



Chapter 55

**These are written
Public Comments on the
6 rule revisions coming from
Library Media Specialists
Received May 17th, 18th, 19th**



Written Public Comment
Library Media Specialists
Received May 17th and 18th

I am writing to comment on the proposed changes in the OPI adjustments to school accreditation requirements. In particular, the proposal that would affect the teacher-librarian positions we so desperately need in our schools. At a time when 'reading, writing and arithmetic' is so heavily emphasised, why would OPI consider making changes that could lead to the loss of literacy experts in each school? Why change a position that supports teachers as they teach literacy to students? This is counter-intuitive to our goals of increasing the number of students who are proficient in English language communication.

I realize the severity of our teacher shortage in Montana. It existed in our small schools pre-pandemic, and it's likely to affect the larger districts as well because of skyrocketing living expenses. We need other solutions that don't impact the students and teachers so severely. I suggest finding ways to increase teacher pay so as to keep, and attract, quality teachers in Montana.

Thank you,
Chandra Lind
Orchestra Director
Chief Joseph Middle School
Bozeman Public Schools

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students. As a retired school librarian I know the importance of being there for students and classroom teachers. I taught important information skills and selected the best resources for both teachers and students. These are not skills that many teachers have time for in their daily work. Librarians teach students how to research topics and to discern authentic information from false information on the internet. This is a 21st century skill that cannot be emphasized enough. Librarians read reviews of books and teachers materials and select the best possible resources for both students and teachers. All schools, no matter how small, need this key person to promote success in their schools. The ratio of librarians to students has worked well for Montana. Please do not change it.

Yours sincerely,
Dayl Fredrickson

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. Do not do further disservice to the students of Montana or their librarians by instituting such a terrible decision.

Yours sincerely,

As a middle school teacher-librarian here in Montana, I read Ms. Arntzen's recent proposed changes to public school accreditation with disbelief and concern. Her plan to effectively eliminate school libraries, librarians, and counselors is short-sided, bad for kids, and irresponsible.

I wonder if Ms. Arntzen has spent much time in a middle school library, lately. I'm guessing not. Or how about a school counseling center? If she had, she would see that while these have always been two very important hubs of a school community, in today's world they are more important than ever.

As teacher-librarians, we provide opportunities and guide students in learning how to find, evaluate, use, and share information in a responsible and ethical manner. We teach students how to recognize credible information and help them learn how to identify misinformation. We curate age-appropriate resources for research as well as for reading for pleasure to create lifelong learners who are functioning, contributing members of the community and society. We teach students how to search for books that interest them, that speak to them. Books that allow them to read about people who may share their struggles, so they don't feel so alone or different, or to read about characters who have struggles different than their own, thus developing empathy for others.

We provide a safe, inclusive place for students who feel they need to catch their breath or take a break. Many students come to school struggling with anxiety, social issues, a difficult homelife, chaos, trauma, etc. The library is often a place where they feel safe, welcome, and comfortable, sometimes the only place.

The counseling center is also a vital part of our school community. Now, more than ever, our students are struggling socially and emotionally. Sadly, death by suicide is not a stranger to our school community. Before Covid 19, students struggled. Today, more students are struggling. We need more counselors for these young people, not less, or basically...none.

Please consider the impact these sweeping changes would have on each student in our state. The removal of school libraries, librarians, and counselors in Montana's public schools would have detrimental effects on our student's and our community's future.

Thank you for your time.

Jill Hanson
Teacher-Librarian
CR Anderson Middle School

I am writing in concern about proposed 10.55.709 that will greatly impact the number of librarians required by a school and district. I am currently split between two schools right now and both my schools feel the impact of not having FTE library services. Not having adequate time in both buildings has detrimental effects on student relationships, staff collaboration and adequate collection development.

Student relationships and outreach are cut when I am not there full time because I do not have any time to plan or host events that provide learning opportunities or curriculum extensions. These provide opportunities to students that they may not be able to get in the classroom. Furthermore there is no time to plan collaboration projects with staff, like working on research projects together or co-teaching inquiry. Lastly, the library collection itself suffers as there is not time to fully maintain materials. This means checking relevance of materials, age of information and general wear and tear of books. If we want to build 21st century learners we need to make sure the library and the materials within help support students and staff.

I strongly urge the committee to not pass this 10.55.709. It will hurt students across Montana and limit their access to libraries.

Thank you,
Kourtnei McHugh

I am writing in response to Superintendent Artzen's proposed changes to electives and required courses for the students in Montana. Our Superintendent is failing our students with these proposed changes.

I truly cannot understand why removing requirements for reading and writing literacy, math, social studies, and science, let alone electives in the arts, world languages, and cultures (see strikes below) would make students in our state ready for the world in which they live. This is backwards. Our superintendent should be supporting the education offered in our state. This appears to annihilate education.

Furthermore, these proposals slash library and counseling programs. I have taught for 37 years, and I have never seen a time when counselors did more work than right now. Montana already has the highest suicide rate in the country, and our Superintendent wants to take away mental health services. This is appalling. Librarians are a huge source of information, but they also get to teach each student in the school over many years, helping them to grow as readers, how to find information, how to weigh truth from fiction, and how to be safe on the internet. They are an integral part of any school.

I fear for my students, and I especially fear for my own children. These proposed changes reduce our Montana education. Superintendent Artzen has a responsibility to Public Education because that is her elected position - to protect it, to preserve it, to change it for the better. These changes undermine public education, for the purpose of what? Ultimately if it is designed for students and education as a whole to fail, it is dangerous to even consider these changes.

I cannot condone public employees attempting to wield their power to reduce, remove, weaken, diminish, undermine, or devitalize the education of our children for personal gain, be it political or monetary. I can think of no other reason why Superintendent Artzen would propose changes that destroy education.

Vote down the destruction of our education system.

Thank you.
Laura Curtis
Helena, MT

~~(4) A junior high (grades 7-9) or 7-8 school must offer an educational program, aligned to the program area standards, that enables all students to meet the content standards and content-specific grade-level progressions.~~

~~(a) Instruction in reading literacy and writing literacy shall be incorporated into all required and elective program areas as required in the Montana Common Core Standards, ARM Title 10, chapter 53.~~

~~(b) All students shall complete the following program areas each year:~~

~~(i) English language arts--1 unit;~~

~~(ii) social studies--1 unit;~~

~~iii) mathematics--1 unit;~~

~~(iv) science--1 unit; and~~

~~(v) health enhancement--1/2 unit.~~

~~(c) All students must be allowed to elect from the following program area offerings:~~

~~(i) visual arts--1/2 unit;~~

~~(ii) music--1/2 unit;~~

~~(iii) career and technical education--1/2 unit; and~~

~~(iv) world languages and cultures--1/2 unit.~~

~~(d) A unit is defined as the equivalent of at least 8100 minutes for one school year.~~

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.

As a former librarian and a teacher for 14 years but also as a parent, I oppose what Superintendent Arntzen is trying to do. This is truly appalling.

Lissa Olinger

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Yours sincerely,
Mary Stranahan

Obviously Superintendent Arntzen has no clue of what it takes to educate children of all ages in this day and age. Limiting access to, or eliminating access to the school librarian is absurd. Librarians are a critical component in educating our youth. The only person who should be eliminated is Superintendent Arntzen.
Mrs. Meghan Rodin
Paxson Elementary Kindergarten

I am writing this email in regard to the proposed changes to ratios for librarians and school counselors. These proposed changes have a huge effect on students, families, and staff. Equitable access to education and services will impact students in greatest need.

School libraries are the heart of the school. They are homes to meetings, events, classes, clubs, lunch and learns, and safe spaces for students to seek out. A school librarian is responsible for curating a collection that is appropriate for the curriculum and patrons as well as maintaining materials. Librarians also teach (we have teaching licenses) and prep for as many as 30 (elementary level) classes each week. A school librarian also supports classroom teachers by providing clubs and collaboration opportunities. When ratios are eliminated librarians are moved from one central location and basically required to do full-time jobs in multiple locations. Collections will fall out of date, and students and staff will have limited access to materials and support. Enriching and supportive experiences will be limited due to time constraints.

Please review the [infographic \[ala.org\]](http://infographic.ala.org) from the American Library Association to better see and understand the importance of school libraries and equitable access.

Montana is a rare and beautiful place. By limiting and dismissing access to librarians and counselors you are removing core support pieces to a healthy school environment. Montana is better than that and should be setting the standard for others to measure themselves by.

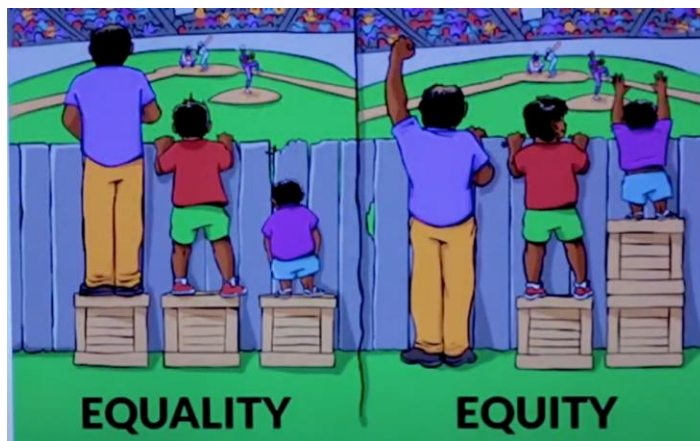
Thank you for your time

Good afternoon,

I would like to voice my opposition to Arntzen's recommendations to centralize library media services, and eliminate the counselor to student ratio for K-8. I honestly do not even understand why this being a bad idea isn't apparent.

The suggestions redistribute resources in a way that directly affects low income and rural students.

- Access to a counselor
 - As a state that remains in the top three with the highest annual suicide rate, reducing counselors for our children seems negligent. If anything, greater investment in the future of Montana should relate to improving the mental health of the children. To reduce access to groups who have fewer options to access counselors feels like taking food off the table of a group who is starving it and giving it to a table where most bellies are full.
- Centralizing library media service
 - I can't think of a time where access to local libraries and media services are more critical. During the pandemic children without internet services suffered. Poor internet access affects Native American and rural communities. When I consider equity, I can't help but reflect on the iconic image below (also found at [equity – NSCBC \[nscbc.org\]](https://nscbc.org/equity) in case the image is filtered out through the email.) Rather than progressing towards distributing resources equitably to ensure everyone has equal access to services, we are going in the opposite direction. How does that make any sense?



Sincerely,

Rozlyn Haley (*she, hers*)

[What Are Personal Pronouns and Why Do They Matter? \[mypronouns.org\]](https://mypronouns.org/What-Are-Personal-Pronouns-and-Why-Do-They-Matter/)

Missoula County JEDI Fellow | MPA Candidate

(*JEDI: Justice, Equity, Diversity, and Inclusion*)

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Yours sincerely,

Shannon Chamberlain

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Stacey Keffeler

6th Grade

Washington Middle School

I was so surprised to learn that Superintendent Arntzen is considering changing the staffing requirements for "teacher - librarians:" (the more accurate term), and counselors in our public schools.

Please do not let this happen. Our school libraries and librarians are the hub of student and faculty learning. This is the center of inquiring minds who wish to seek knowledge beyond their classroom. Our teacher-librarians are uniquely qualified to guide students through the inquiry process of learning. Take a look at the training program. Take a look at the curriculum developed and recently approved by the Helena School District. Do not make faulty assumptions that those ratios are purposeless. Teacher-librarians deliver a necessary boost to our students. Those same teacher-librarians also lead the way for staff to learn new skills with online databases and educational learning programs. The one thing we can do with less is less.

The school counselors are also extremely underappreciated and undervalued. In a time when students are more stressed, reducing the counselor ratio is the absolutely wrong action to take as a superintendent. The counselors provide a necessary support system for students and parents throughout their school career. Decreasing the counselor student ratio will result in schools reacting to a seriously bad situation instead of preventing such a situation with professional staff members who are qualified counselors.

Do not gut our school systems of necessary professionals who make students successful.

Sincerely,

Tim Belliveau

Helena High School, Teacher

Thank you for the work you do on behalf of public education. Please emphasize to the Negotiating Rule Making Committee that our students need more school counseling support and continued library support with access to resources. Please address rural schools who have a difficult time meeting accreditation standards

individually and not wipe out needed staff-to-student ratios statewide. Thank you for working to do what's best for the whole child.

Sincerely,

Julie Barcus

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Yours sincerely,

Madison Davis

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Kammy Meyers

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Barbara Bolte

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Yours sincerely,

Angie Morris

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Yours sincerely,

Jill Keegan

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Yours sincerely,

Kate Peterson

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Charity Shirley

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Joanne Didriksen

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Yours sincerely,

Monica Anderson

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Nicole Hensley

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Beth Driggers

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Yours sincerely,

Vickie Anderson

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Mike Adolph

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Chrissy Rossow

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Yours sincerely,

Rachelle Terry

I am a teacher in Montana, and am appalled that our state would consider measures that would decrease the services our students receive. Librarians are needed. School counselors literally save lives. I am horrified to work in an education system that would support decreasing life saving and enhancing services like libraries, music, and in building counselors.

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Erin Asay

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Dalton Wiggins

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Yours sincerely,

Kara Marceau

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Yours sincerely,

Kelly Connolly

I am looking at a vary long list of classes that Ms. Arntsen wants to eliminate and I think it would be tragic to lose those. Art, many music classes, if not all, visual arts, careers and tech, languages, some science, health, some English and literacy... Please don't allow this to happen. Librarians (meaning libraries) would be gone too! Counselors and art teachers would be on the chopping block too.

Kids deserve to know if they have an interest in music, arts, technology and all the other things Ms. Arntsen wants to eliminate. I am begging you not to let this happen.

Sincerely,

Jack and Janet Wallace

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Yours sincerely,
Isabelle Schomberg-Sanchez

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Jessica Amende

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Eric Barker

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Yours sincerely,
Kimberly

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Katie Whisenand

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CarolRae Cambianica

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Yours sincerely,
Teresa Czech

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Rory Anderson

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Lily Chumrau

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Yours sincerely,
Kelly Hayden

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Madeleine Roberg

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Yours sincerely,
James Nordtome

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Retta Leaphart

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Becky Albertson

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Maggie Guttormson

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Sarah Milligan

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Shannon Ortt

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Leah Kreitinger

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Robin Pleninger

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Debra Tew

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BRUCE Coburn

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Yours sincerely,
Brandon Tirrell

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Gail Waldby Waldby

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Sandy Tirrell

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Elora Lissandrello

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Emily Ferguson-Steger

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Michelle Mori

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melissa belote

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Erin Ricard

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Carlie Mangold

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Lucinda Willis

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Marla Nelson

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Kristin Cordingley

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Trevor Swanson

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Cori Gray

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Jill Cook

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Yours sincerely,
ANESKA ELAM

I am writing today as the mom of three current Montana public school students. I am writing as a 19-year Montana public educator (in 7th grade biology). And I'm writing as a proud graduate myself of Montana public schools. I have fully read the proposed changes to the Montana Standards of Accreditation and I most strongly object. The proposed changes will unequivocally harm students. Specifically, - Middle school music and art requirements should not be removed. - Librarian ratios should not be removed. - Library requirements should not be removed. - Counselor ratios should not be removed. Our public schools in Montana are one of our greatest resources. These changes would do nothing but harm our students. Please vote against them!

Sincerely,
Megan Lane Helena, MT

I have been an educator for over 30 years and a librarian for many of those years. I wanted to write regarding my concerns at the degradation of programs in Montana schools. If we undermine skills, eliminate the need for qualified instructors, and lower our expectations and quality of education, how can we say we value education? In a time period when students need to disseminate fact from fiction, shouldn't we be valuing the library which teaches critical thinking and digital citizenship? In a time period when the mental health of children should be paramount, shouldn't we be promoting counseling, music, and visual arts? In a time period when communities are begging for quality employees, shouldn't we be encouraging career education? I understand that rural schools may find it difficult to fill these positions. That's why variances exist. However, don't lower the standards of education. Think carefully when making decisions that have long term effects on the health, safety, well-being, and future of the youth of Montana.

Sincerely,
Pamela Peters

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians, counselors, and electives to students in Montana schools. School librarians, counselors, and electives classes 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. Please do not let this

proposed change to Chapter 55 happen. Our students' mental well being, creativity, and love of reading will all be heavily impacted if this proposal is approved.

Very Best,

Stephanie Kay Fisher Project Lead The Way Teacher Washington Middle School

As the parent of two public school students, I urge you to please reject Superintendent Arntzen's proposed rule changes that threatens to limit student access to librarians and counselors by eliminating the required ratios of librarians and counselors. Please also reject the proposed rules that would repeal requirements for Middle schools to provide a broad range of electives.

Thank you,

Ben Brouwer Helena

I've been a teacher for 28 years and a teacher-librarian for 17 of those years. I've experienced the evolution of libraries. We offer a full-service library where I am a school leader in collaborative teaching, literacy promotion, program development, and making technology work in our building. In 2019 Missoula taxpayers built a brand new functional and beautiful library in the center of our school. We are open from 8:00 to 4:30 every day to serve our 1300 students and 100 staff members. Students are in the library before and after school, lunch and every period of the day. And we serve every student whether they are AP, special education, rich or poor. We level the playing field by providing access to technology and books for everyone at all ability levels. You are getting a huge bang for your buck when you hire school librarians!

Julie Burckhard, Librarian Hellgate High School

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Yours sincerely,

Kathleen Herman

As a mother, teacher, and taxpayer, I would like to comment on some of the proposed changes to school accreditation standards for Montana. School Library Media Services are essential for all Montana students. Librarians help fill an important role in the developing literacies of students by providing access to books and teaching the skills and safety needed in an increasingly technological society. Books are lifelines for many of our students. Eliminating the ratio will put rural students at an unfair advantage in these areas. The turmoil of the last school years makes school counselors more essential than ever. Students have had less opportunity for in-class guidance for future endeavors and many are suffering at an increased rate of mental health struggles. Reducing the ratio puts Montana kids at risk for increased mental health problems, increased academic struggles, and increased workload on overloaded teachers, particularly in rural areas. As a mom and a teacher, I see how very important access to electives are for students. It provides a "working" break from the standard fare of Reading, Writing, and Math. It allows kids to explore the world and think critically and creatively. The phrase "elective offerings" is too vague to ensure that students have equal access to a rich variety of classes.

Thank you for your time and consideration,
Katie Walters

I am deeply concerned to find out this morning that Superintendent Arntzen is recommending that the state library accreditation standards be lowered to the extent that one librarian could then serve the entire district if so chosen. The librarian role is one of the most misunderstood yet integral roles in the school. Checking books in and out is such a small part of our jobs. We curate collections, teach research skills, and turn many students on to reading who are getting missed in the classroom. We are the force that finds "just right books" for students and teachers, not only from our own collection but making purchases that are specific to our school populations. Please do not change the accreditation standards for school librarians that are currently working well.

Kaye Grissom Teacher-Librarian Hyalite Elementary School Bozeman, MT

I am a high school English teacher writing to you from Bozeman, MT regarding the proposal threatening school library media services. As an educator dedicated to promoting literacy and lifelong learning, I cannot stress how dangerous the decision to decrease staffing in librarians will be to our future as a state. Libraries provide irreplaceable support in developing literacy, along with a safe and supportive environment for students to address their social-emotional needs. Libraries provide students access to popular Young Adult lit books that they would otherwise not be able to access. The required texts in high-school English classes do not cater to the pleasure-reading needs of teenagers. Additionally, librarians dedicate much of their job to staying informed and keeping their shelves stocked with high-quality literature that will peak and hold the interest of students. If we rely solely on English teachers and their approved curriculum to foster a love of reading, we will be facing a major equity issue. School libraries provide the opportunity for ALL children to access high-interest books while they are at school, especially those who do not have the means to get to the library on their own or purchase their own books over the internet. Research indicates that students need to be reading outside of the classroom to achieve proficiency by the end of high school. If we truly care about having a literature population, staffing our libraries with certified librarians is non-negotiable. Furthermore, high-quality young adult literature provides a means of social-emotional education that is desperately needed in our schools. A 2021 survey or YRBS data conducted at Bozeman High School reported that in the 12 months leading up to the survey, 22.14% of our students seriously considered attempting suicide. This is less than a percent higher than the Montana High School average. Libraries staffed by trained professionals who dedicate their time to putting quality books into kids' hands offer not only the opportunity to improve their reading skills; they are giving these kids a much-needed escape from reality and a way to understand that they are not alone. On a practical level, these books are also providing kids with a safe means of experimentation that is often dangerous when carried out in real life. Instead of drinking, doing drugs, or engaging in other risky behaviors, kids have the opportunity to read about these things instead.

The reasons to continue funding and protecting our school libraries are countless. For the sake of your time, I've only included two. I am begging you to please protect our kids' access to high-quality library services.

Sincerely,

Kelsey Hoskins BHS English Department

As a retired elementary teacher, I can assure you that these positions are integral to a quality education. The librarians that I had the opportunity to work with not only introduced students to literature, but reinforced content in all subject areas. They worked with students in a unique setting that encouraged individuals to extend their learning and increased their ability to initiate their own inquiries. They taught problem solving, questioning skills and investigation processes, then provided resources and support to ensure successful learning experiences for their students. School counselors are often lifelines to students experiencing difficulties or trauma. They not only work with students to teach them adaptation and coping skills in order to be

successful in the classroom and community, but also facilitate teacher professional development so that issues can be addressed earlier and more efficiently. Lowering the ratios for these key positions in schools will adversely impact student learning and success and unfairly targets rural schools with fewer students.
Kristy Michael Retired Educator Bozeman

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Yours sincerely,
Marty Laib

PLEASE do not lower the number of librarians in schools in Montana. One of the most important and memorable people of my childhood was the school librarian. We need more of them, not fewer. Sally Brown I'm emailing to make it known how important our school librarians and counselors are to students throughout MT. It is important to keep the ratios so that our students needs are being met!! These positions are important for SEL as well as all areas in my child's life on a daily basis. It's bad enough the electronics in schools. Please don't take away the NON-electronic dependable communication promoting positions in our schools. Or why bother sending our kids to face to face schooling.
Sam

Please maintain the librarian ratio. Librarians and libraries are a critical part of the public school system. Librarians are responsible for key skills for all students that will last them a lifetime. Not only do librarians emphasize love for books and reading they also help students decipher internet facts from fiction, recognize fake news, and identify irrelevant websites. Librarians teach classes AND run a library that includes collection development, circulation, book care, book fairs, reading clubs, etc. If librarians are minimized in schools students and teachers will suffer and in the long run, our communities and our state.
Thank you

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Sharon Stoneback

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Yours sincerely,
tona lwen

People do not automatically know how to use a library. I know this from 9 years spent working in libraries. It is with the help of trained librarians that they learn the tools necessary to find information, be it for academics or personal enjoyment. Think of the frustration people feel when they walk into a store and there is no one to provide any type of customer service. What happens? They leave never to return. Do you really think it's a good idea for that to happen with libraries? Sure, you can say "well, there's the internet." But with all of the misinformation out there, how do students know what is true or not? How do they know where to find legitimate resources? Well, one obvious answer is librarians. And the fact that Ms. Arntzen thinks that cutting back on school counselors is just mind-boggling. Studies are too numerous to list here. Children being quarantined and missing out on key developmental milestones, bullying, depression, isolation..... there are all reasons that school counselors are more in need than ever before. By limiting the number of counselors per each 400 students, we will potentially be missing behaviors that could be precursors to mass shootings and suicides. I don't really think that any of you want that for Montana's children. Students must have a well-rounded education. Art is just as important as science to be a well-balanced human being. You may think that it is not important, but can any of you really imagine a world with music, photography, painting, dance? Many students, especially in rural areas, only have the opportunity to be exposed to the arts in school. Taking that away removes an important part of childhood development. And then, to top all of that off, Ms. Arntzen wants to remove program and content standards? She wants to remove requirements that student complete a certain number of English, math, science, and social studies courses? Why? This is one of the most ludicrous recommendations that I think I have ever heard when it comes to public education? And if removed, those students will consistently rank behind students whose parents had enough money to send them to private school. That is the antithesis of what a public education should provide. Elsie Arntzen is trying to destroy the Montana public education system. I implore you to stop her – to maintain and preserve specific elective and credit requirements and to keep up the number of librarians and school counselors available – from destroying that which is a fundamental right: FREE QUALITY PUBLIC EDUCATION! Thank you for your time. Wendy Maltonic (she/her/hers)

Please do not change the ratio of students to school librarians. For the past 30 years, the existing ratio has functioned well for our state creating equitable, literacy rich, learning school environments for Montana's urban and rural communities.

The services provided to students, staff and the community by certified school librarians is invaluable. Montana's librarians are certified teachers with a library endorsement, so they use their teaching skills paired with special training in information literacy and reading to respond to the reading and research needs of their students.

These skills are extensive and cannot be replaced with a person who is not a certified teacher with a library endorsement. Many of these skills involve teaching students information literacy lessons: how to cite sources, how to locate and gather information from a variety of sources (books, databases, interviews, online), how to evaluate the reliability of sources, how to present gathered information using a variety of products, ...

As I'm writing this, I realize I would be up all night, describing the ways in which librarians help students and schools achieve success. For the past 31 years, I have taught in public schools, the first sixteen years as a 5th-12th grade English and French teacher and the last fifteen years as a librarian at Chief Joseph Middle School in Bozeman. As a librarian, each moment of my school day is filled with finding that "just right" book for a student, collaboratively planning and teaching research lessons with other teachers, promoting our student book club-the largest club in the school with 140+ students, celebrating young adult literature with a staff book club, pulling book carts for teachers' classrooms on research topics, and the list goes on. Being a librarian is a

dynamic position which positively affects the whole school community. I cannot imagine large and small districts in Montana not having the same access to libraries and librarians as they have had for the past 30 years. Eliminating the existing ratio of students to school librarians would be eliminating a vital part of our students' education.

Sincerely,
Niki Keuch

I have proudly served Belgrade School District as a library media specialist for 16 years. Our district has five bustling school libraries staffed by seven full-time, certified librarians. We have worked tirelessly to create a district-wide library program to serve our school community.

What we do matters. We provide academic support for students needing resources or personalized instruction. We teach kids to use technology responsibly and to critically evaluate sources. We make readers out of even the most reluctant students. We provide a safe haven for many students who struggle socially or emotionally. We assist our English Language Learner students as they adapt to a new environment. We collaborate with classroom teachers to help enrich and deepen their curricula. We engage in literacy coaching for our struggling readers. We offer professional development for staff who are looking to integrate more educational technology in their classrooms. We vet quality library resources and texts to fill our libraries, and then we promote and distribute those resources. We serve as a liaison between the schools and the community, often bringing local expertise to the classrooms. We do all of these things with passion because we know that what we do MATTERS.

Montana public schools are special. We have always set the bar high and valued fully-staffed schools and highly-qualified educators. Our kids need this now more than ever. To remove the ratio requirements for school librarians and counselors would be a travesty for our students.. Depriving our students of the essential services provided by librarians and counselors is not the answer! It will negatively impact students academically, emotionally, and socially. Montana kids deserve the best public education we can provide. If you eliminate staffing ratios, you are doing Montana's kids, educators and communities a great disservice. Our kids deserve better.

I urge you to continue to uphold the high standards we have always held in Montana Public Schools. Maintain the librarian and counselor staffing ratios. Allow us to continue the important work we do every day. Our students need us!

I am sharing a link to a 2018 article outlining a large body of research conducted over decades which consistently shows positive correlations between high-quality library programs and student achievement.

<https://kappanonline.org/lance-kachel-school-librarians-matter-years-research/> [kappanonline.org]

Sincerely,
Diane Horne

I am usually working with students in an after school setting and am unable to attend the Negotiated Rule Making Committee meeting on Wednesday. I am asking your help to my comment in your public discussion.

I have been a teacher and a librarian in Montana for almost 30 years. This includes schools in class C, A, and AA (past 23 years). Greatly changing/reducing librarian accreditation standards is a big mistake. Several studies out of Colorado and Washington show a positive correlation between school library access (with a certified librarian) and increased reading scores and college acceptance rates.

Thank you,
Mr. Don Casey

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

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

I was given a canned comment to make on this issue and I have chosen to make my own statement, instead.

We all have teachers that we recall as having made a change in our lives growing up--I do, too. But I also have a librarian to thank: Thelma Newby, who was my librarian in Bozeman Junior High in the 1960's. I was a smart aleck who thought too much of himself and goofed off when I should have been paying attention in Library period. Instead of rebuking or disciplining me, Thelma Newby engaged me about what a wonderful place libraries are and how they could enrich my life. Today I am the Chairman of the Missoula Library Foundation. The line between Thelma Newby and today is a straight line in my mind.

School librarians are the superheroes of our public schools. What they can add to a student's educational experience is something that can't be measured until it is taken away. We need to keep school librarians in place, doing the work whose value is inestimable. Everything teachers do is enhanced and enriched by school librarians. Doing ANYTHING to reduce their role will hurt our children.

Yours sincerely,

GEOFFREY T BADENOCH

Montana, 59801, United States

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.

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

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

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

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

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

I beg of you to reject Superintendent Arntzen's recommendations that Montana strike all existing librarian-to-student accreditation ratios in our schools. Librarians provide our students with critical thinking and analysis skills that they can apply throughout the rest of their lives. In a world with an increasing multiplicity of rapidly-accessible information, librarians teach students how to see through the digital noise, how to evaluate information, and how to make informed decisions. A just and healthy society consists of informed and active citizens and librarians are standing at the front lines, teaching our children how to live in and create that society. Moreover, the presence of certified librarians in schools can have a major, positive impact on reading scores and overall literacy. Finally, librarians and their centrally-located and openly-accessible library spaces provide an important haven for all students. In this historical moment, wherein we are seeing the rates of student stress, anxiety, isolation, and suicidal ideation rising alarmingly, the importance of such a haven cannot be overstated. Please protect these spaces and these professionals. Please reject the superintendent's recommendations. If possible, I would still encourage you to even reconsider recently proposed ratio changes that would downgrade the number of required certified librarians in our schools. Running a library is a complex and time-consuming job that requires both training and passion. We do not sit behind desks shushing children and checking books in and out. One cannot come out of college with simply a library endorsement in education. Each and every certified Montana school librarian has returned to school to become a librarian because we feel so strongly about the role of libraries in our education system. We are active, engaged, educators who do this work because we believe in our students and in our communities! We are already stretched thin with staffing in our libraries and imposing less rigorous accreditation standards in library media will only wind up hurting our students and our Montana communities in the long run. Please protect our school librarians!

Respectfully,

Brittany Miller

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

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 social 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

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

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 become increasing 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

As a retired elementary school teacher with 32 years experience, I am strongly opposed to eliminating librarians in the schools.

Morning Star School in Bozeman was designed with the library as the hub of the building. Our librarian co-ordinated lessons linking the classroom units with what the students learned in the library. She was a ready resource for the teachers when we were looking for books and materials to use with units in the classroom. As both a printed materials and technology teacher, she prepared the students to be lifelong learners in the 21st

century. She is a vital and integral member of the school community. It is imperative that a librarian be present in the library to keep the materials available and organized for student access.

Joyce Shea

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,

Jessica Yeagley

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

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

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

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

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 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

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.

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

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

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)

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,

Daniel Bruce

Montana, 59718, United States

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. As a public schools teacher in a Title 1 school I understand firsthand the importance appropriate staffing has for students, and the vital role librarians and school counselors provide for students. Eliminating current ratios would be detrimental for students and ultimately staff who have to take on the extra work.

Respectfully,

Aleta Carpenter

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

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

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,

Nicki Young

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,

Erin Thorsen
Montana, 59501, United States

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,

Nancy Peterson

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,

Carol Dolan

Montana, 59601, United States

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,

dawn Podolske

Montana, 59801, United States

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Yours sincerely,

Erin Kemmis

Kindergarten Teacher

Montana, 59801, United States

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Yours sincerely,

Starri Nation

Montana, 59718, United States

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Yours sincerely,

Marty Ohs

Montana, 59718, United States

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Yours sincerely,

Scott smith

Montana, 59601, United States

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Best,

Ryan Wilford

Montana, 59718, United States

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Yours sincerely,

Noelle Hart

Montana, 59714, United States

I am a retired school librarian. 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,

Joan Meyer

Montana, 59602, United States

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Yours sincerely,

Denise J Grewell

Montana, 59102, United States

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,

June Jeziorski

Montana, 59102, United States

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Denise Grewell

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Yours sincerely,

Catherine Cramer

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Yours sincerely,

Kathleen K. Shea

Montana, United States

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Also, the same sentiment applies for elementary school counselors. With the lingering impacts of COVID and mental health crisis among young children, I find it recklessly ignorant to remove emotional support networks for students.

Yours sincerely,

Michael Lankford

Montana, 59718, United States

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Yours sincerely,

Ashley Powers

Montana, 59718, United States

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Candi Korf

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Yours sincerely,

Wendy Melvin

Montana, 59803, United States

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Morgan Benge

Montana, 59102, United States

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Yours sincerely,

Tiffany Reed

Montana, 59802, United States

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Yours sincerely,

Tammy Taylor

Montana, 59016, United States

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Yours sincerely,

jan krug

Montana, 59801, United States

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Steven Riccio

Montana, 59718, United States

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Yours sincerely,

Tracey Tounsley

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Bärbel Pafford

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James Whitworth

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Yours sincerely,

Johanna Elsonbaty

Montana, 59106, United States

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David Maughan

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Amy Brummit

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Kailey Lamping

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Yours sincerely,

Anna Adams

Montana, 59808, United States

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Marilie Vesledahl

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Yours sincerely,

Brenda Gallagher

Montana, 59714, United States

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Gina Ingalls

Montana, 59808, United States

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Yours sincerely,

chelsy riddle

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Yours sincerely,

Cristin Stokes

Montana, 59715, United States

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Yours sincerely,

Shannon Ortt

Montana, 59801, United States

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Yours sincerely,

Lindsey King

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Erin Regele

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Lauryn Windham

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Yours sincerely,

Bryan Dufresne

Montana, 59840, United States

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Aszia Knight

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Yours sincerely,

Johanna Moore

Montana, 59718, United States

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools.

Our schools have a long history of providing the best well rounded education possible for our students. Through fully funded and staffed libraries as well as music, exploratory and counseling, our Montana students flourish.

Taking away the librarian requirements is a sure plan for failure. We have seen the negative impacts of cutting back on libraries across our country. You have a chance to block these cuts in Montana. Our students deserve libraries and librarians as a part of their education. Please vote against these devastating changes.

Yours sincerely,

Gretchen Murray

Montana, 59802, United States

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,

Courtney Zundel

Montana, 59106, United States

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Yours sincerely,

Brittany Perkins

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Lianna Wallee

Montana, 59808, United States

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Yours sincerely,

Dani Pallister

Montana, 59601, United States

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Yours sincerely,

Josie Hayes-Johnson

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Yours sincerely,

Jacob McEachern

Montana, 59602, United States

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools.

As a public librarian working next to a middle school with a library with limited hours, I've been seeing classes come to our library instead. These students are hungry for books. Most of them don't visit the public library for the simple reason that they don't have transportation. It isn't among their parents' priorities to bring them here. That is why a dedicated librarian in the schools is so necessary. Without the exposure and assistance in the schools, many students will not be reading and learning.

Yours sincerely,

Mary Drew Powers

Montana, 59937, United States

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools along with the proposed cuts in music, arts and counseling.

After 21 years as a band director in public schools, I went to school for my library endorsement. There is so much that goes into our library world. Materials selection, technology, curriculum enhancement, staff support, providing a safe space for students, along with helping students choose that "just right book". These are skills that need to be worked on and trained for. This is not something that just any person can do for our students. From Media Literacy to pleasure reading, libraries are an integral part of a student's day. PLEASE DO NOT TAKE THIS AWAY FROM OUR STUDENTS!!!

All of my teaching career (21 years in music and now 14 in library) has been promoting the education of the "whole child". Qualified teachers provide this necessary piece of the educational puzzle to every child.

Please vote against these devastating changes. Stop in and hear a school concert or visit with students about the impact that libraries, music and the arts have made in their lives. You'll be glad you did for our children deserve the very best education!

Yours sincerely,

Gretchen Murray

Montana, 59802, United States

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Yours sincerely,

Sidney Hahn

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Kassi Meyer

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Yours sincerely,

Kourtnei McHugh

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Yours sincerely,

Leigh Barnes, MLS, MEd

Pennsylvania, 18428, United States

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Yours sincerely,

Calvin Olson

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,

Bri Ward

Montana, 59701, United States

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Yours sincerely,

Shasta McCorry

Montana, 59105, United States

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Yours sincerely,

Leslie Lukas

Montana, 59602, United States

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Yours sincerely,

Hayley Botnen

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Yours sincerely,

Graydon

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Yours sincerely,

Julie Burkhart

Montana, 59803, United States

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Yours sincerely,

Leah Hurless

Montana, 59044, United States

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Yours sincerely,
Kimberly MacDonald

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Yours sincerely,
Holli Halama
Montana, 59102, United States

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Yours sincerely,
Sher Ehret
Montana, 59601, United States

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Yours sincerely,
Patty Dean
Montana, 59601, United States

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Yours sincerely,

Angie Johnson

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Yours sincerely,

KRISTEN HERGETT

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,

Dan Johnson

Montana, 59101, United States

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Yours sincerely,

Betsy Nordell

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Yours sincerely,

Jason Shumaker

Montana, 59801, United States

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Yours sincerely,

David Culbertson

Montana, 59001, United States

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Yours sincerely,

Molly Tingley

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Yours sincerely,

Jacqueline Locke

Montana, 59840, United States

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Emily Wilson

Washington Middle School

My name is Kraig Rieger, and I'm the high school Librarian and Yearbook advisor at Manhattan High School. I echo the same sentiments as other Librarians in the state of Montana concerning the chapter 55 ratio of Librarians to students and will paste it below:

"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."

Kraig Rieger

Manhattan High School

High School Librarian

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Yours sincerely,

hannah grigalunas

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Yours sincerely,

Emma Kelly

Montana, 59718, United States

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Yours sincerely,

Anne Kish

Montana, 59754, United States

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Yours sincerely,

Lynne and Dave Dickman

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Yours sincerely,

Alison Ulrich

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Yours sincerely,

Allie Carter

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Yours sincerely,

Whitney Fisher

Montana, 59034, United States

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Yours sincerely,

Michael Heriza

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Yours sincerely,

Sasha Lindberg

Montana, 59714, United States

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Yours sincerely,

Janice Pavlock

Montana, 59865, United States

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Yours sincerely,

Jenny Mish

Montana, 59801, United States

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Yours sincerely,

Kris Fears

Montana, 59101, United States

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Yours sincerely,

Jessica Morrison

Montana, 59501, United States

To Whom It May Concern:

I am writing to emphasize that access to certified librarians and mental health professionals is important for Montana's public school students. Please do not implement Elsie Arntzen's recommendations on required staffing ratios for librarians and counselors in our schools. While this change may attempt to help with staffing concerns in rural schools, there is the very real possibility that larger districts, like my own, will eliminate these very important positions in order to correct "budget issues." Doing this would be detrimental to all Montana students, teachers, schools, and communities. To quote the National Association of School Psychologists, "Research demonstrates that students who receive social-emotional and mental and behavioral health support achieve better academically. School climate, classroom behavior, engagement in learning, and students' sense of connectedness and well-being all improve as well. Mental health is not simply the absence of mental illness but also encompasses wellness promotion; social, emotional, and behavioral health; and the ability to cope with life's challenges. Left unmet, mental health problems are linked to costly negative outcomes such as academic and behavior problems, dropping out, and delinquency. Mental and behavioral health problems not only affect students' short-term classroom engagement, but also interfere with long-term development of positive relationships and work-related skills" ([NASP \[nasponline.org\]](http://nasponline.org)).

Additionally, I am also very concerned about the language in Elsie's recommendations regarding eliminating electives in middle schools. Doing so would take away students' access to creative media classes, art classes, career education classes, physical education classes, band and orchestra classes, and choir classes, as well as change the requirements for core classes. Many of our Montana students come from low-income families who cannot afford to provide these very important opportunities to their children. If we don't offer these in

school, these students may never be able to access them! Our students deserve to have these programs in their schools. Over twenty years of studies have shown that access to the arts and other creative outlets increases math and reading scores, which Elsie repeatedly says are the priorities of the Office of Public Instruction. In fact, the *Journal of Psychology of Aesthetics, Creativity, and the Arts* found that “students who were exposed to an arts elective in middle school ‘had significantly higher GPAs and math and reading scores, and decreased odds of school suspension, compared to students not exposed to the arts’” (“[Can Arts Education in School Improve Academic Performance? \[studyinternational.com\]](http://studyinternational.com)”).

Please, please reconsider these changes. I am speaking to you both as a Montana educator and the parent of a middle school student currently attending a Montana public school. The negative ramifications of such actions would be felt for years to come.

Brittany Parson-Sillstrop

Tristen,

I have spent over 20 years in public elementary education. I can tell you that the counselor and librarian ratio needs to stay where it is (or we need more of them, not less).

We are trying desperately to emerge from this deadly pandemic and the mental health of EVERYONE is suffering! The hopelessness that these children have faced and continue to face is written on their faces. If we don't hire MORE counselors we are going to see more suicides and school shootings. We need to be proactive and not reactive. In the two decades that I have worked in the public school setting I have seen things get worse. Stripping funding for vital programs is not the way to solve the problem.

Librarians serve a vital purpose that many do not even realize. They not only manage & organize the books in the library but teach students how to navigate the internet safely. With predators lurking everywhere to lure our children we need these gatekeepers to help keep them safe. If you make our librarians travel between two to three schools these lessons will probably be cut just because there will be no time for them, thus putting our students in danger.

My question for those that make these "rules" is "When is the last time you stepped inside a school and have seen what is going on daily?" & "When is the last time any one has actually asked or cared to ask the people who do the work that matters EVER day in our public schools what they could **use** or **need** to educate our most precious resource?" We need common sense in government. I ask that those who still have a little of that left do the right thing and keep the ratio the same. I also ask that you come and visit with us and we will gladly show you how difficult the days have become. Thank you for listening. If you have any questions don't hesitate to reach out.

Brenda Laramore

Secretary

To Whom This Does Concern:

The recommended changes to accreditation for Montana students will decimate the current standards. The term "or its equivalent" is so broad and ill-defined that it will create a sub-standard curriculum of "anything goes." Staffing changes need to be based per school and district, not a general sweeping of every school in Montana.

Librarians are IMPORTANT. Access to school counselors is VITAL. The audacity to even consider removing or reducing middle school student access to music, world languages, visual arts, career education, exploratory courses, etc. is offensive and damaging.

As a Montana middle and high school graduate, as well as the mother of three Montana middle and high school students, I can't even begin to comprehend the destruction these proposed changes would have on our adults of tomorrow. Even though past the age of 40 I still use skills and information that librarians, counselors, music teachers, world history teachers, band teachers, and other extremely important educators taught me. I can't imagine the education for my own children if they hadn't had access to the same.

The least this state can do in unprecedented times like these is to maintain or increase the librarian and counselor ratios.

Thank you,

Mrs. Melissa Ryan

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. Kids need libraries and librarians!

Yours sincerely,
Marne Bender

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Yours sincerely,
Leslie Foley

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Yours sincerely,
Margaret Latrielle

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Yours sincerely,
dani edwards

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Yours sincerely,
Amanda Powers

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Yours sincerely,
Bonnie Young

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Yours sincerely,
Diane Mickelson

I object to changing language regarding the ratio of librarians to students. Librarians provide an essential role within the school and with student achievement. Librarians teach media literacy, appropriate use of social media, provide cooperative learning opportunities, and promote reading for enjoyment.

Research has proven that schools with certified librarians perform better on student achievement measures. Librarians work cooperatively with classroom teachers to provide current reference material, to teach ethical research skills, and the appropriate use of technology. Many librarians are incorporating STEAM into their curriculum to build the necessary career readiness skills students will need to be successful in their future.

By decreasing the number of librarians, you would be decreasing the number of adults who have consistent contact with students each year students are in a specific building. Many librarians serve students for 4 or more years in a student's educational journey. This consistency provides a safe place for students to pursue their interests and the ability to build a strong personal connection.

I ask that you keep the current librarian ratio when reviewing the rule changes.

Teresa Makela

Good afternoon,

I just became aware of the changes that the Office of Public Education is proposing. After reading through them I implore you to slow down and look more closely at what you are offering up.

As a teacher, I see some huge red flags and have some first thoughts:

We should never cut anything in the arts or library. Just never. Those things are gifts for our kids and society as a whole.

Access to counseling in schools is everything for children whose families cannot or will not set them up with help. And every headline I see reiterates the fact that our kids' mental health has never been in more danger. That this is even on the table boggles the mind and puts the whole rest of the document on high alert for me.

I get budget concerns. Especially for the smaller districts. I grew up in a small town and attended a small school. There were 15 kids in my class. I understand the challenges those districts face. I always tell the story of having one foreign language offered to us as high schoolers. It was German, and it was because our English teacher had spent a year there in the Marines. Was is super quality German? Probably not. But he was a teacher there and they made it work. They got creative. He was a good teacher and I was very lucky to have learned a second language and traveled to Germany twice. Instead of making cuts let's look around and make things happen. Now with technology I can't imagine that we can't offer our kids more and not less.

We need quality trained teachers who are given FTE status for compensation and benefits. We need them to give our students a variety of classes that teach life skills and problem solving. If all our students leave with is the basics of reading and writing and math we will be a sad society indeed.

Please. Go back to the drawing table. Take the time and do the work you have been elected or delegated to do. Our kids and our community depend greatly on a strong education program and all I can see in the quick read through of these proposals is important things being whittled away. And this last minute awareness feels like a back door deal and shady in all the ways. I expect better and our kids deserve better.

Thank you.

Respectfully,

Meredith Johnson

In Regards to the school accreditations standards proposed by Superintendent Elsie Artzen I have the following comments:

I thinking limiting the FTE standards for librarians and counselors is a big mistake. It will leave many schools without adequate coverage for these crucial programs in our public schools. During a time of increased mental health problems for students it is not a time to be limiting services for counseling. Librarians also are crucial to the development of quality education. Librarians do far more than read books to students. They help develop unit studies in collaboration with classroom teachers and teach students critical research skills. In many communities Library classes also provide for Prep time for regular classroom teachers. How will adequate Prep time be covered if the FTE for librarians is cut ?

It also appears that the Superintendent is recommending cutting minimum science classes from Middle Schools. I can think of no rationale for that. She also recommended cutting language that provides for planning a middle school curriculum that meets the unique needs of students that age. All curriculum should meet the needs of the cognitive, physical, emotional and social needs of the students it serves. Cutting that language makes no sense – isn't meeting the needs of students the responsibility of education?

I also wonder why the new language limits meeting the distinct and unique culture heritage to that of Native American students only ? Although I feel that is important I think it would be more fair that curriculum meets the distinct and unique cultural heritage of students.

I also see a recommendation for eliminating the statement that students could graduate with less than 4 years. If a student is able to meet all the graduation requirements in a shorter amount of time why would we not allow that? Each students life experience and abilities is unique and the amount of time they need to meet those requirements is individual. Some may need more time and that also should be allowed.

One change that I am a fan of is adding the ½ credit of economic and financial education literacy to the highs school curriculum. I am glad to see that recommendation.

Sincerely,

Lanita C Barnhart M. Ed.

Retired Teacher

I am a k-1 library teacher serving a school of approx. 300 and I am overwhelmingly busy!!! Librarians have limitless demands on their time.

The children love the library and they love having access to books! I have each class for half an hour each week and work to allow better access for the children for book exchanges on their other days.

Colorado has done studies that show the significant positive impact of library programs on overall student achievement.

Librarians are also called in to keep track of technology equipment that is checked out to individual students in response to pandemic needs. This access to technology causes an incredible demand on librarians time!

This is not a time for education institutions to limit availability of trained professionals in the area of information access for our youth!

To allow a lower ratio between librarians and students would mean that students would not develop the ability to access and identify reliable information as is necessary for members of a democracy! Dale Hannon, Cherry Valley Elementary, Polson

Hi there,

I'm an elementary school teacher in Missoula. I do not support Supt. Artzen's recommendation to cut library and mental health services in Montana's schools. These services and the qualified professionals that deliver them are vital to the health and well being of our schools, and ultimately, to our community.

Access to libraries and the librarians that make them a safe place to be helps ensure student access to high quality books and promotes a love of reading. Many students without books at home rely on these books and the care from the librarian to find the perfect book.

Without mental health and counseling in our schools, students health, well being, and education will be negatively impacted.

I do not support Supt. Artzen's recommendation and I urge you not to either.

Sincerely,
Olivia DeJohn

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.

Please pay attention to the numerous studies that show that students who have a full-time librarian in their schools perform better on their reading and writing scores than those who don't have one. This is more important than even with the decrease in reading and writing skills brought to us by overindulgence in social media.

Yours sincerely,
Janet Childress

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,
Gretchen Murray

To the Negotiated Rules Making Committee:

Please do not agree to the proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. This system has worked to protect library services in small school districts (and a similar system is used by the state library for community services) for many decades. Why change something that isn't broken? There is no substitute for trained specialists, and school librarians are teachers who help maintain excellence in education for every student. The ratio system works and is staying with it is the wisest choice 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,
Beth Antonopulos

To the Negotiated Rules Making Committee:

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Yours sincerely,
Paula Beswick

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Yours sincerely,
Jennifer Hossack

To the Negotiated Rules Making Committee and Board of Public Education:

I am writing today to vehemently 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.

I am the Children Services Librarian at Lewis & Clark Library in Helena, and I have two children in the Helena School District. I work with the Teacher-Librarians to engage and educate our community. Library services for children and teenagers extend far beyond storytimes and pleasure reading. Teacher-Librarians in our community provide necessary lessons on media literacy, research skills, technology, and they encourage students to find their path of lifelong learning.

While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Valuable resources will be lost to our community and state if the ratios of school librarians are significantly diminished by the proposed change to Chapter 55.

Yours sincerely,
Molly Hudson

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,
Brianna Lipke

To the Negotiated Rules Making Committee:

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Yours sincerely,
Dacia Vollin

To the Negotiated Rules Making Committee:

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Yours sincerely,
Jackie Wood

To the Negotiated Rules Making Committee:

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Yours sincerely,
Krystal Handford

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Yours sincerely,
Bethany Schatzke

To the Negotiated Rules Making Committee:

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Yours sincerely,
Crystal Thompson-Tower

To the Negotiated Rules Making Committee:

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Yours sincerely,
Stacey Keffeler

To the Negotiated Rules Making Committee:

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Yours sincerely,
Dylan Reed

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Yours sincerely,
Bradford Herron

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Yours sincerely,
Junell Lawrence

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Yours sincerely,
Erin Fuller

To the Negotiated Rules Making Committee:

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Yours sincerely,
Shawn Schweyen

To the Negotiated Rules Making Committee:

I value school librarians. Do you? It truly takes a village to raise a child, and our school librarians are essential components to ensuring student success.

The current ratio of students to librarians has been in place and working for over 30 years. Why would we change a successful program? That seems both unnecessary, and unwise.

I strongly oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. Please do not let this proposed change be a backdoor cut to school libraries across the state.

Sincerely,
Elizabeth Fullerton

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,
Kim Rott

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Yours sincerely,
Dayel Dunning

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Yours sincerely,
Pierce Chandler

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Yours sincerely,
Heidi Gunderson

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Yours sincerely,
Brandy Thrasher O'Neill

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Yours sincerely,
aderley murphy

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Yours sincerely,
Emily Wilson

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Yours sincerely,
JAIME Long

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.

The task force employed to review these documents spent hours researching, reviewing and discussing these issues coming up with recommended ratios. While the task forces recommendations may have left something to be desired, it is unconscionable and shameful that the state superintendent is disregarding them to promote her own political agenda.

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,
Johanna Freivalds

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Yours sincerely,
Lauren Dunlap

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Yours sincerely,
Kristi Laib

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Yours sincerely,
Toriw Wilson

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Yours sincerely,
STEF JOHNSON

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Yours sincerely,
Kathleen Herman

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Yours sincerely,
Christine Kombol

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Yours sincerely,
Shelley O'Rourke

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Yours sincerely,
Jamie Zier

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. As a lifelong user of libraries and now as a professional librarian, I can attest to the essential role school librarians play in the lives of students, both educationally and personally. Libraries are safe spaces to many, not to mention centers of knowledge for gaining valuable skills for later in life.

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,
Karli Cotton

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Yours sincerely,
Brenda Wilson

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the time to fish for extra curriculum support, librarians do because it's their job. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state because it will ultimately cut the support to those who need it most; classroom teachers.

Yours sincerely,
bev richardson

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Yours sincerely,
Jacquelyn Burgstrom

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Yours sincerely,
Cheree Bekker

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Yours sincerely,
Josephine Hupka

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Yours sincerely,
Christina Sieminski

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Yours sincerely,
Lydia Perry

To the Negotiated Rules Making Committee:

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

Please do not follow the recommendations proposed by Elsie Arntzen!!!!!! Her continued destruction of Montana public education is intolerable. We need librarians and libraries in our schools, not all families can afford to have a library at home and school libraries provide a wealth of information for students of all ages. We need counselors in our schools. Read the reports on mental health in the youth of America if you need further information, it is well documented. Students need to be able to express themselves through the arts, music and similar programs. These programs have proved to be helpful in the core subject areas-check the research! It is there you just have to put a little effort into it. Please stop the raping of the Montana public education system!!

Annette Efta

To whom it may concern:

I am writing this on behalf of my incredible middle school students.

I have taught middle school English Language Arts in Columbia Falls, Montana for 23 years. I am horrified at the possibility of critical programs in our middle school being dismantled. Our library is the heart of our school, full of vibrant student programs that put our kids first and help them find themselves in books. Our counselors offer life-changing support for all of our students, and many need it desperately. And, our elective programs, from band and choir to Family Consumer Sciences to Shop and Art all offer something for every kid to connect with. Countless students, including my own children, have expanded their thinking and experiences.

As a parent of three teenage children, I want them to be exposed to new ideas, to learn new skills that may bring them out of their comfort zones, and to be supported by knowledgeable adults. My teenagers now bring their middle school experiences to high school, where my son plays in two elite bands and my daughter finds joy in drawing classes. They both love to read, and our librarian played a huge role in that passion for books. Middle school elective teachers helped them find these paths, and I could not be more grateful.

As a teacher of a core subject, elective classes are the life blood of our building. Kids may only feel successful building a wooden train in shop, bravely performing a solo in choir, or learning to cook a meal and share it with others. These classes help our kids experience new content areas, integrate core subject areas like math and literacy into their curriculums, and often are the most hands-on learning our kids participate in. Core subjects like English and Math benefit directly from kids' experiences in elective classes. More importantly, these teachers and their subjects help kids feel seen and heard. Isn't that what we all want for our children?

We want all of our kids' lights to shine. Our librarians, counselors, shop, art, music, and other elective teachers help our kids shine even brighter. Cutting these programs would be catastrophic, leaving our buildings a shell of what they could be. It is especially critical for young adolescents to have numerous opportunities to learn more about who they are and what they are capable of, to test their ideas and potential in a safe, supportive environment. We all want successful, well-rounded members of society, and this does not just begin in high school.

Thank you,

Jennifer Robbins

7th Grade English Teacher

Columbia Falls, MT

It has been studied that schools with high quality library programs equate with high student achievement. With quality library programs it has also shown higher graduation rates and higher reading and writing scores. This is the case for all students but it benefits the at risk students too. Those who need access to a good librarian and an opportunity to read all the time. Please make sure all Montana students have access to quality library programs.

Why do we not want that for all of our students across the state of Montana?

Nancy Peterson

Teacher/Librarian

Paxson Elementary School

As a conservative teacher in rural Montana, I have done my best to give Elsie Arntzen the benefit of the doubt. I ended up leaving the union due to different the gross amount of propaganda Mrs. Arntzen was sending out during her campaign instead of coming into schools. I still voted for her hoping that as a conservative she would understand the education system like I see it. This decision was also due in part to having 3 kids in daycare, continuing to teach not to make any money but because I love kids, and being met with scathing calls and e-mails from her cronies about what a disgrace my decision was when I just wanted a couple of answers to things. I've kept mute because I don't owe an explanation to my personal decisions, but her plans to take away the ratio to provide librarians to rural schools is something I can't stay silent on. I've taught for 7 years in rural communities in the state of MT, the last 6 in Harlowton. During this time I've finished a certificate in Library Sciences and am almost done with a Masters in Curriculum and Instruction through MSU Bozeman. Librarians are so important. Wheatland county, our county, ranks 53 of 57 counties in the state of Montana for median family income based on the most recent census data. If you consider that Montana is in the lowest quartile nationwide, you can figure we are one of the poorest communities in America. We are also a community that would be affected. Our current librarian services a K-6 building, a 7-12 building and two schools on separate Hutterite colonies. His job is important, and truthfully we need more people serving in this role to make reading and access to reading material more equitable. Mrs. Arntzen doesn't know us. She doesn't come visit us, or see the work we are doing. She doesn't care about all schools or all students because if she did, this wouldn't even be something worth consideration. These are our schools and our kids. If you are student first, I urge you to rethink this and climb into the trenches of rural educators to see for yourself. My door is always open.

Taylor Olsen

Harlowton Public Schools

Dear Negotiated Rule Making Committee,

The recommendation to eliminate language regarding the housing of school libraries in a central location and the language regarding staffing ratios of librarians would be a loss for Montana schools and students. Libraries and librarians play an integral role in student success throughout K-12 education:

- We help develop students' literacy skills.
- We impact students' academic performance, with research showing that strong library programs are linked to better student scores on standardized tests in reading, improved student information literacy skills, and higher graduation rates.
- We provide equal access to print and digital resources, including diverse materials and resources for students of all ages, backgrounds, and learning styles.
- We are responsible for delivering student instruction from the Montana Content Standards.
- We teach essential skills in our standards, including 21st century skills, such as research, involving locating, reading, and evaluating online information.
- We collaborate with other educators to achieve their classroom goals.
- We provide staff with professional development, including information on print and digital resources available to them and information on how to integrate new technology.
- We are uniquely positioned to lead and support any technology related district goals for each school.
- We provide a central space all students and staff are welcome in, and a space which gives opportunities for all to explore personal interests, to solve problems, to learn literacy and research skills, and to become lifelong readers and learners.

Please view the included links below that provide research and data showing the importance and effectiveness of school libraries and librarians.

I urge you to consider these points and relevant research, and to maintain our current library and librarian ratios. Access to libraries and librarians is essential to the success of Montana students.

Respectfully,

Chelsey C. Davis
Four Georgians Elementary
Teacher Librarian

Hello~

I am an educator in Billings Public Schools, where I have worked for 21 years. I am writing to voice my concerns over the recommendations from our State Superintendent regarding the library accreditation standards. Frankly, I am appalled at the Ch 55 recommendations coming from our State Superintendent in all areas, including library, counseling, and middle school elective offerings. As a former educator, I would think Ms. Arntzen would hold higher standards for what we offer our students.

I can speak most directly to the library recommendations, although I am also concerned about the ramifications for school counselors.

As a lifelong reader, I've loved the library since I was in elementary school. I can fondly recall sitting in the "whistle chairs" at Beartooth Elementary reading the book I got to check out from the library that week. I remember the librarian taking us on adventures through the stories she read to us each week, learning the Dewey Decimal System so I was empowered to find my own books, completing research projects (I learned about dogs most of the time), and even typing a story on the Apple IICs. When I got to middle and high school, I loved being able to go to the libraries to find books (and sometimes sneak in a quick game of Oregon Trail). I can recall book talks from the librarians, recommending great new books to us, as well as lessons on citations, research procedures, and more. When I became a high school librarian six years ago, I was so excited to continue the tradition of helping students with scholastic work, teaching important life skills (digital citizenship, intellectual property, research), and to pass on my love of books. The recommendations from Ms. Arntzen make it possible for all of this to be lost.

It is imperative that the roles school librarians and school counselors are respected for the services they offer students. The proposed wording of the State Superintendent's recommendation does not take this into consideration. What I'm reading is that these roles are so undervalued that ONE school librarian or counselor could feasibly handle the work for an entire school system. First of all, I cannot imagine what that looks like, as my school alone has 2.5 librarians and our district has over 30. Second of all, it seems that these proposed changes are targeting students in rural schools, as the services offered to them could easily be diminished.

If you take a look at the New School Librarian Standards that came into effect in the last year, it is clear that this role requires more than

a single licensed and endorsed school librarian could handle for an entire system to be able to give the students the educational opportunities they deserve. While there is a certainly a (very archaic and stereotypical) misconception that the role of librarians is to check out, stamp, and shelve books, the responsibilities of this career entail so much more. We are to help students navigate the digital world they are living in responsibly, a task that many parents do not understand themselves, thus we could be the only adults in students' lives helping them control the digital footprint they are creating. Our standards include research skills which teachers from many curricular areas trust us to collaborate with, helping ensure that our students are not only prepared for post-secondary experiences (college, apprenticeships, the workforce), but also empowering them with the tools they need to form their own opinions. Through sharing our own love of literacy, we help create and grow students' love of reading, when many of them do not have access to books at home or parents who are willing or able to read with them. In the current climate of censorship, we use our training and knowledge to ensure that students have access to a variety of materials. And, we offer a safe haven for so

many students just by having our library doors open; a place to stay warm, study, meet friends, work on computers, or just escape the world in a good book.

All-in-all, I am begging you to reject the recommendations made by the State Superintendent, knowing that the repercussions of them would negatively impact Montana students now and in the future.

Cordially,

Shaundel Krumheuer

Proud Educator

Tristen,

I am a current teacher in Bozeman, Montana. It was brought to my attention that the Negotiated Rule Making Committee will consider Superintendent Arntzen's recommendations tomorrow and I was directed to you- that comments regarding accreditation should come directly to you.

Though I have many concerns about the recommendations from our Superintendent, the one that is most pressing to me is the recommendation regarding the reduction of funding for librarians and access to school libraries in the district. As an informed citizen, I'm aware that there is extreme controversy with Critical Race Theory and that there has been outrage by a small group of community members: choice exposure to LGBTQ literature in our school libraries and choice exposure to historical references that document the diverse history of our great country- our response should not be to reduce academic access for students who crave knowledge, crave reading, and crave relationships. We cannot politicize the restructure of public education.

Montana has led the nation in deaths by suicide for more than 40 years. Read that sentence again...*our state*- the one that you and I both are committed to serving public schools- is leading the United States of America in deaths by suicide- and yet, we are meeting to discuss the recommendations to reduce access to both a safe space for kids and access to enhancing academics and promoting reading.

In Bozeman School District, our core purpose is: *"Bozeman Public Schools exist to provide an outstanding education that inspires and ensures high achievement so every student can succeed and make a difference in a rapidly changing world community."*

In Bozeman School District, our Long-Range Strategic Plan includes the following:

- High Student Achievement: We are committed to ensuring that all students achieve at high levels.
- Early Literacy Goal: By 2025, 85% of all children entering Kindergarten will have requisite literacy skills as measured by Acadience platform.
- Grade Level Reading Goal: By 2025, 90% of all BSD7 3rd Grade Students will demonstrate grade-level reading skills by achieving a proficient score on the Acadience reading assessment at the end of the school year.

Goal Area 4: Student and Staff Safety/Health/Welfare:

- Advocate for appropriate mental health education and services for students, families, and staff.
- BSD7 Core Value #1: High Student Achievement: We are committed to ensuring that all students achieve at high levels.

Reducing student access to school librarians is in direct opposition of our district purpose and core values. Our librarians are teachers- they provide classes/workshops for students as they begin composing writing samples (supports Long-Range Strategic Plan). They teach how to cite works found within their library

(supports Long-Range Strategic Plan). Our librarians are committed to bridging literacy skill gaps and increasing student Lexile levels (supports Long-Range Strategic Plan). They provide a safe-space for students struggling to re-enter the classroom after an escalated incident and can't access a counselor or person from SAFE-TI (supports Goal Area 4). Our librarians are trauma-informed. They understand how trauma can impact both learning and behavior. In a world decimated by individuals who are afraid of diversity, these librarians in our district provide a place of respite for those students who are living in a world that tells them they are unworthy- that their identity is a farce, that their unstable mental health is a choice- they often feel ostracized and abandoned by their families and a community that abhors them...the librarian team shows up...for every single individual. I'd like to believe that they take the Montana suicide statistics more seriously than both you and I do- they see a need for a student and they fulfill it.

Our librarians also connect with our English Language Learner population. They work on increasing their own Spanish language skills so that they can help our ELL population integrate within our school. This year we have an influx of ELL students- many of whom came to our country alone to seek safety, many arrive to our school days after leaving Immigration and Customs Enforcement detention. This population of students has experienced trauma within their home country and arrived to ours living in fear and trauma. I am so incredibly thankful for the support our librarians- across our district- give to our ELL student population. Our librarians also work to provide resources for -and are club volunteers- the Native American Club and the club that allows students from our LGBTQ population to connect with one another for support: SAGA.

The University of Montana has published research-based suicide prevention interventions that I believe our Librarians are committed to. They understand that the national rate of deaths by suicide for children ages 10 to 17 is 10.5 per 100,000 and Montana youth die at a rate of 23 per 100,000. Montana youth are twice as likely as youth from other states to die by suicide. This statistic alone should speak volumes to the rule-making committee. Why would we remove a safe place and trauma-informed staff from a state suffering from adolescents committing suicide?

My job, as a teacher, seems simplistic: show up, welcome students no matter who they are, provide a safe space for all students to learn, and expose students to the high school math curriculum. In no way do I work as hard or as intentional as our librarians. I am not sure how we measure the value of core subject teachers vs. school counselors vs. elective teachers vs. librarians vs. custodians. I'm also not naïve to budget restraints, reduction in force, and reallocation of funds. I understand that as we move forward, there will be significant change- I'm just hopeful that the change isn't a direct result of a heated political climate and the noise from a select few. What I am hopeful for is that change comes from considering student need- no matter the capacity.

In 2020, Montana's literacy rate was 91.20%, making it the 16th most literate state in the United States. While Montana is finding success on a national scale, there is still 9% (more than 96,000 people) whose daily lives are affected by illiteracy. Wouldn't it be great if we were committed to increasing our literacy rate and becoming known for one of the top 10 most literate states in the U.S. rather than our current 1st place honor for suicides? In order to do that, our response does not need to be in school libraries. Perhaps we could look at local and state administrative salaries for reduction...but that's for another epistle.

Please consider sharing my- our- concerns with the committee.

Partnering alongside of you for Montana's youth,

Courtney

These programs are extremely important. The kids need the stability of these programs. There is currently a 13 year old girl that ran away and is missing in Belgrade that was just released from a treatment facility for mental

health, now more than ever these kids need the support. The libraries are also critical to supporting there creativity and support of knowledge and adventure. Please reconsider these programs monetary support.

Kendra Drake

I am submitting this email to voice my concerns and objection to Supt. Arntzen's proposed cuts to our public education system. 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.

This year alone, I have had to deal with another child who brought a loaded weapon into my kids' school as well as having to report another child for self harm. This doesn't include the anti-LGBTQIA book challenges, anti-science and anti-factual curriculum challenges that have been making the rounds in our country.

Our school librarians were critical in laying the foundation for why these book bans were an awful idea and why books like these are vital to our library collections in our public schools. Books are a valuable resource when children (and adults) are struggling with various issues they may face in life.

Our teachers made compelling arguments as to why the curriculum they reviewed and adopted was appropriate, fact-based, and valuable teaching tools. Despite the anti-factual and anti-science crowd pushing back.

Our school counselors have had the most direct, and valuable impact on my family this year. They are the front lines (along with all other teachers and staff in each individual school). THEY are the ones who see when a student is struggling. They are the ones who can reach out and provide comfort and support. The guidance counselor at our school is the one who immediately responded to my concerns about a student who was self-harming. He was able to immediately speak with the student and connect the student with resources that could ultimately save this student's life.

Any and all programs on Supt. Arntzen's chopping block are critical to the health and well-being of not only our students, but the greater public-at-large.

DO NOT CUT SERVICES TO OUR PUBLIC SCHOOLS!

Brookelyn Conner
Billings, MT 59102

Hello MT Board of Education,

My name is Abby Holm. I am a Montana native who graduated from Hellgate High School and I a mom of a 10 year old fifth grader at Smith School in Helena. Public education is a core value of mine and I have been privileged and blessed to experience the exceptional work of our educators and local schools both as a student myself and for my daughter. The education that the Montana public school system provides has always valued our students as unique individual members of society and ensured their needs as individuals are addressed, through counseling, opportunity for diverse learning and activities, and supportive dedicated staff who can give them the attention they deserve. Without established student to counselor ratios and clear guidelines for broad curriculum expectations, children will be more at risk and fall through the cracks. My daughter is just one example of this. She struggled her first few years at Smith and library was the one class she really enjoyed. She had the opportunity to connect with the librarian and could, within the shelves of books, experience a space where she felt relaxed, comfortable and safe to learn and explore. She is now ready to move onto middle school and has blossomed into a curious learner who loves most subjects. However, I hate to think

what her path toward middle school would have looked like without her access to the library and the librarian who welcomed her into that space.

I feel lucky to call Montana home because we have always valued our schools and public education, both in urban and rural communities. Our state succeeds when our kids thrive. My experience has shown me that kids thrive when we ensure access and resources are available to all of our kiddos. I am asking you to oppose OPI Superintendent Artzen's recommendations for removing the specific program requirements in areas such as music, visual art, world languages, etc., that you oppose the removal of core curriculum components, that you oppose the removal of the requirements for library media services, and you oppose the removal of school counseling staff requirements.

Thank you for your time,
Abby Holm
Helena, MT

Please don't cut our librarians further. We need their help in our classrooms and in our schools.

Amber Erlenbusch
Learning Center
Poly Drive Elementary

In rural Montana, the school library is the only access to reading and research materials. Please maintain the current ratio in order to serve our students.
Dayna McClure
Polson, MT

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,
Stacy Clement
Montana, 59601, United States

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 a good ratio is best for our students. School librarians are a position that if eliminated also

eliminates a whole department. Please do not let this proposed change to Chapter 55 occur; if it does, it will damage school libraries across the state.

Yours sincerely,
James Waldby

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Yours sincerely,
Jennifer Iverson
United States

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Yours sincerely,
Patty Buckley
Montana, 59601, United States

To the Negotiated Rules Making Committee:

I oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools.

The work of school librarians is much more extensive than when I was a school child; now in addition to books there are many types of media and educational sources. It's a poor time to reduce staff.

Yours sincerely,
Stephanie J Brancati
Montana, 59910, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Breezy Rhinehart
Montana, 59801, United States

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Yours sincerely,
Cheri176 Bergeron

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Yours sincerely,
Emily Glasson
Montana, 59937, United States

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Yours sincerely,
Laura Shirliff
Montana, 59601, United States

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As a teacher, I rely on the librarians to help support literacy for all students.

Yours sincerely,
Christine Thennis
Montana, 59601, United States

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Yours sincerely,
Melanie Korthas
Montana, 59714, United States

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 provide safe spaces for students and help maintain excellence in education. They provide a well-balanced support structure that ensures every student has an opportunity to be supported by trusted adults within the school. 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,
Megan Emmot
Montana, 59937, United States

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Yours sincerely,
Brittany Miller
Montana, 59714, United States

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Yours sincerely,
Emily Nelson

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Yours sincerely,
James Lehnert
United States

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Yours sincerely,
Julia Harris

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Yours sincerely,
Johanna Trout

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Yours sincerely,
Leah Ore

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Yours sincerely,
Ramona Celander

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Yours sincerely,
Jennifer Ryan

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Yours sincerely,
Megan Pfaff

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Yours sincerely,
Cody Melton

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Yours sincerely,
Jim OMalley

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Yours sincerely,
Sara Flanery

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Yours sincerely,
Diane Horne

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Yours sincerely,
Erica Parrish

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Yours sincerely,
donna maughlin

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Yours sincerely,
Mikal Overturf

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Yours sincerely,
Crystal Kobayashi

To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55. More than ever, it is essential that Montana children have a equal opportunity to access the information they seek. School librarians are essential in guiding students in their learning journey. Reducing the ratio will only harm our children.

Yours sincerely,
Matthew Thome

To the Negotiated Rules Making Committee:

I was given a canned comment to make on this issue and I have chosen to make my own statement.

We all have teachers that we recall as having made a change in our lives growing up--I do, too. But I also have a librarian to thank. Thelma Newby who was my librarian in Bozeman Junior High in the 1960's. I was a smart aleck who thought too much of himself and goofed off when I should have been paying attention in Library period. Instead of rebuking or disciplining me, Thelma Newby engaged me about what a wonderful place libraries are and how they could enrich my life. Today I am the Chairman of the Missoula Library Foundation. The line between Thelma Newby and today is a straight line in my mind.

School librarians are the superheroes of our public schools. What they can add to a student's educational experience is something that can't be measured until it is taken away. We need to keep school librarians in place, doing the work whose value is inestimable. Everything teachers do is enhanced and enriched by school librarians. Doing ANYTHING to reduce their role will hurt our children.

Yours sincerely,
GEOFFREY T BADENOGH

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,
Corey Boone
Montana, 59808, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Sara Bramblett
Montana, 59829, United States

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Yours sincerely,
Heather Morrison
Montana, 59912, United States

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Yours sincerely,
Kerry Zahn

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Yours sincerely,
Charity Stubb

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Yours sincerely,
Carolyn Bachtold

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Yours sincerely,
Steve McCormick

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. As an employee at the University of Montana, who works with many Montana students, I know the importance of a great k-12 education for early adulthood.

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. Maintaining functioning libraries for our youngest citizens ensures a literate citizenry and workforce.

Yours sincerely,
Kylla Benes

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. Good readers make good citizens, community members, members of our job force and are important to me.

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,
Michelle Cares

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Yours sincerely,
Sandra Oss

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Yours sincerely,
Kristina McGee

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Wanda Rumley

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Judy Fjell

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Paul Yoakam

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Stephanie Rollins

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Yours sincerely,
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Yours sincerely,
Adria Brandvold

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Yours sincerely,
Marlee Congdon

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Yours sincerely,
Tara Smart

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Yours sincerely,
Mara Osborne

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Yours sincerely,
Nancy Singleton, retired public school teacher and administrator Montana, 59801, United States

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Yours sincerely,
Nicole SarrazinStrong

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Alisa Hayes

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Yours sincerely,

Shirley Lindburg

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Yours sincerely,
Angie Dailey

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Hello,

My name is Jacob Hickey and I am a high school teacher in Bozeman. I would like to comment on proposed changes on Chapter 55.

I am opposed to all of the changes proposed by Superintendent Artzen. However the most concerning is the change in school library services. 10.55.709

I believe it is important to maintain or even increase current staffing levels in our libraries. Many schools around the state are making literacy and closing the achievement gaps created by literacy problems a part of their long term district goals. This being said, librarians are a crucial part of both helping students and teachers find and implement creative ways to improve literacy on a daily basis. I and many other teachers rely heavily on the services provided by our librarians to find creative ways to help students with literacy. That is why I am so against removing ratios listed in 10.55.709.

Thank you for your help in sharing my comments.

Dear Ms. Loveridge,

As a retired elementary teacher with a Master's in curriculum and instruction and library endorsement, I am writing to oppose changing the staffing requirements for school counselors and librarians. Our students need counselors today more than ever. Librarians teach essential skills for today's information

consumers. Libraries are the heart of education. If anything we should be supporting more counselors and vibrant libraries in our schools, for the benefit of all our children.

Thank you,

Linda Pilsworth

Dear Tristen: I would like to voice that lessening the school library services and counseling requirements is NOT in the best interest of our students as our schools struggle to gain their footing post covid. I know staff is stretched thin but now is not the time to decrease access to either of these services if public education is to move forward.

I encourage the Board of Public Education to vote NO in the proposed changes.

Sincerely,

Julie Miller

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I encourage the Board of Public Education to vote NO in the proposed changes.

Sincerely,

Julie Miller

I am strongly against the cuts to schools concerning librarians and counselors. I have been a teacher for 30 years. Twenty five of those were spent in special education. I can attest to the fact that due to Covid has increased the need for librarians due to reading levels and counselors due to social emotional needs.

As an 81 year old Montana native, born and raised in Glasgow, Mt, and a mother of three adult children who were raised in the public schools in Billings, I am stunned at the proposed cuts to school libraries and librarians, school counselors, arts, music, and career and technical classes.

Anyone who has read about the devastating impact Covid 19 has had on the mental health of our children, youth, and others should be shocked at the proposals to cut any services in our public school that could benefit those affected.

Libraries/librarian cuts? Many children and youth do not have access to books. Libraries are a sanctuary for those who are in need - both mentally and emotionally.

Music, the arts, drama, career and technical classes being cut? Many students' lives are enhanced by having these opportunities. Not everyone is an athlete. Not everyone attends college. Technical and career classes need to continue.

Please, put the future of ALL our children into any budget.

Thanks for your consideration,

I am strongly opposed to the changes that Supt. Artzen is proposing to standards for middle and high school education. I am a former Counselor/Librarian in a small rural school in Northeastern Montana and I know that those positions are key to the success of students and faculty. Without access to any kind of mental health services kids who are struggling (and statistics support the increased need and reduced services in Montana) we will see increased suicides and other harm to our students. We are losing our young people to suicide at the rate of 23 per 100,000 which is more than twice the National average. We rank #1 in the nation for suicidal thoughts.

Library services are vital to introducing students to the joys of reading, research and critical thinking. A library should be central to every school and limiting those services to class A and higher schools disadvantages those students who have limited access to services due to the communities in which they live.

I have had a Montana Public School Education from kindergarten through graduate school as did my husband. We both attended Class C schools as did our parents.

My children are also products of the Montana public school system. We have all benefited from various music and art programs. We have all taken courses that would be considered career or technical education courses. My daughter has a Spanish degree from MSU and got her start taking Latin and Spanish classes in high school. Three generations of our family have attended and excelled in Montana Public Schools.

Reducing these standards shows a lack of understanding and support for Montana public schools especially rural schools. I am begging the Negotiated Rules Making Committee to reject these changes and to support our future as exemplified by the current standards.

Susan Gecho Gobbs

Hello Tristen,

Where do these proposals come from. This is not only completely unfair to rural students and teachers it could gut many existing programs that rely on these ratios. This makes zero sense, especially after what students and teachers have been put through over the last two years, not to mention the 30+ years of underfunding education in this country. These are the kind of proposals that threaten our education system even further than it has already been damaged.

Maintain librarian and counselor ratios!!

Jimmy Pinjuv

To Whom This May Concern,

Thank you for allowing I, as well as other concerned citizens to respond to the current proposed changes presented by Elsie Arntzen.

As a third generation Montanan, teacher-librarian, and mother, I want to express my concerns to the proposed changes presented by Elsie Arntzen.

Teacher-librarians offer much to our schools and communities. Reducing the amount of librarians/ the amount of time a librarian can physically be at the school would be detrimental to the schools and communities that they serve. Librarians are more than people who check in and out books. It takes time to curate a collection of books and electronic materials that will best suit our students and teacher needs. Librarians teach students to

think critically, as well as teaching students how to find reliable sources with databases and how to better analyze and form opinions that can better help them, their families, and the communities they live in. Librarians foster a love of reading and have the skills and knowledge on how to best find materials to foster a life-long joy of learning. If there is not a librarian available/present in the building at the right time, how will librarians be able to provide their specific knowledge and skill sets to their students, staff, and communities? Libraries are the heart of the school in which they serve. It is where students can research on their own and develop the skills they need to become productive citizens in the future.

In a time where mental health services are needed more than ever, we need full time counselors in our Montana schools. Statistically Montana has always been in the top percentage of states having a high suicide rate. Please do not take away/reduce the skills and knowledge our school counselors offer to their students and families. There are many people in Montana that need the mental health services school counselors offer because they do not qualify for programs with assistance. Reducing the amount of time a school counselor can be in our school building would be tragic to all our Montana communities.

All schools, should be required to offer music and art courses. Giving schools the option, no matter the size of school or district, is unacceptable, at best. These are the courses that encourage kids to stay in school and enjoy learning and growing with others. I cannot imagine my personal childhood experience in school without these programs being mandatory.

In conclusion, I am proud to a Montanan and very happy with the education I received in my youth. Please reconsider what the current proposals will do to our schools and communities if they are no longer offered in a way that will truly serve our students, families, and Montana communities.

Sincerely,

Liesel Loveridge

Tristen,

After sending my email I thought about this more and spoke to my mother who is a retired public school teach of 40 years. I'd like to resubmit the way to explain this: Please see below

Many people impact children as they grow into literate, compassionate, self-assured adults. Beginning with loving parents and effective educators, students are guided to make wise decisions that enable them to flourish. It is imperative that our public school systems continue to support the professional experts who help our children with their growth.

Counselors are specifically trained to listen to children's concerns and help them work through difficult situations with positive outcomes. Students need ways to solve problems; counselors provide actionable solutions while creating comfort and understanding for the child.

Teachers also benefit from adequate counselor staffing. A student or students who are stressed can be disruptive to the classroom environment. Therefore, allowing time with the counselor gives the teacher an opportunity to continue instruction while the children's emotional needs are being addressed.

Librarians are also essential for an effective educational setting benefiting the overall learning atmosphere of public schools.

We need more counselors and librarians, not less!

To whom it may concern,

We need to maintain the current ratio (or even improve it) of counselors and librarians per x amount of students. Counselors help students in more ways than one may think. Their jobs are more than just making sure that the students in their charge are meeting the requirements necessary every year to move forward and eventually graduate. School counselors are often a resource of mental health care that many students can't receive otherwise, usually due to the cost. They often become a soundboard for students who are on the verge of crisis or in a crisis. Counselors lead their students through these crises and by doing so, help them to stay in school.

We are at a point in time where because of the pandemic and upheaval that had in students' lives and because of the state of affairs world wide and even within a state or community, students of various ages are contemplating suicide more frequently. Also more frequently, students are experiencing depressive episodes. Both of these can greatly derail a student's ability to function and keep up on their school work while also functioning within their peer groups. Counselors oftentimes are the people that these students seek out as a trusted individual because they know that their counselor will help them through this difficult time with no judgement, only heart.

I can't imagine what student's feel and face today, but I know how middle school and high school were for me. In short, those years were hell. If it hadn't been for my middle school counselor and my high school counselor, I more than likely would not be writing this email standing up for maintaining counselors within our schools. Both helped me in numerous ways and helped me stay the course while managing the difficult times I was having in my life away from school. School counselors are a necessity for all students, whether they use them beyond their capacity or not.

School counselors are more often found in your bigger school districts. In rural districts throughout this state, there aren't many counselors and the responsibility of a counselor often falls to the librarians in the community and schools. If we take away librarians or co-op them by sharing them with multiple schools in a district, we are not only putting a heftier workload on an already overworked position, but we are also burdening students. Students need another adult they can trust and turn to.

Also, librarians have a necessary function within the school. They help keep students up to date with current technologies when it comes to digital literacy and researching capabilities for various school projects. Again, digital literacy is necessary for students to continue on and do well in college and just about every position in the workforce. Schools in rural districts often face problems maintaining their digital literacy practices. If we stretch librarians in this area any thinner, we would be doing a great disservice to not only these communities that do not have affordable internet at their disposal but also students. Most students rely on library time and school libraries to get their internet and computer usage so that they can complete assignments for their classes in a timely manner.

When it comes to graduation requirements, we do not need to be stripping electives or other classes or changing the requirements in general unless the college boards state it as necessary. Changing graduation requirements would mean our students, who are already underprepared for college and life after high school, would become even more overwhelmed by the time they graduate high school. Also, if these requirements do not align with NCAA standards, even fewer of our students would be able to continue their education (providing they can afford it) and thus would not be able to receive the schooling and training they need in order to join the workforce in the field of their choosing.

Furthermore, there have been many studies done on why electives need to be offered at both a high school and a middle school level. These studies include facts that show the benefit even offering these classes gives students. Students who have electives and then take them are more likely to stay in school, more likely to graduate, more likely to receive better grades, less likely to get in trouble both in and out of school and less likely to experience depressive episodes up to and including dieing by suicide.

Middle schoolers also NEED to have coursework and classes catered to them. They are a whole different student than high school or elementary. Taking away these classes that directly impact and make middle schoolers feel seen means that we fail them on day one of them entering middle school.

How can students believe the adults in their lives are looking out for their best interests when select groups are doing all that they can to take away things that support them and give them the best chance at staying in school and having an equitable future upon graduation? Please do not change the ratios of counselors and librarians to students and please do not change graduation requirements up to stripping away electives. Schools need those things to function and give students the best chance at graduating and heading off to college.

Thank you for reading my opinion on these matters.

Sincerely,

Samantha Rispens, Candidate for HD 20

To the Negotiated Rules Making Committee:

I am writing today to oppose several of the proposed changes by Superintendent Arntzen. I was absolutely appalled when I heard and read about these changes. Clearly, Ms. Arntzen is completely out of touch with what is best for Montana students. I was shocked and saddened to hear that she feels reducing the number of school counselors, librarians, and eliminating elective courses is what is best for our kids.

I am a proud parent of three Helena School District students. My oldest son, a student at Capital High, found his passion for various trades through the electives offered at the middle school level. As a result, he became excited about school, found his friend group, and is currently working towards graduating and entering into a vocational program after graduation. Like so many others, he needed the elective courses early on to find his passion and be excited about his future. Please do not let Ms. Arntzen take this opportunity away from other kids.

I cannot say enough about the services provided by school counselors. After the last couple of years, our kids are experiencing or have experienced more trauma than we will ever know. Kids and their families need the guidance and mentorship provided by the counselors today more than ever. How can Superintendent Arntzen even think that eliminating school counselors is what is best for our children? What exactly is she hoping to accomplish by this irresponsible proposal?

School librarians play a vital role in the success of all students K-12. They provide students the opportunity to grow and learn in a number of different ways. The knowledge and skills gained through library instruction are lifelong skills. Connections librarians make with students is something that should be valued and not taken for granted.

Please do what is right for Montana's kids and vote no on all of these ridiculous proposals. Our future and the future of our kids depend on it!

Todd Crum

Thank you Tristen for accepting comments. Please pass these on to the committee.

1. Counseling Staff - In today's world where kids have greater mental health, emotional and social disturbances I can't believe a thought to decrease or eliminate this resource is even being considered. If anything it needs to be increased. There are numerous studies and reports regarding mental health issues and lack of support for your kids, especially in Montana. The solution isn't to then not try and offer or require it, but to figure out a way to make it happen! Had it not been for the counselors and mental health providers at my son's middle school, I would have had to pull him from public school and possibly even moved out of state for better resources.

2. Librarians - Our children need books and people who can help them find information. The internet is not the place for all information. It is not available to all and has many ways to not be trustworthy. Why do we want our kids to be on more electronic disconnected materials as well. Relying on the internet for our children to get all their information will only harm them.

3. Course requirements - Why are we decreasing the offerings of courses and education requirements for our students? We need to be increasing them. We are hurting them, our economy and our future. They are our future leaders, workers, decision makers! Again, like for counselors, I understand staff is hard to find. But we need to look more at why that is and not just eliminate the job. There are many studies and reports about the cause of the shortage of qualified

teachers in all subject and elective areas. We should be addressing those and not just pretending they don't exist or having them beat us. Why have things gotten to be in the situation they are? What has changed? Those need to be addressed.

These changes also unfairly negatively impact rural communities. We need to be providing more resources for these communities, not less. Kids should not be penalized for where they were born and having no choice over where they live. Whether that be rural vs urban or Montana vs another state.

We moved to Montana when our kids were in 8th and 6th grade. It was a difficult decision - the pull of family here was good, but we were concerned about the health and school systems here. We ultimately moved here, but had these policies been in place, we would not have. We would be depriving our kids of the education and support they deserve and need to be successful after high school. (We also travel out of state for healthcare. We do consider moving out of state again due to the backward changes going on.)

These policy changes are another state endorsed change that is not in line with the goal to draw people back to Montana. These changes just add to the list of reasons young and middle age workers with families, who would otherwise strongly contribute to our economy are not moving back. This is moving backwards and will not make our children competitive in the job market here, elsewhere around the US or world. This is not the way to make our children or the US competitive and remain a world leader.

Thank you for your time. Please do not approve the changes being presented.

Christine Roberts

Tristen,

I am writing to say I am AGAINST Superintendent Arntzen's recommendations for public education. Access to elective programs is CRITICAL. Access to school librarians and media services is CRITICAL. Access to school counseling staff is CRITICAL.

I am asking that you preserve specific electives and credit requirements for middle schoolers and that you maintain library and counseling ratios.

Our students deserve the best well rounded education that we can provide them with, removing these services threatens Montana students.

Maria Foot- Parent, NBCT, Montana Educator

To the Negotiated Rules Making Committee:

School libraries and librarians are essential. Some of my strongest memories from elementary school were reading programs in our library.

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,

Counselors and Library Media are extremely important....I am retired from school dist 5....I can not believe this is even a thought in anyones mind!!!!!!....KEEP LIBRARIES AN!!!! This is absolutely ridiculous

...Teri Beatty

To the members of the Negotiated Rulemaking Committee,

I am very 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. I encourage the Negotiated Rulemaking Committee to maintain librarian and counselor ratios. Our students deserve the best education possible, and these changes do not have students' best interests in mind.

Thank you for your time,

Alison Fischer

It came to my attention that there are some proposed changes to ARM 10.55 that I find troubling. I am writing to you as a parent and a taxpayer in the public school system. Here are a list of my concerns:

10.55.709 Library Media Services, K-12

This proposed amendment will do away with the ratios for full time licensed and endorsed library media specialists (Librarians) and also does away with where the library should be located within the school. I understand that times are changing and sometime in the future libraries may be obsolete with everything going digital, but I do not believe that time is here yet. To the best of my knowledge students are still using paper textbooks. My child looks forward to going to the library every Friday and checking out books. Reading is a very important skill that is in danger now with texting and social media and I think that it would be a detriment to our students to take that away from them.

10.55.710 Assignment of School Counseling Staff

This proposed amendment will due away with ratios for full time counselors for students in grades K-12. This is a horrible idea in my opinion. According to the CDC suicide rates in Montana per 100,000 people from 2014-2020 have constantly been in the top 3 in the nation.

2020- 3rd with 26.1 suicides per 100,000 people

2019- 3rd with 26.2 suicides per 100,000 people

2018- 2nd with 24.9 suicides per 100,000 people

2017- 1st with 28.9 suicides per 100,000 people

2016- 1st with 25.9 suicides per 100,000 people

2015- 3rd with 25.3 suicides per 100,000 people

2014- 1st with 23.9 suicides per 100,000 people

I could not find any concrete statistics on youth suicide rates but you would be hard pressed to find a community in the state that hasn't been affected by the suicide of a school aged child within the last few years. Also since 2019 with the disruption of COVID counseling is needed more than ever. Children are struggling to get back on track after a difficult few years and now you want to do away with their support? It is harder than ever to get childhood counseling right now and that is if the child's family has the means or care to do so.

Along with all of that from 2010 – 2019 there was a 115% increase in the number of minors in state foster care in the state of Montana. That is 16 out of 1,000 kids that are in need of some sort of support. According to MCA 20-3-105(10) it is the superintendent of public instructions duty to “faithfully work in all practical and possible ways for the welfare of the public schools of the state” I do not think that this proposal in any way does that.

10.55.905 Graduation Requirements

I would like to have some clarification as to what is intended by adding “or an equivalent that meets the district's curriculum and assessment requirements, which are aligned with the content standards stated in the education program”

10.55.902 Basic Education Program: Middle Grades

As best as I can tell this proposal wipes out all of the guidelines for middle school. I do not know why there were two middle school programs to choose from with the middle school philosophy and the departmentalized philosophy but my best guess is that it has to do with enrollment size. Also this proposed change does away with all of the required program areas and replaces it with “elective offerings” This is a vague term and does not lay out what elective offerings need to be offered.

I am assuming that these proposed cost cutting measures are due partially in reaction to the proposed CI-121 which would cap property taxes. I will not weigh in on that in this forum but if that does become law there needs to be another way to fund public education. The teachers in the state of Montana have been put through the ringer since before COVID started and it is not fair to them or the students to make these changes. I understand that hiring and retaining teachers is difficult in the state but that could be that due to the fact that housing costs and the cost of living are going through the roof. Please find a way to fund these important programs.

John Sorensen

Sorensen Plumbing & Heating

To the Negotiated Rules Making Committee:

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Yours sincerely,
Carlie Carman

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Yours sincerely,
Christine Bailey

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Yours sincerely,
Mette Fears

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Yours sincerely,
Kristen Neithercut

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Yours sincerely,
Jan Nicholson

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Yours sincerely,
Jane Highness

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Yours sincerely,
Brandon Prinzing

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Yours sincerely,
Sarah Cotterman

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Yours sincerely,
Cathy Billie

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Yours sincerely,
Ashley Stergar

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Yours sincerely,
Heather Hardester

To the Negotiated Rules Making Committee:

I'm writing to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians are crucial to students and help maintain excellence in education for each one. 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.

Thank you,

Jenn Prinzing

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Yours sincerely,
Mary Medley

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Yours sincerely,
Brittany Lingman

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Yours sincerely,
Julie Dannenberg

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,
Lena Romeo

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Yours sincerely,
Linda McLinden

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Yours sincerely,
Cal Dickman

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Yours sincerely,
Laurie Chipps

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Yours sincerely,
Lisa Sukut

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Yours sincerely,
Alexander Welander

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Yours sincerely,
Sara Bigelow

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Yours sincerely,
Abigail Lessels

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Yours sincerely,
Allison Cutuli

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Nicholas Maya

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Yours sincerely,
Bader Labidi-Moumna

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Yours sincerely,
Carolyn Coefield

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Yours sincerely,
Anjuli Ross

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Children having these opportunities to connect to literature is so important for their personal growth- it affects how they see the world and their ability to empathize. Classroom teachers shouldn't be expected to be everything...librarians are experts in their field and perform a role that teachers would not be able to fulfill as successfully on their own. Plus it's not just educating children, maintaining a library and staying up to date on all the new childrens literature is a lot of work.

Library days are magical for my kids. They go to a small rural school where they already don't have access to some of the things other schools have. By changing the ratio I am worried they will lose their library time.

Yours sincerely,
Amber Stewart

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Dena Kirschten

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MaryAnne Hansen

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Yours sincerely,
Morgan Ray

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Yours sincerely,
Bobbi Otte

To the Negotiated Rules Making Committee:

As a University Librarian, I know the impact that school librarians have on the success of college students.

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools.

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Yours sincerely,
Susan Lee

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Yours sincerely,
Brian Rossmann

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,
Carrie Nelson

To the Negotiated Rules Making Committee:

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Yours sincerely,
Sally Martin

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Yours sincerely,
Deborah Titus

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Yours sincerely,
Tracy Mann-reno

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Yours sincerely,
Lisa Brennan

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Yours sincerely,
Lynda Corn

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Yours sincerely,
Anna Gasner

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Yours sincerely,
Janet Tatz

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Yours sincerely,
Elena Flanagan

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Yours sincerely,
Marybeth Clark

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Yours sincerely,
Angus O'Keefe

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Yours sincerely,
Susan Murray

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Yours sincerely,
Brittany Mion

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Yours sincerely,
Kelly DiNapoli

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Yours sincerely,
Diego Bexar

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Yours sincerely,
Calli Miller

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Yours sincerely,
Erika Gustavsen

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Yours sincerely,
Rosa Tougas

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Yours sincerely,
Krista Steudel

Dear Tristan Loveridge,

We are writing to you with an urgent and important message about preserving the integrity of our school libraries in the state of Montana. As librarians on the Flathead Indian Reservation in Ronan School District #30, we see how critically important having a school librarian in each of our two elementary schools, our middle school, and our high school is for our students' academic and social-emotional development. All four of us are in support of keeping the library accreditation standards in place.

Our libraries provide a rich learning environment, rigorous Library Media classes, a space to explore and create "Makers Spaces" and a sanctuary for reflection, reading and academic work. They are the academic heart of our schools. As librarians we work to support our students academic needs, but also we serve as key collaborators and contributors to our colleagues' work in the classroom. We are able to connect them with resources and help weave in essential elements of IEFA into our curriculum. Our libraries and our librarians are ESSENTIAL to the success of our schools. Our school libraries are often the only option for kids to have interaction with books, especially in an elementary setting. The proposed changes to the accreditation process would completely destroy this key element of our public school system. Rural districts would not need to prioritize having a full-time librarian and could funnel their funds in other directions if their leadership didn't see the value in the school library program. We are asking you to please act to protect our school libraries and the ratio required for a school librarian.

School Libraries are the central learning hub of our public school system. They serve as a lever for increased literacy, rich and diverse learning experiences, rigorous research and playful engagement with ideas. Libraries play a central role in preparing students for college and life in the workforce. The research is clear: the presence of a strong school library program has a significantly positive impact on student achievement.

"Since 1992, a growing body of research known as the school library impact studies has consistently shown positive correlations between high-quality library programs and student achievement. Data from more than 34 statewide studies suggest that students tend to earn better standardized test scores in schools that have strong library programs. Further, when administrators, teachers, and librarians themselves rated the importance and frequency of various library practices associated with student learning, their ratings correlated with student test scores, further substantiating claims of libraries' benefits. 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 (Lance, 2018)."

Just this morning, a student who had never really read much before this school year, just checked out her 35th book from the high school library. Her experience of discovering a love of reading and learning has been life-changing for her and has opened up new possibilities for her life. Libraries are essential and professional Librarians play an integral role in the overall success of a school. Please help us protect the right all students in Montana have to a school library and to an excellent public education.

Sincerely,
Claire Hibbs-Cheff, M.Ed
Ronan High School Librarian

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.

Yours sincerely,

Aimee Colyer

I am very concerned about the idea of reducing or eliminating counseling and library staff, particularly during this time when we are seeing so many elevated social emotional needs from our students. I have been teaching in Montana for 13 years (currently in my 6th year at Washington Middle School in Missoula, previously taught 7 years at Chinook Jr. High and High School), and I am the parent of two children in the Missoula public schools. The social emotional needs of my students has been growing over time, and that has been accelerated by our COVID experience. Our Counselors are stretched too thin to meet the needs as it is. Our Librarians also play an important role in this area, as they are often able to make connections with students who don't connect easily in other areas of school life. Frankly, I am shocked that anyone would even consider proposing rule changes that could lead to a reduction in staff during a time when student needs are at an all-time high. I am exhausted even with the incredible support of our Counselors and Librarians. Please do not approve any rule changes that could lead to a reduction in school staff. This is not in the best interest of our students.

-Alec Arntzen

Washington Middle School

Missoula, Montana

To the Negotiated Rules Making Committee:

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Yours sincerely,

Alison Boone

I strongly urge our State Superintendent and the Negotiated Rules Making Committee to rethink her ideas of eliminating school librarians and counselors and/or changing the accreditation numbers required for these positions. In fact, the accreditation standards could be adjusted to give our students even MORE support, not less.

Our students need more support! Our students need more adults in their lives! Research shows that students who read more, learn more! Why would we ever remove the librarian who supports the love of reading? Why would we remove the support of guidance and counseling on our campuses in a time when they need them the most?

Please, do not allow these changes to occur. Thank you for your time!

Allison Nys

Good Morning,

I am writing to disagree with Superintendent Elsie Arntzen's recommendation to change school accreditation standards, specifically the elimination of school librarian and counselor ratios. I strongly disagree with this recommendation and believe it unfairly targets rural students, whom I serve. Thank you.

Alyssa Cliver

Dear Mr. Belnap,

I am a veteran middle school teacher in the Bozeman schools (BSD#7) and I am writing to express my opposition to the proposed changes to accreditation standards in our state. The proposed changes would *erase* the staffing/student ratio requirements in Montana public school libraries. Based on the proposal, it's plausible that one teacher-librarian could serve the entire Bozeman School District without affecting the district's accreditation. This would be a disaster. As an 8th Grade English Teacher, I cannot emphasize enough the value and depth our Teacher-Librarians bring to our classes. We rely on our librarians on a weekly basis to help teach and guide our students through so many crucial processes they need to be college and career ready. From planned lessons and curriculum to research support and book talks, author visits and writing support our students would be operating under a severe deficit without them.

These changes could bring the loss of endorsed, literacy experts in each school, lack of maintenance and availability of print and online resources, and the destruction of the collaborative research and reading lessons designed and delivered by teacher-librarians alongside teachers. We cannot allow this to happen.

Please do anything and everything you can to maintain the integrity of our schools' libraries.

Sincerely,
Ann Bernard

To whom it may concern,

As a middle school educator, I work with students every day who are looking for groups/friends/subject areas/activities that they can belong in. By belong, I mean find a sense of pride and appreciation among many of their peers.

For many of our students, sports and academic classes give them a sense of belonging. However, for many others, the only reason they come to school is to hang out in the library during lunch, create art or wood shop creations, and/or learn a new language. The cuts that you are proposing will not only affect our school offerings, but also student socio-emotional belonging.

Thank you for the consideration.

Anna Potter

I do not support Supt. Arntzen's recommendations to change School Library Media Services 10.55.709 or School Counseling Staff 10.55.710 to eliminate staffing ratios because the changes would be unfair to rural students.

Anne D. Schumacher

My name is Ashley Stern and I have been a teacher at Lakeside Elementary School for 22 years. I am appalled at Arntzen's recommendations regarding school librarians and counselors. School librarians are vital to promoting a love of reading. School counselors are more needed than ever. Counselors provide much needed support to all students, but especially those that are impacted by trauma and stress. Please feel free to contact me with any questions.

I am writing to state my objection to the change in rules for how librarians are assigned to school districts. I think the proposed change is as bad an idea as bad ideas get. It will greatly affect the students in our district in a negative way. Our current number of librarians are able to provide so many essential services and opportunities for our students that would not be available if the number of librarians were to be reduced.

Please do NOT reduce the number of librarians in our school! Librarians should be assigned to every school according to the numbers of students in the school, NOT assigned to the district at large. With gratitude,

Dr. Ceilon Aspensen, BFA Fine Arts, MA Native American Studies, PhD American Studies Full-time High School Art Teacher, Laurel High School, Laurel Montana Writer Professional Studio Artist

I am an exploratory teacher at Meadow Hill Middle School in Missoula and I am writing to strongly support keeping both School Library Media Services and all school Exploratory classes in schools! Library services are often the only access students have to books to increase their literacy skills and to grow their ability to research and access information. Taking the library and media services away would negatively impact all students! As an Exploratory Project Lead the Way teacher, I see first hand what the Project Lead the Way curriculum affords students and how wonderful it is for them to learn real word skills such as Engineering and Automation and Robotics! Students learn skills that lead them into internships and careers. My classes develop students' confidence and independence, learning how to solve problems with support.

Music is also an Exploratory class, and is essential to the learning, whole child development and enjoyment for students in school! The role of teachers and schools is to facilitate the all around development of students, and music is necessary for that development! Please do not vote to take away Library, or Exploratory classes like Project Lead the Way or Music in our schools! It would be a real tragedy for students' well being and quality of education!

Thank you for consideration,

Chloe Williams

I am writing to ask you to please maintain Librarian and Counselor ratios in public schools. Mental health is a serious problem in Montana and both of these professional positions address concerns among our most vulnerable, our children.

The library is where many children who just don't "fit in" go for solace and librarians are many times a source of solace and friendship. I know because I was one of those children who went to the librarian for comfort. Please do not diminish something that does work for our children. Thank you for your consideration in this matter.

Colette Campbell Belgrade MT

I am writing to express my concern regarding adjusting accreditation standards that would remove access to Library Media and Counseling staff in Montana schools.

Library teachers are essential to facilitate 21st century skills including typing, coding, research techniques and internet safety and protocol. Losing access to this at any age will negatively impact students' college/career training goals and job readiness skills. This cannot be a position that is left unaddressed as it will put students behind the standard of modern education which would have been achieved if they simply had been allowed the opportunity. Please do not remove access to Library Media teachers for Montana schools.

In a state with already limited access to mental health services and *especially* in a state with higher than average suicide rates--removing access to counseling staff in any way is harmful to Montana students. Not only do counselors assist students with mental health, they help guide students with career exploration and readiness, as well as connecting students and families with services associated with hunger, homelessness and DFS. Counselors are an essential part of any school. Protect our students and families and maintain do not remove access to Counselors in Montana schools.

Please maintain the current ratios for Library Media Teachers and Counselors in Montana.

Sincerely,

Denise Rauch

Libraries have existed for thousands of years and have marked the advancement of humanity through the millennia. Reading, literacy, and the advancement of knowledge have been fostered by these

repositories of media containing all human knowledge. Libraries have been an open source of information, ideas, and progress since the time before the Library in Alexandria, one of the Seven Ancient Wonders of the World. The idea that these places of knowledge would not be staffed with knowledgeable and encouraging people, trained to provide literacy support in both reading and writing and most importantly research, to those being introduced to this haven of knowledge we call a library is a mistake. In totalitarian states libraries have been feared and restricted because knowledge itself is feared by those who seek to withhold information or favor some types of information over other types. In these states, under totalitarian leadership, access to libraries is strictly controlled and its content is vetted to only approved media. In this country and in this state, we have flirted with these restrictions to knowledge and even engaged in some in the past. Let us not go down this road anymore. In superior schools' knowledge is embraced and celebrated, ideas are nurtured and built upon. Libraries are the center of superior schools and those that run them encourage and provide access to knowledge and ideas and create environments that are welcoming and cozy, that encourage people to stay awhile and connect to the world in all the ways that media can provide. We need librarians to support all teachers in schools who together support the children as they begin to reach out to the world of ideas, knowledge, and progress. Superior schools recognize that knowledge and advancement happen because we stand on the shoulders of those who come before us. Our ancestors have provided us with the tools and ideas now housed in libraries. We have access to them through these repositories of knowledge and ideas. It is not just technical knowledge though; but through fables, parables and stories that resonate human emotion and human life lived, allowing the reader to share in an experience and thus understand better those people whom we may never meet but who have a story to tell. We learn from these autobiographical or even fictional accounts of life what it means to be human, and we learn that we too have a story. Our story. One that is deeply personal and important to us and at the same time has common threads that run through all humanity. Please reconsider the consequences of not adequately staffing our school libraries.

Let us not go down the road of restricting knowledge when the road to progress is and has been an open road that has no limits to possibility. Thank you for allowing me my thoughts on this matter.

Doug Dellwo

In our large school of nearly 12,000 middle schoolers, our librarians provide endless amounts of support for both staff and students. They act as full-time tech support, headmasters of student enrichment activities such as the annual yearbook, and invaluable resources for research and media literacy. This is in addition to, of course, creating joy and excitement for students when it comes to reading, which is essential in cultivating intrinsic motivation to read and learn. If our librarians were to disappear, students would lack support, causing their learning and well-being to suffer. Eliminating libraries and librarians is not what's best for kids, and it would be an egregious mistake to think otherwise.

Mrs. Elizabeth McClure

Please consider keeping the current librarian and counselor ratios as they currently stand. Counselors are at an all time need! With mental health continuing to be an increasingly more serious

concern in the youth in our schools today, bigger schools just can't meet the needs of students. Do what is right for the students and please consider keeping the ratios as they are. Thank you,

I am writing to ask that you maintain the current School Library Media Services ratios that are currently in effect along with the School Counseling Staff ratios. As a teacher of special education, I see many students whose only access to books comes from the school library. Without a school librarian in each school in Montana, the state would be failing our students as the students would not have libraries with some of the recent releases as well as a person to guide and develop the love of reading even further than it was in the past. Students who read have higher test scores, so Montana Public Schools need librarians to help foster a love of reading in addition to the regular education teacher! School counselors are needed more now than ever before. The ratio of 400 students to 1 counselor is very high. If the committee eliminates this ratio even more students will fall between the crack than are happening already. Getting to know 400 kids for 1 person is almost impossible, which is what the state currently expects from counselors. I could not imagine that number being even higher! Please vote NO on Superintendent Arntzen's recommendations for both School Counselors ratios and School Library Media Services! Jennifer Arneson

The proposed changes to the media services for K-12 schools will have a vital impact on student education. If anyone thinks that the only thing teacher-librarians do is checkout and shelf books they have no idea the role of the teacher-librarian. Teacher-librarians teach critical thinking skills as well as teach students how to evaluate sources, which is critical especially in today's world that is full of misinformation. Teacher-librarians collaborate with classroom teachers and are often times the go-to building tech person. The proposed changes (see chart below) are ridiculous. If there are some schools that are having a hard time finding qualified teacher-librarians, the answer isn't to cut the position. Why should all schools suffer for a problem that affects a few? Please do not change the current accreditation standards – it is not in the best interest for students. I implore you to reconsider moving forward with these changes!

Junell Lawrence Willard/Big Sky Teacher-Librarian

The Superintendent of Public Instruction's recommended changes for ARM 10.55.709 in regards to our school libraries are distressing. I am very concerned with the changes from "district" to "system", all of Montana schools have "districts" not systems, not sure why this change needs to be made. It is very important to keep accreditation standards tied to librarians per student ratio. I encourage the Negotiated Rulemaking Committee to reject every one of those recommendations and vote to keep the quality standards currently in effect.

Karen Mayhall

I am the librarian of the Crow Agency Public School. I want to share my concerns about the changes to the ratio mandates. The counselor gives support to over 300 students in our K-5 building who often suffer through the effects of drug addiction, homelessness, hunger, sexual abuse, losses of family do to death or imprisonment, and more. They need him!

As for me, I started as a kindergarten teacher and at least 1/2 if not 3/4s of my students each year had never had a book read to them. They did not have books in the home. I have done what I can to rectify that and becoming the librarian was a big factor. Holding book fairs, getting grants (usually given to "school libraries" only), and shopping wisely for incentives has allowed me to give every student at least one book a month but the most important part of my job is loaning different books weekly to keep their reading interest up and satisfied. Please consider carefully the proposals Superintendent Arntzen is bringing forward, they will cost our students dearly.

Respectfully, Karla Clark CAPS Librarian

I am the parent of a small child and care deeply about the quality of public education in Montana. I also grew up going to rural schools. The recommendations by Superintendent Arntzen regarding school libraries and school counseling staff are unacceptable. They will harm rural students and schools. Please push back against these recommendations and the others that decrease the quality of public education that our Montana children will receive in the future. Thank you.

Kristin Harbuck

As someone who attended one of Montana's rural schools and experienced firsthand the immense importance of its library, I am writing today to ask you not to adopt the proposed rule change put forth by Supt. Arntzen. Libraries and librarians are as essential to schools as classrooms and teachers. If anything, Montana's students need more—not less—encouragement to read books, and for that they need access to books. Libraries and librarians are essential, especially for our rural communities and schools. Likewise, school counselors serve a critical role. Already they are over burdened; they should not have to take on the responsibility for more schools or additional students. Again, I respectfully urge you not to accept the change proposed by the Superintendent, who seems not to understand the detrimental effects such reductions in services would have on our schools and students.

Please let me know what the final decision is regarding these proposed rule changes.
Sincerely, Laura Ferguson Helena, MT

I have been a rural librarian for over 30 years. During this time I have seen many changes to librarianship. The biggest change has been the addition of technology. I strongly believe it is my job to make sure students know how to ethically use technology and how to critically analyze what they see daily on their electronic devices. If you pass Supt. Arntzen's recommendations to eliminate the ratio of students to librarians, it could potentially reduce our job to checking out books and technology. I would no longer have time to teach research and critical thinking, which are necessary skills entering the workforce. Please keep the staffing ratios for librarians. Sincerely, LeAnne Brandt Irle School Librarian

Glasgow, MT

I grew up in Butte, Montana at a time there were no school librarians in the elementary schools. There was a room with books and seldom were students allowed inside. We had a good public library with a Children's room, filled with all kinds of magical, enticing titles and staffed with a librarian. My family was fortunate to live within walking distance of the library, enabling us to go to the library whenever we wanted. Access to those materials opened up the world for me and made me a life long learner.

School librarians are an important partner in the education process. In this age of fake news, propaganda and faulty internet sources, librarians are critical in teaching students how to evaluate the accuracy of their information sources for bias, alternative facts and out right lies. Librarians are also important to lead students to be avid readers and life long learners. They are responsible for building a collection of materials to support and enhance the district's curriculum. There is data to support that students attending a school without a school librarian do not perform as well as those who have a librarian on staff. I feel, in light of the book challenges, the wholesale removal of books from libraries and book burnings, removal of school librarians is an attempt to stifle and control a student's access to information. I would truly hate to see Montana abandon the current standards and replace qualified, dedicated professionals with a clerk who checks out books.
Sincerely, Lynn Allison

All of us live in a chaotic democracy. To issue counseling or library reduction is unconscionable. A divided country which was further obliterated by lies and deception under the previous administration and our lack of skill to firmly address the Covid pandemic have done irreparable damage to our educational systems and the integrity of our democracy! It is time to firmly support our schools and not to interrupt the process with bias. We need to unite and respect the tremendous impact of knowledge. Give Humanity reason!

Mike Kosorok

I am writing to plead with you to disregard the proposed changes Ms. Arntzen is presenting for consideration. The thought of students losing access to experts in literacy and mental health services through this horrendous proposal to cut library service and counseling positions is political theater! Is she looking for attention? Is this about getting a name in the paper? It certainly has nothing to do with what is best for the students, families and educators of Montana! Libraries and librarians are the heart of elementary schools. Librarians work closely with classroom teachers in integrating content area curriculum into the classroom. Just the thought of losing access to this resource is simply frightening. Perhaps Ms. Arntzen has been out of the classroom too long, or never had the opportunity to teach in an environment of collaboration which is required of the teachers in this era. As for cutting counseling, this is just ridiculous. The number of students and families school counselors support is already too much! We should be adding to those positions, not even considering reducing such necessary access to mental health services. Please, advocate for the students, families and schools of Montana-so no to these proposals!

Thank you, Patricia Ritter

Our schools need a permanent librarian as stated in our accreditation standards. Librarians are important to our students education as they provide valuable technology skills along with research skills. If our students are to become college and career ready they must have the skills and tools that best meet these needs. Librarians also assist the classroom teachers by taking these tasks on as they are best equipped to instruct students and free the classroom teacher so they may focus on skills such as writing and deep reading. The last thing that needs to be cut is counseling services. This is really unthinkable. All we read about is the fragility of students dealing with the fall out from Covid and now Montana wants to cut services? That's foolish and for some dangerous. We need more counselors and did so before we had to deal with Covid. This shouldn't even be on the table. It shows that there is little connection with what Montana teachers, students, and families are facing. Hard to fathom our leader is considering gambling with the mental health of our children. Please make the right choice for our children, our schools and our families.

Sincerely, Sandra Fox, Educator Lewistown, Montana

I am writing to let you know as the grandparent of a rural high school student I oppose changes to School Library Media Services, 10.55.709 and School Counseling Staff, 10.55.710. Please do not pass any changes that will unfairly affect my grandson!

Sandy Swenson

Dear Ms. Loveridge, Ms. Lacey, and Ms. Quinlan:

I would like to take this time to comment on the recommended changes to the accreditation standards by Superintendent Arntzen. Thank you for your time in reading this comment and taking the thoughts of educators into consideration.

I am a former employee of the Office of Public Instruction (OPI), where I was proud to work for over ten years. During my time at the OPI, I worked in the health enhancement division, accreditation division, and assessment division. While serving as the Accreditation specialist for several years, I had the opportunity to present to the Board of Public Education, and I respect the work the Board does. They work diligently to ensure a quality education for Montana students. The proposed changes to Chapters 10.55.709 and 10.55.710 are shocking. These changes will allow school districts to go BACKWARDS rather than forward with student services. I am especially concerned about the proposed changes to 10.55.710 because I am a school counselor. These standards are definitely in need of change, but instead of eliminating the current counselor: student ratios, there needs to be a reduction to the ratio. The American School Counselor Association (ASCA) recommends a 250-to-1 ratio of students to school counselors, which is 150 students less than the Montana standard. This ratio has been recommended by ASCA since 1965; almost sixty years. It is PAST time to make this change to Chapter 10.55.710 Assignment of School Counseling Staff. An analysis of the role of school counselors determined that school counselors typically spent more than 55% of their time in counseling and group activities with students.

"Several studies have noted that smaller ratios support increases in standardized test performance ([Parzych et al., 2019 \[schoolcounselor.org\]](#)), attendance ([Carey et al., 2012 \[journals.sagepub.com\]](#)), GPA ([Goodman-Scott et al., 2018 \[doi.org\]](#)) and graduation rates ([Lapan & Gysbers, 2012](#))

journals.sagepub.com], as well as decreased disciplinary infractions ([Carrell & Carrell, 2006](#) schoolcounselor-ca.org; [Lapan et al., 2012](#) journals.sagepub.com). Additional studies have shown that lower ratios also increase the likelihood of students having conversations with school counselors regarding college-going and postsecondary plans ([Bryan et al., 2009](#) journals.sagepub.com; [Danos, 2017](#) cpb-us-w2.wpmucdn.com; [Engberg & Gilbert, 2014](#) link.springer.com; [Hurwitz & Howell, 2013](#) eric.ed.gov; [Woods & Domina, 2014](#) eric.ed.gov; [Lapan et al. 2019](#) schoolcounselor.org). Further, 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. “ <https://www.schoolcounselor.org/About-School-Counseling/School-Counselor-Roles-Ratios> schoolcounselor.org]

Student social and emotional needs have risen exponentially during the pandemic, yet Superintendent Arntzen is proposing changes that will allow school districts to eliminate counseling services for students. Counselor caseloads have increased dramatically, even as staff shortages have forced educators to take on new responsibilities. Overworked and underpaid, we often lack the necessary resources to address students' social and emotional needs, which will only get worse with the proposed changes. For all age groups, Montana has ranked in the top five for suicide rates in the nation, for the past thirty years. In Montana between 2011-20 the youth suicide (ages 11-17) rate is 11.9/100,000. This is more than double the national rate for the same age group (4.98). One reason that Montana has such a high rate of suicide is because there is a lack of behavioral health services in our state. The reduction of school counselors will only exacerbate this lack of services.

“Bullying. Stress. Anxiety. Addiction. Academic challenges. Kids today, especially teenagers, are dealing with different – and in some cases, more – pressures and challenges than any young generation previous. Research indicates that teenage depression is rising at alarming rates, with approximately 1 in 5 teens diagnosed as depressed, and teen suicide rates are about five times higher than they were 50 years ago.

While there are many causes for these increases, one fact cannot be ignored: Children and teens need help. For many of them, school counselors are a lifeline to the support and services that they need. The problem, though, is that there simply aren't enough counselors to go around, leaving most young people without the valuable lifeline that they need.” <https://www.theedadvocate.org/why-school-counselors-are-in-high-demand/> theedadvocate.org]

I implore you, Ms. Lacey and Ms. Quinlan, to reject Superintendent Arntzen's proposed changes to Chapters 10.55.709 and 10.55.710. Superintendent Arntzen is NOT putting Montana Students First with these proposed changes.

Urgently,

Karen Richem

School Counselor

Broadwater Elementary

The proposed Library Media Specialist changes are reminiscent of library staffing/ resource availability of the 60's and 70's when I was a student in Great Falls. This was especially frustrating to an avid reader in elementary school. Many classroom teachers have classroom libraries but they are limited in scope or have insufficient copies. READING and READING COMPREHENSION are fundamental to critical thinking skills and concept retention. Library Media Specialists are essential to the Educational Team and reducing the time they spend with students is akin to shortening one leg on a three-legged stool and trying to stand on it. I believe the educational cost will be more substantial than anticipated.

Diane Anderson

Members of the Negotiated Rule Making Committee,

It has come to my attention that you will be considering Superintendent Elsie Arntzen's recommendations to the school accreditations standards. As a middle school teacher CTE in a Montana Public School, I feel as though my experiences and opinions are extremely valuable to the decisions you will be making. I teach [Project Lead the Way \[pltw.org\]](http://pltw.org)

classes – *Computer Science for Innovators and Makers, Design and Modeling, Green Architecture and App Creators* – to 6th to 8th grade students. Looking over the recommendations I noticed the red lines through the following: Library Media Services, School Counselor Staff, Physical and Life Sciences and Electives (Art, Music, Career & Technology and World Languages). These changes would be catastrophic to Montana's Public Schools students! Especially, for middle school students that only come to school for their electives and through library have access to books that greatly influence their lives. Many of the students that excel in my classes are students with disabilities and need hands-on and project-based curriculum to feel a sense of belonging and success in our education system. We must support the whole student! They need books to connect to all curriculums in school and they need support staff such as Counselors to make it through our education system.

I whole heartedly and professionally disagree with cutting Library Media Services, School Counselor Staff, Physical and Life Sciences and Electives (Art, Music, Career & Technology and World Languages) and urge you to reflect on the negative impacts these recommendations would have in Montana's education system.

Sincerely,

Errin River

Dear Ms. Loveridge,

My sister, now retired, was a career media/librarian in the Jefferson County Public School system in Colorado. For decades, she had to wage campaigns (mostly successfully) on behalf of her high school kids' education. She observed at one point years ago, "The key to maintaining democracy is broad K-12 education. Our libraries and media centers do this." Enough said.

As far as counseling ratios, as a retired physician, acutely aware of the behavioral health struggles of our kids, the ratios are already too lean. More counselors, not fewer, are the real path toward strengthening America at home and in the world.

Please do not cut these important resources.

Thank You,

Frank Reed MD

Tristen,

Please take this email as my "public comment" in regards to the changes being proposed to the Montana School Library Media Services, 10.55.709 and School Counseling Staff, 10.55.710. I am not in favor of the current ratios being removed.

Thanks,

Josh Henigman

Superintendent LEED AP

Langlas & Associates, Inc.

Dear Sir or Madam:

I am writing to express my concern of Superintendent Arntzen's proposed changes to the requirements for School Library Media Services. I would like to encourage any committee member reviewing these proposals to reject Ms. Arntzen's recommendation. Her proposed changes eliminate the ratio of students to certified librarians. In doing so, it eliminates students' access to school librarians, and without a doubt, this change unfairly targets rural students. The data is undeniable that student achievement is directly tied to a student's access to a fully certified school librarian. Please don't negatively impact students from small school districts by making it easier for their districts to deny them access to on-site libraries and librarians.

Sincerely,

Kerrie More

Glacier High School Library

Glacier High School

To Whom It May Concern:

I am writing to emphasize that access to certified librarians and mental health professionals is important for Montana's public school students. Please do not implement Elsie Arntzen's recommendations on required staffing ratios for librarians and counselors in our schools. While this change may attempt to help with staffing concerns in rural schools, there is the very real possibility

that larger districts, like my own, will eliminate these very important positions in order to correct “budget issues.” Doing this would be detrimental to all Montana students, teachers, schools, and communities. To quote the National Association of School Psychologists, “Research demonstrates that students who receive social–emotional and mental and behavioral health support achieve better academically. School climate, classroom behavior, engagement in learning, and students’ sense of connectedness and well-being all improve as well. Mental health is not simply the absence of mental illness but also encompasses wellness promotion; social, emotional, and behavioral health; and the ability to cope with life’s challenges. Left unmet, mental health problems are linked to costly negative outcomes such as academic and behavior problems, dropping out, and delinquency. Mental and behavioral health problems not only affect students’ short-term classroom engagement, but also interfere with long-term development of positive relationships and work-related skills” ([NASP \[nasponline.org\]](https://nasponline.org)).

Additionally, I am also very concerned about the language in Elsie’s recommendations regarding eliminating electives in middle schools. Doing so would take away students’ access to creative media classes, art classes, career education classes, physical education classes, band and orchestra classes, and choir classes, as well as change the requirements for core classes. Many of our Montana students come from low-income families who cannot afford to provide these very important opportunities to their children. If we don’t offer these in school, these students may never be able to access them! Our students deserve to have these programs in their schools. Over twenty years of studies have shown that access to the arts and other creative outlets increases math and reading scores, which Elsie repeatedly says are the priorities of the Office of Public Instruction. In fact, the *Journal of Psychology of Aesthetics, Creativity, and the Arts* found that “students who were exposed to an arts elective in middle school ‘had significantly higher GPAs and math and reading scores, and decreased odds of school suspension, compared to students not exposed to the arts’” (“[Can Arts Education in School Improve Academic Performance? \[studyinternational.com\]](https://studyinternational.com)”).

Please, please reconsider these changes. I am speaking to you both as a Montana educator and the parent of a middle school student currently attending a Montana public school. The negative ramifications of such actions would be felt for years to come.

Brittany Parson-Sillstrop

Tristen,

I have spent over 20 years in public elementary education. I can tell you that the counselor and librarian ratio needs to stay where it is (or we need more of them, not less).

We are trying desperately to emerge from this deadly pandemic and the mental health of EVERYONE is suffering! The hopelessness that these children have faced and continue to face is written on their faces. If we don’t hire MORE counselors we are going to see more suicides and school shootings. We need to be proactive and not reactive. In the two decades that I have worked in the public school setting I have seen things get worse. Stripping funding for vital programs is not the way to solve the problem.

Librarians serve a vital purpose that many do not even realize. They not only manage & organize the books in the library but teach students how to navigate the internet safely. With predators lurking everywhere to lure our children we need these gatekeepers to help keep them safe. If you make our

librarians travel between two to three schools these lessons will probably be cut just because there will be no time for them, thus putting our students in danger.

My question for those that make these "rules" is "When is the last time you stepped inside a school and have seen what is going on daily?" & "When is the last time any one has actually asked or cared to ask the people who do the work that matters EVER day in our public schools what they could **use** or **need** to educate our most precious resource?" We need common sense in government. I ask that those who still have a little of that left do the right thing and keep the ratio the same. I also ask that you come and visit with us and we will gladly show you how difficult the days have become. Thank you for listening. If you have any questions don't hesitate to reach out.

Brenda Laramore

Secretary

To Whom This Does Concern:

The recommended changes to accreditation for Montana students will decimate the current standards. The term "or its equivalent" is so broad and ill-defined that it will create a sub-standard curriculum of "anything goes." Staffing changes need to be based per school and district, not a general sweeping of every school in Montana.

Librarians are IMPORTANT. Access to school counselors is VITAL. The audacity to even consider removing or reducing middle school student access to music, world languages, visual arts, career education, exploratory courses, etc. is offensive and damaging.

As a Montana middle and high school graduate, as well as the mother of three Montana middle and high school students, I can't even begin to comprehend the destruction these proposed changes would have on our adults of tomorrow. Even though past the age of 40 I still use skills and information that librarians, counselors, music teachers, world history teachers, band teachers, and other extremely important educators taught me. I can't imagine the education for my own children if they hadn't had access to the same.

The least this state can do in unprecedented times like these is to maintain or increase the librarian and counselor ratios.

Thank you,

Mrs. Melissa Ryan

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. Kids need libraries and librarians!

Yours sincerely,
Marne Bender

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,
Leslie Foley

To the Negotiated Rules Making Committee:

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Yours sincerely,
Margaret Latrielle

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,
dani Edwards

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Yours sincerely,
Amanda Powers

To the Negotiated Rules Making Committee:

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Yours sincerely,
Bonnie Young

To the Negotiated Rules Making Committee:

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Yours sincerely,
Diane Mickelson

I object to changing language regarding the ratio of librarians to students. Librarians provide an essential role within the school and with student achievement. Librarians teach media literacy, appropriate use of social media, provide cooperative learning opportunities, and promote reading for enjoyment.

Research has proven that schools with certified librarians perform better on student achievement measures. Librarians work cooperatively with classroom teachers to provide current reference material, to teach ethical research skills, and the appropriate use of technology. Many librarians are incorporating STEAM into their curriculum to build the necessary career readiness skills students will need to be successful in their future.

By decreasing the number of librarians, you would be decreasing the number of adults who have consistent contact with students each year students are in a specific building. Many librarians serve students for 4 or more years in a student's educational journey. This consistency provides a safe place for students to pursue their interests and the ability to build a strong personal connection.

I ask that you keep the current librarian ratio when reviewing the rule changes.

Teresa Makela

Good afternoon,

I just became aware of the changes that the Office of Public Education is proposing. After reading through them I implore you to slow down and look more closely at what you are offering up.

As a teacher, I see some huge red flags and have some first thoughts:

We should never cut anything in the arts or library. Just never. Those things are gifts for our kids and society as a whole.

Access to counseling in schools is everything for children whose families cannot or will not set them up with help. And every headline I see reiterates the fact that our kids' mental health has never been in more danger. That this is even on the table boggles the mind and puts the whole rest of the document on high alert for me.

I get budget concerns. Especially for the smaller districts. I grew up in a small town and attended a small school. There were 15 kids in my class. I understand the challenges those districts face. I always tell the story of having one foreign language offered to us as high schoolers. It was German, and it was because our English teacher had spent a year there in the Marines. Was it super quality German? Probably not. But he was a teacher there and they made it work. They got creative. He was a good teacher and I was very lucky to have learned a second language and traveled to Germany twice. Instead of making cuts let's look around and make things happen. Now with technology I can't imagine that we can't offer our kids more and not less.

We need quality trained teachers who are given FTE status for compensation and benefits. We need them to give our students a variety of classes that teach life skills and problem solving. If all our students leave with is the basics of reading and writing and math we will be a sad society indeed.

Please. Go back to the drawing table. Take the time and do the work you have been elected or delegated to do. Our kids and our community depend greatly on a strong education program and all I can see in the quick read through of these proposals is important things being whittled away. And

this last minute awareness feels like a back door deal and shady in all the ways. I expect better and our kids deserve better.

Thank you.
Respectfully,
Meredith Johnson

In Regards to the school accreditations standards proposed by Superintendent Elsie Arntzen I have the following comments:

I thinking limiting the FTE standards for librarians and counselors is a big mistake. It will leave many schools without adequate coverage for these crucial programs in our public schools. During a time of increased mental health problems for students it is not a time to be limiting services for counseling. Librarians also are crucial to the development of quality education. Librarians do far more than read books to students. They help develop unit studies in collaboration with classroom teachers and teach students critical research skills. In many communities Library classes also provide for Prep time for regular classroom teachers. How will adequate Prep time be covered if the FTE for librarians is cut ?

It also appears that the Superintendent is recommending cutting minimum science classes from Middle Schools. I can think of no rationale for that. She also recommended cutting language that provides for planning a middle school curriculum that meets the unique needs of students that age. All curriculum should meet the needs of the cognitive, physical, emotional and social needs of the students it serves. Cutting that language makes no sense – isn't meeting the needs of students the responsibility of education?

I also wonder why the new language limits meeting the distinct and unique culture heritage to that of Native American students only ? Although I feel that is important I think it would be more fair that curriculum meets the distinct and unique cultural heritage of students.

I also see a recommendation for eliminating the statement that students could graduate with less than 4 years. If a student is able to meet all the graduation requirements in a shorter amount of time why would we not allow that? Each students life experience and abilities is unique and the amount of time they need to meet those requirements is individual. Some may need more time and that also should be allowed.

One change that I am a fan of is adding the ½ credit of economic and financial education literacy to the highs school curriculum. I am glad to see that recommendation.

Sincerely,

Lanita C Barnhart M. Ed.

Retired Teacher

I am a k-1 library teacher serving a school of approx. 300 and I am overwhelmingly busy!!! Librarians have limitless demands on their time.

The children love the library and they love having access to books! I have each class for half an hour each week and work to allow better access for the children for book exchanges on their other days.

Colorado has done studies that show the significant positive impact of library programs on overall student achievement.

Librarians are also called in to keep track of technology equipment that is checked out to individual students in response to pandemic needs. This access to technology causes an incredible demand on librarians time!

This is not a time for education institutions to limit availability of trained professionals in the area of information access for our youth!

To allow a lower ratio between librarians and students would mean that students would not develop the ability to access and identify reliable information as is necessary for members of a democracy!

Dale Hannon, Cherry Valley Elementary, Polson

Hi there,

I'm an elementary school teacher in Missoula. I do not support Supt. Artzen's recommendation to cut library and mental health services in Montana's schools. These services and the qualified professionals that deliver them are vital to the health and well being of our schools, and ultimately, to our community.

Access to libraries and the librarians that make them a safe place to be helps ensure student access to high quality books and promotes a love of reading. Many students without books at home rely on these books and the care from the librarian to find the perfect book.

Without mental health and counseling in our schools, students health, well being, and education will be negatively impacted.

I do not support Supt. Artzen's recommendation and I urge you not to either.

Sincerely,
Olivia DeJohn

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.

Please pay attention to the numerous studies that show that students who have a full-time librarian in their schools perform better on their reading and writing scores than those who don't have one. This is more important than even with the decrease in reading and writing skills brought to us by overindulgence in social media.

Yours sincerely,
Janet Childress

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Yours sincerely,
Gretchen Murray

To the Negotiated Rules Making Committee:

Please do not agree to the proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. This system has worked to protect library services in small school districts (and a similar system is used by the state library for community services) for many decades. Why change something that isn't broken? There is no substitute for trained specialists, and school librarians are teachers who help maintain excellence in education for every student. The ratio system works and is staying with it is the wisest choice 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,
Beth Antonopulos

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Yours sincerely,
Paula Beswick

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Yours sincerely,
Jennifer Hossack

To the Negotiated Rules Making Committee and Board of Public Education:

I am writing today to vehemently 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.

I am the Children Services Librarian at Lewis & Clark Library in Helena, and I have two children in the Helena School District. I work with the Teacher-Librarians to engage and educate our community. Library services for children and teenagers extend far beyond storytimes and pleasure reading. Teacher-Librarians in our community provide necessary lessons on media literacy, research skills, technology, and they encourage students to find their path of lifelong learning.

While local control in education is a significant issue, school librarians are one position that if eliminated also eliminates a whole department. Valuable resources will be lost to our community and state if the ratios of school librarians are significantly diminished by the proposed change to Chapter 55.

Yours sincerely,
Molly Hudson

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,
Brianna Lipke

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Yours sincerely,
Dacia Vollin

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Yours sincerely,
Jackie Wood

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Yours sincerely,
Krystal Handford

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,
Bethany Schatzke

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Yours sincerely,
Crystal Thompson-Tower

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Yours sincerely,
Stacey Keffeler

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Yours sincerely,
Dylan Reed

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Bradford Herron

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Junell Lawrence

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Yours sincerely,
Erin Fuller

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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,
Shawn Schweyen

To the Negotiated Rules Making Committee:

I value school librarians. Do you? It truly takes a village to raise a child, and our school librarians are essential components to ensuring student success.

The current ratio of students to librarians has been in place and working for over 30 years. Why would we change a successful program? That seems both unnecessary, and unwise.

I strongly oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. Please do not let this proposed change be a backdoor cut to school libraries across the state.

Sincerely,
Elizabeth Fullerton

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,
Kim Rott

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Yours sincerely,

Dayel Dunning

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Yours sincerely,
Pierce Chandler

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Yours sincerely,
Heidi Gunderson

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Yours sincerely,
Brandy Thrasher O'Neill

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Yours sincerely,
aderley murphy

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Yours sincerely,
Emily Wilson

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Yours sincerely,
JAIME Long

To the Negotiated Rules Making Committee:

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The task force employed to review these documents spent hours researching, reviewing and discussing these issues coming up with recommended ratios. While the task forces recommendations may have left something to be desired, it is unconscionable and shameful that the state superintendent is disregarding them to promote her own political agenda.

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Yours sincerely,
Johanna Freivalds

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Lauren Dunlap

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Yours sincerely,
Kristi Laib

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Yours sincerely,

Toriw Wilson

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Yours sincerely,
STEF JOHNSON

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Kathleen Herman

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Christine Kombol

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Yours sincerely,
Shelley O'Rourke

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Yours sincerely,
Jamie Zier

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. As a lifelong user of libraries and now as a professional librarian, I can attest to the essential role school librarians play in the lives of students, both educationally and personally. Libraries are safe spaces to many, not to mention centers of knowledge for gaining valuable skills for later in life.

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Brenda Wilson

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Yours sincerely,
bev richardson

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Yours sincerely,
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Yours sincerely,
Lydia Perry

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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

I'm sending this comment to you as part of the Negotiated Rule Making Committee in regard to my concerns about proposed changes in the standards for Librarians and Counselors in our Montana Elementary Schools. I feel Superintendent Arntzen's recommendations threaten the availability of student access to these services especially in our smallest rural schools. The present standards were established to make these essential library and counseling services available to all students. The present standards allow for minimum levels of librarians and counselors as it is already in schools. The new recommendations would cut the number of professionally trained personnel in these two areas and put these services in jeopardy. There would be insufficient personnel to provide adequate services to all our children. I feel the present standards are at a level that is reasonable and workable in order to maintain the services necessary for our students. Please take a very close look at the proposed standards, as I feel they will be completely inadequate in trying to maintain quality services.

Thank you for your attention to my concerns and for your careful attention and consideration of all the new proposals.

Mary Boschert-Brannin.

Mental health is health. I am the director of an academic mental health program in Montana and also am about to be a new mom. The changes being proposed by Superintendent Arntzen are terrifying. We know that mental health issues are on the rise across the nation and especially in Montana where access to mental health resources, especially in rural communities is scarce, at best. To even consider proposals that will decrease these services to Montana kids by reducing school counseling staff, and library media resources (who are staff who know the students and are often the ones referring to school counselors) will be detrimental to our Montana youth and population as a whole. Suicide rates are some of the highest in the nation and these will not only rise but most likely have dire consequences. These proposals will disproportionately harm rural children in our state, many of which come from underrepresented backgrounds.

Access to school counselors and school librarians is integral to the success of our education system, our students, our teachers, our parents, and our community as a whole as students grow up to be contributing members of our Montana communities. I am hopeful these will not be passed and the

true dire nature of the consequences will be considered. Thank you for the opportunity to submit a comment on this matter.

Kayte Kaminski, Bozeman, MT

Please consider not changing the ratio of counseling and library. It is pretty hard for me to understand why that would even be a suggestion. I am wondering if you read the news that children are having a very difficult time right now and there are many suicides or suicide attempts. We need the counseling for those children and for the ones that are affected by that.

Pat Molloy

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

I recently learned of Elsie's proposal to cut ratios for counseling, library, visual arts, music and more. As a teacher with 16 years of experience in Montana schools, and a graduate of the system, and a mother of four children currently in the 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://schoolcounselor.org/Publications-Research/Research/Impact-of-School-Counseling>

[schoolcounselor.org]

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.

[Eric.Ed.gov/?id=ED482253](http://eric.ed.gov/?id=ED482253) [eric.ed.gov]

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://www.onlinecolleges.net/10-salient-studies-on-the-arts-in-education/> [onlinecolleges.net]

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.

Janelle Clark, Billings, MT

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

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. Our students should be given the opportunity to have access to a school library and librarian, for many students this is one of their main interactions with books. Our counselors are essential to support the mental health of our students. We are living in a time where more and more students are dealing with trauma, meaning we have more students who need to meet

with a counselor, this is not the time to take away that service. Please think about what is best for our students and say no to the recommendations in front of you. Thank you. Brianna Gleason

Please do not change the library accreditation standards for Montana. Libraries are an essential cornerstone of Montana children's education. Reading success is integral to student success and having an intentionally developed collection curated by certified teacher librarians is one of the most vital ways to engage students in literacy.

I have worked in the Bozeman School District for 10 years. Seven of those 10 years have been spent working in an elementary school library and a middle school library. While working as both a library paraprofessional at Meadowlark Elementary and as a library secretary at Chief Joseph Middle School in Bozeman, I have witnessed library lessons being taught to students from Kindergarten through 8th grade. In those lessons, teacher librarians present a special skill set in information literacy that cannot be replaced by certified teachers who do not have a library endorsement. The truest testimony to this is our middle school's fully booked library schedule where teachers in all areas of instruction (science, math, ELA, health enhancement, and art) sign up to have their classes instructed collaboratively with the teacher librarians.

Our middle school is fortunate to have a rich collection with 20,000 books. We have had students return to us years later to tell us how much they miss our library. These connections don't just happen. They are cultivated over years with time spent learning who the students are as readers and helping them find books that are "just right" for them. I have seen the joy on children's faces when they find a book that speaks to them and that is what motivates them to read. On site teacher librarians are essential to building, maintaining and understanding a collection that will support and motivate student engagement in literacy.

Please do not change the existing ratio of students to school librarians. This ratio is a vital part of Montana students' education and their lifelong success.

Sincerely, Aloha Johnson

I am asking that the ratios of the Library-Media Specialist and School Counselor positions at public K-12 schools in Montana remain the same. Cutting the funding to these positions would detrimental to our students at all levels. Many students and school staff members utilize our libraries, especially when the town/community in which

they live does not have a public library to access. This is the case in my community and school within which I am the school librarian.

I am also concerned about reducing the counselor to student ratios. We are seeing an increase in mental health crisis nation-wide. We need more counselors per student than ever before. COVID-19 did a number on the mental health of many adults, and we need to realize that the children of those adults are also living with the aftermath of those consequences. It's quite alarming to see the number of students that utilize the services of our school counselor, and we are considered a "small school" in the state of Montana.

Please take the time to review my concerns along with others about reducing these ratios; if anything, increase the ratios for the betterment of our youth.

Thank you, Michelle Gauthier

PLEASE keep the library and counseling ratios above the minimum.

Wendy White. Great Falls

Access to certified librarians and mental health professionals is vitally important for Montana's public school students. I wholeheartedly object to our state Superintendent moving to do away with required staffing ratios for librarians and counselors in our schools. This will lower education standards and quality for ALL of Montana's students. I also understand that our Health Enhancement, art, and music programs may also face the chopping block, and if this comes to fruition, Elsie's damage to Montana students will be irreparable.

Signed, Tonya Henry. Red Lodge, MT

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, Jenny Molloy

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Yours sincerely, Lorrie Juden

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Yours sincerely, Carolyn Buchta

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Yours sincerely, Marilyn Grainey

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Yours sincerely, Amanda Jackson

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Yours sincerely, Carrie Van Atten

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Yours sincerely, Brynn Molloy

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Yours sincerely, Jessica Lee

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Yours sincerely, Joy Yoakam

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Yours sincerely, Marie Pettit

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Yours sincerely, Lynette Lancon

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Yours sincerely, Vicki Nelson

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Yours sincerely, Shana Harrington

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Yours sincerely, Dr. Erica Zins

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. I am a certified library media specialist and the mother of two school age children. I believe passionately in my role as a librarian and the impact I have on kids. I am proud that Montana has been a leader with our librarian to student ratio and am disappointed that this measure is being considered.

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, Jessica Dufresne

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Yours sincerely, Richard Anderson

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proposed change to Chapter 55 be a backdoor cut to school libraries across the state. Our Librarians are the heart & soul of our schools, and the reason our kids learn to LOVE reading!

Yours sincerely, Cassie Betz

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Yours sincerely, Melissa Romano

I am writing today to express my opposition to the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. School librarians are absolutely essential for our students, schools and developing a love of literacy. Every school in Montana and every student in Montana deserves to have a school library with a full time librarian. Maintaining the ratio, if not improving it, is the wisest decision for our students. Please do not approve this proposed change to Chapter 55. It's consequences would be devastating for our students and their futures.

Sincerely, Christina Russell

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Yours sincerely, Tom Bogen

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Yours sincerely, Vicki Motley

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Yours sincerely, Jennifer Newbold

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Yours sincerely, Dawn M Perry

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Yours sincerely, Suzanne Streeter

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Yours sincerely, Lisa Jones

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Yours sincerely, April Davis

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Yours sincerely, Laura Trapp

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Yours sincerely, Amy Allen

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Yours sincerely, Marianne Adams

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Yours sincerely, Charlie Adams

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Yours sincerely, Justin Brunell

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Yours sincerely, Beth Cusick

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Yours sincerely, Ben Cordell

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Yours sincerely, Michelle Robinson

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Yours sincerely, Rachel Bright

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Yours sincerely, Susan Selvig

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Yours sincerely, Nina A Rice

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio of school librarians to students in Montana schools. I am also writing to oppose the proposed changes to school counseling ratios in our schools as well as graduation requirement changes.

I work as a teacher. I know what a devastating effect these changes will have on our students.

School librarians help maintain excellence in education for every student. EVERY STUDENT. Mental health issues are so much greater now than even 10 years ago.

Cutting mental health support only serves to harm our students. The proposed graduation requirement changes water down the education students need to not just survive in this changing world, but thrive.

Please, before making such devastating changes spend time in our schools and speaking with teachers. Make a sound decision that serves the students we have. Invest in our students- invest in the future. Do not rob them of the very tools they need.

Yours sincerely, Heather Williams

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Yours sincerely, Cheri Lambert

This is Steve York, a long-term Montana Educator and former Assistant Superintendent of Educational Services at the Office of Public Instruction. I would like to request a link for the committee meeting this afternoon. Whether possible or not please consider this email as public comment.

I have concerns about the Superintendent's recommended amendments to district accreditation standards in the professional areas of librarian and counseling. It is my understanding the recommendation to remove ratio requirements from the standards is being considered and such a move is not in the best interest of our schools and thus our students, our future.

Librarians are a necessary portal of information for students and staff. Information has expanded far beyond magazines and books. The amount of information available is remarkable and can be overwhelming when compared to what was available when I began my educational journey. It is also problematic. Today, librarians are much more than keepers of books. Guiding students in discerning accurate vs inaccurate, truthful vs untruthful, safe vs unsafe information is critical to our student's and society's wellbeing as well as the health of our democracy. We need, at a minimum, to maintain our librarian requirements.

Counseling also raises grave concerns. Mental health and career guidance are essential as our kids are demonstrating increasing mental health challenges and facing an ever changing and stressful world to live in as adults. The role counselors play is absolutely essential. They are often the support

system that allows children in need to stay in class and successfully learn as well as decreasing the disruption in the learning experience of other students. Weeks need more support from counselors, not less.

Once again, these two recommendations are not in the best interest of our kids, their families, communities and our state. Please reject the recommendations.

Thank you for your time. Steve York.

As a citizen of the state working in the Middle School in Polson Montana, I implore you to maintain the public-school library and counselor standards, as well as the graduation and basic educational program requirements designated under the Montana Administrative Rules. It is my opinion that the proposed changes are not written to guide local school boards in the adoption of policies which would ensure each student attending public school has access to the materials and services necessary to reach their highest human potential.

The library is a place in the school where comprehensive resources are stored in order to provide students the ability to become aware and informed about all areas of our universe. It is a place at school that allows individuals autonomy in their choice of study and provides students a safe place to learn basic life skills in property responsibility and human interaction. It should continue to be a prominent centerpiece in the school, with the staff necessary for it to be the foundation for all educational resources.

The School Counselors are essential to the social and emotional health of students and must be available at school and during school hours. Counselors support students with appropriate social etiquette and emotional regulation during their school day. They are also available to be a source of safety and protection to students facing adversity in their lives. Being present to observe and support students in their daily interaction at school is the most effective and efficient means to develop this aspect of positive personal growth of the children in our communities.

Amending the rules to create vague program and graduation requirements has the potential to create a population of uneducated citizens. It will also impact those individuals attempting to access higher education in a negative way; Colleges will not think highly of a diploma from a public school without defined standards that ensure a sound understanding of basic abilities in reading, writing and arithmetic.

Please do not adopt the amendments to Chapter 55 as proposed. The proposed changes remove specific language that attempts to provide a quality education by defining minimum standards. The removal of these standards makes the rules vague and ambiguous, which will result in a lack of access to a quality education for our youth and reduce the quality of life for all individuals in our state. Take the time to develop a thorough review process which will result in amendments that continue to provide our youth the best resources available to become a well-educated and high-quality individual of society. Thank you for your thoughtful consideration of my comments.

Susan Shannon.

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- a 4th grader and 2nd grader at Jefferson Elementary. I am also the Chair of Jefferson Parent Council.

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 sunseting, 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, Meghan T. Wirth.

I have been the Library Media Specialist at the Frenchtown School District for grades 6-12 since August of 2012. The proposed changes for School Library Media Services greatly concerns me. We are a small school, but we take great pride in the services we offer to our students and faculty.

In August of 2017, the administration had to adjust our library staff so that one of the three certified librarians in the district had to travel between two libraries. Because of this downsizing of constant staff, we have struggled to maintain our programs effectively. The library is a hub for students and teachers where they can not only find their favorite books, they can also expand their minds with creative thinking in our growing makerspace (STEM/STEAM) programs. If the proposed changes pass, our growing programs will suffer or even have to be eliminated.

During these challenging times, libraries are a constant for learning to occur in Montana schools. This includes hands-on activities, technology, book clubs, research and more. The proposed changes would hurt our library programs, therefore hurting our students. Please do not move forward with the proposed changes for the School Library Media Services. It will take away and eliminate some of our programs, which in turn hurts our students.

Sincerely, Ann Gentry. Frenchtown Library Media Specialist.

The proposal of changing the librarian and counselor / student ratio is not a good idea! This will have such a negative effect on students being able to access help. Librarians are a vital to students in their research, essay writings and in any computer work

Counselors are already dealing with inability of not being available because the demand is so great. These are troubling times and students need access to more assistance, not less! PLEASE do NOT minimize the importance of these two areas. That's not the way to support the education of our students.

Elly Driggers.

Please also encourage the Negotiated Rulemaking Committee to preserve specific electives and credit requirements for middle schools. We do not want students to lose access to courses due to these changes.

Thank you for your time, Alison Fischer.

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. East Helena, MT

I am writing to voice my opposition to the proposed changes to (1) remove the requirement for public elementary and middle schools to offer electives, including music; and (2) eliminating the required librarian/counselor to student ratio.

As to the first, music always played an integral role in my education and academic success. Today, I am an attorney at a well-regarded regional law firm. Some of my fondest memories from elementary school are from music class, from which I still have songs memorized. For many students --

especially students in rural areas and low income students -- the only opportunity to learn music is at public school. I urge you to maintain the requirement that public elementary and middle schools offer music and other arts electives to their students.

As to the ratio of librarians and counselors to students, eliminating this requirement will once again have a disparate impact in rural and low income students who do not have other options for accessing librarians and counselors. Librarians play a key role in teaching students how to navigate research, both in the physical library and on web-based research platforms. Access to counselors is especially important at this time, when we are seeing spikes in mental health issues among students as a result of the isolation and anxiety caused by the pandemic.

I cannot think of any good reason to eliminate any of the above requirements. Doing so will only harm our students -- especially those already at a disadvantage -- at a time when they are in great need of support as we return back to a semblance of normalcy. I urge you to support our students and maintain the status quo.

Thank you, Emily Cross.

I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor/Librarian to student ratios, as well as accreditation language for subject areas for grades 7 -9. The language in these standards protect these important programs for MT students and provide well rounded curriculum that assures that MT students get a balanced education.

As a retired school counselor (2020) 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.

In my former position as a primary school counselor, I served more than 400 students on a waiver. I was often called out of meetings, groups, and class lessons to address crisis response at my school. In 2019/2020 our district hired an additional counselor which significantly impacted our ability to meet student's needs.

We recently lost our comprehensive mental health teams that served our most challenging students due to state budget cuts. That makes counseling ratios more important than ever.

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 Maul-Smith. Corvallis, MT.

Please maintain the CURRENT librarian AND counselor ratios. I live in the Flathead Valley and we have seen our children and teens struggle hard core with mental health, with a string of suicides impacting our teens. These cuts would put our kids at more risk to suicide, poor school outcomes, and other adverse effects from not having access to counselors with reasonable caseloads. There is nothing good that will come from cutting the ratio of counselors and librarians.

Mallory Phillips, Whitefish.

I am a certified librarian and former high school English teacher. I am appalled to hear of your recommendation concerning librarians and counselors. Librarians are not an appendage to classroom teachers; they are an integral part of the learning process. They are indispensable to both teachers and students.

It has been shown, indisputably, that distance learning and school closings have harmed students learning by as much as 50%, and the isolation of students has increased suicides and student mental health at an alarming rate. Counselors are needed more now than ever before. With both of these factors in mind, there should be an effort to increase the numbers of both librarians and counselors, not reduce them. Before any educational decision is made on any topic, school personnel should be contacted and heard. I can guarantee that no one in a school setting could possibly agree with what you have proposed and would find it irreparably dangerous and harmful to the education and well-being of our students, which, after all, are in our care.

Judith Yockey.



Written Public Comment
Library Media Specialists Comments
Received May 19th

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,
Lori Rice
Montana, 59937, United States

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Yours sincerely,
Jennifer Robbins

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,
Tera Brunner
Montana, 59714, United States

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

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Yours sincerely,

Linda Lynch

Montana, 59602, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

Kalah Kingsbury

To the Negotiated Rules Making Committee:

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Kalah Kingsbury

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Yours sincerely,

Tiffany Bell

Montana, 59106, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

Cindy Wood

Montana, 59725, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Meagen Heenan
Montana, 59102, United States

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.

We need our librarians!!
Please reconsider these changes.
Yours sincerely,
Megan Stricker
Montana, 59106, United States

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,
Jamie Cline
Montana, 59803, United States

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Yours sincerely,
Michael Thomas
Montana, 59102, United States

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Yours sincerely,
Christine Stanton

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Yours sincerely,
Dwight Bergeron
United States

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Yours sincerely,
Ashley Henigman
Montana, 59718, United States

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Yours sincerely,
Helena Cassidy
Montana, 59923, United States

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Yours sincerely,
Meagan Schiffer
Montana, 59105, United States

To the Negotiated Rules Making Committee:

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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,

Joe Roberts

Montana, 59106, United States

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On a personal note, the private parochial school that my children attended has cut this very important resource and because of that we no longer support it financially nor do we recommend it to our friends with school age children. It is important that we give our children the best education to prepare them to be the best citizens that they can be as well as citizens that contribute to the welfare of society as a whole.

Yours sincerely,

Marjorie Doyle

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,

Alicia Rogers

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Yours sincerely,

Suzie O'Connell

Montana, 59725, United States

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Yours sincerely,

Hunter Howe
Montana, 59101, United States

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Yours sincerely,

Kerry Cassidy

Montana, 59808, United States

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Yours sincerely,

Misty Larsen

Montana, 59102, United States

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Yours sincerely,

Michelle Gorecki

Montana, 59501, United States

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Yours sincerely,

Teresa McNearney

Montana, 59602, United States

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Yours sincerely,

Kayla Wells

Montana, 59911, United States

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Yours sincerely,

Elaine Mencas

Montana, 59718, United States

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Yours sincerely,

Samantha Mize-Honatke

United States

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Arwyn Welander

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Yours sincerely,
Lona Carter
Montana, 59601, United States

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Yours sincerely,
Jennifer Erickson
Montana, 59714, United States

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Yours sincerely,
Janelle Zauha
Montana, 59715, United States

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Yours sincerely,
Christina Harper
Montana, 59601, United States

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Yours sincerely,
Rob Green
Montana, 59802, United States

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Yours sincerely,
Tera Almendinger
Montana, 59602, United States

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Yours sincerely,
Kari Dahle-Huff

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Yours sincerely,
Kurt Wahl
Montana, 59405, United States

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Rana Rasmussen
Montana, 59105, United States

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Gwen McKenna
Montana, 59804, United States

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Yours sincerely,

Tracie Mccrossin
Montana, 59829, United States

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Kasi Hepola
Montana, 59701, United States

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Yours sincerely,

Stephenie Ambrose Tubbs
Montana, 59601, United States

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Yours sincerely,
Lorene Bishop
Montana, 59901, United States

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Yours sincerely,
Jack Saunders
Montana, 59714, United States

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Yours sincerely,
Tierney Greenwalt
Montana, 59102, United States

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Yours sincerely,
Marna Pickard
Montana, 59912, United States

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Yours sincerely,
Monnyca Kramer

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JW Robinson
Montana, 59803, United States

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Yours sincerely,
Megan Skolrud
Montana, 59602, United States

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 and counselors to students in Montana schools.

Elise, let's trade jobs for a week. You have NO CLUE what is happening in schools across MT. Students aren't numbers, they are human beings.

Stop "helping" schools!!!

Let's trade jobs for a week
Yours sincerely,
Erica Mercurio

To the Negotiated Rules Making Committee:

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Yours sincerely,
Leslie Clark
Montana, 59759, United States

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Yours sincerely,

Jim Majerus

Montana, 59106, United States

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Karen Preble

Montana, 59101, United States

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Yours sincerely,

Loren Meyer

Montana, 59801, United States

To the Negotiated Rules Making Committee:

I am writing today to encourage you to maintain the number of school librarians working in our state. Librarians in schools are essential for helping our students achieve to the highest levels. Please oppose this change to Chapter 55.

Yours sincerely,

Deidre McMullin

To the Negotiated Rules Making Committee:

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Yours sincerely,

Madison Parrott

Montana, 59718, United States

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,

Tanya Brand

Montana, 59803, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

Robin Wood

To the Negotiated Rules Making Committee:

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Yours sincerely,

Susn Davis

To the Negotiated Rules Making Committee:

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I am now retired, but in my career as a librarian I can say that I worked with almost every student in the Bozeman High School. The duties and activities of a librarian are varied from reader's advisory, to using technology safely, to properly researching topics. I also enjoyed the connection of the students who found a home in the library, whether an advanced student or a special needs student who needed a safe place, and a one-on-one connection. Librarians are vital to today's students.

Thank you for your time, Rita Kroon

To the Negotiated Rules Making Committee:

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Yours sincerely,
Leah Cornish
Montana, 59718, United States

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Yours sincerely,
Lynn Trenary
Montana, 59602, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Kaity Colby
Montana, 59106, United States

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Yours sincerely,
Kristin Robinson
Montana, 59601, United States

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Yours sincerely,
Beth Campbell

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Yours sincerely,
Michael Alberts

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Yours sincerely,
Erin Pelger
Montana, 59802, United States

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Yours sincerely,
Tara Ferriter-Smith
Montana, 59602, United States

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Yours sincerely,
Erik Berscheid
Montana, 59105, United States

To the Negotiated Rules Making Committee:

libraries across the state.

Libraries are the backbone of creative thinking and the discipline of intelligent questioning in our schools.

Please to not cut the ratio of librarians to students

Liz Gundersen

Montana, 59601, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

Danielle Whittmeyer

To the Negotiated Rules Making Committee:

This course of action will have consequences that will be immediate and devastating. I teach English in a rural school. We have a fulltime counselor and 2 other private counselors with full case loads. No doubt our students' lives are at stake.

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Yours sincerely,

Hali Kirby

Montana, 59030, United States

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Additionally, proposed changes to revised teacher and resource staff-to-student ratios will not only further strain our already overworked school employees, but will reduce essential support systems for our students. Our kids need counselors, librarians, and a robust and diverse variety of course offerings including art and music.

Furthermore, the proposal by Ms. Artzen are id direct contradiction to the School Quality Task Force Recommendations.

Our students, families, community, and future workforce will suffer if these short-sighted, unvetted proposals are approved.

Sincerely,

Laura Rennick

>>Helena School District Graduate

To the Negotiated Rules Making Committee:

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Yours sincerely,

Emily McNeilly

Montana, 59601, United States

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Yours sincerely,

Michelle Fenger

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Yours sincerely,

Laci Szillat

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Yours sincerely,

Emily McNeilly

Montana, 59601, United States

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Yours sincerely,
Katie Hanson

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Yours sincerely,
Katy Nelson
Montana, 59602, United States

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Yours sincerely,
Annie Rice
Montana, 59106, United States

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Yours sincerely,
caroline myhre
Montana, 59824, United States

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Yours sincerely,
AJ Gondeiro
Montana, 59602, United States

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Yours sincerely,
Lindsey Kuntz

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Yours sincerely,
Leslie Kennedy

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Yours sincerely,
Dennis Peterson
Montana, 59601, United States

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Cassidy Brooks
Montana, 59801, United States

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The average Superintendent in Montana makes over \$150,000/year. That's 3 times the average teacher or librarian and 3 times the average salary in the state of Montana. Superintendents are billed as the CEOs of Schools and deal expressly with Budgets, along with the State OPI. Do not reduce students direct access to knowledge and educators because Administration failed in one of their primary jobs of managing the Budget of Schools.

If there are budget issues own it, reduce the pay of the people who failed to manage the budget. Montana is forecasting a Budget Surplus for the year. Work with the State Treasury and State Executive staff to work this problem out. Don't make students lose access to educators for lack of adults managing budgets.

Yours sincerely,
Chuck Gondeiro

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Yours sincerely,
Elsa Ouvrard-Prettol
California, 95626, United States

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Yours sincerely,
Katie Keehr
Montana, 59715, United States

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Yours sincerely,
Hannah Morigeau

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Joseph Anderson
Montana, 59803, United States

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Yours sincerely,
Andi Michalson
Montana, 59602, United States

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Yours sincerely,
Lucy Dayton
Montana, 59601, United States

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Yours sincerely,
Josie Muri
Montana, 59937, United States

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Yours sincerely,
Lisa Pavlock
Montana, 59865, United States

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Yours sincerely,

Chelsey Croskey

Montana, 59715, United States

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Yours sincerely,

Rita Collins

Montana, 59917, United States

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Yours sincerely,

Kaia Rosen, MLIS

Montana, 59602, United States

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Yours sincerely,

Kailey Mayo

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Yours sincerely,
Molly Newrones
Montana, 59102, United States

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Additionally, I oppose removing certain specific requirements and language for middle school. Quite simply, school districts do not pay for what they aren't required to have. Music teachers, foreign language teachers, librarians, counselors....all are vital to the growth and development of well-rounded citizens. Yes, all of these certifications are in short supply. But instead of addressing that supply by reducing the requirements, maybe we should address the factors in our culture that make education an unappealing profession to get into or stay in.

Thank you for your time and consideration.

Yours sincerely,
Lindsey Wilkerson

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Yours sincerely,
Susan Mephram
Montana, 59422, United States

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Mike Webb

Montana, 59718, United States

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Yours sincerely,

Liz Stotts

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Yours sincerely,

Courtney Blossom

New York, 10312, United States

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Yours sincerely,

Jane Leuthold

Montana, 59102, United States

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Yours sincerely,

Benjamin Spencer

Montana, 59804, United States

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Yours sincerely,

Alison Gappmayer

Montana, 59718, United States

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,

Britin Cross

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,

Amy Driggs

Montana, 59917, United States

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,

Thomas Neujahr

Montana, 59101, United States

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. I served as a school librarian many years ago. The world, our information systems, our ways of communicating with each other have changed dramatically since then and I cannot imagine a worse time to diminish the requirements for the critical services school librarians provide.

While this is the primary focus of my communication today, I would be remiss if I didn't mention that the rest of these rule changes strike me as equally alarming. How can we justify reducing the standards for counselors as we emerge from this disruptive pandemic, fully aware of the negative impact these past few years have wrought on our children? Why, for some of the same reasons, would we look to music, arts, career education, world cultures and languages as a defensible change to required options as our 21st Century realities are increasingly demanding?

Please put a stop to this array of inexcusable assaults on the integrity and effectiveness of public education in Montana.

Yours sincerely,

Lisa Cordingley

Montana, 59601, United States

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,

Ashleigh Heichelbech

Montana, 59404, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

Jennifer Dousset

To the Negotiated Rules Making Committee:

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Yours sincerely,

Rachael Waller

Montana, 59102, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Amy Gondeiro

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Yours sincerely,
Lindsey Anderson
Montana, 59715, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Mary Demro
Montana, 59715, United States

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Yours sincerely,
Angela Johnson
Montana, 59718, United States

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Yours sincerely,
Jay Anderson

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Yours sincerely,
CJ Janssen
Montana, 59715, United States

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Yours sincerely,
Kodi Hoffmann
Montana, 59262, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
DJ Turvey
Montana, 59901, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,
Victoria Edelman

To the Negotiated Rules Making Committee:

I recently learned of Elsie's proposal to cut ratios for counseling, library, visual arts, music and more. As a teacher with 16 years of experience in Montana schools, and a graduate of the system, and a mother of four children currently in the 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!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_R3dIFMM\\$](https://urldefense.com/v3/https://schoolcounselor.org/Publications-Research/Research/Impact-of-School-Counseling_!!GaaboA!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_R3dIFMM$)

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!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_B5Xqtvw\\$](https://urldefense.com/v3/http://Eric.Ed.gov/?id=ED482253_!!GaaboA!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_B5Xqtvw$)

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!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_d1NpfuU\\$](https://urldefense.com/v3/https://www.onlinecolleges.net/10-salient-studies-on-the-arts-in-education/_!!GaaboA!uMo4uGOIxKjluH2oZMQgXhIGdSARkahKJYgPmiYz1shFu3xuUcv mcMeSWHCzOVZ0EgNqtdUGBnnJs5_d1NpfuU$)

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.

Yours sincerely,

Janelle Clark

Montana, 59102, United States

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,

Debra McNeill

Montana, 59715, United States

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Yours sincerely,

Kaetlyn Cordingley

Montana, 59801, United States

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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.

I have witnessed firsthand with my own children in a small, rural, Montana school just how important a constant school librarian is. Our librarian has made an incredible impact on our school in just her first year at Alberton School. Our students absolutely cannot lose her presence.

Yours sincerely,

Jen Fredette

Montana, 59820, United States

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,

Mallory Johnston

Montana, 59102, United States

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Yours sincerely,

Hannah Ohman

Montana, 59714, United States

To the Negotiated Rules Making Committee:

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Yours sincerely,

GLEN KORF

Montana, 59106, United States

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,
Sherry Leone
Montana, 59601, United States

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Yours sincerely,
Molly Schmidt
Montana, 59602, United States

To the Negotiated Rules Making Committee:

I am writing today to oppose the Superintendent's proposed changes to the Chapter 55 ratio. Please do not let this proposed change to Chapter 55 be a backdoor cut to school libraries across the state.

Yours sincerely,
Julie Schopp
Montana, 59105, United States

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,
Peggy Smith
Montana, 59102, United States

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.

I am currently working as a librarian in Montana. I work hard to provide a wide range of instruction to our students and assist in the cultivation of a love for reading and learning.

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,
Wendy Norwood

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Yours sincerely,
Krystal Steinmetz Steinmetz
Montana, 59501, United States

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Yours sincerely,
Chloe Ellis
Massachusetts, 01854, United States

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Yours sincerely,
Jessica Hartman

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On a personal note, the librarian has been an integral part of my son getting additional instruction to help him excel. Every child deserves a librarian at their individual school.

Yours sincerely,
Megan Schultz
Montana, 59801, United States

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Yours sincerely,
Amber Tucker

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Yours sincerely,
Melissa Wilson
Montana, 59044, United States

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Yours sincerely,
Julie Betts
Montana, 59069, United States

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 and Counselors to students in Montana schools. The wording of proposal is a scapegoat move to give more "local" school district power. This sounds like a great thing, but in honesty we all know that if districts don't have to maintain ratios of students to teachers they will cut these programs to save money. Then when it gets back to the state the state won't have to take responsibility anymore since it's now a district policy.

I'm not sure what Elzie's intention is writing these proposed changes. As a Superintendent her job should be to try to provide the best education for each child. Counselors and Librarians are essential in the schools. Mental health needs are higher than ever. Librarians give students access to a variety of learning materials and both professions teach students how to be safe in the world and online. Those are only a few duties that Librarians and Counselors cover.

I strongly encourage whomever gets a vote on this proposal to vote against any word change and keep Libraries and Counseling at a decent student/teacher ratio.

Thank you for this consideration,

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,

kammi pilati

Montana, 59801, United States

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Yours sincerely,

Mary Swan

Montana, 59105, United States

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Yours sincerely,

Tracie Shepherd

Montana, 59602, United States

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Yours sincerely,

Sheryl Huntley

Montana, 59802, United States

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Yours sincerely,
Conor Fox

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Elsie has been gutting the Office of Public Instruction and valuable, knowledgeable and dedicated staff have left the department in droves. It has been difficult to watch Montana public education come under attack from within from it's top leader.

Rather than properly funding teachers and schools, Elsie and the legislature continue to make cuts and move toward privatizing education for their own benefit.

Yours sincerely,
Daisy Carlsmith

To the Negotiated Rules Making Committee:

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Yours sincerely,
Katie Howells
Montana, 59105, United States

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Yours sincerely,
Mark Welander

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Yours sincerely,
Shelley Pelc
Montana, 59901, United States

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Yours sincerely,
Lynn Bubb
Montana, 59601, United States

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Yours sincerely,
Kerry Williams
Montana, 59715, United States

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.

As a retired Montana public school librarian (36 years in three different districts), I am horrified to see the proposed "standard", which is no standard at all. No contracted librarian can offer the services children need, or the curriculum support teachers have come to expect. Your school librarian is an integral part of any staff, serving individual staff members and building a library collection around the needs and interests of the curriculum and even individual students. This is a bad idea on every level.

Yours sincerely,
Janet Kransky

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April Fife

Montana, 59601, United States

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Yours sincerely,

Caitlyn Lewis

Montana, 59801, United States

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Counselors are in greater need than ever before due to the increased financial, social and emotional stresses that challenge every Montana family.

Yours sincerely,

Cori Well

Montana, 59601, United States

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Yours sincerely,
Sarah Winkler
Montana, 59840, United States

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Jamie Humphrey
Montana, 59106, United States

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Joey Roberts
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Sandy Wunderlich
Montana, 59602, United States

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Allison Kindsfather
Montana, 59106, United States

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Phyllis Lefohn
Montana, 59634, United States

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Cindy West
Montana, 59718, United States

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Montana, 59601, United States

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Yours sincerely,
Lori Villa
Texas, 78410, United States

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Montana, 59937, United States

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Yours sincerely,
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Montana, 59870, United States

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Yours sincerely,
Leona Roberts
Montana, 59106, United States

K-12 Library Media Services:

Comment:

I would like to go on record stating that I don't agree with the recommendation of cutting the library media specialist services to a "contract as needed" status. Doing this would leave the teachers and students woefully underserved, especially when they are already strained.

Assignment of School Counseling Staff

I would like to go on record stating that I am opposed to the proposed changes. We are in the midst of a crisis of mental health concerns and suicide among youth in our state, and it would be disastrous to gut the school counseling services.

Respectfully submitted
Holly Thrash
Helena, MT 59601

I have read the superintendents proposed changes to chapter 55, specifically the changes to 10.55.709 and 10.55.710 and I am opposed to both of these changes.

I oppose the 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.

In addition, I oppose the change to the ratio for school counselors. This is a time when our youth need more counselors, and the rule change would reduce that availability.

Please do not pass these rule changes.

Sincerely,
Candee Krantz
Helena MT 59601

The library is the heart of a school. It is such a vital part of building a community and expanding the education of children. Please do not lower the standards for accreditation.

Deborah Stebbins
Montana Voter

Dear Sirs and Madams,

Reducing Library Services in schools is akin to asking children to eat only once a week. Reducing library services will absolutely starve students and staff of vital resources that not only further inform instruction but

provide a lifeline to students across the board. Underprivileged, gifted and talented, middle of the road students and everyone in between is given an opportunity to pursue individual interests and read for pleasure. Your attempts to reduce Library-Media Specialists will have devastating consequences for our next generation.

Please take a stand and do WHAT IS RIGHT. It matters little what is happening on the larger political spectrum if we refuse to serve our very own.

Empathically,

Barb Muller

To whom it may concern,

I have taught music for over 25 years in three states. I am adamantly opposed to changes in library accreditation for Montana. I am also adamantly opposed to reducing music education. Library and music enrich students' lives and educate students in more ways than are measurable.

The proposal to change these programs reflects an ignorance in current Montana state leadership. Reducing funding for library and music will drive even more teachers to leave the profession. Teachers are at their limits and will leave Montana for states that support teachers, library, and music.

I am sincerely disappointed in Montana leadership for considering this proposal. As a long time music teacher who now works in Bozeman, please take my advice and do not accept such changes.

Thanks for your consideration.

Margie Phillips

Chief Joseph Middle School Choirs

I have recently become aware of a negotiated rulemaking meeting on May 18th regarding changes to statewide requirements for libraries in Montana's public schools. I am a second grade teacher at Rossiter School, in Helena, Montana. I work collaboratively with our school librarian throughout the year. Through these collaboration efforts, my students gain experiences and knowledge beyond what they would in the classroom alone. I am concerned about the proposed changes for school librarians in Montana. School libraries and certified librarians are an especially important part of schools and these reductions seem extreme, especially for larger schools. Librarians teach students crucial information literacy skills such as learning how to determine the validity of information and how to safely navigate online resources through digital citizenship. School libraries provide access to information, which for some students is the only way they can access the information they need to complete their assignments. As my students move on through their educational career, library skills will become even more important. I am also studying library science. In these studies I have come across numerous articles stating that student achievement rates are higher when schools have a certified library. Our mission as educators is to give our students the best possible education and having school libraries run by certified librarians is one way we can do this. The ratio of librarians per student has been in place and working for over 30 years. A reduced number of librarians per student will negatively affect our librarian's ability to collaborate with educators and to maintain collections that are up to date and relevant, which in the end is a huge disservice to our students. Continuing to use the current ratios is the wisest option for our students and school communities. Sincerely, Andrea Tucker Helena, MT
Educator

This is written in protest for the changes suggested by Superintendent of Public Instruction, Elsie Arntzen. Libraries are central to critical thinking and developing love of information. The proposal disenfranchises our many rural schools in Montana. Additionally, changing the requirements for counselors in schools is not only unrealistic, but belies the problems faced by students after this unprecedented pandemic. How much was lost in online for students with no access to online? The social problems presented by homeless students and their families are leading to unprecedented challenges for students' education. Do not allow these changes to go

forth. I taught for twenty-five years in secondary education and believe strongly in the power of the Superintendent of Public Instruction, but this must not be a unilateral decision. Sincerely, Colleen Hansen

I am writing to express my concern for the ratio cuts of School Library Services and access to libraries for students. With the cut of ratios this would allow schools to cut librarians that help support students and staff in the schools. They encourage reading, troubleshoot technology, support all curricular areas and teachers. Without librarians and access to libraries students will suffer. I encourage the board to vote against Superintendent Elise Arnten's recommendations. Many of the recommendations within her proposals will affect schools in a negative way. Please rethink the recommendations. Thank you Aarica Phillips

I am a retired library media specialist from Montana. Before moving to Montana I also worked in Texas and Ohio. Montana has one of the best school library programs in the nation because it requires professional librarians in nearly all schools. In this age of information students need expert guidance in navigating and evaluating all sources. The proposed new staffing levels basically do away with all professional book and information selection and teaching. The proposal is radical in the extreme. How much input on the proposal has come from parents, students, teachers and community members? I urge you to leave in place the current staffing requirements that have served Montana so well.

School librarians are important to our elementary and secondary school students. Please don't tamper with reducing the number of librarians available to students by changing the existing ratio. The Covid Epidemic has already caused students' reading skill level to test well below acceptable standards. Substandard reading skills will diminish educational and vocational opportunities for these substandard readers throughout their lives. Please do not exacerbate this existing problem by reducing the number of librarians available to our students in this extraordinary time throughout our educational systems. Thank you in advance for your assistance!

The proposed changes set forth by Ms. Artzen would irrevocably harm Montana students. Rural schools will be massively impacted by these changes and NOT in a positive manner. Making library services and the arts more difficult to offer to students will stifle many who depend on those particular classes as creative and emotional outlets. We want to encourage creativity and independent thought. That is what access to books and the arts accomplishes. I certainly hope I am wrong in assuming the motivation behind these changes. Because it seems as if Ms. Artzen wants to dumb down our society by blinding and gagging our students, making available to Montana students educational opportunities only SHE deems worthy and important in a glaringly partisan manner. These changes are dangerous and SHOULD NOT be approved. Meredith McDonald
Philipsburg, MT

Librarians

This is Steve York, a long-term Montana Educator and former Assistant Superintendent of Educational Services at the Office of Public Instruction. I would like to request a link for the committee meeting this afternoon. Whether possible or not please consider this email as public comment. I have concerns about the Superintendent's recommended amendments to district accreditation standards in the professional areas of librarian and counseling. It is my understanding the recommendation to remove ratio requirements from the standards is being considered and such a move is not in the best interest of our schools and thus our students, our future. Librarians are a necessary portal of information for students and staff. Information has expanded far beyond magazines and books. The amount of information available is remarkable and can be overwhelming when compared to what was available when I began my educational journey. It is also problematic. Today, librarians are much more than keepers of books. Guiding students in discerning accurate vs inaccurate, truthful vs untruthful, safe vs unsafe information is critical to our student's and society's wellbeing as well as the health of our democracy. We need, at a minimum, to maintain our librarian requirements. Counseling also raises grave concerns. Mental health and career guidance are essential as our kids are demonstrating increasing mental health challenges and facing an ever changing and stressful world to live in as adults. The role counselors play is absolutely essential. They are often the support system that allows children in need to stay

in class and successfully learn as well as decreasing the disruption in the learning experience of other students. Weeks need more support from counselors, not less.

Once again, these two recommendations are not in the best interest of our kids, their families, communities and our state. Please reject the recommendations. Thank you for your time. Steve York. As a citizen of the state working in the Middle School in Polson Montana, I implore you to maintain the public-school library and counselor standards, as well as the graduation and basic educational program requirements designated under the Montana Administrative Rules. It is my opinion that the proposed changes are not written to guide local school boards in the adoption of policies which would ensure each student attending public school has access to the materials and services necessary to reach their highest human potential.

The library is a place in the school where comprehensive resources are stored in order to provide students the ability to become aware and informed about all areas of our universe. It is a place at school that allows individuals autonomy in their choice of study and provides students a safe place to learn basic life skills in property responsibility and human interaction. It should continue to be a prominent centerpiece in the school, with the staff necessary for it to be the foundation for all educational resources. The School Counselors are essential to the social and emotional health of students and must be available at school and during school hours. Counselors support students with appropriate social etiquette and emotional regulation during their school day. They are also available to be a source of safety and protection to students facing adversity in their lives. Being present to observe and support students in their daily interaction at school is the most effective and efficient means to develop this aspect of positive personal growth of the children in our communities.

Amending the rules to create vague program and graduation requirements has the potential to create a population of uneducated citizens. It will also impact those individuals attempting to access higher education in a negative way; Colleges will not think highly of a diploma from a public school without defined standards that ensure a sound understanding of basic abilities in reading, writing and arithmetic. Please do not adopt the amendments to Chapter 55 as proposed. The proposed changes remove specific language that attempts to provide a quality education by defining minimum standards. The removal of these standards makes the rules vague and ambiguous, which will result in a lack of access to a quality education for our youth and reduce the quality of life for all individuals in our state. Take the time to develop a thorough review process which will result in amendments that continue to provide our youth the best resources available to become a well-educated and high-quality individual of society. Thank you for your thoughtful consideration of my comments.

Susan Shannon. 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- a 4th grader and 2nd grader at Jefferson Elementary. I am also the Chair of Jefferson Parent Council. 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 sunseting, 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, Meghan T. Wirth. I have been the Library Media Specialist at the Frenchtown School District for grades 6-12 since August of 2012. The proposed changes for School Library Media Services greatly concerns me. We are a small school, but we take great pride in the services we offer to our students and faculty. In August of 2017, the administration had to adjust our library staff so that one of the three certified librarians in the district had to travel between two libraries. Because of this downsizing of constant staff, we have struggled to maintain our programs effectively. The library is a hub for students and

teachers where they can not only find their favorite books, they can also expand their minds with creative thinking in our growing makerspace (STEM/STEAM) programs. If the proposed changes pass, our growing programs will suffer or even have to be eliminated. During these challenging times, libraries are a constant for learning to occur in Montana schools. This includes hands-on activities, technology, book clubs, research and more. The proposed changes would hurt our library programs, therefore hurting our students. Please do not move forward with the proposed changes for the School Library Media Services. It will take away and eliminate some of our programs, which in turn hurts our students. Sincerely, Ann Gentry. Frenchtown Library Media Specialist.

The proposal of changing the librarian and counselor / student ratio is not a good idea! This will have such a negative effect on students being able to access help. Librarians are a vital to students in their research, essay writings and in any computer work Counselors are already dealing with inability of not being available because the demand is so great. These are troubling times and students need access to more assistance, not less! PLEASE do NOT minimize the importance of these two areas. That's not the way to support the education of our students. Elly Driggers. Please also encourage the Negotiated Rulemaking Committee to preserve specific electives and credit requirements for middle schools. We do not want students to lose access to courses due to these changes. Thank you for your time, Alison Fischer. 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. East Helena, MT I am writing to voice my opposition to the proposed changes to (1) remove the requirement for public elementary and middle schools to offer electives, including music; and (2) eliminating the required librarian/counselor to student ratio.

As to the first, music always played an integral role in my education and academic success. Today, I am an attorney at a well-regarded regional law firm. Some of my fondest memories from elementary school are from music class, from which I still have songs memorized. For many students -- especially students in rural areas and low income students -- the only opportunity to learn music is at public school. I urge you to maintain the requirement that public elementary and middle schools offer music and other arts electives to their students. As to the ratio of librarians and counselors to students, eliminating this requirement will once again have a disparate impact in rural and low income students who do not have other options for accessing librarians and counselors. Librarians play a key role in teaching students how to navigate research, both in the physical library and on web-based research platforms. Access to counselors is especially important at this time, when we are seeing spikes in mental health issues among students as a result of the isolation and anxiety caused by the pandemic. I cannot think of any good reason to eliminate any of the above requirements. Doing so will only harm our students -- especially those already at a disadvantage -- at a time when they are in great need of support as we return back to a semblance of normalcy. I urge you to support our students and maintain the status quo. Thank you, Emily Cross. I am writing this letter in opposition to Superintendent Arntzen's recommendation to eliminate the School Counselor/Librarian to student ratios, as well as accreditation language for subject areas for grades 7 -9. The language in these standards protect these important programs for MT students and provide well rounded curriculum that assures that MT students get a balanced education. As a retired school counselor (2020) 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. In my former position as a primary school counselor, I served more than 400 students on a waiver. I was often called out of meetings, groups, and class lessons to address crisis response at my school. In 2019/2020 our district hired an additional counselor which significantly impacted our ability to meet student's needs. We recently lost our comprehensive mental health

teams that served our most challenging students due to state budget cuts. That makes counseling ratios more important than ever.

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 Maul-Smith. Corvallis, MT. Please maintain the CURRENT librarian AND counselor ratios. I live in the Flathead Valley and we have seen our children and teens struggle hard core with mental health, with a string of suicides impacting our teens. These cuts would put our kids at more risk to suicide, poor school outcomes, and other adverse effects from not having access to counselors with reasonable caseloads. There is nothing good that will come from cutting the ratio of counselors and librarians. Mallory Phillips, Whitefish. I am a certified librarian and former high school English teacher. I am appalled to hear of your recommendation concerning librarians and counselors. Librarians are not an appendage to classroom teachers; they are an integral part of the learning process. They are indispensable to both teachers and students. It has been shown, indisputably, that distance learning and school closings have harmed students learning by as much as 50%, and the isolation of students has increased suicides and student mental health at an alarming rate. Counselors are needed more now than ever before. With both of these factors in mind, there should be an effort to increase the numbers of both librarians and counselors, not reduce them. Before any educational decision is made on any topic, school personnel should be contacted and heard. I can guarantee that no one in a school setting could possibly agree with what you have proposed and would find it irreparably dangerous and harmful to the education and well-being of our students, which, after all, are in our care. Judith Yockey.

Hi Tristen,

I'd like to submit a public comment for the Board of Education Meeting today.

Montana's schools need libraries and librarians. Not only do our librarians teach important skills like media literacy, effective research methods, and citations, but they also work hard at matching students with engaging literature. Oftentimes, reluctant readers become interested in reading because of the recommendations given to them by librarians. Libraries and librarians are also important resources for other classrooms and provide extension and supplemental materials for all subjects.

Likewise, media literacy is incredibly important. Now more than ever, students need to know how to sift through the mountain of information that is available on the internet and how to identify high quality, factual sources. Media literacy helps students learn to think critically, recognize a point of view, and become a smart consumer of media in all of its forms. These are skills that are imperative to an intelligent and democratic citizenry.

By removing libraries and librarians from our schools, we are doing a disservice to our students. Please keep our librarians and libraries in our schools- for our teachers, for our students, and for our future.

Thank you,
Caitlin Webb

Dear members of the Negotiated Rulemaking Committee Members,

My name is Rachel Schillreff. I was a teacher and teacher librarian for eight years. I have two school age children who attend the same public school system I attended and I am resident of Billings, MT.

I am asking for you to not support Superintendent Arntzen's recommendations.

As someone who works closely with rural teachers and advocates on their behalf, I understand the hardships that schools are facing in finding qualified specialists to fill those positions. Asking our students to do more with less is not the solution. Eliminating the requirement for a well rounded education just places the burden on families and students to fill in those gaps. We know that our families do not look the same as they did years

ago. Most parents work, some more than one job, and our students are busier than ever with extra-curriculars and supporting their households through jobs.

If schools will no longer be providing library services from a licensed qualified teacher- someone who can teach them how to decipher fact from fiction and research well- no one else will.

If schools will no longer be offering counseling services at a decent counselor to student ratio then there is little hope that Montana will lose its infamous suicide rate badge of honor.

Eliminating music, art, and world languages will not make our students competitive in the workforce or at the collegiate level. It may also make them less empathetic and more isolated from outside cultures.

Please do not pass this burden on to our students. It is one that they will not be able to carry.

Sincerely,
Rachel Schillreff

Dear Ms. Belknap,

As a parent and teacher I feel compelled to write you with my concerns. I am saddened, and frankly quite scared, at the overwhelming changes Superintendent Arntzen wishes to implement. I understand there may be some districts that need specific changes that pertain to their needs but the proposed changes will affect all schools and most importantly all students regardless of needs and this seems completely inappropriate and unnecessary.

I am vehemently opposed to these overreaching and sweeping changes that will lead to creating unsafe staff to student ratios for our counselors and librarians. Librarians are not simply individuals who check books out to our students. They are media experts who help further our students' interest, curiosity and learning in areas of technology. In our district alone our librarians take on the task of creating enriching STEM activities for the students as well as Gifted and Talented students. It is appalling to me that Superintendent Arntzen and other members would think it is a good idea to deprive our students of these crucial learning opportunities. Classroom teachers are already overwhelmed with all that needs to be accomplished in the classroom and our librarians help provide additional teaching time to enhance the learning of ALL students. In regards to reducing the amount of counselors in a district, I am nearly at a loss for words. Our students have been put through so much as it is these past few years with the pandemic. Now, more than ever, we need to support the social and emotional health of our kids. Very little academic learning can occur if our kids are struggling with their mental health. These students are not only dealing with the stress of their own feelings but perhaps that of the adults in their lives as well. Our kids NEED people they can talk with and make sense of what is going on around them.

Finally, the changes to the curriculum choices will undoubtedly weaken the high standards we are trying to set for all students to achieve. Teachers work tirelessly to plan, prepare and implement lessons that adhere to created standards and include ALL student levels and interests. By limiting what our students can choose and learn from is doing them a great disservice.

I implore you and all those we trust to make these important decisions, to please reconsider.

Respectfully,
Adrienne Simonson

To the Negotiated Rulemaking 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.

Additionally, proposed changes to revised teacher and resource staff-to-student ratios will not only further strain our already overworked school employees, but will reduce essential support systems for our students. Our kids need counselors, librarians, and a robust and diverse variety of course offerings including art and music.

Furthermore, the proposals by Ms. Artzen are in direct contradiction to the School Quality Task Force Recommendations.

Our students, families, community, and future workforce will suffer if these short-sighted, unvetted proposals are approved.

Sincerely,

Laura Rennick

>>Helena School District Graduate

>>Helena School District Parent

Dear Committee Members,

I have two daughters that attend schools in Billings School District 2 and I am writing today to ask you to please support students and staff by maintaining the current student ratio required for librarians and counselors. If anything these ratios need to decrease to fewer students per librarian and counselor. It is shocking that this is even being considered when we have record high number of students dealing with mental health problems and suicide ideation.

Do the right thing and keep ratios at their current rate.

Sincerely,

Kiely Lammers

Billings, MT

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 students deserve 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 of 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.

The children of this state have had enough difficulty getting support and education during the last few years without having that support drastically scaled back. One in five montana students has considered suicide. The proposed changes would only serve to make that statistic worse.

Greetings -

I have had the opportunity to review Superintendent Arntzen's recommendations for changes to Chapter 55. In summary, I find the recommendations for library media services, school counseling services, and the middle school basic education programming short-sighted and very concerning.

It is my understanding those changes are driven by recruitment and retention challenges in rural Montana. The solution to water-down or eliminate requirements for tough to recruit areas is the wrong solution. What if the response to challenges associated with healthcare recruitment and retention in rural Montana were to just get rid of rural healthcare? At a time when we are experiencing unprecedented challenges with student mental health, very clearly articulated in the Montana Youth Risk Behavior Survey Summary Report, the watering down of counseling standards is beyond alarming and simply reckless.

Recruitment and retention issues are best addressed head on by looking at salaries and benefits, affordable housing, higher-ed pipeline, childcare costs, and other specific barriers that school districts face in Montana as they try to recruit and retain a high-quality educational staff. Watering down the public school system and the education afforded to all children moves us in the wrong direction, and is contrary to the Constitutional mandate via Article X, Section 1.

It is also my understanding that the recommendations brought forward by Superintendent Arntzen look very different from the recommendations from the Chapter 55 Task Force, which was tasked with providing the Superintendent recommendations. That is concerning and I strongly urge the committee to look at both the recommendations from the Superintendent and the recommendations from the Chapter 55 Task Force.

I am in support of the graduation requirement change to include economics or financial literacy for all students. That seems like a meaningful step that will support students and the economy in the future.

Thanks for the opportunity to provide public comment.

Casey Bertram, Superintendent
Bozeman Public Schools

Tristen,

I would like these comments to be entered into the record of public comment for today's agenda item removing all minimum requirements for school counselors, librarians, and middle school electives.

I oppose removing these minimum requirements because children need these services and will be negatively impacted by low staffing levels in counselling and libraries. Students also need access to electives to have choice in their education and outlets for creative interests. Tell Superintendent Arntzen that her efforts to gut our educational system are not welcome.

Thank you,
John Halverson

Dear Ms. Loveridge,

I am writing you today as a former school counselor and an active Montanan. The suggestion that we cut the ratio of students : librarians and counselors is a terrible one.

Getting attention and support from librarians and counselors, people highly trained and skilled in their work is often critical in the lives of students. Eliminating this standard of 1:400 will have a strong negative impact on many students.

I have worked with students for decades and know that often people in those two roles have a unique point of access to children in need of extra support or extra stimulation and guidance. So often it is the school librarian who picks up on a student's interest and helps them pursue it . Or it's a school counselor who is able to connect with a student in a way entirely different from a classroom teacher, and help the student in ways a teacher often cannot.

These professionals are an important part of a healthy school ecosystem. Rather than eliminating the ratio, as Arntzen suggests, I would suggest making it one Librarian and / or Counselor to 200 students. That's the direction our school should be going.

Thank you for listening.

Sincerely

Nancy Seldin, EDD.

Dear Ms. Loveridge,

I am writing you today as a former school counselor and an active Montanan. The suggestion that we cut the ratio of students : librarians and counselors is a terrible one.

Getting attention and support from librarians and counselors, people highly trained and skilled in their work is often critical in the lives of students. Eliminating this standard of 1:400 will have a strong negative impact on many students.

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These professionals are an important part of a healthy school ecosystem. Rather than eliminating the ratio, as Arntzen suggests, I would suggest making it one Librarian and / or Counselor to 200 students. That's the direction our school should be going.

Thank you for listening.

Sincerely

Nancy Seldin, EDD.

Hello,

I am contacting you to voice my opposition to the Superintendent's proposed changes to the ratio of school librarians to students in Montana schools.

Over and over, the research has shown how essential certified school librarians are to the success of our students and our schools.

- More than 34 statewide studies show a positive correlation between state certified school librarians and student achievement.
- Students who attend a school with a full-time certified school librarian tend to earn higher test scores.
- Strong school libraries have been linked to graduation rates and student mastery of standards.
- The benefits are strongest for low-income students, students with disabilities, and students of color.
- School libraries can bridge the gap of inequity by providing access to technology and databases as well as print resources. Instruction, guidance, and assistance in the use of these resources also helps bridge that gap.

You can read much more at the following article from Phi Delta Kappan:

<https://kappanonline.org/lance-kachel-school-librarians-matter-years-research/> [kappanonline.org]

Please do not take this step backwards. Please support our students with a strong education by keeping the current student/certified librarian ratio intact.

Sincerely,

Laura Trapp

Current School Librarian at Lewis and Clark County Schools

Retired School Librarian with Helena School District 1

Hello,

I heard about the proposed changes to the School Library Services and the School Counseling Staff. I would like to request that these changes not be made. It is more important than ever that our students have access to a school counselor. And I cannot imagine where I would have been without the help of our library staff when I was in school. I would appreciate seeing the rules left as they are so that our students have the support they need in their schools. If a change were to be made, I would recommend more staff.

Thank you,

Nancye Rahn

Butte, MT

Tristen Loveridge,

I am writing in support of current accreditation standards for School Libraries and Counseling Staff.

I teach in a small school in the west of Montana and both the Library and Counseling services are vital to small towns and their schools.

The elimination of school libraries will create a hardship for our students in accessing library services. The same is true for the counseling staff. For many small towns the only mental health professional present is the school counselor. Eliminating those requirements will again impose a hardship upon families and students to seek out services outside of their community.

Please keep the current accreditation standards for both school libraries and counseling staff.

Thank you.

Dear Negotiated Rule Making Committee,

I am the library media assistant at Hellgate High School in Missoula. Daily, I see the importance—for students and staff—of having access to a centralized library staffed by certified teacher—librarians. A three-hour snapshot: we assisted with electronics and devices including headphones, printers, Chromebooks, desktop computers and digital cameras; we hosted Human Geography students, providing tools they needed to complete a project; and we had a steady stream of students borrowing equipment and books.

I witness the importance of counselors for students and staff as well. In that same three-hour window, I observed three counselor interactions: one counselor was giving a student and parent a tour, another connected with a student in the library, and another collaborated with our teacher- librarians.

Please preserve the current language and guidelines to maintain Montana students' access to centralized libraries with staffing ratios based on student enrollment. Please, too, preserve the current language and staffing ratio for school counselors. Eliminating either or both would be detrimental to not only our students and our communities, but also to our state.

Thank you for your consideration.

Sincerely,
Karen Buley

I urge the members of the Rule Making Committee to not adopt changes recommended by Arntzen regarding library staff and school counselors. These proposed changes will harm students and will be detrimental to Montana's rural districts.

Thank you
Rebecca Noell
MT PTA Treasurer

To those helping to make public schools accessible to all,
I was made aware of the proposal to dismantle the library media specialist by Superintendent Artzen. It is my understanding that a panel of knowledgeable individuals was created to adjust the library media specialist. This team put a lot of time, thought and consideration into the recommendations for the new standards that will be in place for the next eight years. Ms. Artzen then redlined, or redacted, all FTE parameters, leaving one media specialist to be state funded for each district.

If Montana is supposed to make gains on the national level how do we simultaneously say that early reading intervention is important and we are not going to support the hub in every school dedicated to reading. Librarians are more than just people checking out books to students! The support teachers in finding supplemental reading materials for lessons within the classroom. They provide literacy education themselves. They are in charge of school wide technology most often. They are able to help struggling readers and advanced leaders alike to find materials of interest.

Libraries and librarians often provide a safe, calm environment for students who are overwhelmed by the hustle and bustle of the school's social life.
Removing librarians in this magnitude would have long lasting detrimental repercussions that Ms. Artzen could not even imagen.

I urge you to disregard her redline remarks and continue with the recommendation of the panel.

Thank you for your consideration,
Concerned parent

Removing requirements for middle school electives would be a detriment to students' education. People are diverse; our minds are diverse. Each person's brain has its strength. Some people excel in Math and Science. Other students excel in languages, literature, fine arts, technology, shop, or sports. The world needs people in all vocations, requiring training to develop related skills. Many electives tap into the skills of the creative mind. To predetermine what is "important," and disallow students the opportunity to learn, develop, and demonstrate skills that are potential strengths would be devastating. Students thrive in different areas of education. Some would not remain at school if the opportunity to develop the aforementioned skills was not offered. Similarly, a

student who excels in Math might not remain engaged at school if only music and painting were offered. I work with a number of students who are challenged by traditional academia, but are gifted and flourishing in elective classes. They are a source of success and self-esteem for many, which can facilitate development and strengthen skills in other academic areas. The educational experience should be a source to maintain the overall well-being of our students. Please retain the credit and elective requirements for students in middle school.

Sincerely,
Kathleen Walker

Hello! My name is Kerry Zahn. I am the librarian at Alberton School, a 150 student PK-12 grade school located in Alberton, MT. We are a title one school and the library provides access to books that students might not otherwise have. Alberton is a small community that cares deeply for its school.

There are numerous studies that show the importance of libraries. Schools with strong library programs produce students with better standardized test scores in reading, stronger information literacy skills and higher graduation rates.

Studies also show us that school library programs are most effective when certified library media specialists work hand in hand with teachers.

Here are what some of my students have to say about the importance of school libraries:

Sofiea (2nd grade) said that the library exists so that “we can learn to ... read books that are on our level. If we read books we could probably become a librarian.”

Gracelynn (2nd grade) said, “I think schools should have libraries because it helps you read.”

Alyssa (12 grade) said, “Having constant access to a school library and a comfortable atmosphere has always helped me delve more into things I was/wanted to be passionate about. I think that limiting this kind of stuff would be really unfortunate for many students.”

Libraries are important...

- The library provides services for a large number of students at Alberton School.
- The library provides a place for students to study, relax, and connect with a caring adult.
- The library provides books that allow students to grow their minds and think critically.

I would ask that the board keep the current staffing ratios.

I oppose the changes to ARM 10.55.709.

Thanks for your time and work on this matter.

Kerry Zahn

Please maintain librarian and counselor ratios in our public schools.
