School Quality – Chapter 55 Accreditation
Superintendent Arntzen’s Recommendations

1. **Elementary Programming** – Added Indian Education for All

2. **High School Programming** – Added Indian Education for All, civics, and financial literacy

3. **Graduation Requirements** – Nearly unchanged since 1971. Added financial literacy requirements and civics while keeping the 20-unit requirement.
   a. Adding Indian Education for All and civics to programming aligns these rules to the Montana Constitution and content standards.

4. **Counselor to student ratios**: Montana has had consistently high suicide rates. Over the last 40 years, Montana has led the nation in suicide rates. More emphasis is needed for solutions. Superintendent Arntzen recommends giving schools and communities the flexibility necessary to make local control decisions on their unique needs in student mental health. She understands the real mental health issues Montana students and families are facing. There are 31 states that do not mandate counselor ratios and these states are not leading the nation in suicide rates. In the 2021-2022 school year, based upon the 400: 1 ratio for elementary and high school, statewide districts were required to have 374.575 counselors Full-Time Equivalent (FTE) (.001 FTE equals 1.4 hours a year). There was 140.788 more counselor FTE hired and spread throughout the state than required by the existing ratio. This proves that schools are recognizing the mental health needs of students and that mandating a historic ratio is not necessary.

5. **Librarian ratios** have also remained static since 1971, with a slight change in elementary minutes for schools with less than 100 students. Library and media specialists play an important role in this rapidly changing educational environment by providing reading support, technology support, safe havens for students. Variance to standards and the quality assurance survey completed in 2021 by school districts indicate that flexibility with licensing ratios is the number one issue to address in the accreditation review.
   a. The Superintendent is advocating for a systematic approach to student mental health. The current ratios restrict how the role of counselors and librarians are filled. The size of schools should not constrain how students are served nor the manner in which school counselors and librarians are hired. The Superintendent’s flexible recommendations when filing the role of counselors and library specialists in school districts may:
      i. Employ
ii. Contract  
iii. Utilize a consortium, multi-district agreement, or interlocal cooperative  
iv. Use any other cooperative  

6. **Middle School Electives** - Current language bases electives on units. Units equal 2 semesters worth of class – think 1 full credit in high school. Middle schools do not grade students by units, nor do they structure their classes by units. It was necessary to remove that language because it is obsolete. Electives such as music, art, and CTE are already required programs in rule. This will not change. 

Montana rule states:  
**ARM 10.55.603** – “Local school districts shall ensure their curriculum is aligned to all content standards and the appropriate learning progression for each grade level.  
(3) School districts shall assess the progress of all students toward achieving content standards and content-specific grade-level learning progressions in each program area. The district shall use assessment results, including state-level achievement information obtained by administration of assessments pursuant to ARM 10.56.101 to examine the educational program and measure its effectiveness.”  

One example of electives required by rule:  
**10.55.1201 ARTS PROGRAM DELIVERY STANDARDS** - “incorporate visual arts (e.g., drawing, painting, printmaking, photography, film, electronic media, sculpture, applied design, installation);  
(ii) incorporate performing arts, including music (e.g., choral music, instrumental music, music appreciation), theater (e.g., drama, play production), and dance;”  

**Chapter 55 Timeline**  

1. In September of 2020 the Board of Public Education agrees to open the rules for recommended changes to Chapter 55 School Quality.  

2. September 2020 – January 2022 – OPI researched the needs of our schools and how to better serve our students through updates to our school quality rules.  

3. January 2022 – formed an 11-member School Quality Taskforce, bringing together educators, community leaders, and parents that represent all of Montana.  

4. January 2022 – May 2022 – School Quality Taskforce met 13 times. The task force decided to focus on making recommended changes to rules guiding library specialists, counselors, middle school, elementary, high school, and graduation requirements.  
   a. The task force makes recommended changes to the Superintendent, which she reviews. She then makes her own recommendations based on those from the task force and sends them to the Negotiated Rulemaking Committee.  

5. February 2022 – June 2022 – A 21-member Negotiated Rulemaking Committee met 16 times (the last scheduled meeting is June 28).  
   a. The negotiated rulemaking process is required by § 20-7-101, MCA, when changes to school accreditation rules occur.
6. The Negotiated Rulemaking Committee reviews the Superintendent’s recommendations and comes to a consensus on whether to accept or reject those changes.

7. The Negotiated Rulemaking Committee’s recommended changes will then be presented to the Board of Public Education in July. The Board of Public Education will vote on adopting the rules.