



MEMO

To: Montana State Library Commission
From: Jennie Stapp, State Librarian
Subject: Certification Rules public comments response
Date: December 3, 2025

During its November 12, 2025 work session, the State Library Commission considered public comments regarding proposed changes to Administrative Rule 10.102.1160 regarding public library director certification requirements. After considering public comments, at its December meeting the Commission will consider adopting the amended rules as proposed. This memo also includes a summary of the public comments received on the proposed certification rule changes and the Commission's proposed responses to include in the final adoption notice.

ARM 10.102.1160 Personnel

(6) The director is or will be certified by the Montana State Library within the required timeframe mandated by the certification program adopted by the Montana State Library Commission.

NEW The purpose of the certification program is to ensure library directors have the foundational skills necessary to manage a public library that meets standards set forth in ARM Subchapter 10.102.11 Public Library Development.

NEW A course of study and topics offered by the State Library will be reviewed by the Commission annually for approval at its final meeting of the state fiscal year.

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

NEW The certification program will be reviewed on a regular schedule with no more than 10 years between reviews.

Comments summary

Comment 1: Several commentors expressed concern that requiring the Commission to preapprove courses taken for credit would mean that librarians would miss out on valuable training that they learn about on short notice and may lose funding for training, if that training is not available for credit.

Response 1: The Commission acknowledges the importance of meeting as often as necessary to consider courses not included in the available course catalog. The Commission also noted



that because a course is not in the catalog does not prohibit someone from taking the course however they will not earn credit.

Comment 2: Numerous commentors noted that the rule changes centralize control for continuing education with the Commission and may eliminate local selection of continuing education providers and topics.

Response 2: Certification is one of the statutory duties of the Commission. It's the Commission's intent to provide more oversight over the certification program. MSL's continuing education and certification program will cover core library concepts. Enhanced training needs for local libraries will be addressed at the local library level.

Comment 3: Several comments asked whether courses taken at training, including the Montana Library Association Conference, would be approved for credit.

Response 3: The Commission stated that special considerations would be given to conferences. Conferences are very efficient ways to get continuing education credits and are beneficial to local government budgeting. The subcommittee will consider how the Commission should review program content and conferences.

Comment 4: Several commenters questioned whether courses offered from external resources would be considered for credit. Examples include college courses, MSU Extension training, webinars from the Pacific Northwest Library Association, the Association of Rural and Small Libraries, vendor training from OCLC, training at events like the Montana Association of Counties Conference and from the Montana Municipal Insurance Association, LinkedIn Learning, training from other state libraries, and local training like CRP and active shooter training.

Response 4: As proposed, courses offered for continuing education credit will primarily be offered by MSL staff, however it's the Commission's intent to allow courses from outside providers to be taken for credit as well after those courses have been approved by the Commission. The Commission commented that providers like MSU Extension offer excellent training. MSL staff do not have the expertise or capacity to offer sufficient courses for certification. If a course needs to be offered by someone with expertise beyond that of MSL staff, staff will recommend courses to the Commission. MSL will maintain a catalog of excellent classes. The Commission welcomes suggestions from libraries for additional courses for the catalog.

Comment 5: One commentor requested a guiding policy, matrix or rubric that sets criteria for the approval of continuing education courses.

Response 5: The Commission noted that the subcommittee is working to create a rubric that will be used to evaluate courses.



Comment 6: Several commenters noted the elimination of continuing education tracks for library trustees and staff. Commenters expressed concern that only offering a single track fails to recognize the diverse skills needed to lead, manage, and operate public libraries.

Response 6: According to Montana's public library standards, head librarians are required to be certified. The Commission encourages trustees and staff to be certified. To clarify this point, the Commission may consider using the language "certification track" rather than "Director's track" in the continuing education handbook.

Comment 7: Commenters noted that without a recertification track librarians have to repeat courses to earn credits for recertification which would be a waste of time and funding.

Response 7: Commissioners noted that there will be fewer approved courses in the beginning. Commissioners also noted that the new certification requirements require fewer hours of continuing education, and the course will be of higher quality. The course catalog needs to remain relevant and flexible for the future. For example, new courses may be added after each legislative session to educate librarians about legislative changes. Additionally, more innovative or elective courses will be left up to individual libraries to consider taking.

Comment 8: A couple of commentors expressed concern about a "one-sized-fits-all" approach to continuing education which may not address the unique needs of libraries that differ in size, resources and patrons' needs.

Response 8: Commissioners noted that the educational needs addressed in foundational courses offered by MSL do not change. Examples include courses on open meeting laws, complying with the Americans with Disabilities Act, budgeting, and building relationships with library trustees.

Comment 9: Currently college courses count towards certification. Recent graduates with a Master's in Library Science are eligible for certification for four years. Under revised rules, a commentor raised the question, would college credits still count for credit. Another questioned whether graduates would submit their transcripts to the Commission for review.

Response 9: The Commission noted that this is a question that needs to be further considered by the subcommittee. The subcommittee should consider how much course work should be specific to Montana while not requiring librarians to repeat basic coursework like cataloging.

Comment 10: One commentor questioned whether those currently working towards certification under the current rules would be grandfathered in.

Response 10: The Commission agreed that anyone who has started certification under the current model will be able to finish under the old system.

Comment 11: One commenter expressed concern about the lack of legal services available to local libraries.

Response 11: The comment regarding availability of legal services is beyond the scope of the proposed rule.

Proposed adoption timeline

Date(s)	Activity	Who	Status
July 2025	Continuing Education Subcommittee drafts initial recommendations	CE Subcommittee	Complete
August 6, 2025	Commission Meeting Materials Due	MSL Staff	Complete
August 13, 2025	Subcommittee Recommendations and Discussion Action Item to Initiate Rulemaking	CE Subcommittee and Commission	Complete
August 14-September 15, 2025	Notice of Proposed Rulemaking and Public Hearing prepared	MSL Staff	Complete
September 16, 2025	Notice of Public Hearing on Proposed Action filed with the Secretary of State's Office for Publication in MAR	MSL Staff	Complete
September 26, 2025	Notice of Rulemaking published in MAR	SOS	Complete
October 1, 2025	Commission Meeting Materials Due	MSL Staff	N/A
October 8, 2025	Second information item discussion (if needed)	CE Subcommittee and Commission	N/A
November 3, 2025	Conduct Public Hearing	Commission/Legal Counsel	Complete
November 12, 2025	Special Meeting to Prepare Response to Public Comment Adopt Responses to Public Comment	State Librarian/Commission/Legal Counsel	Complete
December 3, 2025	Commission Meeting Materials Due	MSL Staff	Complete
December 10, 2025	Action item to adopt new rule	Commission	Pending
December 11, 2025 - January 13, 2026	Notice of Adoption prepared	MSL Staff	Pending



January 13, 2026 (Tentative)*	Notice of Adoption filed with Secretary of State's Office for publication in MAR	MSL Staff	Pending
January 23, 2026 (Tentative)*	Notice of Adoption published in MAR	SOS	Pending
January-February 2026	New Certification Program Handbook Drafted	MSL Staff	Pending
February 2026	Draft Certification Program Handbook as discussion item	MSL Staff	Pending
April 2026	Adoption of Certification Program Handbook Adoption of Course of Study	Commission	Pending
July 1, 2026	Effective Date of Rules		Pending