

# CERTIFICATION STANDARDS & PRACTICES ADVISORY COUNCIL SPECIAL MEETING MINUTES

NOVEMBER 3, 2021  
Montana State Capitol Building, Room 317

## Starting at 3:00 P.M.

### CALL TO ORDER

Chair Elder called the meeting to order at 3:04 PM. The Pledge of Allegiance was read, and Ms. Stockton took Roll Call. The Chair read the Statement of Public Participation and welcomed guests.

Council Members Present: Mr. Kelly Elder, Chair; Ms. Teresa Marchant, Vice Chair; Dr. Kate Eisele; Dr. Rob Watson; Ms. Barbara Brown; Dr. Trent Atkins. Staff present: Ms. McCall Flynn, Executive Director; Ms. Kris Stockton, Administrative Specialist. Guests present: Dr. Julie Murgel, OPI; Ms. Crystal Andrews, OPI; Ms. Sharyl Allen, OPI; Dr. Ann Ewbank, MSU; Ms. Tristen Belknap, OPI; Dr. Beverly Chin, UM; Mr. Dennis Parman, MREA; Ms. Virginia Diaz, OPI; Ms. Emily Dean, MTSBA; Mr. Fletcher Brown; Ms. Jule Walker, MTSBA; Dr. Kirk Miller; SAM; Ms. Kristi Steinberg, UM; Ms. Tracy Moseman, OPI; Ms. Sharon Carroll; Ms. Sarah Swanson, OPI; Mr. Michael Sweeney, OPI; Ms. Tammy Lacey, Chair, BPE; Ms. Jane Hamman, BPE member.

### APPROVE AGENDA

*Dr. Trent Atkins moved to approve the agenda as presented. Dr. Kate Eisele seconded the motion.*

*No discussion. Motion passed unanimously.*

Prior to beginning the review, Chair Elder introduced Deputy Superintendent of Public Instruction Sharyl Allen. Ms. Allen introduced the OPI team who will be going through the revisions and answering Council member questions.

Chair Elder thanked the Task Force and the Feedback group who both worked tirelessly on the proposed revisions before the Council today.

### ITEM 1      REVIEW OF REVISIONS TO ARM TITLE 10, CHAPTER 57, AND RECOMMENDATION TO THE BOARD OF PUBLIC EDUCATION – ACTION Dr. Julie Murgel, Crystal Andrews

Dr. Murgel reviewed the members of the Task Force and discussed the review process, areas of the rule which were revised, and why the revisions were made. Dr. Murgel answered Council member questions.

Dr. Murgel reviewed the proposed revisions to the Class 1, 2, and 5 licenses with the Council and answered Council member questions regarding the proposals, specifically around the PRAXIS requirement and the need for definitions for “Student Teaching Portfolio” and the GPA requirement.

Council members asked for clarification of the review process and the timeline. Ms. Allen pointed out that the review by CSPAC will be included in the proposed revisions to the Superintendent. The Board of Public Education will be presented with the information and that OPI anticipates a final document to the Board by January or March to begin the Administrative Review Process.

Ms. Crystal Andrews, Educator Licensure Manager at OPI, began by going through each revision in the document reviewing how the current rule reads, what the proposed revision is, and what the vote was from the Task Force for the revision. Dr. Murgel and Ms. Andrews answered Council questions on each revision.

10.57.102 Definitions – questions about the process for reviewing applications and the phrase “approved and accredited by a state board of education or state agency” and if that allows for alternative pathways to licensure from out of state. Discussion also around the newly defined “Mentorship and Induction Program”.

A question was posed as to whether the new phrase “Professional Development Units” is defined. ARM 10.55.714 defines what activities can be used for Professional Development so that rule will need to be changed in Chapter 55.

Questions surrounding the newly proposed rule for reciprocity for Military Spouses were discussed. It was noted by OPI that other states are taking up this issue as well because military families are moved frequently and not by choice. If they are licensed in another state Montana would automatically give a license to the military spouse. Concerns were voiced by the Council some educators may potentially be licensed in Montana simply because they are a military spouse without meeting normal qualifications.

A lengthy discussion ensued regarding the proposal, which is not going to the Superintendent, for an addition for granting additional endorsements for Class 1 or 2 licenses by presenting a passing score on the PRAXIS for the endorsement area.

A discussion around the counselor to administrator pathway created in 10.57.413 took place, with a discussion that school psychologists may also be in the same situation.

A discussion about removing some of the pieces in the Class 8 application was held. A question was asked as to why the applicant shouldn't have to demonstrate the criteria. The argument is that there is a good amount of repetition in providing that information, and that it's being demonstrated in other ways and other areas of the application.

The Council discussed whether “credible source” should remain in the rule. The question of whether “credible source” should be defined, and should it be defined in rule, similar to the definitions of “Immoral Conduct” in ARM 10.57.601A. The Chair agreed that since “immoral conduct” is defined, “credible source” should also be defined.

## **PUBLIC COMMENT**

See Appendix for written public comment submitted.

The following individuals gave in person public comment:

Mr. Dennis Parman, MREA, gave public comment regarding 10.57.416 and the history of that rule and why it was changed in 2016. After the rule was changed, it was realized that the rule was closed too tightly regarding school counselors and school psychologists.

Dr. Ann Ewbank gave comments on the revisions process, noting her concern that it has been rushed and important stakeholders have not been considered. Dr. Ewbank also stated concerns that the Council does not have a complete legal draft. Dr. Ewbank spoke in support of the tiered licensure system, and the mentorship and induction program, however, mentorship and induction are not defined in 10.55, Accreditation Standards. Dr. Ewbank referenced the mentorship and induction program at MSU and spoke in opposition to a pathway to licensure for alternative routes to licensure from out of state applicants, to add endorsements based solely on passing the PRAXIS, and for out of state EPP's to be held to a lower standard than Montana EPP's.

Dr. Beverly Chin, University of Montana, gave public comment on 10.57.301 regarding adding endorsements based upon the PRAXIS.

Mr. Dennis Parman spoke on behalf of MREA and the MT PEC association. Mr. Parman thanked OPI for their work. Mr. Parman spoke to ARM 10.51.104 which requires CSPAC to make recommendations regarding licensure to the Board and to seek legal advice on the rule. Mr. Parman also spoke to the proposed changes to 10.57.301 regarding endorsements and to remove “and”. Mr. Parman discussed the mentorship and induction program proposed in the revisions and the possibility of a license being held for not completing a mentorship and induction program, and that MTPEC does not believe that a tiered licensure system for Class 2 is the best idea. Mr. Parman also spoke to the PRAXIS requirements for out of state licensure and that should be reviewed for necessity. Finally, the three-year requirement for successful experience should be moved to one. Mr. Parman reminded the Council that locally elected boards of trustees play an important role regarding who is retained as teachers, and that a license is not an avenue to the classroom, that final decision lies with the local authority. (Written comments from MT-PEC are attached as Appendix)

Ms. Diane Fladmo, MFPE, gave public comment noting that she served on the Chapter 57 Task Force and noted that members worked diligently given the time allowed. Ms. Fladmo noted that 10.57.301 “and” or “or” did not reach consensus and Ms. Fladmo discussed the robust discussion the members had. Ms. Fladmo noted that she hopes the mentoring and induction piece moves forward but that work should be done with the EPP’s.

Ms. Jule Walker, MTSBA, Chapter 57 Task Force member, discussed the collaborative efforts of 10.57.601 regarding “credible source”. A recommendation was made to replace that with the County Superintendent that was not accepted. The recommendation now is to remove “credible source” and to leave the reporting with the local Board of Trustees. Ms. Walker then discussed MTSBA’s stance on the timeline of the revision process being too quick, and a lack of communication since the last meeting of the Task Force from OPI. Ms. Walker noted that the document has not been shared with the Task Force and that she only found out from others in the educational groups in the state. Concerns that a crosswalk between Chapter 55 and 57 has not been done, and clarification needed from OPI on the process and that mentorship and induction programs should not be contained in licensure rules because it can be a barrier to licensure. It is contained in Chapter 55 Accreditation Standards which is next in line to be reviewed. Ms. Walker also noted that one year of experience teaching in another state should be adequate for licensure, and to let the local school board determine who is best to teach the students in their district.

Dr. Kirk Miller, SAM, gave public comment. Dr. Miller is currently serving on the Chapter 58 Task Force and thanked the Council members for their service to the children of Montana, and to those who created 10.51.104 for the creation of CSPAC and for the important work they do. Dr. Miller also thanked Ms. Allen, Ms. Andrews, and Dr. Murgel for managing the Task Force. Dr. Miller echoed the comments of Mr. Parman and Ms. Walker. Dr. Miller supports the counselor to administrator pathway in 10.57.413 and the Superintendent endorsement recommendation in 10.57.414. Dr. Miller also noted the crosswalk between Chapter 57 and Chapter 58 work and that he has requested that for Chapter 58.

Ms. Tammy Lacey, Chair of the Board of Public Education and CSPAC Liaison for the Board, thanked the Task Force members for their hard work, and to the OPI staff for their work to get to this point. Ms. Lacey thanked all the public commenters for their careful and vetted comments, and thanked CSPAC for their work and their good questions.

Ms. Kristi Steinberg, University of Montana Licensure and Assessment Manager spoke to her previous involvement in ARM revisions, and that she was a member of the Licensure subgroup. Ms. Steinberg spoke in opposition to using the PRAXIS as the only measure to add endorsements in 5-12 grade levels, as were previous comments to this issue.

Questions from the Council as to what next steps are. Ms. Flynn spoke that based upon concerns and public comments and that these are likely not the final recommendations that it may not be possible for the Council to make a recommendation to the Board of Public Education at this time. Chapter 58 is on a separate timeline and

those revisions will be reviewed later. Ms. Allen noted that Chapter 58 adjourned last week and those revisions are being worked on right now. Ms. Allen noted that the final product of the Chapter 57 revisions will be brought back to CSPAC later. OPI has taken note of the comments and concerns from CSPAC and from the public comments and those will be incorporated into the final document of proposed revisions.

Chair Elder noted his appreciation for the opportunity to review the document, and thanked everyone for taking the time to review the document

***Dr. Kate Eisele moved to adjourn. Ms. Teresa Marchant seconded.***

## **ADJOURN**

Meeting adjourned at 7:16 PM.

*Agenda items are handled in the order listed on the approved agenda. Items may be rearranged unless listed "time certain". Action may be taken by the Council on any item listed on the agenda. Public comment is welcome on all items but time limits on public comment may be set at the Chair's discretion.*

*The Certification Standards and Practices Advisory Council will make reasonable accommodations for known disabilities that may interfere with an individual's ability to participate in the meeting. Individuals who require such accommodations should make requests to the Board of Public Education as soon as possible prior to the meeting start date. You may write to: Kris Stockton, PO Box 200601, Helena MT, 59620, email at: [kmstockton@mt.gov](mailto:kmstockton@mt.gov) or phone at 444-0302.*

**Certification Standards and Practices Advisory Council**  
**Written Public Comment**  
**November 3, 2021**

**1. Sharon Carroll**  
**Retired educator**  
**Ekalaka**

Thank you for reading this public comment regarding potential revisions to Chapter 57 of the Administrative Rules of Montana. As a Chapter 57 review task force member, recently retired mathematics teacher, and former chair and member of the Montana Board of Public Education, I deeply appreciate the role this advisory council plays in its review of this licensure chapter.

Though the task force came to consensus on items for change, I see that a few of those items did not reach your council. I will outline my concerns.

10.57.102 2b: I believe that the asterisked “and” needs to remain. Replacing the “and” with “or” without leaving the original language significantly changes the quality assurances for educator preparation programs.

10.57.301 3a: The task force did not reach consensus on choosing between “and” or “or”. A motion to move forward with the “or” language failed on a 6-6 vote. I did not support this motion because I believe that adoption of this language will have a significant negative impact on teacher quality and student content knowledge. Replacing the word “and” with “and/or” means that a candidate may receive an endorsement merely by obtaining a passing score on the Praxis. Montana students deserve high quality educators. The current rules sought that standard. This change promotes endorsement by Praxis. Our students deserve the high-quality educators that an endorsement from an accredited professional program delivers. Content knowledge and pedagogy are important. I began my college program as an engineering major, after two years changed my major to English, and then worked through MSU Bozeman’s educator preparation program to attain an endorsement in 5-12 English Education. Further work in a Mathematics educator preparation program culminated in a mathematics minor and an endorsement in 5-12 Mathematics. Under this new rule proposal, I would have quite likely attained passing scores on a few subject areas on the Praxis. Perhaps an administrator would have pressed me to take those tests to fill vacancies in the district. However, students in Montana would not have been well-served by my ability to take tests. Rather, they were well-served by an educator who demonstrated proficiency in both content knowledge and pedagogy delivered by an accredited educator preparation program. I urge the Council to respond to teacher shortage areas in ways which do not promote a process which will have such a broad negative impact on Montana students’ abilities to achieve proficiency on content standards.

10.57.601: The task force agreed unanimously to remove the words “or from any other credible source”. I note that the OPI states “OPI legal counsel advised to keep language as is and not to remove” this language, though no reason is given. It is currently problematic that a request for discipline can advance upon request of a “concerned citizen”. I urge CSPAC to seek its own legal counsel for this item. If the words “other credible source” are not removed, then please consider adding the definition of “credible source” to this rule, just as there are definitions of “immoral conduct” in 10.58.601A.

Thank you for your consideration of these items. I appreciate your service and the knowledge each of you bring to CSPAC. Thank you for volunteering your time.

**2. Diane Fladmo**  
**Director of Public Policy, MFPE**  
**Helena**

I appreciate the vital role of CSPAC in the review of Chapter 57 recommendations. Thank you for accepting and reviewing public comments regarding potential revisions to Chapter 57 of the ARM. I served as a member of the Chapter 57 task force as the Director of Public Policy for MFPE. MFPE represents over 12,000 professional educators and other school staff working in public schools throughout the state of Montana. Additionally, I've also experienced this work as a former chair and member of the Montana Board of Public Education.

The Chapter 57 task force came to a consensus on items for change, but a review of some of the changes did not appear as expected in the document provided to you for review. Therefore, I would appreciate your consideration of the following comments.

1. **10.57.102 2b:** MFPE believes that the asterisked “and” needs to remain. Replacing the “and” with “or” without leaving the original language, significantly changes the basic assurance that Montana educators complete a quality educator preparation program.
2. **10.57.301 3a:** The task force did not reach a consensus on choosing between “and” “or.” A motion to move forward with the “or” language failed on a 6-6 vote. MFPE did not support this motion because adopting this language will significantly negatively impact teacher quality and student content knowledge. Replacing the word “and” with “and/or” means that a candidate may receive an endorsement merely by obtaining a passing score on the Praxis. Montana students deserve high-quality educators, and the current rules sought that standard. This change promotes endorsement by Praxis. Our students deserve the high-quality educators that an endorsement from an accredited professional program delivers. Montana students will be better served by demonstrating proficiency in both content knowledge and pedagogy provided through an accredited educator preparation program, not merely by the ability to take a test successfully. This proposed change could have a broad negative impact on Montana students’ abilities to achieve proficiency on content standards.
3. **10.57.601:** The task force agreed unanimously to remove the words “or from any other credible source.” I note that the OPI states, “OPI legal counsel advised to keep the language as is and not to remove” this language, though no reason is given. It is currently problematic that a request for discipline can advance upon a “concerned citizen” request. CSPAC should seek legal counsel for this item. If the words “other credible source” are not removed, then please consider adding the definition of “credible source” to this rule, just as there are definitions of “immoral conduct” in 10.58.601A.

4. There have been written discussions among Chapter 57 Task Force members that the “successful experience” requirement should be changed to one year, a reduction from the three years that the Chapter 57 Task Force voted to approve. MFPE strongly believes that the three-year successful teaching experience requirement approved by the Chapter 57 Task Force should remain as adopted initially and proposed.

Thank you for your consideration.

**3. Virginia Mohr, Ed.D**  
**Assistant Director of Field Placement and Licensure, MSU**  
**Bozeman**

In my quarter century spent working with pre-service teachers at MSU Bozeman, I have observed that the overwhelming majority of students who fail EDU 495, student teaching, do not break down due to lack of content knowledge. The deficits are universally in the areas of professional dispositions and pedagogy. A state-approved licensure conduit that relies exclusively on a standardized content test (Praxis, in this case) threatens to put teaching privileges in the hands of ineffective educators who will harm children. A brief study of Montana’s EPAS teacher assessment system will quickly reveal that facility with content is only one piece of a necessary educator whole. Not only would I recommend that Montana educator licensure rely on more data than one standardized test score, but I would advocate for a holistic measurement that considers pedagogy and professionalism alongside of content acumen rather than the current “three-legged stool,” with each leg measuring content knowledge only. Montana’s children deserve better than discipline-facile robots. Certainly, our recent experience with Covid-forced, online instruction and the resulting loss of student achievement would remind us that, as the research has shown time and again, the most important factor in a student’s progress is his or her teacher. I would call on Montana to move forward, rather than take a step backward toward the one-sided “No Child Left Behind” era, which viewed student achievement through a too-narrow lens. Finally, I realize that rural Montana districts are growing increasingly desperate for teachers and that a condensed path to licensure may appear to be a quick fix. My study of the matter indicates that these communities have difficulty drawing competent community servants in all major professions. The problem is deeper than education, and all of us must continue to support every Montana child by providing compensation and other benefits to help encourage professionals to engage with rural communities.

**4. Jamie O’Callaghan, M. ED.**  
**Post Baccalaureate Specialist, MSU**  
**Bozeman**

Thank you for taking the time to accept comments on the proposed changes to ARM Chapter 57. I am limiting my comments to the following three areas:

I stand firmly against the following proposed changes:

- A tiered Class 2 license system, of which the first tier requires A language change to allow acceptance of state approved alternative educator preparation programs for licensure eligibility

- Regarding the change to allow acceptance of other states approval of alternative educator preparation program for licensure eligibility: this will allow teachers prepared in vastly sub-par programs to teacher in our Montana classrooms.
- A language change to add a teaching endorsement with a passing score on the content area Praxis test to a Class 1 or 2 license, bypassing added endorsement preparation programs.
  - This will lead to grossly underprepared teachers, who have not preparation in the content area, nor any pedagogical knowledge in the new area. This change WILL HARM children.
- Out of state EPP prepared educators are held to less rigorous standards than Montana EPP-prepared educators.
  - If our goal is to educate our children, then each and every child in this state needs access to a well-prepared teacher.

The proposed changes all have one thing in common: they will put vastly underprepared teachers in our Montana classroom in front of children. Our Montana children deserve much better than this. They deserve teachers who are well prepared in their content areas, and who have taken the requisite pedagogical methods courses and gained experience practicing in each area that they teach under the guidance and supervision of appropriate supervision and mentorship. As the post-baccalaureate specialist in the area of educator licensure for Montana State University, and as a member of this department that has worked in rural teacher preparation in this state for over 16 years, I am well aware of the difficulties faces by Montana schools in finding and hiring well prepared teachers. I have literally dedicated my career to helping facilitate these issues. And, while I agree that there is still much creative work to be done to solve teacher shortage issues state-wide, opening the floodgate to put underprepared teachers into our classrooms does nothing to improve the experience and quality of the full educational experience of our most vulnerable population – our children.

Solving the states’ teacher recruitment woes cannot happen by slashing teacher quality. Directly addressing the fact that our teachers are amongst the lowest paid in the NATION and in many cases live below the poverty level is the place where we need to begin to solve this crisis.

**5. Jule Walker**  
**Field Service Specialist, MTSBA**  
**Helena**

The dates stated by the OPI as being given for the Chapter 57 review are: November 2020 to November 2021.

The Task Force met for the first time: June 10, 2021, and the last meeting was October 21, 2021. A 4.5-month review is the sum of the Task Force work within the documented 12-month process that they have indicated. On the website the OPI has the following statement for the Chapter 57 TF members: *Thank you!!! We cannot thank you enough for the work you have done and accomplished in this Task Force. We will keep you updated on the progression of the recommendations in the coming days/week. Until we meet again! After our last meeting*



*there has not been any communication to the Task Force.* Based on transparency and information transfer I would have expected the OPI staff to communicate with the Task Force and share the document submitted to CSPAC and make them aware of the meeting. I only learned about the CSPAC meeting because of my connections to other educational organizations.

I do appreciate the work that Dr. Murgel and the OPI staff have put into creating the document she shared. I believe it would have been beneficial to review this with the TF as a review and approval of the language before being moved forward to confirm alignment and language. I would again like clarification of the process stated by Deputy Superintendent Allen at the beginning of the meeting.

As I understand it--First and foremost, this process is NOW in your hands. We thank you for your commitment and dedication to serving on this committee.

We strongly urge you to NOT impose new requirements such as mentorship programs into Chapter 57. A teacher should not have their license attached to something that is out of their control. By imposing a barrier such as mentorship into the licensing process this will create more recruitment and retention issues for placing qualified educators in front of our students. We implore you to see and understand the consequences this could create. Chapter 55 is opening soon, and mentoring is a part of the accreditation process. I am sure we can agree that mentoring is an extremely important component of the education profession. The TF does place a high level of importance on this topic—with a 8-5 vote. Since it has risen to this level of importance and based on the Chapter 55 review a comprehensive plan to address statewide mentoring opportunities which can be tailored to individual districts, can be developed and ultimately impact teaching and learning throughout the state. The Learning Hub, RESA's and comprehensive Professional Development at all levels can provide an avenue to better mentorship and induction for all educators.

The next point for consideration.

We are in strong support of a pathway that reduces the years of successful teaching experience to one year. I reached out to the TF and then with a follow up email to the OPI for reconsideration of this language. Twelve of the TF members, with support from MREA and SAM, are willing to consider this language.

1. One year of successful experience working for an accredited K-12 school in another state should be an adequate assurance of initial quality to justify licensure.
2. Let school districts determine who among the pool of applicants should be hired based on local control.
3. Three years is too high and almost guarantees that those we would be seeking to recruit would be tenured in another state and thereby much less likely to come to Montana.

As the Committee that will address this language and process moving forward, I respectfully request your due and thoughtful consideration.

**6. Ann Ewbank, PhD**  
**Professor and Dept. of Education Head, MSU**  
**Bozeman**

I provided the below public comment last night at the meeting, and I wanted to provide some additional information. In full disclosure, I was a member of the Chapter 58 feedback group.

- Both the Chapter 57 and 58 Task Forces requested the results of the OPI “research and review” period from November 2020-June 2020. On Friday, April 23, EPP faculty and administrators received an invitation to participate in a focus group to take place on Monday, April 26. Many people could not make this work on short notice. I rearranged my schedule to attend. We never saw the results, nor any other results from the research and review period.
- Both the Chapter 57 and 58 Task Forces requested data multiple times to better inform their recommendations. This included:
  - Substantiation of Superintendent Arntzen’s and Deputy Superintendent Allen’s claim of “[600 unfinished applications](http://reg17cc.educationnorthwest.org)” [reg17cc.educationnorthwest.org]. The OPI licensure staff stopped answering the phone months ago due to an 8 week backlog of applications to process. Emails go unanswered as well. Some of our students who graduated and were recommended in May 2021 are *still waiting* for their license. Could this be one of the reasons why?
  - Substantiation of the claim that Western Governors University enrolls 500 Montana students in their online EPP
  - Data indicating where out of state license applicants are teaching (Class AA, A, B, or C schools)
- REL Northwest was contracted to facilitate, but when it was clear that the facilitators did not have background knowledge or understanding of Montana administrative rule this is when Crystal Andrews and Zach Hawkins stepped in. The Task Forces wasted about one month because of this. In fact, as a member of the Chapter 58 feedback group, I was asked to present information halfway through the process to the Task Force. This presentation is attached. All of this should have been presented at the very beginning.
- According to Deputy Superintendent Allen last night, the timeline is being driven by the implementation of a new licensure system. This is not a good way to make administrative rule. It is also not a good idea to make rule based on anecdote. There were several times in the Task Force where rule change was proposed because of one district’s issue.
- The Chapter 57 Task Force membership was not representative of all stakeholders.
- Many of the teachers on both task forces and feedback groups resigned prior to the beginning of the school year due to the fixed meeting schedule (Thursdays 8-9:30). Resignations were not reported to the groups. An authentic process would have included these stakeholders.
- The feedback groups did not have the opportunity to provide feedback. The meetings were very high level overviews without examination of essential documents.
- Due to what I suspect was a surface research and review period, EPPs were not consulted about what they are doing. I can’t count the number of times I said “we already do that” in meetings. Many false assumptions about EPPs were perpetuated in this process.
- Although there were claims made that the process would be “transparent”, links to online meetings were not posted on the OPI website for specific meetings, or the

incorrect link was posted. I had to ask OPI staff for the link regularly on the day of the meeting. This dissuades the public from attending.

- This entire process has been flawed from the start and I believe that OPI leadership intentionally engineered the process in a manner that attempted to force task force members to support a predetermined outcome. [Please see this blog post \[reg17cc.educationnorthwest.org\]](#). I am very grateful for the civil servants in the agency who did the best they could, given the politically driven process.