



**MONTANA
ADMINISTRATIVE
REGISTER**



MONTANA STATE LIBRARY

NOTICE OF ADOPTION

MAR NOTICE NO. 2025-218.6

Summary

Adoption of ARM 10.102.1160 Personnel - Addition to Standard

Previous Notice(s) and Hearing Information

On September 26, 2025, the Montana State Library published MAR Notice No. 2025-218.1 pertaining to the public hearing on the proposed adoption of the above stated

rule in the 2025 Montana Administrative Register, Issue Number 18. A public hearing was held on November 3, 2025.

Final Rulemaking Action – Effective [effective_date]

AMEND AS PROPOSED

The agency has amended the following rules as proposed:

10.102.1160 PERSONNEL

Statement of Reasons

The agency has considered the comments and testimony received. A summary of the comments received, and the agency's responses are as follows:

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.

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Rule Reviewer

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Approval

Robyn Scribner

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State Library Commission