LSA Document #21-523

As of March 14, 2022

**Comment 1**

**Sent:** Wednesday, March 9, 2022 9:28 AM
**Subject:** Certification Commentary

      I would like to voice my support for changing the rules regarding specific requirements: "Eliminate list of specific library science course subjects required for LC 4 or LC 5."  I am currently attending the University of Wisconsin--Milwaukee for an MLIS degree and two of the required courses listed are irrelevant to my future plans.  Since I am paying out of pocket for these courses, I don't want to waste my money on a course that will not further my knowledge in my desired career field.  I would much rather focus on classes that are directly related to my job.  I will not be able to attend the meeting, but I do feel very strongly about this.  Thank you for allowing us to have a voice!

Stephanie Webster

Reference Supervisor

New Castle-Henry County Public Library

**Agency Response**

**Sent:** Friday, March 11, 2022 3:56 PM
**Subject:** RE: Certification Commentary

This email acknowledges receipt of your comments regarding the Indiana State Library and Historical Board’s proposed rule LSA Document #21-523. The proposed rule is scheduled for a public hearing on Friday, March 18, 2022, at the Indiana State Library in room 401 at 10:00 AM. A summary of all comments received prior to the public hearing will be provided to the Indiana Library and Historical Board at the public meeting, before they make a final decision.

Thank you for your interest and participation in the rulemaking process.

Cheri Harris

Certification Program Director/Legal Consultant

Indiana State Library

**Comment 2**

**Sent:** Wednesday, March 9, 2022 12:37 PM
**Subject:** RE: Certification Update: Public Hearing on Proposed Rules on March 18th

Wow, the removal of required TLEUs seems like a Big Deal, but there’s no explanation or commentary in the section-by-section document.  Any insight on why this change is being made?

Emily Fleischer, MLS (she/her)

Information Services Librarian

Early Literacy Specialist

Brownsburg Public Library

**Agency Response**

**Sent:** Friday, March 11, 2022 5:17 PM
**Subject:** RE: Certification Update: Public Hearing on Proposed Rules on March 18th

This email acknowledges receipt of your comments regarding the Indiana State Library and Historical Board’s proposed rule, LSA Document #21-523. A summary of all comments received prior to the public hearing on March 18th will be provided to the Indiana Library and Historical Board before they make a final decision.

Your comment asks why the proposed rule eliminates the current requirement for a person who holds a 5-year certificate to earn 20 Technology related Library Education Units (LEUs) in 5 years in order to renew the certificate.

By way of background, before 2017, 5-year certificate holders were required to earn 10 LEUs. In 2016, the rules were changed (effective January 1, 2017), to increase that number from 10 to 20. The Public Library Standards and Certification Advisory Committee discussed the Technology LEU requirement at a meeting last summer saying:

* The requirement was needed when it was adopted.
* It is no longer serving the same purpose.
* It results in people having to find classes they don’t need that will fit the requirement.

Indiana restricts rulemaking by state agencies, only permitting adoption of rules that make compliance easier or less restrictive. Before undertaking rulemaking activities an agency must go through a waiver and review process. The Fiscal Impact Statement and Cost Benefit Analysis ISL submitted to the State Budget Agency as part of that review process explained elimination of the technology requirement as follows:

Librarians complained that it was difficult to find technology courses that were of interest. As a result, librarians who were already technology-literate felt forced to take introductory technology courses just to earn the necessary technology LEUs in time. Eliminating technology as a separate category of LEU will make compliance with continuing education requirements easier to accomplish for librarians and easier to administer for the agency.

Although I’m not sure the committee discussed this in quite these terms, it seems worth mentioning that regardless of whether the state has a specific technology requirement, a library can still set its own technology training requirements or competencies for staff.

Thank you for your interest and participation in the rulemaking process.

Cheri Harris

Certification Program Director/Legal Consultant

Indiana State Library

**Sent:** Friday, March 11, 2022 5:32 PM
**Subject:** RE: Certification Update: Public Hearing on Proposed Rules on March 18th

Thanks, I appreciate the explanation.  I don’t have an issue with it going away, I just remember that it was emphasized so much that those were part of the requirements at the beginning.  I was surprised that there wasn’t more explanation given with the proposed rule change.  This might be a good thing to post for the community, just for transparency’s sake (especially since I had one person confidently inform me that the increase to 20 hadn’t gone into effect until this past January.)  I have been fortunate that my library has always given ample opportunities for training on technology, especially with vendor and service platforms that we use day-to-day, so it’s never seemed onerous for me.  I realize that may not be the case for other libraries, especially those that don’t or can’t provide as many automated services.  It sounds like the rule-making committee has done a good job of considering the requirements and practicalities.

If/when this passes, when would it go into effect?  I’m guessing current certificates would still require 20, so the requirement change would start with renewals that happen on a date after the passing?

Emily Fleischer, MLS (she/her)

Information Services Librarian

Early Literacy Specialist

**Sent:** Monday, March 14, 2022 11:23 AM
**Subject:** RE: Certification Update: Public Hearing on Proposed Rules on March 18th

The proposed rules would go into effect on January 1, 2023. That effective date allows time for the State Library to provide training regarding the changes before they take effect.

Removing the technology LEU requirement is intended to ease LEU requirements. Assuming the proposed rule is approved and goes into effect on January 1, 2023, ISL would apply the newly eased requirements to everyone who renews a 5-year certificate after January 1, 2023.

Regarding sharing the reasons for eliminating the separate technology LEU requirement, we will post a summary of comments on the proposed rule and the agency’s response to those comments on the Rulemaking Docket State Library’s which can be found [here](https://www.in.gov/library/services-for-libraries/ldoresources/laws/rulemaking-docket/) on the State Library’s website (<https://www.in.gov/library/services-for-libraries/ldoresources/laws/rulemaking-docket/>). Please note that it might take a day or two before that summary is available under “Materials” on the docket.

Cheri Harris

Certification Program Director/Legal Consultant

Indiana State Library

**Comment 3**

**Sent:** Wednesday, March 9, 2022 3:48 PM
**Subject:** Certification Update - Comment

Thank you for sending out notification of the Certification changes!  I wanted to comment that I'm incredibly excited for the TLEU requirement to go away and for us to be able to focus on obtaining LEUs that better fit our needs, not just fill a TLEU required spot.  My Library's managers just talked about this change today, so I wanted to be sure to let you know we are looking forward to these potential changes!

Julie Bigler

Circulation Department Head

Hussey Mayfield Memorial Public Library

**Agency Response**

**Sent:** Friday, March 11, 2022 3:53 PM
**Subject:** FW: Certification Update - Comment

This email acknowledges receipt of your comments regarding the Indiana State Library and Historical Board’s proposed rule LSA Document #21-523, which is scheduled for a public hearing on Friday, March 18, 2022, at the Indiana State Library in room 401 at 10:00 AM. A summary of all comments received prior to the public hearing will be provided to the Indiana Library and Historical Board at the public meeting, before they make a final decision.

Thank you for your interest and participation in the rulemaking process.

Cheri Harris

Certification Program Director/Legal Consultant

Indiana State Library