

FISCAL IMPACT OF REVISIONS TO RULES OF SCHOOL ACCREDITATION

A Report Prepared for the
Education and Local Government Committee

By
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INTRODUCTION

As contained in MCA 20-7-101, prior to the adoption or amendment of any accreditation standard, the Board of Public Education (BPE) must submit proposed amendments to the Education and Local Government Committee (ELG). The ELG then requests a fiscal analysis from the Legislative Fiscal division (LFD). If the fiscal analysis finds that there is a substantial fiscal impact to the school districts then the BPE may not implement the standards until July 1 following the next legislative session. See Appendix A for the full text of the statute.

The LFD was asked to provide a fiscal analysis of proposed amendments to the accreditation rules in Chapter 55 of the Administrative Rules of Montana. The BPE is scheduled to determine whether to adopt the amendments at its September 13th meeting.

FINDINGS OF ANALYSIS

LFD estimates the total statewide incremental fiscal impact for the proposed amendments to be \$1.3 million. Ongoing cost will total \$1.0 million per year. Three quarters of this impact is due to a requirement that districts implement a new mentoring and induction program. While the impact on individual school districts will vary, by the definition developed and adopted by the LFD for previous analyses this impact is not considered to be substantial. See Appendix B for the definition of substantial fiscal impact used by the LFD.

In using this definition the LFD is considering the amendments to the accreditation standards in isolation. It should be noted that the Common Core Standards will also be implemented in July 2013. LFD currently has a draft estimate of \$7.0 million for the implementation of the Common Core Standards. That estimate is awaiting revision based on the outcome of OPI survey of technology readiness using the Technology Readiness Tool from the Smarter Balanced Consortium. It should also be noted that many of the cost related to the Common Core Standards overlap cost in this report.

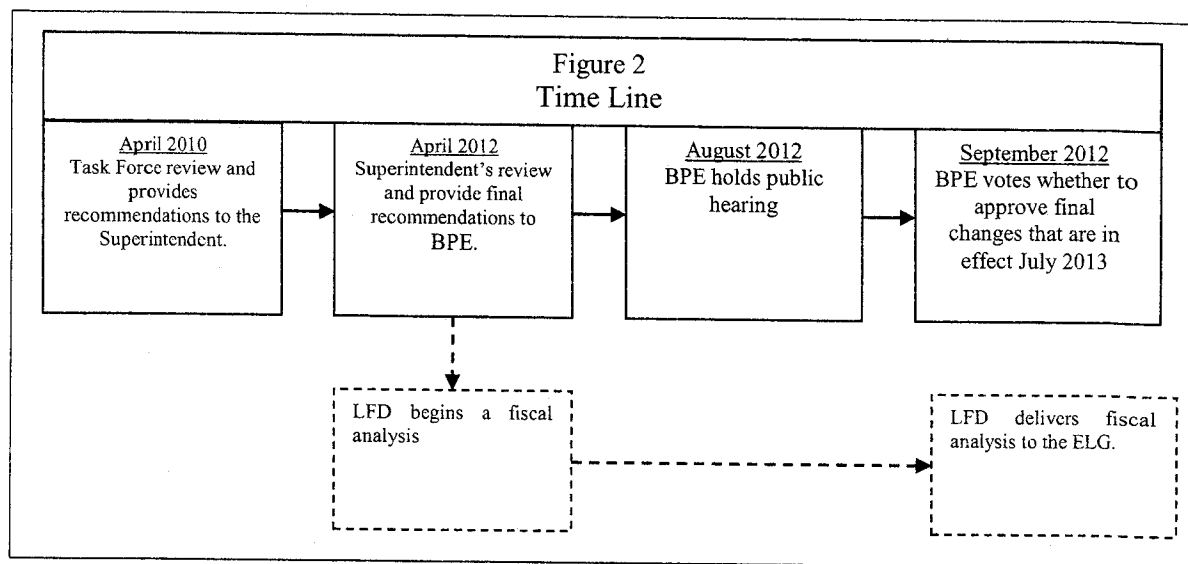
	One Time	On Going	Total Year 1
Changes to 10.55.606: Student Performance		50,000	50,000
Changes to 10.55.701: Evaluation / Mentoring	135,000	825,000	960,000
New Rule 10.55.719: Anti-Bullying	195,000	75,000	270,000

Action required by the ELG interim committee.

There is no action required by the interim committee.

BACKGROUND

In April 2010 the BPE formed a task force to execute a comprehensive review of the rules of accreditation contained in Chapter 55 of the Administrative Rules of Montana. The Office of Public Instruction (OPI) took a leadership role in the review process and provided updates and the final recommendations to the BPE. The task force was comprised of over 40 persons representing various constituents of Montana's education community (Appendix C). The task force reviewed the existing standards and made recommendations to the Superintendent of Public Instruction. The Superintendent reviewed the work of the task force, made further revisions, and delivered the final proposed amendments to the BPE. The task force met for the first time in April of 2010 and the Superintendent's final recommendations were presented to the BPE in April of 2012. On August 20, 2012 the BPE held a hearing to receive public comment. At its September 13th meeting the BPE will vote on whether or not to approve the proposed amendments.



METHODOLOGY

The LFD considered only new expenditures that would result directly from the implementation of the proposed revision to the standards.

The OPI provided the LFD with cost assumptions related to proposed revisions of chapter 55. The LFD also obtained from the task force documents tracking all changes made by the task force and the revisions made by the superintendent. Those revisions with a fiscal impact absorbed completely by the OPI or were fiscally neutral were not included in this analysis. After reviewing all 460 additions and deletions, LFD identified three areas that could potentially have a fiscal impact on the school districts.

- 1) Changes to 10.55.606: Student performance on math, science and reading tests as well as graduation rates would now be part of the accreditation standards; See Appendix D.
- 2) Changes to 10.55.701: School districts are currently required to have policies and procedures in place for the periodic evaluation of all regularly employed certified administrative, supervisory, and teaching personnel. The proposed amendments would require that the evaluation tools meet minimum requirements listed in the proposed amendments; See Appendix D.
- 3) New Rule 10.55.719: Districts would have to have an anti-bullying policy in place; See Appendix D.

A contact list for the 216 school district superintendents was obtained from the OPI. On three different occasions the superintendents were asked to provide input on potential incremental costs related to the proposed amendments.

- In late June and early July the superintendents were contacted by e-mail and asked to comment on what incremental costs might result from implementation of the proposed amendments. Seven districts replied with comments or detailed analysis for their districts
- In the first ten days of August LFD, placed 63 phone calls to various districts which resulted in 26 phone interviews with school district superintendents; and
- Based on the phone interviews LFD developed an online survey. The superintendents in the contact list were invited to complete the survey. As of August 17, 2012, 54 districts had completed the survey.

In total LFD received input from 72 of the 216 school districts superintendents. These 72 superintendents represent 106 schools, 50% of total enrollment, and 41 of the 56 counties in Montana, see figure 3.

Figure 3 Sample Size							
Category by School Size		Responded		State Total		Respondents as Percent Of All Schools in Category	
		Number	Enrollment	Number	Enrollment	Schools	Enrollment
Very Small	Less than 25	7	117	86	880	8%	13%
Small	25 to 124	29	2,072	139	9,113	21%	23%
Medium	125 to 224	23	5,861	71	12,204	32%	48%
Large	225 to 750	32	17,783	80	32,339	40%	55%
Very Large	More than 750	15	44,397	38	86,282	39%	51%
Total		106	70,230	414	140,818	26%	50%

Based on the sample above LFD estimated the current statewide level of compliance with the proposed revisions. New expenditures were then estimated based on the percentage of school districts not currently in compliance with the minimum requirements of the proposed rules.

Limitations to this methodology include:

- 1) Making a statistical inference from our sample to the entire K – 12 school system treats all schools as identical entities. It does not take into account differences in size, available staff resources, culture and local economic pressures; and
- 2) There is a danger that the sample is biased towards those schools least in compliance with the proposed revisions. Districts that believe they are already in compliance may be confident that little or no new expense will be incurred. As a result those districts could be less likely to respond to information request from LFD.

SUMMARY OF FISCAL IMPACT

See the following discussion section for details and fiscal analysis.

Student Performance on Math, Science, and Reading Tests

Most of the districts already have policies and programs to monitor student academic progress. Of the 54 districts that took part in the online survey 54 responded yes when asked if they currently test students to determine academic progress. As currently required by OPI all districts report graduation rates to OPI. 96% of the school districts, representing 99% of the state's teaching staff, surveyed provide professional development to their staff to improve student performance in math, science and reading. The only new cost considered for this area was for the 4% of districts, or 1% of teaching staff, not currently providing professional development.

Staff Evaluation, Induction and Mentoring

Only 24% of the districts have formal induction and mentoring programs in place. The 76% of the districts without a mentoring program will need to develop one. This group represents 75% of the statewide teaching staff. Help is available from OPI which can provide a program that can be adapted to the needs of the local district. OPI also provides mentor training in Helena.

All districts are currently required to have a formal evaluation tool in place although districts will need to review those tools to ensure they comply with the proposed amendments. This will require the formation of a committee to review the district's current tool and compare it to the specific requirements proposed in the new amendments. LFD assumes this committee will be made up of administrators, certified teaching staff and other certified staff. The committee is expected to complete the task in three days.

Anti-Bullying Policy

According to the survey, many schools recognized in recent years the need to dedicate resources to anti-bullying programs and already have policies and programs in effect, 96% of the districts reported having a policy in place. Help in implementing an effective anti-bullying policy is available through OPI or various non-profit organizations. Many of the schools responding to LFDs request for information are using the OLWEUS program. For a description of the OLWEUS program see appendix E. This program has been shown to be effective in several independent studies and is promoted in the United States through Clemson University. LFD will use this program as a model for estimating the cost of implementing an anti-bullying program.

DISCUSSION

LFD will use cost estimates developed for previous studies on education. These assumptions are listed below:

- Substitute Teacher \$75.60/day
- Mileage reimbursement \$0.555/mile
- Hotel (Helena) \$85/day
- Meals \$50/day
- Non contract compensation for teachers \$21.60/hour
- Average travel distance to Helena from various points in Montana is 350 miles round trip.

Proposed Amendments to 10.55.606: See Appendix D for a summary.

In addition to assurance standards a new output standard is being proposed based on student performance on standardized exams and graduation rates. Student performance would be based on:

- Math average scores for all students' grades 3-8 and 10th
- Reading average scale score for all students grades 3-8 and 10th
- Science average scale score for all students grades 4, 8, and 10
- Graduation rates for high schools

LFD identified two expenses related to this proposed amendment.

- 1) Administrative costs related to administering formative assessments, tracking academic progress, and reporting scores; and
- 2) Professional development for teachers designed to improve student academic performance in math, reading, and science.

OPI will collect data and provide feedback to the school districts. To improve student performance districts may incorporate formative assessment programs to track academic progress of students and provide feed-back to instructors to raise student academic achievement and improve the quality of the education. This formative assessment allows students, teachers and parents to measure the effectiveness of teaching methods. This information can then be used to design or designate professional development targeted at improving teaching methods. This formative assessment and periodic evaluation of student performance is already a key element of the Common Core Standards.

In LFD's survey the various school districts were asked:

- 1) Does your district currently periodically test students to determine academic progress?
 - 100% of the school districts surveyed currently take part in some form of formative assessment
- 2) Do you provide professional development to staff in effort to improve student's math, reading or science skills?
 - 96% of the districts provide professional development to improve student's math, reading or science skills? Districts responding "YES" tended to be the larger districts. This 96% of districts represents 99% of the state teaching staff.

LFD will assume that 1% of the statewide teaching staff not currently receiving professional development in this area would receive it under the new rules. LFD assumed that this would include two full days of professional development.

Figure 4 Estimate for Additional Professional Development Hours	
Teachers State Wide	10,224
Districts not providing Professional Development or 1% of teachers	102
16 hours of professional Development per instructor per year @ \$21.6/hour	\$35,251
Substitute Teachers for 2 days	<u>15,422</u>
Total	<u>\$50,674</u>

Proposed Amendments to 10.55.701: See Appendix D for a summary.

There are two areas related to these proposed changes.

- 1) Evaluation Procedures and Policies - The current standard requires that a district have written policies and procedures for the periodic evaluation of teachers and administrative staff but is not specific as to the content of those policies and procedures. The proposed amendments would require each district to have in place an evaluation tool with minimum requirements as described in the amendments. A typical evaluation for an educator covers areas including class planning and preparation, managing the classroom environment, instruction technique, and other professional responsibilities. Under the proposed amendments process, procedures, and model remain the responsibility of the local board of trustees; and
- 2) Mentoring and Induction Requirements - In addition there is a new requirement for schools to establish mentoring and induction programs to assist licensed staff in meeting teaching standards. This proposed amendment only requires a mentoring and induction program but is not specific as to requirements.

Evaluation Procedures and Policies.

LFD surveyed the various districts to determine if the district currently has a formal documented tool that is used to evaluate teaching staff. The responses are listed below, with the results in parenthesis.

- o Yes the district has a formal documented evaluation tool in place (87.0%)
- o No, the district does not have a formal documented evaluation tool in place (7.4%)
- o We are a small district and our evaluation process is informal (5.6%)

For those districts that report not having a written policy in place they must develop one on their own or use a tool that will be developed and provided by OPI. Since a documented procedure is required under the current standards the LFD analysis did not consider expenses related to developing this tool from scratch to be an additional cost.

The LFD analysis assumes that all districts will need to review the existing tool to determine if it is in compliance with the proposed amendments and make adjustments where necessary. Great Falls Public Schools provided a model of a committee consisting of 20 persons or 2.2% of total staff. LFD applies this statewide and consequently assumes that each district will need to form committees made up of administrators, teachers, and other educational professionals and will require three days to complete their work. As of spring 2012 there are

approximately 14,500 professional educators employed by the various districts in Montana. Using this total as a base LFD assumes that all committees statewide would total about 320 persons.

Figure 5
Estimate for Compliance Review of Evaluation Tool

	Statewide Committee	Rate/Day	Committee Days	State Wide Total
Senior Administrative	106	0	3	0
Certified Teaching Staff	107	173	3	55,469
Certified Non-Teaching Staff	107	173	3	55,469
Total Committee Members State Wide	320			
Cost for Substitute Teachers	107	76	3	\$24,268
Total				\$135,205

The new evaluation tool would also require the various districts of the state to provide professional development to educate and inform the staff about the new tool. Since 87% of the districts that responded to the LFD survey reported they already have a formal evaluation document in place, LFD assumed that professional development is already provided. This means that 13% of the districts, which represents 8.1% of the statewide certified staff, would need development. For simplicity this analysis assumes that 8.1% of the statewide staff would need five hours of incremental professional development related to the new standards.

Figure 6
Estimate for Professional Development
Related to the New Evaluation Tool

Estimated Incremental total state wide staff requiring PD related to new standards.	Rate/Hour	Hours Required	State Wide Total
1,175	21.6	5	\$126,900

Some respondents to the survey expressed concern that they may be forced to enter into unscheduled negotiations with their local unions if these amendments were adopted. The following question was posed to the school district superintendents.

If you are required to change your evaluation tools will you need to renegotiate union contracts? Choose one of the following (54 districts responded, the results are in parentheses).

- Yes but we do not expect a fiscal impact as a result (11.1%)
- Yes and there may be a fiscal impact as a result (55.6%)
- No (33.3%)

Given that over 50% of the districts responded that they may be required to enter into unscheduled negotiations and would incur the associated cost LFD, contacted MEA-MFT for their follow up. The LFD interviewed representatives from the MEA-MFT about proposed amendments related to staff evaluation and specifically expressed the concern that districts may need to enter into unscheduled negotiations.

LFDs interview with MEA-MFT as summarized:

- MEA-MFT represents roughly 90% of the Montana Teachers. MEA-MFT was represented on the task force and took an active role in developing the original amendment proposals. According to the MEA-

MFT most Montana school districts enter into contract negotiations every 2 to 3 years. Although the MEA-MFT cannot guarantee or control what action the local unions will take on any issue they do expect the issues related to the proposed amendments can be dealt with in the course of normally scheduled negotiations with the various districts.

Based on this discussion the LFD assumes there will be no cost related to contract re-negotiation.

Mentoring and Induction Requirements

LFD surveyed the various school districts and asked if the district has a formal, documented mentoring program in place. The results were 24% of the districts indicated that they do have a program in place, while 76% of schools or 74% of the statewide teaching staff, either do not have a program in place or have only an informal program. See figure 7.

Figure 7: Does your school have a formal documented mentoring program for new staff?

Yes	13	24.1%
No	19	35.2%
We are a small district and our mentoring program is informal.	22	40.7%
Total Respondents	54	

LFD made the following assumptions to complete the analysis:

- o LFD assumed that each new teacher will be assigned a mentor for three years
- o LFD assumed 9% of all teachers will need a mentor:
 - o OPI estimates about 9% of the teaching force turns over each year. Not all new teachers are rookies and not all rookies will remain in teaching for three years. Turnover at smaller rural schools may differ significantly from schools in more populated areas.
- o LFD will assume a stipend of \$500 per year for the mentors
 - o Not all schools pay mentors a stipend. LFD recognizes that it is desirable to assign the best and most experienced teachers as mentors. Those teachers, due to their years of experience, typically will have many other collateral duties within the school. At the very least there is an opportunity cost even if a teacher is not paid a stipend to mentor. LFD will not consider cost for training mentors since mentor training is not specifically required by the new rules. Training is available through the OPI and an estimate for the expense of training a mentor is provided in the appendix F (\$1,400 per trainee). The training is held in Helena and takes about three days. The OPI website also provides a detailed plan for setting up a mentoring program (appendix F).
- o For the purposes of estimating the fiscal impact LFD assumed that 76% of the districts would need to implement the program.
- o For the induction program, LFD will assume that each district would provide two days of induction and orientation training for all new teachers.

Calculations of expense is summarized in figure 8.

Figure 8
Mentoring / Induction Estimate

Estimated New Teachers State Wide	
Total Teachers State Wide (as of spring 2012)	10,224
Estimated Turnover	9%
Estimated New Teachers	920
Mentoring Cost	
Estimated Mentors Needed	920
Estimated Cost at \$500/year	\$460,000
Two Days Of Induction / Orientation	
Materials (\$20 per Inductee)	\$18,403
Compensation for Inductee	318,007
Compensation for staff (2 from each of 414 schools)	143,078
Total Cost State Wide	939,489
Total Cost for 74% of statewide staff in districts without formal program	\$695,222

LFD estimates the total new expense for proposed revisions to 10.55.701 to be \$957,327. See figure 9.

Figure 9
Total Cost for revisions to 10.55.701

Review of existing evaluation tool	\$135,205
Estimate for professional development	126,900
Induction / Mentoring Program	695,222
Total	<u>\$957,327</u>

Proposed New Rule 10.55.719: See appendix D.

A proposed amendment would require that school districts have in place an anti-bullying policy. The proposed amendments are not specific; however there is ample peer reviewed research available that would suggest how an anti-bullying policy might be constructed.

In LFD's survey the various school districts were asked:

- 1) Does your district currently have in place an anti-bullying policy?
- 2) How many hours of professional development per staff per year are dedicated to the issue of bullying?

Figure 10
Hours of Professional Development per Teacher
per Year Dedicated to Anti-Bullying¹

Professional Development Hours	Number of Respondents	Percent of Respondents
0 hours per year	10	18.5%
1 hour per year	13	24.1%
2 hours per year	10	18.5%
3 hours per year	7	13.0%
4 hours per year	3	5.6%
5 or more hours	11	20.4%
Total Respondents	54	

¹ LFD online survey

96% percent of the districts already have an anti-bullying policy in place. Over 80 percent of the school districts already spend at least one hour of professional development per year per instructor and over 20 percent spend greater than 5 hours per year per instructor. The weighted average is 2.26 hours of professional development per teacher per year related to bullying.

Those districts that do not currently have a policy or program to deal with bullying have several options.

- 1) Districts may develop their own program;
- 2) Districts may download a readymade policy template from OPI. This template can be adapted to meet the needs of the district; and
- 3) They can obtain services from several organizations dedicated to anti-bullying.

There are several outside organizations that provide anti-bullying training and programs. Many of the districts in Montana are using the OLWEUS Bullying Prevention Program (OBPP). The OBPP is a school-based program to prevent bullying through school-wide, classroom, and individual interventions. The program is flexible and can be adapted to meet the needs of schools of varying size and cultures. Eliminating passive acceptance of bullying within school culture is the main goal of the program. See Appendix E for a complete description of the program.

This program requires the formation of a Bullying Prevention Coordinating Committee (BPCC). This committee must be trained by a certified OLWEUS trainer. Most schools find advantages to have a trainer as part of the committee. If a school does not want to have a trainer on the committee an outside trainer can be hired. The cost for an outside trainer is limited to \$3,000 plus travel expenses by the OLWEUS organization. A school must also pay for materials. A cost estimate based on the OLWEUS model and assuming that 4% of the districts will need to implement the program is provided in figure 11.

Figure 11 Cost estimate for implementing anti-bullying program	
Cost to certify an OLWEUS trainer	
Training	4,200
Travel / Meals	1,620
Total per trainer	<u>\$5,820</u>
Total Statewide (414 Schools)	<u>\$2,409,480</u>
BPCC Committee Operating Costs	
BPCC (Meets for 20 hours per School Year)	3,120
One Coordinator per district (\$1,000 Stipend)	1,000
Total Committee Cost	<u>\$4,120</u>
Total State Wide Committie Cost (414 Schools)	<u>\$1,705,680</u>
Professional Development	
Total State Wide PD cost 2.26 hours per teacher	\$23,106
Materials (see appendix F)	
School wide Guide 4 per school	115,920
Teacher Guide 1 for every 3 teachers	2,346,967
Online Survey and Processing \$0.95 per student	\$133,777
Total Materials Cost	<u>\$2,596,664</u>
State Wide Cost	
One time cost	4,872,367
On Going Cost	1,862,563
Total State Wide Cost	<u>\$6,734,930</u>
Incremental Fiscal Impact (4% of districts)	
One Time Cost (Training and Materials)	194,895
On Going Cost (Committies, Professional Development, Survey)	<u>\$74,503</u>
Total	<u>\$269,397</u>

APPENDIX A

RELEVANT MCA

20-7-101. Standards of Accreditation.

- (1) Standards of accreditation for all schools must be adopted by the board of public education upon the recommendations of the superintendent of public instruction.
- (2) Prior to adoption or amendment of any accreditation standard, the board shall submit each proposal to the education and local government interim committee for review. The interim committee shall request a fiscal analysis to be prepared by the legislative fiscal division. The legislative fiscal division shall provide its analysis to the interim committee and to the office of budget and program planning to be used in the preparation of the executive budget.
- (3) If the fiscal analysis of the proposal is found by the legislative fiscal division to have a substantial fiscal impact, the board may not implement the standard until July 1 following the next regular legislative session and shall request that the same legislature fund implementation of the proposed standard. A substantial fiscal impact is an amount that cannot be readily absorbed in the budget of an existing school district program.
- (4) Standards for the retention of school records must be as provided in 20-1-212.

History: En. 75-7501 by Sec. 372, Ch. 5, L. 1971; R.C.M. 1947, 75-7501; amd. Sec. 2, Ch. 543, L. 1983; amd. Sec. 4, Ch. 208, L. 2005.

20-7-102. Accreditation of schools.

- (1) The conditions under which each elementary school, each middle school, each junior high school, 7th and 8th grades funded at high school rates, and each high school operates must be reviewed by the superintendent of public instruction to determine compliance with the standards of accreditation. The accreditation status of each school must then be established by the board of public education upon the recommendation of the superintendent of public instruction. Notification of the accreditation status for the applicable school year or years must be given to each district by the superintendent of public instruction.
- (2) A school may be accredited for a period consisting of 1, 2, 3, 4, or 5 school years, except that multiyear accreditation may be granted only to schools that are in compliance with 20-4-101.
- (3) A nonpublic school may, through its governing body, request that the board of public education accredit the school. Nonpublic schools may be accredited in the same manner as provided in subsection (1).
- (4) As used in this section, "7th and 8th grades funded at high school rates" means an elementary school district or K-12 district elementary program whose 7th and 8th grades are funded as provided in 20-9-306(14)(c)(ii).

History: En. 75-7502 by Sec. 373, Ch. 5, L. 1971; amd. Sec. 4, Ch. 352, L. 1974; R.C.M. 1947, 75-7502; amd. Sec. 1, Ch. 270, L. 1979; amd. Sec. 1, Ch. 150, L. 1983; amd. Sec. 1, Ch. 73, L. 2001; amd. Secs. 3, 4, Ch. 462, L. 2005; amd. Sec. 6, Ch. 4, Sp. L. December 2005; amd. Sec. 5, Ch. 418, L. 2011.

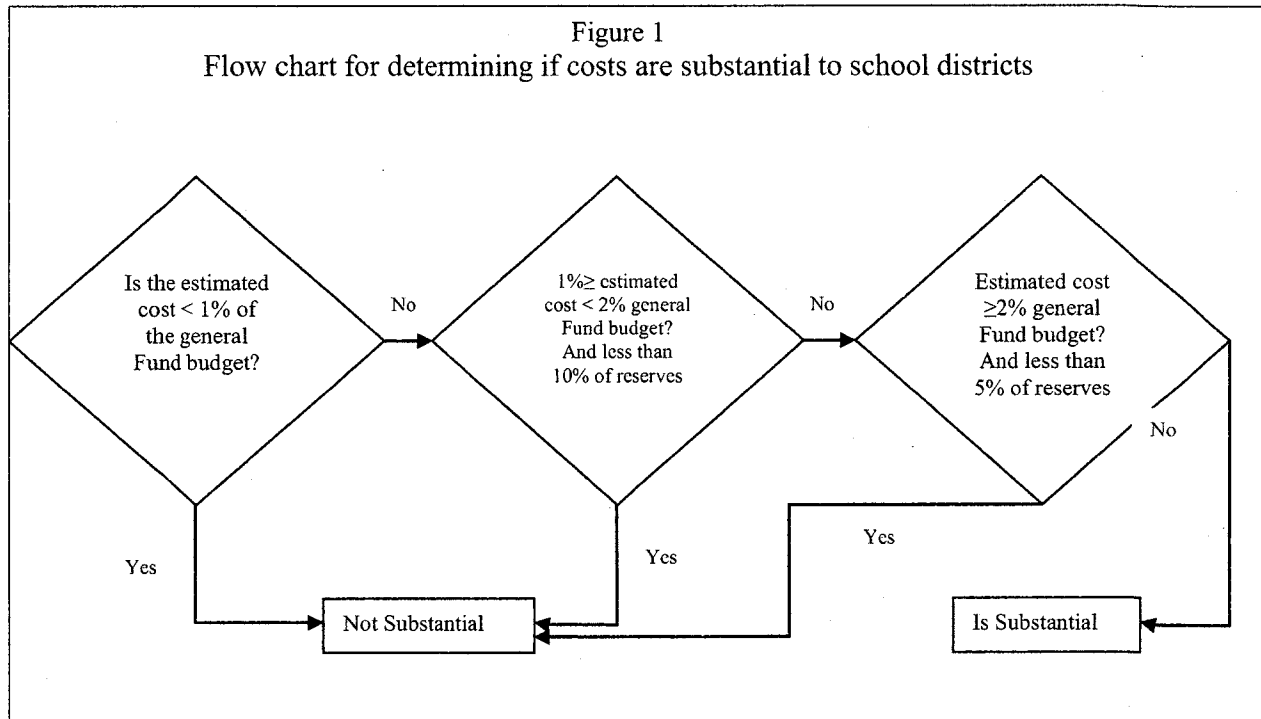
APPENDIX B

DEFINITION OF SUBSTANTIAL

Statute 20-7-101, MCA, requires the LFD to deliver to the ELG a fiscal analysis prior to any changes to the standards of accreditation. Specifically the statute requires that the LFD determine if the changes to the accreditation standards will have a substantial impact, defined in statute as "...cannot be readily absorbed in the budget of an existing school district program." Legal staff from the Legislative Services Division conducted an extensive review of the legislative history and precedent related to substantial cost both within and outside Montana. No precedent was found and nothing in the legislative history suggested or offered a definition of substantial. As a result, it fell to the LFD to establish a standard to determine what could not be readily absorbed within an existing budget for the purposes of this analysis.

Three LFD analysts, Jim Standaert, Rob Miller, and Kris Wilkinson, met to discuss a standard. The discussion was centered on what financial resources were available to the school districts. Two were identified: 1) the existing budget; and 2) four reserve funds: the general fund, flex fund, impact aid fund, and technology. LFD compared the implementation cost of common core to school districts' financial resources using the standard described below.

If the implementation costs are less than 1% of the general fund budget for the district, the LFD assumes the school district can readily absorb the costs within the school district budget. If implementation costs are between 1 and 2% of the general fund budget and more than 10% of the overall reserves listed above or if the implementation cost is more than 2% of the general fund budget and more than 5% of the reserves, the LFD assumes that the school district cannot readily absorb the costs within its budget. See Figure 1.



APPENDIX C

CHAPTER 55 TASK FORCE MEMBERS²

The Chapter 55 Joint Task Force shall provide to the Superintendent and the BPE recommendations for amendments to ARM 10.55.

Task Force Co-Chairs

Patty Myers – Board of Public Education

Dennis Parman – Office of Public Instruction

Task Force BPE and OPI Representatives

John Edwards – Board of Public Education

Nancy Coopersmith – Office of Public Instruction

Staff

Board of Public Education

Steve Meloy
Peter Donovan
Carol Will
Kris Stockton

Office of Public Instruction

Linda Peterson
Elizabeth Keller
Colleen Hamer
Donna Waters

Chapter 55 Joint Task Force

Member	Organization	Member	Organization
John Edwards	Board of Public Education	Callie Langohr	School Administrators
Erin Lipkind	County Superintendents	Chris Stout	School Administrators
Mary Ellen Fitzgerald	County Superintendents	Darrell Rud	School Administrators
Sharon Applegate	CSPAC	Holly Bailey	School Administrators
ChrisTina Rehbein	Elementary Teachers	Jim Germann	School Administrators
Marco Ferro	MEA-MFT	Joe Rapkoch	School Administrators
Dee Hensley-Maclean	Montana PTA	Linda Reksten	School Administrators
Bob Currie	MT Digital Academy	Mike Reynolds	School Administrators
Corri Smith	MT Indian Educators	Orville Getz	School Administrators
Michelle Mitchell	MT Indian Educators	Ruth Uecker	School Administrators
Sandra Boham	MT Indian Educators	Tena Versland	School Administrators
Dave Puyear	MT Rural Education Assn.	Lance Melton	School Boards of Montana
Claudette Morton	MT Small Schools Alliance	Leslie Weldon	School Trustees
Nancy Coopersmith	Office of Public Instruction	Mary Ruby	School Trustees
Bill McCaw	Postsecondary Educators	Lorrie Tatsey	Secondary Teachers
		Sue Brown	Secondary Teachers

² OPI website <http://opi.mt.gov/Programs/Accred/Chapt55.php>

APPENDIX D

SUMMARY OF CHANGES

Changes to 10.55.606 (Standards of Accreditation)

In addition to assurance standards accreditation will also depend on student performance.

Student performance will be based on:

- Math average scores for all students' grades 3-8 and 10th.
- Reading average scale score for all students grades 3-8 and 10th.
- Science average scale score for all students grades 4, 8, and 10
- Graduation rates for high schools.

Changes to 10.55.701 (4), (5) (Staff Evaluation and Mentoring)

This is a new requirement for policies and procedures for the regular and periodic evaluation of all regularly employed school district employees. In addition there is a requirement for schools to establish teaching, mentoring, and induction programs to assist all licensed staff in meeting teaching standards.

Amendments related to this change include:

(a) The evaluation system for licensed teachers used by a school district shall include an assessment of the extent to which the teacher:

- (i) understands how learners grow and develop, recognizing that patterns of learning and development vary individually within and across the cognitive, linguistic, social, emotional, and physical areas, and designs and implements developmentally appropriate and challenging learning experiences;
- (ii) uses understanding of individual differences and diverse cultures and communities, including American Indians and tribes in Montana, to ensure inclusive environments that enable each learner to meet high standards;
- (iii) works with others to create environments that support individual and collaborative learning, and that encourage positive social interaction, active engagement in learning, and self-motivation;
- (iv) understands the central concepts, tools of inquiry, and structures of the discipline(s) he or she teaches and creates learning experiences that make the discipline accessible and meaningful for learners to assure mastery of the content;
- (v) understands how to connect concepts and use differing perspectives to engage learners in critical thinking, creativity, and collaborative problem solving related to authentic local and global issues;
- (vi) understands and uses multiple methods of assessment to engage learners in their own growth, to monitor learner progress, and to guide the teacher's and learner's decision making;
- (vii) plans instruction that supports every student in meeting rigorous learning goals by drawing upon knowledge of content areas, curriculum, cross-disciplinary skills, and pedagogy, as well as knowledge of learners and the community context;
- (viii) understands and uses a variety of instructional strategies to encourage learners to develop deep understanding of content areas and their connections, and to build skills to apply knowledge in meaningful ways;
- (ix) engages in ongoing professional learning and uses evidence to continually evaluate his/her practice, particularly in the effects of his/her choices and actions on others (learners, families, other professionals and the community), and adapts practice to meet the needs of each learner;
- (x) seeks appropriate leadership roles and opportunities to take responsibility for student learning, to collaborate with learners, families, colleagues, other school professionals, and community members to ensure learner growth, and to advance the profession; and

(xi) demonstrates understanding of and ability to integrate history, cultural heritage, and contemporary status of American Indians and tribes in Montana.

(b) The evaluation system for licensed administrators used by a school MAR Notice No. 10-55-261 district shall include an assessment of the extent to which the administrator:

(i) facilitates the development, articulation, implementation, and stewardship of a school or district vision of teaching and learning supported by the school community in order to promote the success of all students;

(ii) promotes a positive school culture, provides an effective instructional program, applies best practice to student learning, and designs comprehensive professional growth plans for staff in order to promote the success of all students;

(iii) manages the organization, operations, and resources in a way that promotes a safe, efficient, and effective learning environment in order to promote the success of all students;

(iv) collaborates with faculty, families, and other community members, responds to diverse community interests and needs, including American Indian communities in Montana, and mobilizes community resources in order to promote the success of all students;

(v) acts with integrity, fairness, and in an ethical manner in order to promote the success of all students; and

(vi) understands, responds to, and ethically influences the larger political, social, economic, legal, and cultural context in order to promote the success of all students.

(c) Establish mentoring and induction programs to assist licensed staff in meeting teaching standards as defined in ARM 10.55.701(4)

New Rule 10.55.719 Student Protection Procedures (Anti-Bullying)

Amendments include:

(1) A local board of trustees shall adopt a policy designed to deter persistent threatening, insulting, or demeaning gestures or physical conduct, including an intentional written, verbal or electronic communication or threat directed against a student or students regardless of the underlying reason for such conduct, that:

(a) causes student physical or emotional harm, damages a student's property or places a reasonable fear of harm to the student or the student's property;

(b) substantially and materially interferes with access to an educational opportunity or benefit; or

(c) substantially and materially disrupts the orderly operation of the school.

(2) Behavior prohibited under (1) includes retaliation against a victim or witness who reports behavior prohibited under (1).

(3) "Persistent" as used in this rule can consist of repeated acts against a single student or isolated acts directed against a number of different students.

MAR Notice No. 10-55-261

(4) The behavior prohibited in (1) includes but is not limited to conduct:

(a) in a classroom or other location on school premises;

(b) during any school-sponsored program, activity, or function where the school is responsible for the student including when the student is traveling to and from school or on a school bus or other school-related vehicle; or

(c) through the use of electronic communication, as defined in 45-8-213, MCA, that substantially and materially disrupts the orderly operation of the school or any school-sponsored program, activity, or function where the school is responsible for the student.

(5) Each local board of trustees has discretion and control over the development of its policies and procedures regarding behavior prohibited under (1), but each district's policies and procedures must include at a minimum:

(a) a prohibition on the behavior specified in (1), regardless of the underlying reason or reasons the student has engaged in such behavior;

(b) a procedure for reporting and documenting reported acts of behavior prohibited under (1);

(c) a procedure for investigation of all reports of behavior prohibited under (1)(a) that includes an identification of the persons responsible for the investigation and response;

(d) a procedure for determining whether the reported act is subject to the jurisdiction of the school district or another public agency, including law enforcement, and a procedure for referral to the necessary persons or entity with appropriate jurisdiction;

(e) a procedure for prompt notification, as defined in the district policy, of the alleged victim and the alleged perpetrator, or the parents or guardian of such students when the students are minors;

(f) a procedure to protect any alleged victim of behavior prohibited under (1)(a) from further incidents of such behavior;

(g) a disciplinary procedure establishing the consequences for students found to have committed behavior prohibited under (1); and

(h) a procedure for the use of appropriate intervention and remediation for victims and perpetrators.

APPENDIX E

DESCRIPTION OF OLWEUS BULLYING PROGRAM³

The program consists of forming a Bullying Prevention Coordinating Committee (BPCC) that may consist of the school principal, teachers, counselors, school psychologist, school nurse, non teaching staff (bus drivers, playground monitors, and cafeteria workers), parents, and community leaders.

Description of the OLWEUS Bullying Prevention Program

School Wide Level

- Establish Bullying Prevention Coordinating Committee (BPCC)
- Conduct training for staff.
- Conduct a school-wide survey to establish a baseline and to track progress.
- Hold staff discussions to discuss issues and develop plans
- Develop and introduce school rules against bullying
- Involve the parents and the rest of the communities

Classroom Level

- Post and enforce school wide rules against bullying
- Hold regular classroom meetings
- Hold meetings with students' parents

Individual Level

- Supervise students' activities
- Ensure that all staff intervenes on the spot when bullying occurs
- Hold meetings with students involved in bullying
- Hold meetings with parents of involved students
- Develop individual intervention plans for involved students

The BPCC must be trained by a certified OLWEUS trainer and many schools have found it worthwhile to have a certified trainer as part of their committee. To become a certified trainer a person must undergo initial and ongoing training, participate in a site visit, have regular consultations, provide training, and provide progress reports and documentation.

- Complete initial three day training
- Complete two-day training about one year after the initial training.
- Regular consultation with assigned OLWEUS mentor over 24 months (included in cost)
- Participate in a site visit from mentor.
- Train at least 2 Bullying Prevention Coordinating Committee (BPCC) within 24 months.
- Provide follow-up consultation with BPCC for 18 to 24 months.
- Provide progress reports and documentation of all training activities and follow up of BPCC

The entire cost is \$4,200 per trainer plus travel and lodging. In addition, the trainee also receives training material, enough for training two BPCCs.

³ Clemson University, OLWEUS Bullying Prevention Program, <http://www.clemson.edu/olweus/>

There are currently 22 certified OLWEUS trainers in Montana.

Figure 10
 Certified OLWEUS trainers in the state of Montana⁴

Organization	Location	Number of Certified Trainers
Great Falls Public Schools	Great Falls, MT 59404	7
East Helena School District	East Helena, MT 59635	2
Independent Consoler	Kalispell, MT 59901	2
Lame Deer Public Schools	Lame Deer, MT 59043	2
American Leadership Board, LLC	Lakeside, MT 59922	1
Blackfeet Honor Your Life	Browning, MT 59417	1
Bozeman School District #7	Bozeman, MT 59715	1
Browning Public Schools, District #9	Browning, MT 59417	1
Cascade County Sheriff's Office	Great Falls, MT 59404	1
Heart Butte School	Heart Butte, MT 59448	1
Quality Professional Development Corporation	Browning, MT 59417	1
Ronan School District #30	Ronan, MT 59864	1
Whitefish Consultants	Whitefish, MT 59937	1

Although a trainer is not required to charge a fee they are limited to charging no more than \$3,000 to train two BPCCs. This does not include training materials or travel expenses.

To operate the program the school district must purchase the following materials:

- A school-wide manual which is the blueprint for establishing the program. The guide contains a CD-ROM which contains training and informational material which the committee is licensed to reproduce as needed. At least one for every three member of the committee is recommended.
- A teacher's guide which is the operational guide book. It is for use by teachers and other support staff on the front lines. All materials that are needed to implement the program are contained on an accompanying CD-ROM and may be reproduced as necessary to implement the program.
- The bullying questionnaire used to determine a base line level of bullying activity and to track progress. The questionnaire is available as a scannable questionnaire or the survey can be taken online. The survey is then submitted to the publisher for processing.

⁴ Clemson University OLWEOUS website <http://www.clemson.edu/olweus/trainers.html#montana>

Pricing Guide for Olweus Materials⁵

School wide Guide

- 1-9 copies \$89.95 ea.
- 10-29 copies \$79.00 ea.
- 30-49 copies \$69.00 ea.
- 50-99 copies \$66.00 ea.
- 100 or more copies \$63.00 ea.

Teacher Guide

- 1-9 copies \$59.00 ea.
- 10-29 copies \$52.00 ea.
- 30-49 copies \$46.00 ea.
- 50-99 copies \$44.00 ea.
- 100 or more copies \$42.00 ea.

Olweus Questionnaire

Paper Version

\$38.50 for a package of 30 surveys-This cost also includes the Standard Report that schools receive with the analyzed data

Online Version

- 100-2,000 copies-\$0.95/ per student
- 2,001-4,000 copies-\$0.75/ per student
- 4,001-5000 copies-\$0.65/ per student
- 5001 or more copies- \$0.55/ per student

⁵ Hazelden Publications

APPENDIX F

SETTING UP A MENTORING PROGRAM IN A SCHOOL DISTRICT

SUGGESTED TIMELINE/ACTIVITIES⁶

The timelines suggested below are guidelines and can be adapted to meet the specific need of each district. Districts may want to consider starting the planning process earlier in the school year to avoid the end-of-year crunch.

Year Prior to Implementation of Mentor Program

January

- School or district leadership team, including teacher union leadership, view PowerPoint on Best Practices in Mentoring developed by the Office of Public Instruction (OPI).
- Discuss possible number of new teachers for following year and mentor program development.
- Identify a temporary mentor coordinator for the implementation of the district mentor program.
- Contact OPI regarding mentor training opportunities or potential mentor trainer for the initial implementation.

February

- School Board Meeting – introduce temporary mentor coordinator, view and discuss the PowerPoint presentation on Best Practices in Mentoring.
- School Board, superintendent and teacher union representatives (in districts where collective bargaining does not exist, include teacher representatives) – set up a committee (including School Board representative, administration, and teachers) to jointly develop Mentor Program Guidelines and begin to discuss program implementation.

March

- Bargain appropriate contract language or memoranda for mentoring program. This may require a memorandum of agreement in those school communities with ongoing, multi-year negotiated agreements.
- Have School Board approval of Mentor Program.

April

- Building principals and union leaders discuss the new program with teachers at affected school sites.
- Ask for interested teachers to apply, following the Mentor Program guidelines and the bargained agreement.

May

- Select teachers for training to participate as mentors.

Spring – Summer

Inform newly hired teachers that they will participate in Mentor Program and share guidelines of the program. 8/7/2008 2 of 2

⁶ OPI Website

June

- Send a team of three to the Teacher Mentor Trainer Institute, or find an alternative option for training the mentor program trainers.
- Set up training schedule with mentor trainer for following year, corresponding with the already established Mentor Program guidelines.

Year One of Implementation

Based on setting up five to six training sessions, three hours each, for teacher.

Early August

- Hold a planning meeting for mentor trainers to reflect on activities and the district mentor program guidelines.
- Match mentors and protégés.
- Set up introductory meeting for teams prior to beginning of school.
- Add a day, following the bargained agreement and mentoring program guidelines, for mentors and protégés to work together and begin training with Mentor Trainers.

September

Mentor Training in skills of consulting, collaborating, and coaching.

November

Mentor Training in skills of goal setting, planning, problem solving, and reflecting.

January

- Mentor Training in verbal skills and supportive language.
- Discuss possible number of new teachers for following year and how many mentors may be needed.

April

Mentor training in skills of developing a professional vision of learning for protégés.

May

- Meetings set up with mentors and protégés to evaluate program for first year. Include members of committee who developed the program to review guidelines and make any changes for next year.
- Open up opportunities for additional staff for mentor training.

June

- Send original three members of the trainer team to the Refresher Teacher Mentor Trainer Institute.
- If additional trainers are needed send personnel to the full Teacher Mentor Trainer Institute.

OPI Mentoring Program cost estimate per mentor

LFD also assumed that each district would send 2 individuals for mentor training. Since the program is in Helena LFD assumed on average participants would travel 175 miles, which is the average distance between Helena and the following cities and towns: Kalispell, Missoula, Butte, Bozeman, Billings and Wolf Point. For mileage reimbursement LFD will use the current IRS allowance for a personnel vehicle of \$0.555/mile. The training is assumed to take 3 days and require a fee of \$75/participant for materials and other expenses.

Below is a sample calculation for sending one individual to Helena for mentor training.

Cost Estimate for Mentor Training	
Travel (assume 350 miles and \$0.555 per mile)	194
Hotel in Helena MT (3 nights at \$85)	255
Meals (\$50 per day)	150
Fee and materials	75
Compensation for participants	518
Substitute Teacher	227
Total Cost per trainee	\$1,419

APPENDIX G

INPUT FROM VARIOUS SCHOOL DISTRICTS.

Email received from Missoula County Public Schools 8/24/12

Good morning, Robert-

I apologize for the time it has taken to get the following information to you. Our curriculum and professional development coordinators returned to work earlier this week and I wanted them to be able to react to your questions. These initial responses are very preliminary and are a best attempt to provide you with a quick snapshot of our needs in Missoula County Public Schools relative to Chapter 55.

10.55.606 – Increase Math, Reading and Science scores; improve graduation rates

1. Professional Development to increase student performance: It is somewhat difficult to assess a cost that is specifically related to changes in Chapter 55. My example is that 2012-13 is the regular cycle for review of our Math curriculum. Regardless of the Chapter 55 changes, we would have gone through the process of establishing a committee and compensating employees for their participation. We will make materials recommendations/purchases in the spring of 2013 and we will engage in significant professional development activity. The scope of the purchases and the professional development will be directly related to the budget (what can we afford to purchase from year-end dollars). We project an expenditure of approximately \$300,000 on materials and an additional \$75,000 on professional development. We have developed a training module which would provide thirty hours of math professional development in a program titled Developing Mathematical Ideas (DMI). To complete this training in single year with all math teachers would cost approximately \$225,000 (compensating staff for time outside of the contract) which is simply not feasible given our current budget.
2. With regard to reading instruction and migration to Common Core, we completed our curriculum review in May of 2012. We purchased about \$270,000 in materials and will recommend additional purchases in May of 2013 if budget is available (year end dollars). Again, the full professional development plan will cost approximately \$75,000 in addition to the hours we have committed through a weekly professional development plan with an early release of students on Thursday afternoons.
3. We are just initiating a review of the science standards, including the “next generation” and this is out of our normal cycle of review. We will likely need to find approximately \$250,000 to complete an interim review, provide professional development and purchase some additional lab materials and resources. Additional expense will be incurred when we complete a full review in two years.

10.55.701

1. Our current evaluation instrument is included in the collective bargaining agreement. Per the CBA, a committee would need to be convened to study the instrument and make recommendations to the bargaining committee in the spring of 2013. The instrument would need a fairly comprehensive rewrite to meet the Chapter 55 proposed requirements. This would be fairly time consuming, but this would be an additional duty for which there would not be additional staff compensation. (It will cost us time.)
2. Due to budget reductions we eliminated our new teacher mentor program in 2012. With forty-two new certified staff hired for 2012-13, the cost of the former program would have been approximately \$29,000. Our old program, however, was in need of review. I would suggest that a replacement program would need to have an infusion of resources to enhance the quality. A rough projection would place the cost at \$50,000 (approximately \$1,000 per new hire with some additional overhead costs).

10.55.719

I would not anticipate any additional costs with regard to implementation of revised policies/procedures on Student Protection (Anti-Bullying).

Again, I am sorry for the delay. I hope the information is helpful; please call let me know if you have additional questions.

Mark



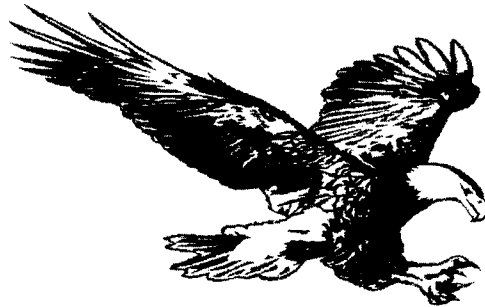
Forward Thinking. High Achieving.

Mark Thane, Executive Regional Director
Missoula County Public Schools
215 South Sixth ST W
Missoula, MT 59801
(406) 728-2400 ext 7021
mthane@mcps.k12.mt.us

Fairfield Public Schools

Fairfield High School
Elementary/JH
P.O. Box 399
13 7th Street
Fairfield, MT 59436

Les Meyer, Superintendent
Principal
Dustin Gordon, 7-12 Principal
Athletic Dir.
PH: 406-467-2528
Fax: 406-467-2554



Fairfield
P.O. Box 399
13 7th Street
Fairfield, MT 59436

Courtney Bake, K-6

Mike Schmidt,

PH: 406-467-2425
Fax: 406-467-2554

Date: August 9, 2012
To: Mr. Robert Miller
From: Les Meyer, Superintendent of Fairfield Public Schools
Re: Fiscal Analysis of the proposed amendments to Chapter 55 Standards of Accreditation.
Addressing the questions for amendments to Chapter 55

First of all I would like to begin by stating that schools are on board with Montana Common Core Standards (MCCS) and what Chapter 55 seems to be doing for education. My complaints or issues that I have don't deal with the changes, but more along the reasons for the changes. I do not know an educator that does not want to do what is best for students. There are many passionate educators in the state of Montana that want is best for students; where people get wore down is the constant bombardment of negative press regarding education. When and where do the good stories get to be told? No one discusses how teachers bring clothes from home to give to students who are in need. Where is the press discussing teachers buying their own school supplies? What about the students that have poor home lives, but they come to school because they are around people who care about them, they are treated with respect and pushed to expand their knowledge, etc? Then we are told we are doing a bad job and we need to change.

Fairfield Schools is all in on what the MCCS are bringing to the table in terms of educating kids. I want you to know that the cost has not been great or insurmountable at this time; however, time is what has been spent. So maybe there has been money spent. I and our school have spent over 44 hours preparing for the MCCS. The time has been spent on collaboration as well as attending workshops etc. We need to attend and be brought up to speed on the requirements and teaching strategies. I need to say there is good, viable information available. We will be attending conferences, workshops, and setting aside collaboration time for the next two years to get on board and do the best job we can possibly do to fulfill the requirements of MCCS.

Teacher/Principal evaluation is crucial to the success of schools. We are all for holding teachers and principals accountable. This will take time to train both teachers and principals in this process of change. Change is good in cases and if this will improve student achievement then again, we support this. My question regarding the evaluation process revolves around the students. How are they to be held accountable? We believe in multiple measures of evaluating student achievement. Right now, when students take the Criterion Reference Test (CRT) they have no reason to do well. The CRT does nothing for them. The ACT, SAT, MUSWA are assessments that mean something to students. Right now, we want students to have pride and do well for the sake of doing well, but the bottom line is they have really no vested interest in the CRT.

Our business manager has spent 25 hours on the Development of the Data Collection for Terms of Employment and the Compensation Expenditure Report. She has volunteered our school as a pilot school and we are not quite half way through the process. Much of her time has been spent collaborating with the Office of Public Instruction and the software company. We have been told by Joan Anderson from OPI that several schools who piloted this process have since dropped out. My concern with this is that she needs to take vacation time; this is not anyone's problem, but the Fairfield School District's. What I mean by this is that she is at the point with so much leave time accrued that should she leave or retire that it would cost our school district a great deal of money. No one thinks of these issues with the exception of those of us involved in education within the school buildings. Now, she is a great employee and will do the best she can to help the school district in every possible way.

Currently, Fairfield Schools performs teacher mentoring in an informal basis. We do not have a formal mentoring program set up. We are holding a new teacher orientation day on Thursday, August 23rd. Teachers, community members, cooks, and office staff will be volunteering their time. If we had to pay them, we would not be able to hold an orientation day and be as thorough as we will be on the 23rd. With that being said can you imagine how professional we could be if we were provided funding to orient new staff members?

The only numbers I can truly quantify are the following:

Average teaching wage:	\$225.00
Sub Pay:	\$70.50
Motel rooms for conferences:	\$75.00-\$125.00
Gas:	\$3.50/gal
Meals:	\$18.00 a day

Fairfield Schools is in support of the changes to Chapter 55. We want to do what is best for students. I am excited for these changes to take place. Change does not come easy and quickly to schools or any business. Nor does change come cheap – time and money are major factors in change. We are in support of this endeavor, but we to want support with time, money, and understanding.

Thank you.

Email from Centerville Schools 8/13/2012

Morning Robert,

I have to apologize about not having time to get the specific information you are requesting. What I can tell you is that with the Chapter 55 changes proposed, there will be a financial impact on our District and all the Montana school Districts. We can only absorb so much, then we have to start cutting services to our students. It is a rob Peter to pay Paul scenario. Rural Montana schools struggle to get by from year to year as it is. To impose more unfunded mandates only hurts our schools.

Yours in Education,

Dennis Gerke, Supt. Centerville Schools

OFFICE OF THE SUPERINTENDENT

Dillon Elementary School District #10

22 N. Cotton Drive

Dillon, MT 59725

406-683-4311

Robert Miller, Fiscal Analyst
Legislative Fiscal Division
Montana State Capitol Bldg., Room 110G
PO Box 201711
Helena, MT 59620-1711

RE: Cost of amendments to Chapter 55 Standards of Accreditation

Dear Mr. Miller:

First of all let me apologize for not getting you this information sooner. We have been moving our offices to our new location over the past month and somehow "your" survey must have gotten misplaced. Again, I am sorry for this oversight and, with that being said, I offer to you the following "educated guesses".

Estimated costs with regard to the changes to 10.55.606:

- In anticipation of this change we have adopted a new math series to better align with the Common Core – Cost \$80,000
- Curriculum rewrites to align with Common Core in Math and Language Arts (both of which had recently been rewritten/adopted) - \$5,000
- Last year we spent about \$2500 on professional development activities designed to make our staff aware of the changes coming down the pipe. As our students are performing at a high level already, we will likely not alter our plans for professional development too much but have set aside another \$3000 just in case.
- As we anticipate much of the "testing" that will be required of these changes to be "technology based," we spent nearly \$100,000 this summer upgrading our technology infrastructure and hardware.
- Administrative costs related to these changes are hard to gauge at this time...hopefully they will be minimal...at least as far as this section goes.

Estimated costs with regard to the changes to 10.55.701 (4), (5):

- It is very difficult to anticipate the costs related to these changes. However, we will have to scrap our current evaluation tool and work with the local teachers' union to come up with one that fits the new framework. Hard to put hard numbers to this, but the time commitment is likely to be huge.
- Once instrument is developed, I anticipate \$8000 to \$10,000 in professional development costs, training teachers and administrators about how the instrument will be used and what its requirements are.
- A new tool for evaluating administrators will also need to be developed and tested. Hard once again to put a hard cost on this, but this too will take hours and hours. **Time that should be devoted to making things better for children.**
- We do not currently have an induction program because School District #10 always has several applicants for whatever position we advertise (113 apps for 4 openings this year). To require such would seem ludicrous. I anticipate the cost of a required mentoring program to be \$2000 per year per new staff. In other words this year it would cost the district \$8000 as we have 4 new teachers on staff.
- Professional development costs related to a mentoring program would likely be in the \$5000 range.

Estimated costs with regard to the changes to 10.55.719:

- Revising policy - \$500

- Revising student and staff handbooks - \$3000 in printing costs
- Development and implementation of various procedures – Hard to put a dollar figure on this one too. Hours and hours will be needed. Parent, staff, and student groups must be brought to the table and given input in the development of these procedures in order to establish “buy in” by everyone involved. Another huge time commitment which, in our case, again seems ludicrous. We are strongly involved in the Montana Behavioral Institute (MBI) and, due to MBI, we have already established procedures that work well for us. It is likely that our current procedures won’t exactly match the requirements of this change, so even though they work, we will need to put in the time to “meet the mandates from above.”

In closing, it is my opinion that the money that will be spent implementing these changes could be better spent helping kids. I have been a Montana educator since 1978, have seen change after change come and go, and wonder how long it will be until these “proposed changes” are deemed obsolete? We can then, once again, spend more money and more time implementing another, “good idea”.

Sorry for venting on you Bob! Thanks for the opportunity for input. Good luck.

Sincerely,

Glen A. Johnson

Glen A Johnson, Ed. D.

“When you walk with purpose, you collide with destiny.” - Dr. Bertice Berry

July 30, 2012

Robert Miller
Fiscal Analyst
Legislative Fiscal Division
Montana State Capitol Building
Room 110G

Dear Robert

After reviewing the questions concerning Chapter 55 Standards of Accreditation, I would estimate the following incremental costs:

Staff Evaluation and mentoring

- 1) Professional Development for teachers and principals \$500 per year
- 2) Admin costs \$0
- 3) Other costs (Montana School Board Association policy review) \$3,500 one-time fee

Student Protection Procedures

- 1) Development of New Policies and Procedures Attached to MSBA Review fee.
- 2) Administrative costs \$0
- 3) Professional Development \$ 500 per year

The MSBA Policy review is not mandatory, but the service would be well worth the cost to make sure that our school policies, handbooks, CBA, etc. are legally sound and up-to-date. If money is going to be made available to schools to implement the Chapter 55 Standards of Accreditation, I would highly consider using it toward policy review/update.

Sincerely

Loren Dunk, Superintendent
Power Schools

July 30, 2012

To: Robert Miller, Fiscal Analyst, Legislative Fiscal Division

Fr: Mary Johnson, Superintendent
Browning Public Schools

Re: Fiscal Analysis of the proposed amendments to Chapter 55 Standards of Accreditation.

Changes to 10.55.606 (Standards of Accreditation)

In addition to assurance standards accreditation will also depend on student performance. Student performance will be based on:

- Math average scores for all students' grades 3-8 and 10th.
- Reading average scale score for all students grades 3-8 and 10th.
- Science average scale score for all students grades 4, 8, and 10
- Graduation rates for high schools.

In regard to these changes, what expenses will your schools incur related to

It is imperative that the Board of Public Education and Legislature are aware that this is an issue of Equity. Schools with high concentrations of children living in poverty (primarily Indian reservations) will require additional resources to "level the playing field" if expected to meet the same academic standards and graduation rate as every other school in the state

1. Professional development to increase student performance

Professional Development to implement new programs and to provide ongoing coaching and implementation monitoring \$100,000

2. New programs or changes to existing programs designed to improve student performance

4 pre-school teachers @ \$50,000	200,000
5 math instructional coaches (1 per school) @ \$70,000	350,000
5 reading instructional coaches @ \$70,000	350,000
5 certified math tutors @ \$50,000	250,000
New Math curriculum K-12	180,000
Supplemental reading and writing curriculum	100,000
Online assessments in math and reading K-12	100,000
Technology for student learning	100,000
District curriculum coordinator/RTI Specialist	70,000
Dropout prevention specialist	50,000

Administrative costs

Other costs

Recruiting and retaining quality teachers and principals 250,000
(will likely mean salary increases)

Total to meet performance standard \$2,100,000

Rob,

Here's what we came up with for MSDB. It's easily over \$23,500 for our school if we do it right. And right now we don't have a dime for any of this.

As an aside this year we'll be implementing evaluation of sign skills for all staff over a three year period at a cost of around \$14,000 the first year. This requirement has been in statute for more than 30 years but we're just now formally addressing. We don't have any money for this either and it didn't need to be done because the law says we do it, it needed to be done because we can't recruit most staff that already are proficient signers. And this is the only way to force the administration and the school to provide comprehensive professional development and training to ensure that all new staff develop the proficiency needed to be able to communicate effectively with deaf students who are ASL users.

I think there are parallels between this and chapter 55. But the deal is that we anticipate it's going to cost close to \$25,000 over three years just to do the evaluations. We don't know how much professional development we're going to have to provide. But if just 1/3 of the staff doesn't meet proficiency targets required under our board policy, and we provide just 8 hours of paid training (which is nowhere near enough to make someone a proficient user of ASL) that's an addition \$6,500/yr. And that's a cost that will be with us forever because our turn-over is close to 10% and the period allowed by the policy for developing proficiency is three years.

Take care and hope your summer is going well.

Steve

Changes to 10.55.606 (Standards of Accreditation)

3. Professional development to increase student performance

First year costs - \$30/hr/8 hrs/ 25 staff - \$6000

4. New programs or changes to existing programs designed to improve student performance

Unknown at this time

5. Administrative costs

First year costs - \$35/8 hrs/3 staff - \$840

6. Other costs

Unknown at this time

Changes to 10.55.701 (4), (5) (Staff Evaluation and Mentoring)

1. Professional development (Teachers, Principals and any other administrative staff).

\$30/hr/4 hrs/25 staff - \$3000

2. Administrative costs

\$35/hr/16 hrs/3 staff – \$1680

3. Other costs

Evaluation tool development committee

\$30/hr/20 hrs/8 staff - \$4800

To comply with the new rules:

- Will your district be able to keep the current evaluation instrument, or need to modify or adopt a completely new instrument all together? We will need to develop a new instrument. With any of these possibilities, will your district have to provide professional development to both teachers and principals (who will be doing the evaluations in most cases). Both teachers and supervisors will need professional development on the new process/instrument.
- Is your current teacher evaluation process included in your district's collective bargaining agreement? The evaluation procedure is discussed in the collective bargaining agreement in terms of Board policy. The specific tool is not. The Board policy may need to be modified to reflect the new evaluation tool. How will this impact those agreements? I don't believe the new instrument/procedure will be impacted by the collective bargaining agreement.
- Does your district currently have a mentoring and induction program? We no formal or policy delineated mentoring program designed to meet the current teaching standards. Will you need to modify or create a mentoring and induction program and what cost will be associated with these changes? We will either need to adopt an existing plan from another school and modify it or develop our own plan. Anticipated costs for either would be similar but if we were to develop a program it's assumed the cost would be \$30/hr/24 hrs/ 6 staff - \$4320

New Rule 10.55.719 Student Protection Procedures (Anti-Bullying)

1. Development of new policies and procedures

\$40/hr/8hrs - \$320

2. Administrative Costs

\$25/hr/4hrs - \$100

3. Professional Development

\$25/hr/1 hr/115 staff - \$2875

BAINVILLE PUBLIC SCHOOL

Dennis Nelson
Chairman


Lee Abbott
Clerk

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Phone (406) 769-2321 FAX (406) 769-3291

Renee Rasmussen
Superintendent

Rhiannon Beery
Principal

Lyanna Gable
Secretary

DATE: July 27, 2012
TO: Robert Miller
Fiscal Analyst
Legislative Fiscal Division
Montana State Capitol Building
Room 110G
406-444-1795
FROM: Renee Rasmussen, Superintendent 
RE Questions for amendments to Chapter 55

#1 Changes to 10.55.606 (Standards of Accreditation)

Because Bainville is located in the Bakken Oil Discovery area, students go in and out of the school with little more than a morning's notice. Having district to be required to test a student that may not have had even a day in the district, and the district be charged with the performance of that student, is a mandate that the district has great difficulty with. In order for Bainville to meet the demands of increased student performance when a greater and greater portion of our student body has not been educated here, we will need to have in place extensive programs for incoming students to remediate them in any area necessary. Those remediations may simply be because of a different schedule of classes (i.e. Algebra as a sophomore and Geometry as a freshman rather than the other way around). This will required additional staff, who at the very least, will be paid to watch students take Montana Digital Academy classes. To find even an Aide to watch such a class in an area where the average wage is \$90,000 per year, will require a minimum of \$12.00 per hour. The minimum that will cost the district is \$18,000—for one aide.

Additional aides may be required to work with K-8 incoming students such as we have been seeing—a more migrant student—who often has holes in their education from moving around. To meet Reading, Math, and Science scores could require one aide in each area for a total of \$54,000. None of these aides are licensed teachers and thus would require oversight by a teacher, and additional expense, require the purchase of additional programs.

Because Bainville is so far in the northeastern corner of Montana, costs for professional development are extremely high. It is preferable that teachers be able to travel to targeted professional development so that they can both learn from the best available and can interact with peers. Even a trip to Billings requires a motel room and 5-6 hours of travel the day before an event. If an event ends at the end of the day, the teacher will need to travel home, not getting home until at the earliest 9 at night. With subs, travel, motel, etc. professional development is costly. One teacher leaving for one day of professional development in Billings costs \$250 for a sub, \$100 for a motel room, \$32 for food, and about \$100 for fuel for a total of over \$500 just in travel.

#2 Changes to 10.55.701 (4), (5) (Staff Evaluation and Mentoring)

Many small schools, including Bainville, do not have a mentoring program. Again, the training to develop mentors would be costly as that training is typically available only in Billings or Helena. While we have an informal mentoring system, nearly every staff member already soes

several jobs, making a mentoring program something that many teachers would not be willing to do. In a staff of fewer than 20, we have five new teachers this year. Because we are so far removed from Montana's populated areas, teachers often choose not to stay here because of the isolation. That means that teacher turnover can be quite great. We estimate that training five staff members (if we can find that number who are willing) to be mentors will cost close to \$10,000—that will cover travel, meals, stipends, and hotels for several days in Helena.

The requirements for evaluation will also mean additional training, development, and implementation which will be costly for this district. This will mean additional negotiation meetings among staff, administration, and board as well as training for the principal (I assume in Helena) at a cost of about \$200 per day plus salary and materials.

To be able to evaluate teachers based on the new system will also require that schools provide ample training for teachers. This will mean additional costs for professional development. For a staff of 19, even two days a year—traveling—again we will use Billings—will mean costs of \$500 per day if done during the year. That cost amounts to just under \$10,000 for each day if teachers attend content specific, targeted training.

Thank you for giving me the opportunity to speak to these new requirements.

I find that what will work in a state the size of, say New Hampshire, or even North Dakota is not realistic in Montana. And further, the rules are often made with the assumption that needed training will be done in Helena so training staff will not have to bear the cost of travel. Unfortunately, that means that school districts will have to pony up for those costs. When it is a ten hour drive from the district to Helena, as it is for Bainville, the costs escalate quickly. I see nowhere that additional funds are made available based on costs for districts to comply with these new rulings.



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 Billings Public Schools
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Date: July 30, 2012

TO: Robert Miller, Fiscal Analyst, Legislative Fiscal Division

FROM: Terry Nelsen ^{TNB} Bouck, Superintendent, Billings School District

RE: Fiscal Analysis of the Proposed Amendment to Chapter 55 Standards of Accreditation

I appreciate the opportunity to provide the potential impacts of the proposed amendments to Chapter 55 Standards of Accreditation to the Board of Education. We have attempted to itemize each area of focus and provide total costs for each area of analysis.

Finally, I have provided the cost in order for the Billings School District to fully comply with Montana State Accreditation Standards prior to the proposed amendment to Chapter 55. This is in response to the action taken by State Superintendent Denise Juneau and the Montana Board of Education placing the Billings School District in Stage 2 and intensive support for the current accreditation standards. Please don't hesitate to call me should you have questions.

Fiscal Analysis of Proposed Amendment 10.55.606 Increase Student Performance

Billings Public Schools will need to update curriculum, provide professional development, and purchase materials to meet the needs of our students and increase their performance in math, English, language arts and science. Though Billings Public Schools has started the process by adopting the Montana Common Core, a tremendous amount of work will need to be done in order for our students to be college and career ready.

	District Work	Total
Curriculum Work	ELA—Elementary; 7 grades (K-5) x 4 teachers x 3 days x \$70 = \$5,880	
	9 grades (K-8) x 2 teachers x 16 hours x \$25.23 = \$7,267	\$13,147
	ELA—High School: 9 teachers x 30 hours x \$25.23 = \$6,812	\$6,812
	Literacy standards for other subjects—Grades 6-12: 25 teachers x 8 hours x \$25.23 = \$5,046	\$5,046
	Math—Elementary: 6 grades (K-5) x 2 teachers x 8 hours x \$25.23 = \$2,422	
	3 grades (6-8) x 4 teachers x 16 hours x \$25.23 = \$4,844	\$7,266
	Math—High School: 9 teachers x 30 hours x \$25.23 = \$6,812	\$6,812

	Science—Elementary 7 grades (K-6) x 4 teachers x 3 days x \$70 = \$5,880 2 grades (7-8) x 4 teachers x 3 days x \$70 = \$1,680 9 grades (K-8) x 2 teachers x 16 hours x \$25.23 = \$7,267	\$14,827
	Science—High School: 9 teachers x 30 hours x \$25.23 = \$6,812	\$6,812
Professional Development	Train one teacher per building as a lead facilitator: 30 teachers x 8 hours x \$25.23 = \$6,055	\$6,055
	Train all elementary teachers in effective practices in English language arts: 369 teachers x 3 x \$70 = \$77,490 Middle School: 25 teachers x 3 x \$70 = \$5,250	\$82,740
	Train all elementary teachers in effective practices in math: 369 teachers x 3 x \$70 = \$77,490 25 teachers x 3 x \$70 = \$5,250	\$82,740
	Train all elementary teachers in effective practices in science: 369 teachers x 3 x \$70 = \$77,490 25 teachers x 3 x \$70 = \$5,250	\$82,740
	Train all middle school content area teachers in effective practices in literacy 32 teachers x 3 x \$70 = \$6,720	\$6,720
	Train all high school English teachers in effective practices in English language arts: 46 teachers x 3 x \$70 = \$9,660	\$9,660
	Train all high school math teachers in effective practices in math: 46 teachers x 3 x \$70 = \$9,660	\$9,660
	Train all high school science teachers in effective practices in science: 46 teachers x 3 x \$70 = \$9,660	\$9,660
	Train all high school content area teachers in effective practices in literacy: 189 teachers x 3 x \$70 = \$39,690	\$39,690
	Cost for bringing in trainers/speakers for professional development in English language arts	\$25,000
	Cost for bringing in trainers/speakers for professional development in math	\$25,000
	Cost for bringing in trainers/speakers for professional development in English language arts	\$25,000
	Resources/ Materials/ Textbooks	ELA—Grades K-5: District's primary reading resource is 12 years old. It is beyond supplementing. Primary resource for 7,122 students = \$1,068,300
ELA—Grades 6-8: With alignment between 6-8 grades, a new resource will be necessary. Primary resource for 3,533 students = \$529,950		\$529,950
ELA—High School: supplementary resources = \$250,000		\$250,000

Great Falls Public Schools Cost Analysis for Implementation of Chapter 55 Accreditation Updates

Great Falls Public School District (GFPS) is committed to implementation of the accreditation standards including the Chapter 55 revised standards. Many of the newly revised standards for accreditation have already begun being implemented in Great Falls; and the district has already begun initiatives that align with these revisions, e.g., 1) the adoption of the state standards for common core mathematics and English language arts, the new science inquiry standards, and the Graduation Matters initiative for Montana; 2) the revision of the district's outdated teacher evaluation system through the addition of a technology supported walkthrough system, and the collaboration with the Human Resource Office and the staff to research other models including InTASC, Danielson, and Marzano; 3) the anti-bullying issues are being addressed through district-adopted initiatives such as the OLWEUS Anti-bullying Program, Montana Behavior Initiative and Rachel's Challenge.

	Description	Cost
10.55.606 – Student Performance	Professional development to increase student performance.	This is an ongoing priority for GFPS regardless of the Ch 55 changes. Currently, GFPS budgets about \$100,000 annually for its teacher professional development programs.
	New programs or changes to existing programs designed to improve student performance.	GFPS has previously submitted estimated costs for implementing the new Common Core standards. For purposes of this Ch. 55 cost estimate, we are not including those costs related to regular curricular review and update.
	Administrative Costs	NA
	Other Costs	NA
Total for Student Performance		\$ 100,000

	Description	Cost
10.55.701 (4),(5) – Staff Evaluation & Mentoring	Will your district be able to keep the current evaluation instrument, or need to modify or adopt a completely new instrument all together?	Ch. 55 standards require evaluation system changes. GFPS began the process to change its evaluation system in school year 2011-2012 as improvements in instruction already demonstrated the need for updated evaluation.
	Will your district have to provide professional development to both teachers and principals	Yes. An estimate of \$20,000 will be needed for contracted services and

**Great Falls Public Schools Cost Analysis
for Implementation of Chapter 55 Accreditation Updates**

		additional staff time.
	Is your current teacher evaluation process included in your district's collective bargaining agreement? How will this impact those agreements?	The process is in the current collective bargaining agreement, but not the tool. The process is written in such a way that it will not be affected by Ch. 55 requirements. Administrative Costs to develop the new teacher evaluation process: include 20 staff for approx 160 hrs at \$20 per hour for two years, or \$6400 to develop the new evaluation system.
	Does your district currently have a mentoring and induction program? Will you need to modify or create a mentoring and induction program and what cost will be associated with these changes?	Yes, but recent budget cuts have forced the district to scale back mentoring services. Currently the program costs \$30,000 annually. To go to full program would add 2 coaches at \$90,000 and mentee time (at \$20/hr for 12 hrs/yr x 70 tchrs) \$16,800.
	Other	Purchase software system and train. \$40,000
	Total for Evaluation and Mentoring	\$ 203,200
	Description	Cost
10.55.719 – Student Protection Procedures (Anti-Bullying)	Development of new policies and procedures	NA – GFPS adopted bullying policy in 2007
	Administrative Costs (Materials) Year 1	\$ 35,000
	Professional Development Year 1-2	\$ 55,300
	Total for Anti-Bullying	\$ 90,300
Total dollars for Implementation of Ch. 55		\$ 393,500