

**Administrative Rule Hearing
Public Library Standards**

**September 10, 1999
State Library Conference Room**

Hearing Officer:

Karen Strege, Montana State Library

Attendees:

Marilyn Trosper, Polson City Library
Bonnie Williamson, Havre-Hill County Library
Debbie Schlesinger, Lewis & Clark County Library
Nora Verpoorten, Taxpayer

Montana State Library Staff:

Diane Gunderson
Bob Cooper
Amanda Broadwater

Strege: Good morning, Ladies and...Ladies. This is the time set for the public library, for the public hearing on public library standards which was published in the Montana Administrative Register on August 12 of this year at page 1724. My name is Karen Strege and I've been appointed by the commission to preside over this hearing today as hearings officer.

Before I begin, I have about three pages of stuff to read to you that's required by state law, so I'll just read it. Some I need to read verbatim, some I'll just use as a guide and paraphrase, but you have to all listen.

At this time I'd like to introduce the State Library Staff here: Diane Gunderson and Amanda Broadwater. We're thinking that Bob Cooper will be joining us, too, later on.

The purpose of this hearing is to obtain public information and comments concerning these rules. This is not a contested case proceeding. Witnesses may not be cross-examined or questioned.

This hearing is being recorded so that we can have an accurate account of the testimony presented, and will be able to sufficiently respond to all the comments when we prepare our final notice of rule adoption.

All persons making statements, please state your name before making the statement. If you are representing some organization or entity, please indicate who that might be. If you're making comments from a prepared statement, please provide me with a copy of that statement at the conclusion of your presentation so that it can be entered into the formal record of this hearing.

There will be time allowed after the presentations for questions. State Library staff will attempt to answer those questions at this hearing, however, you may ask questions later. Address questions to me at this address, and I'll provide that to you if you need that.

The order of presentation which is set by state law is the following. I will read the Code Committee Statement into the record. State Library staff will open with an overview of the proposed rules that are before you today. Any Proponents will be allowed to speak, and proponents are those in favor of the rule. Any person with an amendment to the rule is classified as an Opponent, and that's kind of strange but that's the way state law says, and will speak first. So we'll do opponents first, and Opponents means those with any changes, ok, that doesn't mean you're opposed to the whole thing. So you'll get the chance to go first. Other opponents will speak, and then Proponents, and then we'll close the hearing.

The record for this hearing will remain open until September 17. If you have additional written comments, you can send them to me either by Email, Fax, or at the State Library address.

Any person wishing to be placed on the State Library's permanent mailing list to receive information regarding this rule or any other rule, should contact me in writing, and I think that you all here, and all public libraries, are on this list anyhow. All public libraries did receive a notice of these rules according to state law.

Now I have to read a few paragraphs called "Notice of functions of the Administrative Code Committee." The committee reviews all proposals for adoption of new rules or amendments, or repeal of existing rules filed with the Secretary of State. Proposals of the Montana State Library are reviewed only in regard to the procedural requirements of the Montana Administrative Procedures Act (MAPA).

The committee has authority to make recommendations to an agency regarding adoption, amendment, or repeal of a rule or a request that the agency prepare a statement of estimated economic

impact of the proposal. In addition, the committee may poll the members of the legislature to determine if a proposed rule is consistent with the intent of the legislators, or during a session, introduce a bill that repeals a rule, direct an agency to adopt or amend a rule, or a joint resolution recommending that an agency adopt or amend a rule. The committee welcomes comments from the public, and invites members of the public to appear before it or to send in written statements in order to bring to the committee's attention any difficulties with the existing or proposed rules, and I have the address of the committee here, should you want it. That completes the Administrative Rule Committee required statement.

I think that means, that if you have any difficulties with the rules, that I am not, and the Commission is not able to address, you have another step along the way. You could go to the Administrative Rule Committee and they will listen to your comments on these rules. It also means to me that the legislature has control over us, because it could change the law and require a rule change during the session, so this is never a final process. These rules we may adopt at the commission meeting in October are never final; they're always subject to change.

You were all sent a copy of the rules, and we'll go over that just briefly now. I won't go over the first few sections because in that we are deleting all previous standards in the rules. Current rules have all, I think it was written in '83 or in the '80s sometime, standards, and we're not adopting those, we're repealing those rules. They never were, in my opinion, an enforceable rule; they just set up a standard for libraries to achieve, but they were not tied to state aid. They were just statements of standard. The first one, two, three, four and a half pages of this document are repeals of existing rules. And in the middle of page...what's numbered 1727, under number three, you can see that the new rules start.

Rule number one is public library standards, and it does state that now this set of standards are tied to public libraries receiving state aid payments, and I think you all know what these are by now, but I'll just go over them briefly.

- ◆ The library is legally established.
- ◆ The board conforms to all applicable laws, rules, and regulations.
- ◆ The libraries which serve more than 25,000 employ a library director with a graduate degree in library or information science, or its equivalent.

And then, underneath that, it tells, the rules tell how the commission will determine that equivalency, so that's a process.

Number "d" is:

- ◆ Libraries that serve less than 25,000 employ a library director who is, or will within three years of hire, be certified through our state certification program.

Number "e":

- ◆ Paid staff person is present during 90% of all open hours.

"F":

- ◆ The library submits the statistical report to the State Library.

"G" is the minimum hours requirement. There is more underneath that requirement that talks about branches: how do you count branch hours, and then what do you do if a library has summer hours that differ from its winter hours?

"The library has a telephone and answers telephone inquiries" is the last mandatory rule.

Going on to rule two, it says how the State Library will determine if libraries meet these standards, and we're going to ask that the library director and the library board chair sign a certification letter. That's how we'll determine that.

Deferrals. Any library may request a waiver from the State Librarian in writing by August 25 of each year, and the State Librarian may grant a waiver of any of the standards if, and these are the conditions:

- ◆ The library certifies that application of these standards would cause a hardship.

That's generally going to be probably economic hardship, but the library must also provide a compliance plan by which the library will meet the standards within three years. So a deferral will only be given for a certain amount of time, it would be not an ongoing deferral because of economic hardship. And then "b," on the top of 1729, page 1729 is a grandmother or grandfather clause for librarians who are working in libraries now that don't have an MLS.

- ◆ The final arbitrator of the rule is....hi, Nora.

Guest: Good morning.

Strege:

For any question is the State Library Commission. The buck stops at the State Library Commission. And then the appeals process is in rule five, and I won't go over that in detail other to say that I'm, well, as in anything, I'm willing to hear and eager to hear your opinions about this, but it's based on the appeals for LSCA grants. LSTA grants. It's pretty much the same that the State Library has put here.

Rule six on the bottom of that page requires a statistical report. Number "b": we can't require new things, just on the drop of a hat like Diane always wants. That would cause you hardship in collecting that information. We have to give you sufficient notice so that you can collect that information, and it's not Diane who wants to do that, it's me [inaudible].

The effective date of these rules is July 1, 2001, which is not next year, of course, it's the year after. And the effective date for certification requirement is July 1, 2002, and that, we thought, would give libraries ample opportunity to become certified through our certification process.

Rule eight, on the back page, states that the Commission has adopted a number of standards, but because they are not required of libraries, they are not in the rules anymore, but we will provide you with a list of those standards in some introductory material and some appendices in a document to be probably sent out in November of this year. And it also says that a full set of standards can be found on our web page.

Then again, this isn't the last page [inaudible] a little earlier. The repeal and adoption are proposed for the following reasons, and this goes through the process by which the State Library set these standards. There was a joint committee of MLS [sic] staff, primarily myself and Darlene, and MLA public library division staff and we worked together for about a year and the commission approved the standards. There is a misprint here. In "d" you might want to take a note, "4(d)" the Montana State Library Commission through the public library standards, not in January 1999, but on December 4, 1998, or December 11. I'll check on that. If you see any mistakes like that, please let us know. And then it just gives the rationale of why we feel standards are important:

- ◆ Provide a tool to assess the quality and effectiveness of a library;
- ◆ Help each library determine areas to improve;
- ◆ Aid each library in taking an active role to gain maximum community support;
- ◆ Provide a basis of collecting useful statistics; and
- ◆ Provide for additional accountability in the use of state monies for Montana libraries.

And then it goes on to talk about again, the rule making process, and kind of why we're here today. So with that, I'd like to open up the hearing and have Proponents first. We ask you to state your name, for the record, organization, and provide us with a copy of the prepared statement.

Guest: Sorry I was late. Parking around here is kind of difficult this morning. I had to walk half a mile. You all know me. I am no longer a trustee of the Plains Library, however, having been a trustee for a number of years, I probably have a little more knowledge than most concerned taxpayers, and a concerned taxpayer is what I am here as. **[Guest identified by staff as Nora Verpoorten]**

First of all, I have a...there's a statement in here that the...this was brought to Montana Library Association and I know it was because I was at that meeting of the Montana Library Association. I was at at least two federation meetings when this was brought up, and all of us brought several concerns to those meetings, and those concerns...it's implied that the input was taken from those meetings, and incorporated into the policies, but I have never seen any change in the policies that came from those concerns that we voiced.

Strege: Could I interrupt you just one minute, Nora? I just want to make a process statement. It seems to me that you're talking as an Opponent.

Verpoorten: I am talking as an Opponent.

Strege: Okay, I asked for Proponents first.

Verpoorten: Oh, I thought you said Opponents.

Strege: No, that's okay. I just need to keep the...you know, because this is a legal hearing, I need to make sure that people that are Proponents get an opportunity to speak before Opponents, and then we'll go right back to you.

[pause]

Ok, hearing no Proponents, we'll continue with Nora's comments. Thank you Nora, I'm sorry to interrupt.

Verpoorten: That's fine. That is my first concern because this implies that this was accepted by the general populace and by the general library community, and while there are certain areas that I think are good, I object to the implication that it was accepted, and I object to the implication that public input was taken and used, because I did not see that the public input, the input that we gave, was used. I did not see that. At any time.

Ok. It is obviously too late for us to change the standards simply because the Montana Library Association has already, or the Montana Library Commission, has adopted them. I wonder how much of our input the Montana Library Commission got. That again, is beyond what we can do now.

The major concerns I have right now, are, first of all, if a library is unable to meet those standards, and many of them will be unable to meet those standards, simply because of budget constraints, if a library is unable to meet those standards, the money is withheld from the library, where is that money going to go? Because this money was allocated for aid to libraries, and where is that money going to go? And that's a main concern I have.

[multiple people talking simultaneously]

Strege: I'm really sorry, Nora. This is my first administrative rule hearing, and so I was asking Amanda if I could respond to you now, or if I have to wait until your whole statement is over. What would you prefer? Maybe I'll ask you that. Would you like me to respond to your questions as you go through them, or...?

Verpoorten: I would like responses to the questions as I raise them.

Strege: Okay. And your first...

Verpoorten: Where does the money go if it does not go to the libraries?

Strege: It is my assumption that the money will go to the state aid "pot" and be divvied out toward other libraries, according to the per capita per state aid.

Verpoorten: Could we get a ruling on that, that it does do that?

Strege: I don't know if a ruling would be the right term, but I'll look into it, and ask our attorney. I'll get you that information back. By the way, Nora, we're taping this so that's why I'm not taking notes right now, and Amanda's taking notes, too.

Verpoorten: That's fine. I'm used to being on tape.

[laughter]

Verpoorten: Okay. My next issue that I would want to raise. In 1987 there was an Attorney General's opinion by Mike Greeley stating that library boards have sole control over library budgets. In 1999, there was an attorney General's ruling by Joe Mazurek that library boards have sole discretion over library budgets. How in the world in any administrative rules can you get around that? How can you say the State Library has the right to tell you how to expend your monies?

Strege: We have...the Commission has the authority to set standards...
[inaudible: multiple people talking simultaneously]

Verpoorten: They have the authority to set standards, but I don't think they have the authority to overrule the law and the law is, and has been interpreted twice, by two different Attorneys General that the library boards have the sole discretion over library budgets and I don't see how you can get around that and I would like to know have you asked the Attorney General, what would be his opinion if a library came in to the Attorney General and asked for an opinion, have you asked him what he would say?

Strege: No. What I did ask, Nora, was if the Commission has statutory responsibility to set rules for the disbursement of state aid. Yes, they do.

Verpoorten: They don't have the statutory authority to change laws, though, and it's the law that the Attorney General rules on.

Strege: I understand that, but they have the statutory authority to make these rules over the disbursement of state aid.

Verpoorten: Yeah, I know. I've read the law. Over and over and over. I still don't think you can get around the State Library saying, Okay you have to spend this much of your budget on salaries to meet a certain commitment. I don't see how they can do that.

Strege: I don't have an answer for you, Nora.
[inaudible: multiple people talking simultaneously]

Verpoorten: I know you don't. My question is, have you asked the attorney general? What his ruling would be if a library came, and a library is going to come and ask it, I can guarantee you that.

Strege: Well that will be interesting to see what the ruling is, when a library comes.

Verpoorten: Another question I have was, when you were in the process of setting the standards, was the input, actual input taken that was taken from concerned libraries, was it given to the Library Commission?

Strege: Gee, I would have to go back in my notes and see how we gave them that input.

Verpoorten: I sent a three-page fax at the last meeting that they had before they adopted these standards. I was...I...wanted to be there but something happened and I wasn't able to get there. And a very serious and let's face it confrontational statement, and I never got any response, and I asked for a response.

Strege: I am going to have to say I don't remember, but I will check on it.

Verpoorten: And one of the things I said was, okay, if you are going to say we have to meet these standards, and we have to expend this money, then I expect every member of the Library Commission to be in the state legislature asking for a different...funding authority, and I would like to know, was anybody in the Library Commission at any legislative session?

Strege: You're asking me that?

Verpoorten: I'm asking anybody.

Strege: Yes, they were.

Verpoorten: Were they...were they taking the concerns about library funding to the legislative session?

Strege: Yes they were, and the Commission sponsored three bills this session. One gave the ability of libraries that are at their maximum mill levy, like Debbie's library...

Verpoorten: And ours.

Strege: ...to ask the voters to increase the library levy for an indefinite amount of time. So that was one way, one small way, perhaps, whether it will have significant differences to Lewis & Clark Library and perhaps libraries like yours.

They also sponsored a library district bill that would have provided another option for library funding for local communities to take advantage of. Unfortunately, that didn't pass. The Library Commission, Nora, is very concerned about library funding at the local level. And I will look at...

Verpoorten: Well that's probably all I have to say right now. Anybody else can mouth off right now.

Strege: ...and Amanda will, you and I will make sure that Nora's...track down that fax, and see if the Commission had any response to it.

Broadwater: I don't know about any response, but any comments that we received regarding these, I think we provided them copies before.

Strege: Right. But we'll check on that to make sure that happened. Also, Nora, would you be able to tell me when that fax, I don't care about a day, but in general...

Verpoorten: It was August 17th at the Commission meeting up in Whitefish. August 17th of 1998.

Strege: And we met in Miles City in October.

Verpoorten: No, August.

Strege: August. Okay, in Whitefish.

Verpoorten: You had a meeting in Whitefish on August 17th. I wasn't able to get there. I was going to go until the night before and I discovered I couldn't, so.

Strege: Any other Opponents? Again, Opponents just changes minor errors or big errors, or anything that you would like to put on record about these proposed rules.

Verpoorten: Are we able to comment on the standards themselves, or just the rules? I thought we were only able to...only allowed to comment on the rules.

Strege: Because the standards, the mandatory standards are listed in the rules, please go ahead and comment on them also. They're a part of the rule making process.

Verpoorten: There is one rule, which we consistently, in all the meetings I was at, questioned. Why is the gap from 3,500 to 10,000? It doesn't make sense to a library who serves, supposedly 3,501 patrons, which is our 3,511 is ours. And I'm sorry, I mean, I can't, I can only talk from my own perspective and that's the facts I have. Why is that library expected to meet the same standards as a library that has 9,999 patrons? And that's one of the things that we consistently brought up when these standards were proposed. In MLA, when they were proposed in the federations, and we consistently said, that doesn't make sense that a library with only 3,500 patrons has to meet the same standards as a library with just under 10,000.

[pause]

Strege: I'm thinking, Nora. I'm trying to remember the rationale behind this.

Verpoorten: I'd like to hear a rationale. I can't imagine a rationale.

Strege: I think we divided this up, and Diane, correct me if I misspeak here. According to the way that we report the statistics and population to the feds, is that true?

Gunderson: Service area...legal service area population.

Strege: And this is the division that is commonly used here in Montana, as well as, can we say, in the nation?

Gunderson: Yes.

Verpoorten: From 3,500 to 10,000?

Gunderson: Because the majority falls in...not in...they're not based in...you have the 3,500 and then you may have a 4,000, but then you have a 6,000 and you have an 8,000. So they're not...it's not a defined area, where you could have done...you could have done simple little ones...6,000 and 7,000, but then you're defeating your purpose on even setting the guideline for it. So we had to break it off into what it was, the average on going on the service area population.

Strege: Yeah, and we did an average...

Verpoorten: You're talking about a totally different tax base. If you've got 5,000 population, that's a lot different tax base than when you've got 3,000 population.

Strege: In some cases.

Gunderson: In some cases, yes, but in some cases, no.

Strege: Tax base has some correlation with population, but it's not a true correlation all the time. The more people you have, the more tax base...I mean, that's not true all the time. But Nora, what I want to know is, where would you make these divisions? What makes sense to you?

Verpoorten: I would go 3,500 to 5,000, five to seven, and then about seven to eleven.

Strege: That's recorded, and we'll consider that.

[pause]

Verpoorten: I'm still getting back to the local autonomy issue. I just...I...I...I just don't see how you can tell a local library board who is responsive to its constituency and...legally responsible.

Strege: I think my answer to that, Nora, is that we're only making rules for the disbursement of state aid. The Commission is saying, if you want state aid, you...this is what your library should look like, with these minimal standards. If a library determines that they don't want to meet standards, nothing happens to the local funding. The Commission can only control state aid. It's not getting into decision making power. You still have the power, or you did, once you were a trustee, of making that decision where you spend your money.

Verpoorten: Yeah, I understand that. I still think its...it's okay.

Strege: Actually, I see your point, too.

Verpoorten: I'll listen for a while, while somebody else talks.

Strege: Amendments? Corrections? Debbie.

Schlesinger: More comments?

Strege: Sure.

Schlesinger: I just have a comment on section five, the appeals process. And I realize this is taken from other appeals process, but my main point is that some consideration be given not just to appeal on process, but appeal on interpretation. Right now, the only way you can appeal something is if the process wasn't followed, but because these standards are open to...I would submit, some kind of different interpretations, there ought to be some credence given to a difference in interpretation or a difference of opinion as to interpretation, and that's not reflected in the administrative rules.

Strege: Do you have a model?

Schlesinger: Model? Hell no.

Strege: Oh.

Schlesinger: But I'll think of something.

Strege: Follow up to Debbie, which of the rules, and I think I know what you're going to say, but I want you to say, which of the rules is given to interpretation?

[pause]

Schlesinger: Which?

Strege: Which...which one of the rules is given...is open to interpretation?

Schlesinger: I think that...I have plans submitted for the amelioration of the standards, might lend itself to be interpreted in different ways. Could be rejected on the basis of one interpretation versus another interpretation, and I don't have anything firmly in mind, but I do know that having been the victim of one of these appeal processes, that there's no room for interpretation; it's strictly process. I think that when you're talking about withholding money, and to some libraries, substantial amounts of money represented in their budgets that I think there has to be some flexibility in terms of how we interpret how they're going to meet these standards.

Verpoorten: And if a library cannot meet the standards within the three years, no matter what kind of a plan they have, if they go through the three years, is there room for another variance?

Strege: I'm sorry. Could you say that again?

Verpoorten: I said, if a library cannot meet those standards within the three years, is there room for another variance?

Schlesinger: Not according to these administrative rules.

Strege: I'm thinking again, Nora.

[pause]

Strege: It's not clear to me. I think it needs to be made clear in these rules. I agree with Debbie.

Schlesinger: You think there's room for it?

Strege: I don't know. I think it's ambiguous, and the rules cannot be ambiguous.

Verpoorten: We can't see that it's in there.

Strege: Okay.

Verpoorten: And another...and...and this does not apply to my library but I am concerned with other libraries. If you say that a library has to hire somebody with an MLS, you're again saying, this is how you spend your budget. Most libraries can't afford to hire somebody with an MLS. If you posted a job opening that says you have to have an MLS, you have to be able to pay for an MLS.

Strege: That's why the standard is written to affect only the libraries of 25,000 or more, that have the tax base to support a library with funds enough to employ an MLS.

Verpoorten: Well, but Montana wage standards are not that high. And it's awfully hard to attract a qualified MLS on the wages that any library in Montana is able to afford to pay. Look at how long they had to post the opening in Libby.

Strege: That's true. You're right, it is a problem for Montana libraries, but not striving to meet a standard, an important standard like an MLS would be wrong in my estimation.

Schlesinger: I just have one other comment from some members of my library board. While recognizing that standards are really important, standards without additional monies to libraries that are extremely strapped and have a very limited tax base, seem to them to be punitive and the amount of money that was available didn't seem -

from the state aid - didn't seem to make up the difference between what they would have to do to reach some of these standards now. Right now, that's not a problem for my library, but if we lose an emergency mill levy, it will certainly be a problem. I will have to go down to a very minimal number of hours and then not only will I not have any money in my budget, I will also not have any state aid in my budget, so it seemed to be a double whammy...

Verpoorten: It is a double whammy. That's what it is.

Schlesinger: ...and they did point out that in other states, in many other states that have standards, there is some help given to libraries to meet these standards. Monetary standards, monetary help and that perhaps we ought to be looking in the next legislative session at monies to help libraries to help meet this.

Strege: As you well know, Debbie, we're working on that at the Law Revision Task Force. We're looking at changing state aid, or not changing it so much as adding on to state aid some programs. We're researching an equalization formula. That means that any library who is up to its maximum levy but that can not reach a certain standard, of local revenue per capita, would be able to get more state aid. Ok, the poor, really, the poor libraries that have met their obligations under the law are at the maximum would be able to receive a state stipend to bring them up to the average. We're also looking at funds, incentive funds, for libraries to consolidate or to hire an MLS with a state stipend to alleviate the cost of the salary that you pointed out. So there is study going on about these state aid issues. It is a problem, I know that, and whether we're ready for next legislative session, which is my hope, or whether we delay until 2003, I can't tell you right now, because changes...we won't just make these changes in Helena and go to...you know, we have to go to MLA. We have to go to all the federation meetings. We have to get your buy-in into it. And whether we have time, I don't know. But be assured that we are studying those issues. They are a very big concern for me. Our state aid is very low, compared to other states.

Williamson: I'm Bonnie Williamson and I represent the Havre-Hill County Library and the Pathfinder Federation, and there was a commission member at the standards meeting we had, along with Karen and other state staff when we met at the Pathfinder Federation. And the only concern that was raised there, and it never changed, was the three years. They wanted that higher; they wanted longer to be able to comply, and other than that, I support standards because I think

if we don't have something to reach for, we're going to continue to stay and not struggle for more money.

Verpoorten: I agree with that. I mean, I am not against standards. I'm...I'm... have a problem with the way these were set in the administration.

[inaudible: too many people speaking simultaneously]

Verpoorten: I agree that standards are good, because you need...you have to have a goal, and you have to have something to take to your taxpayers.

Williamson: And so, I know the effort was very thorough at trying to get input from the communities and federations, from the Commission and the State Library staff, but I think they just wanted, because standards are new to us, and we've always kind of shunned them, that they probably wanted longer to be able to comply, although I think....

Verpoorten: I think we just ignored them.

Williamson: We sorta did.

Strege: Bonnie, may I ask you a question? Is it the certification standard that you're talking about here, or the whole set?

Williamson: The certification standard.

Strege: Okay.

Williamson: The certification...because it's five years, and then the certification is ...or did you change that? I haven't looked at the new one.

Gunderson: May I speak?

Strege: Diane Gunderson.

Gunderson: I'm Diane Gunderson from the Montana State Library. The certification program has been totally revamped, and so now there is an enrollment period for the librarians, the directors, the staff members, trustees, for when they're first time applicants, they can apply for this enrollment. That means they are enrolled. Once they receive their enrollment letter they are enrolled into the certification program. That means that they are in it. That means they're going to be certified, but they do sign a certification intent form that says within the next three years, I agree to obtain 40 hours of continuing

education and to achieve this level and they'll state a level that they want to do, and that will help all the library directors in the state to become certified right away, because they will be enrolled in the certification program. When their deadline comes at the end of their enrollment period, they will receive a letter from me stating that their certification application should be presented to me with the 40 hours within at the end of the three-year enrollment period.

Williamson: Well, I haven't read the new certification manual. It just came and I haven't looked over it. I should have known that Diane would be on top of that, but that was one thing, the five years here and three years there.

Strege: It was very confusing.

Williamson: It was confusing, and so I didn't think about that until I heard your concern, but that was a concern in our federation.

Gunderson: So that will help the...now it won't help those librarians that were grandfathered in, in '92 and '93. They need to do the certification application because they're not first time applicants. They've already been in the program. So, but this will help all the librarians that have never been in the program. But we know that it can be done because we did have a librarian who started working on her certification and within 8 months, she received her 40 hours and was certified.

Williamson: It's fairly easy.

Verpoorten: There was 40 hours of CE in 8 months?

Gunderson: She got it.

Strege: Probably going to MLA.

Verpoorten: Well, MLA, of course there's a lot, but...

Gunderson: She's from Darby.

Verpoorten: She did it?

Gunderson: She got it. Within 8 months, she got her certification.

Verpoorten: She's one little go-getter.

Gunderson: Yeah.

Strege: For the record, I'd like to point out, too, that I did receive an Email from Gloria Langstaff from one of her trustees, which gives suggestions for clarification. There's no real substantive thing here but I wanted to tell you that I did receive something from Gloria, too. Any other comments? Proponents?

[pause]

Strege: What we do now is, we'll transcribe the hearing record. Any comment that was made will have to be responded to by me in writing, so you'll receive something formally from the State Library regarding that.

I'll modify the hearing record for the Commission, probably just with the comments on them, not...you know, the stuff that I read at first and all that. And they'll get a meeting record, too. A little amended, but it'll be the substance, and especially the things that you brought up, Nora. We'll make any recommendations to the Commission for changes by October 1 to go out in their mailing, that they get before the commission mailing, and at that time, too, we'll make sure that each of you here at the hearing get that memo in the mail, too. So you know what recommendations we'll be making to the Commission at their meeting, and those will be staff recommendations.

If we don't change anything to your liking, you still have the following avenues to make the changes to happen. You could come to the commission meeting; unfortunately, it's in Billings, so it's a little farther away from Plains and Polson, but you could certainly write them an individual letter. If you want to send that through me, I would be happy to make the distribution to them, or that you could also contact them directly at their addresses that are in the directory. It also said that if the Commission doesn't take action on the rules as you would like them, then you could go to the Administrative Code Committee, and I read that before you came in, but I'd be happy to give you that information. So you have a number of avenues still left to you, even after this hearing today.

Hearing Closed.