

May 16, 2022

Dana Carmichael
221 Peregrine Lane
Whitefish MT 59937

Negotiated Rulemaking Committee Members:

As a recently retired middle school librarian and teacher, I have tried to follow the work of the ARM 55 Task Force regarding school accreditation and staffing requirements. While I am sympathetic to a need to address the Variances to Standards surrounding school libraries, I don't believe there is a disproportionate lack of certified applicants for library positions when compared to classroom teaching jobs. Likewise, library staffing issues should be solved by The Board of Public Education's recent adoption of alternative pathways to certification, such as the internship program provided by Western Montana College. I fail to understand how further lowering accreditation standards from those of the Task Force will benefit Montana students.

I regularly volunteered for local, county, and state library committees, as well as attending and presenting at several professional conferences. Montana librarians consistently point to rigid teaching schedules, teaching assignments outside the libraries, and a devastation in school funding of libraries as endemic of a complete misunderstanding of what librarians can provide a school community. Elementary librarians are particularly hard hit as most split one daily preparation period for planning lessons to deliver to 5 or 6 grade levels *and* completing the invisible duties of running a healthy library. Colleagues at middle and high schools often choose between lunch or prep to keep libraries open for students. With budgets slashed to \$1.00 per student in our rural school libraries, the struggle is defeating.

Certified librarians are important as advocates for student literacy in text, research, online tools/social media, hands-on application of classroom lessons, and even play. Librarians are trained to be partners to all teachers and experts in curriculum. Librarians work to identify student and staff needs and fill the gaps as partners in learning. They push students to read more challenging materials, provide engaging materials for all reading levels and genre preferences, identify reliable sources of information for research assignments. Librarians even check out computer coding equipment and other tools to extend what students learn in classrooms. A good library will also provide tools to balance inequity challenges, such as ebooks, iPads, or hotspots, so students can seamlessly attend to coursework without drawing attention to financial limitations in their homes. The Negotiated Rulemaking Committee needs to consider all the pieces for healthy school libraries before making a recommendation to the Board of Public Education. **If removal of librarian/pupil ratios is on the table, so too should we consider adopting minimum standards for library budgets, adding flexibly scheduled hours for patrons to use a library.** Please read the proposals as if the strict interpretation of them will become the norm before voting for such sweeping changes.

Sincerely,

Dana Carmichael, Retired Teacher-Librarian