

MEMO

To: Montana State Library Commission

From: Jennie Stapp, State Librarian

Subject: Amendments to Administrative Rule 10.102.1159 pertaining to the required open

hours standard

Date: November 10, 2025

The Montana State Library received the following written public comments regarding proposed amendments to Administrative Rule 10.102.1159 pertaining to the required open hours standard

Proponent comments

I support the change to the Minimum Hours in the Administrative Rules for libraries because of library's budgets and staffing. In addition, there is no point being open at times when people don't use the library. We reduced our evening and Saturday hours this past year because the patron traffic did not warrant being open after 6pm or being open every Saturday.

This change also helped enormously with staff coverage. We were having difficulty with coverage when someone was on vacation or sick. Consolidating hours allowed for more staff during open hours so that when someone was sick or on vacation, we were not in fear of closing and not burdening the other staff to come in extra hours on their days/times off to cover the absence. Although we are still above the current minimum, I can imagine there are other libraries that have staffing, and budget constraints that would appreciate this update.

Denise E. Ard, Library Director

North Valley Public Library

208 Main St.,

Stevensville, MT 59870

(406) 777-5061

denisea@northvalleylibrary.org

Opponent comments and requests for clarification

The Pathfinder Federation respectfully submits this testimony regarding the Commission's proposed changes to the Public Library Standards regarding the number of hours libraries are required to be open to the public. Libraries serve an essential function. We cannot serve our



communities if we are not open to them. We are concerned that the diminished requirement gives the message to local government that Library services are not important despite the community and the public's need. We believe this will adversely impact local funding and service.

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

Pathfinder Federation

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

Library Hours

There's concern that cutting hours might send the wrong message to local governments- like libraries aren't essential. We need to make sure this doesn't backfire and hurt library support.

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!



Kathleen Ralph, Trustee of the Stillwater County Library

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

Please include my comments to the MSL Commission (below):

Dear Members of the Montana State Library Commission,

Thank you for your support of our public, academic, school, and special libraries in Montana. I write to ask you not to lower the minimum number of hours that libraries in Montana are required to remain open. Our public libraries are essential community resources that provide



access to education, technology, and connection for people of all ages. Changing the wording to "on average" to allow for flexibility around certain close dates makes sense to me, and I would support only that change, but I am strongly opposed to reducing the minimums so far below the desirable number of hours.

I live in Missoula, where we are lucky to have an amazing, award-winning public library. But I have also lived in smaller communities, like Drummond, where the school and community library was also an important hub. I love taking my pre-school aged kids to our library for the amazing programing, books, storytime, and more. We also utilize online resources from the library. I am proud that my tax dollars support our libraries--a public good that serves so many individuals and families in so many ways. If the minimums were reduced to the numbers listed, it's possible that the library could be open fewer hours than most people work in a week. I know our community wouldn't let that happen, but I don't like the idea that it could, or that other, more rural areas, might be forced to make such tough choices.

It is well-known that reducing the minimum for just about anything will mean some areas reduce service or are incentivized to reduce hours to save money. Reducing the hours required to be open could only weaken these vital services, especially in rural areas where the library may be one of the few public gathering spaces. Our library commission should not support lowering the standards that ensure equitable access for all Montanans.

Thank you for your time and service to Montanans and our libraries,

Becky Dupre

Missoula, MT

To: Montana State Library Commission From: Sagebrush Federation of Libraries Public Comment RE: 10.102.1159

Serving the Community 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 change that reduces the minimum number of hours a library must be open. We share the Pathfinder Federation's concern that the "diminished requirement gives the message to local government that Library services are not important." We also share the belief that this has the potential to adversely affect local funding and service, and we fear that even the opportunity for reduced minimum hours will impact the trust our community has in us to meet their reading, listening, WiFi, and technology 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

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 understanding 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 of Wedsworth Memorial Library

Meeting minutes summary at 00:09:18 on the November 3, 2025 MSL Commission Public hearing on the changes to the Open Hours ARM:

Expressed concern that the proposed language is vague and may weaken libraries' ability to justify budgets and staffing levels. Suggested including rationale directly in the rule text.

Andrew Albers

Vice Chair of the Miles City Public Library Board of Trustees

Meeting minutes summary at 00:11:30 on the November 3, 2025, MSL Commission Public hearing on the changes to the Open Hours ARM:

Questioned the motivation behind the changes and whether libraries had requested them.

Jacque Scott

Resident of Sweet Grass County

Retired Librarian and Library Director

Meeting minutes summary at 00:13:47 on the November 3, 2025 MSL Commission Public hearing on the changes to the Open Hours ARM:

Echoed concerns raised by Albers and Scott, requesting clarification on the origin of the proposal.



Jonna Underwood

Director of Sheridan County Library

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

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.

Sincerely,

Claire Stone

Babb, MT

"It is a bad idea to shorten the hours a library is required to be open because that would reduce the availability of the library services to the public. Some of these smaller libraries are serving people that live a long distance away in their county and having the library open for less hours would make it even harder for some people to get to the library."

Thanks!

Christinia Stuart

Miles City Public Library Trustee

To whom it may concern:

I am writing to voice my opposition to the decrease in minimum hours that libraries are open weekly.

To decrease the hours that a library is open is to restrict citizens' access to:

- Resources for employment,
- Resources that support health and wellness,
- Resources for educational purposes,
- · Community programming,



- Books and other resources,
- Literacy programming,
- Human connection, and
- Information.

Please reconsider this reduction and allow citizens the access to information and services that they need to be productive in their communities. In this day and age, we should be encouraging more access to libraries, not less. We need educated citizens who are supported in all aspects of their life with information and access to that information.

--

Erin Fuller

Library Media Specialist

Sentinel High School

Chair Scribner and Commissioners,

Keeping libraries accessible requires keeping libraries open. Please do not amend ARM 10.102.1159.

Please respect by the hard- and long-won wisdom and overwhelming consensus of Montana's library community, and do not amend ARM 10.102.1159, SERVING THE COMMUNITY.

The open hours as they currently read represent a long-considered compromise between the ideal, lots and lots of open hours, and the real fiscal and logistic constraints libraries contend with while keeping their doors open.

If libraries are a public good, as they are, and if keeping libraries accessible to their users is key to maintaining and increasing that public good, this proposed reduction of the p[en hours required (in these ARM guidelines) will have the effect of undercutting many libraries local efforts to obtain adequate funding, cause libraries to degrade library services by reducing hours, and thereby make libraries less accessible. No one wants to degrade libraries role in their community as a public good, but reducing hours would do just that.

The current hours as per ARM 10.102.1159 represent years of compromise and experience. Please keep Montana libraries great. Please do not amend this administrative rule.

Thank you,



Bruce Newell

Bruce Newell bruce.newell@gmail.com 2570 Mayrowan Court Helena, Montana 59601

Victoria,

I write in reference to Public Library Standard 10.102.1159 SERVING THE COMMUNITY.

I believe the suggested reduction in the hours a public library is required to be open will result in less effective library service.

The current standard states, "Everyone ...has convenient access to the library and its services". Also, "Everyone has access to face-to-face programming".

A reduction in the number of hours a library is open will mean LESS access to the library and its services.

I urge the commissioners to keep the standard as it is currently written.

Thank you,

Jean Nielsen

TO: MSL Commissioners

FROM: Barbara Hvizdak, Lincoln County Libraries trustee

DATE: 6 Nov 2025

RE: Admin Rule 10.102.1159 Open Hours

According to MSL Commissioner Handbook, 'The role of the State Library Commission is '...to advocate for the State Library and the Montana library and information communities whenever possible.'

The Commission has proposed reducing the minimum open hours requirement by 30% for libraries across the state, regardless of the Service Area Population. I fail to see how reducing Service Hours assists the Commission in achieving one of it's core goals, as stated in 10.102.1159, 'To Serve The Community'.



I have served as a trustee for Lincoln County Libraries for the past nine years. I have worked with a number of county commissioners as that office changes hands but the repeating storyline is always balancing the county budget. In the current economic climate the library has been their preferred target for budget cuts since they view it as an 'extra' service. The library board and director face an annual struggle to simply maintain a working budget that doesn't even account for inflation. Reducing the Hours of Service simply supports the erroneous idea that libraries are an 'extra' service.

Lincoln County is composed of blue-collar, working class, rural and remote communities. The libraries serve as community hubs for the three largest towns and provide access to the internet with public computers, community resources, special programs for all ages, audio and physical book collections, and a knowledgeable and dedicated staff of professionals. The board continually receives patron requests for additional evening and Saturday access that we cannot meet with a limited budget and staff. Reducing the minimum Service Hours would require further reductions in staff, programs, and community services like Hi-Set, the weekly classes that help individuals earn a high school diploma.

Lincoln County Libraries is fortunate to have a dedicated staff and solid leadership, a staff that continually strives to provide the best service to their community. Lowering the expectation dilutes their efforts and sends the message that 'good enough' is good enough. The MSL Commission has an obligation to set high standards and hold member libraries accountable to those standards. I urge you to retain the current requirements for minimum open hours, as stated in 10.102.1159.

Barbara Hvizdak, Lincoln County Libraries trustee

3908 Sophie Lake Rd

Eureka, MT 59917

I respectfully submit this statement regarding the Commission's proposed changes to the Public Library Standards regarding the number of hours libraries are required to be open to the public. Libraries serve an essential function and cannot serve their communities if they are not open to them. I am concerned that the diminished requirement gives the message to local governments that Library services are not important despite the community and the public's need. I believe that this will adversely impact local funding and services.

Respectfully,

Austin Castle Glacier County Library Director

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 <u>Open Hours</u> 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 wellbeing 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.

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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 <u>Continuing Education and Certification Program</u>.

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.

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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

M. Shea

E. Curry

K. Vang

M. Mansanti