



## MEMO

**To:** Public Library Standards Task Force  
**From:** Jennie Stapp, State Librarian  
**Subject:** Public Comment  
**Date:** 8/21/23

Public comment received by 8/21/23 at noon:

- 1. Comment on defining which state payments require compliance with public library standards.**

All state payments require compliance with public library standards as defined by the American Library Association.

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**2. Comment on amending administrative rule 10.102.1158 (1) and 10.102.4003 to include accredited tribal college libraries.**

Tribal college libraries, when in compliance with standards set by the American Library Association for tribal communities, should be eligible for resource funding and support.

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- 3. Comment on updating the formula under administrative rule 10.102.4003 to account for accredited tribal college libraries and to account for the distribution of funds if no tribal college libraries apply.**

The fund should remain, Improve the promotion of the fund directly to potential recipients. Work on "tribal time" and there may be results.

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**4. Comment on amending administrative rule 10.102.1158 (7) that state that the library's budget shows year-to-year growth to better reflect the intent of the original public library standards' task force.**

I caution the Task Force against altering the requirement that a Library Director serving populations over 25,000 be exempt from having an MLIS or equivalency.

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

A Library Director should be a trained professional with the appropriate educational training and background to manage and oversee the complex operational and executive-level components of library management. Just as you would expect a pharmacist, engineer, architect, or physician to be in place to manage personnel and functional conditions of their organization, so too should you expect a trained information and library management professional to oversee a public library.

It is my personal opinion that altering public library standards to remove the MLIS requirement would do a grave disservice to the people of Montana and the staff who are employed in Montana public libraries and would undermine the legitimacy of the library professionalism in the state.

Elizabeth Jonkel, [ejonkel@hotmail.com](mailto:ejonkel@hotmail.com)  
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If they don't have an MLS degree, they should have a degree in business administration or the like. They are handling a large staff and a large budget.

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- 5. Comment in amending administrative rule 10.102.1160 (7) that states that Library directors serving populations over 25,000 must have a Master of Library Science or equivalent degree.**

No change on this rule.

Library Directors serving this sizable community MUST have a MLIS Degree.

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**6. Comment on amending administrative rule 10.102.1162 to better define what is NOT a hardship and to clarify the process for requesting a deferral.**

The rule 10.102.1162 is clear. Further clarification will open the process for further miscommunication and abuse.

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**7. Do you have additional comments that are consistent with the charge of the task force?**

Thank you for what you are doing!!  
Setting the tone for this process is critical in the years to come for Everyone in our Montana communities.

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