



October 18, 2021

Honourable Ric McIver  
Minister of Municipal Affairs  
320 Legislature Building  
10800 - 97 Avenue  
Edmonton, AB, T5K 2B6

Dear Minister McIver:

AUMA would like to thank you and your staff for conducting a more comprehensive red tape reduction review of the *Libraries Act* and Regulation. Ahead of the review, AUMA members expressed some concerns through two resolutions passed at our 2020 Convention about how public libraries are currently being regulated and funded - [Review of Libraries Act](#) and [Current Population Funding for Alberta's Municipal Public Libraries](#).

We appreciated the opportunity to provide input on the Ministry's proposals on all four topic areas at the stakeholder engagement sessions held throughout September, and through the Ministry's survey. I attended three of the engaged sessions myself and was pleased to see significant municipal representation. The member's resolution requesting a review focuses on "requirements for public library boards that serve populations over 10,000 to hire professional librarians", so much of our feedback was on the proposals related to these regulatory provisions.

While the Ministry's proposed increases to the population thresholds that trigger the requirement to hire a professional librarian(s) do appear to have some immediate and/or short term benefits, they do not address certain broader municipal concerns with these requirements as a whole:

- With a population threshold in place, municipalities just over the thresholds will always face the cost of employing a professional librarian(s), which may be considered high in the context of the budgets of smaller municipalities.
- Municipal and intermunicipal library boards that serve larger populations have greater discretion on how to staff and allocate funds to their libraries than those that serve small populations over the threshold. A library board that serves a smaller population is more likely to only have enough money in its budget to hire the professional librarian needed to meet the regulatory requirement restricting its ability to consider other types of staffing options.
- Municipal and intermunicipal library boards that serve larger populations also have greater discretion on how to staff and allocate funds to their libraries than library system boards that serve similar populations. For example, a city with a population of 100,000 with a municipal library board only requires one professional librarian, while a library system that serves the same population would require three professional librarians (down from four under the current requirements).

- Library system boards that include one or more member municipalities with small populations (i.e. under 10,000) that have a municipal (or intermunicipal library) board and have voluntarily chosen to hire a professional librarian still cannot count these librarians in meeting the system board's requirements for professional librarians, despite that the population of these communities will continue to be included in the system's total.

Additionally, municipal representatives emphasized at the engagement sessions that municipalities have many competing financial priorities; so, although councillors acknowledge that the skills of professional librarians can be valuable to their communities, they are making tough financial decisions about how to best use their municipal budgets to meet the specific needs of their residents.

Lastly, Ministry staff advised that libraries legislation and library funding are two separate matters, and that funding is not being looked at as part of the current review of the Act and Regulation. We understand that discussions about library funding are ongoing as part of the province's broader budgeting process. AUMA would, however, like your clarification on how population estimates calculated using the new model will be applied in the context of libraries. Will the 2016 population numbers continue to be used for the allocation of funding to municipalities while 2021 population numbers are used in applying regulatory provisions, such as the thresholds that dictate which library boards must hire professional librarians (and how many must be hired for library system boards)? AUMA recommends that municipalities be asked for feedback on the impacts of applying older population estimates versus current population estimates (based on the new model) for both library funding allocation and application of regulatory requirements.

If you would like to discuss this matter, please feel free to contact me by email at [president@auma.ca](mailto:president@auma.ca) or phone at (780) 868-5103.

Sincerely,



Angela Duncan  
AUMA Interim President