

MEMO

To: 2023 Public Library Standards Task Force Members
From: Cara Orban, Consortia Director
Subject: Summary of public comment
Date: September 14, 2023

General comment:

1. Bruce Newell, former Montana State Library Commissioner: These standards were rebuilt very carefully. Everyone who was involved felt that they were being very responsive to facts and to needs of MT library users. As a member of the Commission at that time, I was nervous but I saw how hard we had worked to build them. This process of reconsidering them should acknowledge that years-long process and give considerable weight to what is on the ground and not just dismiss it for unsubstantial reasons. Respect the former process and the existing standards because they do reflect the consensus of the library community at the time. (Public comment session, August 30, 2023)

Comments specific to Administrative Rules under review by the Task Force:

- [Define which state payments require compliance with public library standards](#)

1. Ruth Barefoot, Kalispell citizen: All state payments require compliance with public library standards as defined by the American Library Association. (Submitted electronically, August 19, 2023)

- [Amend 10.102.1158 \(1\) and 10.102.4003 to include accredited tribal college libraries](#)

1. Ruth Barefoot, Kalispell citizen: Tribal college libraries, when in compliance with standards set by the American Library Association for tribal communities, should be eligible for resource funding and support. (Submitted electronically, August 19, 2023)

- [Update formula under 10.102.4003 to account for accredited tribal college libraries and to account for the distribution of funds if no tribal college libraries apply](#)

1. Ruth Barefoot, Kalispell citizen: The fund should remain, Improve the promotion of the fund directly to potential recipients. Work on "tribal time" and there may be results. (Submitted electronically, August 19, 2023)

2. Pamela Benjamin, TRAILS Academic Library Consortium: I am writing in favor of the proposed amendment to administrative rule 10.102.4003 to include accredited tribal college libraries in the state aid to public libraries. Montana's tribal college

libraries serve two populations – that of their academic institution and the general community in which they are located. This unusual and demanding, dual role requires that these libraries have additional resources. I have visited the tribal colleges around the state and can testify to how stretched they are for money, time, and staff. They provide vital and unique services for populations that are often underserved. I strongly support enabling these libraries to qualify for additional state funding. (Submitted electronically, August 28, 2023)

3. Aaron LaFromboise, Director, Medicine Spring Library, Blackfeet Community College:

This is a complex issue. Reservations are sometimes established across multiple counties. Each tribal college library treats their charge to serve their communities very differently. The mandate to serve the college, the community, or the reservation at large varies by tribal library. Some may not provide public library services because of lack of capacity. Also, the relationships between the tribal libraries and their adjacent public libraries will vary.

Of the options presented here, school districts are probably the best representation based on who tribal libraries serve. There is not any option that is going to fit neatly for everyone. A uniform approach could generate resentment from some public libraries. Would it be ok to have different rules for different counties? (Public comment session, August 30, 2023)

4. Bruce Newell, former Montana State Library Commissioner: Balance between the county and tribal libraries fits into the anticipated way of making this work. There should be a process where all parties sit and talk this out. This could be a catalyst to increase efficiency and provide better services for counties generally and certainly the tribal members to live in and adjacent to the county. Every tribe has different expectations and hopes and so we probably cannot avoid having separate agreements. (Public comment session, August 30, 2023)

- [Consider amending 10.102.1158 \(7\) the library's budget shows year-to-year growth to better reflect the intent of the original public library standards' task force](#) -: the task force voted to recommend updating the standard to this language: *The library board and director identify the financial resources needed to provide library services according to the library's mission and regularly communicate with community and local government leaders about financial needs.*

No public comment

- [Consider amending 10.102.1160 \(7\) – Library directors serving populations over 25,000 must have a Master of Library Science or equivalent degree](#)

Comments in favor of retaining the current requirements:

1. Elizabeth Jonkel, Missoula: I caution the Task Force against altering the requirement that a Library Director serving populations over 25,000 be exempt from having an MLIS or equivalency. The analogy I frequently use to underscore the importance of professional training and education in libraries is the work environment

in a drugstore pharmacy. Although a stock clerk or counter assistant may be able to direct a customer to a product line or ring up a prescription sale, no number of years of experience in this capacity is in any way a substitute for a trained pharmacist. You would only want a professional pharmacist to counsel you or make decisions regarding adverse drug reactions, prescription usage, medication ingestion, or medication side effects.

A Library Director should be a trained professional with the appropriate educational training and background to manage and oversee the complex operational and executive-level components of library management. Just as you would expect a pharmacist, engineer, architect, or physician to be in place to manage personnel and functional conditions of their organization, so too should you expect a trained information and library management professional to oversee a public library. It is my personal opinion that altering public library standards to remove the MLIS requirement would do a grave disservice to the people of Montana and the staff who are employed in Montana public libraries and would undermine the legitimacy of the library professionalism in the state. (Submitted electronically, August 17, 2023)

2. Ruth Barefoot, Kalispell citizen: No change on this rule. Library Directors serving this sizable community MUST have a MLIS Degree. (Submitted electronically, August 19, 2023)

3. Julie Edwards, Board of Trustees, Missoula Public Library: A professional degree, by definition, is a degree that prepares someone to work in a specific field by meeting academic, licensure, or accreditation standards. The MLIS is the professional degree in librarianship, and is in the company of professional degrees in fields such as law, medicine, pharmacy, and business - to name but a few. The education they confer focuses on both practical applications as well as theory and philosophy.

The MLIS provides a foundation in philosophy and ethics including equity in service and access, intellectual freedom, intellectual property, and the right to privacy - as well as how these build upon and intersect with bedrock Constitutional values in this country, particularly those of the First Amendment, which protects the rights of both creators and consumers of information.

Libraries are fundamentally about providing people the tools and services to read and learn freely, without restrictions. They are houses of public learning, and in the spirit of learning it is imperative that librarians know not only what professional values and responsibilities are - but why they matter. The purpose of the MLIS is to provide a strong foundation in these values.

These values find practical expression in codes of ethics. Librarianship is one of several professions - including law, medicine, psychology, and social work - with a code of ethics. In fact, the presence of a code of ethics is part of what makes a profession, a profession, rather than just a job. Removing the standard for the MLIS - the degree which provides the intellectual foundation of these ethics - is a step towards de-professionalizing librarianship.

Practically, I offer the following in responses to some of the questions being considered today: Because of the philosophical and ethical education provided by

the MLIS in particular, there is NOT an equivalent degree that is acceptable. Nor is work experience a substitute for the degree. It is NOT acceptable for directors to not have the MLIS if staff reporting to them have the MLIS. By way of comparison, would it be acceptable for a paralegal to supervise a lawyer?

I will close by asking the task force to consider this question - can you think of any other specific profession that requires a master's level professional degree and is governed by a code of ethics that would be able to be done by someone without that education? (Submitted electronically, August 22, 2023)

4. Lisa Mecklenberg Jackson, Board of Trustees, Missoula Public Library: I am in favor of maintaining the standard of requiring a professional degree for library directors. This is essential training and background for library directors. (Submitted electronically, August 22, 2023)

5. Audra Loyal, Board of Trustees, Missoula Public Library: I can't believe that the task force is even considering removing this requirement. It is essential that directors have a MLIS. Just like doctor's need degrees in medicine, lawyers need to pass the bar, even truck drivers need a CDL, library directors must have specific training in the nuances of librarianship. Please do not remove this requirement. (August 25, 2023)

6. Pamela Benjamin, TRAILS Academic Library Consortium: I strongly support the requirement of an MLS for library directors serving a community with a 25,000+ population. While it is true that some library knowledge and skills can be attained by those not acquiring a library degree, it is also true that there likely could be a lack of understanding of the key ideals and principles of librarianship, e.g., Ranganathan's Laws. Librarians are not just keepers of books, but rather information professionals. The larger the community served the greater the importance for these professionals to have the training and in-depth comprehension of the concepts and ideals so fundamental to our profession. To deny community members the benefit of this higher-level training is to do a great disservice to that community. As with any other profession, obtaining a library degree means a person has met not only the knowledge requirements of their field but also possesses a deeper understanding of the work and its associated duties and obligations. This makes that person better at their profession. Why would the State Library Commission wish to lower standards for Montana's communities? Keeping this requirement in the law shows that the MSL Commission acknowledges earning a library degree is of import – not just to the individual acquiring the degree, but also – and especially - to the people of the community that person serves. (Submitted electronically, August 28, 2023)

7. Jacqueline Frank, Bozeman: I strongly urge you to NOT change the standard. Please KEEP THE STANDARD of requiring an MLS for library directors. It is fundamental and necessary for a library director to have an MLS degree to understand the nuances of libraries, the services and resources they provide, and to be able to run their library in a way that serves their communities best. This level of professional education and competency ensures directors are able to balance and



execute their duties in an effective and efficient way that results in better financial performance, better community support and programing, and better use of state funding. (Submitted electronically, August 28, 2023)

8. Anne Kish, Montana Tech University, Montana Association of College and Research Libraries Chair:

My name is Anne Kish. Today I'm entering comment as the chair of Montana's chapter of the Association of College and Research Libraries, known as the ACRL. The Montana ACRL Comment is in regard to the statute requiring public library directors serving populations of over 25,000, to have a Master of Library Science or equivalent degree. The ACRL supports the requirement as it stands and opposes any erosion to the current professional qualifications required of public library directors for the good of the profession in general.

Academic librarians are responsible for educating many of Montana's library professionals and paraprofessionals. The State of Montana doesn't offer an in-person MLIS, but we do offer online academic programs that result in teacher-librarian endorsements and that prepare other students for work in public libraries. Academic librarians are responsible for placing those students in observations, internships, and practicum experiences with qualified public librarians. As we often see, public librarians, teacher-librarians, and academic librarians all rely on one another for knowledge sharing, mentorship, and support. Fostering the profession is one tenant of librarianship that we all value. Library directors can't foster the profession if they don't have the educational background.

Having professional library directors who are qualified for their positions as defined by an advanced degree in library or related field is important to the communities in which they serve. It's also important to the health of the statewide library community that these qualified library leaders are able to serve as mentors to future librarians and public library employees.

Thank you for considering my comments today. (Public comment session, September 13, 2023)

Comment to consider other degrees:

1. Starla Rice, Director, Hot Springs Public Library: If they don't have an MLS degree, they should have a degree in business administration or the like. They are handling a large staff and a large budget. (Submitted electronically, August 17, 2023)

- [Amend administrative rule 10.102.1162 to better define what is NOT a hardship and to clarify the process for requesting a deferral](#)

1. Ruth Barefoot, Kalispell citizen: The rule 10.102.1162 is clear. Further clarification will open the process for further miscommunication and abuse. (Submitted electronically, August 19, 2023)