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May 1, 2022

Attn: Montana Chapter 55 Committee
From: Executive Board of the Montana Library Association
Re: ARM 55

We appreciate the committee's continued commitment to supporting school libraries and are grateful you understand the important role that qualified school librarians play in students' academic and social emotional success. As a tier one MTSS and SEL support, libraries offer space for everyone and resources for our most vulnerable populations. As professionals trained to develop inclusive collections, provide resources and instructional materials for SEL aligned digital literacy, and instruct students in the ethical use of information and online materials, librarians are deeply committed and integral to a fully functioning social and emotional support structure - especially important considering the recent adoption of Montana's SEL competencies.

School librarians are also an integral part of the Montana ESSA plan, as noted on page 31; "specific strategies for school improvement will be drawn from the OPI's experience in providing direct technical assistance and support to schools and districts" including "implementing systemic literacy and math improvements through specialized instructional personnel, including a variety of educators as well as library media and digital literacy and math specialists." The plan also states "supporting culturally responsive practices, particularly for American Indian communities" and the IEFA collections distributed by the state are housed in school libraries to allow access to all teachers and support staff.

The best way to provide these vital levels of support for students is to ensure every school has a certified librarian on staff. But, as we realize it may not be financially or logistically possible to require each building to hire a full time librarian, ***we request at minimum maintaining the current staffing ratios while further investigating the issues of variances and a "lack of qualified applicants" for vacancies.***

The changes currently under consideration may unintentionally cause harm to our most vulnerable student populations. Staffing by district rather than by buildings creates a high probability of students losing access to library services and will unfairly impact and strain the remaining librarians' ability to provide services as workloads increase. The "solution" of changing from a building to a school based ratio structure only serves to shift the burden of the variance process from building principals to superintendents while simultaneously lowering the bar. So while this may have the desired effect of a decrease in waiver applications it will also undoubtedly result in a loss of library services to students because the real problem is not the number of waivers but rather the reason for those waivers.

In the last letter we asked you to look into reasons behind the waiver requests, including what the schools applying for variances had in common. Most schools did not share demographic or other commonalities which could shed light on the reason why there are so many variance applications, although most cite a "lack of qualified applicants." This could indicate a number of issues including the very real financial considerations of potential applicants for these partial positions, or a lack of recruiting and encouraging internal applicants to work towards certification, and also suggests the problem of how to recruit and retain more librarians to serve our students is what we need most urgently to address. By solving the wrong problem we may be unintentionally creating new ones.

Please reconsider recommending these new changes until more clearly identifying the problem that needs to be solved. The Montana Library Association strongly recommends maintaining current building level staffing ratios for school librarians.

Sincerely,

The Montana Library Association

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