

OFFICE OF THE GOVERNOR
STATE OF MONTANA

Greg Gianforte
GOVERNOR



Kristen Juras
LT. GOVERNOR

April 5, 2022

Board of Public Education
P.O. Box 200601
Helena, MT 59620

Dear Members of the Board of Public Education:

I am writing to offer comments on the proposed revisions to ARM 10.57 "Educator Licensure." On my second day in office, we initiated a comprehensive, top-to-bottom review of regulations in every state agency to cut back the thicket of red tape tying up Montanans and limiting their opportunities. Lt. Governor Kristen Juras is leading the effort, working with state agencies to identify rules and regulations that are excessive, outdated, and unnecessary. I appreciate the Board of Public Education (Board) and Superintendent of Public Instruction (Superintendent) undertaking a similar review of the administrative rules within your jurisdiction.

Montana is facing a critical shortage of K-12 educators. While we take a comprehensive approach to recruiting and retaining high-quality individuals into the teaching profession, we must eliminate barriers to licensure for those who are interested in teaching. I've charged agencies with two essential elements of red tape relief as it relates to licensing: reciprocity for out-of-state licenses and adopting prudent national licensure standards where they exist. I believe that these two elements should be applied to educator licensure as well.

I support the Superintendent's proposed revisions. I believe they will attract more Montanans to the teaching profession while making us competitive to high-quality, out-of-state educators who want to make Montana their home. I want to draw special attention to the below revisions:

- **Reciprocity.** Automatic reciprocity for military spouses and dependents licensed in other states creates an immediate pool of experienced educators while encouraging military families to make Montana their home. Additionally, I encourage the Board and OPI to enter into multi-state reciprocity agreements with states who have similar licensing standards to Montana.

- **Approved Educator Preparation Program.** Adding the proposed definition for approved educator preparation programs and accredited programs recognizes the diverse ways in which educators gain experience and can become licensed.
- **Student-teaching portfolio.** Adding a definition for a performance assessment, like a student-teaching portfolio, recognizes the diverse ways educators can demonstrate their teaching knowledge and skills.
- **Grade-level references.** Licensure definitions commonly describe grade levels instead of student ages. I disagree with suggestions that have been made to move from grade-level references to student ages throughout ARM 10.57. Keeping with grade-level references better reflects student progress and proficiency.
- **Unusual cases.** Transferring the authority from the Board to the Superintendent to exercise judgment with unusual cases will allow for cases to be more quickly acted upon and will free up Board meeting agendas.
- **Endorsements.** Expanding the ways educators can gain additional endorsements will make it easier for educators to teach a variety of subjects in which they are experienced. This will help address teacher shortages in specific content areas.
- **Class 1, 2, and 3 licenses.**
 - Removing years of teaching and administrative experience for out-of-state educators treats otherwise qualified applicants the same as in-state applicants, making Montana more competitive in attracting educators by removing arbitrary hurdles to licensure.
 - By adding professional development opportunities to university coursework for recency requirements, educators will be able to become more easily licensed without the time, money, and duplication associated with additional university coursework.
 - Providing additional pathways to prove subject matter expertise and treating traditional and alternative pathways equally remove unnecessary barriers to licensure that currently exist.
 - Adding the option for professional development in addition to traditional university coursework in Montana school law, finance, and collective bargaining will reduce the cost, time, and duplication associated with acquiring an administrator license.



- **Class 4 licenses.**
 - Expanding the bachelor's degree requirement and allowing an associates degree or apprenticeship program better reflect the industries from which CTE teachers might come.
 - Reducing the required work experience from 10,000 hours to 5,000 hours will open Class 4 licenses to more industry professionals.
- **Class 5 licenses.**
 - Expanding Class 5 provisional licenses will allow those, who want to teach but don't meet licensure requirements, to teach while they obtain the licensure requirements. This will address teacher shortages and help people such as paras, aides, counselors, and others become licensed.
 - Expanding flexibilities in Class 5 endorsement areas reduces unnecessary barriers for educators seeking licensure.
- **Class 6 licenses.** Allowing Class 6 counselor licensees to apply for a Class 3 administrator license treats school counselors' experience in working with students the same as traditional Class 1 and 2 teachers. This removes unnecessary barriers to licensure for counselors who want to become administrators.
- **Class 8 licenses.**
 - Removing barriers for college educators who want to teach dual credit is not only common sense but also will expand dual credit opportunities for Montana students.
 - Additionally, I encourage the Board to consider striking 10.57.437(4). The Certification Standards and Practices Advisory Council does not have the authority to administer a program or function or to set policy. Therefore it should not be reviewing Class 8 license applications. This additional, unnecessary step could cause delays in licensure.
- **Indian Education for All.** Montana's laws are unique with respect to the role that our schools play in educating youth about our state's American Indian heritage. I agree the IEFA professional development requirement should be incorporated throughout all license types.
- **Disciplinary Action.** I agree with the Superintendent to leave the language in 10.57.601(2) as it is currently written: "The Superintendent of Public Instruction

may initiate a request to the Board of Public Education for discipline against an educator/specialist's license within 12 months from the date of receiving direct notification of alleged misconduct from a local school district board of trustees **or from any other credible source.**" (emphasis added) Members of the public, including parents, should be able to file a complaint about official misconduct by a licensee.

Taken together, these efforts will help develop a stronger, more robust educator workforce, create greater opportunity for more Montanans, and help our students reach their full, outstanding potential.

Thank you for your consideration, and I urge you to adopt Superintendent Arntzen's proposed revisions to ARM 10.57.

Sincerely,



Greg Gianforte
Governor