

IEEWG Recommendations Draft Review

Thought Exchange Summary Report

Report design

This report provides both a summary of the feedback (supported by Thought Exchange's AI analysis) and a catalog of the feedback provided and NCEE's response. We advise the following process for reading and using the report.

1. **Read** the "Summary of the Feedback," "Areas to Investigate," and "Feedback in need of discussion" carefully and thoroughly.
2. **Read** the "Accepted and Noted Feedback" and identify any accepted or noted feedback from those sections that you believe require discussion during the facilitated discussion.

Summary of the feedback

The survey reveals a strong consensus among participants that the proposed recommendations, if implemented, would significantly improve the education system, with 65% of respondents either strongly agreeing or agreeing with this sentiment. Participants expressed a mix of support and concern across the four areas, highlighting the need for comprehensive funding reforms, enhanced teacher compensation, and a shift towards learner-centered education. Likewise, there are underlying issues such as the adequacy of funding formulas, the practicality of certain recommendations, and the need for more detailed analysis and stakeholder engagement.

Categories of feedback

Transforming Teaching: Participants generally support the idea of transforming teaching, particularly through competitive compensation and professional development. However, there is skepticism about the current analysis of teacher-related issues, with some viewing it as naive and incomplete. Concerns were raised about the practicality of certain recommendations, such as the focus on National Board Certification and the need for a more comprehensive understanding of the costs involved in recruiting and retaining teachers.

Early Childhood Education/Early Learning: There is strong support for early childhood education, particularly in terms of funding and intervention programs. However, participants expressed concerns about the current funding formula and the need for a more thorough

analysis of existing resources. Some questioned the logic of funding high school students at a higher level than lower school students and highlighted the need for a reevaluation of funding priorities.

Pathways to Graduation: While there is support for pathways to graduation, particularly in terms of middle school funding and career exploration, there are concerns about the focus on Career and Technical Education (CTE) and the potential for stratification by income and educational background. Participants emphasized the importance of balancing practical education with academic rigor and ensuring that all students have access to a broad range of post-secondary pathways.

Learner-Centered Design: The concept of learner-centered design is viewed positively, but participants expressed uncertainty about its practical implementation. There is a need for clearer definitions and a roadmap for transitioning to this model. Concerns were raised about the scalability of certain models and the need for stakeholder buy-in, particularly from teachers, parents, and school boards.

Educational Governance and Implementation Systems: Participants support the idea of harmonizing policy language and governance models, but there are concerns about the complexity and feasibility of these efforts. The need for a coordinated approach among various stakeholders, including policymakers, educators, and the public, was emphasized. There is also a call for more transparency and public engagement in the decision-making process.

Favorability Overview

	Favorability score
Average Score	64%
How much do you agree with the following statement: These recommendations, if implemented, would improve the system of education and move us closer to fulfilling our constitutional obligations to develop the full educational potential of each person and provide equality of educational opportunity to each person of the state.	64%

Efficacy of the Recommendations

Q10: How much do you agree with the following statement: These recommendations, if implemented, would improve the system of education and move us closer to fulfilling our constitutional obligations to develop the full educational potential of each person and provide equality of educational opportunity to each person of the state.

Answered: 14 | Not answered: 2

Item	#	%
Strongly disagree	0	0%
Disagree	1	7%
Somewhat disagree	3	21%
Neither agree nor disagree	1	7%
Somewhat agree	0	0%
Agree	4	29%
Strongly agree	5	36%

Which recommendations need the most time allocated for discussion?

Ranking	Average ranking	Top choice count	If needed, Facilitators will lengthen discussion periods on the top 3 ranked topics by 'borrowing' time from the lower-ranked topics
#1 Transforming Teaching	2.36	4	
#2 Early Childhood Education / Early Learning	2.71	3	
#3 Recommended design features of educational governance and implementation systems	2.71	5	
#4 Learner Centered Design	3.21	2	
#5 Pathways to Graduation	4.0	0	

Areas to Investigate

- **Funding Formula:** Concerns about the adequacy and logic of the current funding formula were raised, with 100% of participants identifying it as a critical area for discussion. Further investigation is needed to ensure that funding is equitable and aligned with educational priorities.
- **Teacher Recruitment and Retention:** The analysis of teacher-related issues was viewed as incomplete by some participants, highlighting the need for a deeper understanding of the costs and challenges involved in recruiting and retaining teachers.
- **Implementation of Learner-Centered Design:** While there is support for learner-centered education, there is uncertainty about its practical implementation and the need for a clear roadmap and stakeholder engagement.
- **Governance and Policy Harmonization:** The complexity and feasibility of harmonizing policy language and governance models require further exploration to ensure effective implementation and stakeholder coordination.

Feedback in need of Discussion

The following feedback requires some discussion during the December session.

Transforming Teaching

None

Early Childhood Education

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none">• I'm passe about this. Data in past decades has been underwhelming. Current data is too fresh, longitudinal studies are needed before launching	Noted. NCEE will raise as a topic of discussion.	

into this area with more taxpayer dollars.		
<ul style="list-style-type: none"> Providing upfront funding for districts in their first year of administering early targeted intervention programs is putting a band aid on a fundamental problem with the funding formula. Why is this program being singled out for this type of treatment? 	The small group recommendation to provide upfront funding was accepted in the November session. NCEE will highlight this as a discussion topic.	

Pathways Design

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none"> Is the sponsor of STARS amendable to this policy change? (changes to future ready payment 	NCEE will add to discussion questions	
<ul style="list-style-type: none"> By heavily focusing on CTE, are we forgetting other post-secondary pathways? 	NCEE will add to discussion questions	

Learner Centered Design

None

Accepted and Noted Feedback

Accepted feedback is feedback that NCEE will include in its revisions.

Noted feedback is generally feedback that did not seem actionable, but that we have received and will consider.

TRANSFORMING TEACHING

Answered: 14 | Not answered: 2

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none">I feel the Transforming Teachings section is a weak area in the report, but in large measure I do not see this as NCEE's fault. On a large scale, too much of this report seems to look to please, or reify, the beliefs held by the "Constitutional Players" going into this interim. Frankly, I find the entire analysis of the teacher situation to be naive and incomplete. I include in that the Labor departments support paper for legislation from the past session which we were given last week. Until we start to understand what truly comprises a cost, we will be stuck in a cycle of making small, meaningless, adaptations that fail to alleviate any of the real issues, real costs, that are making it difficult to recruit and retain teachers. I am not hopeful that we are moving in that direction, but maybe I will be pleasantly surprised. **continued later if space allows**	Noted.	
<ul style="list-style-type: none">As part of getting to a livable wage and increasing the public's view of teaching as a profession, we must	Accepted. NCEE will incorporate into the	

consider moving to year-round school, which would not only reduce the need for gig jobs in the summer but also dramatically reduce lost learning and improve student performance.	"considerations for Phase 2" section of the report.	
<ul style="list-style-type: none"> Legislators have increased teacher pay over the past few legislative sessions, and that should be recognized. 	Will be included in the full report in the "Montana Context Section"	
<ul style="list-style-type: none"> Not a lot of focus on how to address funding formula considerations. Recommendation f seems shortsighted - taking the best teachers out of the classroom? Maybe a better way would be a focus on teachers who have a skill-set for admin being trained for admin instead of the "most capable teachers". For recommendation g, who determines "competitive"? The last sentence regarding inflation is very good though. 	<p>NCEE plans to include the funding formula issues raised here in the "considerations for phase 2" section of the final report.</p> <p>NCEE will clarify the intent of recommendation f in the report</p> <p>Accepted. NCEE will include a statement that a definition of competitive should be backed by economic research on the wages that would induce more teachers to choose Montana and to stay in Montana</p>	
<ul style="list-style-type: none"> Equitable funding for teachers regardless of the demographics and population they are serving. 	Accepted	
<ul style="list-style-type: none"> I think that taken together the recommendations call for a "cradle-to-grave" system for the education and professional development of teachers (and administrator/leaders). 	<p>Accepted</p> <p>Accepted and certainly suggested in the systems section. NCEE will check for</p>	

<ul style="list-style-type: none"> Developing such a system will require synchronizing the efforts of the BPE, OPI, and the MUS's colleges of education, i.e., "coherent governance." 	<p>clarity.</p>	
<ul style="list-style-type: none"> Apprenticeship. (Citing 1/25 ratio is misleading; in MT the ratio is closer to 1/15) NBC is great but not scalable. An internet search showed around 175 NBC teachers in the state, out of about 10,000. Administrators need to sit knee-to-knee with their teachers and hold them to account for their goals on student outcomes. Regularly. 	<p>Montana currently ranks 20th in terms of percentage of NBCT teachers.</p> <p>NCEE will revisit cited ratios.</p> <p>Roles of administrators in accountability can be mentioned.</p>	
<ul style="list-style-type: none"> More & better PD is great and necessary. But I honestly don't know that more money is the solution to the explosion in EA teachers. There is more than just money and I talked to a teacher just today who is stepping away from the profession and is blaming parents and student attitudes----not the salary. 	<p>Accepted. The EA teachers point is meant to be illustrative of how vacancies are filled - a 'miners canary.'</p> <p>Accepted</p>	
<ul style="list-style-type: none"> I don't think I heard any objections from BPE, OPI, and OCHE, so I'm going to presume that the ideas and recommendations we've been discussing are actual possibilities that won't face pushback. Beyond a debt-free pathway, I support the stipend route to attain National Board Certification. Also, adding comprehensive considerations to the compensation package is essential, especially 	<p>NCEE believes that there will be normal tensions between different organizations about how to deliver recommendations, but that a thoughtful, co-designed implementation plan that builds off of the one we provide can smooth tensions. We have heard from BPI that OCHE has</p>	

<p>considering health insurance and retirement considerations.</p> <ul style="list-style-type: none"> • I'm wondering about the phrase "enhanced by technology" in section C and would like to understand it before moving forward. I would be especially leery if this means using AI. 	<p>partnered well on areas of need and we found that encouraging.</p> <p>Noted</p> <p>NCEE believes any approach that doesn't leverage technologies such as scheduling tools, parent communication, teacher learning platforms, remote conferencing and even recorded teaching support is not going to yield the desired results. However, Montana policymakers are better positioned than NCEE to address if, when, and how AI is used in the suite of technology tools.</p>	
<ul style="list-style-type: none"> • I strongly support the overall direction and appreciate the clear recognition that Montana needs a coherent, career-long system of support for educators rather than isolated fixes. I believe the continuum for teacher and leader development should be tightly aligned, with clear expectations, mentorship supports, and accountability for quality at every stage. I like the focus on redesigning staffing models and creating pathways that allow excellent educators to grow professionally without leaving the classroom which is critical for retention and instructional quality. 	<p>Accepted</p>	
<ul style="list-style-type: none"> • No specific feedback. Good list! 	<p>Accepted</p>	

<ul style="list-style-type: none"> I like it. We need to incentivize people to go into & remain in the field. I would add we need to work collaboratively with MUS as well as OPI and the Board of Public Ed to design alternative paths. 	Accepted. NCEE will add this to the recommendation	
<ul style="list-style-type: none"> Appreciate recommendation to provide teachers a livable wage, and the earlier recommendation to provide a pathway to the classroom without the burden of debt. 	Accepted	
<ul style="list-style-type: none"> Appreciate recommendation to provide dynamic professional development—best practices will change over the course of a career, and teachers need to evolve their practice. 	Accepted	
<ul style="list-style-type: none"> Appreciate recommendation to explore team-based teaching models that may involve a higher student-teacher ratio but provide appropriate supports. It's controversial, and it's risky, but ultimately we need increased efficiency to provide compensation increases that exceed inflationary increases. 	Accepted. Will note in the recommendations or in the implementation plan	
<ul style="list-style-type: none"> As someone who passed a bill to increase the state's current NBCT stipend, I appreciate the recommendation to provide assistance on the front-end for teachers who aspire to certification, but I also think you should recognize the existence and importance of the current stipend for those who maintain certification. 	Accepted. Will add in the Montana context section	

<ul style="list-style-type: none"> I want to add that on page 4 letter C that it mentions classes of 25 to 1. In larger schools at the middle and high school levels the numbers are up to 33 in rare cases, but 30 is a norm. The difference in a class from 25 to 30 is profound. I do think these are great recommendations and would go a long way to improving our student outcomes. 	Accepted. We will consider how to mention ratios in a way that is authentic to the research and accurate for the state	
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EARLY CHILDHOOD EDUCATION/EARLY LEARNING

Answered: 14 | Not answered: 2

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none"> Having participated in this section, I thought the writeup missed the central area of reform which was needed. To wit, that per student funding needs to be rethought on the basis of whether there is any compelling logic in funding high school students at a level higher than lower school. Also, while I do not have studies in front of me, my understanding is that the decay/retention issues around early ed were reversed from what was stated. 	<p>Accepted. The rethinking of the funding formula will be included in the "considerations for phase 2" section and also made more clear in the early childhood recommendations</p> <p>We will revisit the research and ensure accuracy of content.</p>	
<ul style="list-style-type: none"> We need to expand screening and have OPI adopt a single universal screener instead of providing options in order to get more usable metrics. 	Accepted	

<ul style="list-style-type: none"> • Granted, I have not reviewed all of the literature, but is there really any question that high quality ECE is beneficial and worthwhile? I hope the following statement isn't an unnecessary hedge against criticism from the one commissioner who has questioned ECE efficacy: "While studies focused on test scores suggest that even high-quality ECE can have fade-out effects, positive impacts on students' interpersonal and social skills appear to remain." • Appreciate the recommendation to provide upfront funding necessary to implement targeted intervention programs—should we in fact provide "bonus" funding to further incentivize? 	<p>We believe that the research supports the benefits to students and families. We will reconsider what research we cite in this section to support the recommendation.</p> <p>NCEE can revise the recommendation to read “at minimum support adoption.” If the Commission wants to further promote ECE programs, we can note it in the implementation plan.</p>	
<ul style="list-style-type: none"> • Appreciate recommendation to "create a voluntary, opt-in early learning program." We are behind most other states in our own nation, not to mention so many other countries. It's time, and with the exception of the aforementioned comment, I appreciate the clear statement of value that expended ECE would provide Montana students. 	<p>NCEE can note Montana's relative ranking vs other states this in the state context section.</p>	
<ul style="list-style-type: none"> • Recommendations a and b are solid and are items we can address through the funding formula. Recommendation e seems like a stretch and may be expensive to fund. 	<p>Accepted</p>	

<ul style="list-style-type: none"> Investing in Early Childhood is high priority in my opinion. Early intervention is so effective & important. 	Accepted	
<ul style="list-style-type: none"> Can you provide examples of any additional resources or special policies that are employed by high-performing schools with a large number of ELL students and/or students living in poverty, as compared to other high performers? 	We are investigating this and will provide it if available.	
<ul style="list-style-type: none"> Upfront funding would seem to be obvious. Schools don't have the seed money to build out these programs ahead of the students and the funding. 	Accepted.	
<ul style="list-style-type: none"> If early learning programs are currently voluntary for school districts and families, why should we redesign the funding formula to incorporate them? 	Early learning is defined as PK-3. There is an open question amongst commissioners as to whether current formulas account for the difference between costs for providing equality of opportunity for education in elementary, middle, and high school students. NCEE will raise the policy design question of "how do we design a funding formula that neither underfunds nor overfunds students based on age/grade, disability status, SES, or language?"	
<ul style="list-style-type: none"> HB 462 was failed legislation that was vetoed by the Governor in 2025. There are existing resources to 	Accepted. NCEE will include in the implementation plan (at a minimum) that an accurate accounting of currently	

provide high-quality materials that should be examined.	available resources is necessary for a final determination of new need. NCEE will also stipulate any discussion of costs provided for the implementation plan are not to be considered “new costs” and may already have appropriate funding available.	
<ul style="list-style-type: none"> Concerns with providing transportation reimbursement for 4-year olds. Transportation costs are outside of ANB, so why should we include this? 	NCEE will raise as a discussion topic.	
<ul style="list-style-type: none"> ANB funding is a consistent theme—it needs to be right-sized for what it is intended to fund at all levels in order to meet school needs and court-directives. A thorough review is needed; the IEEWG seemed to focus on consistent curriculum across schools. Standardization is fine and useful, but it further calls into question the need for 400 school districts that look exactly the same. A review of school structure is desperately needed. 	<p>Accepted. NCEE will include in the ‘considerations for phase 2’ section</p> <p>Accepted. NCEE will include in the ‘system design’ section.</p>	
<ul style="list-style-type: none"> In reviewing the Early Childhood Education / Early Learning recommendations, I strongly support the direction outlined and would encourage the state to view these steps as a pathway toward universal access to high-quality pre-K. The evidence cited in the report makes clear that early learning investments yield strong returns, particularly when 	Noted	

<p>paired with quality instructional materials, professional learning, and alignment with K–3 systems. While targeted and opt-in models address immediate barriers and administrative constraints, universal pre-K offers a long-term opportunity to normalize early learning as a core part of Montana’s public education system, reduce stigma associated with eligibility-based programs, and ensure that all children—regardless of geography, income, or family circumstance—enter kindergarten ready to learn. Moving incrementally toward universal pre-K, beginning with sustainable funding, would strengthen equity and support families and communities statewide.</p>		
<ul style="list-style-type: none"> I support amending the funding formula to include the recommendations from sections B & E; I think this would be especially beneficial for rural communities. Overall, I believe everything in this area should be implemented, and it should be a big part of a "roadmap" between now and the next decennial study. 	<p>Noted</p> <p>NCEE considers the Implementation plan to be a key step towards a roadmap</p>	
<ul style="list-style-type: none"> Professional Development is critical and so is teacher preparation. 	<p>Noted</p>	
<ul style="list-style-type: none"> Focusing on only 1 or 2 of these recommendations leaves room for lower outcomes and restricted access for students. I like how comprehensive the recommendations are! 	<p>Noted</p>	

PATHWAYS DESIGN

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none"> It will come as no surprise that I find the concentration on CTE as a major part of education in Montana to be wrong headed. I have stated, many times, that I feel the dual risks of stratification by parent income/educational background, and rent seeking to be significant. I firmly support practical education in our schools, and the trades are valuable and honorable areas in which to work. I simply feel that the risks of students not knowing algebra in high school are significantly higher than the risks of somebody learning a trade a year later than he might otherwise. And that risk is likely more significant for those who go into trades than those who choose the college path, which is the bitter irony of much of this push. 	<p>Noted. NCEE included in the report that data analysis and reporting should be able to check to ensure that CTE / pathways students are not being tracked and that pathways are not stratifying students</p>	
<ul style="list-style-type: none"> Pathways to graduation are greatly improved with learner-centered design. Involving local business communities to collaborate with student pathways also creates synergy and support for our public schools, which is desperately needed in our current political environment of distrust. 	<p>Noted.</p>	

<ul style="list-style-type: none"> I agree with these recommendations. This is the best section in my opinion and are things we can address through the funding formula. 	Noted	
<ul style="list-style-type: none"> I think we are off to a great start with Profiles of Graduates. We need to continue to expand & ensure schools have the resources to meet the diverse needs of each school & community in order to support the students. 	Noted	
<ul style="list-style-type: none"> I feel ambivalent about this. Expecting a kid to know what they want to be may be asking too much. On the other hand, working as part of school holds great promise for some. 	Noted	
<ul style="list-style-type: none"> If we are going to continue to push things younger and younger, then we need to fund those middle school programs as well. Need to promote career exploration in younger grades. 	Noted. NCEE will add “funding for middle school pathway programs” to the list of considerations for phase II – funding formula	
<ul style="list-style-type: none"> Again, ANB funding is a consistent theme—it needs to be right-sized for what it is intended to fund at all levels in order to meet school needs and court-directives. A thorough review is needed. 	NCEE will add “funding for middle school pathway programs” to the list of considerations for phase II – funding formula	
<ul style="list-style-type: none"> I believe this section also highlights a significant and persistent funding discrepancy between middle school and high school that must be addressed for these pathways to function equitably. Middle school is a critical developmental window for career 	NCEE will add “funding for middle school pathway programs” to the list of considerations for phase II – funding formula	

<p>exploration and skill building, yet current policy allows middle school pathway activities to count for credit without providing proportional ANB or programmatic funding. This misalignment places districts in the position of doing more with fewer resources and limits their ability to respond to student interest and demand. I strongly support increasing funding and allowable uses for middle school pathway programs. If Montana is serious about future-ready graduates, then investments must reflect the full continuum of preparation, not just the final years of high school.</p>		
<ul style="list-style-type: none"> I think section B, greater middle school funded opportunities, is an excellent way for districts to retain local control and flexibility. 	Noted	
<ul style="list-style-type: none"> Increase middle school funding for CTE pathways. 	NCEE will add “funding for middle school pathway programs” to the list of considerations for phase II – funding formula	
<ul style="list-style-type: none"> Nothing specific. I think we have done some good work on this and need to continue that good work. 	Noted	

LEARNER CENTERED DESIGN

Answered: 14 | Not answered: 2

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none"> This section seems largely aspirational to me. While learner centered education is good, I guess, nobody was able to explain to me, despite my many attempts to clarify, what the actual utility of a portrait of a graduate was. Again, I don't have a particular problem with it, I simply don't understand that centering it, as opposed to, say, English literature, makes any sense at all. 	Noted	
<ul style="list-style-type: none"> I do not see another way to address the challenges of preparing students for careers and life in a world of such rapid technological advancement. We have to make the pivot to learner-centered, self-directed education quickly for public schools to remain relevant. "If you don't like change, you are going to hate irrelevant." ~ General Shinseki, 34th Chief of Staff, United States Army 	Noted	
<ul style="list-style-type: none"> Once again, I agree with this prioritization, but these recommendations seem overly abstract and underdeveloped—you're telling us we need a roadmap, but I think we need you to provide us a roadmap, informed by other jurisdictions who are ahead of us in this pursuit. It seems to me that we 	Accepted. The implementation plan gets closer to a roadmap - please revisit this feedback after reviewing the implementation plan	

really need more specifics on how we incentivize proficiency based learning without putting district funding at risk through reduced ANB if a student graduates early, for example. And how do we provide students with more agency while also ensuring they achieve basic competencies?		
<ul style="list-style-type: none"> Recommendations a and c are best. Graduate profiles are a good tool. 	Noted	
<ul style="list-style-type: none"> I believe this is so important and really encompasses or supports all other areas & recommendations. However this is the hardest to shift & get buy in, from my perspective. Education should be learner centered. It's about the students & helping them to grow & become successful. 	Noted	
<ul style="list-style-type: none"> I think that the recommendations make the point that we must become more specific when discussing "proficiency-based learning." Otherwise, we won't be able to make funding decisions that support meeting this objective. 	Noted	
<ul style="list-style-type: none"> The Bishop school in Calgary model sounds excellent. It motivates the student; it shows tremendous results. If such a model is scalable, I think it would be great. 	Noted	

<ul style="list-style-type: none"> We are all in agreement that "learner centered design" sounds GREAT! But I would guess that 95+% of the current teachers have no idea how to design such a system.....and sell it to parents.....and their boards.....and their communities. 	Noted	
<ul style="list-style-type: none"> Adopting common definitions of key terms would be helpful to reduce confusion and conflict in statute - aligns with the Administration's goals of red tape relief 	Noted	
<ul style="list-style-type: none"> From a 30,000-foot view, what if the State/OPI/BPE offered a shared-services model to implement these ideas? I know this sounds like it could infringe on local control, but we need to find ways to streamline and remove barriers/reports/etc. if we want to add new requirements. I'd hope a significant first step would be to complete recommendation A. My favorite part of this model is the "roadmap" idea, or a menu, for achieving success. 	Accepted. NCEE will note in the systems governance section that shared services models for support/implementation should be explored	
<ul style="list-style-type: none"> I strongly support the Learner Centered Design recommendations, particularly the emphasis on clarity, alignment, and practical support for implementation. Many educators are eager to design learning experiences that are more responsive to students' needs, strengths, and interests, but inconsistent definitions in policy and outdated reporting requirements often create confusion and hesitation at the classroom level. I appreciate the call to align terminology around proficiency and to 	Accepted. NCEE will revisit to ensure that the "need for clear roadmaps..." is reflected in the report text	

remove barriers such as seat-time and rigid teacher-of-record requirements that no longer reflect how learning actually happens in modern classrooms. What resonates most for me is the need for clear roadmaps, examples, and technical assistance—teachers want to do this work well, not just differently. Learner-centered approaches are most effective when educators are supported with high-quality instructional materials, time for collaboration, and clear expectations.		
<ul style="list-style-type: none"> As previously mentioned, now regarding the roadmap: Standardization is fine and useful, but it further calls into question the need for 400 school districts that look exactly the same. A review of school structure is desperately needed. 	Accepted. NCEE will add “review of school structures” to the phase 2 considerations and to the systems policy recommendations	
<ul style="list-style-type: none"> First, we must address the problem with the new state assessment. I do not believe that it is learner centered. 	Accepted. NCEE will note in the report that reviews of current policies, assessment practices should be examined to determine if it is aligned with a learner centered vision	
<ul style="list-style-type: none"> I need to understand the impacts of the “teacher of record” portion here. I understand that that is an example of a policy that could change. I think I would comment that policy changes like these will require thought to not result in unintended consequences. 	Accepted. NCEE will note that governance bodies will need to be “future forward” and be able to examine proposed changes and anticipate unintended consequences.	

RECOMMENDED SYSTEM DESIGN FEATURES

Answered: 14 | Not answered: 2

Commissioners' feedback	NCEE response	Discussion
<ul style="list-style-type: none"> I agree that harmonizing the language in code is a worthy endeavor. I am not sure I mean the same thing others might here. Too much in Montana policy right now attempts to circumvent actual educational success through renaming and reorienting frequently enough to make reaching goals almost inevitable, except we only reach the reconfigured metrics, the proxies for proxies for quality. We aren't doing ourselves any favors by replacing the hard work of education with the easy work of question begging. Otherwise, I do agree with the general goals you put forth. I simply think they tend toward being too high level for where we are. But in general, I am able to support the idea that we should have a forward looking, aspirational educational system, we just need to lay the foundation for doing so. 	Accepted. NCEE will include language that supports the goal of unified and coherent definitions and easily understood logic models that can be used to track outcomes	
<ul style="list-style-type: none"> We have to be very intentional about fostering innovation rather than inadvertently stifling it with too many rigid mandates or square peg reporting requirements. Competitive laboratories. This should 	Noted.	

include very high standards without being overly directive on how to get there. A component includes testing, but it should also include things like graduation rate, employment rate, average wages after x years, college graduation rates, etc.		
<ul style="list-style-type: none"> You mention "necessary infrastructure," but I don't see a reference to the role of school facilities and educational technology. We are struggling with huge backlogs of deferred maintenance for our facilities and increasing reliance on technology, at a time when the cost of both is outpacing inflation. 	Accepted. NCEE will include this in the current context section so it is less abstract in the final report.	
<ul style="list-style-type: none"> This seemed very policy focused and I'm not sure there is always a good nexus with funding. I do agree there are different governance models that can provide for better outcomes, and public engagement is very important to keep in the forefront. 	Noted.	
<ul style="list-style-type: none"> It's important to continue to educate & share so all stakeholders know & understand the education system & the flexibility. We need to elevate our professional educators. We need to ensure we have the financial capacity to carry out high performing systems in the public schools across Montana. We need to consider the diverse needs of ALL learners & adequately fund our schools to have the ability to educate & support those diverse needs. 	Noted.	

<ul style="list-style-type: none"> The key here is ensuring that the various entities engaged in defining, implementing, and funding Montana's education system are coordinating their efforts. Also central to successfully moving forward is having a data system that supports decision making at all levels. 	Noted.	
<ul style="list-style-type: none"> We began with a "relentless focus on student outcomes." The word outcome did not make it into the report. Instead we got to design, system, innovation, etc., etc. Also many items required funding, taxes, at unspecified levels. I'm uncomfortable with "the Working Group agreed that..." No votes were taken showing variations of thought in our group. I also note the low priority of academics in the bullet points. Maybe the "clientele", taxpayers and parents, are getting what they want, that is "communication", and other non-measurables. 	<p>Accepted. We will revisit the discussion of outcomes in the recommendations and ensure it appears in the Montana Context section.</p> <p>Accepted - the word "agreed" will be removed.</p> <p>Accepted: Academic performance will be a primary section of the Montana context</p> <p>NCEE will include academics in the discussion</p>	
<ul style="list-style-type: none"> We need more working together between those who make the rules and those who carry them out. Perfect example is the unintended consequences of the revised fingerprint guidelines for schools. Made with the best of intentions, but not working..... 	Noted. This is an example of the need for coordinated governance both vertically and horizontally, a point made in the recommendations.	

<ul style="list-style-type: none"> While a laudable goal, harmonizing policy language and nomenclature will be a huge lift. 	Noted.	
<ul style="list-style-type: none"> Where can the collective governance stakeholders reduce the required/out-of-sync requirements? This idea came up during our November small-group breakout focused on Transforming Teaching. In 2025, the legislature passed a bill requiring that bill-sponsors be included in agency rule-making to ensure legislative intent is followed, I think that plays a part in the Governance design subsection. 	Accepted - this will be included in the implementation plan.	
<ul style="list-style-type: none"> I agree with all of the subsections and would like to see them implemented in the 2027 and 2029 sessions. Perhaps the roadmap could become the project of the Education interim committee after initial bills are passed in 2027. <p>One special note on the public engagement features: all legislators need to take an active role in understanding these changes so we can step into an information-sharing role.</p>	Accepted - we will consider this in the implementation plan	
<ul style="list-style-type: none"> My key feedback is that these system features must remain grounded in the day-to-day experiences of educators: data systems should inform instruction, not overwhelm it, and governance structures should elevate educator voice rather than add layers of bureaucracy. When designed and implemented thoughtfully, these recommendations can create the 	Noted.	

conditions teachers need to focus on what matters most—supporting student learning and ensuring equitable opportunities for all students across the state.		
<ul style="list-style-type: none"> Now regarding HQIM: Standardization is fine and useful, but it further calls into question the need for 400 school districts that look exactly the same. A review of school structure is desperately needed. 	Noted. Review of school structure will be added to the implementation plan.	
<ul style="list-style-type: none"> I need to hear more before I can give feedback of where the basic skills of education are embedded, before I can answer this. 	Noted. NCEE will add as a discussion question.	

Additional Comments:

Answered: 9 | Not answered: 7

Feedback Category: Funding	NCEE Response	Discussion
Funding	NCEE will incorporate this feedback in the “considerations for phase 2” section of the report	
Feedback in category		
<ul style="list-style-type: none"> Linking so much funding in title 20 to accounting fictionalists like ANB, QE etc is a real and significant pathology throughout the funding formula, and creating many bad outcomes. I know that this isn't NCEE's focus, but this fiction to funding pipeline is 		

forcing us into distributional assumptions in SPED funding, facilities and more that are simply untenable, and it will persist until this addiction is broken.

- Has there been an analysis of the changes in the funding formula from the 2025 legislative session? Those should be taken into account when looking at proposing any new changes to the funding formula, but they seem to largely have been missed from this conversation.
- Before proposing new funding for programs, there should be an evaluation of the current resources provided and what shortfalls in the current landscape warrant funding for a new program. There are many current resources for high quality instructional materials, and they should be examined prior to proposing new funding.
- I would like for us to put recommendations forward that are holistic and would actually lead to improved systems that lead to improved outcomes. I worry that there might be a desire to “water down” these recommendations using funding as an excuse. Our job here is to evaluate the system to create a system that develops the full educational potential of each person. The money conversation will come later.
- IF we can actually pull off and fund all of these items, we could really make a positive impact on education in MT.

Feedback Category: Undercovered topics	NCEE Response	Discussion
Mental Health Academics	Accepted. NCEE recognizes that these topics need to be included more explicitly in the final report. NCEE will add to our discussion questions.	
Feedback in category		
<ul style="list-style-type: none"> • The apparent increase of student mental health problems arguably due to the pervasiveness of cell phones and social media came up several times during our discussions. I believe this issue verges on being a public health emergency. Recommendations for mitigating the effects that cell phones and social media are having on children's cognitive and social development should be 		

included in the report--perhaps under Educational Governance and Implementation Systems because addressing this problem will require a coordinated, system-wide effort.

- Overall, I wish these recommendations included more actionable options based upon what our rural, neighboring states are doing better than us.
- I know that Montana is failing to meet several of our constitutional requirements, as evidenced by at least one current lawsuit. Did we miss an opportunity to grade ourselves on where we require improvement?
- Like I alluded to above, maybe several times, I feel the analytical work that has been done in looking at Montana's problems, both funding and human, to be decidedly thin. I would like to absolve NCEE of responsibility here, as I think you have certainly fulfilled what we asked of you, but I guess I would have preferred you to push us off of those easy common places upon which we have built the current structure. It isn't working, and doubling down on failure isn't a plan.
- What my experience in education has shown me is that students that are not taught and have learned the basic skills of reading, writing, and math have a difficult time being problem solvers and communicators. These skills are the foundation to all soft and hard skills needed to be a global citizen of life.
- I just want to plug special education considerations again.
- Many proposals in the early learning section need further discussion.
- Systems are a less helpful goal than individual student attainment/progress.

Feedback Category: Undercovered topics	NCEE Response	Discussion
Systems impacts	NCEE will incorporate this feedback into the report.	
Feedback in category		
<ul style="list-style-type: none"> • Ensuring that implementation prioritizes clarity, sustainability, and respect for educator expertise will be critical to the long-term success of these recommendations. • **also regarding #10** I think the work has been worthwhile and generally well done, but I don't think it is what moves us toward a more successful system. I will say that thinking about what a successful system looks like is worthwhile, so if the net result of the process is people starting to think, I would upgrade my answer significantly. 		

- Effective system-level governance allows for creating the conditions under which local school districts can best and efficiently improve the performance of their schools.
- I strongly agree because these recommendations take a coherent, system-level approach to improving public education while remaining grounded in the lived realities of students, educators, and communities across Montana. The focus on early learning, transforming teaching, learner-centered design, and meaningful pathways to graduation reflects a deep understanding that equity and opportunity are built over time—not addressed through isolated or short-term fixes. Importantly, the recommendations acknowledge that fulfilling our constitutional obligation requires both strong instructional practices and the systems that support them.
- Number 7 has lots of implications and potential change. I didn't dive into the nuance and generalized my views of these things. The conversations to make big system wide changes will take time and we will need to get these right.
- Because it represents what I see as a significant way to leverage one of the minor suggestions toward fixing something truly broken in Montana's system.
- Some of these recommendations appear to be language that maybe a cookie cutter model that may or may be probable in the next ten years without adequate funding to keep teachers in the state.

MOST SUPPORTED RECOMMENDATIONS (don't require re-visiting)

Answered: 14 | Not answered: 2

Feedback Category	NCEE Response	Discussion
Most supported recommendations	Accepted	
Feedback in category		
<ul style="list-style-type: none"> • Looking at the document there are a good number of issues upon which I believe there was significant consensus. In particular, the ideas of start up costs for early ed programs, and the universalizing of eligibility for these programs. I also agree with the recommendation of improving curriculum throughout the state. • Transforming Teaching: g. Ensuring Competitive Compensation: All of the above must be anchored in a commitment to Montana's teachers earning a livable wage. 		

Early Childhood Education / Early Learning b. Incorporate the current and future needs of early learning programs into the redesigned funding formula.

Pathways to Graduation a. Increase overall funding for middle school CTE pathways programs.

Learner Centered Design b. Develop a roadmap for progress in moving toward a learner-centered model that provides each district with milestones for each phase of implementation.

- Strengthening recruitment and preparation pathways, supporting national board certification (w/ claw back provision)
 - Page 5, a, page 6, b,
 - Transforming Teaching
- Pathways to Graduation
- Instructional materials design features
- 1. Creating a well-defined, roadmap for a district to transition to learner-centered, proficiency-based education.
 - 2. Developing a sophisticated, comprehensive data management system to drive local-level and state-level decision making.
 - 3. Providing HQIM.
 - Transforming teaching. Strong focus on student outcomes by teachers and administrators, with incentives for improvement could work wonders.
 - More pathways to graduation along with the recognition that elementary districts are left out of additional STARS payments.
 - Hard-coded 'triggers' "be codesigned by policymakers & implementers, not just handed down by legislation." The need for HQIM. And the ongoing professional support for all teachers.
 - Reviewing staffing structures & ANB funding review
 - (not in a particular order) Debt-free pathways for teacher education; competitive AND comprehensive compensation packages with benefits, etc. included; universal pre-k screeners; adopting common definitions; a "roadmap" to implement changes.
 - I most strongly support the emphasis on transforming teaching through a coherent, career-long system of support, paired with early learning investments and learner-centered design that are grounded in Montana's Graduate Profile competencies. The recommendations recognize what educators have long known: that student outcomes are directly tied to the strength, stability, and support of the educator workforce, and that one-off solutions will not address persistent vacancies, attrition, or inequities. I particularly value the call for embedded professional learning, expanded teacher leadership roles that allow excellent educators to remain in the classroom, and meaningful investments in National Board Certification and competitive compensation.

- I support them all. I do think we need to be cautious of roles and responsibilities. Specifically in terms of Board of Public Ed. However, I believe we should work side by side with them on items such as accreditation standards & educator licensure. I also firmly believe we need to keep special education at the forefront. We have heard repeatedly that it is a major issue in every district with financial implications as well as behavioral support needs & staffing.
- Overall, I appreciated the recommendations in the Transforming Teaching and Early Childhood Education / Early Learning sections, specifically ensuring competitive compensation and creating a voluntary, opt-in early learning program.
- I really like the overall document. I support of the transforming teaching recommendations! The research shows that quality educators have a significant impact on outcomes, and we need to make sure we are building a system where the educators stepping in have to be high quality. All of these recommendations lead to a system that supports high quality educators

Misc: Uncategorized Comments:

- ****continued from transforming teaching**** All that said, I do think that encouraging more teacher board certification is a good idea, and am happy to see that Rep. Muskewicz passed a bill doing so.

Q9: Is there any other specific feedback we didn't specifically ask for that you would like to be sure is noted and considered?

Answered: 14 | Not answered: 2

Comments:

- I'm providing you critical feedback, but I also want you to know that I think the world of you all, your expertise, and your work ethic. Thank you so much for working with the Commission.
- At times I felt the facilitators were driving us toward a pre-determined result, based on their wide experience in other states. I know they tried to tailor to MT, but still...
I felt the facilitators excelled in drawing out discussion.
- I am interested in what other team members have to add here, as when listening to the input from the group I value hearing everyone's voice equally.

Q11: Why did you respond to question 7 as you did?

Answered: 14 | Not answered: 2

Comments:

- The group has been collaborative and thoughtful in approaching education in Montana from the variety of perspectives each commissioner brings.
- If #10, yes, I think you've included some really beneficial recommendations, especially the two focused on teacher pay and early childhood education.
- I thought it was mostly policy based. Question 10 I answered in the way I did because I agree with several recommendations but not with others.
- I was just highlighting what I agree with & what I've taken from our sessions as a commission.
- I greatly appreciate the concrete steps to get us started on this work.