

**Board of Public Education**  
**Public Comment**  
**March 2024**

**1. Charles Palmer**

Missoula, MT

I email today to express my lack of support for certifying teachers through online certification programs. Student teaching is a vital component of learning how to become an effective educator, and the fact that it is not required in these programs is quite problematic. Also, Montana does not have an issue with certifying enough teachers. We have a problem with teacher pay. If you are going to look at the shortage of teachers in Montana schools, please address the dismal pay our educators earn. Thank you for your attention to this matter.

**2. Rhonda Remsen**

School Psychologist

I am writing to ask that you not approve the changes proposed to this Administrative Rule, specifically sections 10.57.432, 10.57.434, and 10.57.102 as these changes would reduce the requirements and harm the integrity of the school psychology professional standards. Reducing requirements can negatively impact school districts and have possible legal ramifications in relation to special education needs.

Please keep the current licensing requirements for Montana school psychologists and do not approve of the changes to ARM Title 10, Chapter 57, Educator Licensure Standards. Students, their families, and Montana schools deserve well-trained professionals, and the language in the ARM proposal may negatively affect how services are provided, particularly for our most vulnerable populations: Montana children with disabilities and mental health challenges in rural areas with already limited resources. With the potential to negatively impact schools, reducing the licensing requirements for the state may also limit other opportunities to address shortages, like federal grants or the Interstate Compact for Schools, and negate the attempt at supporting school psychologist shortages.

The National Association of School Psychologists has worked tirelessly to establish appropriate standards for training programs and this includes rigorous internship opportunities. Having Montana's educator licensure standards reflect those of the National Association is critical.

**3. Dr. Karen Washburn**

Professor, MSU Billings  
Billings, MT

I am against ABCTe as an alternative teacher certification. MSU has online programs in place to help individuals take the required courses to become teachers. To effectively prepare educators to learn about pedagogy and instructional strategies they must take coursework beyond online certification. It is also paramount that teachers have authentic mentoring experiences such as student teaching and junior field. I believe that our society does not value the role of teachers and equates this profession as something that anyone can do after taking limited certification. I also think that there will be a higher turnover in teachers due to a lack of proper preparation. Please do not implement ABCTe as an alternative teacher certification.

**4. Tricia Seifert, PhD**  
Bozeman, MT

My name is Tricia Seifert and I am a Montana educator within a public higher education institution and provide leadership to one of the state's Educator Preparation Program.

[SB 373](#) passed during the 2023 MT Legislative session and established alternative teacher credentialing in Montana. This provides a pathway for entities outside of institutions of higher education to prepare teachers who can then apply for Class II teacher licensure in Montana.

Superintendent Arntzen has recommended that the Board of Public Education approve [ABCTE](#) [[americanboard.org](http://americanboard.org)] (also known as American Board), an online teacher certification provider, per [ARM 10.58.802](#) as noted on Page 150 of [this document](#). The agenda item is discussed at 2:13:42 on this [video here. \[youtube.com\]](#) The recommendation includes provisional approval for all areas of endorsement that ABCTE seeks.

In the video, the presenter from ABCTE cites the lack of availability of programs to meet the interest of bachelor degree holders who wish to change careers and become teachers. While that may be true in other ABCTE jurisdictions, both MSU and MSU-B provide online master's degrees that result in recommendation for initial teacher licensure. Moreover, UM-Western and UM have vibrant post-bacc options.

I outline my main concerns about the Superintendent of Public Instruction's recommendation to the Board of Public Education to approve ABCTE as an alternative teacher certification provider below.

Background and Issues.

Administrative Rule of Montana articulates the Professional Educator Preparation Program Standards in 10.58. Whether the alternative teacher certification provider is an institution of higher education or alternative entity, it should follow these standards delineate the minimum requirements any alternative teacher certification provider or Education Preparation Program must follow.

To that end, 10.58.312 clearly documents expectations for initial clinical partnerships and practice. ABCTE, as a provider, has no required provision for clinical partnership. This is in violation of 10.58.312

ABCTE has provided documentation of a third party's review of their proprietary examinations with the third party finding substantial alignment with INTAsC. It is not clear the OPI has completed an independent review of these proprietary examinations nor has evidence been provided that the proprietary examinations align with subchapters 4 and 5 of the PEPPS.

Ch. 10.57.301 details endorsement information and was substantially revised, approved and went into effect in late May 2022. Recently revised rule in 10.57.301 prohibits the PRAXIS subject Assessment for "early childhood (P-3), elementary education (K-8), reading (K-12), English as a second language (K-12); School Administrator (Superintendent, Principal, or Supervisor); Specialist (School Psychologist or School Counselor); and initial endorsements in Special Education fields." Approving ABCTE in any of the endorsement areas stated above violates the spirit of 10.57.301. Although the PRAXIS subject assessment is specified in rule, it is logical to infer the intent of the rule as stated is to prevent obtaining endorsement through test-based assessment in areas working with the most vulnerable populations (children enrolled in P-3, children enrolled in K-8, English language learners, children in

need of support provided by a school psychologist or school counselor specialist, and children entitled to special education services as provided by the federal IDEA law.)

I encourage the Board of Public Education to apply consistently the administrative rules within their oversight.

Thank you for your time and consideration of my comment.

**5. Joye Kohl**

Bozeman, MT

As a relatively new (actually returned) Montana resident with an abiding concern for the importance of quality public education of our youth (the future leaders of this state), I am very concerned about the proposed use of ABCTE for the credentialing of teachers – especially in the areas of elementary education (P/K-8), special education, reading, and school psychologist/counselor support services. Students in those areas are especially vulnerable and need the very best instruction to help meet their needs. I understand the teacher shortage issue, however, I do not believe that justifies lowering the teacher credentialing requirements to be met only with an online program. I know that the existing administrative rule for Montana spells out professional educator preparation standards. I have visited and explored the ABCTE website and the claims made, but believe that Montana’s history of excellence in the training of teachers by our state institutions with hands-on classroom experience remains the better option. A more appropriate way to address teacher shortages would be via salary improvements and addressing housing issues. Please be sure that the Board decisions (1) carefully delineate all teacher preparation requirements and are consistently applied to policies for all entities and (2) have been made following independent and thorough evaluation/reviews of the teacher education credentialing programs.

**6. Jon Konen**

Columbia Falls, MT

My name is Jon Konen and I am currently the principal of Columbia Falls High School. I am writing in support of the revision of 10.57.432, and the subsection that is highlighted below under (2)b. I propose removing the following wording, "of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.435." This would allow schools to hire individuals that have been approved in a counseling program sooner than waiting for them to complete all but 4 courses. As you know we have a counselor shortage across the state. It is extremely difficult to hire as well as recruit a teacher from within (or anyone with a degree) if they have to wait 2+ years in order to be 4 or less deficiencies away from completion. Thank you for your consideration at the March 18 Board of Public Education meeting.

**7. Leigh Lindstrom Clausen**

Columbia Falls, MT

My name is Leigh Clausen and I am currently a Library Paraeducator at Columbia Falls High School. I am writing to share my support of the revision of 10.57.432, and the subsection that is highlighted below under (2)b. I propose removing the following wording, "of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.435."

This change in verbiage would allow schools like mine to hire individuals that are in a counseling program but are more than 4 credits from completion. Given the shortage of school counselors in our state - and the dire need for these forms of support systems to remain available - I believe opening the candidate pool to students who are not quite to that arbitrary limit of four credits would provide administrators with a broader array of potential counselors to select from. The cost of living in our region is exorbitant and the likelihood of being able to attract potential quality applicants to our area from out of town is low.

This proposed amendment would allow people from within our district, who are passionate about public education and dedicated to helping students, but do not meet the current requirement to throw their hats in the ring for positions opening right now.

I sincerely hope you will consider this proposed change to allow for more choice, opportunity, and growth potential for Montana's next generation of school counselors to step into these vital and vacant positions. Thank you for your consideration at the March 18 Board of Public Education meeting.

**8. Ashleigh Mason**  
Columbia Falls, MT

My name is Ashleigh Mason and I am currently a school counselor for Columbia Falls High School. While I am in my third year at CFHS I have been a school counselor for 10 years now. I am writing in support of the revision of 10.57.432, and the subsection that is highlighted below under (2)b. I propose removing the following wording, "of being within four course deficiencies of completing full requirements as outlined in ARM 10.57.435." This would allow schools to hire individuals that have been approved in a counseling program sooner than waiting for them to complete all but 4 courses.

As I am sure you are aware, the State of Montana is in an educator shortage, especially when it comes to school counselors. Changing this verbiage would allow schools like mine to open up the applicant pool to those who are eager to become a school counselor by educators who are already active within our district. As the cost of living has continued to increase over the last few years it has become more and more apparent that the chances of attracting applicants from other areas are low.

As we know the state of Montana also experiences a higher than average suicide rate. According to Youth Risk Behavior Survey data 13% of Montana students attempted suicide during the 2022-2023 school year. This is a sharp increase in Montana...the highest percentage in 20 years. This data shows how vital having school counselors are and not open/empty positions. This change would directly help students in the state as it would allow districts to hire educators who are already actively pursuing a school counseling degree and who have shown dedication and empathy to the students we serve.

I sincerely hope that you will consider this proposed change so school districts from across the state could allow for more choice when it comes to our applicant pool. Thank you for your time and consideration at the March 18 Board of Public Education meeting.