



MEMO

To: Montana State Library Commission
From: Jennie Stapp, State Librarian
Subject: Amendments to Administrative Rule 10.102.1160 pertaining to the Montana State Library continuing education and certification program public comments
Date: November 10, 2025

The Montana State Library received the following written public comments regarding proposed amendments to Administrative Rule 10.102.1160 pertaining to the Montana State Library continuing education and certification program.

Proponent comments

None received

Opponent comments and requests for clarification

To: Montana State Library Commission From: Sagebrush Federation of Libraries Public
Comment RE: 10.102.1160 Continuing Education and Certification

The Sagebrush Federation of Libraries respectfully submits this testimony regarding the Commission's proposed changes to the Public Library Standards and the above-referenced ARM rule, specifically the changes to the Montana State Library Continuing Education and Certification Program. The document to which we are responding is linked [here](#).

We urge the Commission to consider the multifaceted role of librarianship, individual libraries' and staff needs and wants, and local control. Areas of concern are:

Criteria for approval of continuing education: We would like to see a guiding policy, matrix, or some sort of rubric that standardizes approval of submitted opportunities.

Local control: Our library needs in far eastern Montana are often different from those in areas of greater population. We are concerned about losing the ability to hear from a variety of presenters that provide opportunities that are of value to not only the job of librarian, but to our unique staff, building, and community needs. Losing autonomy about our continuing education is our biggest misgiving about this change.

Time barriers: We are concerned that the 20 hours of initial certification in one year may be too much for a new director. Again, our smaller libraries often have different needs. The director may staff the library themselves with only a volunteer as support staff, and as the director position has a steep learning curve, a new director could quickly become vulnerable to burnout



with this timed requirement. While we see value in a standard curriculum for those in the first year of their career, we suggest revising the timeline.

Library concepts: Library trustees, staff, and directors recognize that library fundamentals are more than cataloging or understanding the basics of collection management. To name a few, CPR/First Aid, customer service, conflict resolution, working with diverse populations, and emergency response, are all, at minimum, entry-level essentials. We would appreciate the consideration that these trainings have great value in the library and are, in fact, a core element of librarianship, and ask for inclusion of these topics in a pre-approved catalog.

Montana Library Association: We are concerned education opportunities available at the annual MLA conference may be at risk. This is an annual opportunity that includes the incentive of continuing education credit. By supporting continuing education obtained at our professional conference, the Commission recognizes the value of these opportunities and the learning and networking they afford librarians.

Currently certified directors, staff, and trustees: Will there be a “grandfather clause?” Many libraries have trustees, directors, and staff who have attended the majority of courses offered by Montana State Library staff (e.g. MSL Learn and live/recorded webinars). Our time is valuable, and we wish to attend new professional development opportunities that honor the time MSL staff has already dedicated to producing professional development.

Presenters: We believe it’s important for the Commission to understand that while training for its own sake has value, it’s the opportunity to earn credit and ultimately certification that drives engagement and results. There are many reputable opportunities from other organizations such as WebJunction and other states’ libraries, and we are concerned that the availability to attend for-credit webinars, conferences, and other opportunities that best meet our needs will be gone or limited due to the time and energy MSL staff must take to work with the subject matter expert and develop a description and learning objectives. Many of these courses have descriptions and learning objectives stated in registration materials and at the beginning of the class, and we suggest the Commission consider these opportunities with a simple recommendation from MSL staff.

Learning is at the core of libraries and librarianship. We value lifelong learning and we are encouraged by the Commission’s desire to create a strong initial and continued education pathway for trustees, directors, and staff. We are grateful for the opportunity to provide comment on this proposed change as we are committed to professional development that meets our, and by extension, our communities’ unique and evolving needs.

Thank you,

Sagebrush Federation of Libraries

Ekalaka Public Library



Fallon County Library

Garfield County Library

George McCome Memorial County Library

Glendive Public Library

Henry A. Malley Memorial Library

Miles City Public Library

Prairie County Library

Sidney-Richland County Library

Wibaux Public Library

The Pathfinder Federation respectfully submits this testimony regarding the Commission's proposed changes to the Public Library Standards regarding the changes to the Montana State Library Certification program.

Ongoing education is essential to having an informed and effective workforce. We support the goal of the certification program "to ensure library directors have the foundational skills necessary to manage a public library that meets standards set forth in ARM Title 10, chapter 102, subchapter 11, Public Library Development." We support the goal of tightening educational requirements to ensure that they align with Commission goals and are relevant to excellent library service.

We urge the Commission to build in flexibility that respects the needs of Library staff and the importance of local control.

Points we would like you to consider.

- Library Directors are on the frontline of serving our communities and have the best understanding of what they need to best serve their community. Foundational concepts are constantly evolving. Please include a mechanism in the approval process that allows for Librarians to advocate and gain approval of a specific needed training.
- A major component of many libraries training is attendance at the Montana Library Association Conference and Federation meetings. The timeline of annual Commission approval of training for credit calls into question how MLA workshops and Federation trainings will be pre-approved when the trainings and workshop schedules aren't set on a timeline to be approved annually.
- Local control is a core value of Montanans. Currently local Boards approve what training is needed to best serve their unique community needs. A large library

provides different services than a small library. A library on the Hi-line has different needs than a community more focused on tourism.

- Core Library Concepts are not enough to have effective staff. Managers need to be trained and supported in leadership and supervision. Staff need CPR, First Aid, Active Shooter and other safety training. Customer Service and budgeting are core business skills that are also relevant to libraries.
- Trustees will require training outside of foundational Library concepts—such as Robert's Rules, Board dynamics, best practices, community relations, civic engagement, fund raising, etc.
- Trainings from other reputable agencies such as the Wyoming State Library or Webjunction, serve an important function in training Montana's Libraries. We would like to understand how the Commission will review these other excellent training resources. The need for pre-approval will greatly limit the range of training opportunities for Montana Librarians. It will also strain the ability of Montana State Library staff to provide all necessary training.

Belt Public Library- Gladys Rayhill

Blaine County Library- Valerie Frank, Patty Hall

Choteau/Teton Library- Crystal McLoughlin, Karen Ferris, Marji Corey, Roger Hadley

Chouteau County Library- Emily Wicks, Jessalyn Ritland

Conrad Public Library- Tiffany Christensen, Lida Holst

Dutton/Teton Library- Cheri Fuhringer, Jean Harman

Fairfield/Teton Library- Tracie Roeder, Carol Idland

Glacier County Library- Austin Castle, Becky Kimmet

Great Falls Public Library- Susie McIntyre, Sam Deforest

Harlem Public Library- Carly Vauthier, Teresa Cornell

Havre-Hill County Library- Rachel Rawn

Liberty County Library- Julie Erickson, Belinda Hawks

Medicine Spring College Library- Aaron Lafromboise

Stone Child College Library- Joy Bridwell

Toole County Library- Heidi Alford, Adele Benjamin, Emily McDermott

Valier Public Library- Cathy Brandvold, Chris Grotbo



Wedsworth Memorial Library-Nancy Royan, Heather Milburn

Thank you Ms. Gersdorf for collecting comments on Continuing Education MAR Notice.

Thank you to the MSL Commission for your dedication to Montana libraries.

10.102.1160 (c) reads, "Continuing education credits issued through the State Library certification program are the only eligible credits that can be applied to certification."

There are trainings needed by other government agencies or vendors that are necessary to manage a district public library. With limited time to complete trainings, I would request that those necessary training also count towards certification. Examples of such training are Black Mountain Government Accounting Software, Montana Public Employee Retirement (MPERA), and Montana Department of Administration, United States Census Data Training, etc.

I have worked in libraries for over 30 years and have an MLS. There are many excellent trainings offered by the State Library, however, for ongoing certification, there have been years when it is a challenge to find the correct number of useful courses. It is a waste of time to take a course and learn nothing new just for the credit. It is useful being able to determine what courses I need to accomplish my job. I appreciate the help in finding courses but warn against the above limitation. Additionally, (b) says the course of study and topics would be reviewed annually by the commission which would mean they were not up to date. To make sure the course of study and topics are up to date, reviews would need to be more frequent, monthly would be ideal but quarterly would be adequate.

Thank you,

Denise E. Ard, Library Director

North Valley Public Library

208 Main St.,

Stevensville, MT 59870

(406) 777-5061

denisea@northvalleylibrary.org

Pathfinder Federation

The Pathfinder Federation has some thoughts and worries about the proposed changes to library hours and the certification process.

Certification Questions & Concerns

- Different libraries and librarians have different needs. What works for one community might not fit another. How do we account for that?
- Does the Montana State Library (MSL) have enough courses to create a full certification track?
- What is the plan moving forward?
- What kinds of courses will be offered?
- Who's creating the content (like videos)?
- Does staff have the time to make this happen?
- Which courses will count toward certification?
- Will courses from the MLA conference count toward certification? Librarians really want these to be applicable.
- Who is in charge of approving courses? The commission? MSL staff? How will that process work?
- What happens if there's a disagreement on what gets approved?
- How will courses be approved a year in advance?
- What about last-minute courses?
- Can there be a process for approving those in the spur of the moment for pop up course?
- Suggestion: Give the Continuing Education (CE) person, like Colet, the authority to approve credits or courses quickly (say, within a week or so). After all, she's the hired CE expert.

Course Suggestions from Librarians

- Federation Trainings (with local control in mind).
- Leadership courses for librarians managing big teams.
- Courses by Dan Clark & Ashley Kent
- Communication classes to help librarians handle interactions and speak effectively.
- Practical training like CPR/first aid and active shooter preparedness.
- Author-related programs or workshops.
- Professional groups, e.g. PNLA-Pacific Northern Library Association, The Association for Rural and Small Libraries.

Local Control & Funding Issues

Libraries are wondering about local control- how much say will they have? They've been told they can take courses, but if those aren't preapproved, they won't count for credit. The bigger issue is that local funding might not cover courses unless they're approved, which could limit access to training.

Let's keep the conversation going to make sure this works for everyone!



Jennifer Ball, Library Director
Stillwater County Library
27 N 4th St, PO Box 266
Columbus, MT 59019
jball@stillwatercountylibrary.org

October 27, 2025

To: Montana State Library Commission
Delivered via email vgersdorf@mt.gov

Subject: Objection to Proposed Changes to Continuing Education in the Public Library Standards

Dear Commissioners,

I am writing to express my strong concern regarding the proposed changes to the continuing education requirements in the Public Library Standards. While I understand and appreciate efforts to streamline professional development, the proposed revisions raise serious concerns that, in my view, would lower professional standards, limit educational opportunities for library trustees and staff and ultimately devalue the critical work of library professionals.

Specifically, the key proposed changes raise the following concerns:

1. **Elimination of Multiple Tracks** Reducing the professional development pathways to a single track risks lowering the bar for library directors, staff, and trustees. The current system allows for differentiated paths that reflect varying responsibilities and expertise levels. By collapsing these into one, the standards fail to recognize the diverse skills needed to lead, manage, and operate public libraries effectively.
2. **Rigid Course Catalog and Pre-Approved Opportunities** Restricting continuing education credits to a pre-approved catalog limits the ability of librarians, staff, and trustees to pursue educational opportunities that are relevant to their communities and evolving library practices. Professional development should encourage innovation and adaptation, not constrain learning to a pre-determined set of offerings.
3. **Simplified Credit Requirements** The renewal track's removal of specific credit requirements in each area of responsibility diminishes accountability and reduces the incentive for directors to maintain a well-rounded knowledge base in all facets of library leadership. This could result in gaps in critical competencies essential for running effective, responsive libraries.

4. **Devaluation of Library Staff** Continuing education has been vital for library staff, most of whom do not have formal backgrounds in librarianship. Stillwater County Library is one of the few libraries in the state that requires all staff—not just the director—to be certified. We have found that this requirement has helped staff grow as professionals, increased their confidence and expertise, and expanded the range of services and programs offered to our patrons. Reducing CE requirements or limiting opportunities would undermine these benefits and send a message that staff development and the growth of library services and programs is not a priority.

Impact on Patrons Well-trained staff directly benefit our patrons and make the best use of the local tax revenue allocated to us. Certification and continuing education have allowed our library team to introduce new programs, expand technology services, and provide higher-quality reference assistance. Patrons experience more knowledgeable, responsive, and engaging services as a result. Any reduction in staff training opportunities risks diminishing these vital community services and the overall quality of library experiences.

Libraries are dynamic institutions that rely on highly trained, competent staff to meet community needs. The proposed changes, while perhaps intended to simplify processes, appear to reduce professional rigor and limit opportunities for growth, which could have long-term negative effects on library services across the state. Local government often views libraries as an unnecessary service and a waste of local revenue, a view that would be upheld by the Montana State Library Commission making this detrimental cut to the Public Library Standards.

I urge the Commission to reconsider these proposed changes and maintain standards that:

- Support differentiated professional development tracks;
- Encourage a broad range of educational opportunities for librarians, staff, and trustees;
- Preserve rigorous competency requirements for directors; and
- Uphold the value of library professionals and their contributions to their communities.

Thank you for your consideration of these concerns. I hope the Commission will prioritize maintaining high standards that reflect the importance of libraries and the dedication of their staff.

Sincerely,

Jennifer Ball
Stillwater County Library Director

Regrettably, I am not able to join the virtual hearing on November 3rd, but am instead submitting the following comments on the proposed changes to 10.101.1160 Personnel.



I have had the privilege to serve as a trustee of the Stillwater County Library for many of the past 20 years. During this time, I have seen the library grow in staffing, programs and outreach while meeting many challenges. The library is an integral part of the community providing valuable services throughout our rural county. I am very concerned that some of the proposed changes will diminish our high level of service.

First, I question the wisdom or desirability of reducing the number of open hours requiring paid staff to be on duty. Why not keep it at 100%? I do not think the public will be well served by this change. I doubt very much if volunteers can comply with ensuring the kinds of access listed in 10.102.1159 Serving the Community, numbers 3 through 12.

Secondly, I strongly object to doing away with the certification of staff. We value this certification so highly that it is written into our job descriptions for all staff. Over the years, this certification has been very useful in training staff and is not onerous. I don't think any of our staff over the past two decades have had any difficulties in completing this certification. Staff need the training and the library benefits.

Thirdly, I strongly object to restricting continuing education credits to the State Library certification program. This will prevent libraries from using all possible training opportunities that they may need. While MSL staff have been excellent in developing courses, they are limited in number and time and cannot possibly address all needs. The current practice of having courses outside MSL approved has worked well. Our director has taken courses from reputable organizations such as Niche Academy, WebJunction, and the Wyoming and Maine state libraries. Restricting the use of these resources will not improve her ability to find the information and training she needs to serve our community.

These proposed changes do not improve library services; instead, by loosening standards and restricting access to needed training resources, they are a disservice to Montana citizens. The proposed changes are not needed, have no real impact on budgets, and should not be implemented.

I urge the Commission to revise the proposed changes accordingly.

Thank you for your consideration of my comments.

Kathleen Ralph

Trustee

Stillwater County Library

Please accept the following comments on the proposed changes to 10.101.1160 Personnel.

I have three primary objections to the proposed changes:



1. I am against reducing the number of open hours requiring paid staff to be on duty. Montana public libraries are here to serve Montana citizens. Qualified staff are necessary to comply with ensuring the kinds of access listed in 10.102.1159 Serving the Community, numbers 3 through 12.

2. I strongly object to doing away with the certification of staff. We value this certification so highly that it is written into our job descriptions for all staff. Over the years, this certification has been very useful in training staff and makes our library better for the training. Staff need the training, is not difficult for staff to comply and the library benefits.

3. I strongly object to restricting continuing education credits to the State Library certification program. These programs will prevent libraries from using all possible training opportunities that they may need. While MSL staff have been excellent in developing courses, they are limited in number and time and cannot possibly address all needs. The current practice of having courses outside MSL approved has worked well. Our director has taken courses from reputable organizations such as Niche Academy, WebJunction, and the Wyoming and Maine state libraries. Restricting the use of these resources will not improve her ability to find the information and training she needs to serve our community.

These proposed changes do not improve library services but are a disservice to Montana citizens. The proposed changes are not needed, have no real impact on budgets, and should not be implemented.

Thank you.

Joan Brownell

Chair

Stillwater County Library Board of Trustees

I don't have a problem with the State Library people providing training. It is the fact that we will not be allowed access to any other training. This in itself is a form of censorship or lack of freedom to access outside sources.

I have learned a vast vat of knowledge by listening to other libraries from other states.

Do not tie our hands (brain) or restrict our training to what the Library Commission "thinks" we need to perform our job when they are not in the every day trenches to actually "know" what knowledge we need.

One doesn't just read one author when looking for knowledge about a subject. We read multiple authors to obtain a wider perspective to allow us the better knowledge to perform our job.

We have to be allowed to explore resources that fit our job.



Limiting or censoring our knowledge to authors/A, B, C, D is censoring our abilities/knowledge. We can not be well rounded in training to perform our jobs to the best of our abilities if we are not allowed to pursue multiple lines of training.

Nancy Royan, Director of Wedsworth Public Library

October 15, 2025

To the Montana State Library Commission:

Two years ago you rescinded the administrative rule that held library directors of our state's larger libraries to a higher educational and professional standard. The stated reason for this change was that it was "the commission's opinion that local boards should be given responsibility to set library director qualifications as the size of the community may require a different skillset or knowledge base for the library director."

With the proposed changes to continuing education and certification, it appears that the commission's belief in local control and the appreciation of each community's distinctive needs are no longer factors for our public libraries. Accepting only continuing education credits that have been preapproved by the Commission at a state level drastically hinders a library from investing time and resources into a training that could better address a specific or unique community issue. The proposal also suggests that any training worthwhile to the certification program must be applicable to at least 25% of public libraries in the state, further undermining the importance of a local library board's knowledge of its own community needs.

The Montana State Library has a team of highly respected professionals who have the ability to assist local boards and directors in identifying legitimate training opportunities that are applicable to actual needs. This proposed change does not "simplify the certification program" but rather complicates the path to continuing education that is imperative to providing excellent library services to Montanans.

Thank you for your consideration.

Sincerely,

Tiffany Christensen
Conrad, MT

Meeting minutes summary at 00:26:02 on the November 3, 2025 MSL Commission Public hearing on the changes to the Continuing Education ARM:



Expressed concern that the rule centralizes control over acceptable courses, reducing local autonomy and flexibility.

Andrew Albers
Vice Chair of the Miles City Public Library Board of Trustees

Meeting minutes summary at 00:27:35 on the November 3, 2025 MSL Commission Public hearing on the changes to the Continuing Education ARM:

Opposed limiting certification credits to those issued by the State Library. Emphasized the need for staff and trustee training and criticized the cumbersome process for adding new courses.

Mary Drew Powers
Director of Whitefish Community Library

Meeting minutes summary at 00:31:22 on the November 3, 2025 MSL Commission Public hearing on the changes to the Continuing Education ARM:

Opposed eliminating the librarian certification track, stating that different roles require distinct skill sets.

Jacque Scott
Resident of Sweet Grass County
Retired Librarian and Library Director

I attended the State Library Commission meeting on June 13, 2025. I have concerns about some of the actions they are contemplating. As I understand it, you are on the committee for Continuing Education.

It is my understanding that the Commission wants more control over Continuing Education. They want to implement a system requiring pre-approval of topics and providers; possibly provide evidence of classes taken; restrict providers; and there was discussion about possible testing.

There was some discussion about only Montana State Library personnel teaching education? They were suggesting having a foundational list of coursework for boards, directors and staff that is pre-approved.

It appeared that there would possibly be testing and more requirements to hire new Directors.



I admit I don't know what others are turning in for CE. I worry about the pre-approval and their foundational list of coursework. I look for education that is pertinent to my job. Some of that is outside of what I see on the list of programs listed on the CE site.

If I have to have pre-approval of my CE, it will hamper the job that I do. It will have a negative effect on my job skills, and the CE that I obtain. Sometimes I find a course that I feel will enhance my ability to perform my job and the course is going to take place the same day or within the next day or two. I will miss out on some valuable training if I have to obtain pre-approval.

Someone might say just make a list of providers you will probably take training from. I don't always know what providers are going to turn up.

I can email a state library personal, but if that person is not available at the appropriate time because of vacation, traveling, their own schedules, etc. I will miss out.

The Commissioners don't appear to deal in reality. How do they know what I need to perform my job? What I often find is that courses taught by the State Library or some of the providers many appear to rely on, don't fit the education I need to perform my job.

Are they going to pre-approve all the MLA training at MLA? I often don't know what courses I will be taking until I walk into the room. Will some of these classes be useless in our CE certification? Will I be doomed to take classes approved by the State Library Commission just to obtain certification even though they are not in line with what I need to perform my job?

I can almost guarantee that if we have to take tests to show we attended a training, it will be extremely difficult to obtain certification. I have enough to do without worrying about testing. Then again, I don't even have the hours to take a test.

I also understood they might require testing for becoming a Director? If that is so, it will be difficult to find people willing to test out in small communities such as mine. Even communities such as Glasgow etc. might find it difficult to find appropriate personnel. Many would not apply if they have to take tests.

They still don't get the obstacles they are setting up for trustees. I have a very difficult time getting applicants and convincing trustees to stay for their term. Add more requirements for them, will have a negative effect.

I have to admit I was startled to see the Commission was surprised that Libraries thought Customer Service was important for training. Maybe I misunderstood that statement.

I realize no actions have taken place. They were just suggesting ideas. I just don't find many, if any will be beneficial to the library world or at least to my world.

Nancy Royan



Director of Wedsworth Public Library

To whom it may concern:

I write to you regarding the amendments being considered at MSL for Continuing Education. I have an issue with (6)(b) and (6)(c) under ARM 10.102.1160. I currently sit on the Trustee Board for the Glasgow City County Library in Glasgow, Montana, serving my fourth of a five year term. I'm proud to say that not only has our Library Director, Megan Haddix, met her past needed CE credits, she is currently working towards the credits what will come due in 2027. Even moreso, I am delighted to be able to state that one of GCCL's full-time staff members, Janet Eidson, has also recently met her CE Certification. This is solely her own choosing, not a requirement as it is for Library Directors.

Glasgow City-County Library's director (and hopefully staff member(s)) will continue to strive for excellence regarding CE Certification, but the changes in eligible credits will make this much harder for completion. Not being able to go outside the approved MSL courses will limit what is available, especially considering the rural location of our library for in-person options. Another issue is the timing if one is seeking approval of a possible course is not already approved by MSL. Being that many courses are announced within a month or less of their date being held, it will not be possible to get approval beforehand from the MSL Commission when they only meet quarterly. For example, myself along with GCCL's Library Director and another fellow trustee were able to attend a wonderful Human Resources Training Workshop in a neighboring small town. We only heard about this opportunity three weeks before the workshop's date. It was a wonderful day of learning, but could potentially have been a waste of time for our director as she may not have received any credit as the MSL Commission wouldn't have met in that three week timespan to determine CE eligibility ahead of time.

As an active community member, and major supporter of our local library and lifelong learning, I foresee many complications with the approval of the proposed amendments and am not in support of them.

Thank you for your time.

Amy Fast

Glasgow City-County Library Trustee

Greetings Ms. Gersdorf,

I'm submitting feedback on the proposed changes by the MSL Commission to the Continuing Education and Open Hours requirements for our public libraries.

I have served as Vice President of the Glacier County Library Board for the past four years and was a staff member within our library system for two years prior to my current tenure. I'm also



an active community member with two young sons. This combined experience has allowed me to have the perspective of the staff, administration and community when weighing in on the MSL's proposed changes.

I'm deeply concerned that diminishing the required open hours for libraries in our state undercuts the vital role that libraries play in our communities. As a rural county with low socioeconomic status, our libraries not only provide free knowledge and resources but act as a refuge, community incubator and source of joy that are so vital to the wellbeing of our service area. Often, we are the only institution in our area capable of fulfilling these important roles in our community. We regularly hear from our patrons that they would like extended hours and days of service but we are already facing the reality of a severely restricted budget. Please don't incentivize further impacts to our funding by changing our required hours of service.

I would like to echo the sentiment expressed by the Pathfinder Federation in regard to the proposed changes to the Continuing Education requirements. I urge the Commission to build in flexibility that respects the needs of Library staff and considers the importance of local control. We are a vast and varied state and this is not a situation where a uniform approach across the state will best service our unique communities.

Thank you for your time and consideration.

Sincerely,

Claire Stone

Babb, MT

TO: Montana State Library Commission

FROM: Angela M. Claver, NLCPLD Cataloguer

RE: Proposed Library Certification changes

First, please let me say thank you for your service to the whole Montana library community. I've observed and interacted with you at MLA sessions and find you all to be thoughtful, hard working and committed.

I've been involved in the Montana Library community on some level since 1988. My library path began in Parmly Billings Library. In the years 1994-2008 I became a professionally certified music educator and taught in both public/parochial schools. I heard of the Montana Library Certification program when I returned to the library environment at Great Falls Public Library in 2008.



At first I did not see the value of this certification as it wasn't tied to a pay schedule. I was thinking like a teacher and that was wrong of me. Coming to North Lake County Public Library in Polson, Montana where I am now this Library's cataloguer, I was encouraged to become certified. The MSL certification process is an enrichment and provides lifelong learning that enables library employees to provide excellent service.

A portion of cataloguing training was available on WebJunction. I've taken ADA training through the American Library Association (ALA) Libraries Transforming Communities (LTC) grant program. In 2019 I earned several credits while attending PNLA (Pacific Northwest Library Association) in Spokane, Wa. MSU-Extension provided Dementia Friendly library Service training. The Polson Police Department provided CPR & AED training plus active shooter trainings to Polson Library Staff.

Were you to pre-approve a slate of courses acceptable for Continuing Education (CE) credits, NONE of the foregoing would be available. Such limitation will cause library employees to lose interest and ability to certify when they are not able to have a full slate of choices pertinent and helpful to each situation. AND while the enhancement is removed, a heavy burden will be created on Montana State Library staff.

Thank you for the opportunity to comment publicly. Please take these remarks into consideration while making your decision. I hope you will reconsider proposed changes to the State Library Certification program.

To: Montana State Library Commission
From: West Yellowstone Public Library Board of Trustees
Date: Friday, October 31, 2025

Dear Montana State Library Commission,

The West Yellowstone Public Library Board of Trustees greatly appreciates the Commission's support for library staff development. However, we respectfully oppose the proposed policy requiring prior approval for continuing education classes used toward State Library certification.

Continuing education credits are already submitted to the Montana State Library, whose staff are knowledgeable and dedicated library professionals with extensive experience supporting libraries across the state. While we understand the goal of ensuring quality, this change could limit local flexibility and slow access to timely, practical training.

Supports Local Decision-Making: Trustees and staff are best positioned to choose educational opportunities that directly meet their community's needs. Requiring Commission approval could create delays or restrictions, making it harder for staff to pursue training when it's most relevant. Libraries differ widely in size, resources, and patrons' needs—what works well for one may not suit another. Centralized approval risks imposing standards that may not fit local



realities. We also note that the Commission recognized the importance of local decision-making when it removed the library master's requirement for directors in 2023.

One of the first things new staff at our library are instructed to do is begin working on their Montana State Library certification. It's an excellent introduction to library service and a great way for new employees to learn, grow, and gain a strong understanding of library work and statewide resources.

Our library has found the current certification process to be extremely effective. It provides structure while allowing flexibility, and it helps ensure that professional development remains responsive to real community needs. Staff and directors have distinct but complementary skill sets, and the current certification process does an excellent job supporting both. Selecting our own CE opportunities allows staff to build skills in ways that are both challenging and motivating. It encourages initiative, fosters growth, and keeps learning directly connected to the patrons and programs we serve every day.

Thank you for your time, your thoughtful guidance, and the continued support of Montana libraries.

Sincerely,
West Yellowstone Public Library Board of Trustees
Mike Bryers
Alma Clark
Magen Crowley
Sarah Heames
Paulina Salinas

The Philipsburg Area Community Library board of trustees and employees are not in favor of the AR 10.102.1160 changes. We appreciate what the Montana State Library offers, however having the option to acquire credits from other states and institutions allows a broader scope of learning.

Thank you for considering our comments. Please vote no for this change.

Gina Vale, Library Director
Sue Sweeney, Board Chair

TO: MSL Commissioners
FROM: Barbara Hvizdak, Lincoln County Libraries trustee



DATE: 6 Nov 2025

RE: Admin. Rule 10.102.1160 Continuing Education

I would urge the Montana State Library Commission to reject any proposal that limits professional development for library employees. Employees benefit from a wide array of training opportunities, opportunities that should be as diverse as the communities they serve. Training should not be a 'one-size-fits-all' approach because each library, like the community it serves, has different needs and interests. Continuing education needs to remain fluid and flexible, providing *more* opportunities and not less!

Library employees should be encouraged to seek a wide variety of training and education to broaden their skills and knowledge. Such a variety will enhance their ability to better serve their patrons and community. It is critical for the MSL Commission to support their efforts to meet continuing education requirements by expanding, not restricting, their opportunities.

Barbara Hvizdak, LCL trustee

3908 Sophie Lake Rd.

Eureka, MT 59917

Dear Montana State Library Commissioners,

I am writing you today to provide public comment on the proposed changes to the Montana State Library certification and continuing education programs. In March 2026 I will celebrate 10 years with the North Lake County Public Library District and in January 2026 I will celebrate 8 years as its director. In that time I have achieved certification three times and am onto my fourth utilizing a variety of incredibly valuable trainings that I have received from a variety of sources. Many of my credits have come from trainings provided by the Montana State Library staff, and while I value and respect their knowledge and expertise, I have also received many important trainings from others at the Pacific Northwest Library Association (PNLA) conferences, the Association of Rural and Small Libraries (ARSL) conference, the Public Library Association conferences and most recently the American Library Association conference in Philadelphia.

As the coordinator for the Tamarack Federation, I have had the privilege of presenting to all of you on the Commission and have had the opportunity to talk with some of you over the past few years at MLA conferences or social events tied to the October Commission meeting. I have great respect for you and the duties you are directed to uphold by law. I have listened carefully as you have discussed many topics, including the proposed changes to the continuing education program. I do understand your concerns about the relevance of some of the credits that have been claimed. I believe that credits for certification must fit within the areas of study outlined in the certification process. Courses on personal growth and wellness, while important, do not usually fit within those areas of study. I've given this a lot of thought and a possible solution may be to set rules for the content of the courses rather than limiting who the



presenters are. This way, classes like an active shooter training – which would fall under services to the public, could be provided by our local police department and still count toward certification.

I know of the Commission's concerns regarding the ALA. I attended the annual ALA conference in Philadelphia this past summer. I didn't agree, nor was I interested in everything that was offered, but I found great value in the sessions that I did choose. These sessions were taught either by peers in the library profession or by professionals in their own field. I learned about tools to help reach our rural communities from the folks at ARSL, I learned methods for how to better manage my staff, I took a fascinating session on how images can manipulate us which was taught by a high school teacher – AI is coming fast and furious and it is our duty as librarians to help our patrons decipher the real from the fake. The two most important sessions I took were technology related. I learned about new tech trends that can be implemented to streamline my tasks and those that can be used to better support our patrons. This was a panel session with six experts in their field sharing information. The session on how to make our website and online presence ADA compliant to follow new federal laws was incredibly helpful. I wasn't even aware of what this all entailed before I attended the session, but I walked away with tools and a checklist of what has to be done by the deadline.

This is just one example of one large conference. I have learned so much from all of the conferences I have attended. I'm not great with webinars. I think they have value, but I have a hard time giving them my full attention while I have a million things on my desk that need to be completed. I prefer attending in person trainings where I can give my full attention and avoid the distractions of the library. This is where I learn best. I am concerned that if the only credits that will count for my certification must come from the state library, and if there are not more in person opportunities, that I will struggle to be able to get enough credits for certification. I am concerned that the librarians in our state will lose out, because it will be harder to justify spending money on attending conferences where they not only gain valuable education but also have the opportunity to meet in person with vendors and learn about new products, if they cannot count that as credit toward certification.

Please reconsider putting the limitations on this program and the burden on the State Library staff. I believe there is a way to accomplish what you want with ensuring credits are legitimate and valid while still allowing librarians and trustees to learn from a variety of sources.

Respectfully,

Abbi Dooley, Director

North Lake County Public Library District

102 1st Street East

Polson, MT 59860



Continuing Education MAR Public Comment

Submitted by: Sarah Widger, Department of Public Services Head, Bozeman Public Library

Chair Scribner and Commissioners: Please accept my written public comment regarding the proposed changes to the Personnel Section of the Administrative Rules of Montana: 10.102.1160.

As the supervisor of 12 employees at the Bozeman Public Library, I rely on the existing continuing education tracking system and learning tracks to help keep my employees' learning recorded and on track. My employees and I regularly evaluate what courses, classes, webinars, and trainings would help them grow in their career, whether they are on their way to an MLIS degree or otherwise. The changes to the tracking system to only have one learning track for library directors would make the entire system untenable and no longer useful for my staff. Not all of them want to become library directors, and even if they did, it would not benefit them to take the required classes as currently outlined at this stage in their careers. Their learning and their careers are not less important because of their entry-level position. It would be more helpful to leave the tracking system as is, with multiple options for engagement, so the decision on what courses or trainings are assigned to an employee is up to the employee's supervisor and not dictated at the state level.

Part of my ongoing discussions with staff is helping them determine what trainings they would benefit from, sometimes on a month-to-month basis. If section 6-b and section 6-c were to be approved, most of the classes my staff take would not be eligible for continuing education credit due to the rolling nature of decision making in the library. Sometimes courses are not known about until the day, week, or month before the training, sometimes those courses are pre-recorded and archived by the offering organization already, and courses may be offered by groups that are completely unrelated to libraries. As an example: one of my employees is the adult volunteer coordinator. While there are some trainings out there related to this position's work, they are not necessarily provided by the State Library or by an organization that the State Library has pre-approved for continuing education.

If the goal of the changes made to this section of the Administrative Rules is to outline more requirements for Library Directors to meet and maintain the Public Library Standards, that is one thing. But to make these changes and take away options for non-library directors takes away local control of supervisors, directors, and boards of trustees on what is best for their employees.

I'm grateful to the Commission for caring about the continuing education of library directors across the state. I hope that care and consideration is also given to non-library directors, and that the Commission can extend trust to library leadership across the state and know that they will continue to make the best decisions they can for every staff member under their supervision.

Item 6c, Does that mean that college courses in library studies no longer can be used for certification since they are not offered by the State Library? I got my initial certification by using college classes.

Gladys, Rayhill, Library Director

Belt Public Library

Greetings to the Montana State Library Commission Members!

Let me first start by saying, "Thank you." I'd like to give sincere thanks for the time, work & effort that you have put in, not only for this task, but I am sure in other areas as well.

However, I also want to express my sincerest appreciation for engaging in discussions and taking the time to connect with Directors when we seek additional information or clarification on proposed changes.

I would like to submit some thoughts for consideration as you move forward in this complex process.

Regarding:

10.102.1160 PERSONNEL, Section 6, Sub-Section c):

Continuing education credits issued through the State Library certification program are the only eligible credits that can be applied to certification.

I would like to humbly & respectfully request that the Montana State Library Commission members also accept trainings (CE's) that are offered through MACo or MMIA.

I would respectfully request that you allow continuing education credits from either MACo or MMIA, as their trainings are focused on staff safety, facility safety & customer engagement. All of these areas are important to our field. These trainings have ranged in topics from 'De-Escalating Patrons/Customers' to 'What to Do in an Active Shooter Situation.' As a small rural library, having access to these free trainings also greatly helps to stretch our limited budget.

Please, also consider allowing CE's from other State Libraries. There are some wonderful webinars from other State Libraries that have tremendous professional value. One archived webinar discussed how a public library was using audio equipment to record local tribal elders, the physical history of the area through interviews, & also the cultural history of the tribe. The webinar covered how to catalog audio files, the technology used, & the cultural significance of the new 'e-library'. It was very awe-inspiring to think of how these ideas could be utilized to preserve local history & tie that into our 'Montana History Portal'.



Please, also continue to use the Montana State Library YouTube channel for uploading recordings of trainings.

While I have not heard of any discussion or plans to discontinue this resource, I want to stress how much of a benefit this is for Directors, Trustees & library staff. It can be incredibly difficult to attend a live 'Zoom' or in-person training off-site. Having these recordings uploaded in a way that we can view them as scheduling permits is greatly appreciated.

Regarding the tracks for CE's, the entire staff of our library is requesting consideration of making a 30-credit or 25-credit track for library staff who are only part-time.

My staff have expressed to me that being expected to complete a 60-credit CE track, in subject matters that they will never use in their current job position (such as setting library policy or creating a library budget), is wasteful of their time.

For staff who may only be in the library less than 18 hours per week, the time they are here for programming or special projects is precious. The training that is requested of them should pertain to either their current expected job duties or training for a recent promotion or position change. Regardless, the CE's should pertain to their actual job duties or functions.

Thank you for the opportunity to share these comments & thoughts.

With gratitude & appreciation,

Crystal Buchanan

Thompson Falls Public Library

Hi,

I have been at the Glasgow City-County Library for 20 years, and have just been certified for the third time.

I always get as many credits as I can from the state library before I go places like WebJunction and the Maine certification program.

I have always found it stressful to get all the credits I need. There are always an abundance of Library Services to the Public credits and Administrative credits available. It is harder to find Collection Management and Technology credits, which is where my specialty lies.

Also, I have wanted to take several classes after the fact, but was told you had to take these classes live. There was no mention of this in the description, so I missed them. I prefer to take recorded classes. They fit into my schedule better, and as an introvert I don't miss the class interaction.



I enjoy the certification program and have learned a lot. I am concerned that you are trying to make it more difficult, when it is already difficult enough. Having my director and my board oversee my credits should be enough.

Staff needs certification as well as directors. Things change and it is important to stay informed.

Thanks for listening,

Janet Eidson

Glasgow Library staff

I respectfully submit this statement regarding the Commission's proposed changes to the Public Library Standards regarding the changes to the Montana State Library Certification program.

Ongoing education is essential to having an informed and effective workforce. I support the goal of the certification program "to ensure library directors have the foundational skills necessary to manage a public library that meets standards set forth in ARM Title 10, Chapter 102, subchapter 11, Public Library Development." I also support the goal of tightening educational requirements to ensure they align with Commission goals and the needs of my service area and are relevant to excellent library service.

I urge the Commission to build in flexibility that also respects the needs of Library staff and Library trustees while maintaining the importance of local control.

Points for consideration:

- Library Directors are on the frontline of serving our communities and have the best understanding of what is needed to serve their communities. With constantly evolving foundational concepts, please include a mechanism in the approval process that allows for Librarians to advocate and gain approval of a specific needing training.
- A major component of many libraries' training is attendance at the Montana Library Association Conference and Federation meetings. The timeline of annual Commission approval of trainings for credit calls into question how MLA workshops and Federation trainings will be pre-approved when the trainings and workshop schedules aren't set on a timeline to be approved annually.
- Local control is a core value of Montanans. Currently local Boards approve what training is needed to best serve their unique community needs. Larger, urban libraries may provide different services and have differing needs than a more rural library system.



- Core Library Concepts are not enough to have effective staff. Staff need CPR, First Aid, and other safety training. Customer Service and budgeting are core business skills that are also relevant to library settings.
- Trustees will require training outside of foundation Library concepts-such as Robert's Rules, Board dynamics, best practices, community relations, civic engagement, and fundraising.
- Trainings from other reputable agencies such as the Wyoming State Library or Webjunction serve as important resources for training Montana Library staff. The need for pre-approval will greatly limit the range of training opportunities for Montana Librarians and could strain the Montana State Library staff who would then need to provide all necessary training. An in-depth explanation of the pre-approval process and timeline is needed.

Respectfully,

Austin Castle

Glacier County Library Director

November 11, 2025

Dear members of the State Library Commission,

Thank you for taking the time to hear comments regarding changes to the continuing education certification program for Montana public librarians.

Continuing education is an essential part of maintaining the skills necessary for managing a public library. I fully support the goal of making continuing education credits relevant and appropriate in meeting those skills.

It would be most appreciated if you would take the following into consideration during your discussions.

- Accumulating CE credits is a time-intensive process. While it appears the Commission has ideas for a set of core skills/topics, please consider the number of credits to be required. It should be noted that directors also need training in safety, personnel/human resources, programming, marketing and outreach, and collection development. Perhaps the Commission would consider fewer core CE credits, thus allowing directors and their boards the flexibility to determine other educational avenues specific to their libraries and communities.
- Besides the Montana State Library, please share the learning platforms or resources that have been discussed as potential training options. Some vendors offer free resources,



but other training options require a fee for courses, webinars, or in-person training. This could potentially be a hardship for some libraries.

- Please also share the criteria that will be used and experts to be consulted in deciding which avenues for training are deemed appropriate.

Thank you for your consideration.

Respectfully,

Jonna Underwood
Director
Sheridan County Library
100 W. Laurel Ave
Plentywood, MT

After attending several of the State Library Commission's meeting and hearing that the Commission has stated that they welcome public comments; I would like to offer some comments on some of the proposed actions and comments made during meetings.

The Commission might not understand the need for many libraries to have easy and reliable access to legal help. Our Library doesn't have easy access to an attorney. The County attorney here is too busy to talk to us and generally ignores us. The Town's attorney can't be accessed by anyone other than the Town Council. (Town's law) So we can't access the legal help the State Commission feels is readily available. So, a little consultation with Kris Goss about Law is beneficial and valuable.

Our library has no money for legal assistance. Maybe the bigger libraries do with their foundations. Where do we turn to when the legal issue is library against Town Council/Board or County? We have a very small budget with no financial help from a Foundation or Friends. We are not alone in the Library world with this challenge.

The mandates the State Library Commission is proposing for Continuing Education cannot keep up with the current up-to-date needs for libraries. The training that libraries have access to through other resources and MLA is just as relevant as the restrictive proposed CE training by the Commission.

I believe I have a better understand of my educational needs to perform my job than the members of the State Library Commission. I have found valuable knowledge attending training through PNLA and MLA training sessions. What is pertinent for a Director of Bozeman is not pertinent for me as a one-person library.

In the Commission's mind (if I understand the comments), we will still be allowed to access other training at our cost. However, it will be hard to validate this extra expense in a budget (even though this education maybe more appropriate for my position) if it does not count toward



CE credits. My budget is pretty small. I do not see any advantage to the proposed change. It is a loss of freedom on library personnel. The proposed restrictive CE training is equivalent to telling people they can only read Authors A, B, C, and D.

I cannot agree with the statement made at the last State Library Commission meeting: "That Library Boards are inbred groups". I question the Commission's concept of Library reality. Our Library has to beg people and practically drag someone off the street to join us when we have a vacancy.

It would be beneficial to all Libraries across the state of Montana if the Commission would pause a moment or two and consider the Library world through the eyes of the people who face the daily challenges of a Library. Consider our thoughts on what we feel we need, as we have a very vested interest in all changes of our world.

Nancy Royan

Director

Wedsworth Memorial Library

Box 526

Cascade, MT 59421

(406)-468-2848

I attended the latest State Library Commission meeting. The direction, directives and proposals by the Commission raises serious concerns for the future of libraries in Montana and whether some of us will survive.

Continuing Education is a big concern. I do not think the Commission has the appropriate current knowledge about what I (or other Directors) need to perform my job to best serve my patrons.

For instance:

I recently attended the PNLA Conference online. There I discovered a contact for an organization that is looking to help provide low-cost Hot Spots to Montana libraries. Their cost is extremely low.

The State Library Commissions does not see the need for Hot Spots or has the willingness to help libraries across the state that deem them necessary for themselves or their patrons.

I also attended a session that discussed AI. We talked about how to differentiate reality and AI and various aspects of AI. This is a hot topic currently and will be an ongoing issue. It is a



crucial aspect of what we do and the services we provide to our patrons. I do not see the Commission helping to fill in this need.

The State Library Commission was very big at their latest session about disassociating with any political issues. In fact, it became apparent that anyone who disagreed with their viewpoint, would be essentially chastised.

At the PNLA conference we discussed problems libraries might have with meeting room controversies/policies associated with political issues. How did libraries handle a meeting room OR a parking lot if someone held an event in the parking lot associated with something deemed political and then the opposing viewpoint wanted to use the library meeting room? I learned a lot and realized the difficulty for libraries if the parking lot was accessible to library patrons and thought of as the library parking lot, but actually owned by someone else. These types of issues create problems.

This very pertinent issue/training is very important to what libraries need to know to perform their services to the public. These great sessions plus others that I learned a lot from, will not be allowed under the extremely restrictive new rules for Continuing Education.

Most excellent training/learning comes from face to face; whether online or at a conference. The online U-tube videos proposed by the Commission are blasé. Without interactions for our trainings, good usable knowledge will be difficult to be obtained from the videos.

What the State Library Commission feels is pertinent and relevant, libraries are not completely on board with. The mandates they are proposing cannot keep up with the current up-to-date needs for libraries. The training that libraries have access to through other resources and MLA is far more relevant than what is proposed by the Commission.

All that has been apparent lately are rules, rules, rules and if you don't like it – tough. The Commission just doesn't listen. They have no concept of library reality and the needs of libraries. The Commission asks for public comment, but they hear and don't listen. They do not appear to care what we have to say, especially if it is in disagreement with their viewpoint.

With all the changes the Commission is discussing in several different aspects, I am worried our little library won't survive. I will be expressing this concern to my Library Board. Our community depends heavily on our library in so many different ways.

To say Library Boards are inbred groups proves the Commission has no concept of Library reality. Our Library has to beg people and practically drag someone off the street to join us when we have a vacancy.

It is getting harder to meet the Commission's demands. They aren't helping libraries. The Commission is just making demands and showing an unfriendly face to the library world and the public. They are making it difficult for libraries to function while simultaneously trying to satisfy



the Commission's demands and the difficulties we handle every day and still maintaining a smile upon our face.

I was appalled at the treatment of Montana Library Association. It is as if the Commission was retaliating against MLA for the past conference that created some hard feeling/rift between the two entities. (And those words came from someone else.)

MLA is important to the libraries across the state. It is a vital entity to library workers. I don't always agree with everything the Board does, but we are family and support each other. We can talk to someone who understands our lives and troubles, sympathize, and can sometimes help provide solutions.

We do not have any of that from the Commission.

It almost appears like the State Library Commission is blackmailing MLA. If you don't do what we want, we won't recognize you or anything you do. You must follow everything we say, you (libraries across the state) cannot have your own viewpoints.

The Commission is putting up walls and appears to be trying to destroy the Library Community and the support gained from that community.

The Commission provides no support.

It appears the Commission doesn't want competition. They only want to control and don't care how their actions could effectively destroy or affect the library community. Their directive should be "Do No Harm".

I worry and I fear. We have no choice, but to fall under the Commission's thumb or lose our library.

The Commission is so out of the loop about the need for libraries to have easy and reliable access to legal help. We don't have easy access to an attorney. The County attorney here is too busy to talk to us. The Town's attorney can't be accessed by anyone other than the Town Council. (Town's law)

So, a little consultation with Kris about Law is beneficial and valuable. The Library world has begged for years for legal resources. The State Library Commission has refused to hear us. (As they appear to refuse to hear all our pleas for help).

So, when MLA takes action and initiative to provide help and access to some resource for legal help, they are disparaged.

Our library has no money for legal assistance. Maybe the bigger libraries do with their foundations. Where do we turn to when the legal issue is library against Town Council/Board or County????

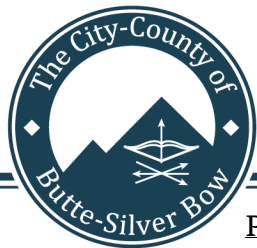


The Commission offers no resources or suggestions. This is the perfect instance of the Commission turning a blind eye and deaf ear to the state libraries' needs.

Are they trying to shut down all the Libraries in the state?

Nancy Royan

Director of Wedsworth Public Library



THE CITY-COUNTY OF Butte-Silver Bow

Butte-Silver Bow Public Library
Board of Trustees, J. Bushmaker, Chairperson
Ph: 406-792-1080 E-Mail: sjohnson@bsb.mt.gov

Public Comment on Proposed Administrative Rule Amendments

From the Butte-Silver Bow Public Library Board of Trustees –

November 6, 2025

Open Hours – 10.102.1159

The Butte-Silver Bow Public Library Board of Trustees respectfully opposes the proposed amendments to the Open Hours rule.

We recognize and appreciate the Commission's role in reviewing and recommending changes to administrative rules. However, we have not seen a clear rationale for this proposal—no library has requested these changes, and no budgetary savings have been cited to support them.

Over the past two years, we've worked hard to implement our Strategic Goals, focusing on improving our facility and staffing, enhancing our collections, and expanding community outreach and lifelong learning opportunities. These efforts have been made in close partnership with our local government, and we're proud to say that 44% of Butte-Silver Bow residents are library cardholders. Even more, we're able to provide these services at a cost of less than \$39 per resident.

If financial conditions become more challenging, the proposed minimum hours could put our progress at risk. We may be forced to reduce programs, lay off staff, or limit access—steps that would directly impact the safety, education, and well-being of our community.

We respectfully ask the Commission to reconsider these changes and maintain the current standards that allow libraries like ours to remain flexible, responsive, and sustainable.

Pg 1 of 2



THE CITY-COUNTY OF Butte-Silver Bow

Butte-Silver Bow Public Library
Board of Trustees, J. Bushmaker, Chairperson
Ph: 406-792-1080 E-Mail: sjohnson@bsb.mt.gov

Continuing Education and Certification Program – 10.102.1160

We also have concerns about proposed changes to the Continuing Education and Certification Program.

While we acknowledge the Commission's authority to review and recommend updates, we believe the current three-track system—for Directors, Trustees, and Staff—has been highly effective and should be preserved.

We believe that offering only one certification track diminishes the program's value, utility and versatility and overlooks the unique roles and responsibilities of each group.

Over the past two years, our Trustees have actively participated in state conferences, Federation meetings, and virtual learning sessions to become stronger advocates for our library. Our goal is full Trustee certification—one is already certified, and three more are nearly there. Our director is certified, and six staff members are currently working on certification.

Additionally, we feel the responsibility for reviewing and approving course content should remain with trained library professionals who understand the evolving needs of the field.

In 2025 alone, 78 Directors, Trustees, and staff across the state were certified. Those of us who have participated in the program have found it to be meaningful, practical, and empowering.

We sincerely hope the Commission will reconsider these proposed changes and continue to support the current structure, which has proven to be a valuable resource for Montana libraries.

Pg 2 of 2

Thank you for the opportunity to share our perspective. We look forward to continued collaboration in support of strong, vibrant libraries across the state.

Butte-Silver Bow Public Library Board of Trustees

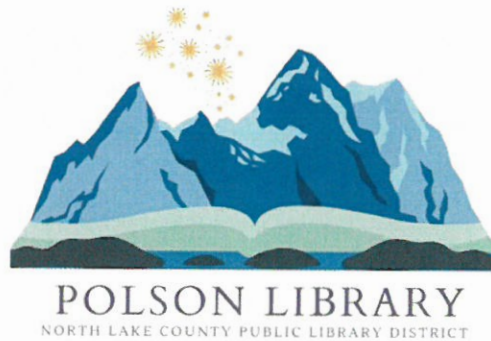
J. Bushmaker, Chairperson

E. Curry

M. Mansanti

M. Shea

K. Vang



October 31, 2025

Dear Montana State Library Commissioners,

The five Elected Trustees of the North Lake County Public Library District in Polson are jointly submitting the following public comments in regards to proposed changes to the Montana State Library Certification process.

We respect the Commission's authority and responsibility in creating rules regarding the certification of librarians in the State of Montana under MCA 22-1-103 (8) and we understand your concerns in regards to the current process. However, we are concerned with several of the proposed changes and how they may affect our director, librarians, and us as trustees.

The proposal to move to one track requiring 60 credits every five years for all staff and trustees limits the ability of trustees to achieve certification. We are elected to a four-year term. The majority of us work full-time jobs, have families, serve on other boards, and volunteer in other areas in our community. The current trustee track requiring 20 hours of credits is very achievable and encourages trustees to earn those credits by learning about library law and how to be an effective trustee through such methods as online webinars and federation trainings. Trustees do not need the same training that the library director or our librarians need. We entrust the daily operations of our library to these professionals. We need to know topics that are specific to us as trustees, and expecting us to spend, on average, 12 hours per year to achieve certification when the Public Library Standard is only three, suggests that certification is only suitable for those who do not have responsibilities outside of their role as a volunteer library trustee.

We agree that we want professionals working for our library and offering library services to our community. We encourage our librarians to achieve certification and reward them for that achievement. Of course, per Public Library Standards, our library director requires certification. What our library director needs to know to effectively run our library is different than what our librarians need to know to provide excellent service to our community members. Narrowing the course selection to focus on directors' needs limits the important courses that have inspired, encouraged and enlightened our librarians in the past. By limiting the offering of courses and not allowing librarians to obtain relevant education from reputable sources outside of the Montana State Library, you are restricting their abilities to grow in their profession. We understand that trustees may authorize trainings that do not count for certification credit, but the best use of taxpayer and donor dollars is to encourage trainings that do count. We are proud to have a strong

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polsonlibrary@northlakecountylibrary.org

relationship with our local police department, and have been able to offer such courses as CPR and AED training as well as active shooter training. Our staff members have participated in training with the fire department on the proper use of fire extinguishers. Ryan Dowd's trainings on de-escalation and how best to work with people going through a mental health crisis are invaluable. These are all important trainings when it comes to serving a vast and varied population. Our Library Director is the coordinator for the Tamarack Federation and is responsible for coordinating the training of trustees and directors from fifteen different libraries in Western Montana. Not all of these trainings are given by the Montana State Library staff. Each year she must contact speakers and arrange relevant sessions for the spring training. Based on the proposed rules, these trainings would no longer count toward continuing education credit, which would be disappointing for our trustees who are striving to achieve certification.

We understand that you have concerns with offerings from some of the state, regional and national organizations. Not every attendee is going to agree with speakers at every session. The beauty of our great nation is that we all have the freedom to think for ourselves. Just because some of the sessions are controversial does not mean that every session should be dismissed for counting toward certification credits. Our library director has attended a variety of conferences all over our country. She has returned with reports about such things as learning about revisions to patron policies and how to track incident reports, creating thorough disaster plans, and new national laws regarding ADA compliance of library websites. All of these topics are highly relevant to her adequately performing her job.

If the Montana State Library staff can offer all of these varied topics in ways and locations that are convenient to our staff, then that's great, but part of the joy of getting continuing education is learning from a large variety of educated, professional people. We all respect our State Library Staff and their knowledge, but unless you plan to hire many more of them to offer a wide array of training, we are concerned that our director, librarians and us as trustees will not get as complete an education as we could under the current system.

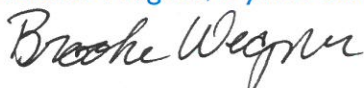
We would respectfully request that you reconsider changing the required number of credits for trustees and that you also reconsider limiting courses to only those taught or contracted by the Montana State Library.

Respectfully,


Allen Bone, 11 years served



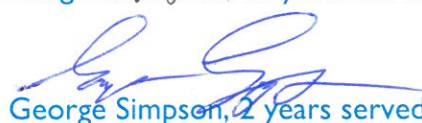
Brooke Wegner, 8 years served



Valerie Rogers, 2 years served



Maggie Auerman, 12 years served



George Simpson, 2 years served

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