IEEWG Report Feedback: Detailed Report

Feedback organized by question

Q2: Now that you've read the overall report, is there any general feedback or reaction you would like to share before we ask you specific questions?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Interesting. In Emma's story, her parents are mentioned a few times but as observers, not as active participants. It appears to me that this is a theme throughout the report. Whenever 'stakeholders' are mentioned, the list should always include parents. I was also disappointed to see few references to student outcomes. I suppose I could have missed it but I doubt it. Measured student outcomes can really be the only metric by which educational programs are evaluated. If that is what was meant by the section on Learner Centered Design it would be helpful to make that crystal clear. After I complete this survey I will try to take time to review the	Will make the edits regarding stakeholders. We will add parents to the stakeholders throughout. We will clarify that Emma's parents are actively involved. We will clarify that measured outcomes are the intent of the recommendations and implementation plan.	

document to see how many times measured student outcomes are mentioned.		
2. With minor adjustments and a few clarifications, this report is in good shape.	Noted	
3. Thank you so much for all of the work you've done to facilitate this phase 1 process!	Noted	
4. More review time would have been appreciated.	Noted	
5. In general I like the report. After a thorough reading I spotted a few issues that caused me to pause.	Noted	
6. The main glaring error is around the understanding of the relationship between lifetime income curves, the STARS act and the aspirational future of teaching. It's just incompatible with the entirety of economic research. To me, it risks poisoning the paper before the jump.	We will raise this as a discussion question.	
7. no	Noted	
8. While this has been an interesting exercise thus far, it seems that the outcome has been predetermined.	Noted	
9. I think the report lacks the mention of collaboration with specific relevant stakeholders, including the Department of	We can clarify the specific collaborators and welcome	

Labor and Industry. I will include specifics later in this questionnaire.	such specific clarifications throughout the report.	
10. Good info - very aspirational. I've learned that change is HARD - we'll see if the legislature, the schools, and the teachers have the appetite to get it all done.	We agree that this is aspirational and that change is hard.	
11. There is a lot of general "increase funding" language, but I don't see much discussion about where the money will come from. Will it be on local districts to raise mill levies? General funds through the state? Could be more focus on the costs and the impact on those paying the costs.	We intend to name the cost drivers for the report in the final version.	
12. Simplifying the funding formula should be a larger focus. There is a crisis regarding the shortage of clerks and the level of knowledge that the current model requires a clerk to implement is egregious. Increasing flexibility in funding needs to be a priority without more strings or reporting required. We do not need additional boards and commissions for governing structure. Less emphasis on National Board Certification, I do not believe this is a great solution. Spend more time ensuring the current early childhood programs are effective before beginning new programs. The current	We will add the shortage of clerks to the discussion of current challenges. We agree that reducing reporting bloat is a priority – resourcing OPI to produce complete reports from data that is already collected will be added to the section.	

programs already have a wide variety of local control options which has caused some confusion on admittance. There are concerns with transporting 4yr The OPI is already creating a clearing house for HQIM, this would not be connected to the Learning Hub. OPI is already currently implementing a new system to register PD providers and analyze their criteria. I agree we can continue to evaluate and coordinate.	We believe stakeholder feedback and technical assistance entities may need to be more robust to increase their ability to be proactive	
13. I think the section on Student Achievement makes me want to point out there are many factors that need to be addressed in this section. Two big factors that have to be addressed to improve student success are attendance and mental health. I think we need to start tracking the attendance patterns of students in correlation to their test scores. Additionally, the mental health concerns of our students most definitely play a role. However, it is much harder to track. It is to the level it needs attention and should be part of the comprehensive reform efforts around student achievement.	We can consider if our discussion of mental health needs additional information. We believe OPI should be well resourced to conduct these types of attendance/ achievement analyses and our data and performance management recommendations should be read as inclusive of this. We will consider edits to this section.	
14. The report reflects thoughtful work and a sincere effort to improve Montana's education system and fulfill our constitutional obligations. However, the	Noted	

implementation framework relies heavily on grants and assumes district-level capacity that does not exist in many rural communities. While not explicitly stated, many recommendations feel directionally similar to consolidation through increased centralization and scale. In education, bigger is not inherently better. Smaller systems are often better able to support student and staff mental health, build strong student–teacher relationships, and provide personalized learning. As systems become larger and more complex, time for these critical relationships is reduced. What is needed is a simple, sound plan with clear accountability, increased base funding for educator salaries across all schools, and full funding of the mandates and expectations placed on districts.		

Q4: Why did you rate the section on Systems Design Features as you did?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Well, the report section on Systems Design Features is, if I'm looking at it correctly, nine pages	We can clarify the type of structures we are suggesting in the report.	

long. I appreciate and agree with the section on page 13 about simplifying the funding formula and reducing time-intensive reporting requirements-two recommendations that I have heard many times. I will send to you page-specific questions and comments that might clarify what I have to say here. Page 15 under System Structures 2nd sentence; "These entities need not be state agencies… " Which private or civic entities are being anticipated here? Then, "Leadership in this sense includes the authority to require the implementation of the recommendations." No, this authority can only be granted to a State agency. Why would we add another quasi-State agency when we already have OPI? So, neither agree nor disagree.		
2. It expresses well the need for the coordination of effort both vertically and horizontally.	Noted	
3. I agreed outright with most of the recommendations and didn't	Noted	

identify any areas of strong concern.		
4. Some of the Commission's expressed key objectives were overlooked. (Lack of specific definitions, accountabilities and over-generalizations.)	We moved the specific definitions from the section on Learner Centered Design to the section on systems design, but can note it in this section too.	
5. Page 13 -"zero based costing" is a terrible idea. Wastes time-is inefficient. We already know how every cent is spent in education. -Our formula is complicated because our state is diverse. Acknowledging that it is as complex as it needs to be is useful.-Page 15. -There is very little mention of local control in all of the governance section. -There is little to no mention of the partner groups in the governance section. These groups have been and need to be integral to the governance structure (first bullet in list of departments). -P16 line 7 "allowing District to enter...." implies limiting local control. P17-"school year" also a local control issue. In general many of the suggestions feel like they lack	We will replace “zero based costing” with a phrase such as “total cost accounting” We can acknowledge the necessary complexities of the formula – to account for diverse districts. We will raise the discussion question regarding local control.	

the local control requirement. Makes sense because we want to have answers, but we still need to ensure we don't encroach. recognize that we have a system that allows innovation and work towards scaling it. Requires investment however.		
6. While many are fine individually, in aggregate they create a non coherent framework.	Noted	
7. Repeated system design changes in recent years have not improved student outcomes. Too high-level.	Noted	
8. They are reasonable although there is no funding connection.	We will raise this for discussion.	
9. Good topics that need to be considered	Noted	
10. I'd give my agreement level 4/10. I think it's generally good stuff, but I'm just not sure it's realistic. I think the politics (state AND local) are just too thick and change is just too hard to get everyone pulling in the same direction. Local control is a cornerstone in the constitution, but it's a real	Noted	

barrier to improving efficiency and effectiveness and it's the elephant in the room. We need to talk about it and rethink how that term is defined and what it means.		
11. I endorse the below wholeheartedly. Use zero based costing for new initiatives, but exhaust funding from current sources when finding pay-fors. Consider simplifying the funding formula	Noted	
12. Lacking simplification of overall structure.	We will raise this for discussion - would need further clarification.	
13. Nothing overly surprising and I do agree with it.	Noted	
14. The systems design recommendations are conceptually sound; however, the implementation plan depends heavily on grants, pilot programs, and additional administrative work. For many rural districts, the limitation is not commitment but capacity. Additional layers of	We will raise this for discussion. Quick note: NCEE suggests that systems design work will need to precede implementation so that new work supplants, not supplements, current work.	

coordination and reporting function as unfunded mandates when staffing and funding do not increase.		

Q5: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Pg 3 Intro-The use of the term “extraordinary clarity” is a stretch in my opinion. I would change to provide guidance. Pg 6 bottom of first full paragraph-read the last sentence and edit for clarity. Pg 6 2nd full paragraph-what are "community skills”? Pg 6 Last paragraph-where do we find the data on which these stats are based? Pg 8 Governance-“formal but nimble statewide structures” Not sure what this means. Pg 9 “The Office of Public Instruction has been supportive of	We will accept this feedback and make revisions.	

this initiative." What initiative? This could be clearer. Pg 10 Third full paragraph-does data support the efficacy of early learning models? I see that there is a reference later in the report but does all the recent data align? Page 11 Which stakeholders are going to be consulted for the refinement process? Pg 12 2nd Paragraph-Should include parents. I will add more notes on this section by email as I am running out of room.		
2. At pages 15-16, this sentence is unclear to me: "While Montana's local districts proudly cherish local control, allowing local final decisions need not require local budgeting, staffing, and implementation."	We will raise local control as a discussion question.	
3. On budgeting, I'm skeptical that zero-based budgeting is a high-leverage reform — it's staff-intensive, easy to influence, and can distract from fixing the big drivers (formula assumptions, inflation indexing, and program	Will remove the phrase "zero based budgeting" and replace with a phrase such as "complete cost accounting"	

effectiveness). I'd prefer targeted program reviews with clear outcomes.		
4. On infrastructure, I recommend explicitly incorporating the IWBI State of Our Schools – Montana (2021) analysis as the baseline for facilities strategy, prioritization, and funding options.	Feedback accepted.	
5. See previous response.	Noted	
6. On page 15, add "partner groups" after health and "human service", line 6 of Governance design features. Page 13 - acknowledge that our school districts are accountable for every dollar spent. Also acknowledge that we have a very diverse state, with nearly 400 school districts, and that requires a level of complexity in the formula. Throughout, reiterate that local control is called for in our constitution.	Feedback accepted.	
7. Add estimated funding.	We will add cost drivers in the final version.	

8. There is a theme in this document for endorsing recommendations that pave the way for universal pre-k, which doesn't seem to be a policy that has achieved a consensus position from the group yet. Account for specific costs for all students when updating the funding formula, from Pre-K students to 21 year old students with disabilities. Currently, the funding formula does not include a specific calculation for pre-k4 students because they were not part of the formula in 2015. Consider different staffing ratios for different age students in any updates to the formula.	Noted Noted for Phase 2	
9. Using concrete examples as shared from ECS and other models from states that recently revamped their funding formulas and simplified them.	Will note for phase II	
10. I would add that for how comprehensive this report is, along with how many times our discussions were about special	We will raise this for discussion. We will ask a discussion question on how to add it.	

education, there is nothing really in the report or recommendations that would address taking a look at special ed. While it is largely a federal regulation issue, local districts should have curriculum and interventions in place to address learning differences. Specifically, behavioral supports and interventions and the sharp increase in extreme behaviors should be included. There should be a deeper dive into how behavioral challenges are affecting the student experience, the crisis, other students in that environment as well as teachers, staff, admin, etc.		
11. Clearly distinguish between base-funded requirements and grant-funded opportunities. • Acknowledge capacity limitations in small and rural districts. • Ensure system design supports, rather than replaces, local decision-making and relationships.	Feedback accepted	

Q7: Why did you rate the section on Transform Teaching as you did?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Actually I mostly agree with this section.	Noted	
2. It calls for a comprehensive approach to improving/elevating the teaching profession.	Noted	
3. I agree overall, especially with the additional context in the staffing redesign and NBCT sections.	Noted	
4. Educator supports excludes detailed discussion about fostering professional pride in student performances. This should include discussion about inventive pay. Also, discussion about year-round schedules precludes post-graduate goals. Does this mean more PIR days?		
5. I agree with what's said, but I struggle to think teachers will collectively embrace the changes proposed.	Thought	

6. This is the core point. If you have a compressed salary schedule you disincentivize every single thing in the transform teaching section. Salary compression indicates that culture/firm specific training has no value, since its accumulation is not compensated, yet most of the transforming teaching section focuses on developing higher performing, highly motivated teachers. You can't incentivize high turnover mercenary behavior and expect you will get what you say you want. Specifically, the idea of master teachers implies lifetime mastery, yet a compressed payscale signals that job accumulated human capital has low value. It's not a circle you can readily square. Let me restate the central problem: If increased human capital has no value, why would teachers invest their scarce time resources to accumulate it?		
7. I see some potential for gains from implementing these proposals.	Noted.	

What is lacking is competition and incentives. The System, with its various players, thwarts meaningful and lively rewards.		
8. The MT legislature has consistently added funds for teacher recruitment and retention during my 9 years of service. It never is enough. I am also troubled by the comment that I heard during one of our meetings that "STARS Act funding was not used by the district for its intended purpose."	Noted. The intention of the plan is to first encourage a research based approach to recruiting and retaining teachers and then considering new funding in Phase II.	
9. There is no mention of the current collaboration with the Department of Labor and Industry, including as it relates to their efforts on teacher apprenticeships. The Legislature passed HB 336 and HB 721 in early 2025 to officially empower DLI to launch new apprenticeship programs for licensed professions, including teachers. With funding secured and programs structured under these statutes, DLI is now	We can include these in the current discussion section.	

spearheading a registered teacher apprenticeship initiative that will directly lead to licensure—shaping a robust, local pipeline of educators in Montana.		
10. I like these recommendations specifically at looking at pathways to educator licensure and continuous support for educators. I am really excited about steps we have taken in MT to build the registered apprenticeship program for educators as well as the internship programs available to 4th- year education prep candidates.	Noted	
11. I don't think there is necessarily consensus around these topics. Implementation is a lot of study, form a task force. I wish we could narrow this and focus on consensus topics even if it reduces the number of recommendations.		
12. We are already doing a lot of work in many of these areas such as residency. Teaching teams and other models are good. There is too much emphasis on NBCT.	Noted	

Good mentorship and leadership training ideas to expand on.		
13. I feel like there is a very strong tone of centralizing the control of pro dev and support for educators to state agencies rather than building systems that support local control of pro dev and other supports. There is a huge missing piece with the lack of Professional organizations. State employees are amazing, and the professionals doing the jobs in schools are also amazing and directly in touch with what needs worked on. There is also a need and desire to have opportunities for pro dev that allows teachers from across the state to collaborate and share experiences. - For licensure I am troubled by the concept of waivers for licensure for the professionals that we will expect to provide high quality instruction and guidance for our students. We need to set the bar high for educators, admin, and other support staff.	We will add a discussion question about local control and our treatment of it. Professional organizations helped with the creation of this list of recommendations. We will ask a question about incorporating professional organizations.	
14. Improving teaching practice is essential, and the goals outlined	Noted	

are appropriate. However, the recommendations assume additional time, training, coordination, and documentation without clearly identifying how that time will be funded or protected. Teachers and administrators are already managing extensive demands. Adding expectations without additional staffing, compensation, or schedule relief contributes to burnout and makes recruitment and retention are increasingly difficult.		

Q8: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Pg. 21 Meaningful career advancement without leaving the classroom. I think this is key. Very often the most talented ambitious teacher has no choice but to go into admin to advance their careers. They make good	We will cite the data on class size.	

administrators but they may have been outstanding teachers. Keep them there. Pg 22 Is there data to support small class size tied to better student outcomes? What were the initial implementation investments in ASU's strategic school staffing models? Does the data support the assertion that MT's teachers are underpaid relative to other college degree options? Does NBC develop or identify a good teacher? I like the section on leadership development.		
2. N/A	Noted	
3. Right now the plan puts NBCT Horizon 1 at years 3–4 and Horizon 2 at years 4–6. I'd recommend compressing Horizon 1 to 12–24 months or skipping straight to Horizon 2 with a limited pilot so we can start testing an up-front support mechanism sooner and learn quickly what actually moves	We will add a discussion question.	

participation and retention, rather than spending multiple years studying impacts before acting.		
4. See previous response.	Noted	
5. No suggestions. I think the report represents the conversation well.	Noted	
6. None. It's a complete structural mismatch.	Will request clarification in the meeting.	
7. none	Noted	
8. Again, need to include funding estimates.	Noted	
9. We should try and avoid using old sources of data, including from former elected officials, such as the teacher recruitment and retention report from the former superintendent in 2023. If we want to use that report, you could instead say OPI data instead of mentioning a former elected official.	We accept this feedback.	
10. No specific feedback, just noting that we should be building on and expanding new initiatives that are working.	We agree.	

11. Narrow discussion.	Noted	
12. Look more at master's degrees and other options to increase teacher salary.	Noted	
13. Include local control and professional driven pro dev that is timely, flexible, and collaborative that includes sharing of ideas in many formats. I would also suggest including strong language that supports highly qualified licensure programs. Pushing for training programs that are rigorous and avoid allowing waivers to fill holes.	We can clarify this in the professional development section. We will add a question on local control to the discussion.	
14. Address educator workload explicitly. Tie new expectations directly to funding for time, staffing, or compensation. Focus on sustainability rather than adding initiatives.	Accepted. We will include educator workload in a more robust section on challenges.	

Q10: Why did you rate the section on Early Learning as you did?

Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. I am not in favor of pre-K formal education to be honest. These children should be with their families. If there are to be pre-K programs, any costs including transportation costs should be borne by the parents directly, not the taxpayers. Page 40 Horizon 1, 3rd bullet-What does this mean?	Noted We will clarify the bullet point.	
2. It provides specific ways to improve early learning.	Noted	
3. Strongly agree — the recommendations reflect the broad evidence-based consensus that high-quality early childhood education is one of the best investments we can make for long-term student success.	Noted	
4. The current and present focus should remain on K-3, 4-8 and 9-12. Expansion at this point	Noted	

should be postponed until we recalibrate the current system.		
5. Of all the sections, I think the Early Learning is the most likely one to get moving, the one people in general are most likely to get behind, and therefore the easiest to actually implement. The transportation of 4 year olds is already allowed by state law (20-10-122, MCA). It's a training and education issue, not something that must be changed to make the system work.	Noted	
6. I was in this group. The suggestions in the group focused on right-sizing the funding formula to recognize a lack of disparate costs between age ranges and the economies of scale due to greater access. This basically suggests universal screening as a prime mover. I don't see that as moving the needle much.	Noted for Phase 2.	
7. Very expensive, and freighted with extraneous world-view implications. Data doesn't support	Noted	

investing huge amounts in this project.		
8. VOLUNTARY participation in 9. Early learning is a positive step as long as non-public providers of early learning receive access to the same funding.	Noted	
10. All of the below recommendations seem to be premature. Early learning programs in Montana are just getting started, and we should evaluate the data before moving forward with such recommendations. Additionally, in another area of the report, we endorse a simplification of the funding formula, and recommendations #1 and #5 seem to run counter to that idea. 1. Update Funding Formulas To Include Early Childhood Education. 2. Provide Upfront Funding To Launch Early Targeted Intervention Programs	We will add a discussion question regarding the simplification of the funding formula.	

5. Provide Transportation Reimbursement For Early Childhood Programming Participants.		
11. Early Learning investments get us our best bang for our buck. Early interventions are the key to success down the road and it is easier to make large gains with children in their early years.	Noted	
12. There should be a more robust discussion of costs and where they come from. For example, the transportation reimbursement will have a cost; who pays and how much? What if it's not feasible once costs are known?	Noted	
13. Take into account and assess current programs. Consider the cost of universal pre- K and the challenges of transporting 4 years old children. This is important and we should continue to explore and consider effective expansion and current design.	We believe the report reflects this and will review and clarify if needed.	
14. I am soundly in the camp of needing a high quality early learning program. I have some	We will edit the comments on the ECE scale as it seems to be erroneous.	

issues with the timeline and think that we can be more responsive in how we roll out options. The first year or two to study seems like a group of students or two that we aren't serving to the fullest. We have systems in place and the ability to scale quickly and I think we should. I also want to acknowledge the section on supporting child care providers during the transition to a full pre-k world. I would add now and will again on the next page that I think our best way to do that is to support childcare options for students that are below the age for pre-k. In horizon 2 for ECE I was intrigued by the concept that ECE educators be on a separate salary schedule. I don't know the origin of this comment, but this is a local control issue again and seems astray.		
15. Early learning is a critical investment, and the emphasis is appropriate. However, rural communities face workforce shortages and limited administrative capacity that make	Noted	

grant-dependent models difficult to sustain.		

Q11: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. I don't agree with early literacy and numeracy for pre-K children. They should be with their families. If there are to be pre-K programs, the costs, including transportation, should be borne by the parents, not the taxpayers in general. And the programs should be voluntary. Page 40 Horizon 1 3rd bullet-What does this mean?	Noted	
2. At pages 35-36, I do not agree with the assertion that screening required for the current early intervention program is onerous. And as currently written, one might think the report screening will be deemphasized if admission to the program is expanded. Screening of children for reading/ math readiness upon the start of their education is essential for later analysis of individual student progress/proficiency	Feedback accepted.	

and of the effectiveness of educational programs. Please rework this section to ensure that we don't unintentionally devalue screening (and assessment).		
3. Move faster by compressing the early conditions/capacity phase and getting to implementation sooner. While I support helping community-based providers adapt and avoid market disruption, that support should be limited to transition/coordination/technical assistance — we do not have consensus about using public school ANB (or other K–12 formula dollars) to pay private providers for delivering ECE.	Noted	
4. Again, see previous response.	Noted	
5. No suggestions. I think the report represents the conversation well.	Noted	
6. As with last time, flatten the formula across age levels.	Noted	
7. none	Noted	
8. Include funding estimates.	Noted	
9. Not much, but I do have concerns about feasibility of implementing some of these recommendations	Noted	

10. Just keeping focus on what is best for individual communities and encouraging partnerships and opportunities to expand or start up, but not designed to compete or close existing facilities. Collaboration and supporting ALL communities across the state to ensure access to quality early learning opportunities.	Noted	
11. Remove the recommendations	Would need more clarification.	
12. already stated	Noted	
13. I would suggest adding a bullet to horizon 1 to expand access for all students in year one. -I would suggest striking the comment about salary schedules. Feels way too specific for this work. -In Horizon I am troubled by the last bullet. This policy would appear to exclude students from participating. I think it lands on districts to find a way to provide this service and we should be expecting and supporting that. -	Feedback accepted.	
14. Include rural-specific implementation considerations. • Reduce reliance on short-term or competitive grants.	Noted	

• Address workforce sustainability directly.		

Q13: Why did you rate the section on Pathways to Graduation as you did?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. I found some good things in this section.	Noted	
2. no comments	Noted	
3. Goals are sound, but the section feels underdeveloped and weighted toward middle school, so it's hard to assess impact or implementation risk.	Noted	
4. I'm not convinced this should be an objective at this point. There is no evidence that this effort is coordinated with ongoing Montana programs (e.g., Tax Credits for Trades and Education Training).	We will clarify that the effort should be coordinated.	
5. I think middle school is too early for kids to be worrying about their careers. AI says that 75-80% of college kids change their majors and people	Feedback accepted. Career exploration in middle school should be geared towards providing students with a broad	

change their careers at least 3-7 times. I think middle school is the time to learn basics and be exposed to different topics and activities, but I don't think middle school career exploration is the best place to invest taxpayer money.	exploration of the types of careers and we will make an edit to clarify this point.	
6. You will not be surprised to hear that I think treating middle school more like a job placement agency is a reprehensible idea.	Feedback accepted. We will clarify that middle school career exploration should be a broad exploration and not a narrowing.	
7. Academic skills must precede these otherwise beneficial adaptations. And the entire package of working group findings shirks this emphasis.	Feedback accepted. We will make clear that the recommendations round career exploration are included with a strong program of foundational academic knowledge.	
8. Graduation is obviously the goal, but proficiency must be demonstrated.	Noted.	
9. I support auditing current funding available prior to endorsing a recommendation that we should increase funding for middle school pathways.	Noted.	
10. I like the emphasis on supporting and funding programs in Middle School. That can be the best way to build programs at the high school level and	Noted	

provide a wide range of options for students, specifically in the area of CTE.		
11. I generally like the ideas and recommendations here, but I do have some concerns about what costs are going to come up during the research for possible implementation and the associated risks that those, once known, could derail implementation.	Noted	
12. Need more focus on high school. May be over emphasizing the practicality of replicating transformational learning. Portrait of a graduate is a valuable as the leaders and community believe in it or continue to focus on it.	Noted.	
13. This pathway seems good to me.	Noted.	
14. Expanded pathways align well with student needs; however, many require coordination and oversight that small districts struggle to provide without additional staffing.	Noted. The current challenges section will be edited to more broadly discuss staffing capacity.	

Q14: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. Page 45 What data supports Middle School Pathways Career Exploration? I am not arguing that we shouldn't do this but clarifying this might be helpful for someone reading this report. Page 45 Who conducts the audits? Page 46 First to second line-What other protected statuses does the author have in mind? Page 48 Horizon 2 second bullet-change ware to aware. Page 49 Horizon 3 Anticipate impacts- consider changing to all stakeholders sharing common understandings...	Feedback accepted.	
2. How can we recommend increasing overall funding for middle school pathways below prior to conducting an audit? Isn't that the point of the audit? Suggest striking or including a recommendation up front to audit the funding prior to recommending an increase.	In the systems recommendations we suggest full cost accounting and also identifying available funding prior to expanding funds. We can raise a question as to whether this is sufficient.	

3. Strengthen the high school side with clearer commitments and consider revising partnership language so outside firms support programming without driving governance, staffing, or creating funding conflicts.	Feedback accepted. We can clarify the partnership language.	
4. This goal/objective needs more development.	Noted	
5. No suggestions. I think the report represents the conversation well.	Noted	
6. None.	Noted	
7. none	Noted	
8. Provide funding estimates.	Feedback accepted	
9. N/A	Noted	
10. Great work is already underway in MT. It is just about ensuring the funding and PD are available to continue this work and expand to ensure that every school district has the resources to provide multiple pathways to their students. Again, collaboration and building upon what we are already doing should be a key focus.	Noted	

11. Maybe we can add to the implementation plans a goal to identify ongoing, sustainable sources of funding?	Feedback accepted. This may fit best in the systems section.	
12. Strengthen emphasis on high school.	We will raise this as a discussion question.	
13. I would suggest in horizon 1 for increased funding to add some acknowledgement about class size and increased expense for smaller class size.	We will raise a class size point of discussion.	
14. Provide scalable models suitable for small districts. • Identify stable funding for coordination and partnerships. • Clarify expectations to avoid overburdening districts.	Noted	

Q16: Why did you rate the section on Learner Centered Design as you did?
Answered: 13 | Not answered: 2

Comments:

Commissioner Comments	NCEE Response	Notes
1. I like most, if not all of this section.	Noted	

2. Using the results of the current Transformational Learning program and input from the field to provide districts a "roadmap" for implementing proficiency-based learning is essential if we are to promote change across the state.	Noted	
3. Direction is fine, but the plan is mostly a roadmap to a roadmap with long horizons and not much near-term, actionable change.	Feedback accepted.	
4. The reference to "more proactive guidance" lacks specificity. I would expect to confirm detailed itemization of which agencies/partners participate.	Feedback accepted.	
5. I think the definitions--particularly of 'proficiency' need examination. As I've mentioned, we deem students 'proficient' in a topic and move them to school to get to college/career faster; however, what we really want them to demonstrate are the qualities in our graduate profiles. Those are not the same thing and we do not have alignment there.	Feedback accepted. We moved the discussion of definitions to the systems section but we will add back a bullet point here.	
6. It really doesn't say a ton. I do agree that we need better definitions.	Noted	

7. This is an area where competition and individual achievement can motivate students to excel.	Noted	
8. This is the preferred method of educating our students.	Noted	
9. support the goals, just anticipate it will be challenging	Noted	
10. I really support learner-centered design, but completely agree that we need to work to ensure we have common language and goals. This will require on-going education and professional development for teachers, admin and school boards. A higher level of education and knowledge on what local districts can do to provide flexibility and learner-centered environments is a must.	Feedback accepted.	
11. I think these are pretty common sense ideas and should be a normal part of trying to improve outcomes. Specifically the roadmaps as a tool.	Noted	
12. This is a heavy lift, and I have a vague understanding of how it will impact education outcomes.	Noted	

13. This one is big and ambitious and without resources will be very hard to accomplish. Transition takes resources	Noted	
Learner-centered design depends on time, trust, and strong relationships. As systems grow larger and more complex, educators spend more time on compliance and coordination and less time with students. There is concern that implementation at scale may unintentionally reduce personalization and negatively affect student and staff mental health.	Noted	

Q17: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

1. N/A	Noted	
2. n/a	Noted	
3. already noted	Noted	
4. Aside from the above response, there's a typo under Horizon 2, 2nd bullet ("...school boards are Aware of necessary policy updates."	Feedback accepted	

5. No suggestions. I think the report represents the conversation well.	Noted	
6. None.	Noted	
7. none	Noted	
8. Provide funding estimates.	Noted	
9. None	Noted	
10. Increased PD for teachers, admin and school boards to get everyone on the same page is vital.	Feedback accepted.	
11. I would like to see resource needs explicitly put into the horizons so it is obvious. Pushing a school district to change without support will lead to failure.	We will raise this as a discussion point.	
12. None	None	
13. Compress the timeline and add a small set of concrete Horizon 1 deliverables that districts can use immediately (model programs, sample competency/graduate-profile rubrics, and a short menu of successful flexibilities), backed by targeted technical assistance to remove known implementation barriers.	Feedback accepted.	

14. Align learner-centered goals with realistic staffing and time expectations. • Minimize additional documentation requirements. • Emphasize relationship-based outcomes.	Added.	

Q19: What would you like to discuss, specifically, for your 2nd highest priority?
Answered: 11 | Not answered: 4

Comments:

1. How realistic it is--and if it's NOT realistic, what next steps we can reasonably take so start moving in that direction.
2. Ranking is hard as I believe they all overlap each other. They are pieces to a puzzle and if something is missing it won't be complete.
3. Not sure.
4. I'd like to discuss school facilities and special education — both feel underdeveloped relative to their real-world budget and equity impact.
5. Focus on accounting primals vs fictions. Understand that while fictions are necessary, primals need to be viewed as the underlying reality driver.
6. Teacher pay and measurable student performance testing results.
7. The top and missing priority is simplifying and adding flexibility for schools on the funding formula.

8. The Governor has stated his goal of reducing income tax in MT. If that comes to fruition, how will it affect funding for education?
9. Narrow recommendations, if possible, and consider steps during implementation if funding measures are determined to be unfeasible.
10. Governance: Discuss how important setting this foundation is for effectively implementing the other recommendations. Introduction and Front Material: I have some suggested changes (as may others) that may spark a bit of conversation.
11. Ensuring we are including relevant stakeholders and initiative in the report, such as DLI and their teacher apprenticeship program.

Q20: What would you like to discuss, specifically, on the 13th for your top priority?
Answered: 10 | Not answered: 5

Comments:

1. How to assure that we are moving toward rigorous standards for educator prep programs and licensure pathways. We have put some band aids in place that worry me for the quality of licensed educators in the state. These band aids were meant to address teacher shortage, but can't be the long term fix.
2. Local control and school structure.
3. Next steps on the funding formula and design to build capacity for clerks. Discuss special education and EL student needs as a multiplier for funding. There are components such as SPED and EL's that are not included enough.

4. I want somebody to make a solid theoretical argument that explains the world in which a compressed lifetime payscale is compatible with any of the aspirational teacher goals.
5. Curtail expansion of regulatory requirements; justification of expanded spending; acknowledge parental responsibilities/accountabilities; acknowledge, thru honest discussion, the mental health crisis and biological (hormonal) changes occurring during the teenage years.
6. I'd like to discuss student achievement using comparative, norm-referenced assessments (NAEP, ACT) to agree on a shared baseline, then identify the 2–3 most impactful recommendations we can execute in the next 12–24 months (teacher quality/retention, early literacy/early learning, and targeted supports for American Indian students, SPED, and ELL).
7. Funding sources.
8. Narrow topics if possible and consider adding alternatives in the implementation section if studying the issue runs into roadblocks.
9. Learner centered models from other districts and how those districts train their staff and community.
10. Whether the group is comfortable with endorsing a path towards state-funded universal pre-k. Since preschool is optional in Montana, state-funded transportation for non-compulsory programs sets a precedent that may be unsustainable.

Q21: Is there any other specific feedback we didn't specifically ask for that you would like to be sure is noted and considered? Please include feedback on the Introduction, Context, etc. here.

Answered: 13 | Not answered: 2

Comments:

1. I ran out of room in the beginning sections so I will place that feedback here instead of sending an email.	The Montana Graduates Profile list comes from OPI data on the Cumulative	

On page 19 the second bullet under Montana Graduates Profile is problematic. I suggest striking out that bullet and replacing it with Citizenship. I would recommend this to you in the strongest possible terms.	Graduate Profiles. A citation will be added.	
2. Introduction and Context: 1. page 6: "These human skills include not only core skills like the interdisciplinary fluency to solve complex problems and apply learning in new contexts." "Core skills" should include mathematics, reading, and writing. 2. page 7: I think it important to note that since 2015 NAEP scores have generally declined nationwide and in Montana, which suggested larger social dynamics may be in play. 3. page 8-9: Other "recent efforts" that should be highlighted. Check with Pad for details. 4. page 10: ". . .entities that hide the complexities of many different institutions and processes from the casual observer and allow them to have a unified experience." This passage is unclear, and use of the word "hide" implies that something is being withheld from the public. 5. page 10: The quote "virtuous cycle of	Feedback accepted.	

educator workforce policy" may strike the reader as being odd because of an unusual (but technically correct) use of the word "virtuous."		
3. The current draft references state proficiency rates (which are useful for Montana accountability, but hard to compare across states and easy to argue about). I'd recommend we anchor student achievement in norm-referenced, comparative measures: NAEP for grades 4/8 and ACT for high school. The report flags inflation as a challenge, but it understates the true impact: the statutory 3% cap on the inflation adjustment has created a cumulative gap versus actual CPI during and after the recent period of high inflation. The draft notes that Montana's maintenance backlog and infrastructure costs have downstream effects on policy, but I would reference the IWBI report that shows that Montana's K-12 facilities have an estimated $9B replacement value, and "good stewardship" funding is benchmarked at 7% of CRV (~$614.9M/year), but districts' combined operating and capital spending was	Feedback accepted. We will add a discussion question regarding inflation. We will reference the 2021 report.	

$298.5M, leaving an annual gap of roughly $316.3M.		
4. Not sure about the priority placed on the introduction's "Emma's Journey." (It adds two pages to this lengthy document.) Also, due to the volume of report acronyms, a list of such would benefit readers.	Noted.	
5. Thanks for leading us through this work - I appreciate your insights and perspective!	Noted	
6. Sorry for being a sourpuss. I just think that this document is a roadmap only if it is a road that leads somewhere. I think you guys should take the hard route and tell us what is real, not what you think that the general powers that be want to hear.	Noted	
7. The story of Emma was a little light on how AI is going to improve and challenge outcomes. The report is strong on education wonkery and light on improving student outcomes. We have enough data to know that "the system" is not working for more than half of Montana students. This should have been a bigger part of the discussion.	Noted	

8. None	Noted	
9. n/a	Noted	
10. Just a comment that we need to look deeper into special education and how it fits into all the topics and recommendations we have covered/included.	Feedback accepted.	
11. I think you asked everything	Noted	
12. The information in the student achievement section was outdated and the new efforts underway are not discussed. It is policy focused without discussion of how it will be funded.	Noted	
13. I think I was pretty thorough :)	Noted	

Q23: Why do you feel as you do regarding the plan's effectiveness at helping Montana fulfill its constitutional obligations?
Answered: 13 | Not answered: 2

Comments:

14. It represents a comprehensive and coordinated effort.	Noted	
15. n/a	Noted	
16. I do not know that these concepts will increase student outcomes in	Noted	

Montana. We need charter school solutions. More emphasis on parents and research and evidence-based levers that lead to change.		
17. This report tends to avoid the primary consternation that our educational system policy is not concise. The language promotes an abundance of opportunities to continue debate among players, without addressing successful STUDENT outcomes, particularly in the realm of standardized test scores and post-education employability.	Noted	
18. I think it's unreasonably aspirational.	Noted	
19. I think we need to be challenged to do better, not coddled. To me, this isn't that.	Noted	
20. What really motivates teachers, parents, and students is left out. Incentives.	Noted	
21. Educational choice is provided for in our Constitution and should be considered.	Noted	
22. Adopting the plan doesn't in itself do anything. Implementation strategies	Noted	

are OK but there could be unforeseen issues with getting an idea/recommendation to full implementation.		
23. We have a system that feels like it is falling apart. We do have a constitutional obligation and it must be addressed.	Noted	
24. First, I have some concerns about the way the plan is written. With changes I would feel better. I also am concerned that we are going to do all of this good work and then not provide any new funding that is needed to make many of the changes. I won't rant about this :)	Noted	
25. It appears as if the plan, if fully implemented, would substantially increase our tax burden. Having heard, in spades, my constituents' frustration with their tax bills already, I couldn't support even a modest increase in funding over the 3% inflation allowed under statute. If we had unlimited funding sources, I still wouldn't support all of the proposals enclosed in this report, as I have already indicated.	Noted	
26. I strongly agree because the plan focuses on the highest-leverage drivers of	Noted	

constitutional adequacy and equality: earlier and more effective learning supports, a stronger and more stable educator workforce, and system design changes intended to make outcomes less dependent on circumstances beyond students' control.		

Q24: What suggestions do you have for minor report edits that would help address your feedback?
Answered: 13 | Not answered: 2

Comments:

1. Don't really have any.	Noted	
2. N/A	Noted	
3. Compress horizon language to 12–24 month deliverables to reflect our biennial legislative cycle and the fact that we want to make progress before we lose momentum. Give SPED its own short subsection (even if we're not proposing solutions yet): define the problem, name 2–3 near-term actions, and include a simple reporting recommendation. Provide a recommendation regarding what we should do in the interim between	We will ask for clarity on this. Feedback accepted.	

decennial studies — should this be more of an ongoing effort?	Feedback accepted. We will make this explicit within the systems section.	
4. See the above responses.	Noted	
5. No suggestions. I think the report represents the conversation well.	Noted	
6. None	Noted	
7. none	Noted	
8. None.	Noted	
9. n/a	Noted	
10. .	Noted	
11. When discussing implementation, consider having a pivot or stepping off point if it is determined in early stages to not implement a recommendation.	We mention this in the systems section but can consider how to make it clearer.	
12. complete	Noted	
13. Perhaps being totally clear somewhere that it will take more resources to achieve most of the recommendations we have, and to also expressly state that not properly resourcing these recommendations will leave us in a spot similar to where we currently are. Not thriving.	Feedback accepted.	

1. Teachers and administrators are already being asked to do more than time and resources reasonably allow. Continuing to add expectations without stable funding and staffing support contributes directly to burnout and staffing shortages. 2. A successful plan must prioritize competitive salaries, clear accountability, fully funded mandates, simplicity in design, and respect for smaller, relationship-driven school systems.	Noted	