it has a superior arts and music program.

3. Literacy is essential to a functioning democracy. A citizenry that cannot adequately read and write, cannot adequately make decisions essential to their family's well-being. Cutting services of librarians and literacy experts does much more damage than reducing reading and writing scores. It increases the likelihood that citizens fall prey to despots and false prophets.

There are many educators and leaders across Montana who are eager to help Montana find solutions to challenges facing our educational system. **Thank you for being willing to meet with them to consider solutions that would not endanger our youth and future generations in the manner reflected in these proposed changes.**

Warm regards,

Lori Rosolowsky, PhD

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In taking away the Librarian and Counselor Ratio you are hurting Montana! Our schools need qualified professionals in schools for our kids. Especially coming out of a pandemic when most kids are already on

anxiety and depression meds, They need a counselor! With the rate of Foster Care and kids in abusive homes, they need qualified professionals to talk to! Do not take away the ratio!

Kayla Waller

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Please, please vote to retain the librarian and counselor ratios in all our public schools! What a ridiculous idea to reduce them.

Bobbi Palagi, retired teacher/librarian

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I voice my strong opposition to many of the proposed changes OPI has recommended for school libraries, counseling, and elective courses.

As a middle school teacher and parent, all of the changes proposed in these three areas are unacceptable.

The changes will result in cuts or complete loss of many important programs. At a time when our country is reeling from the effects of COVID pandemic, cutting counseling programs is counter productive.

Our librarians are the backbone of our schools, and often the acting media specialists for our schools. Cutting technology experts along with limiting students' access to reading is also counter productive.

Lastly, as a Family Consumer Science teacher, the proposed cuts to middle school electives are completely unfounded. Our students' access to arts, music, and electives broadens their perspectives in critical ways. As we move toward career ready education, eliminating electives is a step backward.

We need forward-thinking leadership at the state level. Unfortunately, the proposals referenced above would leave our future--our students-- behind.

Please work toward the very best possible options for Montana's students rather than slashing their opportunities as recommended by OPI's misguided leadership.

Sincerely,

Carol Zimmer

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I'm writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mom to two public school students in Bozeman. I volunteer in their school with their theater program and within the classroom. I also work as a grant writer and have researched, written, and supported programs related to public health and mental health outreach across the state. I am intimately familiar with how much of a crisis we are in when it comes to mental health in Montana. Cutting back on school counselors and librarians couldn't be MORE WRONG at this moment.

Please maintain the current language and standards. What a devastating blow it would be to lose this support.

Thank you,

**Katie McLain**

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Yesterday I was notified of the potential changes that OPI is proposing to the accreditation language in several areas of public education.

It also came to my attention that these proposed changes are in direct contradiction to the School Quality Task Force recommendations. The Chapter 55 Negotiated Rule Making Committee was working in a draft language you as the Board of Public Ed. Instead, Elsie Arntzen is doing this without input from either of the committees that have been established to inform the process - and she is out of line with the timing as well. I am very concerned about these changes. I am also concerned about the way they are being proposed and pushed through without time for proper public comment. (We found out this morning, that the meeting is tomorrow, and 15 minutes is scheduled for public comment, during the school day when we are all busy)

My current role is a school counselor at Warren Elementary School in Helena, and I am incredibly concerned about the changes that are being proposed. In the past several years, our mental health concerns and crises have been on the consistent rise. From year to year, I serve between 315-350 students at a Title School. I can't begin to imagine not having a full-time counselor here at Warren, and that seems to be exactly what Elsie is proposing - WITHOUT input from committees that have been put in place! This seems awfully sneaky, and quite frankly, maddening and disgusting.

To quote Elsie Arntzen, "Now is the time to prioritize mental health in our communities and in our schools" (1), and while she was talking about using COVID funding to help keep CSCT services in some schools, She is right, now is the time to prioritize it. And yet this proposal does the opposite. Couple that with the loss of CSCT in many communities (including our school) school counselors are often the sole mental health provider in the school. You take away the requirement for each school to have one per 400 students and you will find one counselor is not enough to service all the increasing mental health needs of all students.

By removing the low bar for school counselor-to-student ratios in Montana, we are effectively doing the opposite of what she advocated for. The American School Counselor Association and the Montana School Counselor Association recommend (based on research) that a 1-250 ratio of counselors to students be the standard, we are already considerably higher in Montana at 1-400, and to remove that in a time where budgets are tight, school counselors (along with librarians and others cuts she is proposing) will be some of the first cut.

So I would like to ask the board one question? Is Mental Health a priority? If the answer is yes, you must not remove the language that requires adequate coverage of counselors or all students.

Thank you for taking the time to read my comment and I would be happy to talk further on the subject.

You can reach me at (406) 459-2260 or (406) 324-1624. Or by email at [cozburn@helenaschools.org](mailto:cozburn@helenaschools.org) or [coletteozburn@gmail.com](mailto:coletteozburn@gmail.com)

Sincerely,

**Colette Ozburn**

**School Counselor**

**Warren Elementary School**

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I'm writing to urge you to reject Superintendent Arntzen's recommendations. Dropping ratio requirements for school counselors and librarians and eliminating specific elective programs in middle schools is bad for our children.

I have a young daughter in Kalispell's public schools and she has experienced some mental health concerns since the onset of the pandemic.

We have relied on the school counselor to help her manage these concerns. She has also benefitted from the school library, bringing home books she discovered at school with the help of the school librarian.

Most concerning, however, has been the recent spike in local teen suicides. Our community is talking about the desperate need to increase youth access to counselors and threatening to reduce such access is incredibly short-sighted and detrimental to the health of our kids. For the health of my daughter and the teens at risk of suicide in our community, I urge you to keep the ratio requirements.

Furthermore, research shows that students do better in school when exposed to elective programs such as music and art. This activates different parts of their brain and helps them discover life-long talents and interests. A good, well-rounded education includes access to music, arts and other academic programs above and beyond reading, writing and STEM. Please retain these elective programs.

Thank you.

Ryan Hunter

Kalispell, MT

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I am writing to voice my disapproval of Superintendent Arntzen's proposal to remove ratio rules for librarians and counselors in our Montana public schools.

As someone who attended MT public schools for my entire education I find it very troubling that this proposal has been brought to the forefront. I'm 27 years old, I love my home state of MT, but I was failed by my school counselor because we were never taught what education/jobs we needed to pursue to be able to afford to stay in MT. Montanans are being displaced from their home every day because they can no longer afford to stay here. We need more and better services from our school counselors to prepare young Montanans to be able to work and stay in their home state. Arntzen's proposal is dangerous for Montana and dangerous for Montanans.

Sincerely,

Travis Roth

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As a mother to two children in the public school system, I feel mental health is not nearly a high enough priority and eliminating the current ratio, essentially adding a higher caseload and less resources to our children, the future generations, is a terrible mistake. Particularly now, we are seeing the impacts of the past two years on our students. The recent years have been nothing short of trauma to so many - and our children have taken the brunt of the impact. They are seeing the changes in their homes, from financial impacts to illnesses and deaths - they have lost the safety of school, having it be a place they weren't allowed to physically be in for months because it was unsafe for them....and then once they were allowed back they had to be masked and distanced from others, because again, it was unsafe for them. At the current numbers, a school of 400 students with one counselor, it allows for approximately 3, one hour visits for the entire school year. 1 hour per trimester. That should be the minimum standard for our children as they are navigating the challenges and emotions of life. And, from there, we should account for added resources to support children who are struggling with depression, family issues, suicidal thoughts, addictions, social struggles. The suggestion to go the opposite direction and give them potentially less support is truly a disservice to not only our children, but the future that we are all dependent upon.

I truly hope you reconsider the recommendation to eliminate the ratios and support us as parents, in supporting and raising healthy, well-adjusted, safe kids.

Thank you -

Jamie Hass

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I am writing to voice my disapproval at the attempt to remove important guidelines for school counselors and librarians. This proposal would harm middle school programs, counselors, and library media specialists.

Now more than ever we need library specialists to help ensure students have access to accurate information, can navigate the information environment, and learn how to critically evaluate multiple sources. Vast amounts of digital information only increases the need to teach these skills.

Montana has one of the highest suicide rates in the country. We need more mental health professionals like school counselors, not less. Children need help navigating these bewildering times.

Teachers need more support from trained specialists. Do not eliminate the current staffing ratios, this will further strain our already struggling education system.

Anne Foster

Gardiner MT

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I am disappointed to hear or your request to eliminate the student-counselor ratio. The counselor-student ratio currently makes it hard enough as it is to fully meet the needs of our students, I can't begin to imagine the negative impact your suggested cuts would make.

Here are some scenarios I would like you to consider:

The student who is in an abusive home. Thankfully, the school counselor has a positive relationship with them and was able to get them into a safe placement after they finally broke down in tears after being asked time and time again, where today's bruises came from.

The student who is homeless. Thankfully, the school counselor knows the resources that student needs to get food, a bus pass to get to school, a place to sleep, and access to clean clothes, toiletries, and a place to bathe.

The student who struggles with their social skills or building relationships. Thankfully, the school counselor has programs like "Kelso's Choices" and the "Zones of Regulation" to implement in school to help them learn and practice these skills, make new friends, and process their emotions in a healthy way.

The student who is suicidal. Did you know Montana is ranked 3rd in the nation for suicide rates? Or that in Montana, suicide is the second leading cause of death in students ages 10-14? Thankfully, the school counselor has built a relationship with this student and they feel comfortable talking through their pain and struggles, instead of taking permanent action. Thankfully, the school counselor has the outside resources to refer this student to in order to increase their means of support. How about the student who was brave enough to inform their school counselor that their friend was making suicidal statements? Thankfully, the school counselor provided a "Signs of Suicide" training to all students to help spread caution and awareness about suicide. This brave student was properly educated to notice warning signs and to tell a trusted adult, thankfully.

The student who is trying to graduate early, with honors, or graduate at all. Thankfully, the school counselor has kept them on track with classes, assignments, or simply been the reason they come to school. To many students, the school counselor is the only supportive person in their life. Imagine being 1 of 400 high school seniors trying to graduate, and the school counselor misses a required class because they had 399 other students to also tend to, then not being able to graduate.

Or the student who is dealing with the divorce of their parents and simply needs a support person. Thankfully, the school counselor knows other students in this same situation and can create a group for these students to share and process their emotions without judgement.

Imagine if there were no school counselors present to help these students? Or 1 to over 400 students, as you are suggesting? How many students are going to fall through the cracks, miss graduation, not develop positive coping skills, or attempt suicide? These are just a few of the many things school counselors are trained to help with, in addition to their other required duties. I have been working in the school system for a short 5 years, and these are the first examples I thought of where the school counselor provided assistance in a way that no other staff could. I can't imagine what would have happened to these students had the counselor not been there because they had 500 other students on their caseload to be responsible for. These are some of the things you might not think about if you weren't exposed to it. Your proposal to eliminate the ratio is going to do nothing but take away positive, available support that is critical to our students. For many of our students, this type of support is not only the only support they can afford, but the only support they have.

I strongly encourage you to not move forward with your proposal to eliminate the student-counselor ratio. What you are suggesting tells our students that they are simply a number, and not an individual person worthy of the attention and support that is rightfully theirs. Our students need their school counselors now more than ever.

Regards,

Emily Brady

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Please know as a-parent of a middle school student as well as an educator in the Montana Public School System I am appalled at the very notion of Superintendent Arntzen's proposals before you. NONE of her proposals make any sense and she is moving into a very radical state. Please think long and hard about the consequences of her proposals to the children of Montana. Our children deserve a solid education which these proposals will not give them.

Sincerely,

Diane Dowd

BSSD Instructional Coach

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I have just reviewed the proposed cuts to accreditation standards. I am amazed to see the extent of the cuts. If these are put in place there is a great chance that students will suffer and be denied access to quality educational programs. These are not cuts, they are guts, to necessary programs.

My public comment is NO to the proposed changes. We need to strengthen, not gut our schools.

You need to propose MUCH better than what is in front of you at this time.

Thank you for reading and presenting my comments,

Lisa Thomas

Teacher

Missoula Montana

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My name is Hannah Telling; I'm a high school English teacher, and I am emailing in regards Superintendent Arntzen's recommendations about ratios of students to librarians and counselors. **I am asking the Negotiated Rule Making Committee to maintain our current librarian and counselor ratios.**

As an educator, I can full-heartedly attest to the vital roles played by Montana's counselors and librarians. As Montanans, we need to make sure that our students, our children, have access to these support systems that are the foundation for educational success and a healthy, engaged student body.

**I would also like to request a link to Wednesday's meeting.**

Sincerely,

Hannah Telling

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My name is Steve McCormick, and I am a teacher librarian in Bozeman, Montana. I work at one of the elementary schools in the district. In Bozeman, and around the state, teacher librarians provide instruction to students, help students find reading materials, and help students grow in their academic studies. Libraries are no longer just for students to check out books. In my library alone, we work on reading skills, finding reading materials that students want to read, practice research skills with print and online materials, practice and learn valuable computer skills, evaluate websites for quality and usefulness, do the basics of coding, and introduce robotics. There is much more to libraries than just checking out books.

The presence of a certified school librarian raises student achievement in reading and writing. We can convince reluctant readers to open a book and read something that they will enjoy. School librarians also serve as partners to teachers; collaboration with classrooms has become a crucial part of the teacher librarian's job. Many teacher librarians also fill multiple roles within their schools, doing things such as running clubs, reading groups, and contributing to duties around the school community. These same things are true for school counselors and middle school elective classes. All these areas contribute to well rounded students and help with the mental health of our students. While this letter focuses mostly on the role of the school librarian, the proposed rules for counselors and middle school electives should be considered and addressed as well.

Literacy is a major focus of the Bozeman schools; I would speculate that the same focus is universal across the state of Montana. The proposed changes to school libraries as set out in the proposed rules will hurt student achievement in the state of Montana. Student reading achievement increases when the students have a robust selection of books to check out. Many reluctant or low-level readers increase their reading skills by finding books they want to read. School librarians also teach essential skills for navigating the digital world. I ask that you carefully consider the role that school librarians have in maintaining the high quality of Montana's public schools. Please remember that school librarians play a crucial role in their school communities. These proposed changes would take most of these things away from our students. Please reject the changes proposed to library media staffing, counseling, and middle school electives in the proposed rules. Thank you for your consideration.

Steve McCormick

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Please do not eliminate the ratio of students to councilors. Our children need more help, not less.  
Thank you,  
Shae Nielsen- Billings

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I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I firmly believe that the Counselor to Student ratio should remain within the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 200 students as a School Counselor to students in grades 6-8th grade at Florence-Carlton School. Currently, my caseload of students signed up for services has doubled in the past year, from 25 to 53 requesting individual and group counseling. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backward, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially in rural areas, like my school. Our needs are so high and we are not able to rely on outside providers or services. Please look at the data that the state has gathered for our students, as they are in crisis. The Youth Risk Behavior Survey given to our students statewide and in our rural schools has shown an alarming increase of students reporting depressive systems and suicidal ideations. I appreciate your thoughtful consideration as this is of the utmost importance to my students and families.

Sincerely,  
Alli Bristow  
Middle School Counselor  
Florence-Carlton School District

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As a graduate student studying mental health counseling, I cannot reiterate enough the importance of providing these services for students. Students who do not have access to these services, which often include career counseling, will fall behind academically and in life. Plain and simple. School counselors provide support to students who often don't get any ANYWHERE else. Those students deserve a fighting chance and the way to give it to them is to provide support, sound advice, strengths-based approaches, and care and concern. School counselors provide all of that and more.

I strongly resist cutting these services.

Sincerely,  
McKenzie Sweeney  
Graduate Student in Mental Health Counseling, MSU-Billings

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Having read Superintendent Arntzen's proposed changes, I would like to emphatically and wholeheartedly ask the Montana Board of Public Education to dismiss her recommendations. Supt Arntzen's recommendations would gut music, art, world languages, and library instruction for students across the state, particularly students in rural districts who already have extremely limited access to those resources. These are content areas that are not merely enriching to students, but in fact *sustaining*. These classes and subject areas engage students in ways that math and reading simply do not. Access to these classes and instruction help students become well-rounded humans with a better understanding of their own social, emotional, and cultural well-being. These are the classes that keep kids, particularly at-risk kids, coming to school each day. To reduce, dilute, or eliminate any of them is a huge disservice to Montana students and families today and for years to come.

Superintendent Arntzen's proposed changes to school counseling ratios would also be extremely detrimental to Montana students and families. School counselors already had high caseloads before the pandemic, which has exacerbated the need for mental health support for students of all ages. By eliminating this ratio, individual students will not receive the support and care that they critically need. This lack of support often ripples outward, becoming increased behavior problems in the classroom (which classroom teachers have neither the training nor time to support properly) and decreased performance for the entire class. I have seen first hand how the behavior of just one struggling, dysregulated student can negatively impact the learning environment for them and all of their classmates. To decrease or eliminate access to mental health professionals within the school setting, especially at a time when more students are in crisis than ever before, is a cruel suggestion and counterproductive to the goal of quality public education.

These proposed staffing and curricular changes would undermine public education in Montana in so many ways. Please, for the sake of our students, for the sake of our citizens, and for the sake of the reputation of the State of Montana, do not adopt these suggested changes. Montana students, families, and communities deserve much better.

Signed,

Sarah Dramstad

K-5 Music Educator

Helena, MT

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I am a retired teacher in Missoula and feel so strongly about not changing the staffing ratio for school librarians, counselors, and any other programs as a blanket rule! I do understand the struggles of rural schools. Instead could the ratio be changed on an as-needed basis for those schools in order to protect schools that have the staff and are going strong? Those are big districts, and libraries and counselors, music, etc. is SO MUCH the glue of the school. I know from experience.

Please, please, at the Negotiated Rulemaking Committee meeting Wednesday, consider the health of the schools and do NOT vote to systematically change every teaching ratio, but rather only the schools case by case, that sadly must.

Thank you for your important work on behalf of the children in Montana.

Jennie Bucher

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Hello, I am writing to give public comment on superintendent Arntzen's recommendations to eliminate the established ratios to provide counselors and librarians to a public school. I am a teacher and a parent in Billings MT and these recommendations are not okay.

First, in the last 5 years that I have been teaching, we have constantly been in need of counselors in our school system. The mental health of our students is riddled with anxiety, and depression. This year our principal passed away in September and we would have been lost without our districts crisis team, which consists of many counselors throughout the district. They not only were there to help all 250 grieving elementary students but our staff and teachers as well.

As teachers we rely on our counselors to help us provide strategies and counsel to our students, not just some, but all. If any change needs to be made, it is that we need more counselors in each school.

Second, our students need access to books and education on how to research and access information. More than ever our librarians are more than just checking out books to students. They are the primary educator of

technology and proper research as students get older. They provide an invaluable role to every school and every student.

Finally, as a parent I have a daughter who thrives in a school that supports mental health and the love of learning. By reducing the ratio of these positions you may be benefiting a budget or helping an admin who is struggling to fill these very important positions. Giving them an out is not the answer. Do what's best for kids and keep the ratios the same. Thank you.

Cassi Kutzler M.ED

5th grade teacher and parent of an anxious 3rd grader.

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Given that state and national news has been covering the current rise in children's hospitalizations due to mental health after the COVID-19 pandemic, it is completely irresponsible to weaken the requirements regarding school counselors.

And librarians provide the books and technology education for those children who cannot afford them. By eliminating librarians fewer books go home in the backpacks of children. In a time when we worry about what excessive screen time is doing to children's brains and we want children to be better more discerning consumers of information, you are going to lessen the requirement for school librarians? This not only is unfair to children experiencing poverty but weakens a future generation.

Margaret Montgomery

school psychologist

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Please.... do NOT change the numbers of librarians and counselors in our schools. Montana kids NEED them. A change such as this is taking our schools backward...

Work for kids.... Not against them.

Jane Carlson

Billings, Mt

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I was made aware of the plan to remove the requirement of a specified ratio of librarians and counselors in our Montana schools. This is absolutely horrible! Our school children have just suffered through two years of no school and social distancing with covid and we know their mental health is already in a perilous state. My mother in law was a school librarian and my father in law was the counselor in a K-12 school in rural eastern Montana and everywhere I go In this state I meet people whose lives were touched by both of these amazing educators. Librarians do so much more than help students check out books. Our students deserve to have access to counseling services and librarians. This should NOT be decreased. Our children's mental health needs to be a priority in our schools. Library services give knowledge, hope and access to important opportunities that reference materials offer to our kids. Please reconsider this devastating choice.

Sincerely,

Nancy Kinzler

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I have read the proposed changes for councilors , librarians and electives. I speak from experience as a librarian in a MT public school system for many years. If we need changes, we need more certified employees in all of the above mentioned fields. With the current standards, our students are already short changed in these fields. The proposed changes are NOT okay. Please do not give students less. They are entitled to more services.

What do other states similar to Montana provide? Please consider the needs of all of our students. There is already a heavy burden on the professionals in these areas.

We do not need a mass exodus of our valued professionals in these areas.

Thank you for considering the points I have made. Please make the right decision.

Sincerely,

Susan Hageman

Retired K-12 Librarian/Teacher

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I'm writing to express I want to see Counselor and Librarian ratios maintained. Thank you.

Tammy Walker

Bozeman MT resident and constituent who wishes to be represented

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve on average 320 students.

My "day-to-day" indirect student service duties are often put on hold to address crisis response at my school. We have faced two separate student losses in our building alone this spring. Each required our district's crisis response team to come to our building to offer additional support due to the tragic losses.

Today, I spent nearly two (2) hours with one student experiencing significant mental health concerns. We have lost our comprehensive mental health teams that served our most challenging students due to state budget cuts.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

The bottom line is Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio is putting our students' health and safety on the line. She is attempting to remove the only support that many of our highest need students have.

We can do better. We need to do better. Our children deserve better.

Sincerely,

I am sick at heart and stunned by Superintendent Arntzen's recommendation that Montana remove all accreditation ratio requirements for school counselors. The counselors we had prior to COVID were already stretched thin and I had hoped we were moving toward lowering the ratio of counselors to students so that we could have even more counselors in schools. Since COVID hit, we are facing a mental health crisis the likes of which our nation has never experienced in our lifetime. And our children, with their still-developing brains, have suffered more than most. They lack coping mechanisms, socialization skills, schoolwork strategies, and the means of dealing with some of the highest reported levels of stress and anxiety we have ever witnessed in kids--not to mention the fact that Montana leads the nation in our rates of teen suicide. This is a catastrophic decision that will see all these life-threatening problems exacerbated to a tragic degree. And other educators within our schools cannot simply pick up the slack of tending to our students' social and emotional well-being should we lose our counseling colleagues. We are stretched past the breaking point ourselves. Educators are leaving the field in droves. Please, I beg of you, do not make a desperate situation worse by approving the superintendent's recommendations. They ignore vital data and place our Montana children at even greater risk.

Respectfully,

Brittany Alberson Miller

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I'm writing today as both a parent, a substitute teacher, and a former student of a small school district. The changes being proposed for both library media services and counseling programs within the state of Montana is not a change I support. These are necessary services, period. Full stop. I expect better from our state than for the Office of Public Instruction to undermine the future generation of leaders/voters.

Do not make this change and then expect your constituency to place any faith in the OPI in the future.

Thank you for your time,

Mary Rose Swan

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First, the proposed changes for the School Library Media and School counseling staff requirements for middle school must not happen. I am a middle school teacher and parent who has had children in our Montana Public schools. Removing the ratio of students to teacher librarians and counselors could drastically reduce the offerings to our children. For many students, libraries are a safe space where they can enjoy something outside of the core classroom. School counseling should be something we are investing more in, not taking away. The current ratio of one full time counselor for 400 students is already too high. The mental health of our children should be at the top of our list of things to invest in. If the ratio is to be changed, it should be one counselor to a maximum of 250-300 students.

Second, striking the current language for middle school requirements could open the door to drastic reductions of class offerings due to districts cutting costs. The electives are usually the first classes to go when cutting costs, it should be the exact opposite. For some students, electives are the only reasons they come to school. These classes are worth fighting for. If the language is removed from the school accreditation standards there will be an open license to stop offering some of the classes and services our students need the most.

Third, it saddens me that striking the requirement for a PE/Health class, or any other core class, is even thought to be a good idea. Health education and physical education sets our students up for a lifetime of

activity and can lead to healthy lifestyles. To strike any of the core content areas from requirements would be a disservice to every student in Montana.

While some will say the language is only a change in the school accreditation standards and students will still get these classes, it opens the door for some districts to make drastic cuts to their offerings to students. If we do not protect our language and requirements, how are we guaranteeing our students the best education possible? Montana's children deserve better.

We must invest in our schools, our children, and our communities. Taking away ratios and language is not the answer. We must protect what we have and fight for more.

Thank you for your consideration,

Jennifer Schmidt

Middle School Teacher and Parent

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I am writing in order to express my opinion about the proposed changes in ratio requirements for counselors and librarians. As a current public school teacher in East Helena, Montana, I have seen firsthand the incredible need for school counselors in our public schools. My school contains just over 450 students. We have only one full time counselor, but because of the ratio requirements, our district was required to hire another counselor that is shared with us one day a week, and then works in other buildings in the district. I wish that I could say our district would have hired another counselor anyways, but without the current ratio, the budgeted money likely would have been put elsewhere.

Even with the extra help this year, 1 full time counselor for every 400 students IS NOT ENOUGH. Our community struggles with higher suicide rates, as well as the traumas that many of our students come to school with everyday. COVID has only exacerbated these concerns. I contact our school counselor for support almost daily, for issues ranging from suicidal ideation and abuse to struggles with socials skills and emotional regulation. Due to the number of students he is responsible for, among his many other duties including being the 504 coordinator and test administrator, he is only able to respond to the most severe cases in a timely manner. We need a more stringent ratio of counselors to students, not a loosening of these standards.

Additionally, our school librarians and centrally located libraries provide necessary and engaging opportunities for our students to learn. We rely on our school librarian not only to help students check out books, but also to help us navigate new technology, everyday tech issues, and curriculum around internet safety and research skills. Most importantly, having a library centrally located in every building gives students the opportunity to access free books that they enjoy. This helps them to build a love for reading that is hopefully lifelong, and greatly improves their literacy skills they are learning from their classroom teachers.

In conclusion, I would strongly urge the committee not to adopt the proposed changes to the regulations around counselors and librarians. Students' mental health, and in some cases even their lives, hang in the balance.

Thank you for your consideration,

Jeanette Murnane

5th Grade Teacher

East Helena Public Schools

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I write this letter with fear for the future of public education and concern for the well-being of our students. I have been an educator in Montana for the past six years, and I have seen the effects that the COVID-19 pandemic has had on our society, our staff, and most importantly, our children. The shutdown has had lasting impacts on mental and emotional health. Students came back to schools dysregulated and without proficient relationship skills. It seems that more and more students come to school with trauma, which has only been exacerbated by the pandemic. Every child deserves access to counseling services. Teachers cannot do it alone. We need support. To cut these services at this time would be devastating to many families, as well as to public schools.

As we are all well aware of, reading is an essential skill and can open the door to many opportunities. Students need access to books that challenge them, help them learn, help them cope, and help them empathize. Students need books that they can relate to, so they need access to books with diversity. Without a library, this is not always possible, *especially* in rural Montana where teachers barely make a living. Many teachers, like myself, spend a great deal of their own money in their classrooms on items such as books. However, it is not fair to assume that all teachers *can* or *should* spend their own money on new books each year. Libraries are needed for success.

Again, it seems Elsie Arntzen is ready to destabilize public education. Without proper access to mental health services and libraries, our students do not have a fighting chance. Teacher burnout rates will rise even more drastically. We love teaching, we love our students, but we need these resources to adequately do our jobs. Thank you for thinking of the needs of our students.

Sincerely,

Courtney Zundel

3rd Grade

Big Sky Elementary

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Please do not decrease the ratio of librarians and counselors to kids in our schools. If anything, please increase them. These services are more important than ever to our kids post school shutdowns.

Thank you,

Rachel Wanderscheid

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I am writing to you to urge you to maintain the ratio of librarian and counselors at Montana public schools.

As multi-media literacy becomes more prominent within our world, it is vital that librarians are present to help students monitor their media rich lives. Librarians develop literacy skills students will need throughout their education and into adulthood, and these skills are becoming increasingly important as media is more readily available now than it ever has been before. To limit students' access to librarians would be detrimental to Montana students as they compete in the multi-media world.

The effects of Covid have rocked the foundations of public education, and no stakeholders have had a bigger impact on helping students through these trying times than school counselors. Our counselors have quadrupled the number of students they counsel. Our children need social, emotional, and civic skills they lacked in their early life due to the restrictions of the pandemic. School counselors are needed now more than ever. Every parent and educator in Montana would agree that students' mental well-being is essential for academic learning. Limiting students' access to quality counselors would be a catastrophe for Montana.

Thank you for rejecting Supt. Artzen's harmful recommendations.

Sincerely,  
Abby Kuhl  
Instructional Coach  
Elementary Education Teacher  
Nation Board Certified Teacher candidate  
Master of Elementary Mathematics  
2021 Teacher of the Year Nominee

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I am a retired public school educator, having served as both teacher and principal. I cannot tell you how many times I relied on the expertise of the counselor in my schools to handle issues involving our students. The job of a school counselor is necessary, invaluable, and contributes to the efficiency of the school community, it's students and their academic success. Please do not allow the proposed reduction in counseling staff to happen in the accreditation standards of Montana's public schools.

Respectfully submitted,  
Nancy Singleton

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I am writing to tell you that I completely disagree with the changes proposed by Superintendent Arntzen. As a parent of 4 children in the school system, two of which are in middle school, I cannot stress enough the importance of school counselors. [REDACTED]. This alone shows that we need more mental health support in the school system, not less. I am also opposed to cutting librarians and changing the required curriculum and only offering music, foreign language and art classes as electives. I want my children to have a well rounded and broad education. These changes will greatly strain our school system and disadvantage our children. Please reconsider these changes.

Sincerely,  
Jessica Yeagley

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I recently have become aware of the recommendations by Supt Arntzen to change current accreditation standards in regards to Library Media Services and School Counseling Staff. I strongly urge the Negotiated Rule Making Committee and the Board of Education to absolutely not support Supt Arntzen's recommendations. Our school children are so in need of these services. With her recommendations, our rural school children would most likely not receive these valuable and needed services. It completely baffles my mind as to why she would ever propose such changes. As a daughter of public school educators, a former teacher, a former business owner, a parent of three, and a grandparent, I am very well aware of the importance of these services. It absolutely confuses me as to why a Supt of Education would even consider these changes. Please do what is best for the children of Montana and DO NOT SUPPORT SUPT ARNTZEN'S RECOMMENDATIONS.

Sincerely,  
Starla Solberg

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I am writing in response to Superintendent Arntzen's recommendations to remove courses in music, visual and fine arts, career and technical education, and foreign language from the required course credit requirements in middle school. I am asking that these drastic changes, along with those recommended to reduce school-based library and counseling staff, be reconsidered as their implications would be tragic to students.

I am a parent of two middle school aged children in Helena as well as a public school teacher. In a time when the mental and emotional health of children and teens is of urgent and utmost concern we need to be doing everything we can to keep kids engaged in school and life. These "elective" classes are often the only reason that students want to be at school and often develop a love of learning within them. They are also often areas that students find areas of personal success and skill that motivates them. I fully believe that removal of these courses, course requirements, and in-house library and counseling support would have a direct detrimental effect on our students' mental health, learning, and graduation rates.

As a teacher, I have many concerns about the potential of losing our building counselors and librarians. Those two support people are 100% essential for the educational and mental health support of my students. I rely on them daily as they are often the people that have relationships with my students and help them through urgent and acute problems as well as daily check and connect relationship-building with students. As a teacher they provide an immense amount of support to me and the standards I am teaching my class.

Please reconsider these proposed changes and preserve these essential parts of middle school education.

Sincerely,

Kimberly Helseth

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After reading the recommendations of Superintendent Arntzen which would reduce student access to library services and counselors, I was truly discouraged. At a time when students are reeling from a global pandemic which disrupted their lives, every available resource should be made available to enhance learning and provide mental health services. As a Nami Missoula Board Member, I am all too familiar with the mental anguish suffered by a staggering number of our youth-- with staggering numbers ending, or attempting to end, their lives. Lowering accreditation standards that directly impact students is an appalling idea. When will the value we place in children be manifested by action and not words and empty promises? The correct answer is **NOW.**

Thank you for your consideration.

Brenda Allington

Florence, MT

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Please maintain the librarian and counselor ratios and preserve specific electives and credit requirements for middle schools!

Respectfully,

Heidi Van Diest

3rd grade teacher

Rossiter Elementary

Helena, MT

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Our students are already in a MENTAL HEALTH CRISIS! Arntzen, School Superintendent, is trying to CUT counseling & Librians in the schools DRASTICALLY! This is not what's in the best interest of our students, staff OR parents! Our kids need these services in EVERY school. We need to save counselors & Librarian in the schools, sometimes this is the only help & education they can get or afford!

As a parent, educator & foster parent, I have seen first hand the importance of the school counselor & Librarian has in the K-8 schools & high school. Cutting back/eliminating these MUCH NEEDED services/positions would be a travesty for the children & communities in ALL OF MONTANA. MONTANA CHILDREN DESERVE BETTER! I beg of you to NOT support this.

Thank you for your time

Heather Hitt

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Please reevaluate your support of the proposals to cut funding for librarians and counselors for schools and work to maintain ratios of librarians and counselors. In fact, work needs to be done to increase the ratios. Our students are in need of both of these services and more than ever it is the only access some of our students have to the services. It is a valuable part of education.

Ensuring equity in our school systems should be a priority in your work.

Please reevaluate your support of these proposals.

Sincerely,

Breann Streck

Park City Schools.

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My name is Kevin Cashman, a Missoula County Public School educator of 11 years.

I am writing to support our public school librarians and counselors and OPPOSE any attempt to diminish their presence in our school whatsoever.

As many before me have said, if anything now is the time to be INCREASING the number of mental health officials within our classrooms, not removing them.

Also, our school librarians, whose job is critical to helping students in our state maintain a foundational level of literacy are in need of ADDITIONAL support and funding.

Sincerely,

Kevin Cashman

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I'm writing to you today with regard to the upcoming meeting that is proposing to change the ratios of school counselors and librarians among schools. We are in need MORE than ever to keep these KEY people in place. I am a mother of two school age children and work as a para educator in an elementary school. I'm so thankful we have a school counselor to keep our students safe and help guide through difficult situations daily. A school counselor is incredibly important in helping a school remain safe. Librarians are also extremely important in keeping students excited and curious about not only reading, but life in general. Those that are well read have more successful options in life. Isn't our job as educators and parents to help create a sustainable, healthy, good choice making society? Please do not get rid of the people that help make the world a better place.

Sincerely,

Beth Gordon

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Consider this a plea for ratios to remain the same as written previously considering the desperate need of **counselors** for children during this pandemic as well as the anger and uncertainty of the lives and conditions children are dealing with everyday.

Well rounded curriculum would not be possible without a **librarian** available in the library at all times to encourage and respect the students interests in assignments from classroom teacher as well as developing a love for reading.

Please consider the need for these ratios for needed staff and the supplies and equipment required to meet the needs of all children. Anything less would definitely jeopardize the education of children attending public schools.

Thank you for all you do for the children of Montana

Linda Bone [lindadbone@gmail.com](mailto:lindadbone@gmail.com)

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I write to oppose the changes being proposed to staffing and services in Montana public schools, especially with regard to counselors and library services.

At a time when more children are suffering mental health issues than ever before, increasing the ratio of counselors to students (and thus the caseload for counselors) will be ineffective and dangerous.

Likewise, reducing the availability of on-site librarians and media specialists, especially as our world becomes more technology driven and more complicated, is counter-productive to educating our children.

Both of these changes will be severely detrimental to Montana public schools, but maybe that is the State Superintendent's aim. As a retired teacher whose **rural** students benefited greatly from both aforementioned services, I urge you to reject these changes.

In addition, the Superintendent of PUBLIC instruction has proposed sweeping changes to the requirements for middle school education, including specific requirements for foreign language, art, music, technical skills and other exploratory classes. I point out that exposure to these subjects and activities are crucial for students and should be part of every school's offerings. Please REJECT these proposed changes as well.

Sincerely,

Jean Woessner

Missoula (formerly a teacher at Lame Deer public school, Lame Deer, MT)

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I am emailing you to strongly encourage you to say no to the recommendations in front of you to change accreditation standards for public school library media specialists and public school counselors. We must value EVERY student's need, opportunity, experience, and mental health. Keeping the ratios low are what is in the best interest of the student. Isn't that what we are here for?

Respectfully,

Marci Brown

2nd grade

Arrowhead Elementary

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I am a retired elementary teacher with 38 years of classroom experience in Missoula. I am the mother of an elementary school counselor in Missoula and I am a 6 year volunteer in an elementary school library. I know first hand how critical these services are to young students. I also know first hand how difficult a job it is for these professionals to successfully meet student needs. Schedules are tight and hours extend well beyond the contracted day. Please look beyond the budget and consider the best provisions for the students. Listen to the experts in the field and the classroom. There you will hear the stories of children whose success as adults depends on the level of support they get at this early stage in their personhood.

Please do not rob Montana's children of access to quality professional guidance!

Barbara Bevington

Missoula

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The importance of having mandated ratios (for both school counselors and librarians) cannot be understated and needs to remain in force in the accreditation standards. For your information, the current nationally recommended ratio of students to school counselor is 250:1.

The mandated ratio helps ensure that Montana's rising generations receive the mental health support they need.

I have worked as a school counselor for over 20 years. Many of those years were spent where the ratio was 500+:1. I spent the majority of my time in crisis response. I had little opportunity to do whole classroom lessons, or individual/small group student support.

Currently I am in a Class B size school in North Central Montana that has prioritized school counseling. My current ratio is approximately 250:1. Comparing my work to the RTI pyramid: I am able to teach weekly lessons tailored to the general students' needs. I also have time to do intervention with those students who need extra attention, crisis response, student recognition, and other duties as assigned.

Please consider the needs of our youth, the recommendation of mental health associations, and the data. All point to the need for lower mandated ratios, not removing the requirement.

Sincerely,

Ruth Stephenson

Harlem Elementary Counselor

I am an elementary school teacher in Columbus. I am AGAINST these proposals.

Thank you,

Pam Aumueller

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As a former elementary principal who served for 25 years at Cherry Valley elementary school in Polson, I strongly urge the retention of the current school librarian and school counselor ratios. These two positions are essential to any elementary school curriculum. The proposed changes will have devastating effects on children in rural areas. Please do not dilute these critical services.

Thank you for your thoughtful consideration of this matter and please act in the best interests of Montana's children.

Elaine Meeks, retired Principal  
Cherry Valley Elementary School  
Polson, Montana

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 215 number of students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Kelsey McGill  
K-8 School Counselor  
Clinton School District

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I am writing this letter in strong opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need.

In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 306 students. I have less students than most counselors in the state, and I have no idea how they are able to do their jobs. I am often called out of meetings, groups, and classroom lessons to address crisis response with students in need.

Although I now live and work in Bozeman, I am deeply concerned for students in our rural communities in Montana. I grew up in Glendive and later worked as a counselor in Lewistown. I understand the lack of mental health services in these areas and how school counselors are often the only professional mental health support those kids receive. School counselors are the ones who are available, can meet in person, don't require extra transportation for parents, or charge a fee that may or may not be covered by insurance. We also don't have waiting lists - we see everyone regardless. In rural areas where there is limited access to mental health care, our role is vital.

We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Jana Wagner, MA, LCPC  
5-8 School Counselor  
Monforton School

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I would like to communicate my concerns about Superintendent Arntzen's proposed changes to our accreditation standards to the Negotiated Rule Making Committee that will meet today.

As an elective educator in a middle school in the state of Montana, I am concerned with Ms. Arntzen replacing specific elective requirements with the broad and generic term "electives". In our globally connected world, it is critical that students have the opportunity to interact with a wide variety of subjects within the elective category. As a rural state, it is not uncommon for our students to have limited access and exposure to critical subjects that contribute to building engaged, global citizens. By removing the specific language that outlines the variety of electives students must be exposed to, we are creating the opportunity for schools to have limited, narrow elective offerings that hinder our students' education. In a rural state like ours, this guaranteed curriculum is of utmost importance. Our students must understand life outside of this state. World Languages, Music, Art, etc. all provide windows into the world that students otherwise may never have. If we are not requiring schools to provide specific offerings, we are lowering our standards and communicating that in Montana, we are okay with students having a limited education. I grew up in a rural area with limited elective offerings and, now as a teacher in a building with a robust set of elective offerings, I see so clearly what I missed out on as a student. Equally, these elective courses are often what keep students excited about and interested in school. Our elective offerings are by far some of our most well-loved classes in our school, because they offer a different learning opportunity for students that is exciting, engaging, and hands-on in a way other classes may not be. I ask this committee to please consider that with the changes in the proposed language of our accreditation standards, we are giving schools the opportunity to lower their standards of education at the middle years level. Why would we ever consider moving backwards in educating our students? Why would we ever rob them of the opportunity to find joy in learning a wide variety of subjects outside of the core classes?

Additionally, I am concerned with the proposed changes to school's requirements for librarian and counselor staff. Librarians and counselors provide incredibly important services in our buildings; by removing student to librarian and counselor ratios, you are allowing schools to overwork undervalued employees and create shortages of services that are absolutely critical to student well being and learning. Why would we ever consider allowing less staffing in the counseling departments of schools when our youth are currently experiencing higher rates of depression and deteriorated mental health than any other time? It is an absolute disservice to our students to consider allowing higher counselor to student ratios.

While I would assume that Ms. Arntzen's proposed changes have the intention of giving schools extra flexibility in the face of challenging staffing shortages, they really just provide schools the opportunity to short change our students. Perhaps if we are struggling with staffing, we should be considering how to continue to create positive school environments where teachers are well compensated for their hard work and feel valued for what they do and offer to the citizens of this beautiful state.

Thank you for your time,  
Naomi Delaloye  
Middle School World Language Teacher

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I am writing to let you know that I oppose Elsie's proposed changes to schools in Montana. These changes would negatively affect students across the state. This is not the way we save money in Montana schools.

Sincerely,  
Michael Tommerup

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My name is Rebecca Vondra, I am a public school teacher in one of Montana's High Schools. I understand that there is a committee meeting tonight to discuss Supt. Arntzen's recommendations for middle school credit requirements as well as librarian/counselor ratios. **I am strongly opposed to her proposed changes.**

As a high school educator, I can predict the impact these hypothetical changes will have on middle schoolers and high schoolers across the state. The programs that would inevitably head to the chopping block are invaluable to students and their educational wellbeing. I strongly urge the committee to listen to the experts - teachers. We are in touch with the state of public ed and the state of our student body. These changes will do nothing but exacerbate the issues we combat every day. Please consider the long term ramifications of these proposed changes. Please make your decisions based on what is obviously better for students, even if it opposes your bottom line. This is not the way to balance the books - there simply has to be another solution that doesn't continue to take away from the essential pieces of public education.

Best,

Rebecca Vondra

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I am writing to you to express my concern for the proposed changes to accreditation standards related to professional School Counselors in the state of Montana.

I currently serve as one of four high school counselors at Helena High School. Our caseload fluctuates from year to year, but we have been as high as 1:400 per counselor. From my own personal and professional experience, even that ratio is far too high to manage. The thought of NOT having a standard makes me feel scared and frustrated for myself, my colleagues around the state, and for the students of our state who deserve better. Rather than blowing off an accreditation standard altogether, we SHOULD be advocating to lower the ratio to the recommended American School Counselor Association standard of 1:250.

As a School Counselor, I am responsible for delivering services to my students in three key domains: Social/emotional support, academic planning, and college/career planning. This is a huge responsibility, and I can't even imagine how I would begin to fulfill this role if I was the sole counselor at my school. In addition to these services, school counselors in my district are tasked with being 504 coordinators. We assist in planning for the ACT. From start to finish, we facilitate every detail of PSAT and AP testing. We are on countless committees, attend a myriad of meetings and coordinate with teachers and administrators of a variety of student-related needs. I teach classroom lessons, and I respond to crisis situations. I teach prevention programs, like Signs of Suicide and help students plan for their post-secondary adventures. All this and then some, while meeting daily with multiple students for multiple reasons. If I was the only counselor in my building, I would not survive the job and the students would not receive the quality services they deserve.

The mental health needs of our young adults have significantly increased, especially over the past couple of years due to COVID. We've lost programs like CSCT due to lack of funding, so that void falls to the school counselors to cover. I know from the data that my department collects, 45.8% of my time every day is spent with students related to social/emotional support. Nationally, our students' mental health has suffered during the pandemic. The CDC reported that "between February and March 2021, the number of emergency department visits [nationally] for presumed suicide attempts was 50.6% higher among girls aged 12-17 compared to the same period in 2019" ([NBC Montana \[nbcmontana.com\]](http://nbcmontana.com)). One in 5 American youth live with a mental health condition, and the state of Montana has ranked in the top 5 nationally for suicide completion rates for the past thirty years ([Rosston, K.](#)). In Montana's youth, suicide is the 2<sup>nd</sup> leading cause of death. Only accidents occur more frequently. According to the 2021 Montana Youth Risk Behavior Survey, "41% of high school students reported feelings of sadness or hopelessness (depression) over the last year" ([MT Y.R.B.S.](#)). This is an all-time high over the course of the past 30 years of keeping this data. Our youth are struggling more than ever, which is why the recommendation to remove ratios for school counselors in public education is unprofessional, unethical, irresponsible, and frankly, criminal. This suggested policy is a regression in the strides professional school counselors have made within schools to help advocate for and support students. A vote to support the proposed language change is a dagger in the backs of educators, students, and their families. I urge you to strike this proposal down.

Thank you for your time and thoughtful consideration.

Sincerely,

**Christina Murgel**

**School Counselor (S-Z)**

**Helena High School**

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I was alarmed to learn that Superintendent Elsie Arntzen plans to gut Montana student access to counselors, librarians, and libraries.

Please encourage the Negotiated Rule Making Committee to preserve elective and credit requirements for middle schools, and to preserve student access to critical counselor and librarian resources at all levels.

Thank you for preserving the high quality of Montana public education.

Brooke Bothner

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My name is Jason Murgel and I have been an educator in the Helena School District for the past 23 years. The last 13 years I have been a school counselor at Helena High School. As a school counselor I have experienced the joys, jubilation, heartbreak, tragedy, and struggles with many of the students I have had the pleasure of working with at Helena High. I am saddened, heartbroken, and furious Superintendent Arntzen would even consider eliminating the ratio for students to access school counselors and librarians.

If Superintendent Arntzen was a true champion of education and truly cared about the students of Montana, then she would be advocating for more resources to hire more school counselors and librarians instead of eliminating them from our public schools under her proposal. Currently Montana requires a minimum 400:1 ration, this is still 150 more students than the American School Counselor's Association recommends (250:1). Does Superintendent Arntzen not care about the welfare and mental health of Montana's youth? Montana statistically has ranked near the top in suicide rates for the past 40 years. This past legislative session government leaders cut funding for mental health programs in our schools. Without these programs, like CSCT, most of the burden has fallen on school counselors for social and emotional support. School counselors

are not therapists, but many of us find that 90% of our daily duties consist of working with student in need of social and emotional support. School counselors are to be a bridge to help students seek the support and resources students and families need. Under Superintendent Arntzen's proposal there is no way school counselors will be able to effectively do the job required of them to help students be socially, emotionally, and academically successful. If the Negotiated Rule Making Committee approves of Superintendent Arntzen's absurd recommendations, I not only worry about the well-being of Montana's students, but the well-being of school counselors and librarians in Montana!

Thank you for your time and consideration into this matter and please help the Negotiated Rule Making Committee, VOTE NO to such outlandish recommendations.

Jason Murgel

HHS Counselor

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Why anyone would even consider cutting back on counselors/mental health services right now is mind blowing, our kids need it now more than ever. Suicide, addiction and abuse is at an all time high. Public education is the backbone of our communities and we shouldn't be eliminating music, art, library, languages, tech ed requirements etc. We need these programs so our kids are exposed to and have the opportunity to become well rounded. If these cutbacks are passed we are failing our kids in Montana! Please think of the impact and do what's right for our kids. Vote NO on these cutbacks. Thank you for your time.

Rene' Ruff

Bozeman, Mt

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Please maintain the librarian and counselor ratios in our schools. These departments offer programs to our students that aren't available elsewhere. In addition, at a time when child mental health is the top headline in the news, why would reducing counselors even be considered!

Thank you,

Nancy Francis

Retired teacher

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I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. If the ratio is eliminated, administration will use school counselors for fill-in positions and under-hire for the position, creating a huge lack of support for our students. After Covid, I have seen a significant increase in our students' mental health challenges, including an increase in suicide ideation, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties.

Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 289, K-8, and have two classes assigned to me that I teach on top of my duties, justified by the administration because of my caseload. I am often called out of meetings, groups, and class lessons to address crisis response at my school. This has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor

Association all advocate for increased mental health services in our schools. This is due to legitimate studies showing the need for increased mental health services. Does Montana truly care about our education system, our kids, our future? Why then would we step backwards instead of forwards in dealing with mental health issues. Do the powers that be not want to spend the extra money it would take to hire enough mental health professionals to make a difference? Are we so greedy that we disregard the health of those we are supposed to serve to save a dollar? It is sad, and ultimately will create a declining situation from which we will not be able to recover. Please take the time needed to research and learn more about the necessity of mental health services in our public schools before you make such a huge impactful decision.

Sincerely,

Rob Christensen MSC, MCC

K-8 Counselor

Thompson Falls, MT

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Please, please, please don't cut the counselors and libraries from the schools. If anything, we need more of both. With everything these children have had to overcome the last several years due to the Covid restrictions, it is doing them a disservice to cut these programs. They need to be able to talk about what is bothering them and receive guidance on things they can't cope with themselves. With libraries, reading is in every part of learning. If you can read you can't succeed. They need to keep their little imaginations flowing. They need more assistance than ever. If a student is a 3rd grader, the last "normal" school year with no masks or remote learning for them was kindergarten. The changes they had to make and adapt to does a lot to a child.

Thank you for your time,

Krista Kolve

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I am submitting this email to voice my concerns and objection to Supt Artenzen's proposal for cuts to public education.

I have two young adults that have gone through the Billings Public Schools since kindergarten. They have received a great education, as they are both nearly ready to graduate. The cuts to counselors are troubling. I have one child that has needed those services in school. The teacher was able to see an issue at school, and had my child work with the counselor. I would not have known there was a problem, and this counselor was able to work with my child and then call me. I so appreciate this service and think cutting counselors is very concerning.

Thank you,

Marlene Hauck

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Please do not cut or scale back the librarian or counseling services in our public school. They are both vital services for the youngest members of our communities.

Mental health support is so important in all our schools, especially in the more rural areas. For many students, that is the ONLY support they have access to or can afford. Cutting services like these would be an incredible loss to our students.

Thank you for your time,

Leann Murphy

Treasurer, Jefferson Parent Council

Jefferson Elementary School

Helena, Montana

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Thank you for reading my email, I greatly appreciate it.

My children have graduated from the Helena school district many years ago and I have grandchildren in our Montana school district's.

This issue of eliminating or limiting or counselors and librarians ratio's is so upsetting to me. Every single school district needs to have counselors and librarians to help our future generation. Every child needs to have a safe place to go to for guidance. Eliminating or limiting this is only going to hinder these children. I feel that Ms.Arntzen is missing the fact that this is also our future that we are trying to protect and to raise so that these children are better equipped and educated to take care of us in our old age.

Apparently with all of her cuts that she is proposing to make she is not concerned about anyone's future. We must take care of our children, And give them a well-rounded education. And not the narrow minded education that she feels that they deserve. All of these children deserve much more than that.

Making cuts to the junior high level of the arts and music is taking away from their creativity and their learning. Not allowing them to have a more well rounded education.

Can you imagine a future in 30 years from now with absolutely no visual art and no music to soothe our thoughts and feed our minds?

I certainly can't. That may sound absurd that we wouldn't have any of that in our future, however if it is taken away and not nurtured it will disappear. Just like not teaching cursive writing to children in schools, a lot of children these days cannot even read cards that their grandparents have written them in cursive.

We must not dummy down our future generations.

Please vote against these ridiculous ideas that Ms. Arntzen tries to keep feeding everyone.

Our Montana students deserve more than this.

Thank you for your time,

Barbara Knutson

Helena Montana

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The Chapter 55 Rule Making Committee meeting agenda and recommended changes for today are concerning. I have worked in education for the past 17 years, 7 of them as a school librarian. Striking the enrollment ratios for FTE librarians and counselors is alarming. This would have a direct impact on students and not a positive one. I would hope that the rule making committee can focus on positive student impact by keeping the enrollment qualifier ratios. I am also hopeful that this same focus - positive student impact - will be considered when covering the graduation requirements and basic education program sections too.

Thank you!

K.D. Jones

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I am writing out of grave concern for the sweeping changes Superintendent Arntzen is attempting to make to accreditation standards for our state. Once again, the job of a Superintendent of Public Education is to provide "vision, advocacy, support and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities." These changes show Superintendent Arntzen, once again, cannot meet the mission which it is her sworn duty to uphold.

The first change proposed is a change to school counseling staff. Coming out of a pandemic, students are struggling with their mental health. Rather than support those needs the proposed change actually eliminates the current ratio potentially eliminating all school counseling positions. This change must be rejected.

The next change eliminates the ratio for school library media services. Librarians provide a necessary curriculum showing students research and citation skills, help select quality reading materials, and support teachers and students with technology needs. According to the Superintendent, a central library is unnecessary to education and librarians as well. Again, this change should be rejected.

Finally, the Superintendent is making sweeping changes to the requirements for middle school education as well as the specific requirements for music, foreign languages, career and technical education and other exploratory courses. Please reject these changes as well.

These changes are taking a wrecking ball to current standards and programs in our state. It is clear Superintendent Arntzen does not understand her role, nor does she care to learn how to make public schools stronger for students. These are all vital services as well as descriptors of programs that keep students engaged. They must remain in our public school system.

Sincerely,

Judith G T Carey

Stevensville, Montana

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I am unable to join the Zoom commenting period this afternoon, so I am writing to you to voice my concerns.

As a 25 year veteran high school teacher in Montana schools, I feel strongly about many proposed changes to staffing, curriculum, and graduation requirements. There are some dangerous precedents being suggested here, and ones that do not take into account student learning needs or the interdisciplinary nature of school counselors.

First, we have a literacy achievement gap across the state. And while classroom teachers, in all content areas, are responsible for developing reading skills and a passion for reading, librarians are an essential component of that learning process. Librarians are literacy specialists and support classroom teachers, at all grade levels. Reducing the ratio of librarians to students would result in a widening of that achievement gap. Libraries are often the technology hub of a school as well, and reducing the librarian/student ratio will limit access students have to technology and instruction in essential digital citizenship. These skills are tied to critical thinking and the essential process of thinking as an individual. Our responsibility is not only to foster college and career readiness but to develop students into engaged and responsible citizens of our state and nation.

Second, counselors provide so many resources for students. They schedule students in appropriate classes and help design graduation plans; they help with the college application process and write numerous letters of recommendation; they provide emotional support for students and work and facilitate students getting outside help if they need it. Already students struggle to arrange meetings with their counselors because their student

caseloads are so high. Additionally, given all the recent research that has been conducted on mental health among young people in the U.S. (and this predates the Covid pandemic), it is folly to reduce the resources we have currently. They are already inadequate - why make it worse? And teachers are already so busy, K-12, that to expect them to take on the counseling role they are not trained for is irresponsible. Removing these resources does not mean student needs will disappear, it simply means they will not be addressed, and that too is irresponsible.

Third, instead of limiting curriculum requirements in response to teacher shortages in parts of the state, let's create incentives for young teachers to work in these communities. Teaching core classes AND electives is a serious incentive for teachers. And electives often are the classes that keep students in school - all you need to do is interview students across the state and you will find that the core curriculum must be complemented by electives to make school engaging. Art, music, languages and technical classes provide breadth and depth to student learning. And, the proposed changes undermine the 2015 Every Student Succeeds Act (ESSA) which requires a 'well-rounded' education, specifically including arts and music.

These are obviously topics I am very passionate about. Education has been my devoted avocation for over two decades. I am not only a teacher, but a parent of two high school students, so I am thinking from two perspectives as I respond. We need to find better solutions to the teacher shortage problem than simply trimming learning opportunities for students. Young families have been flocking to Montana, in part because of our solid public education system. Let's make sure our new residents and our multigenerational Montana families continue to thrive in our public schools.

Sincerely,

Heidi Robison

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I am one of two School Counselors at C.S. Porter Middle School in Missoula. Our student population is just over 600 students, with high behavioral and mental health needs. I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties.

Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1, which is already inadequate. In my job, I serve over 300 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. In the past two years at Porter, we have gone from three comprehensive mental health teams to one team to serve our most challenging students due to state budget cuts. Those cuts have put more of a burden on School Counselors and other school staff to support students with mental health needs.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. By eliminating the ratio, we would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Leslie Guerreri

C.S. Porter Middle School

School Counselor

7th grade last names A-K and 8th grade

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Please do everything in your power to support the emotional and mental health of Montana's students. Now, more than ever, our young people need ready access to guidance and career counselors as well as robust, well-staffed libraries.

If we hope to send thoughtful, smart young people out into the world, we must give them support not only in academics, but in their emotional and mental development as well. In this time of great anguish and uncertainty in our world, not enough kids are receiving this support at home. Even when those home supports are present, school counselors and librarians provide an invaluable service to our kids. Decades on, I still vividly remember working through big feelings with school counselors when faced with recess squabbles in elementary school, the death of a grandparent that stole my focus in middle school, and navigating college and career choices in high school. Those supports were key in keeping me on-track academically and helping me to thrive as a well-rounded individual.

Mental health and library resources should not be stretched thin, but rather increased to best serve Montana's children, parents and all the people of the state.

Signed,

Katie Stukey Marshall

Graduate of Great Falls Public Schools

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I am writing today to encourage you to maintain librarian and counselor ratios. Now, more than ever, these positions are critical for our children. Please, please speak up for them!!!

Thank You,

Jenn Goss

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PLEASE maintain the current student librarian ratios and the school counselors. Montana students need access to these vital members of our school communities!

Thank you.

Sincerely,

Holly Fuller

Bozeman, Mt

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Thank you for this opportunity to weigh in on my concerns about the proposals in changes to staffing and accreditation standards for librarians/literacy experts and music and arts specialists.

I **object** to these proposed changes for many reasons, three of which are summarized here.

1. Suicide and mental health disorders are at an all-time high. Cutting access to trained counselors is dangerous. Teachers are not trained for this work.
2. For Montana students to have a shot at higher education and career opportunities, they need to have access to a well-rounded curriculum. Arts and Music are essential disciplines. Historically, [research \[jacdavisbands.com\]](http://jacdavisbands.com) bears out that music majors are admitted to medical schools in higher numbers than biochemistry majors. The discipline required to master an instrument fosters the skills needed to succeed in challenging careers requiring coordination, intelligence, planning and multi-tasking. I, for one, have a PhD in Pharmacology (studying under a Nobel Laureate) and am a professional musician. I am not unique in that my musical training allowed me to succeed in science and vice-versa. The Bozeman School District has an outstanding record of academic achievement in college and beyond; not coincidentally, it has a superior arts and music program.
3. Literacy is essential to a functioning democracy. A citizenry that cannot adequately read and write, cannot adequately make decisions essential to their family's well-being. Cutting services of librarians and literacy experts does much more damage than reducing reading and writing scores. It increases the likelihood that citizens fall prey to despots and false prophets.

There are many educators and leaders across Montana who are eager to help Montana find solutions to challenges facing our educational system. **Thank you for being willing to meet with them to consider solutions that would not endanger our youth and future generations in the manner reflected in these proposed changes.**

Warm regards,

Lori Rosolowsky, PhD

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In taking away the Librarian and Counselor Ratio you are hurting Montana! Our schools need qualified professionals in schools for our kids. Especially coming out of a pandemic when most kids are already on anxiety and depression meds, They need a counselor! With the rate of Foster Care and kids in abusive homes, they need qualified professionals to talk to! Do not take away the ratio!

Kayla Waller

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Please, please vote to retain the librarian and counselor ratios in all our public schools! What a ridiculous idea to reduce them.

Bobbi Palagi, retired teacher/librarian

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I voice my strong opposition to many of the proposed changes OPI has recommended for school libraries, counseling, and elective courses.

As a middle school teacher and parent, all of the changes proposed in these three areas are unacceptable.

The changes will result in cuts or complete loss of many important programs. At a time when our country is reeling from the effects of COVID pandemic, cutting counseling programs is counter productive.

Our librarians are the backbone of our schools, and often the acting media specialists for our schools. Cutting technology experts along with limiting students' access to reading is also counter productive.

Lastly, as a Family Consumer Science teacher, the proposed cuts to middle school electives are completely unfounded. Our students' access to arts, music, and electives broadens their perspectives in critical ways. As we move toward career ready education, eliminating electives is a step backward.

We need forward-thinking leadership at the state level. Unfortunately, the proposals referenced above would leave our future--our students-- behind.

Please work toward the very best possible options for Montana's students rather than slashing their opportunities as recommended by OPI's misguided leadership.

Sincerely,

Carol Zimmer

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I'm writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mom to two public school students in Bozeman. I volunteer in their school with their theater program and within the classroom. I also work as a grant writer and have researched, written, and supported programs related to public health and mental health outreach across the state. I am intimately familiar with how much of a crisis we are in when it comes to mental health in Montana. Cutting back on school counselors and librarians couldn't be MORE WRONG at this moment.

Please maintain the current language and standards. What a devastating blow it would be to lose this support.

Thank you,

**Katie McLain**

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Yesterday I was notified of the potential changes that OPI is proposing to the accreditation language in several areas of public education.

It also came to my attention that these proposed changes are in direct contradiction to the School Quality Task Force recommendations. The Chapter 55 Negotiated Rule Making Committee was working in a draft language you as the Board of Public Ed. Instead, Elsie Arntsen is doing this without input from either of the committees that have been established to inform the process - and she is out of line with the timing as well. I am very concerned about these changes. I am also concerned about the way they are being proposed and pushed through without time for proper public comment. (We found out this morning, that the meeting is tomorrow, and 15 minutes is scheduled for public comment, during the school day when we are all busy)

My current role is a school counselor at Warren Elementary School in Helena, and I am incredibly concerned about the changes that are being proposed. In the past several years, our mental health concerns and crises have been on the consistent rise. From year to year, I serve between 315-350 students at a Title School. I can't begin to imagine not having a full-time counselor here at Warren, and that seems to be exactly what Elsie is proposing - WITHOUT input from committees that have been put in place! This seems awfully sneaky, and quite frankly, maddening and disgusting.

To quote Elsie Arntsen, "Now is the time to prioritize mental health in our communities and in our schools" (1), and while she was talking about using COVID funding to help keep CSCT services in some schools, She is right, now is the time to prioritize it. And yet this proposal does the opposite. Couple that with the loss of CSCT in many communities (including our school) school counselors are often the sole mental health provider in the

school. You take away the requirement for each school to have one per 400 students and you will find one counselor is not enough to service all the increasing mental health needs of all students.

By removing the low bar for school counselor-to-student ratios in Montana, we are effectively doing the opposite of what she advocated for. The American School Counselor Association and the Montana School Counselor Association recommend (based on research) that a 1-250 ratio of counselors to students be the standard, we are already considerably higher in Montana at 1-400, and to remove that in a time where budgets are tight, school counselors (along with librarians and others cuts she is proposing) will be some of the first cut.

So I would like to ask the board one question? Is Mental Health a priority? If the answer is yes, you must not remove the language that requires adequate coverage of counselors or all students.

Thank you for taking the time to read my comment and I would be happy to talk further on the subject.

You can reach me at (406) 459-2260 or (406) 324-1624. Or by email at [cozburn@helenaschools.org](mailto:cozburn@helenaschools.org) or [coletteozburn@gmail.com](mailto:coletteozburn@gmail.com)

Sincerely,

**Colette Ozburn**

**School Counselor**

**Warren Elementary School**

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I'm writing to urge you to reject Superintendent Arntzen's recommendations. Dropping ratio requirements for school counselors and librarians and eliminating specific elective programs in middle schools is bad for our children.

I have a young daughter in Kalispell's public schools and she has experienced some mental health concerns since the onset of the pandemic.

We have relied on the school counselor to help her manage these concerns. She has also benefitted from the school library, bringing home books she discovered at school with the help of the school librarian.

Most concerning, however, has been the recent spike in local teen suicides. Our community is talking about the desperate need to increase youth access to counselors and threatening to reduce such access is incredibly short-sighted and detrimental to the health of our kids. For the health of my daughter and the teens at risk of suicide in our community, I urge you to keep the ratio requirements.

Furthermore, research shows that students do better in school when exposed to elective programs such as music and art. This activates different parts of their brain and helps them discover life-long talents and interests. A good, well-rounded education includes access to music, arts and other academic programs above and beyond reading, writing and STEM. Please retain these elective programs.

Thank you.

Ryan Hunter

Kalispell, MT

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I am writing to voice my disapproval of Superintendent Arntzen's proposal to remove ratio rules for librarians and counselors in our Montana public schools.

As someone who attended MT public schools for my entire education I find it very troubling that this proposal has been brought to the forefront. I'm 27 years old, I love my home state of MT, but I was failed by my school counselor because we were never taught what education/jobs we needed to pursue to be able to afford to stay in MT. Montanans are being displaced from their home every day because they can no longer afford to stay here. We need more and better services from our school counselors to prepare young Montanans to be able to work and stay in their home state. Arntzen's proposal is dangerous for Montana and dangerous for Montanans.

Sincerely,

Travis Roth

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As a mother to two children in the public school system, I feel mental health is not nearly a high enough priority and eliminating the current ratio, essentially adding a higher caseload and less resources to our children, the future generations, is a terrible mistake. Particularly now, we are seeing the impacts of the past two years on our students. The recent years have been nothing short of trauma to so many - and our children have taken the brunt of the impact. They are seeing the changes in their homes, from financial impacts to illnesses and deaths - they have lost the safety of school, having it be a place they weren't allowed to physically be in for months because it was unsafe for them....and then once they were allowed back they had to be masked and distanced from others, because again, it was unsafe for them. At the current numbers, a school of 400 students with one counselor, it allows for approximately 3, one hour visits for the entire school year. 1 hour per trimester. That should be the minimum standard for our children as they are navigating the challenges and emotions of life. And, from there, we should account for added resources to support children who are struggling with depression, family issues, suicidal thoughts, addictions, social struggles. The suggestion to go the opposite direction and give them potentially less support is truly a disservice to not only our children, but the future that we are all dependent upon.

I truly hope you reconsider the recommendation to eliminate the ratios and support us as parents, in supporting and raising healthy, well-adjusted, safe kids.

Thank you -

Jamie Hass

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I am writing to voice my disapproval at the attempt to remove important guidelines for school counselors and librarians. This proposal would harm middle school programs, counselors, and library media specialists.

Now more than ever we need library specialists to help ensure students have access to accurate information, can navigate the information environment, and learn how to critically evaluate multiple sources. Vast amounts of digital information only increases the need to teach these skills.

Montana has one of the highest suicide rates in the country. We need more mental health professionals like school counselors, not less. Children need help navigating these bewildering times.

Teachers need more support from trained specialists. Do not eliminate the current staffing ratios, this will further strain our already struggling education system.

Anne Foster

Gardiner MT

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I am an elementary school counselor and counselor educator. I am also a licensed clinical professional counselor. As someone who works in the mental health field in several different capacities, I can't stress enough how detrimental the proposed changes would be for our kids and our society. Kids and families, especially our most vulnerable populations, need access to more mental health support, not less. Please don't leave these kids, families, and schools without the mental health support they need. Thank you for your consideration. Arianna Vokos. Elementary (K-4) School Counselor.

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Good morning. The changes proposed by OPI for both middle school curriculum, library, and counseling will hurt our students' ability to be successful in life. Middle school student deserves to have a full curriculum offered to them including ALL core subjects and a variety of electives. Students need exposure to all subject areas starting in kindergarten and the thought of schools not teaching subjects is a disservice to educating students in Montana. We cannot expect our students to be successful if they are not prepared at all levels in middle school. Schools should be held accountable to teach ALL academic areas and provide electives in all areas of visual and performing arts, CTE, and foreign language. We need to prepare our students for the future and for high school. The changes to the library/counseling student to teacher ratio only further hurts our students. I understand that small schools are at a disadvantage when hiring these positions but that doesn't mean programs should be cut. Provide exemptions for small schools to staff the library with an aide if they cannot have a full-time teacher present or if a small school needs to share a counselor. Large schools are already staffing at the minimum and our students are suffering even under the current standards and funding. We are having to utilize extra services at the COST to parents and insurance companies to serve the mental health of our students already. Students deserve access to a library at all times in their schools. Billings public schools has 22 elementary schools and 6 middle schools. The current proposal would allow Billings to have 1 librarian for all of these schools. 1 librarian at a middle school is not enough to serve 650 students. We need 1.5 to serve them appropriately. In terms of counseling, we should only be adding counselors to schools, not cutting them. A 400:1 ratio doesn't even serve the students we have now. How do we expect to serve students mental health if we do not have counselors? What is the purpose of all these changes? There is no justifiable reason to cut the programs listed above. What do we want our students to actually learn then? Why have standards if Elise just wants cut all the programs listed above and/or not require students to take BASIC education courses + a variety of electives in middle school? How do we actually expect our students to be successful in high school and later on if they are not REQUIRED to take English, math, science, and social studies each year in middle school? These questions need to be answered and not 1 educator would ever support eliminating access to education for our students. Montana needs to be better than this and should do better on behalf of our students. Thank you, Anjuli Ross.

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I would like to express my concern with the proposed recommendations made by Supt. Arntzen regarding electives in middle schools across Montana. I am also opposed to the proposals to reduce/eliminate librarian and counselor ratios, especially at a time when our children need them the most. We must never get to the point where we are watering down the education offered to our students. These proposals especially affect small schools like ours, where students have limited

opportunities already. Please do not change the language from its current state. Thank you for your time. Laura Dukart.

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I am a middle school teacher in Eureka, MT. I feel like it would be extremely detrimental to my students to remove the counselor and librarian ratios that are currently in place. Currently I feel like we need more mental health support for our students instead of less. Sincerely, Angela Price. 5th Grade Math and Science.

I am writing to express my grave concern about many of Supt. Arntzen recommended changes to the Montana school accreditation standards. I am a retired Montana teacher of over 30 years at both the Middle and High School level.

During that time, I was a very active educator that engaged myself in the impact of our educational system as a whole, continuously focusing on how to best meet our students' needs at all levels.

I am a strong believer in that it takes a village, so eliminating/reducing access to librarians and counselors at any level is ludicrous. If anything, we should be reducing our student ratio to these services and working hard to find ways to provide more counselors and librarians to help support the needs of as many students as possible. Obviously, Supt. Arntzen must not spend much time in the trenches of a functioning school to observe how important these individuals are to those schools, and more importantly the students that attend these schools. Walk in the shoes of a counselor that has to serve close to 400 students for a day or two, perhaps that might change her perspective.

I am also deeply concerned about Supt. Arntzen's proposal to strike the long list of elective requirements that are currently in place within the accreditation standards. During my 30+ years as a teacher I was a CTE teacher both at the High School, and the Middle School level. That being the case I could go on and on about the importance of these types of courses as well as the importance of providing diverse subject areas for our youth. Eliminating these requirements just opens the door to a continued

degradation of the educational opportunities we are providing for our students. I can't believe that any citizen of Montana wants that for our youth.

I am struggling to understand why any of these changes are being proposed, other than to continue to degrade our fine public schools and make it easier to operate private schools that might not be able to provide the wide range of diversity that our students of today need.

Please do not support these proposed changes that slash educational opportunity, and instead let's work towards how we can increase educational opportunity and support for our Montana students. Sincerely, Jamie Isaly. Retired Teacher & Education Advocate.

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I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. The licensed School Counselor to Student ratio should remain in the accreditation standards to ensure that every Montana's student receive the academic, mental, behavioral health, and career development support they so desperately need.

In the last two years we have seen a significant increase in our students' behavioral health challenges in Montana, including an increase in suicidality, depression, and anxiety as well as the resulting

school truancy, increased substance use and poor academic achievement that occurs from these difficulties. These alarming statistics are verified in the 2021 Montana Youth Behavioral Risk Survey that was generated by the Montana Office of Public Instruction (report attached to this email). The following quote is taken directly from the American School Counseling Associations' professional position statement: "All schools and communities have students who could potentially drop out of school and/or engage in destructive behaviors such as absenteeism, performing below their potential academically, substance abuse, bullying, cyberbullying, suicidal ideation, physical violence or engaging in self-harm and other destructive or dangerous behaviors. Additionally, schools and communities have environmental, resource or policy issues inadvertently contributing to student failure and harmful behaviors (Holcomb-McCoy, 2007). These behaviors can have devastating lifelong implications and often stem from social/ emotional concerns including: low self-esteem, family and relationship problems, grief, trauma, neglect, abuse and/or substance use. Implementing trauma-informed practices helps staff with interventions while maintaining sensitivity to students (Haviland, 2017). The prevailing research has and continues to maintain that an in-school licensed School Counselor who mentors students and implements programs prevents against these dangerous risk factors and is a protective factor in students' lives! (Black, Grenard, Sussman, Rohrback, 2010).

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Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. This accreditation standard guarantees every Montana student has access to a School Counselor and a developmentally appropriate school

counseling program which is teaching adaptive coping skills and builds resiliency. This is a protective factor and an educational right of Montana children.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. Montana would be going backwards if the ratio is eliminated. The school-based CSCT programs have already been cut by the state-- this decision has the potential to eliminate any behavioral health support in the schools which would burden an already taxed educational system.

As 20-year Montana educator, I vehemently oppose Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio in Montana schools. Her recommendation is not in the best interest of Montana students. Sincerely, Dr. Katey T. Franklin, PhD, Licensed School Counselor.

I strongly oppose Superintendent Arntzen's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. If passed, these changes will negatively impact students in our state. School librarians improve literacy rates by instilling a lifelong love of reading, making personalized book recommendation and encouraging reluctant readers. In addition, they teach students to be digitally literate, helping students use technology safely, ethically and responsibly. They facilitate multidisciplinary connections between departments and assist with research, ensuring that students are prepared for college and other career paths. Librarians ensure students are equipped with 21st century skills and are future ready.

To do away with the ratio will be detrimental to students and schools in the state of Montana. For these reasons, I strongly oppose these proposed changes. Sincerely, Noelle Harper.

Please maintain librarian and counselor ratios. I DO NOT SUPPORT THE CHANGES. Danielle Shyne.

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I am writing to express my disappointment in the thought of eliminating the ratio of school counselors in our schools. Mental health is real and it's in ALL grade levels. Access to counselors is CRUCIAL and should not be lessened, rather it should be increased. I am a parent of two teenage daughters who have both BENEFITED from their school counselors who have helped them realize they are worth living for. Please reconsider this change immediately and do NOT eliminate the ratio of school counselors. Kristin Grant. Billings, MT.

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I am opposed to the proposed changes.

Librarians provide a critical role in children's education. They serve as a resource for many areas from recommendations to research. Eliminating the ratios of librarian to students will make them less effective and reduce their success in assisting students' education.

Eliminating the ratio for counselors at a time when depression across the board is at an all time high is reckless. Montana has an extremely high suicide rate. 400 to 1 is a high number for counselors to manage is already inadequate. Eliminating that ratio will take their assistance away from those who need it most. There continues to be more issues facing families and having access to counselors in the schools is needed now more than ever.

Eliminating the requirements for music and arts is a huge mistake. These classes are critical for a child's learning. Some children have only this to expand their knowledge and interest. It's racial that these continue to be required. Terrie Casey.

The reduction of in district mental health services is EXTREMELY detrimental!! Every single student I work with on a daily basis NEEDS these services. They will not be provided outside of school by parents/guardians. The mental health of our students is the last thing we should be pushing to the side!! All this will do is push our students into adulthood with long term mental health issues that SHOULD be addressed at the elementary level. This is an ABSOLUTLY OUTRAGIOUS proposal!!! Anyone that votes for this obscene proposal truly has no compassion for the next generation. Shelby Tefft.

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I am writing to urge you to reject Elsie Arntzen's recommendation to do away with required staffing ratios for school librarians and counselors. Making the change for small rural schools would perhaps be beneficial, but making a sweeping, statewide change is irresponsible. It lessens the quality of education the students of Montana receive. Thank you for your consideration. Lisa Brennan.  
Missoula, Montana

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I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school

librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. Yours sincerely, Stacey Hubbel.

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I am an elementary school counselor and counselor educator. I am also a licensed clinical professional counselor. As someone who works in the mental health field in several different capacities, I can't stress enough how detrimental the proposed changes would be for our kids and our society. Kids and families, especially our most vulnerable populations, need access to more mental health support, not less. Please don't leave these kids, families, and schools without the mental health support they need. Thank you for your consideration. Arianna Vokos. Elementary (K-4) School Counselor.

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I am writing to express my disappointment in the thought of eliminating the ratio of school counselors in our schools. Mental health is real and it's in ALL grade levels. Access to counselors is CRUCIAL and should not be lessened, rather it should be increased. I am a parent of two teenage daughters who have both BENEFITED from their school counselors who have helped them realize they are worth living for. Please reconsider this change immediately and do NOT eliminate the ratio of school counselors. Kristin Grant. Billings, MT.

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I am opposed to the proposed changes.

Librarians provide a critical role in children's education. They serve as a resource for many areas from recommendations to research. Eliminating the ratios of librarian to students will make them less effective and reduce their success in assisting students' education.

Eliminating the ratio for counselors at a time when depression across the board is at an all time high is reckless. Montana has an extremely high suicide rate. 400 to 1 is a high number for counselors to manage is already inadequate. Eliminating that ratio will take their assistance away from those who need it most. There continues to be more issues facing families and having access to counselors in the schools is needed now more than ever.

Eliminating the requirements for music and arts is a huge mistake. These classes are critical for a child's learning. Some children have only this to expand their knowledge and interest. It's racial that these continue to be required. Terrie Casey.

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The reduction of in district mental health services is EXTREMELY detrimental!! Every single student I work with on a daily basis NEEDS these services. They will not be provided outside of school by parents/guardians. The mental health of our students is the last thing we should be pushing to the side!! All this will do is push our students into adulthood with long term mental health issues that SHOULD be addressed at the elementary level. This is an ABSOLUTLY OUTRAGIOUS proposal!!! Anyone that votes for this obscene proposal truly has no compassion for the next generation. Shelby Tefft.

I am writing to urge you to reject Elsie Arntzen's recommendation to do away with required staffing ratios for school librarians and counselors. Making the change for small rural schools would perhaps be beneficial, but making a sweeping, statewide change is irresponsible. It lessens the quality of education the students of Montana receive. Thank you for your consideration. Lisa Brennan.

Missoula, Montana

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I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. Yours sincerely, Stacey Hubbel.

Hello.

My name is Aaron Schendel. I have been a music teacher in Billings for 22 years. I believe the proposed changes to the Middle School requirements are dangerous and demonstrates a political agenda that does active harm to our students and community.

Students must have the fine arts and career education introduction as early as possible. I really have much more to say, but I am in the middle of my school day in the 5 minutes I have to eat, use the facilities and help students. Please contact me. I want to be helpful in forming solutions and I don't understand why this seems to be an issue for Montana.

Aaron W. Schendel

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Dear Tristen Loveridge,

In reading Supt. Arntzen's proposal recommending the elimination of specific elective programs and credit requirements in middle schools, I am appalled. Her proposal prevents student access to music, visual arts, career education, and many other courses, while diluting the quality of education offered as a whole.

A healthy society includes individuals with a vast array of skills and appreciation for all forms of education that embody our greater culture.

This is just another attempt at stripping the values of public education so Supt. Arntzen can further push her agenda to privatize education in Montana, which is a violation of our state Constitution that guarantees access to high quality public education. I cannot fathom someone arguing how a middle school curriculum void of all the cuts Ms. Arntzen proposes, could be deemed "quality."

Please preserve these electives and credit requirements that guarantee a high quality education for all Montana students, which is the foundation for our state's future.

Thank you,

Adam Clinch

Lewis and Clark County Resident

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My name is Alex Holmes. I don't even have children and the thought of cutting counseling in Montana schools is absolutely absurd. I live in the Flathead County and remember the many suicides that happened in our a few areas high schools last year. Everyone pushed for more help but this meeting you're hosting tomorrow is about cutting those resources? This is unacceptable in every way. Coming off a destroyed economy following covid, these children are still struggling with life at home, school, and social circles. The least we could do for future generations is give them a place to vent. If anything, we should have MORE counselors available to them. Please consider this when making your decision tomorrow. Thank you.

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Hi Tristen,

I'm asking the Rule Making Committee to reject the recommendations to eliminate ratios for counselors and librarians in Montana public schools. These are essential services to students and these changes would disproportionately affect rural and poor students. I object to these recommendations in the strongest terms.

Thank you for your consideration,

Anastasia Orkwiszewski

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Hi Tristen & Committee,

I've emailed once before, but want to reiterate how damaging and short sighted the proposed changes 10.55.709 and 10.55.710 are to students. Limited access to qualified librarians and counselors may save some districts money, but will do nothing to help our students who need people and places of connection (as per the Mental Health Report the state received ~1 month ago). During the last session, someone asked if districts had ever been penalized for not having the required librarian staffing, to which the answer was "not that anyone was aware of". Perhaps the committee should look at requiring districts to advertise the positions to the best of their ability and, if those positions go unfilled, the waiving the penalty for that school year, or as long as the posting stays active on OPI.

Again, I think the changes are short sighted and reactive instead of proactive. I would hope that the committee would exhibit more creativity and problem solving skills in their search for a solution.

Thank you,

Andrea

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Please maintain the student ratios for librarians and counselors. Doing away with the ratios will greatly affect services to our rural students in Montana. We are underserved in the area of counseling services and libraries in small towns already and not maintaining the ratio could take away another resource for our kids.

Angela Pierce

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Hello. Coming from a mom of 5 children I believe that we need more counselors for our schools!!! Things have never been more difficult for our children and their mental health!! Please please help us keep counselors in our schools!! They are greatly needed!! Thank you!--

Angie Bower

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We want librarians and counselors in our schools.

Anna Geary

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Mrs. Loveridge,

Superintendent Arntzen's proposed changes to the mandated library access and access to counselors in schools will be detrimental to the educational experience of all students.

For many rural communities, as well as schools in lower socioeconomic neighborhoods, their school library is one of their best resources to access books they may not be able to afford, especially books that are geared toward their particular learning needs and abilities. As far as counseling access is concerned, the current ratio of 1 counselor for every 400 students is not nearly enough to support students as it is, but it is at least a minimum level that we have worked with for many years.

Doing away with the minimum ratio for counseling access is bad for the well being of students at best, and dangerous at worst. Counselors are sometimes the last line of defense when trying to prevent school violence, student self harm. Aside from that, counselors play many other invaluable roles within the school and are trained to deal with non-school related issues that most Certified Staff are not. On those grounds, I urge you to reject the proposed changes to the Library and Counselling mandated minimum ratios in the State of Montana.

Sincerely,

Anthony Hammond

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Hello,

I am hoping these comments can be added to the meeting regarding eliminating the ratios for Librarians and school counselors.

Having taught in a Class C school and a Class AA school I can tell you that both library media specialists and school counselors are a necessary and vital part of a school community. These are adults specifically trained in their fields to help kids navigate technology and mental health—two areas that are evolving and impacting our young people on a large scale. If you cut the ratios and allow/force schools to cut these positions you will see a vast disengagement from students, more burned out teachers, and a shift in school cultures. Please do not change the ratios for these positions. Teachers, staff, and students are already working with limited resources and demanding jobs, if you take aways the ratios you will be doing a disservice to every community stakeholder.

Best,

Ashley Wineman

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To whom it may concern,

I am a 4th Grade Teacher at Lewis and Clark Elementary in Missoula, Montana. I firmly oppose Elise Arntzen's recommendations for changes to school accreditation standards, specifically in relation to counselors and school librarians.

This is the worst time to be eliminating the student/counselor ratio in our schools. The last two years have been incredibly challenging for students, families, and teachers and we NEED more counseling services available to students. There are several students in my class who have weekly check ins or groups with our counselor. These students would not have the same level of academic success without the time, space, and personnel to process and reflect on their emotions and behaviors. I do not have the time or space to meet the needs of all of these kids. They, now more than ever, need access to mental health services.

If we want student reading engagement and success, it is critical that schools and students have a librarian. Eliminating Montana students' access to a librarian negatively impacts students and teachers. All students should have access to a school librarian that can ignite their passion for reading.

I do believe there are many hurdles to accreditation and I agree that the accreditation process could be made more efficient. However, eliminating certain school staff positions will ultimately impact teachers in classrooms who have to become counselors and librarians in addition to being a full-time teacher. We can't do it all.

If anything, accreditation standards in school should be elevated (in addition to compensation for ALL school staff, excluding administration). I believe the primary barrier to keeping Montana schools staffed is that school staff are overworked and underpaid. Why work in a school when you can make more money at a fast food chain? Schools should honor the hard work and experience of seasoned para educators and long term substitutes, and look for pathways to accreditation for those people. We should not be lowering (eliminating) the standards for educators, but raising them.

Sincerely,

Audrey Harper

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Hi Tristen,

Please include my comment (below) for the Negotiated Rulemaking Committee meeting tomorrow:

As a certified English teacher (secondary) and a MT Certified Teacher Librarian (K-12) with National Board Certification, and a parent, I have serious concerns about adjusting the MT School Librarian & Counselor requirements under Chapter 55.

- I am concerned Superintendent Arntzen is gutting the ratio requirement for School Librarians and Counselors with either no forethought or actual intent to harm our students. Without requirements, districts or "systems" will be cutting necessary positions. Weakening the requirements and expecting rural (or any!) school system to provide more positions than

called for by State requirements is ultimately bad for students and teachers. This is clearly a CUT to important positions in our schools.

- The Superintendent's broad cuts were added in after the Task Force met and counter to their recommendations and discussion, without appropriate review by representative stakeholders, and at one of the very busiest times of year for school staff. This feels like a dirty attempt to slip this in without taking time to listen to actual students, families, and staff. I have a filling cabinet and email folder full of thank yous, student notes, etc. that show my impact on students, and I'm positive our counselors have the same.
- While I understand we are concerned about rural areas filling certain positions, this is not the answer to that problem. Schools failing to meet the requirements and earning a deficiency (with no budgetary impact) provides useful information to the OPI. All of our students, staff, and families deserve access to well-prepared, high-quality school librarians and counselors and fully-funded school libraries, regardless of where in MT they live.

School libraries and librarians are essential to preparing our students for their futures. Myriad studies confirm that school librarians support student achievement and increased funding for school libraries leads to rising reading scores. Each year, my district's Teacher Librarians work with thousands of classes and individuals, helping students with research and critical thinking, and working with them to develop skills to select, evaluate, and use information effectively, and be creators, not just consumers, of content.

Our Teacher Librarians serve on building and district leadership teams, provide technology-training and professional development to staff, run book clubs, lunch clubs, literacy programs, and more. I collaborate with Science classes, English, Government and World Geography classes, Health/PE, World Languages, and more. While we might tend to work behind the scenes and not take enough credit, Teacher Librarians serve important roles in every school, and it would be a huge disservice to our students and families to reduce their impact through this change.

Thank you for your time, Rebecca Dupre

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Dear Tristen Loveridge,

I'm writing to voice my opinions on the proposed changes to Rules 10.55.709 and 10.55.710, in regards to requirements for school librarians and counselors.

As the husband of a public school teacher and a member of MFPE, I must say that Superintendent Arntzen's proposed changes will be harmful to schoolchildren throughout Montana, particularly those in rural districts who may already be underserved. Without basic staffing requirements schools would be free to downsize or eliminate individuals in these positions, and many would surely do so to trim costs. Having these rules in place, as-is, provides a mechanism to hold schools accountable for providing basic, adequate services for students.

Library services are critical to the education of today's students, since this is the setting where many students are also exposed to and instructed in the use of computers and information technology; depriving them of adequate access to library facilities and qualified professionals would deprive students of skills they will need to succeed in modern work, skills desperately needed in Montana. Similarly, counselors serve an essential role in the fabric of K-12 education, providing services and

guidance that help all students succeed. Without an adequate number of counselors, schools will be unable to support students struggling with poverty, mental health, or making the transition to post-secondary education or training.

We all know that staffing levels in public schools are already at critical levels; my wife frequently worries how the public schools in our area will find enough qualified staff willing to fill the open positions. The answer is not to loosen the requirements or lower our expectations of public education, to give up and shrug and say that such basic staffing levels are unattainable. Instead, we should continue to hold schools accountable, expect a quality education for all students in Montana, and implement policies that help schools reach these goals. She also routinely sings the praises of librarian and counseling staff, and I know that having less of these professionals on staff would be harmful to students, other teachers, and public schools as a whole.

Finally, as a member of MFPE, I cannot help but fear for my fellow members, the remaining counselors and librarians who would bear a large part of the burden of understaffing. These people are already overworked, and making changes that could lead to even more pressure on them is cruel, disrespectful, and also counterproductive, since it would likely lead to even more people leaving the profession and drive staffing levels even lower.

The right, respectful, and fair thing to do, for students, public education professionals, and the community at large, is to help our public schools get to a place where they can meet the staffing requirements as they are, instead of lowering our standards and conceding that Montana schools offer second-rate education and learning environments.

Thank you for your consideration,

-Ben Polk

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Good Afternoon,

We are emailing to provide public comment related to Supt. Arntzen's latest recommendations involving school counselor ratios.

We were surprised to hear that a recommendation has been put forth to remove the required school counselor ratios. Speaking as high school counselors, we can say this would be a detriment to all students. We currently work in a high school of just over 500 students. We have 2 full time school counselors, and it is still very difficult to provide the necessary services to all students. Mental health concerns are increasing every year, and if the current ratio is eliminated, the problem will grow further. Rather than eliminate school counselor ratios, Montana needs to implement the national recommendation of 250:1. To do otherwise is choosing to neglect the needs of MT students. At the very least, the school counselor ratio standard should remain in the standards.

Thank you for considering the opinions of current school counselors,

Beth Terzo and Robyn Richardson

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Please maintain the librarian and counselor ratios and keep specific electives. Students need counselors and librarians. Reducing the number would hurt students. Likewise, students need liberal education to serve their humanity. Cutting things like music, art and drama leave students lacking outlets for creativity.

Providing opportunities for people, especially young people, to participate in the arts can be educational but far more importantly the experience feeds their humanity. Even before Covid hit us, the stress of a rapidly changing world was impacting our community. Young people in particular were and are overwhelmed with stress and anxiety. They are told that what matters, what is most important, is testing and career preparation. The arts are frivolous and unnecessary. This couldn't be further from the truth. Art is necessary. It is vital to our survival. Human beings need an outlet for creativity, opportunities for emotional release, and a chance for escape.

Thank you for your time,

Betty Thiel

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The proposed changes to these 2 endorsements are simply and categorically ridiculous. As a retired teacher with 30 years of classroom experience, I have watched in horror as OPI has continued to destroy Montana's fine education system. Do not allow these changes to be implemented. Students need access to both qualified Librarians and are drastically in need of Counselors at all P-12 schools.

The assault on Montana students must end.

Respectfully,

Bill Callaghan- retired teacher

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It is so unfortunate that this is even being considered. We currently have CSCT Services and a full time counselor to service our 270 students. Those students would suffer greatly without all the services we currently have. They are already spread too thin with the number of kids that require or request to see them on a daily basis. This proposal is NOT in the best interest of our students, staff or our parents. The services that they receive at our school are oftentimes the only services they receive or can afford. A school is supposed to be a safe zone and without proper services for those in need of counseling, they may not have a safe zone at all if they are having trouble at home or anywhere outside of school. In the world we live in today, we need MORE COUNSELORS not less.

Please consider what you are doing and what the long term effects would be if this proposal is passed. It will be very detrimental for our students.

Respectfully,

**Brenda Sommerville**

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Tristen!

Good Morning!

My name is Brent Edgmond, and I am a 35 year veteran as a high school Instructor at Laurel High School. My first 20 years were as a Science Teacher, and my last 15 years have been as a School Counselor.

At Laurel High School - there have been two Counselors on staff for the past 35 years. The jobs we do, the time we put in, and the strain on us is unreal. To reduce the numbers of School Counselors in a school of our size would NOT be beneficial to our students, our staff, our school district or our community.

We schedule students, administer standardized testing, counsel, deal with students with mental and physical issues, and work with day-to-day student emergencies each and every day. You never know what issue is going to walk through your door from day to day. We are constantly on the run. From 7 AM to 5 PM....or later..... 6 or 7 days a week....every week of the school year - and during the summer. We go above and beyond so we can service our students. If we don't - our students would not be taken care of by anyone else in the school.

To reduce the numbers of school counselors would be a detriment to Montana Schools. Simply stated; we could not service our students if our number of School Counselors were to be cut. In schools of our size; it would be impossible.

If you would like to see in person - what we go through - on any given day; please let me know and we can show you what the day-in-the-life of a School Counselor is really like. We would love to have you come to Laurel.

If you have questions, please let me know.

Sincerely,

Brent Edgmond

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I am writing to urge the Rule Making Committee to maintain the staffing ratios for counselors and librarians in Montana schools. Our MT students need and deserve the services provided by these two specialist areas. They are the heart and soul of schools, meeting essential needs, academic and otherwise. Please reject any attempt to eliminate or reduce these essential services for our students.

Brent Scott

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The recommendations for the change in ratios for librarians and counselors and the lack of the arts in Middle School will hurt our students. Please keep them the way they are.

Brianne Logan

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Hi Tristen,

As a school psychologist who works closely with school counselors, I am appalled, frustrated, and concerned about the impact of this proposal on our schools. The clear importance of a school counselor to the school climate, school well-being, and social-emotional behavioral needs of students and staff is obvious when walking through any school door. Their unique role is *especially* critical as qualified mental health *school-based* professionals who also understand education, and are trained appropriately to address mental health, behavioral health, and *school* needs. This proposal will hurt students, and ultimately put more pressure on teachers to support social-emotional and behavioral needs, and inadvertently lead to greater retention among teachers.

I certainly have additional concerns that are not included here. Please reach out for further discussion.

However, ultimately, this proposed change is a terrible idea with lasting negative effects. Please consider removing this proposal and voting against this change.

Thank you,

**Brittany Lewno-Dumdie (LD), PhD, NCSP**

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To the Montana Board of Public Education Rule Making Committee:

The following comments are in regards to Supt. Arntzen's proposed recommendations.

I ask that you please maintain the librarian and counselor ratios. Eliminating the ratios will eliminate students' access to their very needed services. These proposed recommendations unfairly target rural Montana schools and students.

I also ask that you maintain & preserve specific electives and credit recommendations for middle schools. The superintendent's recommendations strike language that will eliminate students' access to music education, visual arts, career education and many other courses. Montana students want AND deserve a well-rounded education.

Thank you so much for your time,

Britten Postma

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Dear Tristen,

I am sending my comments to you regarding **several proposed changes to school accreditation standards as recommended by the Superintendent of Schools.**

1. **Basic Education Program Middle Grades**, 10.55.901: Superintendent Arntzen has made recommendation to eliminate specific programs and credit requirement in middle schools. This recommendation will prevent student access to critical topics and instruction. I ask that you **do not accept her recommendation** as our Montana Middle School students need to have a

broad education program to prepare them for successful high school achievement and life success.

2. **School Counseling Staff**, 10.55.710 Arntzen's recommendation to eliminate counselor/student ratio requirements is absolutely **unacceptable**. We constantly are hearing from across the state about the declining mental health of our students and this is not the time to eliminate requirements that provide support for life skills and counselling. Please **do not support Arntzen's recommendation to eliminate counselor/student ratio requirements**. I also noted that she has eliminated the word "licensed" and replaced it with "endorsed" school counselor. I am not sure how this small change effects our schools, but I believe the effect could be unlicensed school counselors or educators not adequately prepared. Licensed School Counselors are a critical component of insuring adequate training for school counselors. Please **do not accept the recommendation of Arntzen**.
3. **Library Media Services**, 10.55.709 Again Arntzen's recommends eliminating the ratio between students and library media specialists is not acceptable in Montana. Please **do not support Arntzen's recommendation** to eliminate the FTE ratio of librarians to students. A well trained and licensed Librarian is critical for the intellectual development of the K-12 students in Montana.

Respectfully submitted,  
Bruce W. MacGregor

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We need to maintain the librarian and counselor ratios

Bruce J Masiak

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Good morning,

My name is Bryant Mawyer, and I am a school counselor in Laurel, Montana. I have worked in mental health for over a decade, and there is more strain on our kids and families right now than there has ever been since I have entered the field. Our state also currently has the highest suicide rate for the nation, and every year is constantly either at the top, or near the top of states with the highest rates of suicide in the nation. What strikes me most about this proposal is it would seem to strip some of the most vulnerable children from perhaps their only access to mental health, especially in rural settings, which makes up a large and important part of our state. There are many legitimate reasons why families cannot get access to affordable mental health services; schools have certainly shouldered some of this burden with providing counseling services, school social workers, and CSCT programs. The mental and behavioral health services in schools have long served as a bulwark against many of the problems that plague our youth the most, and these problems aren't going anywhere. If we are to start chipping away of these supportive services our youth will suffer the most cost.

Taking all of this in to account, my question to Superintended Arntzen is: By what measure are you willing to sacrifice a guarantee that our public school children will have some type access to mental health services?

Thank you,

**Bryant Mawyer**

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These cuts will greatly impact students of all ages in a variety of school settings but even more so in our rural schools that would then be unable to have the ratios necessary to receive those services. The current school accreditation standards based on enrollment for Library and Counseling services best address the needs of students in our public schools. The ratios addressed in the current language allow for access to library services that students *absolutely need to be successful in school*. There is no logical reason to adjust those ratios to the detriment of students other than to further gut public education. When cutting services for school counseling, you are setting up our most vulnerable students for failure. When a student is unable to receive the services necessary to provide them support, guidance and direction in their personal lives with personal issues, they choose to drop out of school or worse, choose to drop out of life.

Students in rural areas are more prone to substance abuse and suicide and eliminating their network of supports through their schools furthers that danger.

Do the right thing. Please reject these proposed changes that unfairly target our students in rural settings. Do not gut public education any further!

Thank you for your time.

Sincerely,

Carleen L. Hathaway Veteran Para Educator

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It is with great concern that I am emailing you this evening. For the sake of all PUBLIC School students, but especially students in rural schools, please maintain the current ratios for school librarians and school counselors. Our students need the services and educational opportunities offered by school librarians and counselors. They have an incredible impact on academic achievement and student success. Please do not offer our students fewer services as they try to navigate the post COVID-19 pandemic.

Thank you for your consideration,  
Cherie Stordahl Great Falls, MT

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My name is Colleen Murphy and I am a school social worker.

The ratio for students to school counselors is ridiculous. The school counselor association recommends a ratio of roughly 140 students per one counselor. This would be barely enough if it were followed. The needs of our students for SEL and mental health are high and rising. I think that in addition to school counselors at the 140 to 1 ration, Montana schools need school social workers to address the needs of Tier II, and often Tier II, students. As the CSCT programs are in jeopardy I think that the money spent on for profit mental health centers who provide CSCT, could be better spent on Licensed Social Workers employed by the schools. I would love for the union to do the math. Many other states employ school social workers.

Thanks!

Colleen Murphy LCSW

I am writing to implore you to maintain the ratios for both school librarians and for school counselors. These rule changes are bad for Montana and specifically for rural Montana. Access to a library at school is the only access that some students in our state get to choose books and have conversations with caring people about books. Reducing access to library media specialists harms students by removing a trained professional voice that can help them navigate research and develop independent problem solving and thinking skills. Access to a school counselor for many reasons is also critical. Whether it is for help applying to colleges, to having a safe person to talk to through a crisis, we need as many school counselors as we can get. Reducing requirements could have devastating effects on some of our most vulnerable students across the state. Please reject Superintendent Arntzen's recommendations and uphold what is good for students in all corners of our state.

Thank you so much for your time,

Eric Matthews

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As a schoolteacher and a parent of young children, I am appalled at the changes Elsie Arntzen has suggested in her recent recommendations. Our school counselors are the first line of defense to prevent school shootings. Our school librarians help our kids discover for themselves what is "fake news" and what is a reliable source of information. Our music, art, and elective courses give students a healthy emotional outlet, a reason to stay in school, and the tools to become well-rounded young adults. These skills and the kids who learn them are the FUTURE of our state. Please SUPPORT them, don't cut them!

Jenny Painter

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I write to you tonight pleading that you maintain the ratios that are currently in place regarding school counselors and librarians. Now, more than ever, our youth needs access to books and mental health care. Students in ALL schools across our state deserve these rights. As a Montana public school teacher, I have witnessed the fierce need for experts in the field of literacy/literature and counseling. When our students' mental health is at an all time low, they need access to MORE expert adults, not fewer. I implore you to keep the ratios in tact.

Sincerely,

Jessica Lucas Lolo, Montana

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Good Morning. I am a school counselor and I wanted to let you know how important school counseling is. I see several students a day and on a regular basis. Our students have many things going on and need someone they can go to immediately when they need help. Most school counselors now have the same degree as a therapist; just don't have the clinical hours as they chose to serve students in the school. I have a full therapy degree and most of the required hours for testing, but the law changed and they will not accept face to face school counseling hours. Our students need full time school counselors for therapy, career choices, college applications, FAFSA, alcohol and drug education and counseling, and much more. I have intercepted several students that were planning suicide. We have sent several students to Billings Clinic this year from our local clinic that were referred to the local clinic by us. If a school counselor saves one life they are well worth having in the schools. I think removing them from the schools is a very bad choice. Our school contracts a therapist that is in the district three days a week. We have three schools and her time is very spread out. If anything, we need the number of students per counselor to go down so they get

more attention on a daily basis. Counselors have a very special connection with students and they are the one that the student is more apt to confide in, not an outside counselor. Many students don't have access to therapy other than the school and I feel we would be taking a huge service from our communities that makes a difference for many. If anything we need more school counselors!

Jewel Davenport Colstrip High School Counselor

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I am writing to ask that you please consider maintaining the current librarian and counselor ratios in schools. To do away with those is a disservice to our children, our grandchildren, all youth in schools. Please please consider keeping and maintaining the current ratios.

Jody Furrer

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I am writing in response to the proposed changes to counseling and library ratios.

As a current teacher in the k-12 school system, this change would be extremely devastating. Our Montana students deserve all the mental health support they can get. And they also deserve to have access to a wealth of knowledge through a library. Please keep the current ratios for Library and Counseling going forward. It is best for kids!

Thanks, Josie Breault

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Superintendent Arntzen's recommendations regarding school librarians and counselors are ridiculous. I urge you to ignore her outlandish suggestions and maintain the accreditation standards as they exist.

Sincerely,

Judy Byrne, retired educator Great Falls

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This is to the Montana Accreditation Board in regards to the changes that Ms. Arntzen has proposed to the accreditation standards for Montana public schools.

I am a retired elementary educator having spent 36 years in the trenches of our Montana schools. I can state without a shadow of a doubt that our children- now more than ever- need access to full time counselors and librarians. They need access to music and art education. How can we cut services for counseling especially as we face this crisis in our country? If anything, we need MORE counselors in our schools, more access to fully staffed libraries, and more music and art educators. Please do not vote to cut back on these vital programs that help our Montana children maintain good mental health. They are our future and we need them healthy physically, mentally, and spiritually.

Sincerely,

Judy Ireland Retired and proud Montana teacher

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I hope this email finds you well, and you will help share the word that the educators in the state of Montana feel both Librarians and Counselors are extremely important in helping provide a quality education to the children of our communities.

These staff members oftentimes help provide support to both students and teachers in a way that no other can. They are vital to our public education system, and I hope those who are helping make these decisions will remember that when choosing how to *help* our communities and state. Please let me know if there is anything else I could do to help the cause.

Respectfully,

Kaitrin J. Salanky

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After reading through the changes that Superintendent Elsie Arntzen is recommending for Montana schools, I find myself in opposition to some of her proposals. I work as an educator at a public elementary school, and I have seen first hand just how vital our school librarians and counselors are to the success of our students. I could not support my class without the work of either of those people, and so I stand in opposition of Superintendent Arntzen's recommendation to remove the ratios in the school library media services (10.55.709) and school counseling staff (10.55.710). Montana students need and deserve access to libraries and librarians, and to counselors - today more than ever. Not to mention that both of these recommendations unfairly target rural schools, which have been and continue to be vital links in educating our Montana youth. On behalf of classroom teachers, I urge you to consider retaining the current student ratios for both school library media services and counseling staff.

Thank you.

Sincerely,

Kara Basko

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I am reaching out regarding OPI's proposed changes to Chapter 55. First, I would like to request a link to tomorrow's zoom meeting. Second, I would like to express extreme concern over the proposed changes regarding librarian: student ratios and counselor: student ratios. These recommendations basically assert that school districts do not even need to meet a minimum librarian:student ratio OR a minimum counselor: student ratio. Our students will pay an educational, social, and emotional price in the long run if these recommendations pass. The best educational data shows that when schools have full-time certified school librarians and support staff, students have improved college and career readiness, higher achievement, better reading skills, and facilitate the development of 21st century digital literacy skills. Similarly, research is showing that social and emotional learning is a key part of positive student outcomes in education. Effective counselors and counseling services help students have a greater sense of happiness, safety, and security at their schools and results in higher academic performance of all students. Further, strong counseling support has been shown to have a direct link to postsecondary success. In the aftermath of the pandemic, our students are in a social and emotional state of chaos and need MORE support, not less. If we want our students to be prepared for life after graduation and be contributing citizens of the great state of Montana, ensuring all of our schools have full time, certified librarians and school counselors at the appropriate ratio as part of each district team.

Please do not support elimination of minimum librarian: student ratios or minimum counselor: student ratios from Chapter 55. The students of Montana will pay a high educational, social, and emotional price in the long run if these recommendations pass.

Kind Regards,

Dr. Kate L. Eisele

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As a Montana educator, I stand against Supt. Arntzen's recommendation to eliminate the staffing ratio for school counselors. Ratios ensure that counselors don't have more students than they can handle in order to provide the quality of support our Montana students deserve. We are already seeing many professionals leaving the K-12 sector. We can't afford to overwork who remains and expect them to stay. Our students and our staff deserve our support. Thank you, Katie James, M.Ed., TODHH

PLEASE maintain ratios. PLEASE prioritize our kiddos, they need access to these services more than ever. May I please have a link to the Wednesday meeting?

Thank you,

Kelly Connolly

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I am very dismayed by Elsie Arntzen's recommendation to eliminate the ratio for school librarians and school counselors. At a time when mental health needs are paramount, eliminating ratios that ensure students have access to counseling staff and literacy resources is unconscionable. In what way does this possibly support students and families across our state? We should be endeavoring to promote best practices in our public schools - not eliminating standards that are already in place. I urge the Negotiated Rule Making Committee and Board of Public Education to maintain these accreditation standards and ratios as they are currently written.

Thank you for your consideration.

Kim Story, Ed.S. (she/her) School Psychologist

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Please do not allow the changes of ratios for library media and school counselors occur. This would be detrimental in keeping librarians and counselors from our students. We should want the best for our youth. Keeping quality educators such as librarians and counselors from our students will keep them achieving their full potential. Please vote no to these changes.

Sincerely,

Kodi Hoffmann English educator

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With the state of mental health of our students, how does this help them? Students utilize both places multiple times each day and are essential. We have already lost our mental health services such as AltaCare. We can't afford anymore loses that affect students and their mental health.

Thanks,

Kris Kelly

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Please maintain the library and counseling ratios for our Montana students. Both services are vital for all Montana students!!

Thank you,  
Kristi Crawford

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I ask that you maintain current librarian and counselor ratios in our schools.

Library teachers are key in literacy gains in school, providing a valuable service at teaching information and technology skills. The collections that librarians curate connect students with literature and research materials — vital tools for school. [https://www.ala.org/aasl/sites/ala.org.aasl/files/content/aaslissues/advocacy/AASL\\_infographic.pdf \[ala.org\]](https://www.ala.org/aasl/sites/ala.org.aasl/files/content/aaslissues/advocacy/AASL_infographic.pdf) Thank you for considering the importance of library teachers in our schools.

Best regards,

Kristin Hopkins Bozeman

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I have been a teacher for 27 years, and due to a variety of factors in our world currently I have seen more need for student access to counselors. There is more demand than counselors can meet, which leaves many vulnerable students at greater risk. With the the rise in suicide rates among children it would be a severe neglect on the part of OPI to encourage cutting these much needed positions. The same could be said for librarians, whom students often look towards in making valuable connections in their schools. Please do NOT eliminate the funding or requirements for these positions-or risk putting students in danger.

Thank you,

Kristine Kelly-Coburn Montana educator

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Please maintain the current librarian and counselor ratios.

Thank You!

LaRae McGee Paraeducator

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I write in opposition to Superintendent of Public Instruction Elsie Arntzen's recommendations to eliminate the ratios used in 10.55.709 and 10.55.710. The staffing ratios used in both the School Library Media Services and the School Counseling Staff standards in Chapter 55 are precisely what we need in order to guarantee that students receive the services they need and deserve. Ms. Arntzen's recommendations are poorly-conceived, and will unfairly target rural students in Montana. I happen to serve on the board of the Montana Small Schools Alliance (MSSA). Thus, I am familiar with the excellent work of the MSSA, and the fact that small rural schools can be supported in very meaningful and productive ways in meeting the library and counseling standards. There is no

compelling reason to amend those standards in the way that Ms. Arntzen proposes, and there is every good reason to maintain the ratios contained within the standards. Every one of Montana's students deserves library and counseling services.

Respectfully yours, Laura Straus

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As a public school teacher, my middle school students needs for school counselors have never been greater. Please maintain the student to counselor ratio required for school accreditation. At times, some of my students lives have depended on access to quality school counseling. In a state with one of the highest suicide rates in the country. removing this support from schools will cost kids lives. The requirements for a certified librarian must be maintained as well. Our very democracy depends on it as we need an educated populace to maintain democracy and curating and maintaining quality libraries in schools is a vital part of maintaining an educated population. Other school staff are simply not equipped or trained to meet the requirements of supporting a quality school library. The traditional role of school librarian also doesn't only encompass books, they also serve as media specialists and have been a huge asset in helping schools and students implement technology in meaningful ways for student learning.

Thank you for communicating my concerns,

Leslie Dalbey Polson, Montana

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I am writing to support maintaining the librarian and counselor ratios. Every student needs access to school librarians and counselors. Eliminating these ratios unfairly targets rural areas. Our children need and deserve these services. Eliminating these ratios will be disastrous.

Thank you,

Linda Swanson

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As a middle school band teacher, I fervently oppose the changes to middle school elective and credit requirement language. Please relay my position on this to the committee, as I know it is reflective of many of my colleagues' opinions as well.

Lisa Sundquist Band Director, EMS

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I am writing to comment on proposed changes to School Library Media Services and School Counseling Staff. I understand that the plans outline reducing the current recommendations for school librarians and counselors. As a former administrator and librarian in both public and private schools, I do not understand this move. Students are in need of a place to go to relax, read and explore the shelves of a great library and many have the need to find counsel with a school counselor. Staff and students need a place to go when there is reflection on scheduling, death in a family, suicide, or an accident. Books and direction to finding good material is essential in providing top notch library services. I have been in a district that hired a staff member to be in the library. How hard can it be to check out books? In those two years that staffer decided to rearrange the library without the structure of library classification under Dewey decimal. Such classification helps order the library resources in

a structure that facilitates patron use. A library demands much more than checking out materials. Lesson plans, weeding, purchasing and facilitating access to a variety of information and evaluation of material, along with technology expertise are part of the requirements of a librarian daily activities. A librarian helps introduce students to literature and other resources that broaden their point of view. A well implemented program helps prepare students to be effective users of both ideas and information. Many students find the library a safe place. The school library allows learners to explore their own personal questions and consider academic relevance. A librarian is needed to guide activities, direct access to information, and provide the exchange in deep thinking and discussions. A certified librarian ensures the students the best chance for success. In today's world I want students to be curious, ask questions and seek answers, and gain knowledge on ideas important to them and their families. Reading is the core of personal and academic competency. The library is not a choice for cuts at a time when we want learners to be prepared for college, career and life. Librarians not only teach students how to learn, but they are in partnership with teachers to help provide, or help them find materials to meet the curriculum needs that drive student success. Please do not cut the current ratio and eliminate student's access to school librarians.

Counselors are in high demand with the current limited numbers of certified available. Many feel stressed with the needs of students from supporting academic needs and planning to advocating the needs of individual students. The counselor helps facilitate planning, both for student and scheduling needs, as well as providing direction in counseling programs. According to the 2019 report in the National Vital Statistics Report, Montana has the 3rd highest rate of suicide in the nation and depression rates higher than ever. Flathead county suffered deaths by suicide this school year, so with Montana facing a crisis among youth, so why cut counseling requirements? I would love to double it so that one counselor can focus on academics and one can focus on student needs. School counselors bring insight and resources to both students and staff. Academic development, social and emotional development, therefore the amount of time school counselors devote to these areas to serve students and coordinate with others should not be limited by increased student numbers. It should be facilitated by encouraging more counseling within the building. Please review the need for counselors and reconsider the elimination of Montana's students' access to school counselors. Librarians and counselors are so very important in the school. Making cuts to access to either is misguided. This timing is most unfortunate coming at a time of issues from the CoVid-19 pandemic triggering an increase in anxiety and depression. Please review this with the understanding of the great importance of both the school librarian and counselor. I am adamantly against this proposal.

Arntzens suggested ratio changes would unfairly affect all students, especially rural students. This idea is simply not realistic and completely unfair. Our goal is to help students, not put another roadblock up for them to hurdle.

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Please maintain the librarian and counselor ratios. Our kids have lost so much in the last few years. Please don't take this from them too. This is going to unfairly affect rural students. Students need counselors to talk to and glean help from about future schooling, grants, loans, family issues, student issues. Please don't leave these students with no one to turn to. Librarians help the students find information for reports, interests, and ways to escape into literature. The absence of these two positions puts more unneeded duties on our teaching staff. Our teachers have been saddled with so much more than teaching that the actual teaching has had to step aside some. Our students need

all the help they can get in the world we are living in. Please don't decide to pull these resources from them.

Lynette Huvaere South School Secretary

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I have to admit this isn't the first time I've wondered what Superintendent Arntzen must be thinking. Almost every single day there is a story about the precarious state of our children's mental health. Families are under increasing pressure, due to the pandemic, economic pressure, lack of access to affordable mental health care and the drug epidemic. This is not the time to reduce counseling staff. It defies reason to reduce counseling services at a time of such need. I would be interested to know the rationale for Superintendent Arntzen's recommendation. Her abandonment of the most vulnerable students is shameful and totally without merit. Clearly those in rural areas, where access to mental health care is extremely limited, will be the most affected. I urge you not to adopt the Superintendent's recommendations.

Sincerely, Lynn Allison

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Please vote to maintain current ratios for school counselors and librarians in Montana schools. Students need libraries and students desperately need counseling services at schools.

Maggie Guttormson

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I hope this email finds you well. I have recently learned of the Superintendent Arntzen's intentions to essentially do away with librarians and counselors. As someone who is related to both a school counselor and a librarian, I see the irreplaceable work they do for students and the school at large. I have seen at length the work school counselors do, and schools seriously cannot run without them. Furthermore, as someone in college studying to be an educator, the thought of schools with no counselors or librarians is frankly frightening. Social emotional learning and literature compliment math and science and are equally as valuable to childhood development. I urge to keep these important positions in all schools, as they are much needed.

Concerned Citizen

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As a retired teacher, I am employing you to vote to MAINTAIN the ratios of School Librarians and School Counselors. Students need access to both Librarians and Counselors. Vote against any recommendations that reduce student access to these important elements at school. Please pass along this request. Thank you, Margie Willhite

Having access to a school counselor is vital to student success. As a retired teacher in a Title school I am grateful for the assistance I received from our counselor who worked diligently to keep students regulated and in the classroom. Further, these students had access to a full time librarian who enriched their lives with books that they would not have access to in their homes as well as taught them skills in research and internet use to enhance their school success.

Please don't gut these two areas of learning.

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Please maintain the current ratios for librarians and counselors in public schools. We need them both!

Marisa Crerar

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I am contacting you to let you know I am adamantly against Superintendent Arntzen's recommendation to eliminate ratios of students to counselors and to librarians. The ratios are important to protect student access to help, improve quality of life for them, and help them turn into well-functioning adults. Superintendent Arntzen's proposal is anti-student. Please do not support her latest proposal.

Sincerely, Mary McHugh

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I am deeply concerned about the proposed changes on the docket that may eliminate or substantially reduce the number of staff librarians and counselors. Students and staff rely on librarians and counselors for far more than their specific job duties and they are integral members of the school community. Librarians assist teachers with technology and research daily by helping students and staff have access to quality materials, texts, audiobooks, etc. as well as provide assistance to students on multiple levels. They are an important part of curriculum when we talk to students about media literacy and critical thinking, as well as how to navigate the perils of online information. Now, more than ever before counselors fulfill an incredibly important role in helping students learn to not only manage their emotions but integrate back into everyday school; something students are definitely struggling with after two years of disruption. Students are suffering from crippling apathy, anxiety and lack of focus and counselors are the bridge between home and teachers to help students get back on their feet so they can graduate and feel confident in themselves. If we lose counselors we will lose students, period.

Please consider voting no, and continue to keep qualified and essential staff in our school. Thank you.

Meleina Helmer

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I am strongly opposed to Else Arntzen's proposal to eliminate the ratio for determining a school's requirement for school counselors and librarians. Both these positions are very important for the well-being of our youth. The librarian at my granddaughter's school ran a writing club and has been key to my granddaughter's growing self-esteem as an avid reader and writer. We need more school counselors, not less. Very often school counselors are the only mental health person any child will have a chance to interact with. Mental health is a growing concern. Our children deserve better. They deserve more counselors, not a way for schools to hire less or none at all!! strongly advocate to keep the current ratio for librarians and school counselors!!!

Sincerely,

Melinda W. Obert

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I am writing to vocalize strong opposition to Arntzen's recommendations to change school libraries and counselors. These proposals work out if you are an upper-middle class Montanan and

have access to such services outside of the school. Yet, more and more Montanans are falling behind the upper-middle class status. We are seeing more and more Montanans in the lower-middle class to poverty status. With that brings trauma and lack of access to resources (including safe transportation to/from public libraries for young children). School libraries are essential to a thriving free and public education. Mental health services are critical for our students who are coming with more and more stresses, demands, and mental instabilities as families struggle to survive in Montana.

I strongly encourage you to do what is right for our youngest, most vulnerable citizens. Our state is only as strong as the education and opportunities we offer our children.

Melissa Lynn she/her Kindergarten Lowell Elementary

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Our students are experiencing changes to society and homelife like never before. We need more counseling opportunities for students, not less. Keep the counseling recommendations the same, or increase them. One person for 400 students is hardly a service to students. Even at .5 hours a week per student, that's only 80 students seen per week with no breaks. It would take over a month to meet with every student. How is this beneficial to students? Please keep the recommendations the same or lower the ratio.

Thank you, Michelle Petersen FBMS counselor

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Thank you for your work in Montana's public education accreditation. I'm a 5<sup>th</sup> grade public school teacher in Bozeman. I just learned of a proposed rule change regarding accreditation of schools that will go before a vote to Montana's Board of Public Education. The change would eliminate the required ratio of students to librarians and counselors. This is a terrible idea. At my school I am watching both our librarian and counselors overloaded with job demands and kids in need, particularly emotional needs. I am astounded that such a change would even be proposed at this time considering the mental health struggles of today's youth. In truth, we need lower counselor to student ratios right now! The library is often used as a refuge for kids who just can't handle the pressures they are experiencing. Opening up more spaces like libraries and supporting students to deal with their big, strong feelings in non-destructive ways are critical practices to boost overall student well-being right now. Please do not eliminate these ratios. The kids will suffer—even more than they are now. I suggest the members of this committee speak to librarians, counselors and administrators throughout Montana's public schools to better understand the demands on the staff at this point in time. Then you could make a more informed decision on this proposed rule change. Thank you very much for reading my concerns.

Aloha, Missey Dore

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I am a middle school counselor writing to voice my strong opposition to Superintendent Arntzen's recommendations to reduce counseling FTE ratios. This misguided and short sighted recommendation comes at a time when students' and families' mental health needs are heightened. Working in a middle school, I work for *all* students and their academic, career, and emotional and social success. That task is overwhelming with the increased need for support in the post-pandemic era. We spend much of our time in reactionary responses because students'

emotional needs are so high and we don't have the time or resources to be proactive in our efforts. We are using school counseling interns to help us address student needs because we need the extra bodies in the building to help us support kids. Reducing or removing the school counseling ratios also puts students in rural areas at a further disadvantage because school counselors can often be the only mental health resource available in rural areas. If anything, we need *more* school counseling FTE to respond to the increased mental health needs of our students and a reduction would be detrimental to their academic, career, and social and emotional success.

Thank you, Molly Tingley Middle School Counselor

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Please don't change the Montana Public School's current ratios for school library media services. It is so important to have a school librarian's support to achieve a high standard of literacy in our students. As a public school teacher librarian, I know firsthand how public school libraries and their librarians support students' literacy development. You probably do too, since 9 out every 10 American students attend public schools. One part of our work develops students who know how to use information ethically, how to evaluate the reliability of information before passing it along, how to capture information, and then, present findings. The other part of our work supports our students reading. Our district has invested in a collection tailored to our students. School librarians know and value our library collections, and promote it with students and teachers. That is why we have over 18,000 checkouts in a school year. The teacher librarian has a certain skillset that insures the school library collection is used and maintained. Beyond that, our library is a refuge for many students. It is a calm oasis in our large middle school. It is a place our students relax into a book. We serve as a safe place for students before, at lunch, and after school. When I was in elementary school in Bozeman, it was the 1960s. I remember my mother, and others working throughout the day to put together a makeshift library in the Emerson School. In those days elementary schools were without libraries. Someone along the way, looked at the data and decided to invest in boosting Montanans literacy years ago. Please don't hollow out this important underpinning to students' literacy that is already established. Please be forward thinking. As a republic, we require a literate population.

Thank you. Nancy Loeza

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Montana is a mostly rural state. Cutting the number of librarians and counselors puts small town kids at a disadvantage. Please reconsider these changes.

Nancy Robinson Laurel High School

English

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I write to you today in an effort to encourage you to maintain the librarian and counselor ratios in Montana schools. These programs are vital to the academic and mental wellbeing of our state's students and ultimately the future of Montana. Urge you to consider the impact a negative change will have on the population it will affect. Thank you for your time.

*Natalie Noble Kindergarten South Elementary Laurel Public Schools*

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At Wednesday's meeting I urge you to maintain current staffing ratios for School Counseling and the School Library. School Counselors are more important now than ever before. Student mental health is at an all time low. Students need support to find success. Both of the proposed changes will directly impact student learning and unfairly target rural schools.

Thank you, Nicole Whitescarver

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I'm writing to voice my concern about Superintendent Arntzen's recent recommendations to eliminate staffing ratios based on enrollment for school library media services and counseling staff. I find her recommendations unconscionable and wonder if she has any idea of the effect this would have on our Montana public school students, or if this even concerns her. As a retired elementary teacher who taught for 36 years and presently volunteers in Missoula public schools. I am appalled that our students and staff have not the advocate they need or deserve in a position to make a difference for them.

Please consider the impact the rule changes would have on the children's ability to access and benefit from the crucial assistance and educational guidance they receive from librarians and counselors.

Sincerely, Patricia K Doyle

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I find Supt.Arntzen's recommendations to limit students' access to library services as well as counseling services appalling and truly one of the most egregious actions for a person who is supposed to be looking after the welfare of the students of Montana. With the stress levels from living in a pandemic, to loss of instructional time, to trials in their lives such as evictions, loss of family income, now is the time students most need access to counseling. They need the safety of a library where they're allowed to check out materials, books, computers in order to make their lives easier. I certainly hope that the Negotiated Rule Making Committee will see this is as pure folly and will refuse her recommendations.

Sincerely, Patricia A. Rosenleaf retired educator

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Please do not eliminate the current ratio for Librarians and Counselors in Montana schools. Doing so will only penalize our students and unfairly targets rural students. The children of Montana deserve better!

Thank you, Rhonda Krause

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I have to admit this isn't the first time I've wondered what Superintendent Arntzen must be thinking. Almost every single day there is a story about the precarious state of our children's mental health. Families are under increasing pressure, due to the pandemic, economic pressure, lack of access to affordable mental health care and the drug epidemic. This is not the time to reduce counseling staff. It defies reason to reduce counseling services at a time of such need. I would be interested to know the rationale for Superintendent Arntzen's recommendation. Her abandonment of the most vulnerable students is shameful and totally without merit. Clearly those in rural areas, where access to mental

health care is extremely limited, will be the most affected. I urge you not to adopt the Superintendent's recommendations. Sincerely, Lynn Allison

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Good morning. I am writing this letter as an appeal to the committee to consider leaving the current Librarian and Counselor ratios in place. I believe it would be a disservice to student and an unfair decision if the ratios were eliminated, especially in rural areas where these services are often more needed than less. Thank you for your consideration.

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I oppose Superintendent Arntzen's proposed gutting of accreditation rules for Montana's school libraries. I am a school employee in Montana and I value student access to libraries and the current standards. This attempt to change our library system is wrong for our students!

Thank you, Robin Vogler

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I am a certified school staff member at Target Range School in Missoula, MT. We are an independent district with 550 students, down from 610 a few years ago. This reduction in students has greatly impacted our ANB funding. Our school is currently proposing to cut our middle school counselor down from 2.0 FTE to 1.5 FTE because it meets the current accreditation criteria. Our middle school counselor is also certified in ELA and spoke at tonight's general board meeting about the reason she is stepping down from her counseling position, currently for grades 5-8: she can not meet the needs of our student population. She does not have time. She tries to refer out to local counselors and agencies, but there are long waiting lists and students can not get the help they need. There is a lot of data out there right now about the significant emotional impact that COVID has had on students, and those of working in the field see it EVERY DAY. Teachers have to work harder than ever to teach because kids can't regulate their emotions. Can't. Not won't. Good mental health is not a choice. It is a blessing. One that many, even our youngest students, don't have. Please reconsider this change you are proposing for the sake of students, and teachers who love them. We need MORE counselors, not fewer. Respectfully, Shelby Midboe, M.S. CCC-SLP

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Please maintain the current librarian and counselor ratios for K-12 schools. Please do NOT vote for the changes that Superintendent Arntzen is recommending. Montana students need access to libraries and librarians for a complete education. Montana students also need access to counselors, especially with the impact of COVID-19. Please vote in favor of our Montana children and continue to maintain the current librarian and counselor ratios. Thank you for your time and hard work. Sincerely, Shirley Azzopardi

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If the current OPI Director cared about the financial and mental health of all Montana kids and their families, she would not recommend limiting access to school counselors. What the heck is her logic and when was the last time she spent an entire day in a public school talking to kids? Why is she not presenting a plan to serve our Montana kids and only taking services away from them?? She will increase costs to the state of Montana as kids will not have a planning advocate to help them go to college so instead they will not have jobs and need food stamps, Medicaid and housing vouchers. The kids will also have less mental health help and will turn to drugs, alcohol and suicide and strain

our already burdened State Hospital and local emergency rooms. We actually need more school counselors, right now, so please strike this language, and ADD more school counselors, social workers and CSCT.

Stacey Hargesheimer

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Please vote to retain the librarian and counselor ratios. I work in a class C school grades Ek-12. Those two services are heavily used by our students and staff. If the ratios are removed I can see the possibility of services being cut for budgetary reasons. Students then suffer the consequences. Thank you for your service to Montana schools and your vigilance in striving to keep them high quality places of learning.

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I'm writing in objection to the proposed changes to the following sections in the school funding code: 10.55.710 School Counselors and School Library Media Services, 10.55.709 No changes to the current ratios should be made as it puts rural schools - of which our great state has MANY- at a sharp disadvantage. Let's let rational minds prevail in this session.

Kind regards, Susie Beardsley Bozeman

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Please maintain the current librarian and counselor ratios. Superintendent Arntzens proposals would unfairly harm rural schools. As a teacher in a small rural school I'm begging you to keep the current ratios. Your rural schools are dying and we need protection.

Tammy Dalling 6th grade Teacher Gardiner Public Schools

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I have grave concerns with several of the proposals being considered at your meeting today.

I oppose eliminating the elective program and credit requirements in middle school. Students need access to arts, music and career education. As you know, students make the decision to drop out long before they are of the age where they can drop out under the law. These programs often provide the incentive and spark that encourages students to continue their education and graduate from high school. Schools must be so much more than reading and writing and arithmetic in order to reach our children of all abilities and interests. I am also troubled by the recommendation that librarian and counselor ratios be eliminated. Librarians are critical to our children and schools. Counselors not only keep kids in school, they literally save lives. Montana must make our children our priority. These recommendations would do just the opposite. Please vote against them. Thank you for your consideration.

Sincerely, Terry Minow

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I was informed by a public school librarian about a multitude of changes the Montana Office of Public Instruction is considering. I want to share my support of public school libraries, as they are a vital component of every students' education. By the look of the draft copy, there is a high possibility that public school libraries would be hugely limited or even eliminated. I believe losing public school

libraries would be a tragedy and should be reconsidered. As a teacher at a Title 1 school, as well as having taught in rural Montana, for many students the school library is the only time they get to a library. Libraries open minds to unlimited knowledge and save lives by providing a place to learn and be free to explore personal interests. I remember countless times 'hiding out' in the library as an elementary student. It was where I knew I was safe and found wonderful stories to escape into; as well as lots of information about the subjects I personally wanted to learn more about. Public school librarians are a critical part of what makes school libraries successful. They provide countless lessons for students to learn about research, books, diversity, and life. They also provide another layer of safe adults that students can turn to when/if in need. Please keep Montana's public school libraries fully funded so they can continue to provide the invaluable services that they do for our students. Thank you for your time.

Sincerely, Tony Napoletano Montana Resident and Teacher

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I am writing to urge a very strong recommendation AGAINST Superintendent Arntzen's recommendations that the language that supports students' access to school counselors and school librarians be taken out of the accreditation standards. We need stronger ratios, not none, in the language. It is clear that the current Superintendent does not support strong public schools with recommendations such as these. I have seen, firsthand, a dramatic increase in the need for mental health care in school and wish to see more qualified, empathetic, hardworking educators in our schools and communities. The ratio of educators to students is one way to help that increase happen. On a personal note, I feel it is an interesting coincidence that we share the same last name. That is my married name and am fond of and interested in my husband's family. Thank you, Tristen, for carrying the message of educators for the benefit of our public school children.

Respectfully, Twila Loveridge

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Dear Tristen,

Please convey my concern about the proposed changes to the ratio of School Media Services and School Counselors. Now more than ever, all Montana students deserve the opportunity to have access to a well-trained school librarian and counselor.

I am against these changes, which would disproportionately harm rural students.

Lisa Moore

Reading Specialist

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Negotiating Committee Rules Making Members,

Please reconsider not revising counselors, librarians and music educators out of education. These people provide an outlet for so many students today. As a parent, I cannot imagine my kids going through school without a librarian, counselor, art or music teacher. These individuals have helped shape my children into who they are today. Cutting programs and educators is NOT the answer. Thank you for your consideration.

Negotiating Rules Committee members,

As an educator for the past 28 years, there have been many things that have changed in education in the State of Montana. This proposal to reduce the number of counselors is absolutely ludicrous to imagine. Have you been "in the trenches"? There are more kids than ever who need some kind of counseling now more than ever. The beginning of my career saw very few kids who needed anything beside career counseling. Today the number has averaged about one every two weeks for referrals to see a counselor. While these numbers are based on observation only, it is still significant.

To top this all off, there is discussion to also cut back or eliminate library, music and art? For some of our students, that is what keeps them coming back day after day. For some, it has turned into a life's work for them. If we cut these programs, those students will slip through the cracks and never again be seen in public education again. It seems like we should be trying to get more students in the doors rather than driving them away from public education. Isn't a FREE and PUBLIC education guaranteed by the constitution? Last time I checked we live in a democracy where the majority rules, NOT the minority.

Please reconsider the direction your committee is taking. This could cause irreparable damage to our future by jading entire generations of students away from the public schools.

Sincerely,

Lynn Mason

Teacher

Corvallis High School

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Dear Dr. Loveridge:

I'm writing to weigh in in the strongest possible terms.

I ask that you share my sentiments with the Negotiated Rule Making Committee.

Please maintain the librarian and counselor ratios.

Also, please maintain and preserve the specific electives and credit requirements for middle schools.

All such changes under consideration will only diminish educational quality and opportunities available to public school children. This will clearly be the opposite of progress. Quality public education is part of Montana's Constitution. Therefore, moving in the direction of the proposed changes is really moving toward denying Montanans some of their constitutional rights. I urge you, the Committee, and Ms. Arntzen not to go down that path.

Respectfully,

Mark Kayll

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Please keep established guidelines for librarians and counselors in our public schools. We have thousands of at risk students in this state who need their services. Libraries are often the only safe place a student has to go to, and the counselors have saved countless lives. Both groups play critical roles in their schools and our children need them.

Therese Michalson

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Dear Tristen,

I am writing to you today to express how important it is for K-8 students to have access to both Library and Counseling staff. Due to the current environment, these resources are more important than ever for students.

Thinking especially of Counseling services and how children in 2022 are needing this service more than ever whether it's for their own mental health or a safe space.

As for the Library, the basis of schools and education is to provide children with resources and skills so they can learn within a classroom but also on their own. A Librarian provides that support outside of their classroom so they can explore and have some independence outside their homeroom.

The proposed changes will effect all students and families. And while our state grows at an unprecedented rate, and where there are already existing challenges, these resources need to be protected so we can continue to support our students and community -- no matter what size of the school.

Thank you.

Valerie S. Long

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Below is my comment in response to Elsie Arntzen's recommendation against school counselor ratios:

Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 410 students. In my 13 year career as an Elementary School Counselor, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Additionally, our younger students are coming in less prepared than ever to participate in the learning environment resulting in dysregulated classrooms that require a great deal of behavioral support. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. The American Counselor Association, American Psychological Association, National Association of School

Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. In times of great need, the response should be to shore up and protect services that meet student's basic needs so that they can cope and overcome their challenges, becoming productive and competent adults that will work for the future of our state.

Sincerely,

Robyn Edington, MEd, NCC, P-LCPC

Hawthorne Elementary

Missoula, MT

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It is imperative that functional counselor and librarian ratios for Montana schools be retained - not cut!!!

Thank you,

Sharon Simpson

Ronan, Montana

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Hi Tristen,

I'm writing on behalf of continuing elementary libraries in Montana. First, a little background information, in my first five years of my teaching career, I taught in Wyoming and California. In Wyoming, we had all the bells and whistles (huge classroom budgets, art education, new computers on teacher desks, library, music and PE).

Everything changed when I moved to San Diego where property taxes were frozen and San Diego Unified was suffering because of that. We had no library, no PE, no music, no paraprofessionals, and no money for any supplies. I wasn't even allowed to ask the families to bring in supplies at the beginning of the year, so I paid for all of that too. I began to hunt garage sales every weekend to purchase enough books to have my own classroom library. My little library in my classroom wasn't organized well and it had hardly any nonfiction resources. Of course, I didn't have the time nor the knowledge to teach library skills to my students.

Moving back to Montana, I've been so grateful to our school librarian who has not only taught my students library skills and helped with research projects but has also supported me with different instructional units. I cannot imagine going back to what I experienced in California.

We need elementary librarians in every school. Period.

Most sincerely,

Amy Casne-Fetz

Lower Montessori Teacher

Central Elementary

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Hello Tristen,

Please, see my attached letter. I have been a school counselor in the State of Montana for over 15 years and have significant concerns about changing the student to counselor ratio for the state. We must follow the data and research around the effectiveness of serving our students mental health and how implementing mental health interventions impact academic and social emotional learning in a positive way.

A'ine Franczyk, M.A.

School Counselor- Class of 2024

Big Sky High School

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Hello,

My name is McKenzie Carney and I am a Life Skills teacher in Bozeman. This was my first year in Bozeman and I have been so impressed with all the district has to offer.

First, I was incredibly impressed by having two full time librarians at our school. These two women have provided my students with disabilities countless opportunities to engage in literacy, and the overall library experience. It is incredibly sad to hear we may not have the opportunity in the future. I simply do not understand why we are taking librarians out of schools. For my students, the library provides a new space where they are welcomed and have so many opportunities for new experiences. Our librarians make their library welcoming for all students as they bring new and unique literature into the school. It would be very foolish to take this resource away from not only my students, but all of Montana's students. Librarians are needed in Montana!

Also, counselors are not just needed, they are required. COVID has created such a mental health crisis in our world, making counselors essential. At middle school, the mental health issue is very apparent. It is so hard to watch kids at such a young age go through so much. My last school I was at had no counselors and our students had no support for their mental health. If someone is struggling with their mental health, they cannot learn. Teachers and other school staff are not counselors and do not have the training to know how to handle some of the situations that arise at school. Counselors are needed in Montana!

With taking away librarians and counselors, you are simply failing our students and schools. It is embarrassing for OPI to even believe these changes are appropriate and adequate. To ensure the safety and continuing growth of Montana, these individuals need to stay in schools.

Thank you,

McKenzie

Hello,

I would like to make public my comment AGAINST Supt. Arntzen's proposed ratio changes regarding school librarians (10.55.709) and school counselors (10.55.710). I am appalled that, during a time of record-high emotional and mental concerns for our children, anyone would want to cut our support for their emotional and mental health. Please do not further harm our kids with this. Removing mental health support and educational support damages our children's K-12 experience, limits their education, and puts our teachers under even more strain. If anything, change the ratio so our schools have MORE counselors and librarians!

Our public school teachers and administrators just navigated the Covid-19 pandemic and are still working hard to get all students back on track. This move would be a major blow to everyone in our state.

Sincerely,

Anna Tuttle

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Good afternoon Tristen,

I am contacting you in regards to the proposed changes that Mrs. Arntzen wants to make to the Montana school accreditation standards.

As I am sure you know, the United States and Montana are in the middle of a mental health crisis that is also affecting Montana's youth. To restrict students' access to a school counselor is unconscionable. Teachers, principals, students, and families rely on school counselors immensely. Their work is invaluable to our school community and students would suffer greatly if they did not have access to them full time.

Additionally, school Librarians are one of the most important school staff members. In a digital world, the digital citizenship they teach to our students is of the utmost importance to keep their digital identities safe. They are also the gatekeepers to authentic literature and help our students access it and encourage their love of reading. Again, our schools would suffer greatly without full-time access to librarians.

I wholeheartedly urge Mrs. Arntzen to rethink the changes. As a past education employee, I know how vital these people are to the overall well being of the schools. Please, do not make these changes.

Sincerely,  
Laurie Jackson

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Dear Committee members:

As a parent of a middle schooler and a proud graduate of Montana's public school system, I am writing to express grave concern over the changes proposed by Superintendent Elsie Arntzen to our school accreditation standards, especially given the incredibly tight turnaround time offered to Montana's concerned citizens to address such a monumental proposal. The superintendent has had ample time to prepare a plan that doesn't harm Montana's stellar public education system, and instead she is presenting a plan to destroy our schools through lowered standards, reduced oversight, and shortsighted cuts.

I am particularly concerned about the severe reduction and even proposed elimination of librarians, school counselors, music and art programs, and other elective options. These changes are in direct violation of the 2015 Every Student Succeeds Act, which requires that students have access to "well-rounded education". Music, art, and other electives are vital to providing that education.

The reduction in school counseling feels especially cruel given the increased mental health issues our students are suffering in the wake of more than two years of global chaos and uncertainty. The slack left in this care cannot possibly be absorbed by teachers, parents, or even community programs. Even in a well-resourced community like Bozeman, mental health professionals are in painfully short supply.

I understand that Montana is facing a serious teacher shortage. However, the root of that is clear: a gross lack of support for public education from the very official who is supposed to be safeguarding the system. Please do not allow one person to destroy a system that has taken generations to build. Reject these changes and demand that Supt. Arntzen do her job to build up our public schools.

Sincerely,

Nicole Rosenleaf Ritter

Bozeman, MT

---

Ms. Loveridge,

This email is regarding Ms. Arntzen's proposed changes to the Montana school accreditation standards as it pertains to school counselors and librarians.

I am sure you are aware that the United States and Montana in particular are in the middle of a mental health crisis that affects all youth in our country, and Montana rates are increasing more than other states. According to a 2021 Montana OPI survey of high school students, "A third of students surveyed said in the past 30 days their mental health was not good most of the time or always. More than 40% of the students reported feeling sad or hopeless for two or more weeks in a row. About 20% of respondents said they had considered suicide"\*\* To restrict students' access to a school counselor is unconscionable. Teachers, principals, students, and families rely on school counselors immensely. Their work is invaluable to our school community and students would suffer greatly if they did not have access to them full time.

Additionally, school Librarians are one of the most important school staff members. In a digital world, the digital citizenship they teach to our students is of the utmost importance to keep their digital

identities safe. They are also the gatekeepers to authentic literature and help our students access it and encourage their love of reading. During a time when students must access information in every form, it is unreasonable and unconscionable to cut back on school librarians who can guide students through the digital and written world. Again, our schools would suffer greatly without full-time access to librarians.

I wholeheartedly urge Mrs. Arntzen to reconsider the proposed changes to our already struggling Montana school system and not to make these proposed accreditation changes.

June L. Rovero

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To whom it may concern,

My name is Katie Duarte, and I am a Kindergarten Teacher at Corvallis Primary School. I recently learned of proposed cuts that would eliminate or cut school librarians and counselors. This is outrageous that it would even be suggested. Our students are going through one of the most traumatic and uncertain times in modern history and we are just now getting our schools somewhat back in order after the Pandemic. Our librarians and counselors are crucial to our school and our students. They help support our students in numerous ways and our schools NEED these positions to remain in full effect and with FULL funding. Counselors and librarians in addition to music teachers, art teachers, STEAM teachers, and Physical Education teachers are EXTREMELY important to students and their success. I strongly oppose Superintendent Arntzen and disagree completely with her and her proposals. She does NOT represent the schools, students or teachers views and she does not have the best interests of students in mind. It would be detrimental to children if her proposals went into effect. We are educators and our best interest IS the child.

Respectfully,

Katie Duarte

Kindergarten Teacher

Corvallis Primary School

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I am writing you to encourage you to reconsider the amendments that have been proposed involving School Library Media Services and School Counseling Staff. If you agree to these changes, it will have an astronomical effect on larger school districts.

1. Library Media Services: Our Library staff is already at its limit and overwhelmed by being split between schools. Taking these accreditation standards away will allow districts to further cut staff, which will cause even more teacher burnout. We cannot afford to lose more qualified teachers, and we cannot continue to ask more of these teachers.

2. School Counseling Staff: It is absolutely beyond me that this is even a consideration. The mental health of our students has been plummeting for years. Suicide along with disruptive and unstable behaviors are now a part of everyday life. We cannot allow schools to cut these positions.

Furthermore, this is another area where we are having difficulty filling positions. If their caseload increases, this will further affect teacher retention.

I strongly encourage you to look for a better solution than cutting accreditation standards in these areas. We can not make decisions that dramatically affect one district in order to help another.

Sally Ann Bishop  
1st Grade Teacher

Central Heights Elementary School

Billings Schools

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My name is Ashley Jenness and I have been a school counselor for 13 years. In those 13 years I have only had one year where I was under the state recommended ratio 400:1. Currently this year I have 412 students and travel between two buildings. I am constantly reacting to situations instead of being proactive. Being spread so thin I often do not get to all of my students' needs in a day, and then frequently have to wait to see others in need because I am at my other building; this is very frustrating and hinders me from supporting the students and community as efficiently as I would like.

Montana has consistently ranked in the top in the nation for suicide rates. If we take away school counselors, the first line of mental health help to these students, we would be #1 in the nation. We already struggle with finding mental health support in Montana; why make it harder? Please consider the national recommendation provided by the American School Counselors Association and the Montana School Counselors Association of 250:1. While keeping the accreditation standards intact. As a school counselor we have a different skill set needed to perform our jobs, changing or eliminating these standards would not be beneficial for those wanting to pursue school counseling as a career.

Thank you,

Ashley Jenness

[Elementary School Counselor](#)

[Lewistown Public Schools](#)

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Dear Tristen,

Attached is my letter in opposition to Ms. Arntzen's proposal to remove school counselor/student ratios. I hope my letter and all of the others are shared and considered. The mental health of Montana students is already in a precarious state, I do not want to add any unnecessary barriers to accessing students.

[https://docs.google.com/document/d/1aLgBdAh6RbVNeFR5\\_kMgK1Q53GQy0Y-LNQOE6kcKrBI/edit?usp=sharing \[docs.google.com\]](https://docs.google.com/document/d/1aLgBdAh6RbVNeFR5_kMgK1Q53GQy0Y-LNQOE6kcKrBI/edit?usp=sharing [docs.google.com])

Thank you,  
**Molly Wilson**, M.A., NCC

She/her/hers

Big Sky High School

Class of 2023 School Counselor

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 300+ students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

**Jo Johnson**

School Counselor (Monday and Tuesday)

Franklin Elementary School

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To Whom it May Concern,

I am writing to voice my concern for the changes that Supt. Artzen is recommending. I have worked in the public school system of Montana for close to twenty years, most of which have been in middle and high school classrooms. The removal for the requirement of librarians and counselors leaves me speechless.

In a time where society is seeing mental health issues on the rise, to not have the continued support and access to a counselor on campus at all times is what I feel as being neglectful. Teachers are already taking care of so many issues and tending to children's needs that to have the support of a counselor to help with some of the mental and social issues is priceless. Many of the rural communities do not have a counselor for the community and to get to one is usually quite a drive, if an appointment can be made. Not only do counselors deal with social/emotional issues, but they also help with the state testing preparation, they help students make sure their schedule keeps them on a graduation track, and provide resources such as potential jobs and connections to the community.

A school librarian is, many times, an unsung hero. These people provide a safe place for children to go and are there to help children find interests and access to places they did not know existed in their

minds. Reading is such an important part of life and for many teens and adults is found to be a struggle. To have access to a person who enjoys reading and can provide literary support to the students and teachers is a huge help in so many ways. Librarians do not just sit at a desk and read books all day, they help guide and teach children of all ages academically and emotionally as they help reinforce lifelong communication skills. They are another trusted adult that children look to and talk to when the counselors, principals and teachers are not available. Most of the librarians I know also play a big role in technology education, maintenance and supervision.

Please consider the importance that these people play in the lives of children. Not just the younger or just the older, but in all ages. As an educator, I know I would be lost without these people and their support.

Thank you,

Carrie Schmidt

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Hi Tristen,

Please include my comment (below) for the Negotiated Rulemaking Committee meeting tomorrow:

As a certified English teacher (secondary) and a MT Certified Teacher Librarian (K-12) with National Board Certification, and a parent, I have serious concerns about adjusting the MT School Librarian & Counselor requirements under Chapter 55.

- I am concerned Superintendent Arntzen is gutting the ratio requirement for School Librarians and Counselors with either no forethought or actual intent to harm our students. Without requirements, districts or "systems" will be cutting necessary positions. Weakening the requirements and expecting rural (or any!) school system to provide more positions than called for by State requirements is ultimately bad for students and teachers. This is clearly a CUT to important positions in our schools.
- The Superintendent's broad cuts were added in after the Task Force met and counter to their recommendations and discussion, without appropriate review by representative stakeholders, and at one of the very busiest times of year for school staff. This feels like a dirty attempt to slip this in without taking time to listen to actual students, families, and staff. I have a filling cabinet and email folder full of thank yous, student notes, etc. that show my impact on students, and I'm positive our counselors have the same.
- While I understand we are concerned about rural areas filling certain positions, this is not the answer to that problem. Schools failing to meet the requirements and earning a deficiency (with no budgetary impact) provides useful information to the OPI. All of our students, staff, and families deserve access to well-prepared, high-quality school librarians and counselors and fully-funded school libraries, regardless of where in MT they live.

School libraries and librarians are essential to preparing our students for their futures. Myriad studies confirm that school librarians support student achievement and increased funding for school libraries leads to rising reading scores. Each year, my district's Teacher Librarians work with thousands of classes and individuals, helping students with research and critical thinking, and working with them to develop skills to select, evaluate, and use information effectively, and be creators, not just consumers, of content.

Our Teacher Librarians serve on building and district leadership teams, provide technology-training and professional development to staff, run book clubs, lunch clubs, literacy programs, and more. I collaborate with Science classes, English, Government and World Geography classes, Health/PE, World Languages, and more. While we might tend to work behind the scenes and not take enough credit, Teacher Librarians serve important roles in every school, and it would be a huge disservice to our students and families to reduce their impact through this change.

Thank you for your time,

Rebecca Dupre

Teacher Librarian, NBCT

Missoula, MT

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to Student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1.

In my job at the Missoula Online Academy, I currently serve 231 students. Most of my students have academic, medical or social-emotional/behavioral health plans. Many are experiencing homelessness and socio-economic struggles. My students need a tremendous amount of support to succeed at school and in life.

I often adjust my day in an emergency fashion in order to respond to crises at my school. This has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Please help School Counselors do our jobs effectively and oppose Superintendent Artnzen's recommendation to eliminate the School Counselor to Student ratio.

Sincerely,

Crystal Thompson

Missoula Online Academy

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain

in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. I am currently an elementary school principal, but was a school counselor for 18 years before that. Currently, a majority of my day is spent dealing with students' mental health issues and not on other areas of my position, such as instructional leadership. I am often called- to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
Erica Zins, EdD  
Principal, Chief Charlo Elementary School  
Missoula, MT

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Tristen,

I would like the committee to know that Superintendent Arntzen's proposed cuts and changes to our schools is completely out of touch and unacceptable. She clearly has no idea how much our students are in need of counseling services here in the state of Montana. Her only intention seems to be gutting our schools of electives and programs that provide our students with a stellar educational experience. As a parent and teacher, I'm horrified that she would even consider making these changes. My children deserve the arts and other electives that provide our students with so much more than just content: they provide a sense of fulfillment and aid our students in their mental health and personal journeys. Moreover, our librarians and counselors are essential to all students, and the fact is, we need even more of them, not less.

Please maintain our counselor/librarian ratios and preserve our electives and credit requirements in the middle schools.

**Erin Cleveland**  
English 2 & 4  
Capital High School

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Dear Chapter 55 - Negotiated Rulemaking Committee,  
I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain

in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, trauma, substance abuse, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for a School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 300 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
**Hauna Hochstetler**

**School Counselor**

Sentinel High school

Good afternoon Tristen,

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I am contacting you in regards to the proposed changes that Mrs. Arntzen wants to make to the Montana school accreditation standards.

As I am sure you know, the United States and Montana are in the middle of a mental health crisis that is also affecting Montana's youth. To restrict students' access to a school counselor is unconscionable. I am a teacher in a school that would be affected and I can tell you the teachers, principals, students, and families rely on our school counselor immensely. Her work is invaluable to our school community and we would suffer greatly if we did not have access to her full time. Additionally, our Librarian is one of our most important school staff members. In a digital world, the digital citizenship she teaches to our students is of the utmost importance to keep their digital identities safe. She is also the gatekeeper to authentic literature and helps our students access it and encourage their love of reading. Again, our school would suffer greatly without full time access to our librarian.

I wholeheartedly urge Mrs. Arntzen to rethink the changes. Do not make these changes.  
Holly Van Binsbergen

2nd Grade Teacher

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Good afternoon Tristen,  
I am contacting you in regards to the proposed changes that Mrs. Arntzen wants to make to the Montana school accreditation standards.

As I am sure you know, the United States and Montana are in the middle of a mental health crisis that is also affecting Montana's youth. To restrict students' access to a school counselor is unconscionable. Teachers, principals, students, and families rely on school counselors immensely. Their work is invaluable to our school community and students would suffer greatly if they did not have access to them full time. I live and work in Great Falls, and until January of this year I had worked at East Middle School for the last 4 years. I just found out today that a student at East just took their life yesterday. Please make it known to Mrs. Arntzen that the 2 counselors available to the 800+ students there, not to mention the 100+ staff members are not enough to help out. Our schools need more counselors, not restricting the access they do have to the few that there are. My heart is broken for that family and the students and staff of East, who will all need access to these counselors for what they will inevitably have to deal with over the next few weeks of school. Additionally, school Librarians are one of the most important school staff members. In a digital world, the digital citizenship they teach to our students is of the utmost importance to keep their digital identities safe. They are also the gatekeepers to authentic literature and help our students access it and encourage their love of reading. Again, our schools would suffer greatly without full-time access to librarians.

I wholeheartedly urge Mrs. Arntzen to rethink the changes. Do not make these changes.

**Jennifer Ulibarri**

#### **Office Administrator**

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Dear Tristen,

As a Montana school counselor for over eight years and Board of Director for the Montana School Counselor Association (MSCA) I recommend that the student to school counselor ratio match the National recommended ratio of 250:1 and that this ratio remains in the accreditation standards.

I currently have 499 students in my school and like all schools in Montana, we risk losing our CSCT program which currently serves 14 of our students needing the most extensive support. Of these 499 students, I provide Tier I services to ALL of them, as well as Tier II and III services to those who need it. In my experience, mental health services, including school counseling, are utilized constantly throughout the day and are a vital part of every school. We have the highest suicide rate in the nation and mental health is a huge concern in our state. As school counselors, we provide prevention and intervention mental health services to Pre-K-12 students across the state of Montana. **School counselors are an ESSENTIAL part of every school and ALL children deserve access.** In my time as a school counselor, I have supported students who have experienced suicidal thoughts and attempts, abuse and neglect, extensive trauma histories, peer conflicts, anxiety, depression, aggression issues, those struggling with social, organizational, study skills and so much more. All of these factors affect a student's ability to learn. **School counselors follow the ASCA National Model, ASCA Mindsets & Behaviors and ASCA Ethical Standards and provide Tier I, II and III services to help students to be successful academically, socially, emotionally and in life.**

**Please support Montana's children by changing Montana's student to school counselor ratio to 250:1, as recommended by the American School Counselor Association, and ensure that the ratio remain in the accreditation standards.**

Please send me the link to tomorrow's Chapter 55- Negotiated Rule Making Committee Zoom meeting.

Thank you for your time,

Katy Thomas, MA, LCPC  
Professional School Counselor

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I would like to participate in this meeting during public input, but have a prior commitment. It is of the utmost importance the committee is aware of the devastating fallout that would ensue if the school counselor to student ratio is changed, whereby there would be more students than 400 per counselor in Montana.

The American School Counselor Association has recommended for many years the ratio be 1 counselor for every 250 students, thus the most beneficial change that can occur at our state level is to make that recommended change.

I started my career in education in 1984. I taught at Willow Creek Public School for one year, Arlee Elementary for one year, Helena Public Schools for two years and became the first elementary school counselor in Belgrade where I spent the next 30 years. My last year I was proudly elected runner up for the Montana School Counselor of the year award. I was well suited for this profession and was a dedicated counselor. I received 45 graduate credits beyond my master's degree. I'm sharing my background here to reflect that I have a long time history with school counseling in Montana. I have had very large caseloads at times during my career and for two years a small caseload of approximately 250 students. I was responsible for approximately 400 students for most years I served as counselor.

I am able to speak to this issue and am passionately opposed to, both the counselor to student ratio increasing, as well as lowering academic requirements to become a certified school counselor in Montana.

I grew up in Eastern Montana. I am aware it has gotten increasingly difficult for smaller, remote school districts to find enough staff, whether teachers or counselors, to be fully accredited. I sympathize with this situation and understand why alternatives are being considered.

Our suicide rate in Montana has been one of the highest in the US for a long time. It is apparent Montana lacks mental health services for all age groups. To 'weaken' our school mental health services would be devastating. School counselors provide numerous avenues of help and education regarding social and emotional growth for all public school students. We teach a variety of life skills in our classroom lessons for all students (e.g. handling feelings/conflict, being safe in an increasingly unsafe world, learning what it means to be responsible, respectful and a good decision maker and citizen, how to make and keep friends, recognize uniqueness and self-worth). It is with this proactive approach we can reach all students and prepare them for life.

School counselors address specific issues via small groups (e.g. changing families, peer support, behavioral management).

We work with students individually and help to plan with school staff and parents for their success and well being.

We serve as liaisons with all entities involved in helping children (e.g. Department of Health and Human Services, AWARE, Youth Dynamics, probation, law enforcement, Big Brothers & Sisters).

We work to develop school wide activities focusing on things like bullying, friendship, supporting students in need (e.g. those dealing with loss/tragedy, health issues).

We acquire throughout our careers new skills and education via classes, workshops, conferences and sharing sessions.

We provide training for up and coming school counselors by taking them on as practicum students and counselor interns.

Many of us have provided training for parents as well through such avenues as “coffee talk” or parent classes.

On occasion we are asked to represent students in court or work with Guardian Ad Litem programs to help determine the best possible situations for students in need (e.g. foster children, abused and neglected).

It is with these many and varied roles that we need to have a workable caseload and the best possible training. With our hearts, skills and dedication we seek to assist all Montana students to the best of our ability. We cannot do that without adequate training and workable numbers of students on our case loads.

I appreciate you taking the time to read this and am hopeful it has provided insight into school counseling and its importance for our Montana students.

Please contact me with questions and/or concerns.

Kristi Bergland Ragar

To whom it may concern:

Please consider the harm that will be done if students lose access to school counselors and ratio numbers are recommended to be changed. If anything, they should be LOWERED! the National recommendation is 250:1, I currently sit in my position at 325:1 at a Title 1 school and in my career have had upwards of close to 450! That makes it impossible for students social emotional learning needs to be met! We have documentation locally and nationally that shows student mental health is decreasing, Montana is still in the top for suicide, and we are SCREAMING for help in the mental health world. Doing what Ms. Arntzen has recommended would be detrimental to our state, our students, our livelihood and is overall just a harmful and terrible idea.

I encourage you to advocate for mental health, mental health support and even the change in ratio to the national recommendation of 250:1.

Thank you for your time and attention to this matter.

Sincerely,

Kyrstyn Manfull

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 500 students, with the help of a .2 counselor. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. The number of suicide risk assessments I've done this year increased from an average of 2 to about 20 this year. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,

Linsey Myers

(she/her/hers)

School Counselor

Lewis and Clark Elementary

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In fact, I believe it should be reduced. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve over 300 students for two grade levels (6th and 7th at Whitefish Middle school). I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas. It is not only mental health services that we provide, but advocacy. We attend, participate, and lead a number of integral meetings that meet the needs of students at Tier 1, 2, and 3 levels. We are also a part of prevention within our buildings

and districts. All of these aspects are important roles that we will serve, but are also time consuming. Increasing the ratio will reduce our effectiveness and efficiency in supporting the youth and their families within our buildings and districts.

I strongly discourage you from considering this recommendation. The citizens of Montana have demonstrated the need for prevention, crisis response, access to support, and intervention if you just look at our suicide rates nationally. We need more support, not less. Thank you for considering our request. If you would like to speak further, I would be happy to share my perspective as well as information with you.

Sincerely,  
Annelies T. Pedersen

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Dear Members:

I would like to comment on the proposed changes to student/counselor and student/librarian ratios. The proposed changes would adversely affect students in my district. They are bad policy. These positions are already stretched thin. Imagine if your child's counselor had 500-600 clients a week? Imagine a librarian trying to manage it alone and in one or two days a week?

In small rural schools, sharing and consortiums may make sense, but sweeping across the board changes like this will have negative consequences in the form of cuts in staff and services for thousands of Montana students. It will make counselors and media specialists an easy target for cuts at a time when their support is needed more than ever.

I sympathize with rural schools, being a product of one. Staffing is an issue. But other solutions must be found.

Thank you for your time,

Dean Lapke

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Please **maintain the current** librarian and counselor **ratios**. To do less is unfair to the students and particularly those in rural locations. These are needed services for adequate education and support of our children.

NJ Shepard

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I am a mother of three children in the Bozeman school system. My teenager attends Gallatin High School, while my younger two attend Anderson School.

I oppose the recommendations by State Superintendent Arntzen to eliminate safe staffing ratios for professional mental health counselors and librarians in schools.

It appears that these changes, which may be needed in some specific rural schools, are being applied to all schools — regardless of the students' needs.

These changes will weaken educational standards, resources, and support for all students. It is unacceptable. Furthermore, these threatened cuts come amidst a national struggle in youth mental health. Montana families — including my own — are living this struggle. The impact it will have on us, and families like us, will be significant and detrimental.

Thank you.

Erika Madden

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Hello,

Now, more than ever, it is imperative that our schools and students have access to a designated counselor and librarians. These incredible people are invaluable to creating and maintaining a functional learning environment for our students to thrive. Please tell Elsie Arntzen no and maintain the counselor and librarian ratios in Montana Schools.

Thank you

Sara Feilzer

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Education Director

To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,  
Kylie Barnes

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To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. As a high school Language Arts teacher, I rely on our librarians to maintain a well-stocked, student-centered library in which students may access up-to-date materials, databases and important instruction in research.

Our libraries are the hub of our schools. Please don't take them away.

Yours sincerely,

Katy Paynich

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To the Negotiated Rules Making Committee:

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Yours sincerely,  
Hanna Niles

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Yours sincerely,  
Rachel Kantor

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Yours sincerely,  
Melissa Boari

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Yours sincerely,  
Riley Warren

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Yours sincerely,  
Tara Lind

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Yours sincerely,  
Agnes Brekhus

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Yours sincerely,  
Heidi Cowan

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Yours sincerely,  
Amy Heuiser

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Yours sincerely,  
Teal Hatten

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Yours sincerely,  
Katie Hillock

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Yours sincerely,  
Diane Jensen

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Yours sincerely,  
Tifeny Solan

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Yours sincerely,  
Skye Hatten

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librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,  
Amanda Anderson

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Yours sincerely,  
Tomi Bick

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Yours sincerely,  
Alia Hanson

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Hi there. As native Montanan with a home in Helena who is moving back this summer with her children — I am writing the committee in support of all children in Montana and their access to learning, support, and the arts. I urge you to maintain the librarian and counselor ratios for our schools. I am also in strong support of preserving specific electives + credit requirements for our middle schools.

Superintendent Arntzen's recommendations will harm our students and their education.

Thank you for your careful consideration.

Molly Mahar

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Dear Mr. Loveridge,

I am writing to implore you to deny changes being proposed to our state public education program. It is imperative now more than ever that we provide children with a supportive, rigorous and enriching educational program that continues to nurture the whole child while maintaining high standards.

Please keep our current student to teacher ratios for counseling and library science. Our counselors are absolutely critical in supporting our children through the traumatic experiences we have faced over the recent past. Our librarians are essential for providing and maintaining authentic and reliable resources for our students in the age of false or misleading information.

Additionally, the visual and performing arts bolster learning and provide students with alternative opportunities to express their voices and release their creative thoughts, ideas and emotions. I ask that these be kept as mandatory components of the middle school program and not relegated to, "Elective," status.

In these challenging times, our children need your support more than ever. Please don't pull the rug from beneath their feet.

Respectfully yours,  
Catherine Ahlin-Moore

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Greeting from Bozeman.

I am writing to object to Superintendent Arntzen recommendation that school counselor ratios be reduced.

I further my objections to her recommendation that librarian ratios be reduced.

Thank you for taking my viewpoint under consideration.

Noah Poritz

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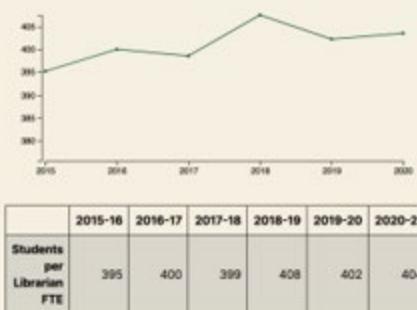
To the Chapter 55 negotiated rulemaking committee:

I have reviewed all minutes of both the Chapter 55 task force and negotiated rulemaking committee meetings. I urge you to reject Superintendent Arntzen's recommendations in the area of staffing levels for school counselors and librarians. Superintendent Arntzen proposes eliminating librarian and counselor pupil to staffing ratios. Much of the Chapter 55 school quality task force's discussion on this issue was about the 51 of 56 emergency authorizations to release schools from the librarian requirement. One could assume that these positions are difficult or impossible to fill because there aren't enough librarians. However, in 2018, **Superintendent Arntzen, Professor Anne Kish (UM-Western) and I co-authored a report using data from OPI to demonstrate that there is a surplus of licensed and endorsed librarians and the two Montana preparation programs graduate more than enough completers to meet demand. The work plan approved by the Superintendent outlines how to strengthen librarian recruitment and understanding of the beneficial role of the school librarian.** While this report is four years old, I do not believe that the situation has drastically changed. **Please see the attached report.**

So why are the overwhelming majority of emergency authorizations about librarians? First, a librarian is not typically an instructor of record, so the pressing issue of securing a classroom teacher is not at the forefront. Second, it is not difficult to write an emergency authorization proposal for a librarian because nearly every county has a public library and EAs typically reference the public library as part of alternative program delivery (I wonder whether some of the public libraries even know they are being utilized this way). Third, I speculate that EAs are almost always approved by the Superintendent. It would be interesting to know how many are rejected; I have not been able to obtain this information. Therefore, a school can write a fairly simple proposal with almost guaranteed approval along with salary savings. I believe that this incentivizes schools to avoid hiring a librarian. The same can be said about counselors. Librarians and counselors enrich students' lives in immeasurable ways. Eliminating these staffing ratios is a mistake. **A very small number of Montana schools have issues with recruiting licensed and endorsed librarians.** The proposal before you creates a "solution" for this small number of affected schools by eliminating staffing ratios for the vast majority of schools that have historically been and are currently in compliance. **Montana has the lowest librarian to student ratio in the country (see <https://libslide.org/data-tools/state-profile/?saved=MT&type=stateprofile> [libslide.org] and graphic at the end of this email).** We should be proud of this and maintain current staffing ratios. I implore each NRM member to ask for the data to justify eliminating these ratios and make an informed decision. **The information you have is not the complete picture.**

Finally, the Superintendent appointed Deputy Superintendent Allen to the negotiated rulemaking committee. Given the fact that the Superintendent can override the NRM committee's decisions and propose whatever she wants for BPE's consideration, I must question why Ms. Allen was appointed. Please think about the influence that Ms. Allen, a political appointee, has had during this process. Superintendent Arntzen proposes to lower the bar of basic school services under the Montana Constitution under the guise of "flexibility" to address a teacher "shortage". "Flexibility" is a term that politicians use to systematically dismantle requirements that children have educators with specific areas of expertise. They claim that the requirements stand in the way of resolving a supposed teacher "shortage". **The Montana Department of Labor and Industry published a 2017 report that other than just a few subjects, there is an adequate Montana-prepared workforce to staff our schools. Please see the attached report (pp. 67-77) which states, "If employers find it difficult to fill oversupplied occupations, then the issue is likely one of distribution and retention, not capacity" (p. 72).** The distribution problem is systemic, and it will continue to be. Until an adequate monetary investment is made in public education, the issue will not be resolved. Lowering the bar does not fix anything.

## Students per Librarian FTE



MONTANA is ranked 1 of 51 states (and D.C.) for the most current year.

[Show Table](#)



Ann Ewbank

Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need.

The last few years have brought a significant increase in our students' mental health challenges - including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1.

I have been a school counselor for twelve years and I have served as a foster parent to three of my students. This past year, I switched to part-time which was a welcome change in pace. I am being completely honest with you when I say I was near burn-out. As school counselors, we serve in so many capacities. We are available to ALL students - not just a set few. My position at my new school was created because there was a huge need that two full-time school counselors could not fill on their own. Mental health does not discriminate. I have worked in the lowest SES zip codes in WA state and now in one of the most affluent zip codes in MT. All students benefit when their mental health concerns can be addressed.

School counselors have been the backbone of mental health since the pandemic. We are the ones who are available, can meet in person, don't require extra appointments/transportation for parents or charge a fee that may or may not be covered by insurance. We also don't have waiting lists - we see everyone regardless. In rural areas where there is no other access to mental health, our role is vital. Our pay is pitiful. And in Gallatin County, where the average cost for a home is now nearing \$900,000, you are asking too much of us if you eliminate the counselor to student ratio. A base salary of \$46,00 doesn't cut it.

We recently lost our comprehensive mental health teams that served many of our challenging students due to budget cuts and I cannot fathom why on earth this would be seen as the next step in a positive direction. This elimination would send a very clear message that Montana doesn't put students first and that we don't value mental health.

It does not matter if a student can learn several languages, earn top test scores and take advanced classes. If a student cannot manage emotions, stress and resolve conflict, what they learn academically isn't going to matter. Social/emotional learning is the foundation for a healthy life. Period.

I really wish you could be a fly on the wall in my office and see and hear what I do everyday - it would break your heart. Perhaps though, that's what you need - a strong dose of reality to invoke some empathy and realize that our students and younger generation should be our priority.

Sincerely,  
Lindsey Ross

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Committee members,

I am shocked that such sweeping and impactful changes were on the agenda. These changes do nothing but limit access to the highest level of education and services Montana students deserve. They limit access to mental health services, they limit the research-based benefits of a certified library teacher (and an actual library!), they limit access to a well-rounded education in the arts, they limit access to the top-level science education needed in the job market. WHY would we want to LIMIT benefits to our children, especially those in rural areas? I'm sure there is a right-wing agenda in here, but this really should not be a political issue, we should be INCREASING opportunity not LIMITING opportunity.

Limiting school counselors in a state with one of the highest teen suicide rates, several here in Helena just this year, is just plain disgusting. Cutting library services that help students learn to find and love reading and teach the important technology and research skills they need to do well in life makes no sense. I am lucky to see how kids benefit when we invest in the highest-level education every day. This moves in the opposite direction.

Jena Marshall

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Please continue with the current ratios of a full-time counselor per 400 K-8 students and 400 high school students in Montana public schools. I work in a public middle school. School counselors really matter in public schools. Throughout my four decade career, I've seen how counselors keep students moving forward. Students in need should have access to the mental health skillsets that counselors possess. Many students are dealing with issues that they have no idea of how to cope with in a healthy way. Teachers need school counselors to help us understand how we can better work with students who are struggling or in crisis.

As a child, I personally benefited from having access to a school counselor. At Bozeman Junior high school in the late 1960's, a counselor named Mrs. Dale helped me cope with abusive experiences in

my home. She helped me process my thoughts and feelings, and make healthy progress. My family would never been able to afford therapy. How fortunate I was to have had that opportunity!

We need counselors for our Montana youngsters. Please, keep our Montana schools strong by providing school counselors for our public schools. Thank you.

Nancy Loeza'

---

Good Evening,

My name is Rebecca Croghan. I am a teacher in the Belgrade School District. I am writing today to request that you maintain the current librarian and counselor ratios. It is no secret that our students are experiencing a mental health crisis of epic proportions. Now, more than ever, do our students need guaranteed access to counseling provided in the public school environment. Our students also need access to professionals who are trained and understand technology and media and who are dedicated to preparing students to be effective users of ideas and information. Removing the ratios would be detrimental to our students who should be guaranteed access to school counselors and school librarians.

Thank you,

**Rebecca Croghan**

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Is this really the time to consider access to mental health support?

Posted on Facebook today. Whatever the details of this tragedy, our children deserve to have easily accessible and enough counselors ::

Our Condolences:



June Rovero

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Hello,

As a lifelong Montanan and a product of the Montana public school system I am dismayed at the prospect of changing the ratio of counselors to students. Now more than ever kids need access to counselors and services provided by them. It's clear to me that this change would be a massive mistake by OPI.

Sincerely,

Aimee Anderson

---

I'm writing today to support school counselors and the valuable work they do in schools across the state. My children attend a small school in Missoula County and have both greatly benefited from the support of the school counselor. We are an involved family and have access to private services outside of school, but have also utilized the school counselor for day to day support of our kiddos during the school year. Making student/counselor ratio higher would impact the amount of care and support counselors could provide to their daily caseload. I know that it takes a team and a village to raise healthy and safe kids. Counselors play a vital part in that work. Raising the ratio would mean less time to give to each student. That support would impact teachers and staff, as well as students and families.

Thank you for your consideration,

Laura Zumpfe

---

Dear Tristen,

Please convey my concern about the proposed changes to the ratio of School Media Services and School Counselors. Now more than ever, all Montana students deserve the opportunity to have access to a well-trained school librarian and counselor.

I am against these changes, which would disproportionately harm rural students.

Lisa Moore

Reading Specialist

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Negotiating Rules Committee members,

As an educator for the past 28 years, there have been many things that have changed in education in the State of Montana. This proposal to reduce the number of counselors is absolutely ludicrous to imagine. Have you been "in the trenches"? There are more kids than ever who need some kind of counseling now more than ever. The beginning of my career saw very few kids who needed anything beside career counseling. Today the number has averaged about one every two weeks for referrals to see a counselor. While these numbers are based on observation only, it is still significant.

To top this all off, there is discussion to also cut back or eliminate library, music and art? For some of our students, that is what keeps them coming back day after day. For some, it has turned into a life's work for them. If we cut these programs, those students will slip through the cracks and never again be seen in public education again. It seems like we should be trying to get more students in the doors rather than driving them away from public education. Isn't a FREE and PUBLIC education guaranteed by the constitution? Last time I checked we live in a democracy where the majority rules, NOT the minority.

Please reconsider the direction your committee is taking. This could cause irreparable damage to our future by jading entire generations of students away from the public schools.

Sincerely,

Lynn Mason  
Teacher

Dear Dr. Loveridge:

I'm writing to weigh in in the strongest possible terms.

I ask that you share my sentiments with the Negotiated Rule Making Committee.

Please maintain the librarian and counselor ratios.

Also, please maintain and preserve the specific electives and credit requirements for middle schools.

All such changes under consideration will only diminish educational quality and opportunities available to public school children. This will clearly be the opposite of progress. Quality public education is part of Montana's Constitution. Therefore, moving in the direction of the proposed changes is really moving toward denying Montanans some of their constitutional rights. I urge you, the Committee, and Ms. Arntzen not to go down that path.

Respectfully,

Mark Kayll

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I have just come across Superintendent Elise Arntzen's suggestions related to mental health care and Montana's school libraries.

I understand that there is a meeting Wednesday regarding this, however, I have been given your email to send my own questions and concerns to.

I have grown up in libraries, with the support of librarians and the vital work that they do. For this person claiming to be a Superintendent of Education to state that the students of Montana do not deserve libraries...librarians...or mental health support (particularly in the age of COVID!), I am disgusted and disheartened. Ms. Arntzen (I'll call her Superintendent going forward when she has EARNED the right to be called this) yet again is showing her disdain for Montanans, for Montana's children and their families' needs.

Librarians help children find their curiosity and focus it into something that can drive life-long interests. School counselors help build trust between the students and their educational teams. They help when the kids need a safe space to work out their worries and concerns - and when a kid is threatening suicide they can save lives. Literally save lives. Counselors can also help these kids run with those life-long interests and find a life-long career. I ask you: What person with the title of Superintendent of Education take these things away from the children and the schools? How DARE

she?

During a time when kids' support systems at home may be stretched thin as it is (COVID) why would she even threaten to take away the escape and support platforms that Montana's kids need? My family has been active in Friends of the Library for decades, and have been actively supporting librarians, and schools in general. We always vote for the school-related levies because the kids are worth it, and we also vote accordingly.

I ask you to please think of Montana's kids. Let them learn and love what they learn. Let them read and find inspiration and JOY. Let the Librarians lead them!

Also think of the Counselors - and think of how many lives they save every single year. Think about how NEEDED these two groups are.

Stop Ms. Arntzen's madness. Don't let her get away with taking away Montana's education supports.

Thank you,

Shonna Rhein  
Missoula, MT

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Please keep established guidelines for librarians and counselors in our public schools. We have thousands of at risk students in this state who need their services. Libraries are often the only safe place a student has to go to, and the counselors have saved countless lives. Both groups play critical roles in their schools and our children need them.

Therese Michalson

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Dear Tristen,

I am writing to you today to express how important it is for K-8 students to have access to both Library and Counseling staff. Due to the current environment, these resources are more important than ever for students.

Thinking especially of Counseling services and how children in 2022 are needing this service more than ever whether it's for their own mental health or a safe space.

As for the Library, the basis of schools and education is to provide children with resources and skills so they can learn within a classroom but also on their own. A Librarian provides that support outside of their classroom so they can explore and have some independence outside their homeroom.

The proposed changes will effect all students and families. And while our state grows at an unprecedented rate, and where there are already existing challenges, these resources need to be protected so we can cohtinue to support our students and community -- no matter what size of the school.

Thank you.

Dear Ms. Loveridge,

Please hear my plea to maintain the librarian and counselor ratios for school accreditation.

Kendra Veit

2nd grade

Malta Elementary School

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To the Negotiated Rulemaking Committee:

I am writing today to **oppose** the Superintendent's proposed changes to the Chapter 55 ratio of school counselors to students in Montana schools.

I propose, rather, a change to match the National recommendation of 250:1.

School counselors provide social/emotional, behavioral, academic, and career education for every student. My current caseload is unmanageable at 400+ students. Removing any sort of standard or recommendation would place the important work we do at risk and potentially give districts an out to not support the needs of students. Particularly, in this post-pandemic time, students are demonstrating greater social emotional needs. Your own YRBS data indicated this need.

Else Artzen attended our MSCA state conference, as what we thought was a demonstration of support. I feel disappointed, disregarded, and undervalued.

Please do not let this proposed change to Chapter 55 be a backdoor cut to school counseling services across the state.

Please also send me the link to tomorrow's meeting.

Kindly,

Leah Kreitinger

**Sacajawea Middle School**

*School Counselor*

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Good evening,

I am writing to express my concern regarding Superintendent Arntzen's recommended changes to eliminate ratio's for School Counselor's in Montana. At the current recommendation of 400 student's per counselor Montana is already well above the national recommendation by the American School Counselors Association which is 250 student per counselor. In my current position as a high school counselor I have a caseload of 308 student and can barely meet the mental health needs of my

students. Our school also lost our funding for CSCT this year and I have taken on about 20 high need students that require intense mental health support that I cannot provide. Our students are struggling under the weight of the rising mental health crisis resulting from the impact of the pandemic, economic fall out and the cultural climate in the United States. I am frankly flabbergasted and the lack of insight into what School Counselors and schools are dealing with on the frontlines with little resources, low staffing, and exhausted, burned-out staff. We in education have worked tirelessly through the past few tense and overwhelming years and so the suggestion that we take on even more students per counselor is honestly insulting and degrading.

PLEASE, PLEASE pass this along to Superintendent Arntzen- DO NOT eliminate the ratio standards for Montana School Counselors! You clearly have no idea of the detrimental impact of this change or you would hopefully not be suggesting it.

Thank you for taking the time to read this message.

Tracey Robecker

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Tristen -

My name is Thom Peck and I am the Superintendent at Lewistown Public Schools. I would like to make a strong opposition to Superintendent Arntzen's Chapter 55 recommendation on school counselor's ratio and that the current ratio should remain in the accreditation standards. Based on the Youth Risk Behavior Survey from 2021 for Lewistown and across Montana, our students need MORE mental and emotional support from school counselors. More students have anxiety, depression, suicide ideation or even suicide attempts, According to the data, more kids have a deeper need for a sense of belonging than ever before. If students are not healthy mentally or emotionally they cannot be their best academically. If there is anything we learned from the pandemic is that people need people - kids make bad choices if they are not supported mentally or emotionally.

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Please strongly consider NOT changing the direction of counseling and library services. Staff are already stretched too thin to adequately help students. In the counseling field the needs and risks are so high for families and students. It would be a huge disservice to all.

Thank you,

Danielle Althoff School Counselor and LCPC

**School Counselor**

**West and South Elementary**

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I write to oppose proposed changes to Chapter 55. These changes would limit student access to counselors and librarians, two resources that are essential to youth in our community. Particularly with the mental health crisis plaguing young people, counselors and librarians are vital to students' education and well-being. As a teacher and a parent of a student in the Helena School District, I urge you to maintain the current language of Chapter 55.

Thank you,  
Rebecca Leaphart

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Dear Mr. Loveridge,

Please do NOT agree to Supt. Arntzen's recommendations to make changes to librarians and counselors for small schools. Our students in small schools deserve the same opportunities and services as any other child. As an English teacher, I know that reading is central to everything else in a child's education. When I meet adults who cannot write well, I know they also cannot read well, which means they cannot learn easily. Librarians are the keepers of the flames and have helped children learn to love reading for years!!!

We have a burgeoning crisis in mental health across the country, and Ms. Arntzen's recommendation is to remove the requirement for a counselor for students who are struggling? We should increase this, not eliminate it.

As a person who has worked in education (both staff and faculty, from K-12 to higher education), I know her recommendations are contrary to good educations for our students. I am asking you to do what you can to protect our most precious natural resource: our children. Please do not agree to these ridiculous attempts to weaken our educational system.

Respectfully,

Karen L. Henderson

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As a retired teacher of 30+ years, I'm asking that librarian and counselor ratios be maintained and specific electives and credit requirements for middle schools be preserved. The recommendations made by Superintendent Arntzen do not benefit students.

Tobi Sandiland  
Helena, MT

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Greetings,

I was recently made aware of Superintendent Arntzen's recommendations to eliminate the ratio requirements for school librarians in Montana public schools. I am opposed to this recommendation.

This recommendation will eliminate Montana student's access to school librarians, and unfair disadvantage students in rural schools. [Research \[irs.org\]](https://irs.org) supports the positive impact of certified school librarians on student academic achievement, even when adjusted for socioeconomic status. Librarians are responsible not only for ensuring a quality collection of materials to support the curriculum and learners recreational reading needs, but promote reading, collaborate with teachers to ensure learners gain much needed 21st-century information literacy and research skills, and teach digital citizenship to help keep learners safe and ethical online.

An uneven distribution of school librarians will result in a loss of equity across the state and be a severe detriment to student academic achievement and engagement with reading, literature, and inquiry.

Please do not change this accreditation requirement. Ensure that Montana's students continue to have access to rich, well-curated resources, and instruction in skills needed for career, college, and community in the modern global age.

Sincerely,

Deborah Rinio, MLS, PhD

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As an elementary school teacher, I am impressed every day with the number of students who depend on our counselor to help them in all aspects of their lives!

Families are in crisis more than ever with issues connected to covid, housing prices, inflated food and other living expenses.

This is not the time to be removing services our children need, to be able to survive, in a very confusing world!

Dale Hannon, Cherry Valley, Polson

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Hello there,

I am Sara Poff, a 3rd year paraprofessional at Jeannette Rankin Elementary in Missoula, and a school counseling graduate student. Hearing about possible cuts to staff is so worrisome, as I work everyday in the schools and see the intense need for these positions.

Librarians are so important to making reading fun for students and ensure that students of all ages and socioeconomic status have access to reading material. Growing up low-income myself, the only time I got to read books they were checked out from the library. Minimizing librarians means taking this direct chance to engage in reading in a fun manner and taking it away.

Additionally as a school counseling graduate student, I feel devastated thinking about increasing the the ratio of students to counselors 400:1. The American School Counselors Association (ASCA, 2022) recommends an average counselor to student ratio of 250:1. Exceeding this amount by 150 students takes away a chance for a counselor to do their best work for students, which is necessary in a world that is changing so greatly and impacting the mental health of children. Social and emotional learning can be done in the class to a certain extent, but not as much as needed to really make an impact and teach coping skills to the kiddos who need it, and again, those who are not able to access this care otherwise.

A vote to change the limits of counselors and librarians is a vote to hurt kids, especially those who need that extra love and care because they don't have access to those resources at home.

Thank you for your time,

Sara Poff

Please maintain the counselors and librarians in our schools. This would negatively impact our rural schools.

Sincerely,

Patty Donnes

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Please do NOT change the existing number of counselors in MT schools. We are literally in a mental health crisis in our public schools, and need more, not less counselors. Arntzen's proposals are out of touch with what teachers are dealing with in our schools.

Julie Hippler

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Hello,

I am writing in response to the proposed cuts being recommended by the State Superintendent. I was in education for over 3 decades as a teacher, counselor, and principal both in Montana and Minnesota. I have been retired for 3 years,

As I reviewed the recommendations I was saddened to see the cuts/potential setbacks that are being suggested for the School Librarian positions, and the counseling recommendations. Please make sure that you are truly aware of the ramifications that these changes may yield.

As a teacher and administrator I found the role of a licensed librarian to be so worthwhile. A library is a room filled with books and yes a teacher or other staff can check out a book for a student, but a librarian brings the room alive and engages the learners with a beautiful knowledge about authors, genre, and much more. I remember a student that did not like to read but found an author that engaged him. When talking with the librarian she shared with the student another author with a similar style and encouraged the student to explore that author. The student did and was so grateful to the librarian for the discussion and wonderful suggestion. This is just one example of their many talents.

As I read the suggestions for the counselor ratio I was sickened to think that the possibility of a counselor position being eliminated or reduced to a consortium/oncall type presence. A counselor needs to be available not only for the students, but the staff as well. This is not a position that is phoned for a crisis, it is a position that helps with daily life skills. We already have an extreme mental health crisis in our state, minimizing the ratio and presence in schools of counseling staff would only exaggerate this terrible disservice.

I could go on with many more thoughts and reasons why these changes are so detrimental to our educational system, but I believe you get my point. Please be cautious and slow moving to adopt the drastic changes that are being suggested.

I would gladly go more in depth on this if you feel it would help. And rumor has it that the fine arts are also being considered for reductions.... I am not going there right now but our students need these expressive means in their well rounded educated selves... Ok I went there a little :)

Thanks for listening and I believe true educators and people that truly believe in education will shut down the recommendations of the State Superintendent in order to save the children.

Please contact me if you have any questions.

Sincerely

Barbara Cunningham EdD

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Hello!

My name is Kate Dramstad and I'm writing today as a proud graduate of the Helena public schools system. I was recently made aware of some proposed changes to school counselor guidelines that have me quite concerned.

Counselors are an important part of schools for many reasons, but one particularly close to my heart is how they work in tandem with teachers to better serve children. Kids have a lot going on in their lives and much of that ends up surfacing in the classroom and teachers just have to deal. When they have a great partner in a school counselor, they can address those issues in other ways and it takes the burden of dealing with all of it off of the teacher. Today's ratio of 1 counselor per 400 kids is already too high. If we remove that guidance, the support that our kids *AND* our teachers receive will be much decreased. As I read the guidance, one counselor *per school system* will not be able to support even close to the cases that are supported in the district today.

I strongly recommend not moving forward with these changes. Thanks for your time!

Cheers,  
Kate

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I am adamantly against Ms. Artzen's proposed changes to requirements to school counselors and librarians as I understand them. Both of these positions are essential to public education, and to reduce or eliminate the ratio of staff-students for either position could be catastrophic. As a former high school counselor and a citizen of a country where kids are going off the rail at every turn, I know how important it is to have counselors in every school. I cannot begin to count the number of times, in my short tenure as a counselor, we dealt with students in crisis in our school. While a librarian may seem like a luxury, the knowledge of the world that they expose our children to is, in fact, essential to a well-rounded education.. In addition, the library is often a safe place for students who don't feel like they fit in anywhere else. Again, I experienced this first hand in my tenure at Havre High School.

I strongly oppose both of these proposed changes.

Karla Bolken

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Dear Tristen,

It's critical that our youth have access to both librarian's and school counselors. Montana youth must have access to school counselors. Our community recently lost two youth in a tragic car accident on the way to school early one morning. Because our schools have an excellent mental health program and those counselors have the extremely important relationships with our students, our team of in-school, mental health professionals was able to meet the mental health needs of the youth who experienced the trauma of losing classmates. What a tragedy they had to face, why would anyone ask them to endure the hardship or similar tragedies alone?

The covid pandemic and increased access to social media have been significant stressors for our families and students. Please give them the hope and tools they need to survive and thrive in these difficult, unprecedented time. We need more counselors and librarians, not less!

Keep our mental health programming and access strong for our students. Please do not reduce the recommended ratio, and instead find ways to support increased access to mental health for our youth. It's the best kind of preventative medicine, if we can help youth better cope with trauma-related experiences so that when they enter adult hood, they have the tools and resiliency needed to endure all that life brings. Please fight for the mental health access needs of our youth.

Thank you for listening,

Julie Riley,

Volborg, Montana

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Dear Negotiated Rules Making Committee,

I urge you to reject Superintendent Arntzen's proposal to do away with student enrollment ratios for school librarians and school counselors. As we've seen with the pandemic, the mental health struggles of our students are only worsening; giving school districts license to remove counselors is remarkably short-sighted and counter to the scientific evidence that ADDITIONAL support is needed now more than ever. And Superintendent Arntzen herself has emphasized the importance of reading and evidence-based teaching practices. Those evidence-based practices point strongly to the important benefits that school librarians bring to students and teachers alike.

Montana can be proud of many things. Saving money while reducing educational quality should not be one of them. Support student learning and personal and professional growth by maintaining the rules that keep qualified counselors and librarians in our public schools. If anything, these ratios should be reduced to ensure students receive more of the important support they need.

Sincerely,

Stephen Roth

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I am concerned with early childhood education and its funding.

Please DO NOT reduce librarian and counselor ratios, the best money is spent early!

Regards-

john linstrom

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Dear Rule Making Committee: Please don't change these rules and cut the essential staff positions. Cutting these services is a bad idea. We value our children and their education. Saving a few dollars for what? Montana has a very good education system , no need to degrade something that is functioning for the benefit of students and thus the future of the state.

Sincerely,

Peter Stone Polson, MT

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**Written Public Comment**  
**Staffing Ratios**  
**Received May 19<sup>th</sup>**

Good Morning Mrs. Arntzen,

To put it mildly, I am terrified by your idea to cut the counselor ratio in schools. As a 30 year educator with half of that time as a K-12 Counselor, I have never seen counselors MORE necessary than RIGHT NOW! Do you have any idea what the suicide rate in MT is for kids? Do you? This pandemic has helped contribute to the declining mental health of youngsters of every age. Everywhere one looks, there are articles, television and news programs, and town meetings about the mental health challenges Montana's (and every state) students are facing. Do you care about the weekly phone calls I receive from concerned and frightened parents? Educators see it EVERY DAY! We are exhausted and burned out - with lines of students waiting to see us. If anything, schools are seeing the need for MORE counselors, not less. Have you seen the latest numbers in the MT Youth Risk Behavior Survey? And of course MT is a rural state - EVERYONE (well maybe not everyone) knows that mental health issues are compounded by living with no access to mental health care for 100 miles or more. School counselors are often the ONLY therapists out there for kids and their parents. SO, requiring no counselors in rural schools is beyond frightening. Consortiums and Co-ops are fine, but cannot do the job of a counselor on staff. It sounds as if you don't think rural schools and rural kids deserve counseling services, when they are the population who need it more than anyone! My own daughter, an elementary teacher, took a class to be the part-time school counselor in her rural school in MT - ONE CLASS! She has never had such a frustrating year! She tells me she was not prepared for the student problems she was faced with. But WHY would she be?

I had thought, and hoped that the stigma of getting counseling was getting less. But now you want to move the clock backward. No counselors to be found - no counselors to see. MT's "pull yourself by the bootstrap" mentality will continue to grow and there will be consequences. If OPI is worried about schools getting counselors, they needn't be. More and more professional school counselor programs are available in MT with MSU-B, UM, MSU, MSU-N all having Master's programs. SOMEONE recognizes the importance and vast NEED for professionals in these positions. The program in which I received my degree, MSU-N, required 60 credits; and included 30 credits of MENTAL HEALTH study.

Please, PLEASE, don't let this change happen. If you have children, or grandchildren, or care about Montana's children at all - you must understand that Montana's mental health crisis is real. Our nation's mental health crisis is real! And it's getting so much worse. Our nation's political climate, COVID, socioeconomic differences, drug availability and use etc. are impacting the family model; which is impacting the students in our schools. Montana is 3rd in the nation in suicides, with young people being a shocking piece of that statistic. LGBTQ+ students, of which my school has at least 25, are at the forefront of that statistic. Montana's kids need MORE help, not less.

Before you cut counselors, do your research. Talk to administrators, teachers and counselors in schools. Don't be that ONE uninformed person to push this idea on Montana's schools. **You have a responsibility to help Montana's kids.**

Thank you and very respectfully,  
Kristy Z. Powell, 6-12 Counselor  
Three Forks Schools

To YOU as public trustee for MONTANA PUBLIC EDUCATION:

I am writing out of grave concern for the sweeping changes Superintendent Arntzen is attempting to make to accreditation standards for our state. Once again, the job of a Superintendent of Public Education is to provide "vision, advocacy, support and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's opportunities." These changes show Superintendent Arntzen, once again, cannot meet the mission which it is her sworn duty to uphold.

The first change proposed is a change to school counseling staff. Coming out of a pandemic, students are struggling with their mental health. Rather than support those needs the proposed change actually eliminates the current ratio potentially eliminating all school counseling positions. This change must be rejected.

The next change eliminates the ratio for school library media services. Librarians provide a necessary curriculum showing students research and citation skills, help select quality reading materials, and support teachers and students with technology needs. According to the Superintendent, a central library is unnecessary to education and librarians as well. Again, this change should be rejected.

Finally, the Superintendent is making sweeping changes to the requirements for middle school education as well as the specific requirements for music, foreign languages, career and technical education and other exploratory courses. Please reject these changes as well.

These changes are taking a wrecking ball to current standards and programs in our state. It is clear Superintendent Arntzen does not understand her role, nor does she care to learn how to make public schools stronger for students. These are all vital services as well as descriptors of programs that keep students engaged. They must remain in our public school system.

Sincerely,  
Elizabeth Halverson

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Good morning! I'm writing about dropping the requirements for librarians and school counselor positions. I've been a librarian for 16 years in Anaconda. I am so grateful to have found such an amazing profession and I am so proud to be part of it.

Both librarians and counselors provide important pieces of education. I feel by eliminating ratio requirements is doing the opposite of what educators are trying to accomplish. If we are expected to teach rigorous content, shouldn't we expect high expectations for teaching staff? If the ratios are eliminated, we are telling librarians and counselors their jobs are not important. Schools will not be expected to fill those positions and students will suffer.

Thank you  
Anne Calhoun

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Superintendent Arntzen,  
As a faith leader, community leader, and parent I am appalled by your move to remove and limit counseling services in our public schools. Our Yellowstone Valley Suicide Prevention Coalition has recently discussed the need for an increased need for counseling in schools to prevent suicide. This reversed course on this need. Please reconsider your current action.

Thank you for your time.  
Respectfully,  
Rev. Tyler Amundson

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Good morning Ms. Arntzen,  
I saw something that was quite worrisome today and I wanted to take the time to reach out and offer to have a conversation with you. I am a school counselor in Belgrade, MT. We have well over 400 students at each of

our 3 elementary schools here in Belgrade. We currently have a full-time school counselor for each school and I bounce to each school a day a week ( and a little more at .667 time). As a school counselor we implement a school counseling program to our school that includes classroom lessons, small groups and individual counseling time, not to mention all the other things school personnel do on a regular basis. As school counselors we do our best to meet the needs of children in the social/emotional domain, career domain and educational domain. Our job is to try to help eliminate barriers to learning. Now more than ever, we are seeing the social and emotional needs of children being a barrier to learning. How do we not only educate the children with social emotional needs, but the rest of our "regular ed" kids when there is such a high need for social and emotional support? In Belgrade we have a life skills program at one of the elementary schools as well as an emotionally disturbed behavior program at another one of our schools. While our job is to educate all children, these programs provide an extra layer that we have to take into consideration when we look at the education of all our students. Our Montana ratio of 400 to 1 students to school counselors already makes it very difficult to serve all the students in our school. When I think about having a higher ratio that means that we would be in crisis mode, seeing the students in crisis and not being able to serve all students through delivering a comprehensive school counseling program. That National School Counselor Association recommends a ratio of 1 to 250 in order to be able to adequately do our job. I see that it is so difficult to be in education during these times when teachers and staff have to deal with so much behavior that the job of educating children in academia is increasingly difficult. I am more than open to having a discussion about the role of a school counselor and what we do in the schools. My personal number is or I would be open to meeting in person if you have any questions. Thank you for your time.

Respectfully,  
Andrea Bermingham  
School Counselor  
Belgrade Elementary Schools

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Dear Elsie,  
I totally understand that our schools are strapped for money. But, please don't take away our school counselors and librarians. They provide so much benefit for our schools.

I work at a Billings elementary school and see the amazing influence of both of these people in our own school. We couldn't function without either of them, especially our school counselor. Please find another way to save money.

Perhaps, we can do away with field trips and out of town sports. The travel costs and payment of staff would save a large amount of money.

Cut staff at the District level. I see so many District people come in and out of our school that don't seem to make a huge difference. Their jobs are highly sought after because they work for the district, get all the benefits, but don't really work much with the kids. They make high salaries, but their "feel good" programs are highly overrated. Surely there are other ways to save money.

Sincerely,  
Karen Yose

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Elsie,  
Please reevaluate your support of the proposals to cut funding for librarians and counselors for schools and work to maintain ratios of librarians and counselors. In fact, work needs to be done to increase the ratios. Our students are in need of both of these services and more than ever it is the only access some of our students have to the services. It is a valuable part of education.

Ensuring equity in our school systems should be a priority in your work.  
Please reevaluate your support of these proposals.

Sincerely,  
Breann Streck

Park City Schools.

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Hello Tristan

I am writing in Support of Maintaining Librarian and Counselor Ratios.

I am against Superintendent Arntzen's proposed changes.

We must maintain full access to art, music, voice, science, social studies, mental health and career academics.

Best regards

Molly Bradford

Missoula, MT

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Good afternoon. As a Bozeman citizen and Montana State University alumna, I implore you to keep the librarian-to-student and counselor-to-student ratio requirements for as many schools as possible. I understand that many rural schools cannot maintain this, but please allow them an exception - do NOT make this a rule.

I had deep, impactful relationships with the libraries and mental health facilities at MSU while I was a student. I worked for the MSU Library through the work study program for three years, and I quickly learned how integral libraries and their faculty and staff are to a thriving and knowledgeable student body. The multitude of resources and materials, as well as research assistance, were vital to my success, and on a personal note, my time spent at the library were some of the most stress-free and liberating during what could sometimes be a difficult semester or school year. The library and its wonderful staff were like a second family, and I am so grateful for their role in my education. I'm sure thousands of students and community members could say the same.

Because of those difficult semesters, I had a mental breakdown during my sophomore year that led me to school's health facilities and a kind, patient counselor who helped me work through my stressors and guided me on a path to being a better student and community member. But even then, mental health resources were stretched thin, and I was lucky to get an emergency consultation when I needed one. You would know better than anyone how stressful and demanding schooling of any level can be, and cutting necessary mental health staff will lead to a decrease in performance, an increase in dropouts, and a decrease in the overall health and happiness of the student body.

Now more than ever, librarians and counselors are some of the most critical members of a school's staff. They provide that essential assistance, attention, and compassion that is so important for young members of our society to have in this chaotic time of their lives. They are a human face to what can often be perceived as a cold, academic world.

Please dismiss the call to remove librarian/counselor ratios in schools.

Thank you.

Aubrey LaBarre

She/Her/Hers

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To the Negotiated Rules Making Committee:

I write to oppose Superintendent Arntzen's proposed changes to the Chapter 55 ratio of librarians to students in Montana schools.

School librarians help foster excellence in education for students across varying backgrounds and needs. Maintaining the ratio - is the wisest, healthiest, and most supportive decision for our cherished students.

Local control in education is significant, but if school librarians are eliminated, it basically eliminates the library!

Libraries, and librarians, are lifesavers for many students—me included. In Great Falls Public Schools in the 1950s and 1960s, my librarians soon knew how much I liked "current events"—starting in grade school—and helped me find resources to nurture that passion.

Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,

Robin Biffle

Helena, Montana, 59601, United States

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Good afternoon Tristen,

I feel it's important to keep the current ratio of school counselors and librarians.

My daughter is a kindergartner in the Bozeman School District and some of the kids with major behavioral issues see the counselors regularly and have to be monitored by the counselors to keep other kids (including my daughter safe.)

Thanks for listening,

Mary Bentley

Bozeman MT 59718

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To whom it may concern:

I would like to share with you a situation that occurred with our family.


If you do not maintain the current ratio (which is already a strain on the current staff) we will have bigger problems. These counselors may have to split time between 3-4 schools vs 2 schools (each approximately 400 students) that they currently have assigned to them

They are already stretched thin on Children's individual needs but also the schools needs. Our teachers and principals are not trained. In my situation teacher and principal meet with me and discussed behavior and talking positive to my daughter until she could be seen by licensed counselor however, they are not trained and simply doing the best they can.

If we do not maintain the current ratio, we will have bigger issues with students mental health, well being and possible more suicidal thoughts, attempts or worse yet completion in the attempt. In fact, We need more Counselors to help support our youth. We need to build them up when they are struggling, provide them with

the tools to maintain healthy boundaries and skills to become successful citizens in our community as they become adults.

The current ratio already stretches Counselors to meet the needs of our youth. Not maintaining the ratio, at minimum, will only harm us not help our children and young adults.

Please consider maintaining the current ratio on counselor per students in Montana.

Melissa Sider  
Billings, MT 59106

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Dear Tristen-

I am writing to oppose the recommendations made by superintendent Arntzen to the Negotiated Rulemaking Committee. Eliminating the librarian and counselor ratios for students will have a devastating impact on our school children, particularly our rural students. Superintendent Arntzen's recommendations gut current accreditation standards and will lower education standards and the quality of a rounded education for all Montana students.

Reducing or losing access to counselors and librarians, as well as art and career electives will greatly reduce our students' educational experience and quality of education, and their future. I strongly encourage you to reject Superintendent Arntzen's recommendations.

Sincerely,  
Elisa Fiaschetti  
Helena

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Dear Tristan

I am an educator and I have seen first had the impact our school Librarians and Counselors have on our kids. Our kids are yearning for education surrounding their reading. My kids this year came in below grade level and have been truly impacted by the support and knowledge acquired through our librarians. They support us with the standards we are addressing in the classroom and more importantly help get books in our children's hands. I can't think of a greater way to impact our kids by giving them more access to reading materials and knowledge. This is a role that is so crucial in all our schools regardless of size. Size shouldn't change how much access kids get to their librarian.

In the area of counseling our kids need this resource more than ever. Montana is ranked second in the United States for Suicide. Our counselors play a significant role in our children's lives to being a listening ear and a support system that give our kids tools to help with any situations at home and or at school so they can be successful. This is a role that is needed in all schools full time not matter what size the school is. This needs to be apart of our kids upbringing.

In middle school some of the interests and passions that kids find come from the electives they choose in middle school. I can still remember the classes I took in middle school and they helped me decide what I may be interested in for a career. It also helped me know what I wasn't interested in but I appreciated the exposure. For most of our kids these classes are the highlight of their school careers. This is the fun that our kids get to explore and learn what is essential. Please don't remove these experiences from our kids they deserve all the opportunities they can get access to.

Sincerely,  
Katie Merritt  
Second Grade Teacher

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I am disappointed that our Superintendent of public instruction would recommend eliminating ratios of students to librarians and counselors and eliminating exploratory classes for middle school students!

All the above are integral to the well-being of students AND the overarching pursuit of education. Eliminating or reducing their presence in schools is a major step backwards... Do we really want Monana students to join ranks with many southern states?

Exploration of new skills, literacy, art, social skills, self-advocacy, are imperative to the functioning of school and the creation of a well-rounded student. These students are our future, and a Free Public Education is the backbone of our democratic society.

Please seek an alternative solution to the elimination of classes and programs that help keep kids in school.

Sincerely,

Susan Sielbach

Jefferson Elementary School Librarian

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Montana Office of Public Instruction:

I oppose the proposed plan to reduce the number of counselors and librarians in schools. I point to the fact that OPI has demonstrated that it is unable to manage its own duties with its reduced staff that has resulted from poor management at OPI. Since OPI is unable to meet its own obligations to staff, schools, teachers, families, and students in public schools across Montana, this plan seeks (in my mind) to expand and spread that ineptitude and management style like a covid-19 pandemic.

I recall that the Superintendent has been participating in anti-education forums and discussions around the state, has promoted privilege over equity, and even spoke at one event in which violence against school administrators and board members was suggested and encouraged. This form of educational leadership is clearly aimed at undermining public education in the state . . . and in many cases it seems to be working. But I am pro-education, I am pro-community participation, I am pro-inclusion, and I am pro-healthy-children. Since this proposal to reduce counselors and librarians in the schools seems to meet none of those goals, I adamantly oppose it.

Hal Schmid, Ed.D.  
Arlee, Montana

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Hello,

I am writing to express my opposition to Superintendent Arntzen's recommendation to eliminate staffing ratios. I also am deeply opposed to her recommendation to eliminate elective and credit requirements at the middle school level. This seems counterintuitive to our Governor's goal of bringing home native Montanans. Why would they want to come back if our public school system is meeting lower standards than other state public school systems? How do we attract businesses if Arntzen seems determined to weaken our public school system. I'm not sure what her agenda is but it seems to be at odds with our Governor's goal of attracting businesses to Montana. Businesses want to relocate to states with strong public institutions, especially strong schools, so they can recruit strong employees.

**Emily K. Mason**

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Tristen,

I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed today (May 18, 2022) by OPI.

As a public health professional, I work to support persons with behavioral health conditions (including youth) and young people in Montana are in a mental health crisis. 20% of high school students seriously considered attempting suicide last year and 41% reported having symptoms consistent with depression (Youth Risk Behavior Survey, 2021).

Reducing access to mental health services will have dire impacts on Montana students, especially those who are most vulnerable and cannot access these services otherwise.

Additionally, the rules eliminating requirements for librarians and gutting elective requirements for middle schools will drastically lower the quality of education throughout the state.

As a parent of three children in the public school system, **I ask that you please maintain the current language and standards.**

Respectfully,  
Lisa Richidt

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Dear Superintendent of Public Instruction Elsie Arntzen:

I am writing to express **my opposition** to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). And the problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone.

To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students in our state. I cannot state more emphatically how this rule change will impact the most vulnerable students attending the schools in our state with the least resources. Youth with suicidal ideation, Severe Emotional Disturbance and other complex behavioral health needs will suffer when schools are no longer to have counselors on site or maintain what are already paltry levels of service and staffing.

**Please reconsider. This proposed change will, indeed, harm students and impact families and our communities.**

In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state—particularly in low income and tribal areas. Please maintain the current language and standards for the good of all students.

Thank you,  
Stephanie Burkholder  
Helena, MT

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Superintendent Arntzen, members of the committee, and others to whom it may concern:

I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am the mother of an incoming Kindergartner in Helena Public Schools, and we have been so encouraged by the amount of support currently available to students in our local school. It is clear that every teacher and staff member goes above and beyond to make sure each child receives the support they need. That said, class sizes are already large and growing schools make it difficult to address the unique and complex needs of every child.

At our recent parent orientation, hearing from the school counselor and other resource staff went a long way toward relieving our anxieties about the transition to Kindergarten. Our child is developmentally on-track and comes from a secure home with the support of family and friends; we recognize that many children in Montana, especially those from lower-income families or tribal areas, are not as fortunate. School counselors and librarians are just one crucial piece of the puzzle that ensures all children are supported, their individual and often complex needs are addressed, and they are able to thrive.

Eliminating the required ratios for school counselors in Montana schools at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students. Eliminating requirements for employee librarians and gutting elective requirements for middle school students will also lower the quality and breadth of education for all children, especially the most vulnerable. Please maintain the current language and standards for the good of all students.

Respectfully,  
Caitlin & Rainier Butler  
Helena, MT

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Dear Members of the Chapter 55 Negotiated Rule Making Committee,  
I'm writing to voice my opposition to a number of the proposed changes under consideration in your meeting today. I am a parent of two young children who will be entering into the Helena public school system.

I believe that mandated ratios for Librarians and Counselors ensure a certain level of access to critical services that our kids need. Rather than removing these ratios, I urge you to consider further reducing the ratios to align with national standards. Flexibility within local school contexts is appropriate for some matters, but not for the critical needs and sometimes life-saving services that Librarians and Counselors provide. Please do not accept these changes as proposed.

I also oppose the removal of specific arts elective offerings in middle schools, and note that the High School curriculum specifies 2 units of arts electives, whereas no parallel has been provided in the proposed changes for middle school students. Arts are a critical part of any education, and vital not only on their own merit but also for how they benefit wide ranging educational goals. Please consider, among myriad studies on the benefits of arts, this finding:

*"We find that a substantial increase in arts educational experiences has remarkable impacts on students' academic, social, and emotional outcomes. Relative to students assigned to the control group, treatment school students experienced a 3.6 percentage point reduction in disciplinary infractions, an improvement of 13 percent of a standard deviation in standardized writing scores, and an increase of 8 percent of a standard deviation in their compassion for others." - <https://www.brookings.edu/blog/brown-center-chalkboard/2019/02/12/new-evidence-of-the-benefits-of-arts-education/> [brookings.edu]*

Thank you for your consideration.  
Sincerely,  
Jeremy Osborn

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This email is to express in no uncertain terms my wholehearted opposition to Superintendent Artnzen's proposed recommendations.

Superintendent Artnzen's proposed recommendations for the elimination of ratios for counseling and library services endangers students in rural communities both educationally and emotionally. Further, eliminating the requirement for programs in science, music, visual arts, career education, and languages in the junior high grades will result in students entering high school unprepared to pursue similar subjects in high school. In turn, this will disadvantage Montana students for being accepted into accredited colleges and universities.

Implementation of the Superintendent's proposed changes would cheat students of the educational benefits of a broad and integrated curriculum and support for their emotional wellbeing and literacy. I strongly oppose these changes which will reduce opportunities for our students to become well-rounded citizens and increase the rural-urban divide.

Superintendent Artnzen's proposed recommendations are effectively telling Montanans that their children - their future - do not matter as much as a short term bottom line brought about by ineffective and, frankly embarrassing mishandling of her position.

~Aliselina Strong

Helena MT

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I'm Kiersten Iwai, the Executive Director of Forward Montana. We are a civic engagement organization that works with young people across the state, including high school students.

High school students in Montana have so much to give to our communities. Unfortunately, isolation, lack of access to resources, and factors out of our control have led to a mental health crisis among students. Over the last couple years, there has been a significant increase in students' mental health challenges, including an increase in suicidality, depression, and anxiety. This can lead to school truancy and poor academic achievement. which will ultimately impact their future outcomes.

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. Eliminating the ratio would eliminate access to mental health, especially for rural areas. Students need more school counselors and resources for mental health support, not less. The ratio guarantees that all students, no matter where they live in Montana, have access to school counselors and the support they need.

Thank you for your consideration,

Kiersten

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Hello!

Please add the following to the public comment section for chapter 55 school quality task force proposal:

To whom it may concern,

I am writing to strongly express my deep concerns about the proposal to lower ratios of school counselors and librarians within Montana schools.

I see every day in the school I work at the increasing mental health needs of students, especially since the COVID-19 pandemic began. I worry greatly about the current capacity of the schools to meet these needs, even with increased support through programs like CSCT.

If the ratio gets lowered, I fear we will continue to see increases in depression, anxiety, self-harm, and suicide from already high levels.

If issues like these are left unnoticed and untreated, it creates a ripple effect of increased strain on parents/guardians leading to missed work and increased need on social safety programs, increased demands

on our hospitals and crisis centers, increased use of criminal justice pathways for youth, along with increased economic impacts at all levels.

Lowering the need for professional staff (i.e. school counselors) to address is unacceptable in my opinion and will lead to greater problems that will take longer to address than the preventative measures that can be taken by school counselors today.

I welcome any further questions or comments about this objection.

Brenda Stephani, LCPC

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*"There is something about the outside of a horse that is good for the inside of a man"-Winston S. Churchill*

Brenda Stephani, MS, LCPC L'esprit | CSCT Supervisor & Therapist

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I grew up in rural schools with no access to mental health. I had 3 friends attempt suicide.

I am now a working mother in bozeman with a child who has physical disabilities. He needs access to counselors.

Melissa Hoaglund

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Negotiated Rule Making Committee,

Thank you for your support for children not only academically, but also mentally, socially, and emotionally.

Montana ranks third in the country in death by suicide and twice as many as the national average for children ages 10-17. This is not the time to pull resources.

**Please maintain the ratio limitations for counselors and librarians.**

Thanks so much for your consideration.

Alex Brown

Concerned Parent

---

Greetings,

Please maintain the current librarian and counselor ratios for Montana schools.

It is of such high importance to consider the mental health of our school children. Counselors are such an integral part of the school systems. If our kids have any chance of not having all the mental health issues that the older generations do, we need to give them far more support early in life. School is the perfect place to teach kids social skills and appropriate ways to cope, but need to be taught by people trained to do so, ie counselors. Kids need to have easy access to counselors.

Children also need to have their curiosity cultivated by books, all kinds of books. They should be taught to embrace books and know how to use them. Our society depends on their little minds absorbing as much as possible if we ever hope to progress. Librarians are the resources we need to teach this important lesson to our children.

A concerned citizen,

Christina Van Dyk

Helena, Montana

PLEASE maintain or increase current librarian and counselor ratios in Montana public schools. These threatened cuts come amidst a [national struggle in youth mental health \[thehill.com\]](#). Montana families are living this struggle. As described by the [Independent Record \[helenair.com\]](#), the 2020 Youth Risk Behavior Survey for Montana "found the highest rate of students ever to report feeling so sad or hopeless for two or more weeks in a row that they stopped doing usual activities, a metric researchers say is a symptom of depression."

I urge you to reject the proposed changes.

Thank you,  
Heidi Barrett  
Livingston, MT 59047

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. As a mental health provider in Montana, this recommendation is irresponsible and deeply uninformed. At a time when youth are experiencing a mental health crisis, there should be anything but decreased ratios in school. The child mental health communities are seeing unprecedented numbers of children experiencing anxiety, depression, and suicidal thoughts, and Montana's health care providers, let alone the country's, simply are not equipped to meet this demand. The American Academy of Pediatrics (AAP), the American Academy of Child and Adolescent Psychiatrists (AACAP), and the National Alliance on Mental Illness (NAMI) all advocate for increased mental health in our schools to address the national mental health emergency in children and teens.

We desperately need more funding for mental health services, not less, particularly in a state like Montana. Not to mention that this recommendation unfairly targets rural youth who have less access to mental health support already, and are a greater risk for suicide. Between 2007 and 2019, adolescent depression and suicidality increased 60%. School counselors provide access to mental health services and support. School counselors build relationships between students and their families and communities. School counselors are often the first line of defense in identifying and addressing social-emotional needs of students. Schools are a place for prevention. Youth need more support now than ever before.

Please maintain the School Counseling ratios.

Sincerely,  
Joanna  
**Joanna Townsend | LCSW**

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Hello! I have become aware that Superintendent Elsie Arntzen is proposing ending staff/student ratio requirements for library and counseling staff in schools. This is extremely concerning to me. All of Montana's students deserve equal access to library services and counseling services. It is shocking that those is a place of influence over young people's education would be considering reducing access to mental health services and support as well as reading resources. Please do not reduce staff ratios or support for our students.

Thank you,  
Jennifer Rudolph

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mom of two public school students at Clancy School: a 5th grader and a 7th Grader.

I am lucky enough to have 2 school counselors in my family -- my sister and my mother-in-law (now retired). I am grateful for the work they do.

Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). And the problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone.

To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students in our state. I cannot state more emphatically how this rule change will impact the most vulnerable students attending the schools in our state with the least resources. Youth with suicidal ideation, Severe Emotional Disturbance and other complex behavioral health needs will suffer when schools are no longer to have counselors on site or maintain what are already paltry levels of service and staffing. Please reconsider.

In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state-particularly in low income and tribal areas. Please maintain the current language and standards for the good of all students.

Sincerely,  
Renata Strauss  
Clancy, MT Resident

---

Please do not remove school counseling and library services

Please do not accept the sweeping "out of nowhere" changes Elsie Arntzen is proposing to school accreditation standards. The elimination of programmatic electives is inappropriate and unnecessary. It is unconscionable that these changes would be considered or go through.

Thanks, Katja Elias in Helena Montana

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Dear Mr. Loveridge,  
Please let the Negotiated Rule Making Committee know that Montana teachers, parents and students want to maintain the librarian and counselor ratios in our schools.

We know that quality schools offer librarian and counselor support. Taking away the ratios would hurt our rural students. All students deserve to be served by a certified librarian and certified counselors.

Thank you!

**Susan Erickson, M.S.**  
**Librarian/Information Specialist**  
**Polson High School**

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To whom it may concern,  
It has come to my attention that there is a vote coming up that could negatively impact our school systems. As a mother and substitute teacher in Billings School district 2, I am strongly against eliminating the student staff ratios for counselors and librarians. While working and volunteering in the schools I have seen firsthand how vital these services are to our children. Even before the pandemic our school counselors' days were full helping kids. Since the pandemic their role in our schools has become even more vital! Not only do the counselors help teach the kids how to manage their emotions, solve conflict and other life skills, which seem to be lacking at homes more and more these days, but they are also a big line of defense against child abuse/neglect. The teachers are already stretched thin and adding on more responsibilities would, on my

opinion, only lead to more teachers leaving their profession, which they already seem to be leaving at an alarming rate.

Our school systems need more help not less. Please do not let this pass. This is the future of Montana that will be affected by this decision.

Thank you for your time.

Sincerely,  
Casey Roth

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The importance of mental health support in schools is PARAMOUNT! As a recently retired teacher of 26 years, I implore you- do not decrease mental health services for the youth trying to achieve academically. Until all needs are met, academic growth will not happen. Please do not accept the recommendation of Superintendent Elsie Arntzen.

---

Hello

This is an incredible disservice to students. Montana already has record high student suicide rates and students who don't reach for a higher education. Cancelling these services is deplorable. Arntzen should quit pandering to voucher/privatization of schools, she works for all of Montana not just the rich and healthy.

Thank you,  
Kimberly Kreider  
Arntzen is proposing elimination of ratio rules for school librarians and school counselors-eliminating guaranteed access to these services.  
Kimberly Reider

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As a school counselor for the last 23 years, there is no more important time for counselors to be in our schools than the last 2 1/2 years. I have witnessed the increased stress that our students have experienced with the pandemic and also our changing world. I have also seen a dramatic increase in anxiety, depression and social difficulties that our students face. Students are unable to focus on academics when their basic emotional needs are not being met. It would be an incredible mistake to decrease the number of counselors in our schools, and take away the appropriate ratio of counselors in our schools. Not only would the student's emotional well being be at stake, but their academic skills as well. This proposal will do irreparable harm to our students and our society as a whole. I urge you in the strongest way to keep the ratio of 1 counselor per 400 students in our schools. Our children's future depends upon it.

respectfully,  
Jill Lea  
School Counselor/Psychologist

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Good morning,

My name is Amanda Muri and I am currently a special education teacher for students that are labeled Emotionally Disturbed. I also work with students on the Autism Spectrum and other abilities that impact mental health. As an educator, I am appalled at Elsie's proposal to limit counseling services. Within the last two years, things have become more prominent in the mental health community and our students are becoming higher needs when it entails counseling. This has become so prominent, that I have even considered going back to school to get my counseling degree at the doctoral level, so that I am able to meet their needs. Suicide is one of the highest death rates in Montana, and always has been. I believe that taking away counseling from the school atmosphere will hinder any and all possible stops of this sort of action. Students as young as 3rd grade are now looking at suicide as a coping skill, and this in itself.

As a person who suffers from a mental health crisis myself, my counselors have been the ones to save me in the past. Please don't take away these life saving people from our students.

Mandy Muri  
Will James Middle School  
Special Education

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Please share my concerns with the committee reviewing these proposed changes from Superintendent Arntzens.

10.55. 709 and 20.55.710

As a retired elementary teacher of 35 years, I know the importance of having a fully functioning and staffed library . Montana's state standards include curriculum that is taught during library classes. Our school libraries are a connection to a multitude of resources reaching outside the physical space of a school building. Libraries offer an educational setting outside the classroom and a certified librarian is an incredible resource for teachers and students,

With all the mental health issues facing students in our nation and state, I'm shocked that there would be a proposal to cut requirements to provide counseling services. These services should be increased during the current crisis, not diminished! The numbers, 1:400 students, is certainly not adequate for a healthy school environment.

Please dismiss these proposed changes and keep the excellent standards we require in our public schools.  
Denise Manning  
Whitefish

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To the Negotiated Rules Making Committee and Board of Public Education:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Our goal as educators is student success. There have been countless studies that show having access to Library Media services is measurably beneficial to student academic achievement.

<https://www.ala.org/ala/aasl/aaslprotools/resourceguides/studentachievement.htm> [ala.org] It is vital for students and teachers to have appropriate access to information and materials from the school library to achieve learning that can best be facilitated by a Library Media Specialist.

Yours sincerely,  
Peggy Racicot  
Teacher Librarian  
Hellgate Middle School

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I am astonished and appalled by the proposed changes. One of the changes would cut the counseling programs at most schools to a dangerous level. Right now, there are ratios in place to ensure that kids have access to school counselors. Elsie's proposal would eliminate this ratio. This would mean that there would be no requirement whatsoever as to how many counselors each school district would need. The school district would have the option of using "a consortium, multidistrict agreement, or interlocal cooperative to secure these services." This is absurd.

This proposal, in a state where access to mental health care is damn near impossible, in a state that consistently ranks in the TOP FIVE for deaths by suicide, is dangerous, extremely dangerous.

Why are there proposals to cut the arts? Cutting library services? These are unacceptable- cutting programs that foster self esteem and independence does not seem like a good idea. It will not produce quality education. I urge the committee to reject these proposed changes, as they will only weaken public education and produce students unsuited to be responsible, educated adults.

Thanks you.

Julie Watersbarcomb

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To whom it may concern,  
I recently became aware that the superintendent of Helena schools is proposing cuts to arts, changing grad requirements, and eliminating counselor and librarian ratios. I'm writing to urge you to NOT make these changes. All these components ensure the development and health of these students and they deserve these resources.

Thank you,  
Sophia Nelson, a concerned Helena resident

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**PLEASE DO THE RIGHT THING! KEEP OUR SCHOOL LIBRARIES AND COUNSELORS (not enough as it is) IN TACT.**

I was lucky enough to spend time in one of our middle-school libraries recently. I was moved to see so many students using the facility. Some came for discovery and studies, some came for solace, some came for a feeling of safety and belonging, and some came to spend time in the "mindfulness area" a place to catch their breath and slow their thoughts. Whatever the reason, they chose the library!

I understand the funding is tight, but times are hard for many families and children in our district. Please think about how important the limited amount of time they have with a counselor is. For some it is the only connection to mental health and emergency help they have.

Getting our public schools is not the answer to better education!!!

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To whom it may concern,  
I was informed this was the proper email for comments in regards to the proposed counseling changes. I agree that there need to be changes, those changes should include a ratio no greater than 250 students per counselor. The proposed changes are reckless at best. We have just gone through three years of Covid uncertainty, which has resulted in a dramatic increase in the number of children and adults needing mental health services. Educators and administrators are retiring in record numbers. We need counselors more now than anytime I've seen in my career as an educator. So, yes, please change the rules to reduce the case load, not increase it. 250 to one is the recommendation of the American School Counseling Association, I suggest we follow that recommendation and possibly look into having LCPC's on staff as well.

Thank you,  
*Mike Schnittgen*  
*K-8 School Counselor*  
*Townsend Schools*

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Hi Tristen,

I just saw the proposed changes to counseling staff assignments. As the parent of a kindergartener in Helena, I am very concerned by the shift from "staff" to "program." School counselors are essential in schools where they can support children. Helena students are struggling as is with mental health. I do not believe this proposed change will result in adequate support for them. Actually, it appears to be an attempt to reduce critical staff.

<u>10.55.710</u>	ASSIGNMENT OF SCHOOL COUNSELING STAFF	<u>10.55.710</u>	ASSIGNMENT OF SCHOOL COUNSELING STAFF
	<p>(1) A minimum equivalent of one full-time counselor for each 400 elementary (K-8) students shall be provided. The counselor/student ratio shall be prorated.</p> <p>(2) A minimum equivalent of one full-time counselor for each 400 high school students (including grades 7 and 8 if high school funding is received) shall be provided. The counselor/student ratio shall be prorated.</p> <p>(3) Districts with fewer than 126 students may employ or contract with a licensed, endorsed school counselor or Class 6 specialist or utilize a consortium, multidistrict agreement, or interlocal cooperative to secure these services</p> <p><b>History:</b> <u>20-2-114</u>, MCA; <u>IMP 20-2-121</u>, MCA; <u>NEW</u>, 1989 MAR p. 342, Eff. 7/1/89; <u>AMD</u>, 2000 MAR p. 3340, Eff. 12/8/00; <u>AMD</u>, 2002 MAR p. 3309, Eff. 11/28/02; <u>AMD</u>, 2012 MAR p. 2042, Eff. 7/1/13.</p>		<p>1. <u>Each school system must provide a school counseling program for (P-12) students through an endorsed school counselor or Class 6 specialist by:</u></p> <ul style="list-style-type: none"><li>a. <u>employing an endorsed school counselor or Class 6 specialist; or</u></li><li>b. <u>contracting an endorsed school counselor or Class 6 specialist; or</u></li><li>c. <u>(1) A minimum equivalent of one full time counselor for each 400 elementary (K-8) students shall be provided. The counselor/student ratio shall be prorated.</u></li><li><u>(2) A minimum equivalent of one full time counselor for each 400 high school students (including grades 7 and 8 if high school funding is received) shall be provided. The counselor/student ratio shall be prorated.</u></li><li><u>(3) Districts with fewer than 126 students may employ or contract with a licensed, endorsed school counselor or Class 6 specialist or utilize utilizing a consortium, multidistrict agreement, or interlocal cooperative to secure</u></li></ul>

Best regards,  
Bridget

Bridget Williams

Hello,  
I am writing to urge Elsie Arntzen not to change the requirements for counselors and librarians in Montana schools. I moved to Montana during the 2nd grade and went through school here. I may not have made it through middle and high school without access to these essential and amazing people.

helped me not only expand my reading horizons, but were another listening ear.

Many families can not afford private therapy. A school counselor may be their only resource. Counselors also play the important role of being available for students who are being abused at school or home. Speaking out and asking for help takes immense amounts of courage. If a counselor isn't available when a student is ready to talk, they may not try again.

Please do not make changes to a system that literally saves lives. With all of the recent focus on protecting children it is unimaginable that these changes are even being proposed.

Thank you,

Sadie Viergutz

Supervisor of Sterile Processing at St. Patrick's Hospital.

I am a certified Health Enhancement and Science teacher at Hamilton High School. I am **terrified** to hear of your recommendation to decrease the number of librarians and counselors in our schools.

As an eyewitness and a veteran teacher of 33 years I can tell you with 100% confidence that this is the time when it is crucial to increase the number of school counselors and social workers in schools rather than decrease the number! Did OPI overlook the fact that the **teen suicide rate in Montana is the third highest in the country? (CDC 2020)** I have never seen the mental health of our Montana kids in such a fragile state. Having more school counselors is one of the most effective ways to help prevent teen suicide. The lunacy that is proposed by OPI will have the opposite, devastating effect!

As far as **school librarians** are concerned, we also need to **increase** our standard rather than decrease it. Again, as a veteran teacher I have seen thousands of students being guided by certified librarians to gain crucial research skills. Probably the most important skill that a librarian teaches is how to critically use information and how to spot misinformation. **Why would OPI think that in 2022 when there is a poisonous scourge of misinformation that this would be the best time to decrease the number of librarians in schools???** What a huge disservice to Montana kids and our Montana communities!

Eliminate the proposals to decrease school counselors and librarian if you believe in preserving the safety and wellbeing of our Montana kids.

Sincerely,

Marie Antonioli

Health Enhancement/Science Teacher

Hamilton High School

I am writing to you to vocalize my disapproval of the proposed changes to the State of Montana education programs and requirements that are being brought to the Negotiated Rule Making Committee by Superintendent, Elsie Arntzen. The proposed changes may benefit an undisclosed financial target for a reduction in budget, but a wholesale removal of both the language included in Montana Common Core Standards, ARM Title 10, chapter 53 along with the removal of program requirements will cause harm to the futures of Montana's youth.

If you would explanation for the why's of this harm please let me know as I will be very happy to go into detail. I will say that I am a born and raised 5th generation Montanan who has seen the challenges our children encounter and removing structure from our education will only exacerbate the problems.

Thank you for your time.

- Josiah M. Hodge

Missoula, Mt 59808

My name is Sean Morrison and I am a principal in Helena Public Schools. I currently serve at Four Georgians Elementary School and I've been a school and district administrator for 13 year in Montana and Illinois.

I am shocked that Superintendent Arntzen's has proposed changes to 10.55.709. The staffing of our school libraries is so important for the future of Montana. The ratios in 10.55.709 ensure that we are able to remain in alignment with the recently updated Montana Content Standards for Library Media and Information Literacy. And as we recover from a pandemic, student are, now more than ever, in need of literacy support!

Montana's students deserve to have a school librarian. The school library is a place where we teach students to be good digital citizens, to approach information critically, to problem solve, to consider accuracy, bias, and relevance.

We must ensure that our school libraries are effectively staffed; eliminating the ratios in 10.55.709 will undoubtedly have a devastating effect on Montana's students.

Respectfully,  
Sean Morrison  
Sean Morrison  
Four Georgians Principal  
Helena Public Schools

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Hello!

I think I am late, but I wanted to make sure to try to get my comment in.

Superintendent Arntzen does not care about kids. Her recommendation to remove the requirement of 1 school counselor per every 400 students is absolutely appalling and downright irresponsible.

I am a licensed clinical social worker who is witnessing our failing mental health system completely strained and nearly splintered by the weight of the pandemic over the last several years, and we are especially seeing this among kids. We thought access to mental health was bad before the pandemic. We had no idea it could be this bad. Kids are behind in their social and academic skills and are STRUGGLING.

Several of the MSW students I taught this past year were completing practicums in schools and witnessed countless kids in crisis. Teachers and administrators reported to me that schools are experiencing more behavioral issues than ever before. These kids need support and adequate mental health access. In addition, decisions like these are going to disproportionately affect children in rural areas, children of color, and other children belonging to marginalized groups.

Furthermore, this type of decision takes away support from our teachers who are barely hanging on. Many have called it quits because it has gotten too hard and are shockingly, horrendously underpaid. Teachers need mental health supports in their schools so they can do their ACTUAL jobs of teaching our next generation.

Her recommendation to remove this requirement perfectly illustrates that Arntzen is an embarrassment to her role and does not deserve to represent education in our state. She only cares about the bottom line. Decisions like this should result in her being removed from her position.

Thank you,  
Amy Allison Thompson, LCSW

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To Whom This May Concern,

I am a public school educator. I have taught first grade for three years. I cannot begin to tell you how important it is to have counseling available and ready for our students, as well as the library teacher. I utilize the counselor multiple times throughout the day to help my students. Having a counselor readily available is

something that is needed in this day and age for students. Our students, as well as staff, constantly utilize our Librarian for help, as well as the library and the resources it has.

After the impact COVID has had on teachers and staff, I cannot fathom someone taking away the support we need through our counseling system. Increasing the ratio from students to counselors is sincerely disappointing and honestly very offending. We as educators and staff, are the ones showing up every single day to be with these students and by not having that consistent and readily available support that we have through our counseling system, would be extremely detrimental to the students as well as staff.

I hope you take this email, and the plenty of others that I am sure you will receive, into serious consideration. Montana needs to step it up for teachers and the staff who are building our children's foundation!  
Holly Davison

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Dear Chapter 55- Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the school counselor to student ratio. I grew up in Montana, and am currently work as an RN in Bozeman, and am studying to become a Psychiatric Mental Health Nurse Practitioner, (PMHNP). I have seen first hand how important the role of school counselor is. They help to intervene in cases of abuse. They notice red flags that could be indicators of violence to oneself or others. They advocate for additional academic support. They act as a positive, trustworthy adult, when there may not be other positive role models.

I strongly believe that the counselor to student ratio should remain within the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. I have seen a marked increase in the mental health challenges faced by our youth. We should be doing all we can to meet the mental health needs of Montana's youth to help ensure their successful futures, rather than decreasing resources that are already spread thin. Please help to ensure access to mental health care, especially in rural areas by maintaining the current ratio.

Sincerely,  
Fraser Ball, RN, BSN

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To whom it may concern,

As an elementary school teacher and parent to two elementary aged kids, we CANNOT cut our counseling positions in schools! Mental health, career counseling, and counseling services are so important! We should be closing the gap in student to counselor ratio not widening it!!! You need to reconsider this idea. Since the pandemic, our students have more mental health challenges than ever. We NEED our full time counselor's support.

Brooke Knowles  
Great Falls Public Schools  
13 year teacher.

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Please maintain electives for middle school students, as well as much needed librarian and mental health/counselor positions in our schools. The world has drastically changed for all of us in the last couple of years. Teachers need support staff more than ever, as do the students and families they serve. Students need choice and to learn things languages and the arts to be better rounded, global citizens.

Denise Rutledge, M.Ed.  
Teacher of the Visually Impaired  
Montana School for the Deaf and the Blind

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I can't help but wonder, does the Youth Risk Behavior Survey from OPI mean nothing to Ms. Arntzen? Counselors are needed more than ever to help our kids gain those lifelong coping skills. Some counties in Montana have a devastating suicide problem. A lack of counselors certainly won't help address the issue.

I believe the need for librarians is also key to a child's education. Who else to best foster the love of learning than someone who makes reading fun and enjoyable. Having someone that can encourage the love and ability to learn about virtually anything. Someone who can direct children to their interests and support the imagination.

Please tell Ms. Atntzen we do not support this. We need our counselors and librarians!

Thank you,  
Corette Oller

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I'd like express my deep concern about Elsie Arntzen's removing ratios for librarians and counselors in Montana schools. What a dangerous move that would be for students in our great State. In a time when mental health is such a huge issue on so many fronts (addiction, homelessness, suicide etc.) why would we even consider, in any way, lessening the ratio of school counselors to students. It makes no sense. Please recommend that this change not happen.

Thank you.  
Debbie Schenk  
Bozeman, MT

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We keep hearing about how so many students in Montana are committing suicide and thinking about it and attempting it and everyone acts like its huge concern, then pulls the rug out from under them by doing things like this. Don't take away the only access many of them may have to a counselor. This may well be the only mental health help some kids get. Is it really worth a few bucks to do this? Why do our most vulnerable always take the hit?

Please re-think your position on this.  
Sheila Nelson

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Honorable Committee Members, For the record. My name is Randall Boehmer, Missoula Co resident and voter. I urge you to adhere and maintain proper student to Counselor ratios, in our public school system. The current ratio is approx 400 students per counselor. That needs to lower, as its unacceptable. Our Parole and Probation system has better ratios than this.

Randy Boehmer

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Hello Tristen Loveridge,  
PLEASE MAINTAIN THE LIBRARIAN AND COUNSELOR Ratios for our public schools. These numbers are critical for serving students adequately. Without guidance, the trend will be to stretch librarians and counselors too thin. As a current school counselor and school psychologist, mental health for our students is critical more than ever and without support to keep our ratios reasonable, students and families will not receive what they need to thrive academically and socially. I love my role in schools and when families cannot access outside resources, we are a critical source of support. However, we can only do so much if we are stretched thin. Not being able to do our job thoroughly and effectively creates significant stress and burnout, which then does not serve students. ASCA even recommends a smaller ratio of 1:250, at least keeping the ratio as is for school counselors should not be a huge ask.

Please help support this critical aspect of helping counselors help students and families. Please support librarians and the key resources in our schools to inspire and provide knowledge to generations to come.  
Nina Rice  
School Psychologist and School Counselor

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I'm writing to relay a comment to the negotiated rule making committee regarding school accreditation and functional staffing ratios for school counselors.

As a mom and a former school social worker, I'm disturbed by the proposal to eliminate functional staffing ratios for school counselors and librarians. I have seen firsthand the critical role counselors play in supporting students and teachers, and urge the committee to keep the existing ratios in place.

In my experience as a school based social worker, I supported students who suffered from eating disorders, who had suicidal thoughts or had attempted suicide or self-harm, and whose home lives were abusive. I have handed out snacks to kids who didn't get enough food at home and listened to stories that make me hug my daughter closer at night, because no child should have to survive what the children in my care often did. I have had to make hard calls to child protective services. And I've also seen success stories — including one young girl who finally told her mom about her self-harm and depression. She was so terrified to tell her, but I sat with her while she did, and together we made a plan to get her the support she needed.

I'm also married to a former middle school teacher, who for 12 years brought home stories of his middle school students and their challenges. He often relayed to me his great relief at being able to call down the hall for the trained counselor - Miss Wanda - to take over when he had reached the limits of his teacher training or was simply too overwhelmed with his responsibilities as a teacher to provide a student with the support he could tell they needed.

Without someone to talk to at school, many Montana students will suffer in silence. Many will go hungry. Many will hurt themselves or be hurt. And teachers will try to pick up the slack, but will burn out more quickly than they already do trying. Still more will make dangerous mistakes or miss signs, lacking the critical training and expertise that counselors bring. As we face rising challenges with youth mental health and already incredibly high rate of suicide in Montana, I urge the committee and Superintendent Arntzen to reconsider this dangerous proposal and keep the current ratios intact.

Thank you for your consideration.

Erin Willig  
(mom to Maeve)  
Missoula, MT 59802

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Good evening,

My name is Haransh Singh. I am a Helena native, a Capital High graduate and current law student. Please see my opinion of Superintendent Arntzen's recommendations in the body of this email:

I am emailing to express my concern as a member of the public about Superintendent Arntzen's proposed changes to Montana school policy. I am most concerned by the proposed changes to 10.55.709, Library Media Services, K-12 and 10.55.710, Assignment of Counseling Staff.

To begin with 10.55.709, I am deeply perturbed by the removal of the proposal's requirements of certain levels of FTE library staff based on school size, entirely. Library skills are imperative for children to learn to become better students. Removing requirements for FTE library staff will not only harm students' knowledge of library skills, but it will also harm job prospects for Montana librarians and remove a longstanding fixture of education unique to Montana that does not exist in all other states.

Next, 10.55.710 is an even more worrying proposal. The superintendent's proposal would remove the requirement for schools of any size to have FTE counselors, allowing for the simple contracting of a school counselor by a school, regardless of that school's student population. Having worked in the field of student mental health in Montana, I am aware that incidence of youth mental illness is increasing significantly with every decade. In the most recent Montana Youth Risk Behavior Survey, as the superintendent well knows, 23.4% of high school students expressed suicide ideation in the preceding 12 months. A further 41.4% of high school students exhibited symptoms of depression in the preceding 12 months. Montana's rate of suicide

ideation in its high school students is nearly 5 points higher than the national average of 18.8% (<https://www.cdc.gov/mmwr/volumes/69/su/su6901a6.htm> [cdc.gov]).

If we really care about our students, now is absolutely not the time to be lowering the standards for the type and amount of counselors to be available to a school. In fact, to do so would be unconscionable.

Best Regards.

Haransh Singh

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I recently learned that Superintendent Elsie Arntzen recommended significant changes to school accreditation standards. I am asking the committee to maintain the librarian and counselor ratios. Mental health issues are at an all time high and jeopardizing our youths ability to access counselors at school is a dangerous game to play.

Thank you,  
Rebecca Birket  
Lolo, MT

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Hello,

I work at the youth homes in Missoula, and I am pleading with you to please not cut the ratios for school counselors in Montana. The kids I work with desperately need these services to be successful in the public school systems. These individuals come from tough backgrounds, and even students with fewer issues should have access to wonderful school counselors that do so much for these populations.

These threatened cuts come amidst a national struggle in youth mental health. Montana families are living this struggle. As described by the Independent Record, the 2020 Youth Risk Behavior Survey for Montana “found the highest rate of students ever to report feeling so sad or hopeless for two or more weeks in a row that they stopped doing usual activities, a metric researchers say is a symptom of depression.”

Superintendent Arntzen’s recommendation eliminates the ratio and therefore makes it less likely that Montana youth will be able to access school counselors who have a functional caseload. This is a horrible time to make it harder for Montana kids to access a school counselor.

Please consider that the kid having a flashback to a traumatic event in class really does need someone who is a trained mental health professional. I work with these kids every day, and they would all if they could tell you how much they need these services and professionals. Thank you for your time.

Best,  
Isabella McShea

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I am writing you to ask that the current counselor ratios in public schools be maintained. I cannot believe that Montana would even consider decreasing any mental health services to children after what we’ve all been through these last few years. Kids are really, really struggling and to cut services now makes no sense. Stop trying to save a few bucks by throwing our kids under the bus.

Thank you,  
Betsy

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As a teacher in a rural school I find this incredibly sad that we are going to cut programs and services to students in rural areas. I am a teacher that left the public business sector to come to work in our rural school. While there are many issues cutting services and licensing is going to hurt our public education system and grow home schooling. Please do better when it comes to making cuts and stop hurting public education and making it easier and easier for families in rural areas to chose private education.

Lindsey Williams

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need.

I have 2 teenage daughters who come from a stable home and I see how much the school counselors help even them. The kids who have no one else to turn to need someone at school, trained in counseling to guide them through the tumultuous years of middle school and high school. Please think of our youth. They have endured as much as the rest of us the last 2 years, but have done it while navigating school, friends, hormones, activities and home.

Sincerely, Hillary Riggin

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We need one counselor and librarian in every school. Counselors work hard and need to be permanently on the school building. Librarians also need to be in the building. No building should be without and have other situations going on. Teachers and other staff members cannot have other duties put on their plate.

Sincerely,  
Kaitlin Geer

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Hello.

My name is Kelsey Brown. I am a 10 year teacher and have spent this last year as a principal. I am absolutely appalled that Superintendent Arntzen is looking drastically cutting counseling and library service to our students.

After a pandemic, and the most challenging time in education, we should be upping the counselor to student ratio. Our students are in need of mental health support. Our students need to have counselors more available to them. Our students need to have the opportunity to receive counseling courses in the classroom. By increasing the counselor to student ratio, you are only hurting our students. And our students are exactly why we are here.

Artzen would be hurting our schools by making this change. Especially the rural schools of Montana. Please vote against this. Mental health is a serious issue and the red flags are seen drastically by students every day. We need to do what is best for students, and this is not it!

Also cutting library services is another concern. Once again our students would be losing out on a great opportunity. So many librarians also teach technology. There are required standards that are met and are taught by librarians each day. By making this change our students are suffering.

It seems as if Artzen does not have our students at the forefront of her mind!

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Dear Committee Members,

This afternoon you will be considering a rule change regarding the student to counselor ratio proposed by Superintendent of Schools. This proposal is detrimental to the students of Montana. Our state is made up of many small rural schools whose only mental health services come from the school counselor. I feel this proposal does not represent Montana Schools or the needs of our small communities. Please vote against this proposal for the well-being of our Montana students.

Shyla Barnosky  
Miles City

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The national recommendation is 1:250 and Montana's current requirement is 1:400. I can't imagine our state with NO ratio. Montana kids deserve to have a school counselor who can effectively provide them services; whether they go to a "AA" school like Billings or a "C" school.

With all the trama our kids are dealing with these days. This would be the worst thing for them to do. Not only do our school counselors support our kids and families, they also support the teachers. Please look closely at this and what is best for our kids.

Thanks,  
Chelsi Podoll  
2nd grade-Highland Elementary

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Dear Mr. Loveridge,

When the Negotiated Rule Making Committee meets tomorrow, please DO NOT make any changes to the librarian or counselor ratios in Montana schools. DO NOT listen to Ms. Artzen's short sighted recommendations that will adversely affect Montana's students.

Every student in Montana deserves to have a school with a fully trained and certified librarian. Librarians not only introduce students to books, but provide students with vital 21st century skills such as media literacy.

Most alarming to me is the recommendation that could reduce the number of counselors in Montana's public schools. As a teacher, I see students struggling with anxiety, depression, family issues, and trauma on a daily basis. As we are trying to recover from a pandemic, is REDUCING the number of counselors going to help or harm the young people of Montana? We already face one of the highest youth suicide rates in the country, and I hate to think of what might happen if we lose additional mental health staff in schools.

You know the right and ethical choice to make tomorrow-keep the librarian and counselor ratios in place!  
Thank you,  
Jacqueline Marshall

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I've read the positions of counselors and librarians are being considered for drastic cuts. I am an elementary secretary who sees daily how vital these positions are to the wellbeing of our schools. I am begging you to crush the movement to decrease these roles so critically needed for student health, safety, growth, and so necessary for a school to thrive.

Our counselor crafts desperately needed social/emotional and behavioral lessons tailored to each grade level's ability to comprehend. She goes above and beyond to help our more emotionally fragile students when they are overwhelmed. She supports administration when multiple students are in need of help at exactly the same time. Her input is essential in identifying and deciphering which students need what type of support or intervention. She has a crucial role in guiding families through difficult processes and helping them find resources to help their individual situations. The need for mental health care and social emotional programs is not decreasing in our schools, it is increasing exponentially. Mental health is a crisis in our society as a whole. Never has the need been greater than now in our schools. If anything we need to expand access for social/emotional support.

In this digital age of information the need for a librarian is essential. Our libraries provide so much beyond checking out a book. Not only is the librarian a purveyor of the love of the written word but also a needed connection to the world of technology. Her advocacy for literacy moves beyond the library to every part of our school, into families and the community. A librarian's role includes helping students discover how and where to find information safely and responsibly. How to differentiate fact from fiction. Whether a student is researching a topic for pleasure or instruction intellectual growth is occurring.

She promotes communication skills in her book clubs and supports our students in self discovery through exploration of all that is possible in the world of information. She provides introduction to engineering through robotics centers that some students would never have access to or would have known they needed. Her tireless work in fundraising through readathons not only inspires families to read and grow together but also raises much needed money for materials that keep our library current and interesting. She supports our school by applying for grants enabling much needed updating to computer labs and iPads not only for the library but

for our school as a whole. This year we will provide interactive boards to every classroom, something achieved only through her efforts. She shares her resources and skills liberally through every grade level and classroom for student and staff support and development.

Both of these positions are the glue that pull our individual classrooms into the structure we call a school. They are the support beams imperative to distributing the weight of education. They lift up students and staff alike, tirelessly working for the success of our schools. If anything we need more of this type of support for our students and staff, not less. Please, please, protect these valuable and critical positions.

Thank you,  
Christy Zimmerman

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RE: Librarians and counselors

Dear OPI,

It is with great concern that I write this email. I worry about the choices you are making in regard to librarians and counselors. They are needed, utilized, mentors, teachers and a fabulous part of school climate. Children need to read books!!! Do we really want students only attached to a screen and not learning how to use books- how will we foster new authors, researchers and illustrators? Children need to be mentored by our counselors, they need a safe place in this current state of schools. The students have pandemic needs, there is low moral of life- we need each other as colleagues and students need the counselor's heart and ears in their time of need!

Please reconsider what you are recommending for the future of our Montana children!

Paula Jones  
Smith Elementary

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Good Morning,

I am writing this email as a concerned citizen, taxpayer, and parent to urge you to maintain the current librarian and counselor ratios.

Making cuts like these will have a long-term drastic effect on our kids and the future generations of Montanans.

In fact, every single one of the proposed changes that Mrs. Arntzen has brought up are uninformed, unrealistic, harmful, short-sighted, and just don't make any sense at all to a rational person who cares about the future of our kids.

We have seen so many unfortunate outcomes in education in the recent past as a result of poor decision making and we cannot let this be another example.

Enough is enough.

Let's do the right thing and make our schools better than we found them and not the other way around. You have the power to make a difference. Please listen to your heart and make the right decision.....our kids are counting on you.

Sincerely,  
Tim Rooney  
Bozeman, MT  
Parent of 2 Middle schoolers

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Good evening,

I find it hard to believe that the Office of Public Instruction is proposing this action on the heels of publishing the 2021 Youth Risk Behavior Survey. It is

clear that the youth served in Montana Schools are desperately in need of support at this time. In our more rural parts of the state (of which there are so many), the school counselor may be the only person a child can access for support with their mental and behavioral health needs. For the socioeconomically disadvantaged the school counselor may be the only person a child can afford to access for support for their mental and

behavioral health needs. It is unfathomable to me that OPI can consciously ignore their own data on this subject and propose removing what is possibly the only support many of our children have. I implore this committee to consider the ramifications of this action and make the decision that supports the most vulnerable and in need of protection and support among us - our children.

Eden Roberts

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Elsie,

Cuts to school counseling staff should not even be a topic of conversation. Our country has a mental health crisis going on. School counselors are of the utmost importance to our youth. Do what's best for kids by not even considering cutting some of the most important staff members in our schools. If anything, you should be coming up with ways to add more counselors to each school.

Sabrina Schuler

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mental health professional and the parent to two sons who attended public schools in Billings. I am acutely aware of the mental health crisis occurring amongst the youth of Montana. Rates of depression and suicidal thinking are skyrocketing, and suicide attempts are double that of the rest of the United States. Eliminating required ratios for school counselors would be extremely dangerous for our kids. It would reduce access to vital mental health services in schools, especially for those with the highest need and limited or no access to similar resources in their rural or underserved communities. Please don't turn your backs on our most vulnerable citizens – children with serious mental illnesses.

I also urge you to reconsider changes to rules that would reduce access to school libraries and other elective requirements. Children thrive on exposure to all types of curricula, including the arts, for their mental health. This would further add to the mental health crisis amongst Montana's children. Please keep the current language and standards to ensure the best for all of our students.

Sincerely, Carla Cobb

Carla Cobb, Pharm.D., BCPP  
Clinical Psychiatric Pharmacist  
Billings, MT

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Greetings,

I am opposed to the proposed reduction of school counselors in Montana schools. The pandemic was the straw that broke the camel's back, and now is definitely not the time for a reduction. If anything, the counselor-to-student ratios should be increased.

-Mark Campanelli  
Bozeman, MT 59715

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Hello, as a mother of a child with a diagnosis that I have sought school assistant for and have been told there is little availability to him for counselors, it shocks me that the state would consider further reducing the ratio of counselors to students.

This disturbed me and angers me. In this time more than ever, we should be increasing our help and services. I urge to you do the right thing which is to look at the needs of students (the need for help is vastly more than what is currently offered). Do not make this worse, for our children's sake.

I am available for further discussion, and will provide contact information upon request.

In hopes that we double the number of available counselors rather than reduce,  
-Jamie Kirby

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After 40 years in education, with serving the last 16 years as a school counselor, I can see clearly the suggestions from OPI and Elsie to lower the standards for the ratio for school counselors and librarians is an incredibly irresponsible plan. It sets the educational standards backwards nearly a quarter of a century! Besides being a genuine disservice to students at all levels, the degree to which those and other reversals will reinforce the opinions of those who view public schools as inadequate is clearly at issue. Montana schools have always been ahead of the curve and have continuously educated our children to compare with and surpass students anywhere in the states or abroad with high academic achievement levels. We have excellent teachers who love their work and their students. Don't undermine what works in Montana education and mental health support in the name of shortsightedness by those who don't work with students or because of money. Mental health issues are at the forefront of our problems in our society and schools, and diminishing counseling availability for students makes absolutely no sense at all! Vote against both proposals!

Alison Schmaltz

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I am a Montana resident with two students in Montana schools. I must stress the importance of school counselors and library media specialists at the schools. I would encourage you to maintain current ratios for these positions. I also believe it is important to maintain current elective offerings. I do approve of the proposed changes to include financial education and recognize Native Americans.

Amanda Wiederien

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need.

Elsie Arntzen is a short-sided conservative pawn who cares little about students, and even less about teachers. This policy would be at a severe detriment to the future of Montana.

Laura Wilson  
Bozeman, MT

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Date: May 17, 2022

Subject: Negotiated Rulemaking (NMR) Committee & School Counseling Staff, 10.55.710

To whom it may concern,

I appreciate the NRM committee's consideration to review my comments regarding **School Counseling Staff, 10.55.710** recommendations made by the office of Superintendent Elsie Arntzen.

I have concerns with and have written a letter to the Montana Negotiated Rulemaking Committee regarding the recommendation to eliminate the ratio of school counselors to students and cut out counselor services in school districts across Montana. I read Superintendent Elsie Arntzen's brief Facebook post three days ago about National Mental Health Awareness (and celebrating police week). Earlier on February 10th, she posted about the Youth Risk Behavior Survey, which school counselors administer, and shared data proving significantly higher suicide rates in Montana. Her comment was "the [YRBS] shows...the highest rate ever reported on the Montana YRBS" and

continued to promote counselors. She then stated school counselors are "vitally important to the prevention of youth suicide and response to students experiencing a mental health crisis".

Montana has the third highest suicide rate in the country currently, and not long ago in 2018, it was ranked the highest in the country.

Since 2012, social media and electronic devices usage and anxiety, depression, and suicide rates have increased. The Montana YRBS shows an increase in student's mental health needs, and in response, school counselors and other mental health professionals are working hard to eliminate the negative connotations associated with the word "counseling" to make sure students get support in schools. In rural communities, there is a lack of mental health resources for students and other community members, and this proposal will leave many districts without any

resources. It is not much better, in larger parts of Montana, which in 2018 [NBC News](#) wrote "Montana had the highest suicide rate in the country". By limiting Montana's students' access to all of the school counselors I have had the pleasure of working with through the Montana School Counselor Association, Superintendent Arntzen is working to undo all of the hard work we have put into our school counseling programs. If she truly supports her social media posts, she would be rethinking the proposal to eliminate access and cut these services, and the committee should, too.

This year I began working at Kalispell Public Schools as an elementary school counselor. For the previous 7 years, I taught at a rural and low-income school (RLIS), Chester-Joplin-Inverness Schools. I was a critical part of this district serving as a teacher, two-sport coach, mentor, school counselor, adviser, MTSS Coordinator and much more. It was my home, my roots, and the students were the reason I stepped up. Before I became a certified educator and school counselor, I grew up in the same school, and after high school, I was a coach and substitute teacher, helping out wherever I could. I worked with countless students on self-control, problem-solving skills, emotional regulation, and how to be their own advocates in every job I had with the school, but was able to do much more when I became school counselor for grades k-12. These skills are just a few of the things school counselors teach students, and I stress all of these points in my professional history because I could not and would not have done any of this without the push from my former high school counselor and the following school counselor I worked with and succeeded. I was fortunate enough to have these outstanding educators advocate for me and inspire me to be a leader in my community.

While I am against many of the recommendations made that will be reviewed by your committee (Library, music, middle school electives, graduation requirements, etc.), I feel the strongest toward the elimination of the school counselor ratio because of the current work we are doing as school counselors. This proposal should consider a higher ratio of school counselors to students.

One counselor per school is not enough most school days, and school counselors, especially rural ones, wear many hats to ensure students receive the best education.

I invite Superintendent Arntzen and the committee to check out what Montana's school districts are doing with their counseling programs. I encourage you to ask for their data and see the differences we make in our schools. I, for one, am working to build our school's counseling program while you are busy tearing it down. Please, I urge you to reconsider this proposal and its aim to cut school counselor services, as it is harmful to all schools, especially RLIS districts.

Sincerely,

Allyson Jones, School Counselor, M.Ed.

[theoptimisticcounselor@gmail.com](mailto:theoptimisticcounselor@gmail.com)

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Dear Superintendent Arntzen;

Access to certified librarians and mental health professionals is important for Montana's public school students success and graduation statistics, and your current recommendations are moving to do away with required staffing ratios for librarians and counselors in our schools (which will greatly impact my local RURAL school where I have children enrolled and a husband who is employed as a teacher) and it will lower education standards across the state. The idea is to provide options for rural schools who can not meet current staffing requirements but what this will really do is lower education standards and quality education for ALL of Montana's students. In our opinion, our schools are failing because of the lack of state FUNDING and LEADERSHIP and not because there aren't qualified teachers, librarians and counselors who want to reach higher than the current bottom shelf education policies and standards.

What baffles me is that you seem to be a proponent of mental health awareness, education and advocacy because on February 11th you posted on your Superintendent Elsie Arntzen Facebook Page: *"Nationally, suicide is the second leading cause of death for school-age children over the age of ten. In Montana, the 2021*

Youth Risk Behavior Survey (YRBS) shows over 10% of Montana students surveyed made a suicide attempt in the past 12 months, and 41% reported feeling sad or hopeless, the highest rate ever reported on the Montana YRBS. All school personnel play{sic} a role in supporting student wellness. School mental health personnel such as counselors, psychologists, and social workers are vitally important to the prevention of youth suicide and response to students experiencing a mental health crisis. Click the link to see the Montana YRBS Survey: <https://opi.mt.gov/.../Montana%20Students%20and%20Mental.../facebook.com>

" So, forgive my confusion, why would you work so hard to restructure and recommend the cutting of funding and access to the same mental health care plan you seemed to champion just 3 months ago. Have you forgotten who you represent? CHILDREN. FAMILIES. EDUCATORS. I am greatly concerned about your latest policy making and leadership. In fact, we side with many public-school superintendents and administrators who publicly called for a vote of "No Confidence" in your leadership as recent as December 2021.

Please rescind your recommendations and return to the table with public school administrators, school boards & educators. They certainly deserve more than what they are being dealt and the children deserve more than they are being served. Please do not withhold these critical lifelines from our children which will further impede education efforts across our state.

Truly,  
Janna Lauver  
Three Forks, MT  
Graduate of an excellent public school system in 2000

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I am here to comment on the proposal to limit the ratio of school counselors to students, resulting in less mental health resources for our students. I teach 9th and 10th graders in Kalispell, prior to this I taught 7-12 grade in Chester. It doesn't matter what size the school is, I can tell you right now that mental health and suicidal thoughts are running rapid through our youth. Students need access to school counselors at all times. They are vital to the schools operation and safety of our students. I can only help so much as a teacher without the college degree of a counselor. I can't have a students self harm, or worse, be my fault because I didn't know how to properly support them. Kalispell is currently in a suicide cluster- which if you truly care about education in Montana you should know. I can't even count the number of students who have confided in me with the mental health struggles which resulted in me immediately contacting a counselor to take over. If you want to see the suicide cluster travel to other towns across Montana then, by all means, continue with your ignorant plan. If not, please take a long look at yourself and your decisions. Ask yourself what in the world is wrong with you? Where did you go so wrong to end up with this as your solution? Then throw this idea in the trash where it belongs.

Sincerely a very exhausted, concerned and frustrated educator,  
Kalee Knust

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I strongly disagree with Superintendent Arntsen's proposals to do away with ratios of librarians to students and of counselors to students. The students in rural schools especially will suffer with such changes. We need more services for our public schools, not fewer!

Deborah Tomas, Moiese, MT 59824

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Hi, my name is Eric and I am a parent of children attending schools here in Montana. I am writing this in to ask you to please deny the recommendations being made by Supt. Arntzen. This move would be a complete disservice to all students in this state especially those in rural areas. I am appalled that Arntzen is attempting this destructive idea and I hope that it ends at the meeting tomorrow afternoon. Counseling is needed now more than ever for our kids in the wake of Covid and the near constant barrage of issues these kids are facing. Removing access to counseling will have lasting and far reaching consequences for these kids. These are often the people who are silently doing the most for our kids. They provide ideas and alternative outcomes. Many times they are what stands between the child and a disaster until more resources can be found. Library

time is also at stake with this recommendation along with a host of other items. All of which will mean our kids lose and lose big if this recommendation is entertained. Children attend our public schools to learn, to learn everything they can and to be prepared for the next level. These services are the girders that hold the process in place as they move forward with education. Why would we even entertain the thought of destroying these important services. Please take this into consideration before the decision is made. Strike the recommendation down permanently and see how wrong it is. Thank you for your time.

Eric Veca

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Dear Committee,

I spent 32.5 years working with outstanding teachers and schools in Montana, mostly in mathematics at all levels as well as working in that area at the University of Montana. I found the help of librarians and counselors to be amazing across the board. The use of library books of all types, fiction and non fiction, was extremely helpful when the teachers and librarians worked together to assemble suggested readings on given topics. For example, when I worked with a third grade teacher and a class on big numbers, a nine-year-old asked if infinities could be compared. I was in shock. This was a topic that most never consider and if they do, they are typically math majors at a much higher level. However, the librarian and teacher worked with me to find appropriate books to encourage this student in finding the true answer of yes using books that he could understand. This was one question from one student in a class of about 20. The teacher alone would have struggled to answer the question and would have needed hours to find the needed material to help. The librarian was vital. The teacher is now retired and lives in Missoula (Margaret Grant Scott) and can verify this episode.

Similar stories verify the need for counselors. Please do not accept the recommendations for change suggested be the current superintendent. Public schools are vital in Montana and across the nation. The acceptance of the recommendations is another chip at the foundation to destroy them.

Thank you for reading this.

Johnny Lott

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 200 number of students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Dylan Wright

Frenchtown High School, MT

---

Dear Tristen,

I am unable to attend tomorrow's meeting but I believe that reducing/eliminating/contracting out school counseling is a terrible idea. The mental health of our students is already in jeopardy, especially post Covid. It is very difficult for individuals to find counseling services already please don't not remove a very helpful and

necessary avenue to help them within our schools. Please refer to this article:  
[https://www.apa.org/monitor/2022/01/special-childrens-mental-health\[apa.org\]](https://www.apa.org/monitor/2022/01/special-childrens-mental-health[apa.org])

And our librarian at Monforton Middle School in Bozeman, MT has increased free time reading and book check outs by huge amounts over this past year. She is an asset to our school and has created a safe, comfortable space for our students to learn.

Thank you for your time!

Melissa Kuchynka

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Dear Tristen,

I see that there is a vote to possibly change the 1/400 ratio of councilors to students and I beg you to not allow the change. Our children need counselors more than ever right now and it would be an absolute travesty if the already minuscule ratio were made worse. Please think about these children and vote to maintain the current ratios. Thank you.

Sincerely Logan Bloom

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Hello,

I'm writing in regards to the cutting of school counselors in Montana schools. This would be so harmful to the children growing up in our state. Now more than ever, our kids need counseling. The COVID-19 pandemic affected our children in so many negative ways that I would argue we need more school counseling than the 400/1 ratio. I work with high school students after school hours and EVERY SINGLE ONE of them is hurting and in need of the attention counselors provide. Please don't cut this from our schools. Saving Pennies at the cost of childrens lives is not worth it.

Sincerely,  
Katie Resch

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As a retired teacher and school librarian, I send this message to NOT decrease the school counselor ratio! From learned experience, I saw the need for more student/counselor time even before I retired in 2012. Now with students struggling with the aftermath of Covid, the support of school counselors will be in high demand. I ask that the ratio stay as it is or increase it for the well-being of our students.

Sincerely,  
Dianne Van Auken

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Tristen,

Please pass this message on to the committee reviewing the staff ratios for Montana schools. DO NOT FOLLOW ELSIE ARNTZEN'S lead on this matter! Montana needs libraries and counselors and this lady is trying to destroy our public schools!!

Thank you.  
Tom Burgess  
Missoula

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Negotiated rule making committee,

Increasing the counselor to student ratio would affect students mental health and physical well being. Suicide rates among Montana youth are increasingly high and the risk behavior survey indicates many more students are at risk. Students need counselors they know and trust in their school. Increasing the ratio reduces the amount of time and energy counselors can spend with each student. I'm asking the committee today to consider denying Artzen's recommendation and maintaining the current rule and ratio.

Sincerely,  
Katie Brooks

Great Falls, Montana

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I disapprove of Superintendent Arntzen's recommendations for multiple reasons. First, the counselor and librarian staff are crucial to children's access, especially at this time. Second, the elective classes are extremely important for kids to have access to, to expose them to different opportunities to learn skills and find a niche they enjoy. Lastly, the yearly core classes are a requirement to hold a standard for our kids, and taking that away would only hurt them. Overall, this does not have the best interest of our kids' success in mind, and should not be approved under any circumstances.

Thank you.

Bryson Mobley

---

Hello

I am writing to voice my opposition to the reduction in counselors and librarians being proposed by Superintendent Arntzen.

Please instead implement a waiver process with limited criteria by which a school may provide less than the required staff for libraries and counseling.

The proposal to limit access to mental health assistance just after another youth engaged in a mass shooting is especially problematic and demonstrates Superintendent Arntzen's disregard for the students under her care.

Thank you for your time.

Laura Humberger

---

I believe that the changes proposed to librarian and counselor ratios would have a very negative impact to our students. We try to find so many ways to skimp and save at the expense of the future of our young people. As an elder citizen, I am glad my parent's generation didn't sacrifice the quality of my education and future. I hope this generation will see the error of their ways and do the right thing for the next generation.

Sincerely,

David Blair, 62  
Great Falls, MT

---

Hello,

I am writing in strong opposition of the changes to 10.55.710. As someone who has benefited immensely from access to counseling services myself, I have also seen how counselors save lives and give students hope for a brighter future. As I'm sure you're aware, there are more young people in crisis now more than ever. I live with a school counselor who is already extremely overloaded in her work. As a community, we simply cannot afford to cut student's access to these critical mental health workers. Please do not pass these changes. Our students' lives and futures depend on it.

Thank you for your time,

Ryan Winn

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Ms. Arntzen-

I am very concerned about some of the changes you are proposing in your office that will adversely affect students in Montana.

As a teacher of 35 years (now retired), I can attest to what students NEED and need MORE of, and that is counselors. The students I dealt with in both well-to-do and poor communities have so many needs that are

currently not being met! Counselors at schools where I worked were barely able to put out the "fires" and rarely had time to meet the needs of countless others. And as willing as I was as a teacher to try to help individual students, with 150 students a day to plan for, grade work for, and work with, that was barely possible. As the person in charge of OPI, I beg you to lead the charge for MORE counselors, not fewer.

In the case of libraries, I feel equally passionate: we need libraries, librarians, and endless materials for students: these students represent our future. Should our goal not be to educate them and give them as many resources as possible?

In that same light, art and music are not fluff: they are enrichments that enhance the learning of students. They are vital to the curriculum and to the education of our students.

Our children are our future--that is a certainty. Our responsibility as adults is to give our students the very best education possible. Schools are NOT PLACES TO CUT CORNERS. We need to provide these young adults with our very best curriculum, support, and encouragement!

Sincerely,

Mary Ann Darby

Hamilton, MT

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Please don't risk reducing the number of counselors our kids have access to. This is too important. I do not support getting rid of requirements for their presence. They're already spread too thin.

Liz

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Please retain the counselor/librarian ratio per student please.

Our kids are hurting and it is evident with the suicide rates. Just last week a suicide in GreatFalls and how many in Helena.... hey what about Kalispell rates? Young people killing themselves is an issue! What a better place to have access to a counselor when they students are in the school environment for 8 hrs a day. Make it a safe place and help educate, normalize the importance of our brain health!

Keep good counselors in schools and provide support groups!

Traci Hronek

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Dear committee members,

I am writing in strong opposition to the rule changes proposed by Superintendent Arntzen. At a time when almost half of our students experience depression and similar mental health crises, we need MORE counselors and staff that are trained to support them, not less. The proposal to cut counselors, librarians, and arts programs is blatantly politically motivated, and if it is enacted, Montana's kids will suffer because of some partisan game of politics. These staff and programs are doing their best to support Montana's kids and cutting them would leave a gaping hole in the educational system here. As a fifth generation Montanan and product of our educational system I can firmly say we need to be ADDING to these programs rather than taking them away. I am disgusted at this proposal and seriously considering sending my daughter elsewhere to get her education, since it's clear that a well rounded curriculum and supporting students to be healthy are not priorities here in Montana. I'm sad for my state but more so for it's young people.

Please reject these proposed changes.

All the best,

Julie Williams, Livingston

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A national agenda is not a good fit for Montana. I taught high school English for 30 years. Librarians were essential to turning nonreaders into passionate readers. I would walk a kid to the library and the librarian, student and I would talk about what the student felt passionate about. The librarian would walk around the

room, pull books off the shelf that were at the reading level and interest level perfect for the young person. Sometimes I'd have to pull the book away from the student during class time because he or she couldn't tear themselves away. I've seen that transformation many times because of available librarians.

We need counselors. Once a student mentioned suicide in a journal assignment for class. I told the counselor who could act quickly. She contacted the parent and arrangements were made that saved this student from a dangerous situation. I know Governor Gianforte has made commitments to strengthen our young people's mental health services. This starts with adequate staffing in our schools.

Middle school is a vulnerable time for our students. Our schools have made major investments in music, art and physical education to help students in this awkward age group grow and thrive. Eliminating requirements for special classes will make this vulnerable group more prone to mental health issues, therefore, slowing their growth.

Please don't push national standards to hurt education on Montana.

Patricia Kelly

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I am a parent of a 7th grader attending Washington Middle School in Missoula County Public Schools, writing to voice my opposition to the rule change reducing required numbers of counselors in schools.

My stepson and his peers have struggled during COVID. They have not rebounded from it. They need access to mental health support.

Some parents may argue that mental health support can be accessed outside of school. There are plenty of low-income, working parents who don't have the money or the time to be able to take their kids to access those supports. Having mental health support in schools is a way that we make school accessible to ALL kids - including the ones who have struggles in their lives that they need help with. Further, to not provide mental health support to those kids makes the school experience worse for their peers who aren't struggling emotionally.

My friend who is a mental health therapist at an elementary school writes:

We are seeing immense struggles this year with students lagging behind in social, emotional, and academic skills and displaying more intense behaviors which disrupt their growth and learning. While these challenges existed before, the overwhelming need we are seeing right now is a direct result of the pandemic, which put even more stress on an already dysfunctional and strained-beyond-capacity mental health system in our state. Increased social, emotional and behavioral challenges make it harder for teachers and other school staff to do their jobs, and burnout is at an all time high. Statewide, the youth suicide rate in Montana is more than double the rate for the entire country. Montana also ranks in the top five nationally for suicide rates among ALL age groups. Now is NOT the time to make it harder for students to access the mental health supports they need.

Thank you,  
Kelly McGuire

---

Hello,

I am a parent of a child currently enrolled in public school in Montana.

I was incredibly angry and disappointed to read the proposal to further reduce funding for our public schools and to change the required ratio of counselors and librarians. Shame on anyone that would punish our kids just to save a few bucks. Similarly the proposal to reduce the middle school electives is short sighted and unnecessary.

Please don't further reduce our already insufficient public school funding and support!

Thank you,  
Rita Berry  
BDS7 parent

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Please maintain the existing ratio requirements for school counselors and librarians. These are critical staff that are necessary for supporting our kids and eliminating the ratio would have a detrimental effect on our kids and their learning environment.

Sincerely,  
Ginger Palm

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Montana Office of Public Instruction:

I oppose the proposed plan to reduce the number of counselors and librarians in schools. I point to the fact that OPI has demonstrated that it is unable to manage its own duties with its reduced staff that has resulted from poor management at OPI. Since OPI is unable to meet its own obligations to staff, schools, teachers, families, and students in public schools across Montana, this plan seeks (in my mind) to expand and spread that ineptitude and management style like a covid-19 pandemic.

I recall that the Superintendent has been participating in anti-education forums and discussions around the state, has promoted privilege over equity, and even spoke at one event in which violence against school administrators and board members was suggested and encouraged. This form of educational leadership is clearly aimed at undermining public education in the state . . . and in many cases it seems to be working. But I am pro-education, I am pro-community participation, I am pro-inclusion, and I am pro-healthy-children. Since this proposal to reduce counselors and librarians in the schools seems to meet none of those goals, I adamantly oppose it.

Hal Schmid, Ed.D.

Arlee, Montana

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To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. We also need to keep school counselors at their current level, if anything, we need more of them. These proposed changes simply make no sense, we have a good system, let's maintain it!!

Yours sincerely,

Therese Michalson

Montana, 59715, United States

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Yours sincerely,

Karen Fliger

Montana, 59102, United States

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Yours sincerely,  
cassidy kipp

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On a personal note, I know that libraries provide a sanctuary for many students. Having a human librarian as a guide, students have a safe place to read and research, study and explore. The loss of librarians would be a detriment to Montana students in their lifelong learning.

Yours sincerely,  
Courtney Feldt  
Montana, 59937, United States

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Yours sincerely,  
Chris Maul-Smith  
Montana, 59828, United States

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Yours sincerely,  
Pam Meissner  
Montana, 59102, United States

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Yours sincerely,  
Dave Carman  
Montana, 59715, United States

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Yours sincerely,  
Pam Beard  
Montana, 59802, United States

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Yours sincerely,  
Michelle Adsem  
Montana, 59602, United States

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Yours sincerely,  
Donna Philip  
Montana, 59457, United States

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To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,  
Sonia Young  
Montana, 59538, United States

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Yours sincerely,  
Elizabeth Weber  
Montana, 59803, United States

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Yours sincerely,  
Ardis Cotton  
Montana, 59722, United States

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Yours sincerely,  
Kim Lapp  
Montana, 59349, United States

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Yours sincerely,  
Jane McFarlane  
Montana, 59601, United States

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Yours sincerely,  
Patience Burns  
Montana, 59901, United States

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Yours sincerely,  
Linda Lang  
Montana, 59102, United States

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Yours sincerely,  
Janet Williams  
Montana, 59501, United States

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Yours sincerely,  
Melanie Moore  
Montana, 59404, United States

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Yours sincerely,  
Sarah Fenton  
Montana, 59601, United States

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Yours sincerely,  
Breann Streck  
Montana, 59063, United States

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Yours sincerely,  
Julie Clifford  
Montana, 59701, United States

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The proposal to have only one library Media Specialist in a school no matter how large the school would have a negative affect regarding student achievement. In addition, newer studies conducted over the last several years, show that strong school libraries are also linked to other important indicators of student success, including graduation rates and mastery of academic standards. Librarians today are often on the cutting edge of education technology and because librarians work directly with all teachers and students, they have the big picture that make them assets for building and district leadership regarding curriculum, technology and other programs that affect the entire school community. As a former LMS and chair of CSPAC I am appalled that this proposal is even being considered.

--Gloria Shook Curdy

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To whom it may concern,  
I absolutely oppose decreasing access librarians and counselors. These are much needed, vital positions for our students.  
Megan Gordon

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Dear Board of Public Education and Superintendent Arntzen,  
I am writing to express my concern with the Superintendent's proposed changes to Montana school accreditation requirements. Certified, professional school librarians and counselors provide critical services in our schools, and reducing the required staffing ratios would be incredibly detrimental to students. Over time, it would do immense harm to public education in Montana.

As a certified school librarian myself, I believe strongly in the importance of library services and see firsthand the difference school librarians make in our communities. Librarians play an essential role in literacy education,

as we help students find books and materials they connect with in order to become enthusiastic readers. We teach students how to research and find information responsibly and independently. We encourage collaboration, spark curiosity, and help students to find and keep joy in learning. In states where certified librarian requirements have been reduced or eliminated the way the Superintendent's current proposal would do, library programs have been stripped to bare bones, and services have been slashed. Not coincidentally, reading scores have also tanked, and students have suffered irreparable harm.

Please reject the current proposal, and keep librarian and counselor ratios intact. Our students in Montana deserve quality public education, and that includes access to professional librarians and counselors.

Alice Asleson  
Librarian, Billings Senior High School  
MLIS

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As a former educator and current school board member, I strongly oppose any change requiring fewer counselor and librarians.

School Counselors meet with children and young adults who are experiencing greater stresses in their lives than ever before. People live within a wide open 'let's be bombarded with' news from around the world: war, drugs, racial hatred, political diatribes, hunger, famine, inflation, gun violence, and increased entitlements from specific population groups. All this contributes to stress especially in children and teenagers, questioning how will they ever live freely in this world. Counselors provide a sense of stability to a world always in upheavals. Providing support for the children is an ever-growing need.

School Librarians provide a place in school that is non-judgmental and open to every student. Students can freely explore without repercussions, there are no grading requirements to fulfill, and no competitions between classmates. Librarians work with students on explorations of their world through free and required reading.

Who else can be available for that help?

Please keep the requirements that are in place now or enhance them to be better. Do not reduce the requirements. We need to continue to support and protect our students.

Thank you,  
Ann Boston  
Butte, Mt 59701

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I am against the proposed rule changes for counselors and librarians in our Montana Public Schools by Elsie Arntzen and her task force. These changes are NOT needed and should not even be considered. I have lived my whole life in Montana and believe in our public education system. Unbelievable these changes were even proposed. A suggestion to Elsie and her task force is to find better ways to financially support our public schools. We need to make them better and owe a great PUBLIC EDUCATION to our children.

Bridget Gauthier  
Registered Voter  
Park City, MT 59063

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I read about the proposal that Arntzen recommended to the Task Force. The recommendation to let the local school decide about the number of counselors and not having a library or librarian is unbelievable to me considering the issues the kids in Montana are facing. There are a lot of kids that need a person to talk to and someone looking over the kids to try and identify ones that are struggling and need some help. If anything we should be increasing the quota and funding for more counsels in schools. If left to the local schools some may not have enough funding and would be forced to make cuts possibly eliminating the counselors out of necessity to keep the doors open.

Arntzen should reflect on Andrew Carnegie idea which was "So public libraries became instruments of change — not luxuries, but rather necessities, important institutions — as vital to the community as police and fire stations and public schools". This is also true for school libraries. Montana kids use the school libraries as a

safe place to read, check out books, learn about new ideas through books and printed material. We all have spent time in a Library and have felt the calming effect it has and the reassuring feeling you get when you know you have a librarian to help you find the perfect book or research material for a school project.

The idea Montana has a Superintendent of Public Instructions recommending Montana remove the quota for counselors and giving the discussion to the local schools on number of counselors along with removing the Liberian and Libraries from any school is appalling.

How did we get to this stage in Montana. I strongly believe this is not the Montana Public School direction or policy that is good for future generations so I also forwarded this to Governor Gianforte, Senator Daines and Senator Tester.

Please feel free to contact me if you want to discuss further.

Dan Brennan

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Greetings,

Today, I read an article in the Helena Independent Record in which several educators and concerned citizens expressed "strong opposition" to proposed rule changes that would lower the requirement for both school counselors and librarians. While large school districts may not have a problem staffing counselor and library positions, I am here to state that small, rural, and reservation school districts in Montana do! Many school districts like mine simply can't attract candidates for these positions, librarian in our case, despite offering several financial incentives and even housing. In relentless recruiting efforts, I have not found a single candidate for our library position. It is as if new educators with special endorsements, like counselor and library media, no longer exist. Train an existing teacher for the position you say? I can't afford to lose a teacher from the classroom. Half of our classrooms are currently staffed with international teachers. Yes ladies and gentlemen, the staffing CRISIS has reached a near catastrophic level for my District and many similar districts! We are about to go into our third school year with an accreditation deficiency for school librarian and there is nothing within the District's power that we can do to resolve the problem. How then is it fair or just to penalize our accreditation status? How is it equitable when we don't have the same resources, in terms of a more desirable geographic location and amenities, to attract these special educators compared to that of our larger more urban colleagues. The answer to both these questions is that it's NOT JUST or EQUITABLE!

As I understand it, the proposed rule changes do not **require** all school districts to reduce their number of school counselors or librarians; the suggested rules merely lower requirements. Therefore, utilization of the proposed rules would be a choice of each individual district. To the best of my knowledge, nothing in the language of these rules says that a district cannot employ more than the minimum requirements for counselor or librarian. Local control of these kinds of decisions is a part of what makes Montana great and distinguishes its style of governance from other states. Ultimately, the people have the power to decide how many counselors or librarians their school district employs by voting for school board candidates who support their position on the issue. Therefore, large districts that staff many of these special educators can keep their current staffing level despite the proposed rule changes so long as the majority of its constituency supports it. For district's like mine, the rule change could be utilized to contract with a consortium to provide for our library needs while we continue our search for a full time librarian.

In conclusion, I cannot recall a single administrator that has expressed a lack of appreciation for the vital positions of school counselor and library media specialist. Would the world perfect, every district would have as many of these special educators as they need. Until that time comes and on behalf of my District and all those similar, I humbly ask for the flexibility to contract with a consortium so that we might have a more equitable path to full accreditation.

Respectfully,  
Josh Patterson (EdD)

**Brockton School District Superintendent**

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I appreciate you all taking the time to consider Superintendent Artnzen's recommendation in regards to the School Counselor to student ratio. I am writing to strongly encourage you not to accept this recommendation from Superintendent Artnzen. Currently, the national recommendation for the "school counselor to student ratio" is 250:1. Montana's current ratio is 400:1. If it was decided to get rid of the School Counselor to student ratio, we would be going the opposite direction when it comes to what is nationally recommended to best serve our students.

As a high school counselor, I feel as though we are stretched thin as it is. Even prior to the pandemic, student emotional health as it related to anxiety, depression, and suicidal ideation was on the rise. When looking at the most recent data from the Montana Youth Risk Behavior Assessment, it is clear that there is still significant need for mental health services. Not only are school counselors an integral part of serving the mental health of our students, but we also are responsible for career/academic support, course registrations, family support, and many more duties and tasks that are assigned. If we continue on this trend, it would be unrealistic to properly serve our students the way they need to be served. Funding has already been reduced to the point where schools have lost their CSCT programs and other mental health services. Outside therapists and counselors currently have significant case loads that make it difficult for students to even get the help they need in those settings. The need for school counselors and mental health professionals has never been higher.

So again, I urge you to oppose the recommendation brought to you by Superintendent Artnzen.

Thank you for your time,

**Logan McKenney - School Counselor**  
**Billings Senior High School**

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Please accept my public comment on Superintendent Arntzen's proposed changes to the above mentioned standards.

Having served on the Chapter 55 Task Force last time the Administrative Rules were reviewed, I can say from experience that the process unfolding now is the polar opposite of what happened 10 years ago. The condensed time frame for review, along with the lack of representation from constituents across subject areas, grade spans, school sizes and locations, and diversity of positions held in the field of education have made more work for those serving and reduced the available expertise needed for a robust process.

To speak specifically about school counseling and library recommendations, the fact that the suggestions to the Negotiated Rulemaking Committee are not those recommended by the task force but rather by the Superintendent herself is contrary to the intent and spirit of the process. It is underhanded and unethical.

As a County Superintendent (11.5 years thus far) who struggles to find professional personnel to meet the mental health needs of rural students, I am horrified that during this time of crisis for students and families that any recommendation to reduce the number of counselors schools are required to hire would be suggested. The opposite should be proposed--reducing the counselor-student ratio to 300:1 or 250:1. Kids and families are in desperate need of support, and the community resources available even in large communities, let alone small rural ones, can't meet the demand. I see students even in my rural schools struggling with such issues suffering severe anxiety as a result of long Covid symptoms, kindergarteners and middle schoolers alike who need help with self-regulation, kids with such severe depression that I'm worried we'll see a suicide in our middle school population. If anything, Covid taught us that we all desperately need to make personal connections face to face with one another--with our peers, teachers, students, parents, doctors, counselors, etc.

As a school librarian who has worked in two urban districts and now provides school library services to the rural schools in my county, I know first hand the impact school librarians have on students' growth as readers, academics, and civic minded citizens in our community. It improves school engagement, provides another caring adult students can connect with, exposes them to a wide range of high quality, carefully selected and frequently award winning literature. The collection developed by the librarian serves the needs of the school board adopted curriculum and the teachers' scope and sequence, as well as respecting and reflecting the values of the particular community. Librarians integrate IEFA into their curriculum and teach students how to safely and intelligently navigate the online environment. Contacted and reduced library services could never fill the role of a flesh and blood on site highly trained teacher-librarian. The standard should remain as it is, and in order to fill the librarian shortage, it would be helpful for the state to provide scholarships to support the acquisition of dual endorsements for preservice or in service teachers who are willing to serve in rural Montana.

Thank you for taking the time to review my public comments.

Respectfully,  
Erin Lipkind, Ed.D  
Superintendent of Schools  
Missoula County

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Montana Office of Public Instruction:

I oppose the proposed plan to reduce the number of counselors and librarians in schools. I point to the fact that OPI has demonstrated that it is unable to manage its own duties with its reduced staff that has resulted from poor management at OPI. Since OPI is unable to meet its own obligations to staff, schools, teachers, families, and students in public schools across Montana, this plan seeks (in my mind) to expand and spread that ineptitude and management style like a covid-19 pandemic.

I recall that the Superintendent has been participating in anti-education forums and discussions around the state, has promoted privilege over equity, and even spoke at one event in which violence against school administrators and board members was suggested and encouraged. This form of educational leadership is clearly aimed at undermining public education in the state . . . and in many cases it seems to be working. But I am pro-education, I am pro-community participation, I am pro-inclusion, and I am pro-healthy-children. Since this proposal to reduce counselors and librarians in the schools seems to meet none of those goals, I adamantly oppose it.

Hal Schmid, Ed.D.  
Arlee, Montana

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Please do not disrupt the counselors in our small schools. We need those counselors, and the current proposal will be detrimental to our students and staff.

Susan Erlenbusch  
Circle High School  
Teacher of 32 years--all in Montana

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Hello,

I am writing to express my concern regarding the current proposal to the School Quality Task Force regarding a reduction in the number of school counselors and library staff among other things.

As a school nurse I see the acute need for both of these positions in our public schools. As a member of a field of school staff that has been cut- I can say that a reduction in numbers does not help anyone- specifically our student body.

I would encourage the state to invest in our future, and continue to fund these positions.

Thank you for your consideration,  
Annie Watson  
MCPS school nurse

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The whom it may concern

I am writing to express my concern with recent suggestions put forth by Superintendent Artzen to effectively reduce the number of counselors in schools by removing ratios. If anything the ratios should be lower (i.e. more counselors per student) as data from the YRBS survey, conducted by the Office of Public Instruction, demonstrates an increasing need for counselors in schools.

Karl Vanderwood

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Why would the Superintendent of Public Instruction want to reduce counselors and librarians in our school districts when there is such a strong need for mental health in our schools? I do not understand how she could not be the loudest advocate for dedicated well trained counselors.

I cared for a grandson with mental challenges both in a small town and Billings. Living in both areas I could see the need for more counselors in the schools. Students suffer without mental health professionals. The rate of suicides in Montana is too high.

Barbara Kuester

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To Whom it may concern,

My name is Erin Tate. I am a resident of Billings, MT, candidate for HD50, and former public school social worker. As someone who has witnessed first hand the exceptional need for mental health resources in our public schools, I cannot help but think that Superintendent Arntzen WANTS to hurt public education students. Our school counselors and school social workers are vastly needed resources and are already stretched too thin. Instead of doing away with ratios, we should be thinking about adding resources to our school mental health teams. For many students, their school counselor or school social worker are the only connection they have to mental health resources. We should be increasing these resources, not reducing them. If Arntzen is concerned about funding, perhaps we can look at reinvesting funding that leaks out of the public system to private schools. We could look at the overhead cost that OPI incurs annually, or discuss the school funding formula to redistribute funds to high need school districts. These are just a few legislative options to consider before harming the health and wellbeing of our MT students.

Currently, several schools share librarians, restricting access to library books, research materials, and general instruction on how to effectively use the library. This is not how we go about providing quality education for our youth. Every school should have a full time librarian, nurse, and mental health team (school counselors and social worker). Reinvesting in the ever increasing needs of our youth is how we increase graduation rates, promote healthy lifestyles, increase our educated labor force, and begin the difficult task of reducing our out-of-control suicide numbers.

Elsie Arntzen does not care about our public schools. She does not care about our children. She does not care about the long term consequences of stripping much needed funding from public education. Arntzen is only concerned with lining the pockets of for-profit, financially exclusive, private institutions, effectively leaving everyday Montanans to fend for themselves. We cannot let Arntzen further strip resources from public school students.

Sincerely,

Erin R. Tate, MA, MSW, LCSW  
Candidate, HD50

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Dear Chapter 55 Negotiated Rulemaking Committee,  
I am a professional school counselor in opposition to Superintendent Artnzen's recommendation to eliminate the school counselor to student ratio.

I strongly believe that the counselor to student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they desperately need; the ratio should not only be kept in place but reduced to the national recommendation of 1:250 according to the American School Counselor Association. In my upcoming position I will be serving over 520 students; meeting so many students' needs is unrealistic and can be stressful as a single school counselor. There are many reasons why the ratio should be maintained at a minimum, the main reason being to provide adequate, necessary support for students, and also for school counselor retention and well-being.

"...in an ASCA-grant-funded meta-analysis of student-to-school-counselor ratio outcome studies, [Kearney et al. \(2021\) \[onlinelibrary.wiley.com\]](#) found that a one standard deviation change in the ratio is likely to result in a 6% standard deviation in student outcomes, especially in terms of improving attendance, decreasing disciplinary infractions, and increasing high school graduation" ([ASCA Website \[schoolcounselor.org\]](#)).

We know that Montana, especially being a highly rural state, is in need of more resources. It is simply incomprehensible why the state is even considering making it *more* difficult for students to access the support they need.

There is an increased need for mental healthcare nationwide (especially in the aftermath a global pandemic), leading to more crises and stressors experienced by families, affecting students' well-being and in turn their academic success. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. If the ratio is eliminated and not maintained or reduced, Montana's school systems would be retrogressing and weakening the already struggling system instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate vital access to mental health support in the schools, especially for rural areas, and reduce its quality.

There is already a large number of people leaving the field of education and it is extremely worrisome that this is even being proposed right now as it could perpetuate the current problems in education.

If you truly care about and prioritize students, their academic success, and their overall well-being, you will not only maintain the school counselor to student ratio in Montana, you will reduce it to a better standard.

Sincerely,  
Kaitlen R. Carter, M.Ed., LSC  
Professional School Counselor  
ASCA & MSCA Member

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Superintendent Arntzen:

Please do not recommend eliminating the ratio requirement for counselors to students in our schools! Our Montana kids need access to counseling support!

Thank you for understanding our children's needs in Montana are a top priority!

Sincerely,  
A Concerned Citizen

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To whom it may concern,

I am opposed to the proposed changes that would allow Montana schools to have fewer librarians and counselors. With the unrelenting attacks across the country on school libraries, LGBTQ students, and public high quality education in general, the last thing that should be done in Montana's public schools is to reduce

library and counseling staff. I am not opposed to inclusion of teaching students about the cultural heritages of Native Americans in Montana.

Michael King  
Helena, MT

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What possible benefits are there to these school changes? It appears Superintendent Elsie is trying to control mental health and free thinking in public schools. These changes do not benefit students or families. This is a waste of time and resources by an elected public official that is nothing but political grandstanding.

ShirLee and Mike Perrodin

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Dear OPI,

I'm writing in strong opposition to the rule change loosening requirements for school counselors in Montana schools.

I'm a pediatrician in Missoula and we are continuing to see growth in the number of kids suffering with anxiety and depression. Montana is always one of the top 3 states in the nation in suicide rates.

With mental health, school counselors are often the first line mental health professionals that pick up on issues with kids, and often can handle them right in the school, rather than having them escalate to needing mental health care in the community or in the hospital. We are sorely lacking in community resources for kids' mental health, and this change is a step in entirely the wrong direction.

Please oppose these rule changes.

best,

Lauren Wilson, MD

Vice President, Montana Chapter, American Academy of Pediatrics

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As a retired teacher with 25 years experience in public schools, I continue to be appalled by our current state superintendent of schools. This time she insists that cutting the number of required counselors and librarians would have no negative impact for our MT students. She's ignoring the recommendations of the very people who know best. It's obvious in which reality this woman lives. A scary one where the students aren't the highest priority. Where politicized parents are given more weight than trained educators. We need to vote this person out of office and return the position to someone who looks out for all students and staff. Bet she touts the Big Lie too like the other reactionary members of our state government. What an embarrassment! Please do what is right. Thank you.

Susan Doverspike

Stevensville

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I'm a grandmother of three, and a volunteer at one of the local public elementary schools in Helena. I'm at the school nine hours a week.

One of my grandchildren struggles with depression.

Since the pandemic, so many kids are having mental health problems, teens especially. A recent article in the IR reported that over sixty percent of teens are depressed--a truly alarming number. Yet Elsie Arntzen wants to allow schools to cut the ratio of counselors to students. I can't imagine a more misguided--and dangerous--decision.

And with some of the smaller districts wanting to ban certain books, I can't help but think that librarians will be the next "endangered species" in some schools.

Arntzen should listen to the advice of the Task Force, many of whom are appalled at her proposed rule changes.

Chris McGonigle  
Helena, MT 59601

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Good Afternoon,

I'd like to recommend the school counselor to student ratio remain 1:250, counselors do critical work in our schools and having a caseload of more students than this overburdens mental health professionals (like myself) and robs our students of critical resources.

I work at Charlo Schools on the Flathead reservation, our school of 250 students currently has two half time school counselors and that is just enough to address the academic, emotional & social needs of our schools. School counselors are an essential part of the school ecosystem and cannot work with double our intended caseload. Rural schools need counselors, do not rob students in rural communities of services they deserve and that their tax dollars should go to.

Sincerely,  
Gretchen Rude

---

I disagree with the proposal to reduce the number of school counselors and to reduce the number of library employees. Now more than ever we need trained counselors to help with the mental health crisis facing students in Montana. As a local tax payer please do not implement these rules. Thank you  
Dan Carlson-Thompson

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I am writing to advocate for school children and their need for school counselors.

Suicide rates, drug overdoses, self-harm, anxiety and depression are all increasing in Montana.

How anyone can possibly claim to be an advocate for children while also striving to dismantle a systemic approach to mental health in our school systems is baffling at best - intentionally destructive at worst.

Children must have an appropriate number of counselors in every school and that number must be determined by the state - not individual communities.

Too many parents continue to believe all one needs do is 'get over it' when the wit child is struggling. Our state has consistently been among the highest number of suicide every single year for decades.

Mental health care is health care, and we need to normalize it, advocate for it and save lives - especially those born to parents who would never allow their kid to be treated for these very real illnesses.

Clearly, people are not 'getting over it'. They're dying.

I stand adamantly opposed to Arntzen's proposal to turn mental health care over to local communities.

Do not allow these changes to be implemented!  
Joan Hoedel, MA, BAN, PCC  
Soul Centered Life & Leadership Coaching  
Missoula, Mt. 59801

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Thank you for taking public comment. As a retired educator from Bozeman, I find the proposal to reduce the required number of librarians and counselors baffling. I do not see a stated benefit, or a rationale, for this proposal. In my years, I came to see the importance of these positions in so many, and in such unexpected ways. In a time of life filled with questions of how to understand one's feeling, impulses, confusions and thoughts kids need to have adults who can model, listen and guide. While that sounds like a counselor's role, in fact, the librarian is often a student's closest friend. Many kids find solace in the library's quiet space, the abundance of stories and knowledge that is unique to libraries and, to the point of your proposal, a librarian who really gets a reader's life. Let's not turn our schools into a pipeline of future employees at the cost of robbing childhood of inner exploration of creative, emotional life. These are the qualities of humanity that have always carried us forward. These students will often end up in STEM fields for employment, but they should arrive there are well-read, thoughtful, empathetic people.

Peter Jacoby

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Dear Chapter 55 - Negotiated Rulemaking Committee,  
I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. I am the Executive Director of the Rural Behavioral Health Institute (RBHI), which provides evidence-based suicide prevention programming (Screening Linked to Care, SLTC) to Montana middle and high schools. From our careful assessment of students' mental health, it is clear that kids are needing more mental health support than ever before. Among middle and high school students, 22% of those who have participated in suicide risk screening reported lifetime suicidality. Ten percent reported past-month suicidal thoughts with the intention to die and/or past 3-month suicidal behavior(s). Twelve percent of kids have clinically significant depression symptoms. A similar percentage have clinically significant anxiety symptoms. Students cannot thrive when they are struggling with significant mental health issues. Therefore, we need to be doing MORE to support students' mental health, not less. School counselors play a critical role in making sure students' mental health needs are met. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. Montana recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
Janet Lindow, PhD  
Executive Director  
Rural Behavioral Health Institute

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Dear Chapter 55 Negotiated Rulemaking Committee,  
I am a school counselor in the Big Sky School District in Gallatin Gateway, Montana. I am writing this message in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I believe strongly in the clear delineation of counselor to student ratios in the accreditation standards so that Montana's students have the social emotional, mental, and behavioral health support that they need more than ever.

According to the Montana Department of Health and Human Services report Suicide in Montana, Montana's rate of youth suicide is more than double the national rate (11.9 vs 4.9 out of 100,000). Montana ranks 5th in the nation in suicides per capita for all age groups. According to the 2021 Youth Risk Survey, there is a 380% increase in suicidality in students getting "Ds" instead of "A"s.

School counselors like myself, are tasked with responding to a myriad of crises including when students exhibit anxiety and depression, suicidal ideation, and threats of harm to self or others. School safety is of utmost importance these days, and school counselors play a vital role in prevention and early intervention with youth who are not mentally well.

As educators, we are positioned to see students in need, and connect them to help and support before problems worsen.

Although Montana currently recommends a ratio of 400:1, the American School Counselor Association (ASCA) recommends a School Counselor to student ratio of 250:1. In my school district, there are only 1.75 FTE school counselors with a population of 425 students. We do not have a school nurse, registrar, data processor, assistant principal, dean, counseling secretary, career/college assistant, or many of the other support positions that a larger school and school district may employ. So the ratio for us as a rural school would benefit from being even less than what ASCA recommends.

We would be doing a great disservice to our students and staff by eliminating the counselor to student ratio. I am pleading with you and the other committee members to hear our message as professional school counselors who care about and work with students of Montana on a day to day basis, to keep the School Counselor to Student Ratio in the accreditation standards.

With Regards,  
Janet Martinez

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To whom it may concern,

I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am a mother of two children, one of whom is a first grader at Jim Darcy Elementary. I have an Education degree from University of Montana-Western and currently work as a human services professional at Florence Crittenton Family Services. I see and serve vulnerable families.

Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). And the problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone.

To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students in our state. I cannot state more emphatically how this rule change will impact the most vulnerable students attending the schools in our state with the least resources. Youth with suicidal ideation, Severe Emotional Disturbance and other complex behavioral health needs will suffer when schools are no longer to have counselors on site or maintain what are already paltry levels of service and staffing. Please reconsider.

In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state, most particularly in low income, underserved and tribal areas. Please maintain the current language and standards for the good of all Montana kids and for the future of this beautiful state we call home.

Thank you for your consideration,

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I am writing, as a public school parent, about the deep concern I have for Superintendent Elsie Arntzen's recommended sweeping changes to school accreditation standards.

As a known suicide cluster, our district needs to be adding to, not reducing school counselor and mental health strategies.

In addition, the proposed changes to library standards and elective classes are uncalled for and degrade the public school's role in delivering a quality education.

My two children are prime examples of students who benefit from the quality music education programs in our district.

I encourage the board to remove any consideration of these changes.

Sincerely,  
Sara Busse, Kalispell parent

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain within the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, anxiety, and the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently, the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. At Elder Grove Elementary, I serve 471 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. Our students are unable to properly learn if they are constantly in a state of crisis. We would be going backward, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas. Our nation is in a state of crisis, so we, as educators, need to be cognizant of the effects this crisis is having on our students

I am completely opposed to the proposed changes to 10.55.710. Why would we ever even consider getting rid of something that most people, child and adult alike, need and rejuvenate in during the most unpredictable times of this century?! The changes proposed are wrong, in every way, for everyone. . .

Please think of this before you make a catastrophic change affecting millions of families who depend on this program.

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1.

In my job, I serve 155 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. As a small rural K-12 school that is located 1 hour away from any mental health services, it makes accessing any mental health services that much more difficult. As our enrollment continues to decline, so does our budget. Therefore, we lose staff and additional duties are given. These additional duties negatively impact the amount of time I have for direct services to students individually as well as classroom guidance.

I DO NOT SUPPORT this recommendation at all. Mental health issues and crisis situations ARE ON A CONSISTENT RISE and when in a remote rural area, students/families are not having their needs met. The mental health crisis in our schools needs to be looked at closely.

In order to meet the needs of students and families, additional funding to hire school Social Workers, school based therapists, and additional school counselors. Careful consideration needs to happen in regards to the duties and responsibilities that the school administration is assigning the current school counselors. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
Julie Reinertson

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I'm writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee.

I am the mother of two elementary age children who attend public school in Helena. My oldest child has a disability. My husband is a private mental health provider in town. The needs for mental health support in our community, and across Montana, far exceeds what can be accessed by families privately outside of school. Montana students desperately need school counselors, librarians, and all of "the specials" to remain in Montana schools. All of our kids in the state are so diverse in learning styles and in their abilities to process and communicate life's complexities; we must provide diverse opportunities to reach them all. Cutting back on school counselors and librarians, and staff who teach music, art, and other "specials" is a bad move that will absolutely negatively impact the future of Montana students.

Please maintain the current language and standards. It would be a shame on Montana's public education system for our children to lose these critical supports.

Thank you,  
Jeanette Blize  
Helena, MT

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Dear Rule Making Committee,

I wanted to voice my concerns to the proposed recommended changes to the ARM. My greatest concern is the removal of staffing ratios for school counselors and librarians. I believe these are important standard to keep. I have served on the Flathead County Health Board and worked with multiple of our behavioral health agencies. One of my greatest community concerns is our alarmingly high youth suicide rate in Montana. All the reports and recent surveys indicate that we need more safe spaces for youth with adults present, not less. Specifically with the changes to school counselors, I think that the changes will lead to less of these safe educational spaces for our children.

So apart from the lack of healthy spaces the rule changes also seem to be counter intuitive to our need make sure that as many Montanans possible can connect to our workforce. The elimination of requirements for not only accredited librarian staff but also to the removal of foreign languages, work studies, music and arts

requirements is deeply concerning. These programs, especially for middle school and younger are proven to increase skill learning for these students when they become adults. When I go and talk to local manufacturers and engineer firms here in Kalispell, they let me know that these cognitive learning skills are what they are looking for and removing these requirements is short sheeting Montanans from getting the future good jobs that we are bringing to Montana.

Please consider keeping the ARM standards as they are, keeping our kids safe and preparing them to enter the workforce.

Sincerely,  
Kyle Waterman

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. This is my third year working as a school counselor and I immediately noticed the prevalence of students' mental health challenges such as suicidality, depression, and anxiety. Since then, the pandemic has increased mental health concerns as well as school truancy and poor academic achievement.

Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 319 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school. I frequently feel as though I do not have enough time in the day to meet with all the students who request to meet with me each day. I cannot imagine having more than 400 students on my caseload. Students would surely not receive the mental health support that they so desperately need. I strongly encourage you to keep the school counselor to student ratio language in the accreditation standards.

The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff.

Sincerely,  
Mikayla Tilstra

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Hello,

I am writing to express my opposition to the changes proposed by Superintendent Arntzen to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905.

I strongly oppose eliminating the required ratios for school counselors in Montana schools, as this rule change proposes to do. This proposed change would gut the support vulnerable young Montanans have in our public schools. As a K-12 product of Montana public schools, I wholeheartedly hope we can provide the best education and support for students, including the best academic support but also mental health support. As you must know, public schools in our communities are often the only place a young person can access mental health services, and are more important than ever in the currently challenging circumstances where stress and depression are rising.

Furthermore, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state, particularly in low income and tribal areas. Please maintain the current language and standards for the good of all students. Again, public schools form the heart of our communities and should be vigorously funded for the benefit of young people and for the benefit of our entire state.

My best regards,  
Ann Makich

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Afternoon.

I am writing in disagreement to the proposed rule making set forth by Elsie Arntzen.

Schools need more access to in-house counselors, the Board should not allow for private practice to pick up the needed gaps in staffing. Students need more on-site staff because they are able to bond with counselors they see everyday and form trust. School counselors allow for the student to stay in a familiar place, not have to leave school or have parents take them after school. In-house staff see their daily behaviors and are able to evaluate their current state for immediate concerns. School counselors are part of the student educational plan and can help tailor traditional teachings in order to help the students specific needs.

Further the school counselors are a specific line of training. Giving the private sector, which is already overturned after COVID as well, more clients while not specializing in kids or kids in different age groups like school counselors. This proposal allows for other unqualified staff to supplement the professionals. That can have serious recourse for a student in crisis. Current counselors are already over taxed with a 400/1 student ratio. The schools need more of them, not less!

Thank you for your time. Again, I do not support this proposal.

Leslie Holz

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. I am currently a graduate student about to finish my school counseling program. From my experience as an intern in the schools I have often seen my counseling supervisors called out of meetings, groups, and class lessons to address crisis response at the school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Sincerely,  
Jenna Davis

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Hello,

I am writing today to voice my opposition to changes in ratio rules for librarians and counselors, as well as proposed changes to middle school electives. These are critical positions, and proposed changes put them at risk. Please do not initiate these changes.

Caleb Lande  
Billings

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I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor

academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 270 students. I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas. I work on the Fort Peck Indian Reservation. This will hurt ALL students but especially our Native American students.

Sincerely,

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I am writing with sincere concern as to why our Montana schools would be proposing a ratio cut for school counselors when in the wake of covid we have more student mental health issues to deal with than ever before.

Families have been stressed to the max and will continue to be stressed as our economy falls into a recession. Of course this stress impacts the health and well being of our students.

If there is money to be saved by the state, we believe that funding cuts should be found elsewhere.

Thank you.

Sincerely,

Robbie and David Mawyer

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Greetings,

It has been brought to my attention that there is a proposal to minimize the amount of School Counselors per students in an individual school. The language has been simplified to Each "school system" (what does that even mean?) must provide a school counselor as opposed to requiring school districts to have a ratio of one school counselor per 400 students. This proposal is dangerous and borderline unethical. There is a need for School Counselors in each school, and as it is in Montana, there already isn't enough support for the attending students.

The ratio of 400:1, is already incredibly low. The recommended ratio according to the American School Counseling Association is 250:1. This is recommended for a reason. Between recovering from a pandemic and the exponential growth of mental health disorders, how is a School Counselor able to provide the emotional/social and academic support students need if the ratio were to increase to beyond 400:1?

As we move into 2022, managing the mental health of our students falls on the plate of the School Counselor. Daily, students need support managing their mental health symptoms to include suicidal and homicidal ideation. School Counselors accomplish this through providing counseling groups, monitoring individual students' mental health, and providing individual counseling. For many reasons, accessing mental health care isn't a possibility for every student, and even the students who are under the care of a mental health provider, still require support from the School Counselor.

In addition to providing responsive mental health support, School Counselors are often case managing 504's, providing classroom lessons, seeking peer consultations, developing classroom lessons, coordinating with clinical providers, attending IEP's, facilitating various student/teacher meetings, developing and monitoring their respective School Counseling program etc. It makes me wonder, how could an ethically-minded school counselor even continue to provide counseling services for a school district which overloads them with student needs?

As a school counselor, how could I ethically justify working for a district where I am unable to assure the safety and well-being of my students due to having too many students assigned? I would be forced out even if my

position were one that was kept. When it comes to the safety of our students, it is concerning that this is even proposed.

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Dear Mrs. Loveridge,

I write in staunch opposition to the state superintendent's motion to remove staffing ratios for counselors in our public schools.

In the past year and change, [REDACTED] have buried 9 teens who have died by suicide.

[REDACTED]

Montana has twice the teenage suicide rate of the rest of the nation. We cannot skimp on these resources, whether in rural or suburban schools.

I run a small nonprofit, I know what it takes to meet budget. This is not the sacrifice you want to make for the sake of money.

Your in Christ,  
Charlie Knuth

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It is with grave concern that I have read the proposed changes. Given the dire need for mental health services for students, if anything, the ratio of counselors should be even higher. It would be a serious mistake to water down requirements, reduce support and lessen the availability of qualified, in-house staff available to counsel students. All too many are vulnerable to academic disruption, our burgeoning housing crisis, and substance abuse.

Sincerely,  
Jonathan Nehring

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Hello – I was hoping to receive the link to view the meeting today at 3:30 regarding the School Counseling Staff Recommended Ratio Cut.

Additionally, I find this measure to be completely unreasonable and unfair to the children and students of the community. Mental Health is at an all time low in this country. Especially after an overwhelming and unprecedented interruption of normality with the pandemic. I would encourage Elsie Arntzen to understand the public opinion of the parents and students themselves and listen to the impact this will be making on their livelihood prior to making such a rash and frankly uneducated decision. What is the rationale behind this? Does she not understand that there is a mental health crisis in the United States and heavily in Montana right now and in doing this she is just blind to the reality of her community currently? Does she think it is reasonable for one already overworked and underpaid counselor to now be responsible for triple the students they are currently supporting?

One of my personal friends is a student counselor in a Great Falls public school and from her experience, this is a complete disservice to the children. Kids rely on her every single day. They seek her out for advice, comfort, and just a shoulder to cry on or a body to hug. Many of these kids are not getting the love and care they need at home. I understand that one of the arguments advocates of this measure are making is that the counselors do not have adequate credentials to provide this service to the students. Unfortunately that is a gross misconception. From my understanding, each of the counselors must be certified and educated in this field to even be considered for a counselor's position. Not once does a counselor claim to provide the students

with professional PHD phycologist advice. If this is necessary and required, who will be paying for the salary of these overly qualified professionals, that are already in high demand and low quantity in this current state? My mother in law is a certified PhD phycologist and it is impossible for her to take on additional clients at this time due to her current workload.

I am curious as to how Ms. Arntzen proposes to support the cut of counselors. Will there be government funding to subsidize children's therapy with a certified psychologist? Will she facilitate the support and advocacy that children will need when they come to school crying because a tragedy happened at home and their teachers don't have the tools or time to assist that child with the support and love they require? Where will this additional funding be going if this cut is made? Are these funds going to be allocated to a cause that will support the students and children of the community?

Any response is appreciated.

Thank you,

Kimberly Wilson - Concerned Citizen

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You cannot possibly think this is a good plan. Someone needs to get their butt into these Montana schools and SEE and HEAR and FEEL what is going on with staff and students. This is the most dire I have ever seen our schools, and you want to TAKE AWAY? What is this woman thinking? This is disgusting. Shame on all!

Shelly Bailey - 22 year veteran

Havre Middle School

English Department

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Dear Chapter 55 - Negotiated Rulemaking Committee,

I am currently a school counselor at CS Porter Middle school and I writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. In my job, I serve 340 number of students. I feel stretched thin and unable to accomplish my job requirements due to the mental health crisis kids face every single day. I am leaving my position after this year due to the stress and inability to help them all. There is only two of us here at Porter. There is no way you would be able to retain a full-time school counselor with a caseload 600 students, it would be impossible.

I am often called out of meetings, groups, and class lessons to address crisis response at my school, this has been on the rise over the last decade without a change in our student to counselor ratios. We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff. Eliminating the ratio would eliminate access to mental health, especially for rural areas.

Please do not do this.

Sincerely,

Jess Conner

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Dear Chapter 55- Negotiated Rulemaking Committee,

I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the school counselor to student ratio. I grew up in Montana, and am currently work as an RN in Bozeman, and am studying to become a Psychiatric Mental Health Nurse Practitioner, (PMHNP). I have seen first hand how important the role of school counselor is. They help to intervene in cases of abuse. They notice red flags that could be indicators of violence to oneself or others. They advocate for additional academic support. They act as a positive, trustworthy adult, when there may not be other positive role models.

I strongly believe that the counselor to student ratio should remain within the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. I have seen a marked increase in the mental health challenges faced by our youth. We should be doing all we can to meet the mental health needs of Montana's youth to help ensure their successful futures, rather than decreasing resources that are already spread thin. Please help to ensure access to mental health care, especially in rural areas by maintaining the current ratio.

Sincerely,  
Fraser Ball,

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Hello. I am writing today to ask for requirements for school counselors and their ratios not change. I am a therapist in Billings and school counselors are the first line of defense to support kids and families. Community therapists cannot absorb the students that will need support.

Thank you,  
Angie Buckley

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To whom it concerns,

Please, consider adding more counselors in MT schools NOT less!!! I am a regular school volunteer in Billings, MT. Our students need to have a school counselor available to them at all times. Because they are needed so much I feel that our school would hugely benefit for a second counselor. Let's be a part of the solution, not the cause of the problem.

Thank you for your time .  
Austin Andersen

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Good Afternoon,

I have so much to say, but first let me start by saying what a punch to the gut it is for this being taken to a vote during Mental Health Awareness Month!

Coming from a small school in Montana, we thankfully had a school counselor. She not only guided each of us through the emotional turmoil surrounding growing up going through teenage years, but also guided us through college applications, scholarships, job assessments and provided us with resources and availability that she was there when we needed her.

Our school counselor was there when I couldn't keep it together in class after my beloved family dog died. She was there when my friend's family was going through a messy divorce. She was there when my grandfather passed away. She was there after someone found and turned in my poetry about self harming and thoughts of suicide. Some things you can't or don't want to go to your parents for, and growing up in a small town there were no therapists or counselors outside of school.

Counselors didn't have you in class, they didn't yell at you for being quiet, didn't punish you with detention for too many tardies, they were unbiased adults that were simply there for you when you needed and always looking for help and kept an open mind. Without school counselors, what is the alternative? What is the solution? If the goal is to cut funding and use the money elsewhere, what is more important- to save money or lives? Some of these counselors are doing just that!

These kids may not have access or money to seek outside help. There are several problems with this specifically. As a child, you don't want to tell your parents you are having terrible thoughts or their divorce is hurting them, etc. You don't want to ask your parents for money to seek outside help. Your friends are kids themselves, they can be a sounding board but they can't offer the same advice as an adult and trained professional. Nevermind the fact that if these kids have parents like I did (and I love my parents) but they may turn their nose up to 'therapy' or seeing a 'shrink'. Their parents may tell them to suck it, life is hard, deal with it, figure it out. Where and who do children go to then? To cut counselors out of any school whether they are 50 kids or 500 is incredibly insensitive and heinous. These kids need someone to go to they can trust, someone who is there to listen, help and not cause further hurt, and who they aren't afraid to talk to.

I believe people are naive to the fact that kids experience a variety of problems at all different ages and without the mental capacity or maturity, it may be hard to get through these things. For the love of all things holy, counselors should not be removed from school, if anything, add access to more, encourage people to use them more. School Counselors save lives, how many lives will the state take away if they remove counselors from smaller schools?

Thank you,  
S.M.C.

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Dear Tristen and Who it May Concern,

I must ask you to please reconsider your recommendations regarding counselors in our public schools. [REDACTED] [REDACTED]. The kindness and expertise of the school counselor was the first helping hand that reached out in school to hold hers. She has helped other kids and teachers understand what my daughter is going through, and provided myself with the reference and advice needed to get her additional help outside the school system. I, on the other hand did not have such access in a small MT school. I had no adults to talk to about my own struggles academically and emotionally. I was bullied. I missed dozens of opportunities in childhood that could have led to a better life. Please don't take away this crucial step in the intervention process for our children. There are so many vulnerable children and teens in our schools, who don't know where else to get help, who think the world doesn't care about them. Don't take away their chance to get help and live a better life, please.

Sincerely,  
Sara Mawhinney

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Dear Tristen and Who it May Concern,

I must ask you to please reconsider your recommendations regarding counselors in our public schools. [REDACTED] [REDACTED]. The kindness and expertise of the school counselor was the first helping hand that reached out in school to hold hers. She has helped other kids and teachers understand what my daughter is going through, and provided myself with the reference and advice needed to get her additional help outside the school system. I, on the other hand did not have such access in a small MT school. I had no adults to talk to about my own struggles academically and emotionally. I was bullied. I missed dozens of opportunities in childhood that could have led to a better life. Please don't take away this crucial step in the intervention process for our children. There are so many vulnerable children and teens in our schools, who don't know where else to get help, who think the world doesn't care about them. Don't take away their chance to get help and live a better life, please.

Sincerely,  
Sara Mawhinney

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To Whom It May Concern

Hearing the news about making cuts with school counselors across the state is extremely concerning. We are just starting to see the effects of what the pandemic has done to the mental health of our students, parents, and staff. How can this even be considered? Our schools are in desperate need of more mental health professionals, not less! Services outside of schools are impossible to assess due to the lack of availability.

Appointments to get into a counselor can be two months out. In the meantime, our school counselors are the only support. We need counselors who qualified educated professionals that are ready to aid in some of our more concerning mental health issues that are growing a record rate. I would suggest getting into more schools and talking to teachers, parents, administration, and students before making such a reckless change.

Bobbie Jo Naber  
School Counselor  
Havre Middle School

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Hello,

I want to voice my strong opposition to the proposed changes being made to Chapter 55, especially those recommendations the cutting of student access to counselors, librarians and middle school credit requirements for the arts and CTE programs. We should be giving our students every opportunity to have a good education, not cutting programs or restricting access to information and valuable services. Shame on Elsie Arntzen for even recommending that these changes be made as they will do nothing but hurt students and further deter teachers from wanting to teach in our state.

I hope that the decision makers actually take into account public comment when considering changes that will have such deep ramifications on students in our state.

Thank you,  
Stephanie Clewis

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Dear Mr. Loveridge,

I am writing in response to the proposed changes to the the ratios for librarians and counselors in our schools and the wording for curriculum.

As you know reading enriches communities. For youth and students reading starts a life of knowledge, growth and exploration. I was blessed with a mother that read voraciously, something I passed down. But some children have their first experience of books in school. The need for school libraries is obvious but perhaps we aren't as clear about the need for a librarian. That person is really the gate keeper of children's first (and following) exposure to reading. It is without a doubt one of the most important positions in the school.

As for counselors I can't imagine why there would ever be a disagreement that every school needs them and ratios need to be maintained to assure their continued position. We all know the statistics for young people and mental health. And navigating today's world of school combined with life isn't getting easier.

I am unsure the consequences for the language changes. If it is simply to allow schools to cut curriculum I am concerned. As we have seen in the Billings school district local schools are not always concerned about quality and equal education when it comes to worrying about money. I understand there are concerns about taxes but there needs to be standards set by the state. I shouldn't get a better education in a "rich" community versus a worse education in a "poor" community. It is imperative the state intervene for the best of all children.

Thank you for you time.

Sincerely  
Shelley

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As a retired police officer with 20 years of service, most of it involved with investigating crimes against children, sexual and otherwise, I can assure you children do not raise their hands in math class and disclose that the father is touching them inappropriately. By removing trusted adults children can speak to privately the school district removes a thread of a lifeline that might be all that neglected and abused children have. With the local economy becoming more stressful, cost of living (especially housing) spiking, with no corresponding increase in income, the abuse and neglect of children will increase. It always does when stressors on adults increase.

Please do not remove these trusted adults from the school.

Lt. Kris Sell (retired)  
Juneau Police Department  
Juneau, Alaska

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Grew up in Columbia Falls, Class of 1986, now retired in Columbia Falls

The proposed changes to counseling and other areas would damage the children in our state. Please do not enact those proposed changes. Thank you.

My eight year old grandson is a student in Hamilton Montana public schools. I have been actively involved in his school life. Some of the changes proposed in our state's educational standards by the Office of Public Instruction appear to weaken the education offerings to our state's students. I would highlight the apparent weakening of requirements for library and media services, counseling services and specific elective programs. If the rationale for these changes is driven by needs of smaller schools, I suggest OPI assist on a case by case basis rather than degrading requirements of all our schools. Strong public schools are basic to democracy.

Warren Neyenhuis  
Hamilton, MT 59840

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Hello there,

I was disappointed to learn about Superintendent Arntzen trying to reduce the required number of school counselors. My school counselors at Polson High School were fabulous and helped me get a bunch of scholarships which ultimately allowed me to attend college and have a fruitful career.

I strongly encourage the department of education and the state government to fully fund and support school counselors, not reduce their numbers.

Thank you,  
Nation Garza

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I cannot believe at this time of educational crisis there is a plan to reduce Librarians and Counselors at our schools. Why reduce? In Helena they just proposed a significant pay increase in the administration levels while schools are struggling with stressed students and teachers, challenges to the library content, understaffing and poor maintenance. And now cut a part of the school experience that helps students get through these trying times.

I am so sorry my letter is late, possibly the decision has been made but could you at least explain the reasoning behind this apparently poor plan?

Laura B Gerlach

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With the increasing needs of students in our state, the numbers of counselors in our schools and music/arts staff should be increased, not decreased or put at risk. These recent proposed changes by the Superintendent must be opposed. They are not in our students' best interests.

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It has just been brought to my attention that Superintendent Elsie Arntzen is proposing to change many Montana school accreditation standards. After looking into her suggestions, I have some major concerns. First, as a parent of two children in the Bozeman Public School district, I am aware of a growing gap in reading and writing skills within our district. Our district is working to create solutions to address this inequity; decreasing the number of librarians in our schools will undermine these efforts and instead result in even lower reading and writing skills. My children have benefitted immensely from exposure to music and the arts throughout their educational journey. I am horrified to hear of the proposed changes to these programs. My daughter is a graduating senior, she began playing the trumpet in the band as a fifth grader, and has enjoyed playing in band, jazz band, pep band, and as an occasional guest artist in the symphony ever since. Interestingly enough, she was just awarded the 2022 US Presidential Scholar award (one of three from Montana), based on a series of selections essays one of which tasked her to discuss a creative work that has influenced her view of

the world. She chose to write about a piece she had performed with the symphony, Dvorak's New World Symphony, and the lasting impact this musical piece has created. She would never have picked up the trumpet and enjoyed this fulfilling musical journey (a major component on her path to being recognized as one of the nation's top students) without the public school music programs provided in elementary and middle school — every student should have access to these subjects. In addition, I am quite flabbergasted to see that there is a proposal to gut counseling services — especially at this time when due to COVID more children than ever are needing these services. I know I do not need to remind you about the statistics for suicide in our state, if anything we need MORE counselors in our schools. College and career readiness requires more than reading, writing, math, and science. It requires engagement — elective courses like foreign language, bio-med, engineering, auto shop and more help to engage students in creative and practical ways. These courses keep students motivated and engaged in learning which ultimately leads to improved graduation rates, as well as readiness for life after high school. Finally, I have major concerns about the plan to eradicate FTE teaching positions in general. We need to find different solutions to address the teacher shortage that do not compromise a student's learning opportunities. We are Montanans, we can do better than this proposal.

Sincerely, Sarah Bothner

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I would like to address the proposed changes to accreditation standards. As a retired high school librarian and an ACT data analyst, I am opposed to the blanket decimation of our K-12 educational system. These changes defy logic and any person interested in maintaining public education would certainly oppose these recommendations. Counselors and librarians are integral to the education of our youth as are solid curriculums and required credits in music, the arts foreign language, and career, and technical education. I have spent 5 years analyzing ACT scores for two of the largest school districts in Montana. I can assure you that we will short change our students and jeopardize their ability to continue their education if these proposed changes go through. If I had more time, I would elaborate. Respectfully, Joan Meyer

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I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school counselors to students in Montana schools. I propose, rather, a change to match the National recommendation of 250:1. I also oppose the larger changes removing much of the specific requirements for various staff positions and programming requirements. While I know that it is difficult to hire staff in rural parts of Montana, it is important that our state put more resources behind education - not gut the existing requirements. This would put Montana students and Montana's future at risk.

Thanks, Sara Callow

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Good morning! It has come to my attention that Ms. Elsie Arntzen has proposed eliminating student staff ratios for counselors and librarians. I would like you to know that as a teacher and a mother I am adamantly against these rule changes. If this is an attempt to help mitigate our teacher shortage please know that both these positions require advanced degrees and many of them may not be in the classroom if these changes happen. In our changing world, counselors have played an ever increasing importance in our schools and with our children. By eliminating the number of counselors available it will be detrimental to the mental health of our schools and students. This proposed rule change would allow for the same number of counselors in an AA school and C school. I am not sure how it makes sense to allow for the same number of counselors whether there are a couple hundred or a couple thousand students. I certainly hope that the implications of this rule change are considered when making this important decision. As for librarians, students need an opportunity to have access to a staff member who has made it their priority to instill a love of reading into our students. Library allows for so much beyond instilling that love of reading. Library also allows students to learn and apply research and writing skills. These are skills that will help our students in high school and college. When making this decision please consider the long term implications this will have on our students moving forward. I have outlined just a few of the reasons that I feel these rules changes are not what is best for students and schools. This is not what is best for Montana students. As you are making these decisions, please ensure that you have their best interest in mind. If you have additional questions, please feel free to reach out to me at any time. Emily Winslow

Please let Elise know that I am totally against her recommendations for schools, especially those concerning libraries, guidance counselors, music and more. It almost seems that she never worked in a school to recommend these changes!! Kathy Dufresne

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I reject Arntzen's proposal. Please vote no. Please do not eliminate the ratios for school librarians and school counselors. Please do not eliminate elective programs in middle schools, student access to music, visual arts, and career education, among others. Thank you, Helena Koelle

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Please do not let Ms Arntzen gut our schools by diminishing vital staff in her proposed folly!!!Especially during these societally challenging times, stable counselors and librarians are essential to the wellbeing/growth of our students! Thank you! Amy Knutson

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When the Negotiated Rule Making Committee meets tomorrow to vote on Arntzen's recommendations for school accreditation, I ask that you reject her suggestions for counselor requirements and middle school electives. According to the Montana DPHHS, Montana has the 3rd highest suicide rate in the country and suicide is the 2nd leading cause of death for people ages 15 - 24. I can't understand why, given the current mental health crisis among our kids [aap.org], the superintendent of public instruction thinks reducing kids' access to counselors and mental health professionals is a good idea. These services are expensive, and school counselors are often the only affordable resource for kids who need help. Instead, let's move the student/counselor ratio in the other direction. As a parent of a 7th grader and a sophomore in Belgrade schools, I ask that you not cut elective programs or schools' ability to provide them by lowering standards and agreeing to Arntzen's proposed changes. Electives help our kids to grow into well-rounded adults, and they allow kids to explore a variety of talents, so those who do not excel at academics or athletics can also be successful. I'm extremely concerned with the direction Montana's educational system is heading. Let's help Montana kids succeed by providing more resources for them and prioritizing education instead of limiting their options as Arntzen suggests. Thank you, Sarah Cairoli

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As a mom of a public school student in Montana and as a former grad, I find the proposed school requirement changes troubling. First, school counselors are important in our school systems. According to the university of Montana, youth in Montana are twice as likely to die by suicide than any other state, and your new changes want to take a great resource from kids to help prevent more suicides. Counselors need to be in all levels at school starting in elementary to normalize getting help. Not requiring art, music, shop and athletics does not support our youth. If we lose those then the kids that enjoy them and only go to school for these will suffer emotionally. Please fight for what we have and don't want to lose. Linda Sorensen

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Please reconsider your across the board approach for elimination of school librarians and counselors. Rural schools may benefit from this but more urban institutions probably would not.

Superintendent Arntzen's recommendations for the sweeping changes in the Accreditation Standards for middle school and junior high school programs in Montana will set public education back decades! We have worked very hard to see that all schools, regardless of size and budgets, meet the same standards to benefit all students across the state. The watering down of these standards will not guarantee an equal quality education for middle school and junior high school students in Montana. The inequities caused by the lack of specific standards will only result in vast differences and unequal opportunities in our school systems.

Please do not accept these changes in our Accreditation Standards!

Professionally yours, Wayne Stanford, Trustee Lone Rock School Stevensville, MT

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As a mental health clinician I would like to voice that superintendent Arntzen proposed changes will negatively affect mental health of Montana Youth. We are already struggling with huge suicide rates and rates of anxiety and depression in Montana youth. Let's not make it harder for them as they are already struggling!

I would like to register my objection to the proposed changes to education requirements. These changes are not in the best interest of Montana's students Shirley Chesterfield-Stanton Paul Stanton

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Our children need qualified librarians and counselors. I am strongly against reducing the number of both !!! I want my tax dollars to support learning and emotional stability. Do NOT change the ratios. Pam Boyd APRN,

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Your proposed changes, outlined here [[I.facebook.com](https://www.facebook.com)], are a disgrace to the Montana Public School system and will desperately underserve our children for years to come. At this monumental moment in the United States and the World, it is more important than ever to provide resources for critical thinking as well as resources for health and wellbeing. By cutting down library staff and not having a clear expectation for filling the position, there will be a lack of support for the curious minds, for independent thinking and to support the curation of critical thinking- including how to fact check. We have already seen numerous ways this can play out in recent years (see 2020 election results, see Covid-19 vaccinations), and thus it is more important than ever to support young children and young adults to think for themselves and learn how to independently verify information. Libraries are more than books- they are an extension of the classroom. By cutting Library staff, you are cutting teachers out of the school system. As for changing the standards for counselors: this will have a ripple effect far beyond our state's borders. By striking out the minimum number of counselors that are required for each school system, there is a potential for a school system of 2000+ to only have one accredited counselor. This will allow too many students to slip through the cracks in our already broken system. Mental Health, Suicide, Homelessness, Abuse and more will become unattainable to handle and therefore will allow our children and our community to suffer. We need more resources for these students- not less. We ask ourselves why the kids of America are apathetic to many causes, but it is clear that the spreading of thin resources is no help. Please rethink the redlines of this proposal. Have minimum requirements for employment for these positions. Yes, finding workers is hard, but do not let our children fail because of our lack of duty to do our own jobs. Signed, A mother of two, who will soon be enrolled in the Belgrade School District, Molly Lammers

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Today I read about some of the changes that are being recommended in regard to school accreditation in Montana from the Office of Public Instruction and I am writing to say how worried I am about the future of public education. I am particularly concerned about changing the ratio of librarians in schools. All through my son's education in public schools in Montana, I volunteered in public school libraries and I know how important libraries are to students of all ages! And how hard the librarians work with the children and youth to make sure they know how to access good information, do good research and give students access to good literature. I hope we, as a state, can find a way to fund and support librarians in all our schools! Amy Carter Billings, Montana

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Superintendent Elsie Arntzen is "fixing" what isn't broke. STOP!- Wade Wade Harper

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I am writing this letter on behalf of the faculty of the Counseling Department at the University of Montana in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor-to-Student ratio. I strongly believe that the School Counselor-to-Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. Currently the national recommendation (per the American School Counselor Association) for School Counselor-to-Student ratio is 1:250; Montana recommends 1:400. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all

advocate for increased mental health services in our schools. Eliminating the ratio would eliminate access to mental health, especially for rural areas. As evidenced by peer-reviewed research studies, such as "Measuring the Impact of School Counselor Ratios on Student Outcomes" (Parzych, Donohue, Gaesser, & Chiu, 2019), [schoolcounselor.org] lower School Counselor-to-Student ratios result in higher test scores, lower absenteeism rates, and less mental health crises that go unaddressed. Students with access to licensed school counselors experience less barriers to emotional and mental health support, more rigorous post-secondary plans, and an overall increase in school climate. Considering the outrageously high rate of youth suicide in Montana (3rd highest in the United States), addressing the mental health of our students should be the priority of all school stakeholders, particularly those elected to make decisions that impact our K-12 youth. Research can only paint a partial picture of the value of school counselors and their work in school settings. In addition to being a school counselor educator, I am also a seasoned school counselor, now serving in the role of the first-ever 0.2FTE school counselor at Woodman School, a K-8 with 45 students. I can attest to personal stories of students and families accessing myself or my school counselor peers that resulted in youth receiving the support they needed in often dire situations or in prevention and early intervention of mental health crises. My current caseload of 45 students at 0.2FTE equates to a 225-student caseload for a full-time school counselor. My days at Woodman School are packed with preventative guidance lessons, student mediation, family outreach, and responding to individual student needs, which often takes up the bulk of my time there. For most of my students, I am the only mental health professional they have access to in meeting their most extreme needs. Without my role at Woodman, these students would go without the option of mental health services in that capacity. It is outrageously uninformed for Superintendent Arntzen to make the recommendation of eliminating the school counselor-to-student ratio. This hasty decision, not in alignment with the legal protocols of considering expert task force committee recommendations, will have dire results for our K-12 students across Montana. I sincerely hope that Superintendent Arntzen takes these important factors and her constituents' voices into consideration to redact this decision.

Sincerely, Emily Sallee, Ph.D., LSC, PCCLC, BC-TMH  
Assistant Professor, Department of Counseling, University of Montana  
Executive Director, Montana Safe Schools Center, University of Montana  
Advocacy Chair and Board Member, Montana School Counselors' Association  
Professional School Counselor, Woodman K-8, Lolo, MT

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I hope this finds you well. I'm having a difficult time finding the right words to discuss the cuts that Elsie is proposing. I'm a middle school counselor working in a smaller district outside of Missoula and while I love my job, it is not without its challenges. Almost every week I am administering suicide risk assessments and I have made countless referrals to higher levels of care. At the end of each day, I leave with a list of students I did not have enough time to check-in with. The need for support, mental health care and social/emotional learning is insurmountable. Not to mention, our school has 2 CSCT teams who also handle bursting caseloads. If we are to lose CSCT support in our schools next year (which is likely), I am confident in saying that my service alone will not be enough to best cover all the needs of all my students. I leave school every day worried for my students - their families are suffering, people are losing their homes, and mental health needs are at an all time high. During this time, with increasing suicide rates, I CANNOT imagine our kids losing access to resources. The thought that this is even being proposed is an absolute heartbreak. Please, please speak up for Montana CHILDREN, they deserve more! Thank you. Julie Stinton

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Attached please find a letter to present to the Chapter 55 committee meeting today regarding Superintendent Arntzen's recommendation to eliminate the school counselor to student ratio. I am in opposition to this recommendation. I see it as extremely detrimental to the mental health of our youth.  
Sincerely, Cathy J. Frye

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I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately

need. In the last two years, I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety, as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana's recommendation is 400:1. In my job, I serve 282 students in a small rural K-8 school in the Flathead Valley, an area where we have had a significant increase in youth suicide and suicidal ideation in the past year. I am often called out of meetings, groups, and class lessons to address crisis response at my school, and this need has been on the rise over the last decade without a change in our student to counselor ratios. I have had over 80 individual student referrals this year alone (~29% of our student population.) This number does not account for multiple referrals on the same students, which also happens frequently. As part of my counseling program, I have taught nearly 250 classroom guidance lessons this school year, including topics on making safe and healthy choices for Red Ribbon Week, social skills, emotion management, problem solving, conflict management, empathy for MLK Day, drug and alcohol awareness and prevention, bullying and cyberbullying prevention, suicide awareness and prevention, safety rules including safe and unsafe touches, and career exploration. I have also managed positive interventions and data collection school wide as part of our PAX Good Behavior Game implementation, I ran a structured recess over 15 weeks for students with behavior challenges, and I helped facilitate transitions in our school including organizing and facilitating both a middle school orientation and registration for our 4th grade students, freshman orientation and registration for our 8th grade students in three different high schools, and screening for our Kindergarten Round Up. I am also a member of the Flathead Valley Quick Response Team and have provided crisis response to a neighboring school this year after their school community suffered a tragedy. In addition to my full-time counselor duties, I also serve as the appointed Title IX Coordinator, Homeless Liaison, and Attendance Officer for our district. As part of these extra duties, I have done multiple house calls this year to help students get to school, as well as helped organize ongoing food support and holiday support for students and families in need in our school community. These needs are going to continue to increase as we see more students and families moving into the Flathead Valley and our school community. In Montana, we recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. We would be going backwards, instead of meeting the needs of our students and staff if Superintendent Arntzen's recommendations are put into place. Eliminating the ratio would eliminate access to much needed mental health resources and support for Montana's youth, especially for schools in rural areas. Sincerely, Jackie Bourriague, M.Ed. School CounselorCayuse Prairie School District #10

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904 and 10.55.905. I believe that if passed, these changes would have a deleterious impact on the students in our public schools, and also the communities across our state. I believe that if passed, these changes would restricting already sparse access to mental health and library services in our state which would negatively impact citizens of Montana for years to come. Please reconsider these changes and maintain the current language and standards for the good of all students. Thank you, Kevin Murphy

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I am writing to express my concern about Ms. Arntzen's proposed changes to high school and middle school accreditation standards. It is my hope that the Montana Board of Education denies these proposed changes. As an educator of 31 years, I believe these suggestions eviscerate the infrastructure on which effective educational practices are built. To remove supports for mental health by changing the ratio of counselors (to students) when depression, mental illness, and suicides are sky rocketing is appalling. This generation has faced more trauma than any other, and it continues. As an educator for 31 years, I see the manifestation of this trauma. Our school counselors work tremendously hard to create safe, healthy environment to support all students especially those who are struggling. Our mental health services are already understaffed for the needs in our schools. To reduce services would be devastating to our students. In addition, research has shown that reading ability is linked to future success or failure in life. Some studies have even discovered that the ability to read can be a predictor to be used to calculate future prison growth. If our librarian ratio is altered, this will dramatically change the way students access and learn the skills to be effective readers. In addition,

librarians are integral in educating our students to be critical consumers of knowledge. This skill is paramount when we are constantly bombarded with information that can be dangerous to our children. Librarians have a specific skill set that provides students and teachers information and skills to enhance reading success that makes them invaluable and irreplaceable. Finally, striking the academic language that sets high standards for specific subject areas in middle school is egregious. As educators, we prepare our students to be college and career ready. Removing the requirements for English, social studies, math, science, health enhancement, visual arts, music, career, and technical education is setting our students up for failure. Our students are our future leaders and our country's work force. Their successes and failures will greatly affect our economic and political stability. Removing these standards is unacceptable. A well-educated community is the key to a healthy, collaborative, productive future for our country and our state. To completely eliminate the standards for our students at any level, and to remove crucial elements of literacy and mental health, destroys the system and fails our kids. I ask the Montana Board of Public Education to deny Superintendent Arntzen's proposals. These will denigrate the system and are an insult to our hard-working educators, families, and students in Montana. Thank you for your time. Best, Theresa Vedovatti

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On behalf of MFPE and its members I requested a link to provide public testimony but realize time for testimony is limited. In the event I am not elevated in the Zoom session due to limited time will provide a brief record of MFPEE'S strong opposition to Superintendent Arntzen's recommendations that you will be reviewing today for 10.55.709, 710, 901, 902, 904 and 905. In each case, we would recommend that recommendations not be accepted. The students of Montana will not benefit if these recommendations are implemented. In all cases, it would be better to leave the standards untouched. The result of the proposed rules would very likely be a reduction in the number of school counselors and library media specialists in all schools with very limited ability to track what services are provided to students attending our schools. Many electives that help provide our students with a quality education would very likely be eliminated. I would urge a more careful analysis of the type and degree of services that are currently offered under current standards before finalizing any recommendations. I have had the opportunity to observe the meetings of both the School Quality Task Force and the Chapter 55 Rule Making Committee and these broad recommendations are not in line with the conversations that of task force members. Protect Montana's quality schools on behalf of Montana's students and to provide reasonable working conditions for our Montana's accredited schools' staff. I would be glad to discuss any of the issues. Beset regards, Diane Fladmo Director of Public Policy MFPE

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My name is Jacqui Dinius and I am a 2nd Grade teacher at Whittier Elementary School in Butte, Montana. We have 350 students in our k-6 school. We have only one counselor to service all of these students. Granted all the students in our school do not need individual services, but our counselor is very prevalent in our school. The students know that they can go to her for any of their needs. Our counselor services a great number of our students in our school meeting with them individually as well as groups. She presents every classroom in our school a program called Classroom Guidance. It teaches students skills to cope with problems they encounter whether in school or outside of school. She also does a program that we call character club. This program teaches students that it is perfectly fine to be you and not like someone else! The bottom line is that every single student in our building is touched by our counselor either directly or indirectly. We desperately NEED our counselor in our building for everyday occurrences. This day and age it is so important for students to have someone to turn to when they are at school. For so many students, school is their safe space. Our counselor is able to confirm that by being so involved in their lives, ensuring them that they are safe at school, and even making home visits when needed.

Our school counselor is currently in the process of meeting with individual students and setting up services for the summer. So many students are anticipating unsafe environments at home when they are off of school for the summer. Please keep our students in mind and do what is best for them! WE NEED COUNSELORS IN SCHOOL!!!!!! Thank you!

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I am writing as a plea to the committee to stand against the recommendations made by Superintendent Arntzen regarding the elimination of Librarian and Counselor to student ratios. It is the right of every public

school student to have access to a librarian and a school counselor. It is foundational to their well-being, which is foundational to their academic success. Access to librarians opens the door to a child's creativity, to their imagination, their critical thinking skills, and to their sense of belonging. School Counselors provide vital resources to support students struggling with a plethora of obstacles including; truancy, self-harm, suicidal ideation, self-regulation, self-esteem, bullying, etc. etc. ALL of those obstacles get in the way of academic learning. We are here to support them in getting over these obstacles and continue reaching their goals. As a School Counselor I am here to tell you: I am on the front lines, in the trenches with the actual students of Montana. And these recommendations are not just bad, they would be devastating. Elsie said herself in February that mental health supports are vital in education and suicide of our youth is at an all time high. and now she wants to eliminate an already over-stretched ratio. This is a blatant politically motivated move, with no common sense of what our youth need. I want our students to reach their potential, to be lifelong learners, to think critically, and to be kind humans. THIS is not the way to get there. Samantha Jones School Counselor Columbia Falls Junior High School

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It came to my knowledge today, that Superintendent Arntzen has proposed some changes to accreditation standards which would impact School Library Media Services, the number of school counselors available at schools as well as changes to certain electives. I am currently working at a Middle School in Billings, MT as a Health Enhancement teacher. From my observations, I can clearly state that any of these changes would be detrimental to our schools and students. Please consider the current mental health struggles we are seeing in our students, not having counselors available or reducing the number of counselors seems counterintuitive in addressing these issues . I strongly oppose those changes also in regards to changes that might affect Health Enhancement and Physical Education. Please consider the benefits of being active and teaching students lifelong health habits. There are numerous statistics and articles addressing the benefits of movement (of students) throughout the school week. Please consider not approving these changes in this afternoon's vote. Sincerely, Valeria Long Health Enhancement Will James Middle School

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My name is Mary Heinert. I am a teacher in Billings School District 2 and a parent to two students attending public schools in Billings. I am concerned about the proposed language changes to Montana State Accreditation standards. Increasing the staff to student ratio for counseling and library may alleviate some staffing issues, however this will make it more difficult for students to access these education professionals. Further, if the language for required middle school electives is less specific (i.e. no requirement for performing arts/music, foreign language, etc.), students will have less opportunity/access to these rich, creative classes. Please consider opposing the proposed language changes to the Montana State Accreditation standards. Sincerely, Mrs. Mary Heinert 7th Grade Life Science 8th Grade Physical Science Will James Middle School

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My name is Jessica Heier. I am a Middle School elective teacher (Empower and Digit) in Billings School District 2 and a parent to one student attending public schools in Billings. I am concerned about the proposed language changes to Montana State Accreditation standards. Increasing the staff to student ratio for counseling and library may alleviate some staffing issues, however this will make it more difficult for students to access these education professionals. Further, if the language for required middle school electives is less specific (i.e. no requirement for performing arts/music, foreign language, etc.), students will have less opportunity/access to these rich, creative classes. This would put my very valuable classes in jeopardy of not existing in the future. My Empower classes learn about adult life skills, like cooking, sewing, career paths, financial literacy, healthy relationships, consent, boundaries, community projects and involvement and so many essential skills needed for functional and independent adult life. Digit (Digital Literacy) teaches internet safety and shows students how to do proper research for academic goals and also teaches them about all of the Google Apps that will be used in the entirety of their school career. Removing electives is a disservice to the students in Montana. Please consider opposing the proposed language changes to the Montana State Accreditation standards. Thank you, Jessica Heier Will James Middle School Billings, MT

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My name is Josh Schad and I am currently the principal of an elementary school with 16 years in education and the actions that are being brought forward are truly disturbing. Throughout the pandemic, teachers continued to serve our communities and take care of our kids with little thought for themselves. Now that the pandemic is ending you are going to say forget quality education, thanks for nothing teachers, mental health services for our kids isn't really that important, and kids we don't really care what your favorite part of the school day is. Part of what makes our education system works is that we take everyone from everywhere and give them access to tools and opportunities that they would never receive otherwise through a variety of class options and services. At a time in which we should be adding in more supports to help our kids overcome all the consequences the pandemic has blindsided our youth with, your answer is to take away the one constant in their lives. The areas you are looking to cut out of our buildings or make them "optional" will be the first things cut when funding dries up. Before you make changes that will force families from Montana and put our children at a disadvantage, please come spend some time visiting our buildings and see what is really happening. If you take away our mental health services, we will have an abundance of tragedies over the next 5 years across this great state and a whole generation of students who very limited skill sets. There is not one kid that I know that would magically decide to start playing the tuba in high school without the feeder programs within our elementary and middle schools. Taking away these options from our youth will be like chopping the legs off a person and expecting them to walk. We know that early intervention and early access are the key to success. Without these programs and skills being taught early on, our high schools will suffer and so will our communities. Please, I urge you to not begin chipping away at the core pieces of our educational system by finding help for rural communities that are struggling to find educators and showing our state that education is important to those in Helena. Please do not follow the ideas of a superintendent who has no grasp of what really happens in public education and who seems to always be looking for ways to dismantle the very institutions she is sworn to protect. If you follow through with these suggestions, you will be taking away the fabric of what makes public education free for all, regardless of where you live and how "rich" your local community is. I urge you to do what is best for ALL Montanan's, not just those who can afford to go to private schools, such as our superintendent, Mrs. Arntzen. Josh Schad Whittier Elementary

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I am writing to express my concerns regarding the proposed changes to Chapter 55 Negotiated Rule Making. As the 2020 Montana Teacher of the Year and a parent to three young children who are students of Baker Public Schools, I have a vested interest in the quality of education that rural students experience in Montana. I have worked in two rural schools for my entire career, so I understand some of the unique challenges that we have to navigate. However, I have vowed that the students in my classroom will receive access to a high-quality, world-class education while living in rural Montana. My first concerns are with the Library Media Services and Counseling Services. The original language specifies how rural schools will serve students in these ways. The proposed changes and potential use of a consortium or multidistrict agreement will negatively and disproportionately impact Montana students in rural schools. My district is currently part of a cooperative for special education services. Though adequate services have been promised, I have fought for the past six years for my two daughters to receive the therapies and care they require. Unfortunately, districts are already looking for ways to cut expenses. They will use this as a means to reduce library and counseling services to students at a time when they need more access, not less. This revised language is powerful and will cause shockwaves through Montana's small schools. In fact, the changes could even impact larger school districts that require the extra staff indicated in the original ratios. My other concern is the striking of the middle school course offerings language. These requirements were already adaptable to local districts and allowed for local control as school districts tailored their programs. I do support the inclusion of the language regarding American Indians. However, removing the elective course offerings available to students will severely limit the courses available to rural students. This requirement in the NRM exposed middle school students to a broad range of subject matter and though students in large districts may still have access, rural districts will take this as an opportunity to cut programs. Finally, the striking of the minute requirements for middle school students is concerning. Sincerely, Linda Rost, M.Ed., M.S. PhD candidate - Texas Tech University

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I am extremely concerned with the superintendent's recent proposed cuts to librarians, counselors and middle school requirements and standards. It is national news that the gaps students have in a post covid educational

setting are substantial. I am extremely concerned that the removal of middle school offerings and lowering of middle school standards along with the potential loss of funding and librarian positions will only further these gaps in reading and education as opposed to helping close them. I am also extremely concerned with the loss of counseling requirements and potential positions. The rallying cry by Superintendent Arntzen herself during covid was to think of the impacts our school policies were having on student mental health. Now, as we move past masking mandates and into a traditional 5 day a week in-person class settings in many schools across the state for the first time in two years mental health seems to no longer be of concern. The impacts on our students mental health from the past two must be addressed and thought of reducing counseling requirements and potentially positions and funding at any time is concerning but at this time it seems ludacris. I worry our Montana communities will further be set back should the superintendent's recommendations come to fruition. I cannot believe any of us feel a better world for our children is one with less library access, less mental health services and reduced academic choice and standards. Thank you for taking into consideration my comments. Sincerely, Trevor Nichols

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I am against the proposed changes to school library and school counseling staff ratios currently being discussed on 5-18-2022 at 3:30. The proposed changes will negatively affect rural schools and has the potential to reduce student access to important mental health services provided by building professionals. With the challenges k-8 and 9-12 students face, it does not make any sense to remove ratios. We should be helping communities and students by providing more services rather than less. Sincerely, Joe Kusak

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I am writing on behalf of the changes proposed by Superintendent Arntzens regarding specialists. Having these changes will greatly impact our students and teachers. The role that these specialists play is crucial to our school environment. After two plus years of a pandemic, the mental health of our students and staff is more important than ever. Removing counselors from our systems would be detrimental to all. As a teacher who does not have a degree in counseling, I would not be able to support the students the way that they need. In an article posted on montana.gov [montana.gov] on January 25th, 2022, Superintendent Arntzen stated, "the focus on learning is parallel with mental health, and there are numerous ways to serve our youth in mental health." She also said that, "now is the time to prioritize mental health in our communities and in our schools." These comments are true and making these changes would go against what she stated in this article. As for other specialists such as Music, Library, and PE, removing them would only hurt students mentally and physically. Students come to school every day who are facing a multitude of challenges rely on these outlets to help them cope through these issues. Having a librarian care enough to help a student who refuses to read and spend the time to find a book that they may like, has changed this student's life. For the student who is cooped up in an apartment and wants to do sports, PE gives them the outlet. For the students who have behavior problems and rely on music to release their emotions and relate to their lyrics, it changes their day around. Please think of the impact that this will have on the whole SCHOOL ENVIRONMENT. This policy change is radical and totally unnecessary. Please think about all the children and if this would benefit them. Kylee Hauck Kindergarten Teacher Helena, MT

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Hello, I am asking that the changes proposed by Arntzen be declined. Please consider keeping school accreditation standards intact as they are. Thank you.  
Kacey Olson Kindergarten Teacher Washington School

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The changes being proposed by Elsie Arntzen this week are absolutely ridiculous! Having taught in a rural district for many years, I see this as a devastating recommendation. The rural schools need in person librarians and counselors and electives as much or more than their suburban counterparts. Six years ago I moved to the Helena school system and I feel fully qualified to discuss the difference. Librarians create a love of reading which opens many doors and creates lifelong learners. Counselors are so important in this new post Covid era we have entered. None of these changes add anything to our state and actively undermine not only our students but also our teachers. We are already seeing teachers leave the profession in droves, these

new changes would add to that. Please do not let these changes take place, save the librarians and the other changes that Ms. Arntzen is trying to make that would be detrimental to all of Montana's students and educators! Amy Gondeiro Teacher Librarian Jim Darcy Elementary

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I am submitting this email to voice my concerns and objection to Supt. Arntzen's proposed cuts to our public education system via the Chapter 55 Negotiated Rulemaking meeting happening this afternoon. Services and funding to our public schools are critical for us to turn out well-educated, well-rounded, and mentally healthy citizens of our society. The 'flexibility' that is supposedly provided with these changes will result in reduced services and classes for students, thereby reducing positive student outcomes. Public education does not need flexibility written into law that reduces services and quality. Rather, we need to truly address the reason public education has a teacher shortage - it is NOT due to the lack of flexibility of state rule and expectations of schools. These changes impact librarians, school counselors and elective teachers in negative ways. If the teacher shortage is truly the issue, then sweeten the pot and make education a better career option - don't lower the standards. I am a firm believer there are two sides to the story, so if there is solid reasoning behind these changes, it should be available. An item that is included in the changes that I support is requiring high schools to offer economic and financial literacy as a course offering within CTE or Social Studies. That is a step in the right direction. Another positive is the inclusion of the statement "recognizes the distinct and unique cultural heritage of American Indians." This is long overdue, and it's time for schools to have a stronger focus on this requirement. However, past that change, there is little to support. Allowing schools to reduce their counseling FTE by participating in consortiums where our state high school mental health challenges are at an all time high, it is the time to increase services not water them down. As a state, we are already behind the national recommendation for counselors to students. This change has the potential to further the gap in services.

In the high school requirement section, what exactly does "or an equivalent that meets the district's curriculum and assessment requirements, which are aligned with the content standards stated in the education program;" mean after all the individual subject graduation requirements? This is concerning as a Career & Technical Educator. Career and Technical Education is a cornerstone of Montana's public schools. Opening the door with the word 'equivalent' is unnecessary and damaging. CTE is CTE. There is no equivalent. Do not allow our CTE classes to be watered down and diminished in a time when College & Career Readiness is a national priority, and CTE is a major element of ensuring College & Career Readiness. I urge you to go back to the drawing board and ask yourselves if these changes are truly necessary and appropriate. Are you suggesting these changes based on Montana public educator feedback OR are you suggesting these changes from a political platform? Who was on the committee that suggested such changes? I guess I have my own research to do to find out. I'll be honest in saying, I am leery of your motives. In addition, after visiting with school colleagues, public school educators are NOT in agreement with these suggestions. I am optimistic that you will receive many emails of public comment and many faces on today's Zoom call. Do not push forward with these proposed changes. The negative outcomes will impact ALL of Montana's systems, not just public schools.

Sincerely, Megan Vincent

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It may be too late to comment, but in case it isn't, I want to say that the changes being proposed to school accreditation standards are horrific! They do nothing to improve the education our children will receive and actually undermine it by targeting supports that rural schools depend on, in particular. The teacher shortage is real, but gutting the standards and reducing the quality of education that students are entitled to receive is just plain wrong. The standards we teach by and the required services offered to students, like libraries and counselors, were carefully crafted over many years to provide students with a rounded education that will help them function in a world that is changing very fast. In contrast, the changes being suggested fly in the face of every certified educator and every public school student in Montana. They suggest that learning to research well is not important, emotional support is unnecessary and quality education in middle school is not important. I worked hard for my degrees and I take educating my students very seriously! This is NOT the way to address teacher shortages! I am infinitely more than a glorified 'babysitter'! Our students do NOT deserve these changes!

Sincerely, Louise Giebel

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I was horrified to hear of OPI's plans to starve Montana's middle schoolers of resources. Surely there are better ways to address the problems than to cut librarians, counselors, and arts programs. I don't understand these attacks on public schools. Kids have a hard enough time dealing with modern life without their own communities abandoning them. I am truly sickened to witness this happening. I don't even have any children myself, but the future of our country depends on well-educated citizens. These proposed cuts are an absolute outrage! Gwen McKenna

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I am writing to request/beg to maintain the librarian and counselor ratios. It is utterly ridiculous to think that our critical staff members (school counseling and library media services) would not be maintained. Our educational leaders talk a good game about providing for our students socially-emotionally but when it comes down to it - it's just talk. Who do they think shoulders much of the students' needs? This is so illogical and it just doesn't make any sense. Perhaps look at making cuts to services that don't directly touch students .... like admin? Thank you for your time,

Aloma Jess English/P.E. Teacher Laurel High School

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Thank you for your thoughtful consideration of updating Montana's Accreditation Standards. Before you is a proposal to alter 10.55.702 middle grades course offerings, 10.55.709 library media specialists, and 10.55.710 specifying the quantity of school counselors that must be employed by a school. I can only assume that the intent of these recommendations is to afford greater flexibility to schools, which if true, is certainly appreciated. Even assuming such altruism behind Superintendent Arntzen's recommendations, the recommendations clearly exceed practical scope, resulting problems far greater than the ones the recommendations presumably aim to repair. As such, I urge you to decline the Superintendent's recommendations on all three of these items. The foundations behind the middle school concept is that of exposing students a wide variety of core content and exploratory content. Eliminating the requirement for all non-core instruction is foolish by any standard. This suggests that schools shall not be required to provide instruction in music, art, foreign language, etc. until high school. Where is this coming from? Such a sweeping change is needless. Reject the proposed changes to 10.55.702. The library media specialist requirement should follow a formula akin to that of the current school counselor formula that allows for proration of the number of FTE. The current requirements in 10.55.709 have long promoted inefficiencies in schools that could have been served by, say, a 0.75 FTE or 1.25 FTE library media specialist(s). Eliminating the FTE requirement entirely, as proposed, leaves far too much flexibility which will cause programs and services to suffer. Reject the proposed changes to 10.55.709. I offer my suggestion of allowing proration of Library Media Specialist as an alternate. Schools can prorate nearly every other certified position based on population and Library Media Specialists should follow suit. Changes to 10.55.710, school counselors, should be wholly rejected as proposed. No change in the current formula for school counselors has been requested or recommended by professionals in the field. The suggested change is not warranted, necessary, or helpful to schools or students. The recommendation undermines the school's obligation and ability to provide critical services to students. Reject the proposed changes to 10.55.710. Thank for your time and consideration.

Sincerely, Dale Olinger Lolo, MT

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I strongly recommend that you strike down Superintendent Arntzen's recommendation to limit or eliminate Montana students' access to school librarians and school counselors. With the climate of the world today, we need talented librarians teaching our students how to get information and how to discern between what is accurate information and what is not. We need librarians to help students learn how to navigate the internet, with its plethora of information, without them coming to harm. Not to mention students' access to reading materials. Not all students can afford books. Not all students have a grown up who will assist them in getting public library cards. Taking away their one big connection to information and books hinders their education. As for our school counselors, we need them more now than we've ever needed them before. Just look at our teen suicide rates. During my very few years as a teacher, I have seen a steady incline in students with serious

emotional issues. Not to mention, we just went through a traumatic pandemic; we're still going through it. Our children need more help in self-regulation, conflict resolution skills, and with developing coping skills. Our school counselors are key to educating our students in these areas. Eliminating our daily access to a school counselor will increase serious behaviors and disrupt the learning of all. Thank you, Destiney LeCompte

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. I strongly believe that the Counselor to Student ratio should remain in the accreditation standards to ensure that Montana's youth receive the mental health support they so desperately need. In the last two years I have seen a significant increase in our students' mental health challenges, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy and poor academic achievement that occurs from these difficulties. Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. As a school counseling graduate student and a former teacher, I am confronted with the significance of the role of school counselors. Having access to a certified mental health professional in the school is a necessity. School counselors not only intervene during crisis, but they consult with administration, teach social emotional learning to all students, provide necessary services to the teaching staff and do so much more for their schools and their communities. The rising number of children experiencing mental health concerns need school counselors for school to be effective for them. Without access to mental health intervention, these students will not succeed academically and are less likely to succeed socially. Eliminating the ratio of required school counselors to students contradicts the interest of our children, our teachers, and our wider communities. Sincerely, Ellie Canade

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I am a resident of Billings, Montana and would like to voice my opposition to the proposed changes to Chapter 55. The current ratio of students to school librarians and students to school counselors are necessary to maintain the education and support system for our students. Changes to these rules would negatively impact Montana's students, especially in our rural communities. Students actually need more librarians and more counselors, and this rule change would be a step back. Sincerely,  
Alexis Bonogofsky Billings, MT

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My name is Kaitlyn Hall, and I am a Behavioral Specialist within the CSCT program at Chief Joseph Elementary School in Great Falls, MT. As a mental health professional, I am extremely concerned about the changes to the mental health counseling being proposed by superintendent, Elsie Arntzen. How do I go about sharing my point of view on the changes for today's meeting? Best, Kaitlyn Hall (she, her, hers) CSCT Behavioral Specialist at Chief Joseph Elementary

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Please accept this email as comments for the upcoming Chapter 55 - Negotiated Rule Making Committee meeting regarding 10.55.710 and Superintendent Arntzen's recommendations. I am speaking as a private citizen. I am also speaking as a parent with children in the Montana public schools. Counselors and librarians are critical to the health of our students. Changing the ratio requirements may negatively impact resources available to students and staff. I attended Montana public schools and my middle school counselor saved my life as I dealt with toxic classmate relationships and the stress of navigating an ever-changing world as a young adult. As my young children move through their education in Montana, I strongly support school resources for them, including librarians and counselors. I feel better knowing they have other trusted adults they can turn to for life challenges (& triumphs!). I do not agree with the recommended changes. I fully support keeping required ratios to ensure children are receiving all the support needed in their education.  
Best, Christina Lipetzky

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I feel I need to apologize for my last email. Today a coworker and I were reading a different document than what I read yesterday. This was explaining that certain courses were being considered for removal not the actual classes, Art, Music, Counseling and Library. This is completely different than what I read yesterday. 

agree with you in thinking it best to remove unnecessary portions of these classes. More practical, real lessons could definitely be taught. My coworkers and I will spread the word best we can about the truth of this proposal!  
Becky

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I encourage you to reject the broad changes to school counselor, library, and educational standards submitted for your consideration. These changes will only serve to weaken our public school system and reduce access to important educational and mental health support services. Ensuring our students receive a diverse, and well-rounded education is critical for their future success, and lowering curriculum standards as recommended here will not serve them well. Providing our students with adequate counseling and mental health services in schools is one of our highest priorities. Instead of relaxing standards, we should ensure that adequate numbers of well-trained staff are available to our children. As a registered nurse, I see the unfortunate consequences of inadequate mental health services on a regular basis. I encourage you to reject the changes before you, and prioritize high-quality educational offerings and access to library and school counselor mental health services. We owe this to our students, and the state of Montana. Respectfully, Tyson Roth

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Please don't eliminate ratio requirements for Library Services and Counseling staff. Library services help students discover new interests, improve reading comprehension and prepare for continued education and careers to help them earn a living in an increasingly expensive society.

Counseling services are even more important given the state's current lack of mental health services and increasing number of students with mental health issues. These services are especially valuable for children navigating the foster and child protective service systems. I've seen first hand how they help children with unstable home environments remain in school, achieve better than passing grades, and reduce behavioral issues related to unstable homes. Counselors can identify issues with depression and suicidal thoughts that parents and others may miss and they help prepare students to attend college or support themselves after graduating. Reducing these services will negatively impact children who need them to get through day-to-day life. Please support mental health and economic dependence. Please do not reduce these services.

Lisa Coligan

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I have had the opportunity to review Superintendent Arntzen's recommendations for changes to Chapter 55. As an educator with 35 years of experience in two different states and five districts I find the recommendations for library media services, school counseling services, and the middle school basic education programming short-sighted and potentially harmful to the education of students in Montana. CASEL recommends a wide range of best practices in its Whole Child initiative and most of Superintendent Arntzen's recommendations fly in the face of these research-based practices. Based on information in the media it seems that these changes are driven by recruitment and retention challenges in rural areas of Montana. Any solution that waters-down or eliminates requirements is wrong-headed. What if the response to challenges associated with healthcare recruitment and retention in rural Montana were to just get rid of or significantly reduce rural healthcare? At a time when we are experiencing never before seen challenges in the area of student mental health, clearly indicated in the Montana Youth Risk Behavior Survey Summary Report and my own school's behavior data, the dilution of counseling standards is a recipe for disaster both in our communities and within the school setting. With regard to the proposed reduction in high qualified library media teachers, our students benefit greatly from both the maintenance of a carefully vetted library collection and from the collaborative instruction provided to students. This instruction includes media literacy, research processes and critical thinking. Without these trained individuals, it is unlikely that teachers would have the time and ability to add these standards and skills to their classroom instruction. At a time when media literacy is at an all time low and social media is a greater challenge than ever, we need these adults that have the training and background to collaborate with teachers and ensure students receive a well-rounded educational experience. As a school administrator we are losing staff due to salaries and benefits, affordable housing, and childcare costs. These barriers to recruitment and retention of high-quality educational staff should be addressed through means other than watering down the education afforded to all children and is contrary to the Constitutional mandate outlined in

Article X, Section 1. I am further concerned that the recommendations brought forward by Superintendent Arntzen looks very different from the recommendations from the Chapter 55 Task Force. This taskforce is made up of individuals committed to public education and actively practicing in the field who understand the needs of our students. I strongly urge the committee to look at both the recommendations from the Superintendent and the recommendations from the Chapter 55 Task Force before moving forward. Finally, I support the proposed graduation requirement that includes economics and/or financial literacy for all students. What a wonderful change that will support students and the local/state/U.S. economy in the future. Thank you for the opportunity to share my feedback.

Sincerely, Robin S. Arnold

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I'm reading through the recommendations I am deeply concerned about cutting the counselor to student ratio requirements for schools. We are in the middle of a mental health crisis in our children and teenagers. This seems like a very wrong move during this time. I am also concerned to see the world language and music requirements cut from middle school curriculum. Those middle school art and world language classes were what inspired my son to pursue those areas in his high school career. Some thing that would not have happened without the middle school classes. It was his desire to be part of the middle school Jazz band that compelled him to take lessons to learn the music theory to be able to improvise. As a highschooler, he has made all state jazz band twice, and is considering pursuing a career in music. Again, I don't think this would've happened without Miss Sticka, his middle school band director. Playing Music has been a source of great joy and emotional comfort during even these trying years through the pandemic.

Sincerely, Carrie Samsel

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I am emailing to urge the committee not to adopt Superintendent Arntzen's recommendations for changes to Montana's school accreditation standards. Of great concern to me are Superintendent Arntzen's proposed changes related to School Library Media Services, and School Counseling Services. Maintaining these services as they currently exist should be the bare minimum our students deserve. According to a March, 2022 document from DPHHS, the rate of youth suicide in Montana is more than double the national rate for the age group 11-17. Our students need increased access to these services. Any changes proposed by Superintendent Arntzen that have the potential to reduce services, when we know our children need them now more than ever. As a parent of two children in this age range, I have had the experience of transferring one of my children out of the private school she attended preschool-4th grade to our local public school because the private school lacked counseling services. My child is one of many who has needed counseling services through the school, and those services are already stretched thin. Having the experience of my children attending a school without any dedicated counseling services, I know how detrimental it is to all involved, not only for the students. The teachers and administrators should not be expected to fill the role of counselor at any school. Their job is difficult, under-resourced, and under-appreciated as it is. Expecting school staff without official training to also provide informal counseling to students is unacceptable. This leads to lack of appropriate help, support, or accommodations, delays in these services, and unnecessary, and frankly dangerous, additional stresses on students and staff alike. I urge you not to endorse Superintendent Arntzen's proposed changes.

Kara Grau

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I have the following comments to make:RE: 10:55:709 I feel the ratios should be kept for Library Media specialists. I would be in favor of having waivers for schools that are very small -- less than 125 students. If specific requirements are eliminated, then consistency and equity is lost from school to school. Some community members and school board trustees do not realize that areas such as library media are indeed valid curricular studies just as English, math or sciences and expert certified people are needed.RE: 10.55/710 School Counseling Staff I feel a specific ratio should be listed and not eliminated. Currently that is 1 counselor for every 400 students. Ideally that should be lower-- more like 1 counselor per 250 students. Mental health issues and needs are higher than ever in MT schools. Counselors work one to one with students and they also work with many facets of student life -- teaching group classes and working with families and other agencies in

the community as well. This is not the time to eliminate the ratio. RE: 10.55.902 Basic Education program: Middle Grades I am not in favor of #( 3) listing (vi) elective offerings It is important to have specifically listed art and music. Music and art are very needed and vital parts of school curriculum. These need to be physically listed and effort made to provide these. This may take changes and innovations from how things were done in the past, but they should not be wiped out. If they are not listed and actively included in the curriculum, this will have a negative domino effect on the grade 9-12 curriculum -- where music and art will be diminished. In some school districts, if there are certain individuals or factions who have a "favorite" or "convenient" elective to offer, this may sway the decisions of school district officials and school boards and result in electives based on a variety of reasons, including the "path of least resistance". I also feel that foreign languages should be mentioned, not just lumped under the title of "electives". Many families are mobile and the three (Music, art and foreign language) should be offered in all the schools so that when students transfer they have continuity. I write my comments after reading through the entire six pages of proposals. My background includes: being a retired Montana secondary educator having taught all 32 years in MT in grades 7-12 in three different public school systems, a former director of a school district Title I program for a Class A school district with 5 buildings, a past member of OPI Math Curriculum Team in 2008-2009. Also, as a longtime substitute teacher in grades 7-12 including for this school year and as a grandparent of four Montana students in grades 6, 8, 9 and 12 in two different Montana communities.

Sincerely, MaryJo Hamling, Lewistown MT

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I am a parent of a Washington Middle School student. I was appalled to learn of Superintendent Arntzen's recommendations to eliminate the school counselor/student ratio, and to also eliminate critically important specific middle school requirements. It is essential that specific programs for arts, music, languages, and career and technical programs remain as requirements. This letter formalizes my wish as a parent, citizen, voter and taxpayer that those requirements remain. My child and his peers benefit immensely from these programs. There is no need for them to be removed as educational requirements. Equally appalling is the idea that the school counselor/student ratio be eliminated. Why would we entertain the possibility of reducing the number of school counselors? I know two of them personally and their roles are critical to the mental health and regular functioning of students AND staff at their schools. And they are overworked and overwhelmed by their current workload! Our schools, our communities and our world needs more people in these positions - we do not need the possibility of losing those positions. Please make my comments known to Superintendent Arntzen and implore her and the committee not to eliminate school counselor/student ratio and specific middle school requirements. Also, if you could point me to information about why the Superintendent of our public school system wants to degrade the system and do a disservice to students in our state, I would appreciate it. I am truly confused. I don't see how there could be any benefit to allowing the possibility of reducing counselors in schools and cutting programs that bring joy and enrichment to students. Thank you for communicating these comments to those who will consider this decision. Eva Karau

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As a licensed school psychologist, a public school employee, and as a parent to an elementary school student enrolled in Montana's public schools, I would like to speak out strongly against the proposed changes to Chapter 55 that would unnecessarily remove accreditation standards that are designed to ensure a quality education to all Montana students. Removing language that provides for elective classes that ensure that all students have access to diverse and comprehensive educational programs will unfairly and inequitably limit students' exposure to diverse elective opportunities such as music and the arts. While many children may have access to these opportunities in the community, for many, the public school is the one place where they are guaranteed access to something that may spark a passion that will ensure their engagement in school for the remainder of their academic careers. Removing these standards will almost certainly result in inequities in access, particularly for students in rural and underserved communities. Similarly, the unnecessary removal of standards that ensure access to school librarians will most assuredly result in disparities for our state's most vulnerable students. Library media specialists are an important resource for students and staff and the accreditation language that guarantees access to these professionals should be maintained. As a licensed school psychologist, I have significant concerns about the removal of accreditation standards that ensure that all students have access to highly trained school counselors. The accreditation standard as it currently exists is

sorely insufficient. The national recommended ratio is currently one school counselor for every 250 students, while the recommended ratio for school psychologists is at least one school psychologist for every 500 students with the understanding that an even small ratio may be needed in underserved, severely impacted, and/or rural communities. National statistics suggest that schools are historically and critically understaffed in both of these areas. Rather than striking an accreditation standard that requires licensed school counselors, the Committee should be considering why the current ratio is higher than the national recommendation and why no such standard exists to ensure that there is an accreditation standard, consistent with nationally recommended ratios, for school psychologists in Montana's public schools. School-employed mental health professionals, including school psychologists and school counselors, provide critical preventative and responsive mental and behavioral health services to students resulting in improved academic and educational outcomes. These highly trained professionals support school staff, including teachers and administrators, and serve as an important resource for families. Reducing students' access to high quality mental health services in schools is counter to decades of research and contradictory to national trends that indicate that the mental health needs of children and youth are increasing significantly in recent years. Montana's children and their families already face critical shortages of mental health professionals when attempting to access resources in their communities. Striking this language in the accreditation standards will limit access to critical mental health services provided by school-employed mental health professionals and negatively impact school staff, students, and their families. While it may be true that many communities in Montana experience difficulties with recruiting and retaining highly qualified staff, there are a number of strategies and best practices that can be employed to support the recruitment and retention of critical education personnel. As opposed to eliminating critical accreditation standards, these strategies should be employed across school districts and cooperatives to ensure that all Montana students have equitable access to highly trained and appropriately credentialed educators. I urge the Committee to consider the attached materials and relevant research prior to making their decision regarding these changes in accreditation standards and welcome the opportunity to answer any questions about these and other resources.

Shawna Rader Kelly, EdS, NCSP

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I am a 27-year veteran educator in the state of Montana as well as a parent of two. I have taught children in kindergarten, 3rd, a 4/5 multiage, and I am currently a librarian at CRA Middle School in Helena. I am horrified at the proposed changes set forth by the Montana State Superintendent of Education.. Persons who hold these offices are supposed to support and strive to strengthen public schools, not weaken, and dismantle them. They are supposed to be the voice that fights for Montana's children. Educators have been struggling over the past few years with the repercussions of Covid to keep students engaged and present. The sweeping cuts proposed to libraries, counseling services, and electives in the middle schools will cause harm that I truly believe will last the lifetime of many of these children. I've seen from personal and professional experience the mental health struggles students are living with daily. Parents are begging and pleading for help for their children who are suicidal, depressed, and anxious. There are counseling wait lists in the community that are years long. I'm sure you know where Montana ranks when it comes to suicide. It is a fact that schools in Helena, including CRA lose children to death by suicide each year. Counseling services need to be expanded not cut. Children are literally dying, and the proposal is to take away services to help them. Why would children be abandoned in this manner? Libraries, aside from the decades of research that show the benefit they have on student achievement in all areas including reading, writing, graduation, and standardized tests, are hubs of the school community. They are often the one place students who feel as if they don't fit, can go to feel welcome, accepted, and safe. Libraries support counselors and student's mental health. There are two librarians at CRA and with over 1,000 students, we can barely keep up teaching lessons, checking out books, acting as technology support now that Covid has shifted computer use to a 1 to 1 ratio, assisting with research, printing, supporting our staff with their needs to deliver their curriculum and teach our own curriculum. We host spelling bees, geography bees, orchestra concerts, staff meetings, Girls Scout meetings, guest speakers, study halls, make-up testing, and small group instruction. Our library is used as a flexible space for art students, science projects, and film making. It is the heart of the school. Aside from our "official duties" we also house a food pantry where students come daily to get a snack or a few items to tide them over for the weekend. We are the place where students come when they need to step away from their classroom. Teachers send them to the library so they can sit, breathe, relax, and gather themselves. They come here

before school, at lunch, and after school to talk with us about their life, their worries, their dreams. They read books, work on schoolwork, work on puzzles, play board games, even sleep on occasion with the security of knowing they are safe. They talk with us about books so we can help them find the one that will meet their needs on any given day. Whether is to escape to another world, make them laugh or cry, learn about something that interests them, or connect with a character that helps them realize they are not alone, we do our best to guide them to a book that will stay with them and help them become the best version of themselves. Libraries, librarians, and school counselors are needed for all children. Montana public schools must provide equal, immediate, and constant access to these facilities and professionals. Our most vulnerable children will be most affected. Please advocate for them. Don't not approve the proposed sea of sweeping red eliminations. Sincerely, Nancy Peterson

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As the mother of three school-aged children here in Montana, I respectfully ask the Negotiated Rulemaking Committee of the Office of Public Instruction to reconsider proposed rules that would remove requirements for school counselors, art classes, librarians and career training opportunities within our public schools. Counselors, librarians and art teachers play a life-saving role within our schools. My own children have benefited immensely from these programs. Removing these professionals from our schools put kids at risk. Thank you for your consideration and service to Montana. Best, Darby Bramble

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I'm writing in strong opposition to Supt. Arntzen's recommendations. I am a licensed psychologist in Bozeman as well as a parent of 2 children, one currently in the local elementary school. These changes will have many negative impacts on all public school students' achievement, enrichment, health and wellbeing. However, for the purposes of this brief comment, I will focus specifically on the long-term detriment to children, families and entire communities if already thin mental health services for students are cut further. Cutting access to mental health support in schools is unwise, callous, and possibly life-threatening. Schools are a critical lifeline and the point of contact for many students to receive at critical mental health intervention that they may not otherwise have access to. I believe the committee should seriously consider the short and long term implications of making these highly ill-advised changes. Sincerely, Samantha White, PsyD

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Here is my public comment: I am asking to maintain the librarian and counselor ratios. Also, I want to keep the sets and music requirements for middle school so all students have access. Thank you, Valerie Krex

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I am writing as a concerned parent of a former student in the Bozeman School District regarding Elsie Arntzen's suggested changes to staffing ratios for both counselors and librarians within Montana schools. I currently work at the Bozeman Public Library, but I was also a volunteer during my daughter's grade school years at Hawthorne Elementary. I helped during her class scheduled library time during which I saw how important it was for the students to become comfortable in the library and to start learning the basic skills of using a library. The library teacher was able to help these students to not only become comfortable in the library and to enjoy reading, but she taught them their first steps of finding information and creating reports which would help them in the years to come. Not having a librarian for each school would not allow this specialized focus to take place, putting all of that onto the classroom teachers who are already overburdened. More importantly for my own daughter, was the availability of school counselors during her years in Bozeman High. Those were difficult years for my daughter as she struggled with depression and anxiety as she learned to cope with ADHD and more academic pressure. So many mornings it was hard for her to manage just getting out the door and into school due to the stress it caused her. The counseling staff was such an incredible support and a needed safety net for her. I do not believe she would have made it through to graduation without that help. I know that my daughter was but one of many, many students in need of that type of support, and that those counselors are already overworked and yet still trying to help as many students as they can. To even consider decreasing the number of available counselors is clearly irresponsible and, frankly, a dangerous idea. In allowing these counselors to be there to help the students is not only literally life-saving for so many, but in helping those students in need, they also help to support all the other students, staff, teachers, and the

entire community. I beg of you not to allow Ms. Arntzen's irrational proposal to pass. Our schools and our students need all the help and support we can give them. Thank you, Amy Zarndt Bozeman, Montana

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I am reaching out on behalf of my two school-aged children. Our family has gone through a significant transition in the past year. The school-based counselor at my youngest daughter's elementary school has been invaluable in helping her navigate a scary time. She visited with him weekly (sometimes more than once a week) for several months and continues to check in with him as needed. He has been in contact with her dad and I as well regarding her progress. As a result of this service in her school she was provided the support she needed in real time in a familiar environment by an individual she was already familiar with. Many children in our state do not have access to this type of support outside of school, and even those who do are still so very benefited by receiving support when they need it, not on the schedule of a community-based counselor. The recommendation by Supt. Arntzen is in no way in the best interest of our children. She is recommending that we take away integral members of the education system who provide so much value to the public school system. In addition to school-based counselors, our librarians provide enrichment to our children on a daily basis. Both of my school-aged children are avid readers, and they absolutely LOVE their school librarians. For those students who may not love to read though, a good librarian can help them find a genre, a series, a book,etc. that meets their interests and fosters their interest in reading. The fact that there is even discussion about the value of librarians in the school is absolutely ridiculous. These recommendations made by Supt. Arntzen will only do a disservice to Montana children. In my opinion that is the very opposite of the mission of the Office of Public Instruction. Thanks for your consideration. Sincerely, Kelly Hunt, MN,RN,CNL (and a very concerned mother of two young daughters)

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I want to re-iterate the sentiments addressed by my friend Jocelyn Bjornstad. It is worth your time to read again. It is with grave concern that I send an email in response to OPI's new proposed changes to the school requirements. It has become blatantly clear that the people making these proposals have either lost touch with the needs of the students or are willfully making decisions that will negatively impact students without regard for their wellbeing. It is in solidarity with my colleagues that I would like to highlight some of the most egregious problems in the proposal. Please note that in no way is this a comprehensive list of issues however we have been denied adequate time to respond to every outrageous proposal so I will highlight the following. - Mental Health of Students. According to the World Population Review, Montana is third in the country for suicides. As recently as March of 2022 Billings MT was reporting that in a recently survey "The survey, made up of 98 questions for students in grades 7-12 and released last fall, revealed that 41.4 percent of high school students reported feeling depressed almost every day for at least two straight weeks. That's an all-time high, especially for women who self-reported at 52.6 percent." Yet the proposal reduces or allows for the elimination of staff related to mental health support for students. Teachers are experiencing more behavioral issues than ever before and these students need support from trained professionals. The only way to ensure students have successful futures is to provide early intervention and support, which you have decided to deny our students. Offering a "contract" option is an unstable and inconsistent solution and students need the consistency of a counselor they know and trust year after year. By removing the requirements OPI is sending the message that mental health support professionals are not valued employees in our districts. - Library. It would appear that there is a severe disconnect between the people making the proposals and the role of the Librarian. We put a huge amount of responsibility on the librarians to be experts and educate in many area's, including internet safety and responsible research. School library programs foster critical thinking, providing students with the skills they need to analyze, form and communicate ideas in compelling ways. Schools with librarians consistently have higher reading scores in all grade levels and have fewer Below Basic scores. These correlations cannot be explained away by teacher qualifications, pupil ratios, school funding, or student demographics. - Electives. By removing the requirement of an elective you negatively impact a child's education. There are countless articles, studies, and doctorate thesis focused on the impact art, music, and PE have on a students emotional and academic growth. More than ever our students need an outlet of expression while they navigate these challenging times. Beyond the emotional outlet music and art aid in all academic areas and are used in a co-curriculum to help aid learning. By writing a proposal that elements these requirements it is an obvious that the writers do not understand the importance and have gone out of

their way to remain uneducated on the benefits. □ Here are some quotes from students in the Helena School District:

• “I love music, I love to sing. I love my music teacher” • “Library is the best because we read books and learn about different things. I learn about grammar and other things” • “We should keep music because people like the calming flow of sounds, like me!” • “I’m a third grader and in my opinion Library ROCKS! I like getting to read” • “3 reasons to not get rid of PE. 1. It’s good for you. 2. Some people like it. 3. Exercise” • “I like music because it is calming to me and gives me contentment and joy. Music gives me joy and happiness.” • “I like art because it can help you become a good artist and help your writing”

• “Library is the best for kids because creativity in books is great for kids. Kids need to read if they want to have the ability to do important things in the future” • “I like art because it makes you have good ideas and it makes you creative” Our students deserve to have access to professionals to teach them these subjects. Simply “integrating the subjects” into a standard classroom puts the responsibility on the teacher to be an expert in fields that others dedicate their whole lives to. There is no way a classroom teacher can successfully integrate these subjects because it is simply too much for one person alone. That is why we work in a system of collaboration for education. At this time OPI is looking for an easy solution to a complicated problem and hoping no one will notice as they try to take the easy way out. Our students, our teachers, and Montana deserve better than a copout solution. It is with great concern that I will end by saying everything I have written here is widely known information and common sense. If the people creating this proposal do not understand the implications of their actions that it is no longer appropriate for them to retain their positions and should resign their roles to allow more qualified professionals to manage this job. Jocelyn Bjornstad

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Thank you for your time and attention on this important matter. Megan Zuhoski

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We just recently learned about the proposed changes to Montana Chapter 55 education policy and wish to convey our concerns related to no longer requiring school districts to offer music or arts classes in elementary or middle schools. We have raised two children whose emotional and intellectual capacities were significantly boosted by their participation in art and music classes. Had these classes not been available, or had our children not been required to participate in them, we do not believe they would be where they are today academically and socially-emotionally. We not only see this growth in our own children, we have witnessed this in many of their schoolmates, as well. There is considerable research showing that kids who participate in music programs score higher than their non-music peers on standardized tests. Montana's future, as well as the future of the United States, depends so much on our public schools' ability and capacity for helping kids reach their highest intellectual and social-emotional potential. Please do not fix what isn't broken. Our arts and music programs, as well as our library programs, are critical. If anything, we would love to see more support for them, including staffing and funding. Sincerely, Jill Seigmund

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I am writing to voice my concerns about proposed eliminations to public school standards. That is what is occurring with these proposals. It has severe consequences for middle school students in the state of Montana. These standards were instituted after much study over time. They were thoughtful and professional. They had the students of Montana in mind. To summarily eliminate any of these standards is a disservice to students in Montana. It will hurt Montana kids and particularly our smaller schools. Thank you for your consideration, Kathy Milodragovich Retired public school teacher Butte, Montana (A parent, grandparent, taxpayer and voter in the State of Montana)

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As a teacher in the public school system, I am reaching out to hopefully change Superintendent Arntzen's recommendation to change the School Accreditation Standards. I have utilized our school counselor daily for the last 7 years that I have been teaching. We have had so many issues with our students in regards to bullying, negative social media impacts, thoughts about suicide, and a bad home life. Our school counselor has greatly impacted these students in a positive way and is 100% necessary. I personally think we need more

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counselors in our school if anything. Please reconsider the recommendation so our students can have successful years to come. Thank you. Megan Olson 1st Grade Teacher Lolo Elementary School

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Are you freaking kidding me.....we're you all hired to destroy our schools? I cannot believe the blatant disregard for education coming from the state....stop....this is wrong... Cheryl Ehresman

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I'm writing to express disappointment in OPI's proposed removal of counseling services ratios. The ratios are already high, making it difficult for counselors to meet the already high standards/workloads. There has to be a better solution to helping schools recruit and retain counselors. Please support our most vulnerable students by keeping school counselors a priority. Sincerely, Erin Farrell

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I am lucky enough to have worked in a school district that kept my counselor to student ratios around the 300 number. Even so, that number of students can be a challenge. School Counselors are tasked with the academic/social emotional/ and career needs of each and every student they serve. Making sure students are on task for graduation, progressing in developmentally appropriate ways and referring/providing services if they are not, are some of our many tasks. In the last 5 years the mental health needs of students, particularly adolescents has skyrocketed. We know that the rising numbers of young people attempting and completing suicide is on the rise. Providing Social Emotional Learning and emotional regulation tools allow students to manage their emotions and talk with adults to solve problems. The School Counselor is the heart of every school. They are members of teams that respond to every crisis, every school shooting, every death and every community tragedy. You see on every television screen in America, "counselors will be available to meet with students when they return to school." We know through research that relationships are why students complete high school. We know that the growing need in this country for skilled workers is at an all-time high. School Counselors are particularly trained to provide an individual relationship with a kid to assist them in finding their pathway into the workforce. We also know that early intervention and screening can help all kinds of students be successful on their educational journey. School counselors have unique skills that can address those intervention needs. Current students doing well will no longer have access to a resource that keeps them stable if this recommendation is adopted. Struggling students will continue on a downward spiral without anyone to track, intervene, respond and refer. Graduation percentages will plummet and dropout rates will rise. Other states in this country are well aware of what an integral part of school success the School Counselor Role provides and are working hard to reduce student ratios and hire/train additional School Counselors. Skilled workers will no longer move from a high school diploma to a technical center, trade school, union apprenticeships or internship. They won't know how to find them. Organizations/labor force professionals won't have a partner to work with to ensure that pathway is presented, advocated for and applied to. Finally, school districts who are guided by this adoption will find themselves at risk for lawsuits when properly trained School Counselor Professionals are not available to provide a suicide screening, evaluate a threat assessment or stop an escalated child from leaving the building. We won't be available to complete the Harvard hopeful's letter of recommendation. Stanford and Penn State will have no relationship to draw on when they want to discuss concerns they may have about a student. The repercussions on other professionals, like School Psychologists will also be impacted because what little extra time they have to provide resources to non IEP-identified students in districts will now be crisis driven. Referrals for Special Education will be delayed, again putting a district at risk for lawsuits. In addition, the reduction of access for students to a trained certified Librarian will impact many of the issues I have already raised. Relationship is key for student success. Reading is key for student success. Finding and developing our own personality and finding reflections of our culture/history/experience in characters is life-affirming. Indian Education for All????? Where do you think teachers and leaders look for resources, assistance, and partnership? The LIBRARIAN! The Librarian is a leader in every school I have ever entered. They know the answers or where to find them. They teach students how to gain access to information outside of their sphere of experience. Little town in Eastern Montana, Malta, for instance had a librarian we all called "The Dragon Lady". She did not permit talking, only silence made her happy. She could recommend my next book before I was finished. She could order me a book if I needed more information. She provided a world outside of my dreaded teenage experience that left me drained and suicidal.

Students loved her. The art department painted a giant mural on the back of the library wall, 2 stories high that depicted her as a dragon. She convinced me I could go to college, me a bi-racial student from poverty and no role models moved on to be a first-generation college graduate. My love for reading was firmly rooted by an older sister (an educator) but was nurtured and driven by my librarian, Maxene Renner! (it was a school librarian in Malta who helped me remember her name today!) Your responsibility is to make sure that every student in Montana, regardless of their zip code has equal access to information. Lowing Librarian numbers to stretch across multiple buildings will not meet that need. Small schools will be unfairly impacted by both of these decisions. Don't put the 90% of our school districts in Montana in this position. Please oppose the OPI Supt's recommendation to increase the ratios for the Librarian and Counselor fields! If anything, do some research and consider reducing them! Everyone deserves access to a quality relationship with a life changing adult in their life! Please send me a link for the committee meeting today.

Sincerely, Christine L. Kolczak

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Getting rid of the counselor ratio is such a horrifically bad idea, it's obvious the goal has nothing to do with helping students, teachers, or counselors. This helps Arntzen bury her head in the sand thinking she's helping anyone with anything. Montanans see right through this, and we do not forget.

I am a school counselor in the Helena School District and if ever there was a time for student support services in the schools, it is now! I am writing to support maintaining the counselor ratios. Thank you

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My family moved to Montana a little over 3 years ago. My daughter has been in the Great Falls public school district since that time. She had previously lived and gone to school in another state, which did not employ counselors in k-5 schools. When I found out that my daughter would be going to counseling once a week as part of the curriculum I was cautiously optimistic. I cannot tell you how many times I have been thankful for those counseling class sessions. They've helped my daughter and our family through deployments and bullying, as well as how to communicate respectfully with her peers, which as an only child has been invaluable. It is my belief that counseling is a service that no child should go without, especially in the current mental health climate in the United States. I fear that doing away with these ratios will make it near impossible for one counselor to meet the mental health needs of so many children no matter how dedicated they may be. I'm asking that you please maintain the current ratios of this priceless service. Thank you, The Cook Family

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Both counselors and librarians are essential to have a complete learning environment for children. The counselor provides irreplaceable support for students in and out of the classroom setting. They assist with everything from problems at home to problems at recess. Librarians also provide support to our students. They instruct them on proper library usage and finding information for projects. Librarians also help students have a passion for reading. They find a perfect book for each student. Cutting back on either of these positions would be detrimental to our students. Sincerely, Traci Lozier District II parent

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Please maintain our current level of counselors at our schools. Our students need more access to mental health providers & specialists not less. Also students need easy access to libraries. Some of our students don't have internet or help at home & can get it at the library. Please put our students first & keep the same level of counselors & library services. Thank you, Kim Popham

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You cannot allow counselors to be taken from some of these kids. It's crucial. Especially now! Please. These children matter. Stefanie Coyle MT resident

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I'm writing this email in support of maintaining, if not improving, the current ration of students to librarians and counselors. If anything, there should be more of each of these professionals in our schools supporting our

children and their teachers. The lessons and care that come from both of these are invaluable, and are truly life lessons. I have three children in Helena schools, and all have benefited from their school counselors in various ways, including (and definitely not limited to) 1-on-1 counseling sessions, class guidance, peer conflict resolution, learning improved emotional intelligence, and the list goes on... The librarians are the same. The lessons taught that will serve students throughout life to be informed, curious, and researchers are invaluable and immeasurable. Making either of these groups of professionals harder to access for our children is a disservice to all of us. Thank you, Andi Michalson

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We need ratio numbers for our librarians and counselors. These are essential services within a school, especially after everything that has occurred these last few years. Please don't eliminate the established ratios. Sandi Shawhan

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The latest proposal to cut the funding for counselors and librarians in the Montana schools will be a disaster for Montana Students. Now more than ever students need support, cutting funding to this will exacerbate existing problems and create an untold number of new ones. Montana kids deserve better than what Ms. Arntzen is proposing. Thank you A former Montana Student, The child of Montana public educators Liz Hoy

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Please talk Arntzen out of cutting counselors in schools. Children need that service to identify and help them with adverse childhood experiences. Parents don't have to be trained before they have kids, and some are woefully inadequate. Please put a safety net in place for them.

Students in Montana deserve better than Elsie Arntzen. As a parent, I vehemently oppose her proposal to eliminate or restrict access to counselors, librarians, and electives in our middle schools. Please do the right thing in preserving specific electives and credit requirements, and keeping counselors and librarians in our Montana schools. Sincerely, Megan Mattingly-Arthur

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I am writing in response to the possibility of CSCT services being cut in schools. I work with SED students. I have seen first hand the mental health crisis in our students. I typically lose at least 1 student a year to completed suicide, if not more. That means at least 20 students in my teaching career. Do you have any idea how devastating this is to so many people, not just their families. Montana is consistently in the top 5 in the nation, usually the top 3, for completed suicides. Please explain to me how removing this is helpful, particularly in rural schools. I keep trying to understand how government officials who profess to be Christian can do this. Did Jesus not say what you have to the least you have done to me? How does defending mental health services supports Christian values? I hope someday someone explains this to me. Perhaps it will be you? Please do not remove funding for mental health services in school! The future of our children is in your hands. This is not a republican or democratic issue. It is a humanity issue. Support our children, I beg you. Sincerely, Tracy Preston

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If it's dollars: Cost of Prevention v.s. Correction If it's rights: Access to knowledge Civil discourse v.s. Correction and destruction If it's happiness and contribution: Consider the knowledge and the support systems. (Counselors and libraries)

The proposed cuts in services in the areas of counseling and library proves our State Superintendent does not have the students of this state as her focus. Montana kids often do not have access to computer technology, research capabilities, or even local libraries other than in the school settings. Their homes are rural. Their communities too small to support a library. By not funding libraries fully Montana students cannot hope to remain competitive in the job market or respected in an educated society. Cutting counseling services. Wow. Alert the funeral homes. Suicide will sky rocket and the death of every victim will be on the hands of this Superintendent and these leaders.

I am emailing with a great concern after hearing Superintendent Elsie Arntzen plans to cut funding for counseling/mental health services and for libraries our schools. I can't even fathom how this is even a consideration when mental health issues are on the rise at this time, especially in the Flathead Valley. Last year alone the county had 5 if not 6 teenagers take their own lives by suicide. Having access to mental health in schools should be increasing not decreasing. More and more youth of today are under tremendous pressure and stress, especially in the last few years dealing with covid and constant challenges. More mental health should be coming to our schools not less. Libraries also provide such a fundamental service to the students. I have 2 boys in the Columbia Falls school district ages 13 and 17 and am grateful for all the help they currently have access to. Can you please help me understand why these cuts are even being considered?? Thank you Lisa Austin

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We beg you to keep our school curricula on the high road! Do not give in to Ms. Arntzen's short-sighted plans to gut the vital Arts, Middle School sciences, Libraries (for God's Sake!), foreign languages, and necessary life-saving counseling services. Elsie—Our public schools deserve a champion, not a destroyer. And our Montana kids deserve the best education we can continue to give. DO NOT cut these programs!!!! Nancy Harper—Carroll College instr.

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The following recommendations will hurt Montana's school-aged children, as well as diminish the capabilities of ALL Montana's teaching professionals. Not just rural schools, but all schools are severely overwhelmed coming out of the last few years. Additional resources and support are needed - not removing what is already there. Additionally, Montana's children already struggle to compete in a global world of opportunities into their future higher education and work lives. Do not remove education items that support Montana children's development and growth. Amanda Clark Helena, MT

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Elsie Arntzen is failing her mission to uphold the mission of public schools. How can she propose cutting school counselors, librarians, Middle School science courses, as well as the Arts, and Foreign Language instruction?????. Does she not understand the significant role public schools play in training well-informed members of a democratic society?? We all know, after our Covid shutdown, how essential mental health is to our young people; and our school counseling staff is already over-worked. To even suggest cutting their number shows how truly out of touch—or just plain uncaring—Supt. Arntzen truly is! As teachers ourselves, we know absolutely the power that teaching the fine arts and languages has to understanding how to think about the wider world and all other subjects. DO NOT CUT our top-notch Montana education standards, curriculum, and life-saving services!! These kids are our responsibility!! Nancy Harper. Michael McNeilly. Dr. Rob and Emily Maher

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Mental health is more important now than ever! I urge the superintendent not to lower standards for school counselors in MT. Thanks Laurel

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The elimination of safe staffing ratios for librarians and mental health professionals/counselors being applied to ALL Montana schools is unconscionable. These changes will effectively water down not only the quality of education in Montana for ALL students -AA to C- plus those strong standards that all students and staff thrive under will be less than. Please stop making what we offer the children of this state "less than". Please. Jill Munson

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I am writing as a mother of an elementary aged Montana student. I am writing to express that the only aspect of the student to counselor ratio that I want to see is more counselors per students. During the last two years our children have had more than their fair share of hardships. Now is not the time to eliminate resources that they need and deserve. If you want to take beneficial action please increase counselors for our hard working school children who all deserve the very best we can give them.

Thank you Thea Varichak

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I'm writing to say that I am very upset at superintendent Arntzens recommendations to decrease school library media services and school counseling staff. Kids need support and studies show that counseling has a significant positive impact on kids. <https://www.schoolcounselor.org/getmedia/7d00dcff-40a6-4316-ab6c-8f3ffd7941c2/Effectiveness.pdf> [schoolcounselor.org] Decreasing these services is incredibly stupid; our children are our future and we should want a better future for our kids, not a harder one. School libraries and media services are also very impactful; many of my adult interests, and even some of the things I do for work were inspired by things I did in libraries as a kid. Thank you for your consideration, Craig Threlkeld, Missoula resident.

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Today at 1:30 p.m., I learned about Elsie's proposed cut backs to public schools in Montana. I am horrified to think that mental health, librarian services, art, music and more would appear on her chopping block. As a retired, Special Education teacher with grandchildren in the Billings Public Schools, it sickens me to think about the ramifications for their Education that these cuts would mean. Additionally, our schools are already lacking in these areas as specialists are spread thin with enormous caseloads, and classroom teachers don't have the support they need to help the students who exhibit disruptive behavior. Please, I beg you to read the research, take the time to analyze the data in these areas in terms of impacting student success, rather than merely looking at places where you plan to "rob Peter to pay Paul" in the budget. Please support our teachers and our students by addressing their mental health issues, supplying them with the literacy Education they need and rounding out their Education with art and music which are often the life lines that keep students in school. Thank You For Your Time, Shirley Waldron M.Ed.

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I recently retired from 30 years as an educator. My degrees are in Elementary Education/Music with a Masters in Integrated Art and Education. I have taught in classrooms, managed a library, and worked in visual art, music, and theatre. I am deeply concerned about Elsie Arntzen's proposed rule changes.

Over the years, I have witnessed, struggled, and tried to address the growing and concerning needs for my students. Without the support and guidance from our specialists, our counselors being one of them, our learners are left in a raft with no oars. I have had students' parents kill a spouse, kill themselves, attempt suicide, abuse their spouse or their children, frequent jail (once both parents were in jail at Christmas) and abuse drugs. Students come to school with emotional problems that teachers dream of having more skills and training for. Students are hungry, vulnerable, and in our care. We NEED our counselors and, if anything, we need MORE not less. I have also witnessed how students respond to the arts as a means to expression, individual satisfaction, and self-esteem. By the time our students get to middle school or high school, choir, band, theatre, and visual art might be the place they find acceptance and a bit of peace in their day. Montana has excellent schools. I am so concerned that Elsie is not capable of understanding what has been successful and put Montana students ahead of the pack. Right now, my former colleagues are AFRAID to teach much on Martin Luther King, JR and black history. They are actually AFRAID to say too much about Indian Education For All subject matter. How in the world is this helping our students? Save the counselors, librarians & books, and our arts! Support IEFA. Elevate Montana by keeping our ratios and standards well-rounded and high! Thank you!! Brenda Bolton Florence, MT

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I am shocked and appalled to have literally just now learned of a proposal to cut staffing, funding, and/or requirements for music, visual arts, counseling services, and/or library staff in Montana's schools. This proposal, which seems oddly secretive and which seemingly has an alarmingly short public comment period,

would be anathema to everything that schools should be doing. The arts have been proven time and again to help students not only become more well-rounded people and give them tools for self-expression, but to also contribute to brain development that supports success in other subject areas. The arts are not "extras" thrown in to round out the school day -- they are INTRINSIC to student learning and growth. While counseling staff is needed in great measure even in the best of times, to cut these services in the aftermath of covid, when students face an inordinate amount of cultural upheaval, when there is more stress for young people than ever before, is downright negligent and dangerous. Any decent educator would stress literacy; cutting library resources and services is simply outlandish. I regret I did not have the time to cite resources in composing this email, but the facts remain -- that cutting ANY of the services listed above is completely unacceptable. Rather than doing so, please consider INCREASING funding for these areas. Thank you, Amy Chisholm Mom, Educator, & Citizen who Cares!

Amy Beth Chisholm, BA, BM, MM Performance & Teaching

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I apologize for getting these comments to you so late (given the meeting this afternoon), but I only now became aware of what is at stake, and cancelled my own plans for the morning to put some comments together for your review.

I am writing to advocate for the necessity of maintaining essential, qualified supportive services for mental health in the Montana public schools. One has only to look at the unprecedented numbers of depression, suicide and violence among school age children to see the reality of a generation facing critical stresses. Added to these issues are the number of kids who now struggle with their own very real challenges in how their still developing brains shape their capacities to learn and to socialize with their fellow students. The school years are critical in shaping young people to become functional, responsible adults and citizens. I have a grandson, I spend regular time with, who struggles with very real behavioral issues that make it challenging for him to sit and learn in a classroom. His parents have been seeking professional help for him, as there is no doubt that he needs more than they or the school can deliver entirely. We are very encouraged with the calibre of therapeutic services that he is now beginning. However, I would like to address the critical role that the public schools play in how he comes through these next few years. To my knowledge, there is only one school in Missoula right now that has the full range of supportive services that can accommodate children who need the chance to have time out of classroom with highly qualified support services. My grandson desperately wants to be in school, to have friends, and to be successful. He is very bright and socially inclined, but as someone with a complicated ADHD brain. Without a full range of skilled, qualified counseling and support services, I can see that he would become an outcast, bullied, and feel defeated. Kids like my grandson have precious gifts that need to be recognized and developed. They need a continuum of care and support to help them overcome the challenges that they did not choose, so that they can become contributing, functional members of our communities. Schools play an essential role as part of that continuum, and without the number of highly qualified school counselors required to provide the critical services to these kids, schools will fail these kids, and the problems they struggle with will continue into adulthood. Tragically, we already see far too much evidence of this kind of systemic failure! Let me give you some specific examples of the problems that result when a school is not well enough staffed with qualified counselors:

- A child that is being disruptive to the class is sent out, but no one is available that can spend time with him (or he) in a meaningful way.
- The parents get called, and if both are working, someone has to leave work. If this happens frequently, a parent can lose his or her job. Meanwhile, the child gets no help!
- A child begins to see him/herself as being a problem, something wrong, not successful or liked. In my grandson's case, he was eventually transferred to a school out of his district, to another school (within the public school system in Missoula) that had a full range of support resources available. One parent or the other had to transport him to and from school. Here's what the benefits were of this transfer:
  - For some time, he struggled with the change. New kids, new teachers, new building and rules. The adjustment was challenging in itself, but now, when he was not able to participate without being disruptive, he was sent out to a place where there was a trained person available that worked with him until he was ready to go back into the classroom. There was an integrated team of people who worked together to develop an IEP for him.

- With time and experience, he was able to adjust, and by the end of the year, was able to be in the classroom most the time without incident.
- His parents were not getting called to come pick him up, but they were kept informed as to his ability to function and participate.
- Both parents were able to work at their jobs without interruption, which contributed to their stability.
- My grandson felt happier, more content and like he belonged at the school. He was beginning to make friends.

We are hoping to get him back in that school for the next school year. Mind you, to my knowledge, there is only one school in the Missoula district that has the full range of support services available. If the ratio of student to counselor is decreased, so that the ability of the counselor to be involved and engaged with these kids is totally unrealistic, we are looking at a systemic failure, and increasing numbers of kids who fail at various ways - by depression, aggression, drugs, suicide, etc. Our families and communities cannot afford this kind of failure. I know Superintendent Arntzen is inclined to reduce the cost of public schools, including the mental health support services. Doing so would produce tragic and unacceptable outcomes. There is no more vital investment in the social fabric of our communities and nation than in the education and well being of our children. Thank you for your consideration. Sincerely, Marti de Alva

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On behalf of MFPE and its members I requested a link to provide public testimony but realize time for testimony is limited. In the event I am not elevated in the Zoom session due to limited time will provide a brief record of MFPEE'S strong opposition to Superintendent Arntzen's recommendations that you will be reviewing today for 10.55.709, 710, 901, 902, 904 and 905. In each case, we would recommend that recommendations not be accepted. The students of Montana will not benefit if these recommendations are implemented. In all cases, except for the addition of language dealing with Indian Education for All, it would be better to leave the standards untouched. The result of the proposed rules would very likely be a reduction in the number of school counselors and library media specialists in all schools with very limited ability to track what services are provided to students attending our schools. Many electives that help provide our students with a quality education would very likely be eliminated. I would urge a more careful analysis of the type and degree of services that are currently offered under current standards before finalizing any recommendations. I have had the opportunity to observe the meetings of both the School Quality Task Force and the Chapter 55 Rule Making Committee and these broad recommendations are not in line with the conversations that of task force members. Protect Montana's quality schools on behalf of Montana's students and to provide reasonable working conditions for our Montana's accredited schools' staff. I would be glad to discuss any of the issues. Beset regards, Diane Fladmo

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I am opposed to the changes proposed for ch.55 of the education policy. Music and arts education have been shown to have major benefits to developing kids and encouraging a creative mindset. In addition these classes and the libraries have always provided a special place for students to express themselves. Please reconsider these changes and help keep those programs alive. Thank you for your time,  
Kim Solem

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Please keep the current ratios for school counselors and librarians. In fact, we, as a society, we should be demanding more counselors. with the amount of trauma in children (and adults), there is a great need for good [https://urldefense.com/v3/\\_http://counselors.as\\_!!GaaboA!qi5VK0kdRBSBYCjGS9wghJWYYFHWw-ki3Q\\_MHfU9Rkcm5cDDEDRalvcMkCbkPYqYRvIXfISHePbPH45MRtQdIUtXWKA9yE\\$](https://urldefense.com/v3/_http://counselors.as_!!GaaboA!qi5VK0kdRBSBYCjGS9wghJWYYFHWw-ki3Q_MHfU9Rkcm5cDDEDRalvcMkCbkPYqYRvIXfISHePbPH45MRtQdIUtXWKA9yE$) a parent, a grandparent, and a retired teacher, I urge you to spend a good amount of time in a rural school and ask educators and children if these are current needs in our state! Also, please leave liberal arts in middle schools. They are imperative to growth in so many educational core subjects and reach learning in different ways, encouraging children to be successful in unique ways. Thank you!

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I am writing to you in opposition to Supt. Arntzen's recommendations to alter Montana's accreditation standards that directly impact student's access to arts & career electives, as well as librarian and counselor services. I have been working in the schools in Montana for more than 7 years. Every school day I witness firsthand the impacts the arts and electives have on student's success, confidence, and overall attitudes. Access to these electives and services are essential for creating a well-rounded education. I ask that these recommendations are opposed out of respect to our students, staff, and education as a whole in this state. Joanna LaPorte (she, her, hers) Art Teacher

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I have been an educator for almost ten years in the State of Montana. We strive for excellence but most importantly we strive to provide the best resources and support systems for our students. Superintendent Elsie Arntzen's proposals are a disservice to us as educators, our students, schools, staff, and families. In all honesty, I don't think she is fulfilling her duty of what's best for Montana schools and students, she is doing what's best for her own agenda. Montana has been ranked as one of the top 5 states in the nation for the highest suicide rates, yet our Superintendent thinks it would be great to decrease the number of counselors available to our students. Mental Health Professionals are an important role for students now more than ever! Just ask any outside of school counselor and they will inform you that their lists are overflowing with children and families in need of mental health services. Over the past 16 months the pattern of suicides have increased significantly in the Flathead Valley alone. There is a mental health crisis affecting more children and youth more now than you realize. Please do NOT decrease the amount of counselors available in our schools. Also decreasing access to books/Library media and other electives is not giving our students equal opportunities if her proposals were accepted. Please think about the future of Montana. Our students are our future. If we don't support them and provide more than enough counselors, wide range of electives, and books to read, then we are setting them up for failure or worse. I am standing up for our students, families, and our schools. Please reject Superintendent Arntzen's proposals. This is wrong! She does not see the trauma that A lot of our students are enduring day in and day out. Counselors are heroes for our students but our staff too. We could not do it without their support and help! Please recognize that we actually need to add MORE counselors to every school in the state of Montana not decrease the amount of counselors. Do what's best for the future of Montana! Reject her proposals and get a better Superintendent who supports what we do in our Montana school systems. Thank you, Jenna

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I am writing about the recent buzz of cutting school counseling positions. I feel strongly that they need to be left in place. Replacing them with someone else will cost the same if not more money. My daughter is a school counselor in Billings School District 2 and I am amazed and in awe of how many times in the last 8 months she has talked about helping middle schoolers in crisis. Where did all the money go from the MONTANA POWERBALL, when it was voted in IT was supposed to fund schools so that WE are not 49th in the USA..... Why do some Schools have a Superintendent, assistant superintendent and principals and more assistants???? NOT to mention the rumors of bad teachers or administrators being kept on payroll but moved to unimportant jobs... how about start looking at the top to save money ....MENTAL HEALTH is a huge problem. I 100% disagree with limiting school counseling jobs. They are way too IMPORTANT for our children. Thank you for your time. Crystal Pardy MA CCC

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My name is Susan Davis I am a resident of Bozeman, Montana and I teach K-12 multilingual students in Belgrade School District. The following reflects my personal views on the subject at hand and does not reflect that of my employer. I am opposed to the proposed changes made by Superintendent Elsie Arntzen: 10.55.709: As an educator of students who do not have many opportunities to see themselves reflected in classroom curriculum, the library offers a place for them to find themselves in books. The librarians at Belgrade have worked hard to give my EL students the opportunity to read in their new language and the opportunity to take a break and read in their home language. In order for my students to find success in the classroom and beyond we need to be fostering more of these opportunities by hiring more librarians not less. As such I am opposed to the changes in 10.55.709 that would result in fewer librarians in schools. 10.55.710: All educators have seen the need for more counselors in schools since the pandemic. As a teacher I rely on

the counseling staff to be available for my students in crisis. Again my multilingual students find the counseling office to be a place where they are safe, where they are welcome, and where they can ask for help when they need it. School counselors are often the only mental health professional that they can access. As such I am opposed to the changes in 10.55.710 which would result in fewer counselors in schools. 10.55.902: As an educator who teaches students with interrupted formal education I know the effect it has on a student's high school readiness if they did not receive yearly year long courses in language arts, math, social studies, and science. They are not prepared for the rigorous curriculum demands of high school. Additionally, I teach students who do not have an opportunity to take an elective of their choice due to Language Development needs. Students need access to music and art. This is what they look forward to and gives them a feeling of success and self expression. As such I am opposed to the changes made to middle school offerings that would remove electives from schools. Thank you for your time, Susan Davis

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Please do not gut the necessary support and curriculum for our public school students and teachers. My kids have gone through the public school system in Bozeman from kindergarten to high school. I will tell you that they have used every resource that you plan to cut or reduce.

Librarians, also known as information specialists and literacy experts. Do you think every kid knows how to research when they walk in to a library? These information specialist assist kids of all ages find info they need via written and electronic resources. They are indispensable. Cutting music and art in elementary and middle school? Seriously? School is the first place most kids are exposed to the arts and music. "Readin', writin' and 'rithmetic" is not the only foundation of an education. We have two sides of our brain. In short, the left brain deals with logic, sequencing, linear thinking, mathematics, facts and thinking in words. The right brain deserves just as much attention because it deals with imagination, holistic thinking, intuition, arts, rhythm, non verbal cues and feeling visualization. Counseling ? that should be a non starter. You can't eliminate any of those positions. The social situations that these in school providers deal with is mind boggling . They are trying to keeps kids in school because of the social issues some kids deal with outside of school ( poverty , neglect, homelessness, abuse). My own kids fortunately have not had to deal with those atrocities, but they have used a trained counselor (some LCSW) as safe place to talk with someone about problems. Teachers have too much responsibility to be the source for this specialized work. Same goes for college and career counselors. No every kid is laser focused on what they will do once they leave the secondary school. Some have no idea. Some do. To have a resource that offer resources and guidance is necessary. Elective courses introduce kids to possible careers and keep them interested in school and hopefully enjoy their time there. Cutting the positions above won't make for more teachers. Who is going to want to be a teacher if they don't have the support their colleagues provide. with urgency, Karen Izwicki, James Frisque, Tess Frisque and A.J. Frisque

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I recently learned of Elsie's proposal to cut ratios for counseling, library, visual arts, music and more. As a teacher with experience in multiple Montana schools, a graduate of the system, and a mother of children currently in the public schools system, I am enraged, disgusted, and appalled that this is even a suggestion. Teachers recognize that counselors are a vital part of a healthy community. Children are experiencing mental health issues at an unprecedented rate. Suicide rates and attempts are rising. Behavior issues due to mental health impact everyone in school right now, and teachers have been begging for help. Instead it is suggested we get rid of those ratios, potentially eliminating the little help we have. Unacceptable. If anything we should be recruiting and funding quality mental health and behavioral experts to help our children who are so visibly struggling.

[https://urldefense.com/v3/\\_https://schoolcounselor.org/Publications-Research/Research/Impact-of-School-Counseling\\_";!!GaaboA!pchCzgfpqUrqythWznh8OnGiF-](https://urldefense.com/v3/_https://schoolcounselor.org/Publications-Research/Research/Impact-of-School-Counseling_)

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Additionally, the push for "media literacy" and to increase reading scores is real. National reading scores have remained stagnant for decades- but you suggest cutting librarians and children's access to literature and qualified educators to instruct them? This makes zero sense. Librarians are already stretched thin in my district, splitting their time among several schools, unable to devote their valuable time to students to their fullest potential.

[https://urldefense.com/v3/\\_http://Eric.Ed.gov/?id=ED482253\\_\\_;!!GaaboA!pchCzgfpqUrqythWznh8OnGiF-tdPGohpE6pN5pwJI1I5imi1q4zzRgHQfOadfXgPzTFNFbZ6zk3gtw48ZEOBiaHxOscSC4\\$](https://urldefense.com/v3/_http://Eric.Ed.gov/?id=ED482253__;!!GaaboA!pchCzgfpqUrqythWznh8OnGiF-tdPGohpE6pN5pwJI1I5imi1q4zzRgHQfOadfXgPzTFNFbZ6zk3gtw48ZEOBiaHxOscSC4$)  
Studies show that students who participate in the arts do better on standardized tests, have improved social skills, and were more motivated than those who did not or who had no access. Teachers are fighting tooth and nail to make and maintain growth in these areas, and to take away anything that can help a student achieve shows negligence and should not be condoned.

[https://urldefense.com/v3/\\_https://www.onlinecolleges.net/10-salient-studies-on-the-arts-in-education/\\_\\_;!!GaaboA!pchCzgfpqUrqythWznh8OnGiF-tdPGohpE6pN5pwJI1I5imi1q4zzRgHQfOadfXgPzTFNFbZ6zk3gtw48ZEOBiaH1OhK2u4\\$](https://urldefense.com/v3/_https://www.onlinecolleges.net/10-salient-studies-on-the-arts-in-education/__;!!GaaboA!pchCzgfpqUrqythWznh8OnGiF-tdPGohpE6pN5pwJI1I5imi1q4zzRgHQfOadfXgPzTFNFbZ6zk3gtw48ZEOBiaH1OhK2u4$)  
Please listen to educators, and know how valuable these programs are. Please look at STUDIES and make a data-based decision which will clearly point to keeping these programs alive.  
Thank you for your time. Brooke Waldron

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As a 8th grader I highly oppose this recommendation. It can cause students to be unable to get all the resources they need. Students need access to all of the creative arts (music, art, technical education, etc) they can. Taking away this requirement could cause massive mental health struggles and losses of future artists or creativity. Some children have struggles in school or at home mentally that require help they may not have access to. This is why having access to councilors and librarians is a basic mental health necessity and it is important to have enough for the student body. Schools also should have set requirements and classes to have. If you don't have standards for schools lots of children may not get the education they need in order to be a productive member of so society. These changes may make student not ready for high school and the rest of their future. This is why I see the Superintendent Arntzen's recommendations as negative.

I am writing to express opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905, discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee. Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). The problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone. To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, right as Montana's Comprehensive School and Community Treatment (CSCT) program is coming to an end, will surely impact our most vulnerable students with complex mental health needs. Please reconsider. In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state. It will particularly impact our low income and tribal areas. Please maintain the current language and standards for the good of all students. Thank you for your consideration, Lindsay Blackburn Billings, MT

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I am writing to express opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905, discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee. Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). The problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone. To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, right as Montana's Comprehensive School and Community Treatment (CSCT) program is coming to an end, will surely impact our most vulnerable students with complex mental health needs. Please reconsider. In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state. It will particularly impact our low income and tribal areas. Please maintain the current language and standards for the

particularly impact our low income and tribal areas. Please maintain the current language and standards for the good of all students. Thank you for your consideration, Annie Davis Missoula, MT

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Hello, my name is Jordan Krause. I am a kindergarten teacher at Chief Charlo Elementary in Missoula. I've been teaching for six years, and in that time I've taught at a school where most kids had their needs met, a school where most families were experiencing poverty and/or trauma, and a school that is more of a mix. At every school, mental health support and access to a knowledgeable, trained librarian has greatly increased the well-being of my students. The recommendations our state Superintendent intends to bring to your committee today are absolutely shocking to me as an educator. By removing the student/professionals quotas for school counselors and librarians, some of our most vulnerable populations will soon have an enormous uphill battle to retain either. Mental health support needs to be increased in our schools, and approving this recommendation will very likely decrease the number of school counselors in the future, especially in rural areas and districts struggling to make ends meet. Our kids (and communities) are working through a pandemic; There is a lot of trauma, lack of socialization in our littlest learners, and needs that were previously undiagnosed due to lack of early interventions early in the pandemic. Our mental health providers are vital to the well-being of our students and our schools as a whole. Reversing this quota will be detrimental to the well-being of Montana kids and will have lasting negative impacts for years to come. School librarians do so much to keep our schools running. Beyond managing the circulation of the library (a job in and of itself), they are often our go-to people to support and troubleshoot the tech in our building, create extracurricular learning opportunities and community engagement opportunities for our families, and teach literacy and library lessons to the students. Please do not adopt the recommendations put forth by Superintendent Arntzen. They will be detrimental to our kids, our families, and our communities. Thank you for your time and service. Kindly, Jordan Krause

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I was told you are taking input on a proposal to reduce the minimum requirements for school counselors and librarians, and eliminate requirements for elementary & middle schools to offer specific elective subjects like art and music. The arts are ever more important now than ever. Kids will suffer in many ways if schools choose to eliminate these subjects. They are not "extra" — they create the whole child. Libraries and counselors? The news is teeming with stories about the mental health of young people. Let's help our kids please instead of going backwards. Thank you, Brian Schott

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Request that you pass the following input message to members of the Negotiated Rule Making Committee. Anot sure if you recall our conversation of a month ago concerning this message. At that time you suggested I go over Standards to see if schools can and should address the Behavior Health issues which affect 1 of every 5 families in our state- approximately 200,000 Montana citizens. Followed your suggestion, basis of input- thanks. Keep up the good work Bruce Comment to Negotiated Rule Making CommitteeNeed to immediately act to save a drowning child- would be better to have taught the child how to swim.Need to immediately address suicidal attempt- would be better if people/students had knowledge, resilience, and strategies to address Behavior Health issues. Montana Curriculum Health Standards and Health Content Standards provide required opportunity to give students knowledge, resilience, and strategies to address Behavior Health issues. Question: Are Montana Schools diligently following Standards and Content Standards of Health Enhancement? How does OPI determine such? Anecdotal discussions say that schools are making more effort but need much more. Just anecdotal, certainly not enough to make any conclusion. But enough to have me send this input.

I am board member of Montana Eastern Service Area Authority, which represents 28 counties, whose goal is to help improve Behavior Health in Montana. Our emphasis is prevention. Thank you for your efforts on this committee. And thank you for taking time to read this input. Bruce Peterson Valley County Mental Health Local Advisory Council MESAA Board

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I would hope at a time like this we would not be cutting school counselors? Please tell me this would never be considered.

I have been and am a Middle School Family and Consumer Sciences teacher for the last 18 years in Helena, Montana. I see 350 middle schoolers in my classes each year! We give them a chance to explore jobs, careers, college, and vocational choices. We cover vital life skills such as financial education, career readiness, culinary skills, communication skills, and how to develop and build healthy relationships. We, the CTE teachers, are a part of the seamless transition to high school showcasing the College and Career ready pathways. Along with Music, Art, Spanish, and Industrial Arts, we all add practical life skills for middle school students to explore and experience. Please do not let anyone strip our schools of such vital hands-on education! These electives provide the students with lots of practical and sometimes, life-changing experiences. I am shocked and quite frankly, very upset that Superintendent Arntzen would try to eliminate electives that our students need, enjoy, and rely on to understand how the world works! (careers, money management, job interviews, applications, credit scores, savings, investing, electronic banking, choosing vocational schools, comparing jobs, cost of living, living on min. wage, food, nutrition, culinary skills, healthy relationships, how to communicate, etiquette..I could go on....)Please, please do not let this happen to our children! Support electives in middle school! I'm sure parents and students would support us too if anyone would like to ask them! Thank you for listening and please share, Karen Sprott Karen Sprott Family and Consumer Sciences

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My comment is coming in late because I've spent the last hour at my son's school talking to his guidance counselor. He burst into tears in class, overwhelmed by standardized testing and school projects. He needed someone to listen to him and to help him identify what was going on. Our schools need counselors. Every school does, regardless of whether or not their district thinks they do. They can save lives and help address crises. To even consider removing them or making them optional is to turn your back on children. Thank you, Jackie Semmens

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Thank you for your time and commitment to making our schools safe and successful. Thank you for your support for children not only academically, but also mentally, socially, and emotionally. At a time when mental health support is so critical it is important we maintain free, qualified resources for our children. Please maintain the ratio limitations for counselors and librarians. It is imperative we support students and their families. If the standards must change, please consider lowering the ratio so that counselors can meet the needs of more students. Especially students who are at high risk. Montana ranks third in the country in death by suicide and twice as many as the national average for children ages 10-17. This is not the time to pull resources. There probably will never be a time. Having effective resources doesn't just have a positive effect on the individual, it affects families, schools, communities, and the state of Montana as a whole. This is a society issue. Please keep the resources in place. Support our students, they deserve it. Thank you, Shana Berry Brown Substitute Teacher, Parent, and Supporter of Public Schools

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I am writing to you as a concerned school counselor, citizen, and parent regarding Superintendent Arntzen's proposed legislation to remove student to Librarian and Counselor ratios. I work as a school counselor in the most isolated county seat in the state, if these ratios were removed it would open a door for our school board and administration to cut my position. This would take away the sole direct contact for our students mental health needs only increasing the risk of suicide and other mental health disorders in our students. I also devote countless hours to helping our students research careers and apply for scholarships. Our graduating class this year (of 14 students) received over \$100,000 in scholarships as a direct result of the Career class I taught this past semester. These funds have made it possible for them to be able to further their education. Please reconsider passing this proposed legislation. Sincerely, Katie Shawver School Counselor Jordan Public Schools

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Arntzen's recommendations to remove ratios will remove student access to quality library media services and supports from adequate counseling staff in our public schools. She is attempting to gut our current accreditation standards as a way to dismantle public education in our state. She has proven time and again that she is not a proponent of our phenomenal public schools and your committee should not stand by and allow it to happen. Public schools are one of the greatest commodities in our state and Arntzen is the biggest threat to the very system that she is in charge of. Thank you for serving on this important committee, Alli Mitchell

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I am in full support of Elsie Arntzen's recommendations with regard to school librarians and counselors. Eliminating the ratios will NOT "eliminate" students' access to librarians and counselors. It will however force districts to reconsider how to spend the dollars that are allocated for education. A more prudent and conscientious approach to school budgets with the focus on properly educating students will only serve to benefit all citizens of Montana. Linda Sauer Proctor, Montana

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I am reaching out to you to provide my comments to the Negotiated Rule Making Committee regarding the ratios for school librarians and counselors. I implore the committee to maintain the ratios so ALL students in Montana have access to the invaluable resources each service provides. Thank you for your time. Sincerely, Sara Belke

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Please keep the library and counselor ratios! They are an integral part of our students' development! Haendel Zepeda Spanish Teacher North Middle School

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I am against the proposed rule changes for counselors and librarians in our Montana Public Schools by Elsie Arntzen and her task force. These changes are NOT needed and should not even be considered. I have lived my whole life in Montana and believe in our public education system. Unbelievable these changes were even proposed. A suggestion to Elsie and her task force is to find better ways to financially support our public schools. We need to make them better and owe a great PUBLIC EDUCATION to our children. Bridget Gauthier Registered Voter

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Please reconsider the mental health and well being of all children K-12. Which includes a well rounded education in not only the basics but the arts and electives that children need to keep them motivated to go to school. As a retired special educator all children need opportunities to shine. Though some students may not be proficient in math or reading they met thrive in foreign languages, industrial arts, ceramics, music, painting, multi media studies, band, chorus, world cultures, library skills, the list goes on. Not to mention the talented people that provide these courses and inspire student to stay in school. We are just now feeling less pressure from a devastating pandemic. Students need mental health services now more than ever. Counselors provide a crucial service in schools by coordinating programs that help all types of students to perform better socially, emotionally, and academically. Your proposals are devastating to our public schools. All children have the right to a free and public education, including students with special needs, artistic students, athletic students, creative students, students with anxiety, depression, or any other psychological issue. I am devastated that you do not put children first. You would not treat your own family this way please do not treat my family this way. Sincerely, Marta Ernst

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I am a first year doctoral student earning my PhD in Counselor Education and Supervision at The University of Montana. I am appalled that at a time when the mental health of Montana's children health is at its worst, you are consider making it harder for students to access trained specialists. Suicide prevention programs are sorely lacking, and too many of Montana's children take their lives each year. The pandemic proved that our children need MORE support, not less. There is literally NO GOOD reason to consider reducing the number of

required counselors (or librarians). No one asked for it and it will do irreparable damage in the tears to come if enacted. Lillian Martz

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I am writing to express my disappointment with the proposed changes outlined in the latest rule making committee meeting. The voters of Montana have expressed time and again their support for public education. The latest proposed changes represent a partisan attack on a proud tradition of public education by an administration that uses the phrase "school choice" to hide an agenda of destroying the public school system because of its commitment to an impartial education. Any Montanan who is awake to the active destruction of our education system - a system that serves all montanans, not just a select few - should be appalled by the proposed changes. Corey McBain Great Falls, MT

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Please do not remove the librarian and counselor ratios - students and teachers need access to these professionals in their academic settings.

My name is Shena Wald. I am a teacher in Billings School District 2 and a parent to two students (soon to be 3) attending public school in Billings. I am concerned about the proposed language changes to Montana State Accreditation standards. Increasing the staff to student ratio for counseling and library may alleviate some staffing issues, however this will make it more difficult for students to access these education professionals. Further, if the language for required middle school electives is less specific (i.e. no requirement for performing arts/music, foreign language, etc.), students will have less opportunity/access to these rich, creative classes. Please consider opposing the proposed language changes to the Montana State Accreditation standards. Thank you, Shena Wald

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I am going to be blunt. If it were not for my school counselor, I probably would have attempted suicide in 2004. I went to a small high school, my graduating class was 6, and I struggled to fit into the world. If it were not for her, and the peace she provided for me in her office, my life and my family's life would be completely changed. If you make the changes proposed by Superintendent Arntzen, students will be under served. School counselors are already overwhelmed with what they need to do in a day, and it will negatively impact our students if you take away resources that studies prove we need MORE of, not less. Montana has been pushing the idea of College and Career Readiness for years now. If you take away school counselors, you take away what students need to be college and career ready. Who do you think takes students to job fairs? Who often proctor ACT tests? Who sets up and organizes your state testing dates? Who takes students on college visits? Who counsels students when their grades are struggling and need a graduation plan? After everything our students have had to overcome in the last 3 years, I am horrified that this is even a recommendation on the table. We are supposed to help our students. We do that by providing more services, not less. Please do not vote for Superintendent Arntzen's proposed changes. Thank you, Suzanne Flint

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As a teacher who has worked in Montana's public schools for 34 years, I urge you to vote NO on Superintendent Arntzen's proposal to reduce accreditation standards for counselors, librarians, and middle school elective teachers. We must keep our counseling staff for several reasons: Students are suffering from mental health issues at record rates. Teen suicide rates are incredibly high. The state has already cut the mental health budget for schools to the bare bones. Every time we have a school shooting, people say "We need to have more mental health counseling in schools." They never say we should cut counselors. Middle school music and art teachers are also vital. They help students remain engaged in school during a time when many students disengage. Artistic endeavors increase students' academic readiness. Finally, librarians form the cornerstone of a school. They help to increase reading literacy, which is lagging after Covid, and information literacy, which is vital in this time when information is overly abundant, but often not accurate. Thank you, Kim Rott Missoula, MT Kim Rott, Teacher / Librarian Sentinel High School (she her hers)

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I write to first, thank you for your service on the Chapter 55 Committee, and second, to share my distress about the highly concerning and dangerous recommendations from Superintendent Artzen to eliminate the School Counseling ratio in our schools serving less than 126 students and leave open to interpretation who is providing these counseling services. I may not need to remind you of the incredibly high risk of suicidality our students in Montana Schools face. The Office of Public Instruction's own Youth Risk Behavior Survey reviewed and signed by Superintendent Artzen (2021) indicates: 10.2% of youth have attempted suicide in the last 12 months. 83.7% of youth report poor mental health in the last 30 days, with 31.5% indicating that their poor mental health is persistent most of the time or always. School Counselors serve as a frontline response to these and many other critical student needs including drug, alcohol, and tobacco use and other risky life changing behaviors. These concerns interfere drastically with our students ability to learn and grow when within the care of our Public School System. Having trained School Counselors in all of our Montana Schools who are readily accessible and on site daily is especially critical in rural Montana. Rural Montana is often a desert for accessing medical and mental health care. Eliminating the requirement for School Counselors in these high needs areas does not solve this problem, but rather complicates it. Placing less School Counselors or untrained employees in these roles provides no or unprepared service providers to our students that likely have no alternative access to a Counselor. I implore you to address a solution that serves our Montana students. Let's get our Counselors into these high need places, not take them out. Respectfully, Kirsten Murray, Ph.D., LPC

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I am not a trained or certified educator. I am a lifelong resident of Montana, taxpayer, and recipient of an education provided through School District No.2 in Billings. I raised three children who were educated in the Billings School District, all of whom are currently employed in the field of education at the elementary or college level in three different states. I was made aware of the proposed changes to the ARM presented today; and after discussion and review, felt compelled to comment to this group for the first time. I am gravely concerned by a majority of the proposed changes to the rules as presented with the agenda. There are a couple of great items, namely the clarification of Graduation Requirements as proposed in 10.55.905 2(c) adding the ½ unit of Civics or Government and in 2(h) with the ½ unit of economic and financial literacy. These are reiterated in 10.55.904. I am concerned most changes removing specific standards and providing vague rules will have negative unintended consequences for our schools and ultimately our students receiving an education. These consequences could be likened to changing school speed limits to "reasonable and prudent" as our state history has demonstrated the success of that concept. I could quote many of the founders of our country and historical leaders who have followed them about the critical importance of quality public education to the success of a democracy such as ours. I am sure you have heard them all. I hope you will hear them again in your hearts and minds as you consider these changes. As you work to build consensus for these proposed changes, please consider those voices along with the voices of the children we as a community have a responsibility to educate for our future. They will be sitting in your seat one day; and we must provide them with the opportunity to have the resources and tools to be successful as they assume the leadership of our country. Thank you for your service on this committee, your time, and consideration of my point of view. Sincerely, Vicki Evans

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As a life long professional social worker and experienced school social worker I am opposed to any reduction in the ratio of school counselors and librarians. Reducing these services at a time when Montana is highly focused on reducing suicides across all age ranges these reductions are counter productive. Counselors provide vital information and counseling to students and parents from early elementary thru graduation. Librarians are vital to helping students enhance reading skills and research skills. Both of these professions are vital to enhancing student learning in the classroom and lifelong coping skills. Stephen L. Cummings, LCSW

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I was unable to attend the meeting on Counselor ratios last night. I am a social worker, and currently a Faculty of the School of Social Work at UM. I spent 10 years as a school social worker in the state of New Mexico. The needs of youth are great, and in Montana, access to services, specifically behavioral health, are sparse. The

needs for professional workforce to support our youth are large, and our programs in social work are being inundated with requests from agencies, including school-based services, to help recruit graduates and practicum students to serve the unmet needs, Reducing school counselor ratios in a state with one of the highest youth suicide rates is not only foolish. It is cruel. School is where students spend the most time outside of home. It is where they get a respite or a safe place if they live in neglect or substance abusing families. It is where they can count on a meal if food is scarce at home. It is where adults pay attention and provide support. It is where parents can go to seek support for concerns they have for their child, or receive feedback expressing support and be provided with resources. The voices of dissent and disbelief are speaking up loud and clear. This is not the time to reduce school counselors in our state. It is time for leadership in the area of supporting students, parents and families to persist through difficult social problems, with education as a path forward, and support available as needed. Deanna Cooper; LCSW St. Ignatius, MT

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Our public schools need MORE counselors and librarians, not less. They also need access to music and the arts protected. Our kids deserve the best, not just getting by. Sue Schmidt Darby, Mt

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I am writing you to express my disapproval of the changes put forth by Elsie Arntzen. The negative effect is reducing the number of school librarians and counselors would be widespread. These resources are crucial to supplying school age children with support in their learning as well as their personal lives as they navigate the public school system. Is appalling that the value of these foundational resources for public schools are being called into question. I strongly oppose the proposed changes to chapter 55. Thank you, Sophia

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My name is Erin Grummert and I am currently a music teacher in Billings School District 2. I have to say that this has become quite a hot topic in the last 24 hours, which makes me think there has been little consideration as to what the parents and teachers in our state believe is right for the education of our Montana students. I am concerned about the proposed language changes to Montana State Accreditation standards. Increasing the staff to student ratio for counseling and library may alleviate some staffing issues, however this will make it more difficult for students to access these education professionals. Further, if the language for required middle school electives is less specific (i.e. no requirement for performing arts/music, foreign language, etc.), students will have less opportunity/access to these rich, creative classes. What purpose does this serve to the students and their community? Please consider opposing the proposed language changes to the Montana State Accreditation standards. Thank you for your consideration. Erin

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I am a social worker, and currently a Faculty of the School of Social Work at UM. I spent 10 years as a school social worker in the state of New Mexico. The needs of youth are great, and in Montana, access to services, specifically behavioral health, are sparse. The needs for professional workforce to support our youth are large, and our programs in social work are being inundated with requests from agencies, including school-based services, to help recruit graduates and practicum students to serve the unmet needs, Reducing school counselor ratios in a state with one of the highest youth suicide rates is not only foolish. It is cruel. School is where students spend the most time outside of home. It is where they get a respite or a safe place if they live in neglect or substance abusing families. It is where they can count on a meal if food is scarce at home. It is where adults pay attention and provide support. It is where parents can go to seek support for concerns they have for their child, or receive feedback expressing support and be provided with resources. The voices of dissent and disbelief are speaking up loud and clear. This is not the time to reduce school counselors in our state. It is time for leadership in the area of supporting students, parents and families to persist through difficult social problems, with education as a path forward, and support available as needed. Deanna Cooper; LCSW St. Ignatius, MT

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I am writing on behalf of myself, a 4th grade teacher, and my students, to beg this committee to reject Elsie Arntzen's new recommendations to eliminate the ratios currently in place for the number of students to school

librarians and counselors. Both librarians and counselors are essential to the learning and well-being of our students. Mrs. Arntzen's recommendations will do nothing but negatively impact Montana schools, students, families, and staff. In a time when student-teacher ratios are already far too high, and students' mental health is a top priority (and concern), communities cannot, and SHOULD NOT, be put in a position to lose these crucial counselors and librarians from their schools. Please consider the detrimental consequences of Superintendent Arntzen's recommendations. Thank you for your time and consideration.

Lindsey Kuntz

This is absolutely ridiculous! Now more than ever we need to have counselors in our schools available to help our students. Depression and suicide is up amongst our teenage population and you think the answer is pulling counselors out of schools? Many of the at risk students come from low socioeconomic homes and where are they going to get the services they need if they can't get them at school? I am very disappointed to see that Ms. Arntzen is even considering this change! Maybe she should set foot in the schools and listen to the teachers and administrators who actually have to deal with these problems on a regular basis. Our special programs such as art, music, library, and counseling programs are so beneficial to our youth. These are spaces where they can express themselves creatively and freely. Again, children in low income homes won't get these opportunities outside of school and will have no exposure to such wonderful programs. I think it's egregious to cut any of these programs from schools! As a parent, educator, and school board member I am urging Ms. Arntzen to reconsider her current plan and maybe get in the schools and ask the people who work with children everyday what they need the most! I can guarantee you that cutting these programs won't be on the list. Thank you for your time.

Lindsay Witt

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I was a substitute teacher at a small k-8 county school for 8 years. School counselors are vital! And the situation has only gotten worse with Covid and gun violence. Do not make the mistake of taking the ratios away. In fact, they should be improved to 300 to 1 or even 200 to 1. Do more for our schools, not less. Carol Dawes

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As a public school educator of over 25 years, I implore you to reconsider any wording that would cut the school programs that allow our children access to educators and resources (via the library or school counseling programs) that are absolutely vital to their health and wellbeing! Thank you, Kathy Wetsch

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First, I tried an email to the address listed in the Missoulian, but it failed to send (55publiccomment@mt.gov), so I am sending this email to you, instead. I hope my voice is heard. I have lived in Montana all 69 years of my life and am a strong advocate for public education and for children who are growing up in today's complex world. I vehemently disagree with the changes that Elsie Arntzen is proposing regarding the numbers of school counselors and librarians she suggests for MT Public School Systems. Education that is free and available to all children in the state of Montana is the hope and the avenue to preserve the quality of life we live in MT. PLEASE DO NOT ACCEPT ANY OF ARNTZEN'S PROPOSED CHANGES!!!! Thank you very much, Jerri Balsam former Junior and Senior High School English Teacher and former University of Montana Writing Instructor

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Dan, Jon, and I met today, via zoom, to discuss and brainstorm ideas specific to the accreditation process. We are asking for support in a request; knowing fully how hard you are working with us to take a viable solution/proposal to the Superintendent in a timely manner.

First of all, we don't feel that the current process is broken. It is just not designed to truly help all schools improve. If it needs to stay because a better process can't be devised in our time frame, so be it. In reality, we check boxes every fall (so we don't "get in trouble"), and leave the complex and deep work of improvement to the individual schools. I may be wrong, but I don't think this process has changed in several rounds of review

because a redesign is a huge undertaking. We are asking the Superintendent to support an ask from the BPE to develop a yearlong think tank or committee to delve deeply into this. Montana is a diverse state and we need all voices at the table; class(AA-C), tribal schools, special education, legal, universities, etc. We need to continue the research that you guided us to, including reviewing other states' processes on a deeper level (ideally we could visit a state to really hear/see how it works). Ideally, we would like to see something that honors the local control that our state values, but provide standards that accreditation would support, while giving options to meet those standards. The model could even provide a two or three option approach to meet standards that the committee identifies. If done right, this model could also include a multi-year model for schools. Perhaps this is a task for us, perhaps it is one for the Negotiated Rule Making Committee, perhaps it is for another group completely, but it is important enough that it needs the dedicated time. If it needs a tweak, we could probably do it. If it needs an overhaul (which we feel it does), it needs a much deeper dive. At this point, we don't feel that we are able to produce a quality product/proposal so we are tabling our discussion. We value your opinion and would like to hear your thoughts. Thank you for all you are doing, Heather, Dan, and Jon

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My name is Jayna Mumbauer-Pisano and I'm an assistant professor in the Department of Counseling at University of Montana. I have the great pleasure of working with future school counselors who are passionate, committed, and wholly determined to make a difference in the lives of young people in Montana. I strongly oppose the proposed changes outlined in 10.55.710. Prior to COVID-19, 1 in 5 children met diagnostic criteria for a mental health disorder, with only 20% of those children receiving care from a mental health provider (Centers for Disease Control and Prevention, 2019). COVID-19 has only exacerbated mental health struggles for young people, with 71% of parents reporting that the pandemic has taken a toll on their child's mental health and emotional well-being (American Psychological Association, 2022). School counselors are often the only trained mental health providers in Montana schools. Now more than ever, we should be increasing mental health support for young people in Montana by lowering the school counselor to student ratio. School counselors save children's lives every day in Montana schools. Limiting children's access to them at the time they need it the very most is a grave injustice. Jayna

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Throwing my support against any ruling which would allow larger schools in the state to have just one librarian or counselor. Lowering the ratios not a step toward student safety or success. Thanks for the opportunity to comment. Julie Hitchcock Bozeman, MT

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As a recently retired elementary school librarian from Helena, I would like to urge you and the committee to maintain the librarian and counselor ratios in our public schools!

We need more counselors instead of fewer because they play a vital role working with children of all ages who have been through trauma and have needs that classroom teachers cannot meet on their own. They help with behavior issues and teach social skills on a daily basis. They even help procure food and clothing for our neediest students!

Libraries are the heart of our schools, and librarians also play a vital role in our schools. It is not true that "anyone can check out books." Librarians stay up to date on award winning literature, and curate and maintain a collection of books that meets the needs of all the students in their schools. They work with staff members to provide materials that meet the needs of their high, middle and low students. They teach library skills classes every day including research skills and technology. They promote the love of reading and life-long learning. Research shows that students have higher reading scores when their schools have full-time librarians. Thank you for your consideration, Lynn Trenary

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I am writing in Support of Maintaining Librarian and Counselor Ratios. I am against Superintendent Arntzen's proposed changes. We must maintain full access to art, music, voice, science, social studies, mental health and career academics. Best regards Molly Bradford

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Good afternoon. As a Bozeman citizen and Montana State University alumna, I implore you to keep the librarian-to-student and counselor-to-student ratio requirements for as many schools as possible. I understand that many rural schools cannot maintain this, but please allow them an exception - do NOT make this a rule. I had deep, impactful relationships with the libraries and mental health facilities at MSU while I was a student. I worked for the MSU Library through the work study program for three years, and I quickly learned how integral libraries and their faculty and staff are to a thriving and knowledgeable student body. The multitude of resources and materials, as well as research assistance, were vital to my success, and on a personal note, my time spent at the library were some of the most stress-free and liberating during what could sometimes be a difficult semester or school year. The library and its wonderful staff were like a second family, and I am so grateful for their role in my education. I'm sure thousands of students and community members could say the same. Because of those difficult semesters, I had a mental breakdown during my sophomore year that led me to school's health facilities and a kind, patient counselor who helped me work through my stressors and guided me on a path to being a better student and community member. But even then, mental health resources were stretched thin, and I was lucky to get an emergency consultation when I needed one. You would know better than anyone how stressful and demanding schooling of any level can be, and cutting necessary mental health staff will lead to a decrease in performance, an increase in dropouts, and a decrease in the overall health and happiness of the student body. Now more than ever, librarians and counselors are some of the most critical members of a school's staff. They provide that essential assistance, attention, and compassion that is so important for young members of our society to have in this chaotic time of their lives. They are a human face to what can often be perceived as a cold, academic world. Please dismiss the call to remove librarian/counselor ratios in schools. Thank you. Aubrey LaBarre She/Her/Hers

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I write to oppose Superintendent Arntzen's proposed changes to the Chapter 55 ratio of librarians to students in Montana schools. School librarians help foster excellence in education for students across varying backgrounds and needs. Maintaining the ratio - is the wisest, healthiest, and most supportive decision for our cherished students. Local control in education is significant, but if school librarians are eliminated, it basically eliminates the library! Libraries, and librarians, are lifesavers for many students—me included. In Great Falls Public Schools in the 1950s and 1960s, my librarians soon knew how much I liked "current events"—starting in grade school—and helped me find resources to nurture that passion. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. Yours sincerely, Robin Biffle

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I feel it's important to keep the current ratio of school counselors and librarians. My daughter is a kindergartner in the Bozeman School District and some of the kids with major behavioral issues see the counselors regularly and have to be monitored by the counselors to keep other kids (including my daughter safe.) Thanks for listening, Mary Bentley

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I would like to share with you a situation that occurred with our family. My daughter is currently a 2nd grader in the Billings Public School. Last year, during her 1st grade year, she had a friend in her class that had a brother, who was a middle schooler, commit suicide. Further this friend's parents were in the middle of a divorce. My daughter felt sorry, wanted to console and help her friend as she was worried for her. This friend would have breakdowns during school day, she would need to leave class and rightfully had struggles dealing with her family situation. My daughter had so much worry and stress about her friend that it physically and mentally caused her to struggle with her own emotions and caused her to struggle and fail to keep up at school. We (my husband and I) had to request school counselor to assist and help my daughter, acknowledge her feelings but also recognize that it's her friend's feelings and work through the issue. The issue was that the counselor works between two elementary schools in Billings so although we needed

assistance we had to wait several days and over a week until she was available in our school and had availability in her schedule. During the wait, my daughter was having panic attacks, she was attempting self harm, hitting herself, throwing tantrums, emotional imbalance and more. All behavior that are not normal for her until this situation happened with friend. Once we were able to address with counselor's assist and my daughter was coached the tools she needed to work through, we have had no issues. If you do not maintain the current ratio (which is already a strain on the current staff) we will have bigger problems. These counselors may have to split time between 3-4 schools vs 2 schools (each approximately 400 students) that they currently have assigned to them. They are already stretched thin on Children's individual needs but also the schools needs. Our teachers and principals are not trained. In my situation teacher and principal meet with me and discussed behavior and talking positive to my daughter until she could be seen by licensed counselor however, they are not trained and simply doing the best they can.

If we do not maintain the current ratio, we will have bigger issues with students mental health, well being and possible more suicidal thoughts, attempts or worse yet completion in the attempt. In fact, We need more Counselors to help support our youth. We need to build them up when they are struggling, provide them with the tools to maintain healthy boundaries and skills to become successful citizens in our community as they become adults. The current ratio already stretches Counselors to meet the needs of our youth. Not maintaining the ratio, at minimum, will only harm us not help our children and young adults. Please consider maintaining the current ratio on counselor per students in Montana. Melissa Sider

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Will you please reject the changes proposed for public schools. Students need these services Alice Fischer.  
Retired teacher

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It is unconscionable to reduce the already underserved students who need mental health services. This reduction proposed by the so called superintendent of public instruction is harmful at the least and an abuse of her authority. How can she justify this cut! I beg you as a mother, a woman whose rights are being sorely tested and a long standing Montanan do NOT cut this service from schools. These children NEED this support. Susan Naïve Bigfork Montana

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It would be a huge mistake to eliminate the programs you have mentioned. There is a huge need for school counselors with all the mental health issues. Also kids need other avenues such as music and fine arts to get a well rounded education. I believe students need elective programs to remain interested in school and to succeed in all their core classes. Chris Grabowska

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I am writing to you on behalf of the Agriculture Educators of Montana. Please do not move forward with the Chapter 55 proposed revisions. In today's post covid schools, students need a strong support system which includes a licensed counselor available to them at their school. Montana is one of the leading states in suicide rates. The Montana education system should be looking for ways to support our students' mental and emotional health, not making it more difficult to access these professionals.

Additionally, the Agriculture Teachers of Montana do not support the change in language to the graduation requirements. Students should be required to take State recognized classes including; Career and Technical Education, Art, Math, Social Studies, Science and English, "equivalent" classes do not suffice! Please do not support the proposed changes to Chapter 55. Do not lower the bar for student achievement in public schools in Montana. Kristy Rothe President- Montana Association of Agriculture Educators

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I am against the unnecessary change to "Chapter 55", the rules about the ratio of students to school librarians. The current ratio has been in place for over 30 years and is working. I am against the unnecessary change to "Chapter 55", the rules about the ratio of students to school counselors. Today's adolescents face multiple stressors and need access to more counselors and academic guidance, not less. Shelley Eisenrich

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I am writing to voice my opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. The Lone Rock School Counselor, who I work very closely with, is one of our school's biggest assets. Especially in a small district like ours with 200 students, she wears multiple hats each day. Recently we have experienced a significant increase in mental health challenges amongst our students. We have more students suffering from depression and anxiety. Our truancy rate has skyrocketed. We have students talking about suicide. Our Counselor is our number one support for these kids. Our Counselor also provides backup to our Superintendent in discipline matters because we don't have a Principal. Our Counselor is our first responder to school crises. Teachers are already buried and our Counselor is their saving grace allowing them to be able to move forward with instruction when a student is suffering. Please don't let Superintendent Artnzen tragically affect our students by eliminating the Counselor to student ratio. Sincerely, Marcia Bloom

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I'm writing to communicate my opposition to the proposed elimination of required school counselor/student ratios. At a time when mental health challenges among adolescents in the United States are at an all time high, I cannot fathom why our state superintendent would be considering reducing the number of mental health professionals in schools. Montana consistently ranks in the top 3 in the nation with regard to suicide rates, and our most recent Youth Risk Behavior Survey data indicates that nearly 22% of Montana's high school students have seriously considered attempting suicide in the past 12 months. These statistics are staggering and should be alarming to Montana's state education leaders. A change to required school counselor ratios would disproportionately impact Montana's rural students, who already have a lack of access to mental health resources in their communities. Schools are often the only place that kids can receive the critical services they need. A decision to eliminate the school counselor/student ratios would be very detrimental for kids and will add to the burnout that those who work in education are already experiencing. Please let Superintendent Arntzen know that there is no support for this change amongst public school teachers, school counselors or administration. Anyone who works in Montana public education knows this proposal is misguided, and frankly, dangerous. Thank you for your time, Dacia Luedtke School Counselor

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I am writing this with disappointment as to what you are about to do. Please you have no right to ruin my two boys lives for taking away things that matter. Our world is changing daily and they need all the librarian, they need music this opens up a whole new world for them. And counsellors are needed more today than ever Please don't do this I beg Concerned mom Lu Borhan

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I disagree with the proposed amendments. Properly educated students will be the backbone of our nation sooner than we think. -Deb Bender

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I write today in strident opposition to the proposed rule changes regarding libraries, counselors, and curriculum. School libraries are essential to providing students communication, analysis, and critical thinking skills. They are information centers, learning hubs, and places of support and community. They provide quiet spaces, access to technology, expertise in research, and insight. The proposed rule change will devastate the opportunities and spaces that students need. Similarly, students need access to counselors that they know and trust. Even before the pandemic, the presence of a counselor to provide guidance, strength, and support was essential to every student's well-being. My children both relied on their school counselors throughout their elementary, middle school and high school years. The excellent support they received in the face of bullying, anxiety, and academic struggles was invaluable. I honestly don't think my son would have survived, literally survived his school district education without having unlimited access to in-person school counseling. Please do not pass this rule change. It places students at risk. I don't even know where to begin with the proposed rule changes regarding credit requirements. The changes gut the requirements and are particularly severe regarding art, music, social studies, and earth sciences. While I appreciate the need for some flexibility, these

new rules would be devastating to our students' most basic educational needs. Please maintain the elective and credit requirements as they stand and do not pass these proposed rules. Sincerely, Kate Hampton

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Last year I retired from my position as a speech-language pathologist. I spent my career working in rural schools including Browning, Babb, Lewistown, Harlowtown, Grass Range, Geyser, Winnett, Roundup, Melstone, Lavina, Hays, Lodgepole, Ryegate, Stanford, Geyser, Raynesford and several Hutterite Colonies.

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My experience in these schools is what calls me to strongly oppose Supt. Arntzen's recommendations for School Library Media Services and School Counseling Staff. We should continue to strive to improve all services to rural communities as the school is often the center of the community. These students need access to information and mental health services at the same level as our larger communities. In some cases, they need even more support. Every one of the schools I served suffered at least one significant tragedy over the years from suicides to car accidents. Every one of these schools had students striving to make their place in the world, a world that requires access to media and information. Thank you for your attention to this matter. Sincerely, Rachel Stansberry, MA CCC-SLP

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I am writing to you today requesting that you maintain the current ratio of Librarians and Counselors in Montana Schools. Both Library Media Specialists and School Counselors play a vital role in our schools. I have served as a Teacher/Librarian in Montana for over 30 years. In that time, I have seen the role of both Librarians and Counselors increase. The current ratios for these positions are at best, a minimum. Schools with certified librarians and an up-to-date library provide students with a safe space, teach students how to find appropriate resources both online and in print, and encourage lifelong skills important for future success. Not only do librarians perform these important tasks, but they have become the technology specialist in many schools as well. With an increase in the use of technology, rural schools would be lost without this important resource. More and more our students are in need of mental health support. Without trained Counselors to give them that support, students are unable to learn and retain their coursework. Both Librarians and Counselors perform roles vital to the whole child. Please maintain the ratios between students and these important professionals Thank you, Jane Mason

I am writing to express my support for school counselors, librarians, and art teachers in our public schools. These positions and what they teach our children are essential for a child's well balanced education. Superintendent Arntzen's recommendations to change school accreditation standards is an attack on our school system and the quality education that our children deserve. We must maintain the librarian, counselor, and art teacher ratios in our schools. It's outrageous to suggest otherwise.

Thank you for your time, Rachael Mintkeski

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I can not urge you strongly enough to reject Superintendent Arntzen's recommendations regarding school counselors and librarians. Please also reject the recommendation of striking the language regarding elective programs and credit requirements in middle schools. The students of Montana deserve better and will be hurt significantly by these changes. As an educator and a mother of a middle and a high school student, I cannot imagine the landscape of schools as laid out by these detrimental recommendations. Mrs. Lynette Stortz

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I strongly oppose some of the proposed revisions to school accreditation standards scheduled for discussion today. Specifically, I oppose the revisions to ARM 10.55.709 that eliminate the ratio rules for licensed and endorsed library media specialists. The proposed revisions will reduce or eliminate access to school librarians for many students in the state. Meaningful use of a library is critical to a public school education. Students in rural and less prosperous districts will be impacted most by this revision. Those students already suffer from insufficient resources to adequately prepare them for success. This proposed revision only exacerbates that insufficiency.

I oppose the revisions to ARM 10.55.710 eliminating ratio rules for school counselors for the same reason, specifically that it will adversely impact students in rural and less prosperous districts the most. Finally, I oppose the elimination of visual arts, music, career and technical education courses, world language and exploratory courses from the curriculum for middle school grades as proposed in the revisions to ARM 10.55.902. I believe the topics to be eliminated are necessary to a well-rounded education. I am also concerned that at-risk students may be hurt most by this change. Different individuals thrive under different circumstances. Removing these options for certain students will reduce their opportunities for success.

Respectfully submitted, Lisa Kay Rehard

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It is with a heavy heart that I even feel the need to write to you today. I am a parent of two school aged children in Montana. I am a native Wyomingite (although now a Montanian!) and cherish this place we call home. Montana was once a much more "purple" state - with a healthy mix of conservatism and good common sense. The new rules proposed by Superintendent Arntzen are not only not good sense, they are hurtful, disrespectful and downright negligent for our youngest Montanians. The loss of endorsed literacy experts in each school, i.e. the beloved school librarian, would result in lower reading and writing scores, which is counterproductive to stated goals for improvement. Changing requirements such as music and art for elementary and middle schoolers runs counter to the 2015 ESSA which requires a 'well rounded' education, specifically including arts and music. Every elementary and middle school student in our state, including my student, should have access to these subjects in school. Especially following a worldwide pandemic, why on Earth would we gut student's access to counseling? Especially now when a student's well being is such a wide spread and pressing need? Teachers are not trained counselors. We need to find solutions to the teacher shorters that don't sacrifice a student's learning opportunities. Once FTE is eradicated from school accreditation requirements, it will never come back again. That is shouting loud and clear that what specialist teachers offer in the Montana education system doesn't matter. I urge you to consider what we offer each and every child, as a well rounded student. Rural or not, we can and should offer the very best and brightest this country has to offer. But if you vote to gut the standards, you have voted to take away opportunities for all Montana kids. Sarah Nicholas, MOTR/L Pediatric Occupational Therapist

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I am shocked at the sweeping changes proposed by Elsie Arntzen. My family moved to Bozeman nearly seven years ago and were delighted by the high standard of education in the Bozeman School District. As of next month our family will hold three diplomas including honors diplomas from Bozeman high school. My children have had a wonderful experience during their time here. Each one of my children has participated in the orchestra programs at their school, elementary, middle, and high school. They love to read and have gotten to know the librarians in their search for new books. School counselors have assisted them in many ways and on many occasions. These people and programs fill a need that we can't afford to lose. My kids aren't athletes. Music is their extra-curricular activity. Music is where they have fun in school, make friends, and feel like part of a team. They would not find that any other way. The library is often a refuge on a tough day. Librarians provide a valuable service and bring a level of knowledge and experience that other staff do not have. The councelors in our schools are already spread too thin and it is a huge mistake to cut that connection from our students during a national mental health crisis. We need their expertise looking out for all our students. I come from a family of teachers. I know what it takes to get that credential and to keep it. I've seen the work that happens at home and on weekends to make sure lessons are ready. I've seen the personal expenditures teachers make to get something they need for their classroom. Don't tell them that the work they put into their degree is worthless. They already work for less pay than they deserve. Reducing graduation requirements will make our diplomas not worth the paper they are printed on. Our students deserve better. We need teachers who are trained professionals, counselors who are not overworked, librarians ready to share their love of learning, and Music and art programs and teachers who can ignite passion in our students. Education isn't one size fits all. I thought we would have learned that by now.

If the problem in keeping these positions and programs is funding, then we need to re-examine our tax laws. They are antiquated and not keeping pace with our growth. Find another way that doesn't punish our students. It's time to get creative and keep the kids' best interests in mind and in heart. Marianne Schmidt

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As the mother of a child in Montana Public Schools and a longtime volunteer in our public schools system, I'm writing to voice my vehement disagreement with cutting any funding used to provide counselors or mental health services in schools. After a pandemic where children experienced so many hardships, it is unconscionable that this would even be a consideration from Superintendent Artzen. That is deeply troubling to me. Additionally, it is no secret that we have a mental health crisis in this country- we need look no farther than the 200 shootings carried out so far THIS YEAR. I am a strong proponent of fiscal responsibility, but not at the expense of our children's well-being and mental health. Thank you, Hannah

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In response to the proposed changes to the Montana Accreditation Standards where it concerns libraries, I would like to voice my strong opinion that these changes would not yield a positive change, and should not be instated. As a K-5 teacher librarian in Montana, I see 650 students per week during which time I support education from multiple disciplines. Students in the library receive reading advocacy, instruction on media literacy, and time to create projects based on explorative learning. The library is a space for some to be creative, some to escape into a book, and where learning compliments and cements what classroom teachers are teaching. The library is a place where rigorous instruction is implemented, as well as a place where students have space to follow their interests and drive their own learning. Over the school year, I work to curate a book collection that specifically suits my student population. I advise readers on what books might work for each person specifically. In addition to handling student needs and curating the collection, I assist the teachers in finding appropriate supportive materials for specific classroom instruction. To cut school librarians in the state is a mistake that will cost many children enriched, pleasurable learning. For many students, the library is a safe place. To limit student access to qualified, dedicated and caring librarians is short sighted, and benefits no one. The cost associated with maintaining the current levels of required library staff pales in comparison to the possibility of producing underdeveloped students who may not have learned to ability to think critically, and whose curiosity may not have been piqued to the point of becoming lifelong learners. Additionally, please do not lower student access to counseling from its current state; students' mental health needs support to develop healthy, high-functioning individuals. Likewise, middle schools should retain their current level of availability to the fine arts curriculum; these programs are what makes education a positive experience for many. Respectfully, Ginger Norton

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I urge you to disregard ALL of Superintendent Arntzen's recommendations for changes to accreditation standards for school librarians and school counselors and her proposed changes to use generic language for middle school electives. 1) As a special educator supporting students with diverse learning needs, the value of libraries is crucial! These are ways that students (of ALL levels) can learn about the world around them, view new experiences and places, hear new ideas and voices and become citizens of the world. Shrinking the availability or limiting student access is not what should be happening. We need students to connect more to each other and their communities. One way to ensure that our Montanan students grow up to be ready to participate in the changing world is allowing them access to school libraries. All students need equal access to school libraries! 2) As a special educator in Montana, I cannot express the extreme high level of need for students dealing with mental health in our schools. Limiting access to school counselors limits the access for students with these needs. There is nothing wrong with seeking help when you are depressed, struggling with anxiety, or other big emotions. The counselors at schools teach coping skills, ways to build friendships, support students as they work through grief (loss of friends or family members), deal with bullying and plan for life after high school. Our students need more access to these professionals--not less! All students need equal access to our school counselors! 3) Why in the world would we want to limit the options and exposure to types of classes that students can be taking in middle school. At the high school level, students need to have visual and performing art and Career and Technical art credits to graduate. Again, why are we not wanting our Montana students to learn about a variety of options for their future? It is important for students to have equal opportunities and access to courses across Montana. That means any middle school student should have access to art classes, music, career/tech ed, and world language/cultures. Again, our public schools are shaping the next generations of Montanans. In order for our future to be bright we need to support the

development of our students to be well rounded citizens and support them as they discover their individual interests and ways to be successful! It is imperative that our public schools strive to make all opportunities and access equal across the state--Superintendent Arntzen's proposed changes limit those equal opportunities and therefore, her recommendations must be rejected. Thank you for your time. Rachel Corcoran Special Educator

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Please don't further cut our small schools. It is these small area schools that make us who we are, Montanans. And not someone, somewhere else. Thanks, Tom Rue

As a Montanan parent and a pediatrician, I strongly oppose decreasing the number of librarians and counselors in our schools. Both librarians and counselors provide critical support for our students. We are in the midst of a serious mental health crisis among children and teenagers. Reducing the number of either would have serious detrimental effects. Montana already has the highest suicide rate in the country. Decreasing the number of librarians and counselors in our schools will only further cement that statistic. My own children have relied on both their wonderful counselor and librarian. Our counselor has helped our family through crises and been a constant touch point. Our librarian goes above and beyond to create a safe haven for students by sponsoring afterschool programing in addition to teaching them to love books and reading. These individuals are as important to the health, well being and education of students as their teachers are. Please tell Superintendent Artzen NO and DO NOT support this suggested rule change. Sincerely, Erin M Allen, MD

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As a teacher in a small, rural school I would like to voice my concerns about the changes suggested by Superintendent Artzen. I am very concerned about the suggested changes. Our students need to have as much access to school counselors as possible. There are many students who desperately need those services. If the requirement was changed I am afraid many students would go without the needed services. This also puts a bigger burden on the counselors. They are already very overwhelmed trying to help the students that need assistance. I would hate to see the amount of services offered be reduced due to changing regulations. Library is an important service for children to receive in school as well. Many students do not have access to quality books at their homes so they need to have the ability to read them and check them out from school. Librarians are also a great resource for teachers and students as well. Please keep the currently regulations in place so that our students don't lose access to critical services and their providers become even more overworked!! Thank you, Caitlin Teini

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I write to express my opposition to Superintendent Arntzen's proposed changes to Montana school accreditation standards and the removal of minimum requirements for school counselors, librarians, and middle school electives. I believe these changes would be a disservice to students in Montana and I feel strongly that the proposed changes should be rejected. Respectfully, Eric Halverson

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Please, for the sake of my grandchildren and all the other children in Montana, do not accept the recommendations of Superintendent Arntzen. Not having a librarian in each school is saying that reading and children are not important. Librarians are there to teach, to help the children and faculty find resources, and to acquire new resources. They are the keeper of the books and resource materials. They do so many valuable and needed tasks in the school. Not having enough counselors is saying that the children are not important. Often, especially in today's world, the children are coming to school broken. They need emotional and mental care before they can begin to learn in the classroom. The classroom teachers can not do everything. The schools need these vital people to ensure that our children and grandchildren become healthy, educated, well rounded, and productive citizens for the future of Montana. What you decide will tell how much you care to invest in the children of Montana. If it is a question of money, then cut out people at the top. The faculties in the schools are already stretched to the limit. Sincerely, Beth Mills

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Superintendent Arntzen is continuing her goal of destroying Montana's public schools. I do not know what mission statement she follows but it is certainly not the one she swore an oath to when elected. "To provide vision, advocacy, support, and leadership for schools and communities to ensure that all students meet today's challenges and tomorrow's possibilities," has, under her lack of leadership, been flipped on its head. The following accreditation standard changes that Superintendent Arntzen is proposing must be strongly REJECTED:

1. The mountain of research that supports vigorous and increased mental health counseling for students emerging from the pandemic is a no brainer yet Arntzen proposes eliminating the current counselor-student ratio leading to such a reduction in staff that these services are rendered ineffective.

2. Her next swipe of the axe eliminates the current ratio for school library media services. Throughout my personal education and 35 year career as a teacher, the relationship with librarians and the services they offered were essential to the growth of my students as well as myself. Case in Point: In 1994-95, I was one of only three teachers selected out of a list of 40,000 candidates to participate in the National Science Foundation Teacher In Antarctica Program. I spent two and half months in Antarctica assisting in multiple scientific research projects. With the strong support of the Helena School District Library/Media center, I was supplied with the first consumer digital camera ever offered, an Apple QuickTake 150. The device had been released earlier that year (1994). With it, I took photos of the frozen continent, penguins, labs, scientists, glaciers, seals, tents, outposts, machinery, and geology. Working with the newly set up internet and IT specialists at McMurdo Base, I sent the first digital images from Antarctica to the US, not just anywhere in the US but to the library of Helena Middle School. Without the hard work of the HMS librarians, this pioneering opportunity for students would not have happened. My role was easy, take the camera and the photos but the success of getting a transmission line from Antarctica to Helena, Montana in 1995 was daunting. The internet was in its infancy and the lag time between transmission and reception could be 10-24 hours. The route the digital images took involved several satellites, radar stations, New Zealand, Japan, Hawaii, Reston, W. Virginia, University of Montana, and finally Helena. It was the librarians and the school library that brought Antarctica and its importance to middle school students. The Superintendent erroneously paints the picture that a central library is not necessary for education or librarians; I say she is absolutely wrong.

3. The massive changes Arntzen is making to requirements for middle school education as well as changes to music, art, foreign languages, exploratory classes, and career and technical education must be rejected. I can't help but infer that this slash and burn campaign is an attempt to deprive public schools of their designated funding in order to funnel the money to private schools. Superintendent Arntzen's vision for public education is myopic, deleterious, and dangerous. Montana students, parents, educators, support staff, and administrators deserve so much better.

Sincerely,  
Jim Schulz

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I am writing to voice my opposition to Superintendent Arntzen's proposed accreditation standards changes for library media services and counseling staff. These proposed changes, as well as others submitted by Superintendent Arntzen, disregard the recommendations of the advisory panels and will harm students in Montana. I have been an educator in Montana for 24 years. Library media specialists are essential to the success of students in many curricular areas. My high school English students would not have been successful researchers and writers of research papers were it not for the instruction they received from my school's library media specialists (LMSs). They are the experts when it comes to different types of research formats, which I was not as an English teacher. This holds true for other curricular areas as well. Teachers rely on LMSs for many things, especially when it comes to technology. My district's schools would not be able to function properly without our LMSs taking the lead on assisting students, parents, and teachers with technology needs throughout the pandemic, and this continues now that almost all of our students have devices. Most districts cannot afford to employ tech departments with enough technicians to be in every building, so much has been added to the plates of LMSs for such support. People who are not involved in the education system have no idea what these professionals do on a daily basis, and it is sad that some involved in the education system also clearly do not understand this. The fact that anyone thinks it is a good idea to cut school counselors after the last two years, knowing how much our young people are struggling since the start of the pandemic, is beyond alarming. Much like LMSs, school counselors wear many hats. 400 students -- the current number per school counselor -- is incredibly difficult for them to manage. Removing the 400:1 ratio and leaving it open to each "system" to set its own numbers is a disaster in the making, and the victims will be our students. Making

these cuts will only lead more students with emotional struggles to not receive the help and support they desperately need. How is this helpful to anyone?

Additionally, the vague language in these proposals is also problematic. By saying each "school system must provide library media and information services..." and "a counseling program for (P-12) students" and then cutting out the ratios is alarming. What exactly constitutes a "school system"? Is a school district with 12,000 students considered one "school system"? If so, is that district only required to have one library media specialist and one school counselor? Without the ratios, it seems to me that the answer is yes. Anyone who thinks this is good for anyone seriously misunderstands our education system. Thank you for considering my perspective on these issues, and please, for the sake of our students in the state of Montana, do not approve these harmful proposals from Superintendent Arntzen. Kelly Stoner

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, 10.55.905. I have been a public school teacher for over 10 years. Eliminating appropriate ratios for school counselors in Montana will reduce students' access to mental health services. Our most vulnerable students as long as the general public greatly use and rely on these services to help them through their schooling years. Montana has one of the highest rates of suicide in the country. Reducing this availability would be detrimental to the youth of our state. I can not express enough how vital these mental health specialists are to the families, students, and staff who get to work in their company! Also, I believe that the changes recommended for library and middle school electives would be completely destructive to our student's education. Electives offer students the availability to learn about the new information that interests them and oftentimes leads them into a future career path. Quality library and elective programs are inclusive to everyone, teach students how to think critically, and promote lifelong learning skills in our youth. Maintaining the current standards in these areas is imperative to allow students higher education opportunities. Sincerely, Courtney Burrington

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I am quite concerned with Superintendent Elsie Arntzen recommending major changes to school accreditation standards. As a school librarian and mother, I do not understand why this is even a concern, or why it needs to be changed. The students in Montana will suffer and not progress to be productive members of society. Librarians, school counselors, and arts (visual/ musical) teachers go through much schooling to be the best in their jobs to help them do what is best for the students. The accreditation changes will negate their education, their talents, and their skills, and their jobs. Not just anyone (parents, social workers, hobbyists) can be teachers in the above fields. We, as a state, need to move academically forward, and the proposal is just pushing the students and our society backwards. Please do not even consider accepting the changes to the school accreditation standards School Library Media Services, 10.55.709, School Counseling Staff, 10.55.710, and 10.55.902 Basic Education Program: Middle Grades. Lydia Perry

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...Specifically regarding accreditation standards; this is ABSOLUTELY unacceptable under any circumstances. How can any rational, thoughtful, educated human being of sound mind determine that eliminating educational opportunities for developing students is a move in a positive direction toward an enlightened, thriving culture? The entire point of having a system of education available to Montanans is to broaden minds, enhance and nurture intellectual growth. Arntzen's proposals will ONLY work to break down an already vulnerable system and will be an utter disservice to Montana's children.

Also worth mentioning, this looks very much on its face as a cheap ploy to devalue Montana's public education system thus making room for, and actively encouraging a private, for-profit system as the only avenue for obtaining a broadly enhanced education. Education MUST be available for ALL Montanan students in an environment and format that is both equitable and equal, offering each student similar potential for success. To be clear, Arntzen's proposals are complete rubbish, having no merit, and must be soundly rejected. Thank you, Brad Davis

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This seems like a terrible idea to me. Can you please explain this rational? Sincerely,  
Margret Bennett

Please know I am not in favor of Superintendent Elsie Arntzen's proposed cuts in Montana accreditation standards! We need to continually support our school systems and find a way to do it! A few examples: Cutting requirements for accreditation is another way of saying what specialist teachers offer doesn't matter to a student's education. Why gut student's access to counseling? Especially now when student well-being is such a wide-spread and pressing need? Teachers are not trained counselors. Elective courses keep students in schools thus improving graduation rates. Respectfully, Karen Schmidt

I am adamantly opposed to the recommended changes by NRM to ARM 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905. Please do not make such drastic changes which compromise Montana's rural schools, which make up 74% of Montana schools and 95% of our districts. Do better. Thank you, Maddy Mason

Our family STANDS with school counselors and librarians, as well as student's mental health and study needs. We are against the plan to remove student ratios for school counselors and librarians. Sara Wald

I am writing this email to show my support of the counseling services GFPS currently provides to their students and I am highly disturbed to hear that our superintendent Elsie Arntzen is considering removing such programs from our schools. Our community has experienced so much grief already at the loss of teenagers from our community for mental health disorders and the lack of support for teens/kids experiencing sadness and grief.

Here is a synopsis of why I as a parent feel there should be no cutting of funds for mental health and library services for GFPS students; if this can be anonymous I would appreciate it very much: I have a sophomore at CMR and an 8th grader at North. [REDACTED]

[REDACTED] We as parents were heartbroken, lost and scared dealing with such sadness from our teenager and our lack of knowledge at the issues our teen was facing. With the help of the vice principal, student counselors at CMR and a local therapist that is integrated into the school system, we were able to give our teen the strength to face school after being out for the mental health stay. Our teen needed daily encouragement for a while and they were able to seek out the counselors for refuge and guidance on the really tough days. As you probably know, navigating something this unknown was very difficult on our family structure, but the school was there EVERY step of the way. They offered counseling to us as the parents and were fully engaged in doing anything and everything to ensure our teen was safe.

Without the daily, weekly, monthly support the school offered, the constant check-in's, and phone calls home to touch base with us; [REDACTED]. They stepped in when they saw the seriousness of our teens troubles and were relentless in making sure our teen had all the resources, as well as a physical person to contact in a moments notice. I am forever grateful to CMR staff for their support and care of our teen. I 100% am fully in support of keeping our teens/kids safe and I highly suggest re-evaluating the pure disaster it would be to remove these services from the school. Thank you for your time and understanding on the issue at hand. I hope this email is received well and please just know

the email was written with sincerity from parents whom understand the scary, unfortunate issues our teens face internally each and every day. Thank you again for your time! Jinnie Nichols

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I am emailing you in concern for the recommendations Arntzen is proposing, especially in regards to the availability of school counselors for our youth. According to Montana's Department of Health and Human Services, from 2009-2018 Montana's youth suicide rate was double that of the nation's. During 2019, 1 in 10 high school students reported attempting suicide. We're in the top 5 for suicide rates of all age groups in the United States. Why would we seek to increase these numbers by restricting access to a school counselor? 1 counselor for every 400 students? That's a ridiculous ratio that shows the lack of empathy towards students who are enduring trauma at such young ages. In addition to this, I am extremely concerned about the proposal to strike access to music, visual arts, career education, world languages, and other exploratory courses. Don't we want our future generations to look towards STEAM careers? Don't we want these generations to explore the possibilities of the paths they could take at the university level? Why would we block access to these opportunities for our middle school students? Do we want to express to these young minds that we truly do not care about their academic or future interests? That they should not have a specific choice for electives and therefore, no enjoyment in their education? Please reconsider these proposed recommendations. Respectfully, Maggie Sherrill

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As a retired educator and administrator (32 years) and a current literacy consultant, I am appalled at the recommendations that Supt. Arntzen is bringing forward regarding library media and counseling accreditation changes. After working tirelessly to recover from the abrupt changes to the way we had to educate students during COVID, teachers are finding more and more students with SEL challenges that effect every part of their learning. Taking away counseling hours would be detrimental to these students. Please also consider the SE challenges the teachers have been facing. The counselor is often an ear for coworkers too. Montana students deserve better, and currently, Supt. Arntzen doesn't seem to be putting students first. Reading instruction has become harder, and our library and librarians have become more important than ever in helping students find their way. Navigating through school is tough, and so many students find solace and comfort in books. We simply cannot reduce the number of hours needed for library media services in our schools. Please realize that all of the recommendations seem to be putting students last, not first as Supt. Arntzen likes to claim. Thank you, Susan Sweeney 2017 National Distinguished Principal Retired

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It is astonishing that in an age of intentionally created false information, deepfake videos, misleading AI bots and so much more that the Chapter 55 Negotiated Rule Making Committee would even consider sweeping rules that eliminate the ratio for school librarians. If anything this committee should be revising the ratios to increase the number of librarians per student. In a school district that has elementary schools with close to 500 students it is amazing to see the impact one school librarian has on the entire school population. School librarians not only teach standards included in the new state library media information curriculum they are also the key technology specialist in every building in our District. They create readers, they support "makerspaces", they build citizenship and respect for our democratic institutions, they teach all students 21st century skills, they collaborate with teachers on research, and the list goes on and on. I have seen librarians engage students in "The Federalist Papers" – imagine that! I have seen librarians fill book vending machines that build excitement and a love of reading. I have seen librarians deliver engaging instruction on how to determine if the information a student has found on Google is, in fact, real. I have seen librarians organize Book Fairs so that they can purchase more materials for their students and teachers. There is simply no end to the important work of a school librarian and their impact on all students and staff. There is clear evidence from across the country that illustrates what happens if staffing ratios aren't an accreditation requirement. Suddenly the librarian is gone and someone comes in a few hours a week to "checkout" books. This is a travesty and a disservice to Montana's children. I urge this committee to maintain or increase the current staffing ratios. I also would request this committee make these proposed changes more widely known and consider extending the public comment period. Respectfully, Barbara Ridgway

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Please add my opinion. and plea to the mix when discussing recommendations to eliminate middle school requirements for elective programs. All studies prove that fine arts are so important to the growth and learning ability of the whole student. The data is everywhere. If this also affects technology and foreign language, please know that I believe strongly that these electives provide opportunities for students that go into creating the kind of future graduates that we have sworn to produce for the greater good of the individual student and the collective future of adults that we are responsible for nurturing. Politically, if these requirements are reduced or removed, next will come funding. If funding is reduced or removed, programs will have to be dismantled. Having lived through years where schools were not meeting NCLB mandates, one of the first requirements when outside experts came into help failing schools was to put an emphasis on fine arts as a leading component to help meet all benchmarks of a thriving school. Targeting these programs is clearly counter-productive to what makes a healthy student and what makes a healthy school. PLEASE speak out in support of these elective programs. It is well known that once something is removed, it is extremely difficult to reinstate. Our students and communities cannot afford to lose these opportunities. Thank you for your time. Todd Rosenberger Director of Bands

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I am writing today to express my shock, dismay, and great concern I have in response to OPI's proposed changes to the school requirements. I must question the motives behind these changes as they clearly do not address the needs of Montana students. It is in unity with my colleagues that I would like to highlight some of the most alarming problems in the proposal. This is no way a comprehensive list of issues but in the absence of adequate time to respond to every outrageous proposal I will highlight the following. Reduction of counseling services: Working at a Title school with many students who daily need counseling it is frightening to me to think we would not have a counselor available to them. Not to mention their future if they are left to deal with their mental health issues alone. Teachers are experiencing more behavioral issues than ever before, and these students need support from trained professionals. The only way to ensure students have successful futures is to provide early intervention and support, which you have decided to deny our students. The contract option is inconsistent and I'm curious as to where the funding for this option would come from. Mental Health of Students. According to the World Population Review, Montana is third in the country for suicides. As recently as March of 2022 Billings MT reported that in a recent survey "The survey, made up of 98 questions for students in grades 7-12 and released last fall, revealed that 41.4 percent of high school students reported feeling depressed almost every day for at least two straight weeks. That's an all-time high, especially for women who self-reported at 52.6 percent." Reduction of Library services: School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. We put a huge amount of responsibility on the librarians to be experts and educate in many areas, including internet safety and responsible research. School library programs foster critical thinking, providing students with the skills they need to analyze, form, and communicate ideas in compelling ways. Schools with librarians consistently have higher reading scores in all grade levels and have fewer Below Basic scores. These correlations cannot be explained away by teacher qualifications, pupil ratios, school funding, or student demographics. School libraries encourage a lifetime love of reading. School librarians collaborate with educators to deliver instruction on research strategies, online databases, the difference between a vetted resource and one created in someone's basement. Quotes from students in my school regarding library. "Library is the best because we read books and learn about different things. I learn about grammar and other things" "I'm a third grader and in my opinion Library ROCKS! I like getting to read" "Library is the best for kids because creativity in books is great for kids. Kids need to read if they want to have the ability to do important things in the future" "Library has taught me how to find materials I want to learn more about. I've also learned how to be a responsible digital citizen, to write original research reports and give credit to my sources to avoid plagiarism." Electives: By removing the requirement of an elective, you negatively impact a child's education. There are countless articles, studies, and doctorate thesis focused on the impact art and music have on a student's emotional and academic growth. More than ever our students need an outlet of expression while they navigate these challenging times. Beyond the emotional outlet music and art aid in all academic areas and are used in a co-curriculum to help aid

learning. By writing a proposal that elements these requirements it is an obvious that the writers do not understand the importance and have gone out of their way to remain uneducated on the benefits. I recently attended a graduation violin recital. The musician was phenomenal! As far as I know her family was not a musical family. Because of a 6th grade music requirement, she chose to learn violin. This former student is a very high achieving academic. Without this requirement, she may not have chosen to learn violin and what a loss that would be to our world! More quotes from students: "I love music, I love to sing. I love my music teacher" "We should keep music because people like the calming flow of sounds, like me!" "3 reasons to not get rid of PE. 1. It's good for you. 2. Some people like it. 3. Exercise" "I like music because it is calming to me and gives me contentment and joy. Music gives me joy and happiness." "I like art because it can help you become a good artist and help your writing" "I like art because it makes you have good ideas and it makes you creative" Our students deserve to have access to professionals to teach them these subjects. Simply "integrating the subjects" into a standard classroom puts the responsibility on the teacher to be an expert in fields that others dedicate their whole lives to not to mention that there is hardly time in the day for a classroom teacher to teach more subjects and to teach them all expertly. For this reason, we work in a system of collaboration for education. It looks like OPI is looking for an easy solution to a complicated problem and hoping no one will notice as they try to take the easy way out. As I stated in the beginning of this letter, this is just a few of my concerns. I feel confident you will be hearing more from the people of our state that address all the inadequacies of these proposals. It escapes me as to why OPI is seeking to tear down a system that strives to fully educate the whole child. The state of Montana deserves better. Yours sincerely, Tracie Shepherd Helena, Montana

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I urge you to maintain the student ratios in school library media services and school counseling staff in the current rule and not accept the proposed changes by Superintendent Arntzen. Counselors and librarians are crucial to our students' success. I have two children. One who graduated MSU last December with honors and one who will graduate from Polson High School as valedictorian this Spring. Their success would not be possible without the support from the librarians and counselors in their schools. Montana has one of the highest suicide rates in the nation. Changing the required ratio of counselors to students will mean additional deaths. Librarians are a crucial resource for all of our children as are libraries in schools. Thank you for your service and your consideration. Sincerely, Rosemary Hickey

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I apologize for getting these comments to you so late (given the meeting this afternoon), but I only now became aware of what is at stake, and cancelled my own plans for the morning to put some comments together for your review. I am writing to advocate for the necessity of maintaining essential, qualified supportive services for mental health in the Montana public schools. One has only to look at the unprecedented numbers of depression, suicide and violence among school age children to see the reality of a generation facing critical stresses. Added to these issues are the number of kids who now struggle with their own very real challenges in how their still developing brains shape their capacities to learn and to socialize with their fellow students. The school years are critical in shaping young people to become functional, responsible adults and citizens. I have a grandson, I spend regular time with, who struggles with very real behavioral issues that make it challenging for him to sit and learn in a classroom. [REDACTED]

[REDACTED] However, I would like to address the critical role that the public schools play in how he comes through these next few years. To my knowledge, there is only one school in Missoula right now that has the full range of supportive services that can accommodate children who need the chance to have time out of classroom with highly qualified support services. [REDACTED]

[REDACTED] Without a full range of skilled, qualified counseling and support services, I can see that he would become an outcast, bullied, and feel defeated. Kids like my grandson have precious gifts that need to be recognized and developed. They need a continuum of care and support to help them overcome the challenges that they did not choose, so that they can become contributing, functional members of our communities. Schools play an essential role as part of that continuum, and without the number of highly qualified school counselors required to provide the critical services to these kids, schools will fail

these kids, and the problems they struggle with will continue into adulthood. Tragically, we already see far too much evidence of this kind of systemic failure! Let me give you some specific examples of the problems that result when a school is not well enough staffed with qualified counselors: A child that is being disruptive to the class is sent out, but no one is available that can spend time with him (or he) in a meaningful way. The parents get called, and if both are working, someone has to leave work. If this happens frequently, a parent can lose his or her job. Meanwhile, the child gets no help! A child begins to see him/herself as being a problem, something wrong, not successful or liked.

One parent or the other had to transport him to and from school. Here's what the benefits were of this transfer: For some time, he struggled with the change. New kids, new teachers, new building and rules. The adjustment was challenging in itself, but now, when he was not able to participate without being disruptive, he was sent out to a place where there was a trained person available that worked with him until he was ready to go back into the classroom.

With time and experience, he was able to adjust, and by the end of the year, was able to be in the classroom most the time without incident. His parents were not getting called to come pick him up, but they were kept informed as to his ability to function and participate.

Both parents were able to work at their jobs without interruption, which contributed to their stability. My grandson felt happier, more content and like he belonged at the school. He was beginning to make friends. We are hoping to get him back in that school for the next school year. Mind you, to my knowledge, there is only one school in the Missoula district that has the full range of support services available. If the ratio of student to counselor is decreased, so that the ability of the counselor to be involved and engaged with these kids is totally unrealistic, we are looking at a systemic failure, and increasing numbers of kids who fail at various ways - by depression, aggression, drugs, suicide, etc. Our families and communities cannot afford this kind of failure. I know Superintendent Arntzen is inclined to reduce the cost of public schools, including the mental health support services. Doing so would produce tragic and unacceptable outcomes. There is no more vital investment in the social fabric of our communities and nation than in the education and well being of our children. Thank you for your consideration. Sincerely, Marti de Alva

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I am writing to urge you to vote against Sup. Arntzen's cynical proposal to slash programs for our children. Montana kids of all socioeconomic and cultural backgrounds are depending on you protect their access to a well rounded public education. Specifically: The loss of endorsed literacy experts in each school (librarians) would result in lower reading and writing scores which is counterproductive to stated goals. Changing requirements such as music and art for elementary and middle school students runs counter to the 2015 Every Student Succeeds Act (ESSA) which requires a 'well-rounded' education, specifically including arts and music. Every elementary and middle school student should have access to these subjects in school. Yes, we have a severe teacher shortage in Montana--especially rural Montana. But cutting requirements for accreditation is another way of saying what specialist teachers offer doesn't matter to a student's education. Once FTE (teacher positions) is eradicated from school accreditation requirements the FTE will never come back again. Why would we gut student's access to counseling? Especially now when student well-being is such a wide-spread and pressing need? Teachers are not trained counselors. College and career readiness is not just a 'nice' thing that schools offer through reading, writing math and science (the four things that would remain required for accreditation if the changes go through). College and career readiness involves all the variety of learning that leads to a successful life. Elective courses keep students in schools thus improving graduation rates. We need to find solutions to the teacher shortage that don't sacrifice a student's learning opportunities. Thank you for your consideration. Please do right by Montana's children. Rose Liebman

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How is anyone actually on board with these recent proposed changes, and enough to bring it this far! Why would anyone consider cutting back counselors?? Our kids need counsel now more than ever. These people are essential in helping kids navigate emotions and ongoing issues they face these days. I am an arts educator in private organizations, but I have young children of my own that will soon be enrolled in the public system. Obviously, I'm biased when it comes to the arts being cut as well. To even consider this cut Means ignoring a

great deal of evidence that supports a whole child. And libraries? Denying access to knowledge? I am not denying the system needs changes, but we cannot have a system that attempts to produce robots. It will not advance our communities in any way, shape or form. Please, please vote these changes down. Julia Harris Helena

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Please vote to oppose the proposed changes to the ratio of school librarians and school counselors per student in Montana. These changes would be potentially detrimental to Montana's youngest. Keep ratios as-is. Librarians play an integral part in making schools safer, more equitable and research has shown a positive correlation between high-quality library programs and student achievement. Libraries are often learning hubs for students and provide a place for critical thinking, access to technology, and help foster a love of reading. Librarians are essential in creating a successful school. School Counselors provide critical mental health support to students who might not have access otherwise, not to mention all the other resources provided to all students from college and career to academic information. They ensure equitable academic, career and social emotional development for all students. Cuts to both of these school positions would affect all Montana schools negatively but would be especially detrimental to our rural and Native American school. Vote no and do your part to ensure these positions are valued in Montana's schools. Thank you, Brenda Carney Helena, Montana

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I am writing to express my opposition to the recommended changes to ARMs 10.55.709, 10.55.710, 10.55.901, 10.55.902, 10.55.904, and 10.55.905 that will be discussed on May 18th by OPI's Chapter 55 Negotiated Rule Making Committee. I am a mom of two public school students in Helena, MT-a 6th grader at Helena Middle School and a freshman at Helena High.

[REDACTED]

[REDACTED] Instead of going to PE along with other physical activities she is able to go to the library, practice her violin, sing and create artwork. [REDACTED] and know first hand how vital having full time counselors at each school is for the safety and protection of all of our students.

[REDACTED]

[REDACTED]. Especially during Covid and puberty, kids need to be able to speak with educated counselors for their own mental health. I have seen and felt the true importance of what being a part of a team/club does for everyone's mental health and well being. My son loves being in the pep band, having clubs he can join along with being in cross country and track. He has also learned so much in Spanish and has made incredible friendships. I am an oil artist and know how important it is for our children to have a variety of different activities and outlets that help them thrive and feel valued. Library, music and art are extremely important to our youth as they give our children avenues to meet other peers and build on their own talents and skills throughout their lifetime. Young people in Montana are in a mental health crisis. According to OPI's own Youth Risk Behavior Survey data, one in 5 high school students seriously considered attempting suicide in 2021 and one in 10 actually made a suicide attempt. The youth suicide rate in Montana is double the rate seen in the US as a whole. (Source: Montana Vital Statistics). And the problem has accelerated in recent years. 41% of Montana high school students reported symptoms consistent with depression in 2021, up 59% from 1999 and 33% in the last 4 years alone. To eliminate the required ratios for school counselors in Montana schools, as this rule change proposes to do, at the same time when Montana's Comprehensive School and Community Treatment (CSCT) program that serves the most vulnerable kids in Montana is sunsetting, will undoubtedly reduce access to mental health services and supports for students in our state. I cannot state more emphatically how this rule change will impact the most vulnerable students attending the schools in our state with the least resources. Youth with suicidal ideation, Severe Emotional Disturbance and other complex behavioral health needs will suffer when schools are no longer to have counselors on site or maintain what are already paltry levels of service and staffing. Please reconsider. In addition, the rules eliminating requirements for employee librarians and gutting elective requirements for middle school students will lower the quality and breadth of education in our state-particularly in low income and tribal areas. Please maintain the current language and standards for the good of all students. Thank you, Holly Morgan-Fitterer

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My name is Krisin Kailey. I am a teacher in Billings School District 2 . I am concerned about the proposed language changes to Montana State Accreditation standards. Increasing the staff to student ratio for counseling and library may alleviate some staffing issues, however this will make it more difficult for students to access these education professionals. Further, if the language for required middle school electives is less specific (i.e. no requirement for performing arts/music, foreign language, etc.), students will have less opportunity/access to these rich, creative classes. This also may affect the students credits needed for meeting graduation requirements. Please consider opposing the proposed language changes to the Montana State Accreditation standards. Thank you, Kristin Kailey

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I work at Elementary school in Billings. The idea of not having a school counselor is appalling and quite scary. There are so many students who visit our counselor on any given day, for so many different reasons. The idea of these children or any other child not having this resource is beyond comprehension. Please KEEP OUR COUNSELORS!! Sincerely Julie Galloway

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Supt. Arntzen's decision to unilaterally go against the recommendations of the committee in terms of the required 1 school counselor per every 400 students is simply tragic. It is a devastating blow to the already problematic mental health issues in a state that recently legalized marijuana, and somehow made it easier to get a gun. What could go wrong with increased access to drugs and firearms, paired with less access to mental health therapy for nearly all kids 3-18? You know the answer to that... do the right thing. Supt. Arntzen is framing this change as "more mental health in schools" - yet, they will be hiring less qualified individuals, while at the same time undermining the accreditation and the work that it takes to be a School Counselor. Employees in these positions need to be highly qualified and you need to pay them... cut the budget somewhere else. Cutting costs by hiring less qualified counselors will only hurt the kiddos and their families - do the right thing.

It's not too late to right the ship...Will Stack

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As you all prepare to meet this afternoon, please take into consideration what is happening with these new proposals by State Superintendent Elise Arntzen. Her senseless and dangerous ideas will impact middle school programs, and will eliminate safe staffing ratios for professional mental health counselors, librarians in schools, and apparently, looks as if it will destroy anything to do with the arts, which students should have in ALL school programs.

It appears that these changes, which may be needed as an option in specific rural schools, are being applied to all schools, regardless of the students' needs. Often, school-based programs are the only ones that some students can access or afford. Removing them can cause great harm.

These changes will weaken educational standards and the quality of education for all students, which is unacceptable. Our schools are already under attacked by close-minded, backward-thinking individuals who seem not to care about the students or their educations. But only about hindering any and all opportunities to open the minds of students, and to help them create thinking skills. Best, Martin Casella Playwright, Screenwriter, Writer

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#### Staff Ratios

I am an elementary school counselor and counselor educator. I am also a licensed clinical professional counselor. As someone who works in the mental health field in several different capacities, I can't stress enough how detrimental the proposed changes would be for our kids and our society. Kids and families, especially our most vulnerable populations, need access to more mental health support, not less. Please don't leave these kids, families, and schools without the mental health support they need. Thank you for your consideration. Arianna Vokos. Elementary (K-4) School Counselor.

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Good morning. The changes proposed by OPI for both middle school curriculum, library, and counseling will hurt our students' ability to be successful in life. Middle school student deserves to have a full curriculum offered to them including ALL core subjects and a variety of electives. Students need exposure to all subject areas starting in kindergarten and the thought of schools not teaching subjects is a disservice to educating students in Montana. We cannot expect our students to be successful if they are not prepared at all levels in middle school. Schools should be held accountable to teach ALL academic areas and provide electives in all areas of visual and performing arts, CTE, and foreign language. We need to prepare our students for the future and for high school. The changes to the library/counseling student to teacher ratio only further hurts our students. I understand that small schools are at a disadvantage when hiring these positions but that doesn't mean programs should be cut. Provide exemptions for small schools to staff the library with an aide if they cannot have a full-time teacher present or if a small school needs to share a counselor. Large schools are already staffing at the minimum and our students are suffering even under the current standards and funding. We are having to utilize extra services at the COST to parents and insurance companies to serve the mental health of our students already. Students deserve access to a library at all times in their schools. Billings public schools has 22 elementary schools and 6 middle schools. The current proposal would allow Billings to have 1 librarian for all of these schools. 1 librarian at a middle school is not enough to serve 650 students. We need 1.5 to serve them appropriately. In terms of counseling, we should only be adding counselors to schools, not cutting them. A 400:1 ratio doesn't even serve the students we have now. How do we expect to serve students mental health if we do not have counselors? What is the purpose of all these changes? There is no justifiable reason to cut the programs listed above. What do we want our students to actually learn then? Why have standards if Elise just wants cut all the programs listed above and/or not require students to take BASIC education courses + a variety of electives in middle school? How do we actually expect our students to be successful in high school and later on if they are not REQUIRED to take English, math, science, and social studies each year in middle school? These questions need to be answered and not 1 educator would ever support eliminating access to education for our students. Montana needs to be better than this and should do better on behalf of our students. Thank you, Anjuli Ross.

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I would like to express my concern with the proposed recommendations made by Supt. Arntzen regarding electives in middle schools across Montana. I am also opposed to the proposals to reduce/eliminate librarian and counselor ratios, especially at a time when our children need them the most. We must never get to the point where we are watering down the education offered to our students. These proposals especially affect small schools like ours, where students have limited opportunities already. Please do not change the language from its current state. Thank you for your time. Laura Dukart.

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I am a middle school teacher in Eureka, MT. I feel like it would be extremely detrimental to my students to remove the counselor and librarian ratios that are currently in place. Currently I feel like we need more mental health support for our students instead of less. Sincerely, Angela Price.

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I am writing to express my grave concern about many of Supt. Arntzen recommended changes to the Montana school accreditation standards. I am a retired Montana teacher of over 30 years at both the Middle and High School level. During that time, I was a very active educator that engaged myself in the impact of our educational system as a whole, continuously focusing on how to best meet our students' needs at all levels. I am a strong believer in that it takes a village, so eliminating/reducing access to librarians and counselors at any level is ludicrous. If anything, we should be reducing our student ratio to these services and working hard to find ways to provide more counselors and librarians to help support the needs of as many students as possible. Obviously, Supt. Arntzen must not spend much time in the trenches of a functioning school to observe how important these individuals are to those schools, and more importantly the students that attend these schools. Walk in the shoes of a counselor that has to serve close to 400 students for a day or two, perhaps that might change her perspective. I am also deeply concerned about Supt. Arntzen's proposal to strike the long list of elective requirements that are currently in place within the accreditation

standards. During my 30+ years as a teacher I was a CTE teacher both at the High School, and the Middle School level. That being the case I could go on and on about the importance of these types of courses as well as the importance of providing diverse subject areas for our youth. Eliminating these requirements just opens the door to a continued degradation of the educational opportunities we are providing for our students. I can't believe that any citizen of Montana wants that for our youth. I am struggling to understand why any of these changes are being proposed, other than to continue to degrade our fine public schools and make it easier to operate private schools that might not be able to provide the wide range of diversity that our students of today need. Please do not support these proposed changes that slash educational opportunity, and instead let's work towards how we can increase educational opportunity and support for our Montana students. Sincerely, Jamie Isaly. Retired Teacher & Education Advocate.

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I am writing this letter in opposition to Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio. The licensed School Counselor to Student ratio should remain in the accreditation standards to ensure that every Montana's student receive the academic, mental, behavioral health, and career development support they so desperately need. In the last two years we have seen a significant increase in our students' behavioral health challenges in Montana, including an increase in suicidality, depression, and anxiety as well as the resulting school truancy, increased substance use and poor academic achievement that occurs from these difficulties. These alarming statistics are verified in the 2021 Montana Youth Behavioral Risk Survey that was generated by the Montana Office of Public Instruction (report attached to this email). The following quote is taken directly from the American School Counseling Associations' professional position statement: "All schools and communities have students who could potentially drop out of school and/or engage in destructive behaviors such as absenteeism, performing below their potential academically, substance abuse, bullying, cyberbullying, suicidal ideation, physical violence or engaging in self-harm and other destructive or dangerous behaviors. Additionally, schools and communities have environmental, resource or policy issues inadvertently contributing to student failure and harmful behaviors (Holcomb-McCoy, 2007). These behaviors can have devastating lifelong implications and often stem from social/ emotional concerns including: low self-esteem, family and relationship problems, grief, trauma, neglect, abuse and/or substance use. Implementing trauma-informed practices helps staff with interventions while maintaining sensitivity to students (Haviland, 2017). The prevailing research has and continues to maintain that an in-school licensed School Counselor who mentors students and implements programs prevents against these dangerous risk factors and is a protective factor in students' lives! (Black, Grenard, Sussman, Rohrback, 2010). Currently the national recommendation for School Counselor to student ratio is 250:1. Montana recommends 400:1. This accreditation standard guarantees every Montana student has access to a School Couneslor and a developmentally appropriate school counseling program which is teaching adaptive coping skills and builds resiliency. This is a protective factor and an educational right of Montana children. The American Counselor Association, American Psychological Association, National Association of School Psychologists, and the American School Counselor Association all advocate for increased mental health services in our schools. Montana would be going backwards if the ratio is eliminated. The school-based CSCT programs have already been cut by the state-- this decision has the potential to eliminate any behavioral health support in the schools which would burden an already taxed educational system. As 20-year Montana educator, I vehemently oppose Superintendent Artnzen's recommendation to eliminate the School Counselor to student ratio in Montana schools. Her recommendation is not in the best interest of Montana students. Sincerely, Dr. Katey T. Franklin, PhD, Licensed School Counselor.

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I strongly oppose Superintendent Arntzen's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. If passed, these changes will negatively impact students in our state. School librarians improve literacy rates by instilling a lifelong love of reading, making personalized book recommendation and encouraging reluctant readers. In addition, they teach students to be digitally literate, helping students use technology safely, ethically and responsibly. They facilitate multidisciplinary connections between departments and assist with research, ensuring that students are prepared for college and other career paths. Librarians ensure students are equipped with 21st century skills and are future ready. To do

away with the ratio will be detrimental to students and schools in the state of Montana. For these reasons, I strongly oppose these proposed changes. Sincerely, Noelle Harper.

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Please maintain librarian and counselor ratios. I DO NOT SUPPORT THE CHANGES. Danielle Shyne.

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I am writing to express my disappointment in the thought of eliminating the ratio of school counselors in our schools. Mental health is real and it's in ALL grade levels. Access to counselors is CRUCIAL and should not be lessened, rather it should be increased. I am a parent of two teenage daughters who have both BENEFITED from their school counselors who have helped them realize they are worth living for. Please reconsider this change immediately and do NOT eliminate the ratio of school counselors. Kristin Grant. Billings, MT.

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I am opposed to the proposed changes. Librarians provide a critical role in children's education. They serve as a resource for many areas from recommendations to research. Eliminating the ratios of librarian to students will make them less effective and reduce their success in assisting students' education. Eliminating the ratio for counselors at a time when depression across the board is at an all time high is reckless. Montana has an extremely high suicide rate. 400 to 1 is a high number for counselors to manage is already inadequate. Eliminating that ratio will take their assistance away from those who need it most. There continues to be more issues facing families and having access to counselors in the schools is needed now more than ever. Eliminating the requirements for music and arts is a huge mistake. These classes are critical for a child's learning. Some children have only this to expand their knowledge and interest. It's racial that these continue to be required. Terrie Casey. The reduction of in district mental health services is EXTREMELY detrimental!! Every single student I work with on a daily basis NEEDS these services. They will not be provided outside of school by parents/guardians. The mental health of our students is the last thing we should be pushing to the side!! All this will do is push our students into adulthood with long term mental health issues that SHOULD be addressed at the elementary level. This is an ABSOLUTLY OUTRAGIOUS proposal!!! Anyone that votes for this obscene proposal truly has no compassion for the next generation. Shelby Tefft. I am writing to urge you to reject Elsie Arntzen's recommendation to do away with required staffing ratios for school librarians and counselors. Making the change for small rural schools would perhaps be beneficial, but making a sweeping, statewide change is irresponsible. It lessens the quality of education the students of Montana receive. Thank you for your consideration. Lisa Brennan. Missoula, Montana

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I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians help maintain excellence in education for every student. Maintaining the ratio - which has been in place and working for over 30 years - is the wisest decision for our students. While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state. Yours sincerely, Stacey Hubbel.

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