



MEMO

To: Montana State Library Commission
From: Carmen Cuthbertson, Commissioner
Kris Goss, Commissioner
Subject: Suggested revisions to 10.102.1159 (2)-(12) Administrative Rules of Montana
Serving the Community
Date: June 1, 2026

Commissioners Cuthbertson and Goss offer the following suggested revisions to 10.102.1159 (2)-(12) Administrative Rules of Montana *Serving the Community* for Commission discussion.

Once the Commission is satisfied with proposed draft revisions, at a subsequent meeting the Commission will take action to initiate rulemaking in accordance with the Montana Administrative Procedures Act.

I recommend that we re-word ARM 10.102.1159 to create objective, enforceable mandates to guide Montana libraries towards excellence in their services to the public.

- Express **what the library needs to do**. We are not tasked with mandating what patrons or the general public does/has/feels/thinks/believes.

- Use objective and well-defined terminology

Here are my suggestions.

- (1) The library is open during **generally** convenient hours. On average, the library is open the following number of hours weekly, as reported by the library in the annual public library survey:
- (2) ~~Everyone has safe, comfortable, and convenient access to the library and its services.~~ **The library complies with ADA requirements and provides safe access to its facilities, materials, and services. [move section (12) here:] Reasonable accommodations are made so that people with disabilities have access to the library's facilities, materials, and services.**
- (3) ~~Everyone has access to updated and regularly maintained physical and digital library content and services.~~ **The library regularly updates its physical and digital content and services.**
- (4) ~~Everyone can find library materials online.~~ **[move section (9) here:] The library maintains a website or social media site and provides online access to its catalog.**
- (5) ~~Everyone has access to virtual and face-to-face programming.~~ **The library provides virtual and face-to-face programming.**
- (6) ~~Everyone has access to information about local community and government activities that assists them with understanding local community issues and allows them to engage civically in the community.~~ **The library provides access to information about local community and government activities.**
- (7) ~~Children and caregivers have access to early literacy programming and materials either through the library or by being directed to another community organization that specializes in early literacy.~~ **The library provides access to early literacy programming and materials, either directly or indirectly by informing caregivers about community organizations that specialize in early literacy.**
- (8) ~~Everyone has access to information about library programs and services through internal and external marketing efforts of library staff.~~ **???**
- (9) ~~Everyone has access to a library website or social media site.~~ **[see (4) above]**
- (10) ~~Everyone can obtain materials and services from another library through interlibrary loan services.~~ **The library provides interlibrary loan services.**
- (11) ~~Everyone has access to the Internet via wired and WIFI connections.~~ **The library provides access to the internet.**
- (12) ~~Reasonable accommodations are made so that people with disabilities have access to the library's services.~~ **[see (2) above]**



10.102.1159 SERVING THE COMMUNITY

- (1) The library is open during convenient hours. On average, the library is open the following number of hours weekly, as reported by the library in the annual public library survey:

<u>Service Area Population</u>	<u>Minimum</u>	<u>Recommended</u>
Fewer than 3,500	10.5 hours	25-40 hours
3,501 – 9,999	21 hours	40-50 hours
10,000 – 24,999	28 hours	50-60 hours
More than 25,000	35 hours	60+ hours

- (2) The library shall provide services during open hours. The library board and director shall establish, adopt, and implement policies to ensure each person choosing to utilize the library has free access to:

~~Everyone has~~(a) a safe, comfortable, reliable, and convenient ~~access to the~~ library facility. ~~and its services.~~

~~(3) Everyone (b) has access to updated and regularly maintained physical and digital library collections, materials, content, programming, and services.~~

~~(4) Everyone can find library materials online.~~

~~(5) Everyone has access to virtual and face to face programming.~~

~~(6) Everyone has access to (c) information about local community and government activities that assists them with understanding local community issues and allows them to engage civically in the community.~~

~~(7) Children and caregivers have access to (d) early childhood literacy programming and materials either through provided by the library or by being directed to another community organization that specializes in early literacy.~~

~~(8) Everyone has access to information about library programs and services through internal and external marketing efforts of library staff.~~

~~(9) Everyone has access to a library website or social media site.~~

~~(10) Everyone can (e) information about how to obtain materials and services from another library through interlibrary loan services.~~

~~(11) Everyone has access to (f) the Internet via library-provided devices or a publicly-accessible wireless network. wired and WIFI connections.~~

(g) information about agencies in the local community which provide educational, early childhood education, adult and child literacy, employment, and work force development opportunities.

(h) library policies and procedures, information about library board and committee meetings, and library budgets.

~~(12) (i) Reasonable accommodations are made so that people with disabilities have which mitigate interference with~~ access to the library's services as required by law.-

(3) The library shall provide electronic access to library resources and information about library materials, services, and programming via the library-managed presence on the Internet. For the purposes of this subsection, a "library-managed presence on the Internet" is that website, social medial account, or other Internet location launched and regularly maintained at the discretion of the library in compliance with applicable accessibility standards. The library board and director shall establish, adopt, and implement policies, procedures, and protocols to ensure each person choosing to utilize the library-managed presence on the Internet is able to:

(a) determine the location of the physical library facility and when the library is open to the public each day of the week.

(b) identify, locate, reserve, or utilize physical and electronic collections, materials, content, and programming, held by or available through the library.

(c) review meeting packets for library board and committee meetings, access library policies and procedures, and access library budgets.

(d) access information about how to participate in library programs, services and events or other library marketing messages.

(e) locate information about agencies in the local community which provide educational, early childhood education, adult and child literacy, employment, and work force development opportunities.

(f) locate information about local community and government activities

(d) access information about early childhood literacy programming provided by the library.

(4) The library board and director shall engage with current and potential patrons to identify and implement other necessary policies, procedures, and protocols to ensure the library serves the community.

Authorizing statute(s): 22-1-103, MCA

Implementing statute(s): 22-1-103, MCA, [22-1-309](#), MCA, [22-1-707](#), MCA