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BY THE Chapter 55 Negotiated Rule Making Committee – INFORMATIONAL ONLY

ECONOMIC IMPACT STATEMENT REPORT ARM 10, CHAPTER 55: STANDARDS OF ACCREDITATION

Prepared by the Office of Public Instruction July 2022



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Montana Office of Public Instruction
Economic Impact Statement for ARM 10.55 Accreditation Standards

Executive Summary

Using the negotiated rulemaking process, Superintendent of Public Instruction, Elsie Arntzen, has developed recommendations for comprehensive accreditation standard changes for ARM 10, Chapter 55, Standards of Accreditation. Every ten years, a more comprehensive overview of these standards occurs. Since 2013 much has happened, including a global pandemic that has required school districts to rethink how educational services are provided to students.

The work began after authorization by the Board of Public Education (BPE) and a timeline for reviewing the accreditation standards. Superintendent Arntzen directed a multi-year amendment process to better ensure Montana's school accreditation standards provide learner outcomes focused on education excellence. The outcome would ensure Montana students had access to a quality educational program that would develop their full educational potential and preserve the cultural heritages of American Indians.

The accreditation standards identified for amendments, [§20-7-101, MCA](#) may only be adopted by the BPE upon the recommendation of the Superintendent.

The ARM 10, Chapter 55, Standards of Accreditation, Negotiated Rulemaking Committee (NRC) to-date, identified twelve rules which were to be added to the two distributed surveys. The final report will include all the NRC's recommendations.

The first economic impact survey was released on June 20, 2022, and closed on July 5, 2022, with 652 responses. The second economic impact statement was released on July 1, 2022, and closed on July 8, 2022, with 121 survey responses.

The Summary of Survey Responses, [Attachment B](#), shows the results of the survey responses by stakeholders and their perspective on school district operations and budgets, including personnel expenses, available resources, and professional development costs.

Introduction

The Montana Superintendent of Public Instruction initiated the negotiated rulemaking process to amend the accreditation standards beginning in November 2020, with the research phase concluding in 2022 through the negotiated rulemaking process.

In Chapter 55:

- There were 101 initial rules, with 43 historically repealed, which leaves 58 rules.
- Out of these 58 rules, there were no recommended changes to 13 rules, which leaves 45 rules.
- Five new proposed rules were added.

Thus, the Negotiated Rulemaking Committee (NRC) considered 50 individual rules from Chapter 55.

The proposed accreditation standards change requires the Superintendent to establish an independent NRC under [§ 20-7-101, MCA](#). Superintendent Arntzen selected 21 members to serve on the NRC reflective of the necessary role diversity.

In September 2020, the BPE agreed to open the rules for evaluation of ARM 10, Chapter 55, Accreditation Standards. From November 2020 to December 2021, the Office of Public Instruction (OPI) researched the needs of schools and how to better serve students through updates to the accreditation standards. A summary of the research can be found within Attachment A. An [advisory task force](#) to the Superintendent began reviewing rules for crucial changes beginning January 11, 2022, and concluded their recommendations May 19, 2022. The NRC's work started on February 24, 2022. Detailed information about the committee members, agendas, meeting minutes and recordings can be found on the OPI website [here](#). See [Attachment D](#).

The NRC agreed through the consensus process for proposed changes to accreditation rules that were identified to be on the economic impact survey. The twelve rules are below.

- 1) 10.55.601 - Replacing the Continuous School Improvement Plan (CSIP) and consolidating all plans into an Integrated Action Plan.
- 2) 10.55.603 - Expanding multiple measures in the district assessment plans.
- 3) 10.55.712 - Providing flexibility for local school districts to determine the resources needed when elementary classrooms are overloaded.
- 4) 10.55.704 - Assignment of District Superintendents more clearly identifying statutory requirements and removing ratios for assignments.
- 5) 10.55.705 - Assignment of administrators and principals added clarity around the principal role and removed all except one identifying the number of enrolled students of 125 or more that would require principal FTE.
- 6) 10.55.714 - Updating the Professional Development rule.
- 7) 10.55.723 - Enhancing the existing Mentorship and induction plans required by local boards.
- 8) 10.55.801 - Including a survey tool to measure stakeholders' perceptions of school climate.

- 9) 10.55.803 - Adding the need to assess and supply the learning technology for each student within the Learner Access rule.
- 10) 10.55.806 - Adding English Language Learners to the Special Education and Gifted and Talented subgroups, per federal requirements for districts to provide educational services for English learners.
- 11) 10.55.904 and 10.55.905 - Including Civics/Government and Economics or Financial Literacy within the established high school offerings and graduation requirements.
- 12) 10.55.908 - Adding state to the federal accessibility standards for facilities.

Economic Impact Statement Required Elements

As required by [§ 20-7-101\(1\), MCA](#), the Montana Superintendent of Public Instruction, has prepared this economic impact statement in consultation with the NRC under the provisions of [§ 2-4-405, MCA](#). Each of the elements required to be addressed in the economic impact statement is outlined below.

a) Affected Classes of Persons

Describe the classes of persons who will be affected by the proposed rule, including classes that will bear the costs of the proposed rule and classes that will benefit from the proposed rule. Refer to [§ 2-4-405\(2\)\(a\), MCA](#).

The *classes of persons* affected by the rule changes include individuals from the following groups: school district trustees, K-12 school administrators, K-12 teachers, school counselors, school librarians, school clerks/business officials, parents, and taxpayers.

Costs associated with the rule changes are the responsibility of local school districts.

The beneficiaries of the rule changes are trustees, administrators, teachers, and students of local school districts, as well as Montana communities served by accredited schools.

b) Economic Impact

Describe the probable economic impact of the proposed rule upon affected classes of persons, including but not limited to providers of services under contracts with the state and affected small businesses, and quantify, to the extent practicable, that impact. Refer to [§ 2-4-405\(2\)\(b\), MCA](#).

The OPI surveyed school personnel and stakeholders about the probable economic impact of the proposed new rule/rule amendment for ARM 10.55 with two different surveys. The first survey was released June 20, 2022, and closed on July 5, 2022. The second survey was released July 1, 2022, and closed July 8, 2022. The surveys were individually emailed to 20,321 stakeholders through the OPI bulk email system. The stakeholders included trustees, K-12 administrators, district clerks,

curriculum directors, county superintendents, parents, community members, post-secondary representatives, tribal representatives, and professional association representatives.

The summary results of the surveys are shown in [Attachment B](#).

c) Cost to State Agencies

Describe and estimate the probable costs to the agency and any other agency of the implementation and enforcement of the proposed rule and any anticipated effect on state revenue. Refer to [§ 2-4-405\(2\)\(c\), MCA](#).

The OPI, per [§ 20-7-101, MCA](#), has incurred costs associated with the negotiated rulemaking process, including contracting with a facilitator and convening the NRC. The total cost to the OPI for the negotiated rulemaking process is approximately \$15,000. The OPI does not anticipate additional costs associated with implementing the proposed rule changes. The OPI's experts will develop the accreditation standards guidance document for the districts and schools for any new rules.

The BPE is responsible for filing fees of notices of public hearing of proposed rule changes and publication fees of notices of adoption and amendments with the Secretary of State at \$60 per page. The costs associated with board member attendance at public hearings will be paid within the existing budget of the BPE.

d) Costs and Benefits of the Proposed Rule

Analyze and compare the costs and benefits of the proposed rule to the costs and benefits of inaction. Refer to [§ 2-4-405\(2\)\(d\), MCA](#).

Based on legislative action, Superintendent Arntzen initiated the process of amending the accreditation standards. The agency did not undertake an analysis of the costs and benefits of "inaction."

e) Less Costly or Less Intrusive Methods

Are there less costly or less intrusive methods for achieving the purpose of the proposed rule? Refer to [§ 2-4-405\(2\)\(e\), MCA](#).

There is no less costly or less intrusive method for achieving the purpose of the proposed rule changes.

f) Selection of Proposed Rule

Analyze any alternative methods for achieving the purpose of the proposed rule that were seriously considered by the agency and the reasons why they were rejected in favor of the proposed rule. Refer to [§ 2-4-405\(2\)\(f\), MCA](#).

The agency considered alternative methods for achieving the purpose of the proposed rule. However, since accreditation standards drive the quality of schools, and negotiated rulemaking is statutorily required. It was determined that an alternative method would not result in accreditation standards based on learner outcomes leading to education excellence.

g) Efficient Allocation of Public and Private Resources

*Does the proposed rule represent an efficient allocation of public and private resources?
Refer to [§ 2-4-405\(2\)\(g\), MCA](#).*

Neither the proposed new rules/rule amendments involve any specific allocation of public and private resources.

However, the agency is hopeful that public attention and effort will go into implementing revised/new accreditation standards. Increased local control with more flexibility will allow subsequent actions by local school boards to meet the needs for student learning. It will create opportunities for local districts to meet the goal outlined in the Montana Constitution, "It is the goal of the people to establish a system of education which will develop the full educational potential of each person."

h) Data Gathering and Analysis

Data gathering was completed through a survey process, with the survey results being collected in a data tool system known as Qualtrics. The data analysis included developing graphs from the respondent results to best reflect the responses to each survey question in Attachment B.

There were twelve rules identified by the NRC to be included in the economic impact survey. The response options reflected in the charts were: "Yes"; "No"; "Unsure". In the summary analysis, "No" and "Unsure" were combined in responses, with only a "Yes" being a determinant if the survey respondents believed there was an economic impact.

[Attachment B](#) is the summary of the economic impact survey results by rule.

Conclusion

The NRC has had on-going consultation about the development of this economic impact statement, including the identification of negotiated rules to include in the economic survey.

Between June 20 and July 5, 2022, the OPI distributed a questionnaire to survey school personnel and stakeholders about the probability of economic impact due to the Chapter 55 rule negotiated rule changes. The survey questionnaire was emailed to approximately 20,000 recipients through the OPI bulk email system. The recipients were a comprehensive set of stakeholders. Attachment B provides a summary of the responses received.

Even though the survey participants responses show that responders perceived that ARM 10.55.601(3), ARM 10.55.603(3), ARM 10.55.712, ARM 10.55.723, and ARM 10.55.803(1)(d) may have an economic impact, the responses show no indication that the proposed rule changes would create a significant economic impact for districts and their schools. In an analysis of responses from survey participants, the most consistent and significant responses fall in the category of: "no idea," "unsure," and "can't say"; "I would guess it could be...."

It is important to note that the proposed rule changes for 10.55.601(3) would require local school districts to create and submit an integrated action plan and continue to implement a mentorship and induction program (10.55.723) that currently is outlined as a policy under 10.55.701.

The proposed rule for class size overload in 10.55.712 has embedded more flexibility for local school board of trustees to determine how to address overload compared to the current requirement to staff mandatory instructional aides for specified hours.

Additionally, within 10.55.603(3), the proposed rule expanded the requirement for districts to assess student attainment of content standards from assessment results pursuant to ARM 10.56.101 to multiple measures, which provides more opportunities and ways for schools to measure student proficiency of content standards. Thus, the decision regarding how many resources, fiscal or otherwise, to allocate toward these above rules is left to the discretion of local school trustees.

There is in [Attachment A](#): Chapter 55 Overview, a complete list of the proposed rule changes along with a summary of the research and conceptual changes to the rules. The proposed rule changes shift the input model with outputs of compliancy towards a student-centered learner outcome measure of the quality model. The learner-centered approach to education has risen to the forefront in the last ten years.

It is essential to understand that these proposed changes are for accreditation purposes only for Montana's local schools.

Where there are new rules or process changes, the OPI will provide professional development to districts, ensuring their ability to implement the accreditation standards. The Superintendent's

recommendations to the BPE will be evaluated by the BPE and then facilitated through the Montana Administrative Procedure Act (MAPA) process before any adoption of proposed standards changes are implemented.

Attachment A – Superintendent Recommendations

[\[Attachment\]](#)

Attachment B – Summary of Economic Impact Survey Responses

Survey Demographics by Role

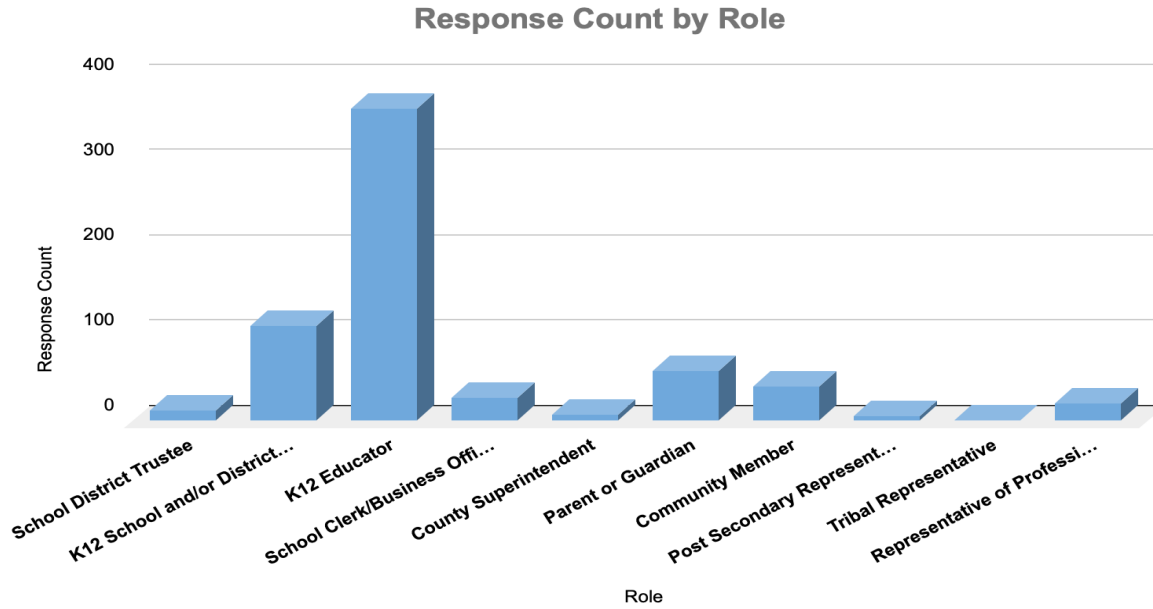


Figure 1 relates to survey one respondents' role. The 652 respondents reflect partial to full completion. The number of full survey completions was 228.

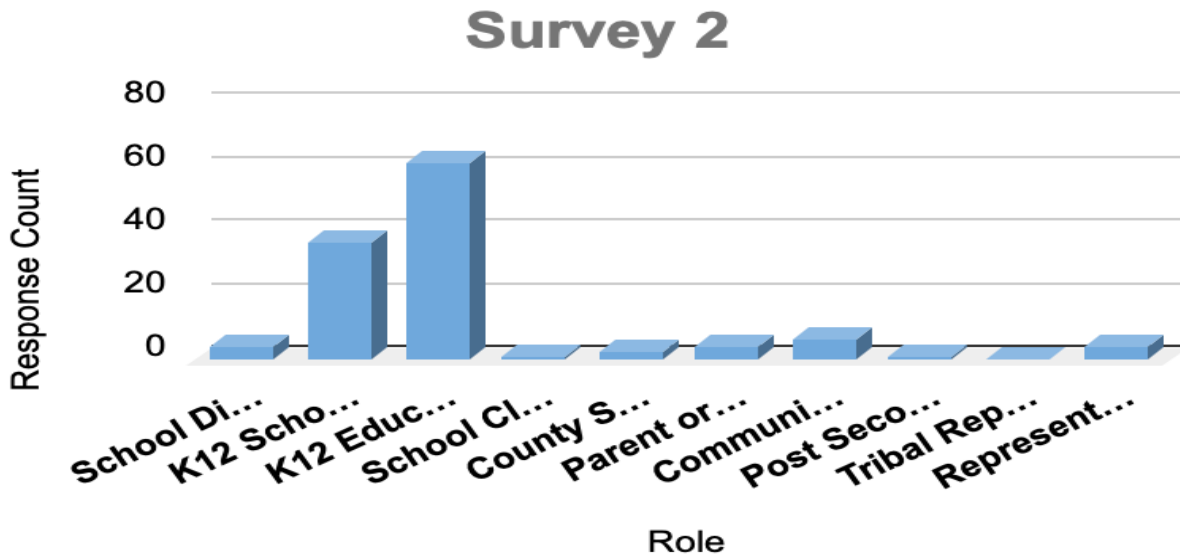


Figure 2 relates to survey two respondents' role. The 121 respondents reflect full survey completion.

Summary of responses to each of the Rules

Do you believe that this amended/new rule will have an economic impact (either receive benefit or bear cost) on the personnel in your district?

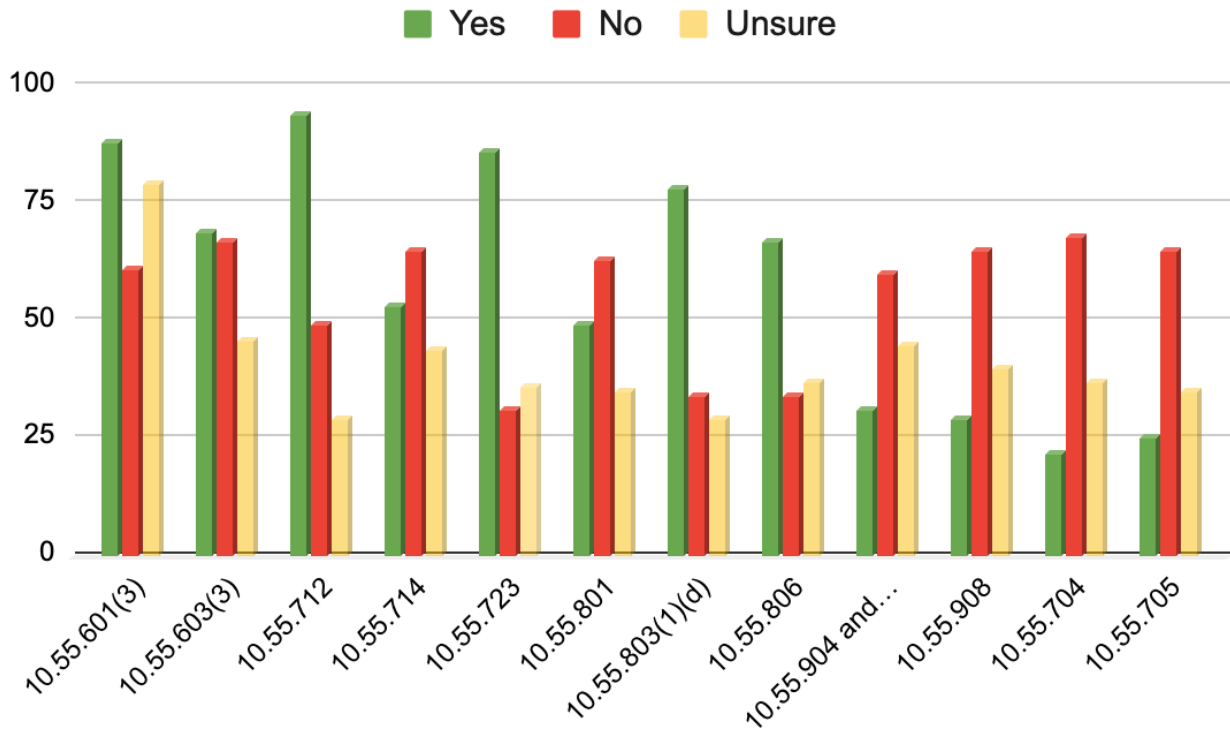


Figure 3 shows respondents' responses to the proposed rule changes' economic impact on a district's *personnel* budget.

Where yes responses indicated the greater response rate, explanations are provided.

Of the ten rules listed, respondents identified three rules that may have an economic impact on **personnel**:

ARM 10.55.712(5) Class Size Elementary – Additional paraprofessionals is replaced with language which provides for additional human to be used to meet this standard.

ARM 10.55.723 is a new Standard: Mentorship and Induction includes a “shall” be provided by districts with specific outcomes through research-based practices. While this is a new rule, it is not a new requirement for school districts.

ARM 10.55.803(1)(d) Learner Access identifies technology hardware and software appropriate to support individual learning. By language ensuring each learner has access to these resources, and local district prior investments or lack thereof, this is a variable economic impact.

Economic impact statements from the survey respondents who responded yes:

ARM 10.55.712(5) – Class Size Elementary

- Unknown, it will depend on the type of resources.
- At least a half-day with a support person paid at a standard rate.
- \$200 per hour to \$100,000.
- This is a case-by-case situation, and a guess would be \$30,000.00.
- In many cases, it may require an additional staff member.

ARM 10.55.723 – Mentorship and Induction

- Unsure.
- \$1700 per mentor stipend.
- \$25,000 per new teacher.
- It depends on what the district decides.
- Estimates are difficult, but districts should budget \$1000-2000 per income staff member.
- Additional time will be needed to allow for observation, training, and meetings.

ARM 10.77.803(1)(d) – Learner Access – Technology Hardware and Software

- Unsure.
 - \$200 per student per year.
 - Range from \$100 to millions.
 - It is district-specific and would depend on current availability, size of the district, funding opportunities.
 - Depends on the year and the hardware/software replacement cycle.
-

Do you believe that this amended/new rule will have an economic impact on available resources in your district?

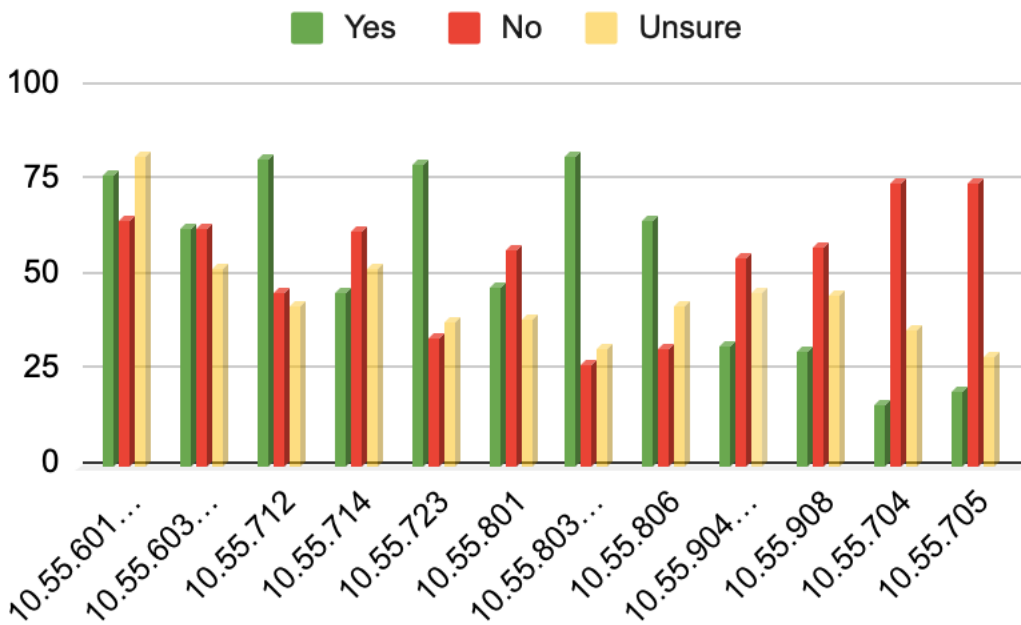


Figure 4 shows respondents' answers to the questions identifying that ARM 10.55.712, ARM 10.55.723, and ARM 10.55.803(1)(d) as having a potential economic impact.

Where yes responses indicated the greater response rate, explanations are provided.

*ARM 10.55.712, ARM 10.55.723 and 10.55.803(1)(d) were identified as having a potential economic impact on **resources**.*

ARM 10.55.712(5) Class Size Elementary - Instructional aides are required in the current language. The language change is additional human resources providing local control over the way to ensure instructional support is provided.

ARM 10.55.723 is a new Standard. Mentorship and Induction that includes a shall be provided by districts with specific outcomes through research-based methods. Mentorship and Induction existed prior in 10.55.701. While a new rule number the requirements are not new standards for local districts.

ARM 10.55.803(1)(d) Learner Access identifies technology hardware and software appropriate to support individual learning. By language ensuring each learner has access to these resources, it requires districts to ensure learner access to technology resources.

Economic impact statements from the survey respondents who responded yes:

ARM 10.55.712(5)

- Unsure.
- This potentially will reduce the number of staff necessary to meet accreditation standards, thereby saving money.
- The cost would be about six teacher salaries.
- \$18,000 to \$2,000,000.
- This rule change would likely save districts money.

ARM 10.55.723

- Unsure.
- Cost of subs to have mentor mentee meetings \$1,000.
- Good mentoring is a ton of extra work. \$3,000.
- \$3,500 per locality.
- Additional pay for meetings and on-going support. \$50,000+.

ARM 10.55.803(1)(d)

- Unsure.
 - \$1,000,000 per year for a refresh of student and staff tech devices.
 - This would vary by district.
 - Anywhere between \$20,000 and \$100,000 or more depending on the size of the district.
 - \$300 per student.
-

Would additional professional development be needed to implement the proposed rule/amendment?

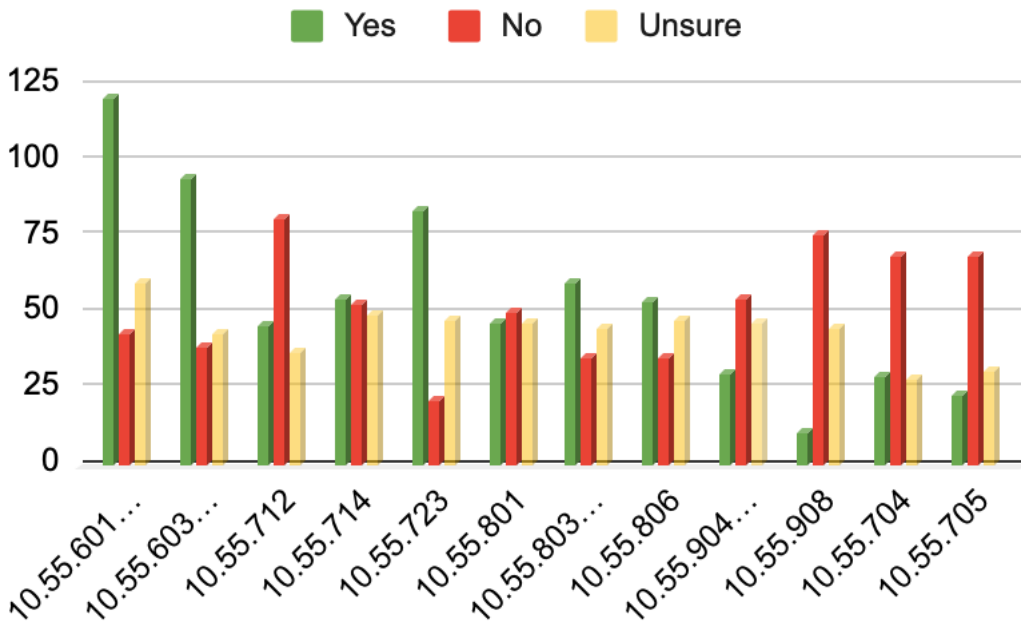


Figure 5 shows respondents' answers to the questions identifying that ARM 10.55.601, ARM 10.55.603, and ARM 10.55.723 as having a potential economic impact.

This addresses the perceived impact of the proposed rule changes on a district's *professional development* budget. Most respondents believe additional professional development would be needed on ARM 10.55.601(3), ARM 10.55.603(3), and ARM 10.55.723.

Where yes responses indicated the greater response rate, explanations are provided.

ARM 10.55.601(3) and ARM 10.55.603(3) were identified as having a potential economic impact on professional development.

ARM 10.55.601(3) Accreditation Standards Procedures changes what a continuous school improvement plan looks like to a learner-centered system with a coherent integrated plan that must be developed for a three-year cycle with annual updates. Professional development includes mentoring and induction, family engagement, learning models, addressing gifted and talented, with these elements clearly spelled out. These elements which include former requirements and new standards elements

ARM 10.55.603(3) Curriculum and Assessment changes the requirements for accreditation at the local level to include student growth and proficiencies. This may require districts to rethink local assessments.

Economic impact statements from the survey respondents who responded yes:

ARM 10.55.601(3) Accreditation Standards Procedures

- Unsure.
- This is something that could be done on a Webinar with very little cost to the school district. \$1000 - \$10,000 per teacher.
- This should be a service the OPI provides to ALL districts and ALL educators throughout the state.
- \$100,000,000,000,000,000.
- \$1,000 to \$100,000.

ARM 10.55.603(3)

- Unsure.
- \$5,000.00 initial travel costs.
- \$500 to \$100,000.
- Reallocation of PIR plans to focus on new requirements.
- \$120 per staff member.

ARM 10.55.723

- Unsure.
 - \$500 per year per mentor.
 - Teachers/Mentors want to be paid for their time. \$10,000.
 - Up to \$10,000 annually but that is a guess.
 - Mentors will require training, along with the administration \$2,000 - \$5,000.
 - We have attempted to do this but finding teachers willing to be trained to be a mentor and put in the time as well has been more than challenging. \$5,000.
-

Does the proposed rule present an efficient allocation of public and private resources?

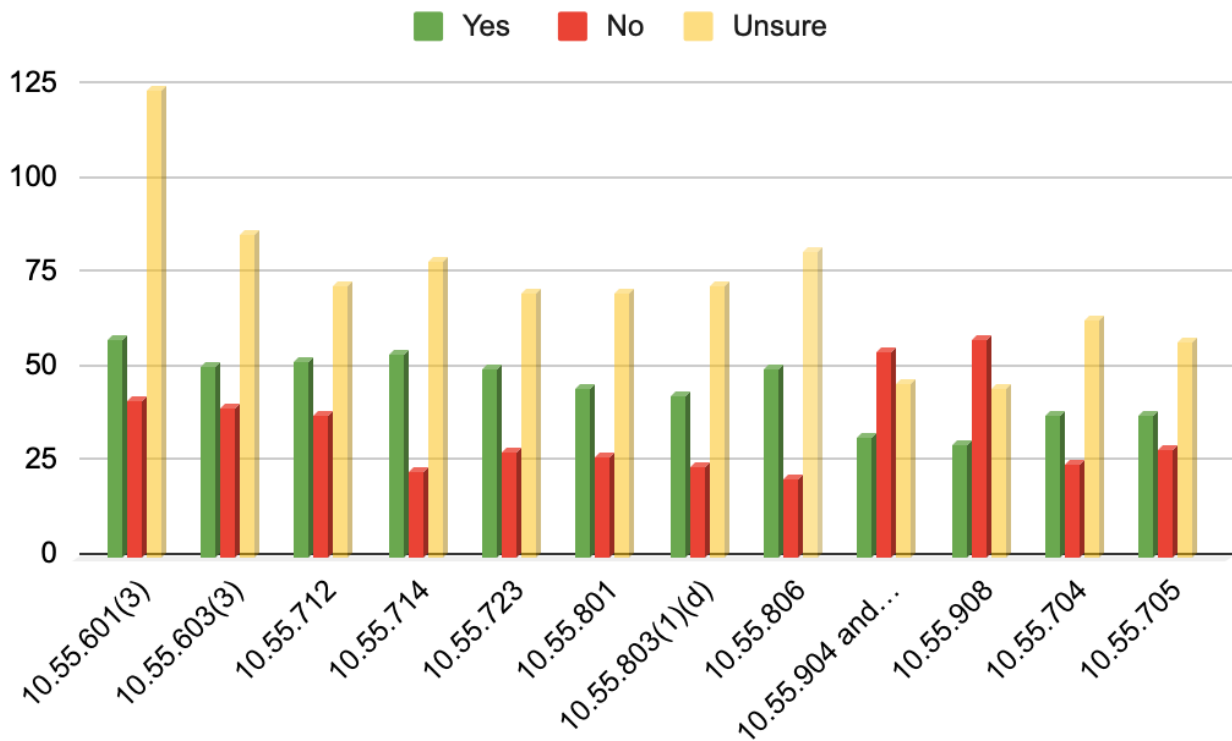


Figure 6 shows that most are unsure about the potential economic impact other than ARM 10.55.904- Basic Education Program Offerings High School and ARM 10.55.905- Graduation Requirements. These two include changes requiring ½ unit of Civics or Government (only three districts do not currently have this requirement) out of the required Social Studies credits and adding ½ unit of Financial Literacy within existing units, where many of the principles are currently taught in Montana schools.

From the responses to this question, there is no evidence of an economic impact.

Is there anything else you would like the Superintendent to know?

- The school buildings in Montana are aging. The state needs to have monies set aside to improve our school buildings.
- Many students, when they leave high school, aren't ready for living on their own or adulting. Financial literacy and learning the civics portion of history are very important so they know how they can better themselves financially.
- ELL falls in that tricky area of Title I funding, so this would help differentiate its meaning.
- Redefining proficiency synonymously with "familiar" may be a strategy to limit expenditures and avoid uncomfortable conversations.
- Districts are already struggling with budgets and hiring staff.
- Consider standardizing a school climate survey tool at the state education agency level for districts to use.
- Effective messaging is crucial in keeping our community in the loop and strengthening the "ties that bind" us all together.
- We need more mental health professionals in our buildings.
- Personalized and job-embedded sounds like meaningful, authentic PD opportunities. Schools also need to ensure that teachers have the time to collaborate with peers after the PD so that the learning can continue and be sustainable. When people feel valued and that they are growing, they are more likely to stay.
- I appreciate the emphasis on proficiency and growth in relation to state standards. That is what education should be about - proficiency over "points." As a parent, I want to know where my student is on specific skills and how they can improve. That tells me more than an "A," or they've completed their HW on time.
- Yes - Elementary and High School districts with separate boards SHOULD NOT be required to share a superintendent. The wording should say that can share a superintendent NOT that they shall. That could create a serious problem when one of the districts is large enough that a full-time superintendent is necessary and yet they would be forced to manage both districts.
- Consider how much placing these burdens on our small local school boards who do not have the time or funding to make all of these changes. We have systems in place to help unify our small county schools and connect them. These proposed rule changes could create increased responsibilities outside of the scope of our volunteer school board members' capacity and time.
- People want to support students and public schools. Public schools are of critical importance to educating our children, and should be financially supported by a federal/state partnership.
- Keeping a guide to reference for Boards and administrators on when FTE numbers or enrollment numbers reach certain thresholds for a "district" as to when to consider full time employment of a Superintendent.
- Yes, quality of schools. Highly trained administrators can cut litigation consistency of policies and programs for kids is imperative.
- Training needs for effective deployment.
- Many county superintendents are half time and do not have support staff within their office to complete their job.
- I think it is helpful to clarify what district requirements in terms of FTE are helpful and should not be arbitrary.
- How and what resources is the OPI willing to dedicate to helping districts be successful in implementing the requirements for Chapter 55?

Attachment C—Quality School Task Force Members

Facilitators:

- Julie Murgel, Senior Manager, OPI
- Tristen Loveridge, Project Manager, OPI
- Jacob Williams, Region 17 Comprehensive Center
- Erich Stiefvater, Region 17 Comprehensive Center

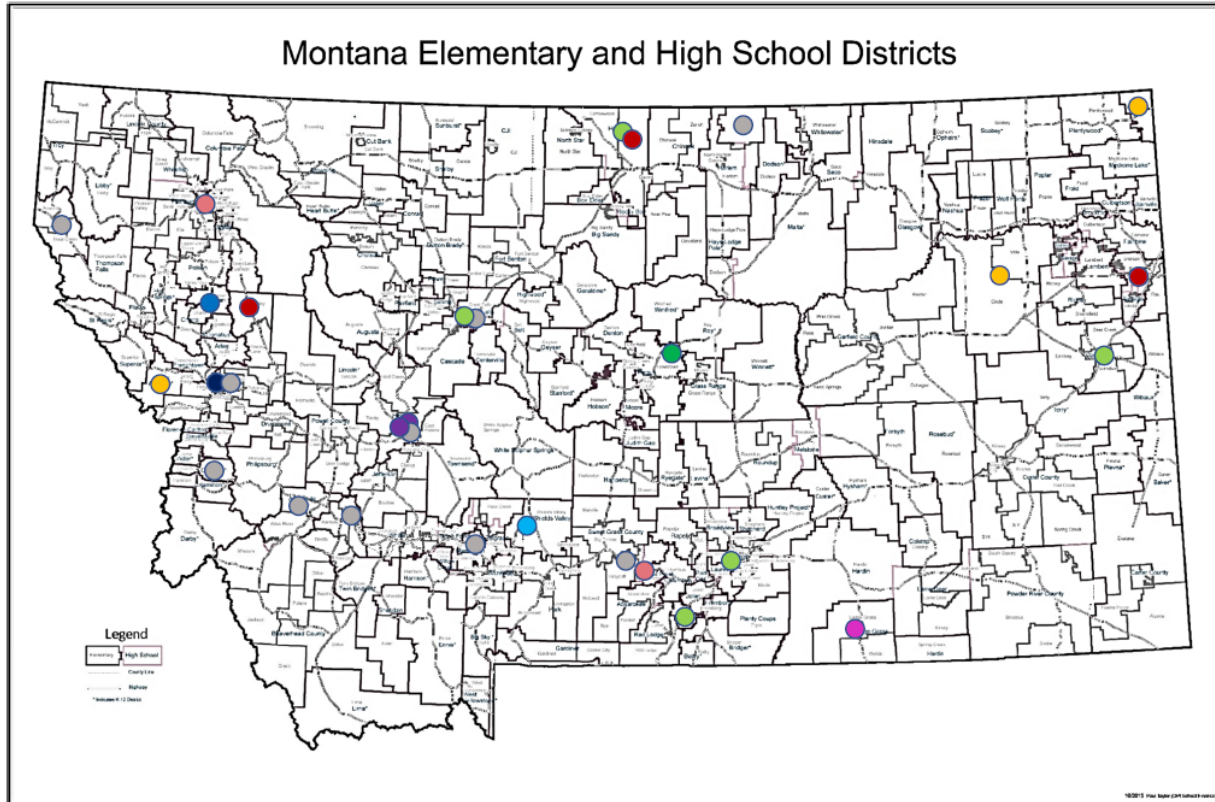
Name	Role
Billi Taylor	District Superintendent, Harrison K-12 Schools
Daniel Lee	Associate Professor, University of Montana
David Pafford	Board Chairperson, Noxon Public Schools
Emily Dean	Director of Advocacy, Montana School Board Association
Gary Lusin	Board Chairperson, Bozeman Public Schools
Gayle Venturelli	Board Chairperson, Anaconda Public Schools
Heather Hoyer	Assistant Superintendent 7-12, Great Falls Public Schools
Heather Jarrett	District Superintendent, Reed Point Public Schools
Janelle Beers	Executive Director, Montana Small Schools Alliance
Jon Konen	District Superintendent, Corvallis K-12 Schools
Tony Warren	District Superintendent and Principal, Turner Public Schools
McCall Flynn (ex-officio)	Executive Director, BPE

Attachment D— Negotiated Rulemaking Committee Members

Facilitator: Aislinn Brown, Deputy Bureau Chief, Agency Legal Services Bureau

Name	Role
Adrea Lawrence	The University of Montana, Dean of College of Education
Chris Olszewski	Billings Public Schools, Curriculum Director
Christina Wekkin	Alberton Public Schools, Teacher
Corey Barron	Lodge Grass Schools, Principal, Tribal Representative
Craig Mueller	Havre Public Schools, District Superintendent
Curtis Smeby	Havre Public Schools, Trustee
Julie Murgel	Office of Public Instruction, Chief Operating Officer
Kelly Dey	Sidney Public Schools, Trustee
Kitty Logan	Swan Valley School, Trustee
Krystal Zentner	Bridger MT, Parent
Lisa Petersen	Westby K-12 Schools, Teacher
Michele Paine	Flathead High School, Principal
Patti Drake	Whitehall School District, District Clerk/Business Manager
Renee Schoening	MT School Counselor Association, Executive Director
Rhonda Long	Fergus County, County Superintendent
Ruth Uecker	Great Falls Public Schools, Assistant Superintendent K-6
Sharyl Allen	Office of Public Instruction, Deputy Superintendent
Stephen Schreibeis	Glendive Public Schools, District Superintendent
Sue Corrigan	Montana School Board Association, Kalispell Municipal Director
Susan Lake	Montana Taxpayer
Tara Hubing	Circle Schools K-12, Teacher

Geographic Representation of Committee Members



- School District Trustees
- K-12 School Administrators
- K-12 Teachers and Counselors
- School Clerks/Business Officials
- School District Administrative Staff
- County Superintendents
- Parents
- Taxpayer
- EPP Representative
- Tribal Representative
- OPI Representative
- Association
- School Quality Task Force

Attachment E—Survey Questionnaire

Q1. What is your primary role? (Please respond to the survey through the lens of the role you select here)

Q2. Do you believe that this amended rule will have an economic impact (either receive benefit or bear cost) on the personnel in your district?

Q3. If Yes, please explain:

Q4. If yes, what increase (in actual dollars) would be required to cover the cost of the economic impact on personnel?

Q5. Do you believe that this amended/new rule will have an economic impact on available resources in your district?

Q6. If Yes, please explain:

Q7. If yes, what increase (in actual dollars) would be required to cover the economic impact to available resources?

Q8. Would additional professional development be needed to implement the proposed rule/amendment?

Q9. If Yes, please explain:

Q10. If yes, what increase, in actual dollars, would be required to cover the cost of additional professional development?

Q11. Is there anything else you believe the Superintendent should consider in determining the economic impact for implementing this new/amended rule?