Connecting ESSA to School Libraries

Tuesday, October 25, 2016
Pennsylvania School Librarians Association
(PSLA)
This program is made possible through the matching funds provided by Follett School Solutions. Follett advocates for, and understands, the expertise and dynamic role school librarians play in making a difference in their district’s success.
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- Student Support and Academic Achievement Enrichment Grants (ESSA Block Grants)
# Schedule

**October 25, 2016**

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<td>12:30 pm</td>
<td>Welcome Remarks</td>
<td>Laura Hicks, AASL Director, Region 2</td>
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<td>12:30-1:00 pm</td>
<td>ESSA Overview - Federal and State Timeline - Review of titles that include School Librarians - Call to action</td>
<td>Emily Sheketoff, Executive Director of Washington Office of American Library Association, Laura Hicks, AASL Director, Region 2</td>
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<tr>
<td>1:00-1:30 pm</td>
<td>Review of Pennsylvania DOE - PA Progress in Planning and Implementation - PA DOE response to proposed accountability regulations - ESSA Work Groups</td>
<td>TBD</td>
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<tr>
<td>1:30-1:45 pm</td>
<td>Identifying Stakeholders and Coalitions</td>
<td>Laura Hicks, AASL Director, Region 2</td>
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<td>1:45-2:15 pm</td>
<td>Coalition Development Plan</td>
<td>Small group work</td>
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<td>Report/Share Out</td>
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<td>Break</td>
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<td>2:45-3:15 pm</td>
<td>Review of Key Messages - Elevator Speech Development - Sample Elevator Speech</td>
<td>Laura Hicks, AASL Director, Region 2</td>
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<tr>
<td>3:15-3:30 pm</td>
<td>Elevator Speech Development</td>
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<td>Elevator Speech Practice/Refinement</td>
<td>Small group work</td>
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<td>3:45-4:00 pm</td>
<td>Report/Share Out</td>
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<tr>
<td>4:00-4:15 pm</td>
<td>Review of supplemental handbook material</td>
<td>Laura Hicks, AASL Director, Region 2</td>
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<td>4:15 pm</td>
<td>Closing Remarks/Questions</td>
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Welcome

Laura Hicks
AASL Board of Directors,
Region 2

Handbook
SHARE, SHARE, SHARE

Tag @aasl

#ESSAlibraries

Send photos to jhabley@ala.org

ESSA Webpage

http://essa.aasl.org/

ALA Washington Office

Emily Sheketoff
Executive Director of Washington Office of American Library Association

https://vimeo.com/183396897
Effective School Library Program

The American Association of School Librarians (AASL) supports the position that:

An effective school library program has a certified school librarian at the helm, provides **personalized learning environments**, and offers equitable access to resources to ensure a **well-rounded** education for every student.

Effective School Library Program

As a fundamental component of college, career, and community readiness, the effective school library program:

1. is adequately staffed, including a state-certified school librarian who
   a. is an instructional leader and teacher,
   b. supports the development of digital learning, participatory learning, inquiry learning, technology literacies, and information literacy, and
   c. supports, supplements, and elevates the literacy experience through guidance and motivational reading initiatives;

2. has up-to-date digital and print materials and technology, including curation of openly licensed educational resources; and

3. provides regular professional development and collaboration between classroom teachers and school librarians.

Effective School Library Program Cont.
Title I

Title I – Improving basic programs operated by state and local educational agencies

Message: School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.

https://vimeo.com/183388920

Title II, Part A

Title II: Supporting effective instruction

Message: School librarians share their learning with other professionals when they attend conferences and workshops, applying the benefits of new techniques, strategies, and technologies to the entire district.

https://vimeo.com/183390785

LEARN

Literacy education for all, results for the nation (LEARN)

New literacy program that specifically authorized school librarians to participate in required activities.

https://vimeo.com/183392270
Innovative Approaches to Literacy (IAL)

New authorization that specially authorizes funds to be used for developing and enhancing effective school library programs.

https://vimeo.com/183393334

Title II, Part B

Title II, Part B: Literacy education for all, results for the nation (LEARN)/ Innovative Approaches to Literacy (IAL)

https://vimeo.com/183393643

Message: School librarians are uniquely suited to lead the effort in applying for competitive grants because of their expertise and access to strong professional learning networks.

Title IV, Part A

Title IV, Part A: Student Support and Academic Enrichment Grants (Block Grants)

Message: School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.

https://vimeo.com/183394913
Pennsylvania ESSA Updates

Included in handbook:

- PA’s Progress in Planning and Implementing
  [Link](http://www.education.pa.gov/Documents/About%20PDE/ESSA/June%202014%20Meeting%20Documents/Progress%20in%20Planning%20and%20Implementing.pdf)
- PA DOE response to proposed ESSA accountability regulations
  [Link](file:///C:/Users/acline/Downloads/PA_Dept_of_Education%20-%20Sec_Rivera_Comment_-_Proposed_Accountability_Regs_ESSA.pdf)
- ESSA Work Groups
  [Link](http://www.education.pa.gov/Documents/About%20PDE/ESSA/ESSA%20Work%20Groups.pdf)

Identifying Stakeholders & Building Coalitions
Coalitions

- Critical to identify stakeholders
  - Including at the school, district (LEA) and state (SEA) levels
- Form coalitions
  - Bring together groups and organizations that support libraries
- Think outside the box
  - Utilize relationships and connections with education officials and policymakers in support of the effort
- When anyone thinks of ESSA how do you get them to connect to school libraries
  - Be prepared to talk about positive impact of library programming in the community – How are you making a difference?

ESSA Stakeholder Engagement Required Participants

- Governor
- State legislature
- State boards of education
- Local educational agencies
- Representatives of Indian Tribes located in the state
- Teachers
- Principals & other school leaders
- Specialized instructional support personnel
- Paraprofessionals
- Administration & other staff
- Parents

State Support and Opportunities

- Must provide support to schools not meeting state-determined goals for student and school performance
- Must engage stakeholders and include them in the development of state plans to monitor student and school performance.
- School Librarians are among the list of stakeholders
- Be at the table!
Parents as Stakeholder Partners

- ESSA includes a provision for family engagement. Parents must be “meaningfully consulted” and involved in:
  - State and local Title I plans
  - Title II state and local applications
  - Title III state and local plans
  - Title IV-A local applications
  - Title IV-B state applications
  - State and local report cards
  - School improvement plans

Coalition Development Plan

- Name individual/organization/business
- What previous activities/news tie them to your efforts
- What stake do they have in school library funding
- What can they contribute to your plan
- What three things could you do today to strengthen a relationship with them
Coalition Development Plan

Connect Messages to Stakeholders

Connecting the dots

• Four ESSA areas (Title I, Title II- Part A, Title II- Part B, and Title IV, Part A)
• Review the key messages on your message card
• Connect the dots to your work
ESSA Key Messages

• School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.

• School librarians share their learning with other professionals when they attend conferences and workshops, applying the benefits of new techniques, strategies, and technologies to the entire district.

• School librarians are uniquely suited to lead the effort in applying for competitive grants because of their expertise and access to strong professional learning networks.

• School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.

Key Words/Phrases

• Specialized instructional support staff
• Digital literacy skills
• Academic achievement
• Personalized, rigorous learning experiences
• Adequate access to school libraries
• Use technology effectively
• Effective integration of technology
• Improve instruction and student achievement

ESSA Elevator Speech

https://vimeo.com/183395638
Meaningful Messaging

Elevator Speech - 4 pieces

1. The message
2. The Story & Key Data
3. The Ask
4. The Elevator Speech

Example

Title I: Improving basic programs operated by state and local educational agencies

Message: School librarians and access to effective school library programs impact student achievement, digital literacy skills, and school climate/culture.

Story & Data: A middle school librarian links the reading incentive program to books read and increases in reading scores.

Ask: Include librarians on district-wide school improvement team.
(Audience: District Administrator)
The Elevator Speech:
For the past 3 years, as part of our school-wide reading focus, the library has hosted the Panthers Pounce reading challenge. Last year our students read nearly 11,000 books— that's about 27 books per student. Our reading scores have increased 6%-- 7% for English language learners!— and now students demand to come to the library on the first day of school! Librarians partner with colleagues throughout the building to improve student achievement. Will you include a librarian on the district’s school improvement team?

ESSA Elevator Speech
Reminders:
• The intention is to educate not humiliate.
• What you do is important, so sound important.
• Practice
• You can start the conversation.

Elevator Speech Development
Step One: Make the connection from ESSA language to AASL’s school library talking points to your school library program.

Step Two: Practice

Step Three: Fine Tuning

Step Four: Practice Again
Elevator Speech Development

Step One: Make the connection from ESSA language to AASL's school library talking points to your school library program.

Step Two: Practice

Step Three: Fine Tuning

Step Four: Practice Again
ESSA Federal Legislation Timeline

1965  ESEA was enacted by Congress and signed into law.

1968  Congress expanded ESEA to include new programs (and titles) that serve at-risk children (migrants and neglected children). The Bilingual Education Act was also passed.

1994  The renewal of the ESEA called for states to develop standards and standards-aligned assessments for all students. States and districts were obligated to identify schools that were not making “adequate yearly progress” as detailed in the Improving America’s Schools Act (IASA).

2002  ESEA became NCLB (No Child Left Behind Act). NCLB shifted much of the decision-making and resource allocation away from states. NCLB also significantly expanded testing requirements.

2015  In December 2015, bipartisan support for the ESSA was high and the overdue reauthorization was finally signed into law.
ESSA State Timing, Rules and Implementation

December 10, 2015  
President Obama signs the Every Student Succeeds Act (ESSA) into law

December 22, 2015  
U.S. Department of Education (ED) publishes request for information (RFI) re: regulations on Title I of ESSA

March 21 – April 19, 2016  
ED holds three sessions of negotiated rulemaking (neg-reg) on assessment and supplement, not supplant (SNS) issues

April 27, 2016  
ED releases assessment regulations that were agreed to by the neg-reg committee

May 31, 2016  
ED releases a notice of proposed rulemaking (NPRM) on accountability and state plan issues under Title I

August 1, 2016  
(1) ESEA waivers are null and void, per the statute, and  
(2) comments are due on the NPRM re: accountability and state plan issues

October 1, 2016  
Effective date for competitive programs under ESSA, unless otherwise provided for in the statute

October/November, 2016  
Final regulations published by ED

February/April, 2017  
States submit plans for School Year 2017-2018

May/June, 2017  
ED begins peer review and approves state plans

July 1, 2017  
Effective date for formula grant programs under ESSA

August, 2017  
New state plans take effect in schools at the start of the 2017-2018 school year
OPPORTUNITIES FOR SCHOOL LIBRARIANS

This document highlights library-related provisions in P.L. 114-95, the Every Student Succeeds Act (ESSA) and provides an overview of initial next steps to help maximize opportunities for effective school library programming under the new law.

TITLE I, PART A – IMPROVING BASIC PROGRAMS OPERATED BY STATE AND LOCAL EDUCATIONAL AGENCIES

Background

- Under Title I, Part A of ESSA, States (referred to as State Educational Agencies) and school districts (referred to as Local Educational Agencies) must develop plans to implement federally-funded education activities.

- States and school districts must develop their plans with “timely and meaningful consultation with” teachers, principals and other stakeholders, including “specialized instructional support personnel” which is defined under ESSA as specifically including school librarians.

Library Provisions

- ESSA includes new provisions that authorize – but do not require – school districts to include in their local plans how they will assist schools in developing effective school library programs to provide students an opportunity to develop digital literacy skills and improve academic achievement.

Next Steps

- Because the local application provision related to effective school library programming is allowable (not required from the federal level), it is critical that school district personnel be made aware of their ability to develop and implement effective school library programming.

- Contact and work with the superintendent’s office in developing the local plan under Title I, Part A to ensure that the school district takes into consideration:
  
  o The importance of developing and maintaining effective school library programs; and
  
  o How effective school library programs can help with the development of digital literacy skills and improve academic achievement.

- Contact and work with State and school district officials regarding the ability of school librarians to participate in both the State and school district planning and application process (as part of “specialized instructional support personnel”).
TITLE II, PART A – SUPPORTING EFFECTIVE INSTRUCTION

Background

- Title II, Part A of ESSA provides funds for States and school districts to increase academic achievement through professional development.

Library Provisions

- ESSA includes new provisions that authorize States, as well as school districts, to use grant and subgrant funds for “supporting the instructional services provided by effective school library programs.”

Next Steps

- Because States and school districts can now use their Title II, Part A funds specifically to support effective school library programming, it will be important to make sure that school district and school personnel that develop and implement professional development activities are aware of the new uses of funds related to libraries.

- Work with school district and school personnel to encourage the use of Title II, Part A funds specifically for effective school library programming, as well as part of other professional development efforts taking place with these funds.

  - Note that under the No Child Left Behind Act (NCLB), Title II, Part A funds were primarily used for professional development for “teachers” which made it difficult for other instructional support personnel to participate in activities. ESSA rectifies this by specifically authorizing funds to be used to support instructional services provided by effective school library programs.

TITLE II, PART B, SUBPART 2 – LITERACY EDUCATION FOR ALL, RESULTS FOR THE NATION (LEARN)

Background

- ESSA includes a new literacy program that provides federal support to States to develop, revise, or update comprehensive literacy instruction plans. States award competitive subgrants to school districts for activities that focus on children in kindergarten through grade 5 as well as children in grades 6 through 12.

Library Provisions

- ESSA specifically authorizes school librarians to participate in required grant activities that focus on children in kindergarten through grade 5 as well as activities that focus on children in grades 6 through 12.

- In addition, ESSA allows all local subgrants (that serve children in kindergarten through grade 5 and/or children in grades 6 through 12) to be used to provide time for teachers and school librarians to meet, plan and collaborate on comprehensive literacy instruction.
Next Steps

- Since this is a new competitive program under ESSA, it will be important to work with individuals responsible for literacy instruction and development at the State, school district, and school level.

- Encourage/assist appropriate State, school district, and/or school personnel in developing and applying for grants or subgrants.
  - Note that subgrants awarded for local uses of funds must include professional development for school personnel that specifically includes school librarians. Therefore, any grants awarded at the school district level under this program must provide professional development for school librarians.

TITLE II, PART B, SUBPART 2, SECTION 2226 – INNOVATIVE APPROACHES TO LITERACY (IAL)

Background

- ESSA includes a new authorization of the Innovative Approaches to Literacy (IAL) program (previously funded through appropriations legislation) that provides dedicated funding to promote literacy programs in low income communities.
  - Note that while IAL activities have been funded over the past several years through appropriations bills, the “codification” (or explicit authorization) of this program in ESSA provides a specific “line item” to help better secure funding in future years.

Library Provisions

- ESSA specifically authorizes funds to be used for developing and enhancing effective school library programs, which includes providing professional development for school librarians, books, and up-to-date materials to high need schools.

Next Steps

- Since IAL is a competitive grant program that has been funded in the past (through appropriations), but is newly authorized under ESSA, it will be important to focus advocacy efforts at the federal level to ensure enough funds are appropriated to continue and possibly expand the IAL program.
  - Note that while efforts to fund IAL in the past have been successful, the lack of an explicit authorization for these activities has hindered advocacy efforts related to expanding the program. The specific authorization of IAL under ESSA will help with future funding as Congress has expressed its support for these activities under the most recent authorization of the Elementary and Secondary Education Act.
TITLE IV, PART A – STUDENT SUPPORT AND ACADEMIC ENRICHMENT GRANTS (BLOCK GRANT)

Background

- ESSA authorizes a new program to provide Student Support and Academic Enrichment activities (commonly referred to as the “Block Grant” under ESSA) to help States and school districts target federal resources on locally-designed priorities.
  - Funds are allocated to States and then school districts based on their share of Title I, Part A funding (formula grant allocated on the basis of poverty).

Library Provisions

- ESSA authorizes (but does not require) States to use funds to assist school districts in providing programs and activities that increase access to personalized, rigorous learning experiences supported by technology, including adequate “access to school libraries.”

- ESSA also authorizes (but does not require) States to use funds to assist school districts in providing school librarians and other school personnel with the knowledge and skills to use technology effectively, including effective integration of technology, to improve instruction and student achievement.

- In developing their local applications, school districts must consult with teachers, principals and other stakeholders, including “specialized instructional support personnel” which is defined under ESSA as specifically including school librarians.

- In addition, ESSA requires that school districts conduct a “needs assessment” prior to receiving funds from the State (that must be conducted every 3 years). The needs assessment must include access to personalized learning experiences (which may include access to school libraries).

Next Steps

- Because States are authorized (and not required) to support school districts by providing programs and activities that increase access to personalized learning experiences (which may include professional development for school librarians and better access to school libraries for students), it will be important to contact and work with State Educational Agency officials to make them aware of their ability to use funds in support of personalized learning experiences.

- Since school districts are required to consult with stakeholders that may include school librarians on the development and implementation of their local activities, it is critical to work with technology leaders at the school and school district levels to ensure that school librarians can adequately participate in the planning process.
Title IV, Part A of ESSA: Student Support and Academic Enrichments Grants

Description of Grants
The newly enacted bipartisan Every Student Succeeds Act (ESSA) includes a flexible block grant program under Title IV Part A, which is authorized at $1.65 billion in FY 2017. Title IV, Part A authorizes activities in three broad areas:

1) Providing students with a well-rounded education (e.g. college and career counseling, STEM, arts, civics, IB/AP)
2) Supporting safe and healthy students (e.g. comprehensive school mental health, drug and violence prevention, training on trauma-informed practices, health and physical education) and
3) Supporting the effective use of technology (professional development, blended learning, devices).

Distribution of Funds
Each state will receive an allocation based on the Title I funding formula. Using the same Title I formula, the states will then allocate funds to school districts.

Any school district that receives a formula allocation above $30,000 must conduct a needs assessment and then must expend 20 percent of its grant on safe and healthy school activities and 20 percent on activities to provide a well-rounded education programs. The remaining 60% of the money can be spent on all three priorities, including technology. However, there is a 15% cap on devices, equipment, software and digital content.

If a district receives an allocation below $30,000, the law does not require a needs assessment or setting aside percentages for well-rounded and safe and healthy students programs. It must spend money on activities in at least one of the three categories. The 15 percent technology purchase cap would continue to apply.

President's FY17 Budget Request
The President's FY 2017 budget proposal would provide $500 million for the Title IV flexible block grant, less than one-third of the authorized $1.65 billion level. The Administration also requested to include language in the appropriations bill that would allow states to distribute $50,000 per year to districts on a competitive basis and would allow states to limit their spending to just one of the three listed priorities, or specific activities within one of the priorities.

Since the Student Support and Academic Enrichments Grants program is the third largest authorized program in ESSA, failing to adequately fund it, as the President’s FY 2017 budget proposes to do, will undermine the bipartisan Congressional intent in passing this important law.

Program Funding Need
Strong evidence demonstrates the need for students to have access to health and safety programs, a diversity of academic programs, and modern technology.

- Evidence supports a direct correlation between physical and mental health and learning that is essential to academic success, school completion, and the development of healthy, resilient, and productive citizens. Schools are uniquely positioned to help students acquire life-long knowledge and skills through comprehensive health education, physical education, nutrition, comprehensive school mental and behavioral health services, counseling, and integration among all education and health programs.
- In order to prepare students to succeed, they need access to a well-rounded curriculum. Funds through the block grant will help schools expand music, art, STEM, computer science, accelerated learning, history, and civics courses, as well as expand access to college and career guidance and counseling.
Federal investments in education technology ensure schools have technology-proficient educators, well equipped classrooms, sufficiently supported administrative structures, and a curriculum optimized to take advantage of the benefits technology offers to all students—such as closing the opportunity and learning gaps and providing students with essential modern workforce skills.

Given the elimination under the Every Student Succeeds Act (ESSA) of numerous programs that support the overall health and safety of students, the investments in education technology, as well as helping districts ensure access to a well-rounded education, a robust federal investment in support of these programs is absolutely essential through Title IV Part A. Without a significant investment in Title IV, Part A, districts will be forced into choosing which of the priorities to invest in—even though an ample investment in all three is necessary to providing students with a comprehensive education.

For further information, or if any questions arise, please contact Sunil Mansukhani at The Raben Group, smansukhani@rabengroup.com or Jon Bernstein at Bernstein Strategy Group, jbernstein@jbernsteinstrategy.com.
Every Student Succeeds Act (ESSA): PA’s Progress in Planning & Implementation

PA State Board of Education Meeting
July 13, 2016

Adam Schott, Special Assistant to the Secretary
Samantha Koch, Executive Policy Specialist

No Child Left Behind vs. ESSA

• What hasn’t changed:
  – Standards (“challenging”)  
  – Annual assessments  
  – Accountability and transparency (data reporting)  
  – Requirements to improve low-performing schools  
  – Disaggregation by race, low-income, English learner, students with disabilities  

• What has changed:
  – Greater flexibility for states and LEAs
ESSA Focus Areas & Other Themes

PDE Vision:
Pennsylvania learners will be prepared for meaningful engagement in postsecondary education; in workforce training; in career pathways; and to be responsible, involved citizens.

Other Underlying Themes:
- Equity (At-Risk/Vulnerable Students)
- PreK-12+ Continuum
- College & Career Readiness
- Data & Transparency

ESSA Planning & Stakeholder Engagement

USDE issues proposed rulemaking on Accountability, State Plans (May 26, 2016)

Stakeholder Sessions (April 28) → Work Group Meeting #1 (June 14) → Work Group Meeting #2 (August 30) → Stakeholder Session & Report Release (October 18) → Phase 2 of Stakeholder Engagement (Fall 2016-Spring/Summer 2017)

USDE issues proposed rulemaking on Assessments (July 6, 2016)
Phases of Stakeholder Engagement in PA

1. Work groups are **Phase One** of stakeholder engagement required under ESSA.
   - PA’s ESSA work groups are charged with exploring four special areas that provide significant new flexibility.

2. PDE will begin **Phase Two** of stakeholder engagement this fall during development of PA’s ESSA State Plan.

Stakeholder Discussions - Assessments

- **Underlying Themes & Tensions**
  - Shorter assessments
  - Assessment should have open-ended/performance tasks that measure higher-order thinking skills; more authentic assessment
  - “Real time” results to inform instruction and student improvement
  - Detailed results on student performance
  - Relatively inexpensive
Stakeholder Discussions - Accountability

• Underlying Themes & Tensions
  – Reliance on achievement/point-in-time assessments for accountability system (rigid)

  – Move away from a “one size fits all” approach
    • Growth, measures of school climate, career readiness

  – Addressing out-of-school factors like parent/community engagement, poverty, structural racism

  – Staff shortages, funding issues

Stakeholder Discussions – Educator Certification

• Underlying Themes & Tensions
  – Current silo-based approach not working
    • Need to foster better collaboration between school districts and postsecondary institutions
    • Supporting flexibility, reciprocity, and mobility

  – Gap between theory and practice for preparing educators and leaders

  – Accessibility, equity, and quality as vital goals

  – Need for better “real time” data
Student vs. Educator Diversity in PA

Student Diversity
- White: 29%
- Minority: 71%

Educator Diversity
- White: 4%
- Minority: 96%

Trends: Enrollment in Prep Programs in PA

PA Education Majors – All Students
- White Students - Education Majors
- Black, Hispanic/Latino & AAPI Students - Education Majors

PA Education Majors – Black, Hispanic/Latino & AAPI
- Black Education Majors
- Hispanic/Latino Education Majors
- AAPI Education Majors
Trends: Education Graduates in PA

4/28 Discussions – Educator Evaluation

- **Underlying Themes & Tensions**
  - General support for observation side of system
  - Authentic/ongoing input from educators
  - Collaboration and peer supports
  - Implications of Act 82 / School Performance Profile on educator evaluation and equity
ESSA Resources

- PDE’s *Every Student Succeeds Act (ESSA)* resource page
  - ESSA vs. NCLB crosswalk document

Looking Ahead & Next Steps

- Continue stakeholder engagement

- Release of work groups’ framework recommendations
  - October 18, 2016 report release event – Harrisburg, PA & livestreamed

- Review of federal guidance; public comment; ongoing dialogue with General Assembly

- PDE submits ESSA State Plan
  - Spring or summer 2017
The mission of the department is to ensure that every learner has access to a world-class education system that academically prepares children and adults to succeed as productive citizens.

The department seeks to establish a culture that is committed to improving opportunities throughout the Commonwealth by ensuring technical support, resources, and optimal learning environments are available for all students, whether children or adults.
July 29, 2016

Meredith Miller
U.S. Department of Education
Room 3C106
400 Maryland Avenue, SW
Washington, D.C. 20202-2800

Dear Ms. Miller:

The Pennsylvania Department of Education (POE) appreciates the opportunity to submit public comment concerning the U.S. Department of Education’s (USDE) proposed Accountability and State Plans rulemaking under the Every Student Succeeds Act (ESSA). I also wish to thank you and your team for your active, ongoing efforts to gather public feedback on the law’s implementation, and for the proposed rules’ emphasis on meaningful, ongoing stakeholder engagement during the planning, development, and adoption of State Plans; these discussions are vital safeguards against the significant unintended consequences associated with the prior reauthorization of the Elementary and Secondary Education Act (ESEA).

First, we wish to applaud certain positive aspects of this rulemaking. The regulations proposed by USDE represent a good first step towards fulfilling ESSA’s promise of ensuring that all students, from pre-kindergarten to postsecondary, as well as low-income students, students of color, students with disabilities, English learners, and other historically marginalized students – have access to a world-class education that prepares them for college, career, and life. POE especially appreciates the flexibility the proposed regulations would provide for states when designing evidence-based interventions for low-performing schools identified for comprehensive or targeted support and improvement. USDE’s recognition that schools require smart, innovative, and tailored supports is welcome.

Our comments relate to the systems that will lead to the identification of these schools in the first instance and a concern that the proposed rulemaking, while well intentioned, may deprive states from taking full advantage of the spirit of flexibility that accompanied the reauthorization. It is important to note that POE shares a belief expressed by many state chiefs, leading education organizations, and countless education stakeholders regarding what appears to be an overreach of USDE’s statutory authority. However, as a career-long public school educator, I would prefer to focus on the practical impact of the proposed rulemaking, and the ways in which this approach would risk a repeat of the overly prescriptive No Child Left Behind-era reforms. We will focus our comments in five key areas:
1. The timeline for identification of schools for comprehensive and targeted support and improvement (Proposed § 200.19);

2. The focus on grade-level proficiency as the primary indicator of academic achievement for accountability purposes (Proposed § 200.14);

3. The weighting and selection criteria for School Quality or Student Success indicators (Proposed § 200.14 and § 200.18);

4. The requirement that indicators within a state's system of annual meaningful differentiation be tied to "at least three distinct levels of performance" (Proposed § 200.18); and

5. The use of four-year adjusted cohort graduation as a default accountability measure for all high schools (Proposed § 200.13 and § 200.34).

We outline our concerns in each of these areas below, and suggest alternative approaches for consideration by USDE.

1. **Timeline for identification of schools for comprehensive and targeted support and improvement** (Proposed § 200.19)

   The most important test of a fair accountability system is whether schools, systems, and states have both a clear understanding of expected performance and the resources necessary to meet those expectations. Proposed § 200.19 fails to meet this standard by requiring that states begin identifying schools for comprehensive and targeted support for the 2017-2018 school year based "at a minimum, on... performance in the 2016-2017 school."

   This proposal is problematic as it would require a state to identify schools for support and improvement prior to USDE approval of the state’s Single Statewide Accountability Plan and well ahead of full implementation of the resources and strategies tied to that plan. This timeline will be confusing for states and districts, and risks a rushed, compliance-driven approach to the important work of designing strong accountability systems.

   **Recommended Approach:** PDE believes states should be able to freeze current focus and priority lists for the 2016-2017 and 2017-18 school years, to ensure sustained focus on these high-need schools and provide important breathing space to design new accountability systems that incorporate well-researched and carefully-vetted indicators. This approach would ensure that identification of schools is forward-looking, responsive to USDE review of State Plans, and based on school years in which expectations and resources are well-aligned.
2. **Grade-level proficiency as the primary indicator of academic achievement for accountability purposes** (Proposed § 200.14)

The proposed regulations’ focus on measuring academic achievement based on “grade-level proficiency” reinforces an unintended consequence of No Child Left Behind: a disproportionate focus on students on the cusp of proficiency at the expense of students at lower achievement levels. In addition, this focus on proficiency often masks important differences between schools identified as low-performing through state accountability systems. For example, under a proficiency-focused accountability system, the percentage of students who score “basic” and “below basic” is not deemed relevant in determining school performance, relegating schools that have made significant progress in moving students out of the lowest proficiency level to the same category as schools that have made no such progress. Through its discussions with educators and stakeholders in efforts to redesign the PA School Performance Profile, PDE heard a clear and repeated need to move beyond proficiency rates as the sole or primary measure of school success, and therefore contemplated weighting movement from “below basic” to “basic” (as well as additional credit for moving students from “proficient” to “advanced”). Such an approach incentivizes providing support to all students, and ensures that schools achieving success with larger proportions of low-achieving students are not unfairly disregarded through narrow accountability indicators.

**Recommended Approach**: PDE recommends that USDE revise its proposed regulations to permit the use of scale scores or indexes that allocate points for schools based on multiple levels of performance.

3. **Proposed weighting and selection criteria for School Quality or Student Success indicators** (Proposed § 200.14 and § 200.18)

PDE believes the inclusion of indicators of student success and school quality represents a welcome change from the previous iteration of ESEA that relied solely on snapshot achievement data measured by standardized assessments.

The ESSA also supports the direction the commonwealth has adopted regarding standardized tests – namely, that they can be a useful tool and benchmark, but should not be the sole indicator of success. Over the past year – and prior to the ESSA’s enactment – PDE has engaged thousands of teachers, school leaders, advocates, community members, and policymakers in a robust dialogue concerning the metrics Pennsylvania currently uses to measure school performance. In these conversations, stakeholders have voiced enthusiastic support for measures of school quality and student success including college and career readiness indicators, access to advanced coursework, student engagement, and partnerships and programs designed to extend the reach of high-quality early childhood programs. We believe strongly that these and other indicators can more fully describe schools’ impact on students and that drive targeted improvements.
USDE’s proposed regulations regarding the selection of non-academic indicators would limit the potential for statewide accountability systems under the ESSA to be based on more than point-in-time achievement as measured by standardized assessments. And the requirement in proposed §200.18 that these same non-academic indicators are peripheral for purposes of identifying schools for comprehensive or targeted support and improvement is contrary to the original spirit of ESSA, and increases the likelihood that states will opt not to invest in the difficult but necessary work of refining and validating measures that can broaden conceptions of school performance.1 From either perspective, this is another clear instance of the proposed rulemaking eroding the spirit of flexibility that accompanied the ESSA.

**Recommended Approach:** USDE should allow states to demonstrate adequate systems for meaningful differentiation for all indicators, including non-academic indicators, by requiring that states define and demonstrate adequate variability among schools; USDE would evaluate the proposed definition and demonstrations through its review of State Plans. In addition, states should be permitted to demonstrate how selected indicators aid in the implementation of comprehensive and targeted school improvement strategies, including research and evidence supporting the connection of those indicators to improving student achievement and outcomes.

4. **Requirement that indicators within a state’s system of annual meaningful differentiation be tied to “at least three distinct levels of performance”** (Proposed § 200.18)

PDE believes that this requirement is overly prescriptive and harkens back to the false precision and gamesmanship that characterized the NCLB era. Evidence and experience tell us that there is likely no meaningful difference in performance between a school that falls just above an arbitrary cut point and a school that falls just below it; at the same time, there are likely very real differences between schools that sit at opposite ends of the same performance level. In this way, performance levels can simultaneously label schools unfairly and mask important distinctions.

**Recommended Approach:** States should be afforded flexibility in describing and differentiating school performance, to include descriptive data and data dashboards.

5. **Use of the four-year adjusted cohort graduation as the default accountability measure for all high schools** (Proposed § 200.13 and § 200.34)

PDE believes strongly that high school graduation rate is a vital part of any robust accountability system. We are concerned, however, that the specific requirement for the use of the four-year cohort rate would systematically, disproportionately, and unfairly impact schools that serve high numbers of

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1 Section 1111(c)(4)(B)(v) of ESEA, as amended by ESSA, requires that any indicator(s) of school quality or student success selected by states for accountability purposes “allows for meaningful differentiation in school performance” and “is valid, reliable, comparable, and statewide.”
returning students, adjudicated youth, refugee populations, and other vulnerable populations who may require additional time and resources to earn a diploma. While the proposed regulations allow for inclusion of an extended-year graduation rate, the requirement that states using this metric establish “more rigorous” long-term goals than those based on the four-year rate is unclear.

**Recommended Approach:** USDE should clarify expectations regarding “more rigorous” long-term goals for states that report both four- and extended-year cohort graduation rates for accountability purposes.

**SUMMARY**

PDE would like to reiterate its strong support for many aspects of the ESSA, especially as it relates to flexibility for states in the design and implementation of interventions for low-performing schools. We are concerned, however, that significant elements of the proposed rules are simply too prescriptive to work well across our commonwealth’s 500 diverse school districts, and will prevent our educators and stakeholders from tailoring policies to align with the local context that was too often obscured by the last wave of top-down federal reform. In other words, the ESSA can be a powerful tool for improving educational access, opportunity, and outcomes in communities across Pennsylvania and nationwide—but only if those same communities have voice and a choice in its implementation. A timeline that allows for fair and coherent introduction of school performance indicators, state flexibility in the area of specific performance determinations, and the ability to utilize more holistic measures of school quality and student success are vital for meeting these goals and honoring the spirit of flexibility that defined the law’s reauthorization.

Sincerely,

Pedro A. Rivera
Secretary of Education

CC: Governor Tom Wolf
PA Congressional Delegation
Members, PA Senate and House Education Committees
Coalition Development Plan

Of course there are some “assumed” coalition groups- teachers, parents and administrators. But this is an opportunity to think outside the box and garner support from the community at large. Who in your community would have a stake in local school district plans to ensure that school library programs provide students an opportunity to develop digital literacy skills and improve academic achievement? Who needs to have college and career ready individuals graduating today?

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<thead>
<tr>
<th>Individual/Organization/Business Name</th>
<th>What previous activities, news or accomplishments tie them to your efforts?</th>
<th>What stake do they have in school library funding?</th>
<th>What can they contribute to your plan?</th>
<th>What three things could you do today to strengthen a relationship with them?</th>
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ESSA Key Messages
“Ask Me How School Librarians Ensure Student Success”

Title I  Improving basic programs operated by state and local educational agencies

Message
School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.

Title II  Supporting effective instruction

Message
School librarians share their learning with other professionals when they attend conferences and workshops, applying the benefits of new techniques, strategies, and technologies to the entire district.

Title II, Part B  Literacy education for all, results for the nation (LEARN)/ Innovative Approaches to Literacy (IAL)

Message
School librarians are uniquely suited to lead the effort in applying for competitive grants because of their expertise and access to strong professional learning networks.

Title IV, Part A  Student Support and Academic Enrichment Grants (Block Grants)

Message
School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.
You’ve found yourself faced with the questions, “Are there really any libraries left?” “What with e-books and Internet are they necessary?” You’ve been asked these questions in a situation in which you know a true conversation is not possible, so how do you make the most impact in the least amount of time? Develop your messages now, and practice!

**Step One:** Make the connection from ESSA language to AASL’s school library talking points to your school library program.

<table>
<thead>
<tr>
<th>ESSA KEY MESSAGES</th>
<th>STORY AND KEY DATA</th>
<th>THE ASK (What’s the need? Who are you talking to?)</th>
<th>PULLING IT ALL TOGETHER</th>
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<tr>
<td>School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture. (Title I)</td>
<td>INSERT STORY</td>
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CRAFTING YOUR ESSA ELEVATOR SPEECH

**The MESSAGE:**
What do you need your audience to know?

**The STORY & KEY DATA:**
Connect the message specifically to your work, with a quick fact/data and story.

**The ASK:**
Consider who you are talking to, what they care about, and what it is within their power to impact. Make a specific request.

**The ELEVATOR SPEECH**
Packages the above in a way that is short, personal and memorable.

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**Example**

School librarians and access to effective school library programs positively impact student achievement and school climate/culture.

A middle school librarian links the reading incentive program to books read and increases in reading scores.

Include librarians on district-wide school improvement team. (Audience: District Administrator)

For the past 3 years, as part of our school-wide reading focus, the library has hosted the Panthers Pounce reading challenge. Last year our students read nearly 11,000 books—that’s about 27 books per student. Our reading scores have increased 6%--7% for English language learners—and now students demand to come to the library on the first day of school! Librarians partner with colleagues throughout the building to improve student achievement. Will you include a librarian on the district’s school improvement team?
### Elevator Speech Examples

<table>
<thead>
<tr>
<th>ESSA KEY Messages</th>
<th>Story and Fact/Data</th>
<th>The Ask</th>
<th>Pulling It All Together</th>
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<tbody>
<tr>
<td>[Title I]</td>
<td>Nearly 60 percent of first year college students require some remediation.(^1) The critical thinking and research skills developed in an effective school library program are essential components of college readiness.</td>
<td>Ensure that students have access to school library programs throughout K-12 schooling.</td>
<td>We are seeing a disparity in preparedness among our incoming students. We count on students having digital literacy and information literacy skills that will allow them to do college level work and, all too often, those skills must be remediated. That deficit negatively impacts student engagement, retention, and academic performance. Please use Title I funds to help close that gap and ensure that all students in [state] have access to effective K-12 school library programs. (Speaker: College Administrator. Audience: State Legislator or Board of Ed Official.)</td>
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| [Title II, Part A] | Librarians lead professional development and committees. In this district, librarians trained teachers so that students can maintain digital portfolios across content areas. | Include school librarians in Title II funding plans for the state. | My librarians are integral to staff development and, in addition to leading committees throughout our district, they deliver quarterly professional development workshops for our teachers. Because of the librarians, our middle school students now have cross content digital portfolios. I urge you to specifically identify school librarians in state plans for use of Title II funds. (Speaker: District Administrator. Audience: State Board Official.) |

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\(^1\) National Center for Public Policy and Higher Education, “Beyond the Rhetoric: Improving College Readiness Through Coherent State Policy,”
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<th>Title II, Part B, Subpart 1</th>
<th><strong>I have written more than $25,000 in grants, and my literacy action research project provided the data and supporting documentation for our district’s successful IAL grant last year.</strong></th>
<th><strong>Appoint a librarian to the district’s Title II grant team.</strong></th>
<th><strong>Through successful grant writing, I have secured more than $25,000 in library resources that are shared by teachers and students throughout the school. In addition, my literacy action research was incorporated into the district’s IAL grant. Please appoint me to the district’s Title II grant team. (Speaker: Librarian. Audience: District Administrator.)</strong></th>
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<td>Title IV, Part A</td>
<td><strong>I work with the 5th grade science teacher to provide supplementary materials to the textbook for struggling and advanced readers. This allows all students to understand the core principals of topics such as electricity, and to scaffold to texts of higher reading levels.</strong></td>
<td><strong>Allocate block grant funds for library resources.</strong></td>
<td><strong>Our school library offers digital and print materials that are accessible to every student in the building and this is critically important to our diverse population. When our 5th graders do their science unit on electricity, the library is able to supplement the text with materials from our shared databases, which even include audio support for struggling readers and English language learners. We also offer supplemental reading materials for kids performing above grade level. It is critical to have these resources in a place where all students and teachers can access them; please ensure that state’s implementation plan includes school libraries in its programs eligible for Title IV funds. (Speaker: Librarian. Audience: State Board Official.)</strong></td>
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Glossary

The following are definitions that appear in either AASL board approved position statement or as defined under the US Department of Education.

**Appropriate Staffing** (for school libraries):

1. The library program is serviced by one or more certified school librarians working full-time in the school library.

2. The specific number of additional school librarians is determined by the school’s instructional programs, services, facilities, size, and number of students and teachers.

3. In addition to library-degreed professionals, highly trained technical and clerical support staff are necessary for all library programs at every grade level. Each school should employ at least one full-time technical assistant or clerk for each school librarian. Some programs, facilities, and levels of service will require more than one support staff member for each professional.

4. The school district is served by a district library supervisor who provides leadership and support for the building-level school library programs by providing resources, professional development, and leadership in developing and implementing the district’s school library program. The district library supervisor is a member of the administrative team and helps determine the criteria and policies for the district’s curriculum and instructional programs. The district library supervisor communicates the mission, strategic plan, goals, and needs of the school and district library programs to the superintendent, board of education, other district-level personnel, and the community.

**Collaboration:**

Working with a member of the teaching team to plan, implement, and evaluate a specialized instructional plan.

**Community Readiness:**

The ability to be a productive, active, engaged member of a democratic society.

**Digital Learning:**

Learning materials and resources displayed on a digital device and shared electronically with other users. Digital learning content can be both open and/or commercial content (U.S. Dept. of Education 2016).
Digital Literacy:

The ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills (ALA 2013).

Effective School Library Program:

1. is adequately staffed, including a state-certified school librarian who
   - is an instructional leader and teacher,
   - supports the development of digital learning, participatory learning, inquiry learning, technology literacies, and information literacy, and
   - supports, supplements, and elevates the literacy experience through guidance and motivational reading initiatives;

2. has up-to-date digital and print materials and technology, including curation of openly licensed educational resources; and

3. provides regular professional development and collaboration between classroom teachers and school librarians.

Information Literacy:

A set of abilities requiring individuals to recognize when information is needed and have the ability to locate, evaluate, and use effectively the needed information (ACRL 2000).

Information Technologies:

Modern information, computer, and communication technology products, services, or tools, including the Internet, computer devices, and other hardware, software applications, data systems, and other electronic content (including multimedia content) and data storage.

Learning Community:

A group of people (can include students) who share common academic goals and attitudes who meet regularly to share expertise and work collaboratively to improve instruction and the academic performance of students.

Local Education Agencies (LEA):

A public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State, or for a combination of school districts or counties that is recognized in a State as an administrative agency for its public elementary schools or secondary schools.
Specialized Instructional Support Personnel (school librarians):

Under ESSA, perform a wide range of activities in schools, including a broad array of prevention and intervention services that promote effective teaching and learning and promote school success. SISP also collaborate with teachers and school staff to ensure that students receive high quality instruction responsive to their diverse academic, physical, social, emotional, and mental health needs.

State Education Agencies (SEA):

A formal governmental label for the state-level government agencies within each U.S. state responsible for providing information, resources, and technical assistance on educational matters to schools and residents.

Virtual Resources:

Resources that are not physical in nature, such as computer hardware platforms, operating systems, storage devices, computer network resources, electronic databases, and e-books.
Definition for Effective School Library Program

POSITION:

The American Association of School Librarians (AASL) supports the position that an effective school library program has a certified school librarian at the helm, provides personalized learning environments, and offers equitable access to resources to ensure a well-rounded education for every student.

As a fundamental component of college, career, and community readiness, the effective school library program:

1. is adequately staffed, including a state-certified school librarian who
   a. is an instructional leader and teacher,
   b. supports the development of digital learning, participatory learning, inquiry learning, technology literacies, and information literacy, and
   c. supports, supplements, and elevates the literacy experience through guidance and motivational reading initiatives;

2. has up-to-date digital and print materials and technology, including curation of openly licensed educational resources; and

3. provides regular professional development and collaboration between classroom teachers and school librarians.

Effective school libraries are dynamic learning environments that bridge the gap between access and opportunity for all K–12 learners. Under the leadership of the school librarian, the school library provides students access to resources and technology, connecting classroom learning to real-world events. By providing access to an array of well-managed resources, school libraries enable academic knowledge to be linked to deeper, personalized learning. The expanded learning environment of the school library ensures the unique interests and needs of individual students are met. In this way, effective school library programs prepare students for college, career, and community.

Under the leadership of a certified school librarian, the effective school library program delivers a well-rounded educational program (AASL 2009). This program focuses on accessing and evaluating information, providing digital learning training and experiences, and developing a culture of reading. The program uses a variety of engaging and relevant resources. Robust school libraries have high-quality, openly licensed digital and print resources, technology tools, and broadband access. This environment is essential to providing equitable learning opportunities for all students. More than 60 studies in two dozen states show that the “levels of library funding, staffing levels, collection size and range, and the instructional role of the librarian all have a direct impact on student achievement” (Gretes 2013).

In an effective school library program, the school librarian serves as an instructional leader, program administrator, teacher, collaborative partner, and information specialist (AASL 2009). Working with classroom teachers, the school librarian develops information literacy and digital literacy instruction for all students. Serving as an instructional leader, the school librarian contributes to curricular decisions and facilitates professional learning. Additionally, as the library program administrator, the school librarian oversees and manages the program and works with school and community partners. These partnerships result in expanded and improved resources and services for all students.
An effective school library program plays a crucial role in bridging digital and socioeconomic divides. School library programs staffed with state-certified professionals provide an approachable, equitable, personalized learning environment necessary for every student’s well-rounded education.

BACKGROUND:
The Every Student Succeeds Act (ESSA) includes language for “effective school library programs” in the provisions of Title I, Part A; Title II, Part A; Title II, Part B, Subpart 2; Title II, Part B, Subpart 2, Section 2226; and Title IV, Part A. The definition of an effective school library program provides guidance to administrators, school boards, and school librarians in implementing ESSA.

DEFINITIONS:
- **Collaboration**: Working with a member of the teaching team to plan, implement, and evaluate a specialized instructional plan.
- **Community Readiness**: The ability to be a productive, active, engaged member of a democratic society.
- **School Librarian Instructional Role**: Instructional Role of School Librarians Position Statement

REFERENCES:

DISCLAIMER:
The position taken by the American Association of School Librarians (AASL) represents the organization and cannot be applied to individual members or groups affiliated with the association without their direct confirmation.

APPROVAL/REVISION DATES: June 25, 2016
Appropriate Staffing for School Libraries

POSITION:
The American Association of School Librarians (AASL) supports the position that every student in every school, including independent schools and public charter schools, should have access to an updated school library with a certified school librarian. The success of a school library program, no matter how well designed, ultimately depends on the quality and number of personnel responsible for managing the instructional program and the library’s physical and virtual resources. A certified school librarian, supported by technical and clerical staff, is crucial to an effective school library program. Every student, teacher, and administrator in every school building at every grade level should have access to a fully staffed library throughout the school day.

The following minimum school library staffing requirements define an effective school library program structured to transform teaching and learning throughout the school community:

1. The library program is serviced by one or more certified school librarians working full-time in the school library.

2. The specific number of additional school librarians is determined by the school’s instructional programs, services, facilities, size, and number of students and teachers.

3. In addition to library-degreed professionals, highly trained technical and clerical support staff are necessary for all library programs at every grade level. Each school should employ at least one full-time technical assistant or clerk for each school librarian. Some programs, facilities, and levels of service will require more than one support staff member for each professional.

4. The school district is served by a district library supervisor who provides leadership and support for the building-level school library programs by providing resources, professional development, and leadership in developing and implementing the district’s school library program. The district library supervisor is a member of the administrative team and helps determine the criteria and policies for the district’s curriculum and instructional programs. The district library supervisor communicates the mission, strategic plan, goals, and needs of the school and district library programs to the superintendent, board of education, other district-level personnel, and the community.

BACKGROUND:
The staffing of school libraries will be guided by the language for effective school library programs in the Every Student Succeeds Act (ESSA). A certified school librarian is essential to an effective school library program, yet only two-thirds of school libraries are staffed with certified school librarians (Davis 2010).

DEFINITIONS:
• Effective School Library Program: Definition of an Effective School Library Position Statement

REFERENCES:

**RECOMMENDED READING LIST:**


**DISCLAIMER:**

The position taken by the American Association of School Librarians (AASL) represents the organization and cannot be applied to individual members or groups affiliated with the association without their direct confirmation.

**APPROVAL/REVISION DATES:** June 25, 2016
Instructional Role of the School Librarian

POSITION:
The American Association of School Librarians (AASL) supports the position that school librarians are instructors as well as collaborators with fellow educators in the pursuit of student learning in school libraries, classrooms, learning commons, makerspaces, labs, and virtual learning spaces. School librarian instruction results in students who read and utilize print and digital resources for curricular and personalized learning needs. School librarians teach students how to be inquiring learners who evaluate and use both print and digital information efficiently, effectively, and ethically, with the goal of developing lifelong learning and literacy skills (AASL 2007). School librarians lead the way in digital learning and literacies by teaching and providing professional development in their school communities and districts.

The role of the school librarian is to guide students and fellow educators through the intersection of formal and informal learning. The instruction the school librarian offers is integral to a well-rounded education. As educators and instructional partners school librarians are critical to teaching and learning in the school community. The school librarian plays a prominent role in instructing students, faculty, and administrators in a range of literacies, including information, digital, print, visual, and textual literacies. As leaders in literacy and technology, school librarians are perfectly positioned to instruct every student in the school community through both traditional and blended learning.

BACKGROUND:
In the ever-changing information and education landscape, the instructional role of school librarians is vitally important for staff and students. As print and digital literacies, inquiry, and reading motivation have become crucial elements of teaching and learning, school librarians as educators and information specialists play a key instructional role in successful schools.

DEFINITIONS:
- **Digital Learning**: Learning materials and resources displayed on a digital device and shared electronically with other users. Digital learning content can be both open and/or commercial content (U.S. Dept. of Education 2016).
- **Digital Literacy**: The ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills (ALA 2013).
- **Information Literacy**: A set of abilities requiring individuals to recognize when information is needed and have the ability to locate, evaluate, and use effectively the needed information (ACRL 2000).

REFERENCES:


**RECOMMENDED READING LIST:**


**DISCLAIMER:**

The position taken by the American Association of School Librarians (AASL) represents the organization and cannot be applied to individual members or groups affiliated with the association without their direct confirmation.

**APPROVAL/REVISION DATES:** June 25, 2016
Role of the School Library Program

POSITION:
The American Association of School Librarians (AASL) supports the position that an effective school library program plays a crucial role in preparing students for informed living in an information-rich society. The school library program provides learning opportunities that enable students to become efficient, effective, and creative users of information. Further, the school library program encourages students to examine the authority of authors and the bias of sponsors; to assess the importance of currency of information to the topic at hand; to determine the scope and relevance of information to meet their needs; and to create and share new ideas, resources, products, and information. This instruction occurs best in the context of the school curriculum where students are guided by a standard of excellence set by their classroom teachers in collaboration with the school librarian.

The school library program is not confined by the school library walls, but rather, with the use of technology and online resources, connects to the community and branches throughout the entire school. The school library program provides the mechanism for students to access the resources they need 24/7, whether in the library, in the classroom, or in the student’s home.

Beyond its curricular role, the effective school library program gives each individual member of the learning community a venue for exploring questions that arise out of personalized learning, individual curiosity, and personal interest. As part of the school library program, the school librarian provides leadership and instruction to both students and staff on how to use information technologies constructively, ethically, and safely. The school librarian offers expertise in accessing and evaluating information and collections of quality physical and virtual resources. In addition, the school librarian possesses dispositions that encourage broad and deep exploration of ideas and responsible use of information technologies. These attributes add value to the school community.

School library programs also provide opportunities for learners to read for enjoyment. School librarians’ skills in the selection and evaluation of resources are critical in providing students, staff, and families with open, non-restricted access to a high-quality collection of reading materials that reflect personal interests and academic needs in multiple formats. School librarians take a leadership role in organizing and promoting literacy projects and events that encourage students to become lifelong learners and readers.

The school library program is based on long-range goals developed through strategic planning that reflect the mission of the school. The school librarian participates fully in all aspects of the school’s instructional program, including federally mandated programs and reform efforts. The school library program provides flexible and equitable access to collections, technology, and a state-certified school librarian for all students and staff, physically as well as virtually. The collection includes materials that meet the needs of all learners, represents various points of view on current and historical issues, and offers a wide variety of interest areas. Policies, procedures, and guidelines are developed to maintain the effective school library program. The school library staff and budget are sufficient to support the school’s instructional program and meet the needs of the school library program’s goals.

For students, the school library represents one of America’s most cherished freedoms: the freedom to speak and hear what others have to say. Students have the right to choose what they will read, view, or hear and are expected to develop the ability to think clearly, critically, and creatively about their choices, rather than allowing others to do this for them.
BACKGROUND:
Citizens of this information world must have the skills and dispositions to access information efficiently and to critically assess the sources they rely upon for decision making, problem solving, and generation of new knowledge. The effective school library program plays a critical role in schools in instructing students on how to access information efficiently and critically assess resources.

DEFINITIONS:
- **Effective School Library Program**: Definition of Effective School Library Position Statement
- **Learning Community**: A group of people (can include students) who share common academic goals and attitudes who meet regularly to share expertise and work collaboratively to improve instruction and the academic performance of students.
- **Information Technologies**: Modern information, computer, and communication technology products, services, or tools, including the Internet, computer devices and other hardware, software applications, data systems, personal electronic devices, and other electronic content (including multimedia content) and data storage.
- **School Librarian Instructional Role**: Instructional Role of the School Librarian Position Statement
- **Virtual Resources**: Resources that are not physical in nature, such as computer hardware platforms, operating systems, storage devices, computer network resources, electronic databases, and e-books.

RECOMMENDED READING LIST:


DISCLAIMER:
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APPROVAL/REVISION DATES: June 25, 2016
Preparation of School Librarians

POSITION:
The American Association of School Librarians (AASL) supports the position that, in addition to meeting state certification requirements, school librarians hold a master’s degree or equivalent from a program that combines academic and professional preparation in library and information science, education, and technology. The graduate degree is earned at a college or university whose program is recognized by appropriate bodies such as the American Library Association (ALA), the American Association of School Librarians/Council for the Accreditation of Educator Preparation (CAEP), or state education agencies. The academic program of study includes directed field experience coordinated by a college/university faculty member and takes place in an effective school library program under the direct supervision of a certified, full-time school librarian.

BACKGROUND:
In order to address the critical need for a reading-rich environment in the ever-changing information landscape, the preparation of school librarians is vitally important. As technology has become a crucial element of teaching and learning, school librarians as educators and information specialists play a key role in the success of schools.

DEFINITIONS:
- **Information Technologies:** Modern information, computer, and communication technology products, services, or tools, including the Internet, computer devices, and other hardware, software applications, data systems, and other electronic content (including multimedia content) and data storage.
- **School Librarian Instructional Role:** [Instructional Role of the School Librarian Position Statement](http://www.ala.org/aasl/sites/ala.org.aasl/files/content/aasleducation/schoollibrary/2010_standards_with_rubrics_and_statements_1-31-11.pdf) (accessed May 20, 2016).

REFERENCES:


DISCLAIMER:
The position taken by the American Association of School Librarians (AASL) represents the organization and cannot be applied to individual members or groups affiliated with the association without their direct confirmation.

APPROVAL/REVISION DATES: June 25, 2016
July 26, 2016

Meredith Miller
U.S. Department of Education
400 Maryland Avenue, SW, Room 3C106
Washington, DC 20202-2800

Dear Ms. Miller:

On behalf of the American Library Association (ALA) and the American Association of School Librarians (AASL), thank you for the opportunity to comment on the Department’s proposed regulations governing accountability and State plans under the Elementary and Secondary Education Act (ESEA) as reauthorized by the Every Student Succeeds Act (ESSA).

The mission of ALA, the oldest and largest library association in the world, is “to provide leadership for the development, promotion and improvement of library and information services and the profession of librarianship in order to enhance learning and ensure access to information for all.” The mission of AASL, the ALA division focused on school libraries, is “to empower leaders to transform teaching and learning.” To help accomplish this mission, AASL supports effective school library programs that have a certified school librarian at the helm, provide personalized learning environments, and offer equitable access to resources to ensure a well-rounded education for every student.¹

School libraries are a safe learning environment where all students have equal and equitable access to learning, support, and information for personal and educational purposes. As poverty rates across America remain high, our schools must serve as an “equalizer” to provide all students with equal and equitable access to the resources, support, and instruction necessary to succeed academically and become productive and engaged citizens in a democratic society. Research confirms that effective school library programs are a wise investment for our children’s education and workforce readiness.

ALA has been disheartened by the lack of support for effective school library programs and comprehensive literacy instruction at the Federal, State, and local levels over the years. Data² available from the National Center for Education Statistics (NCES) highlights the lack of support for too many of our students in thousands of schools across the country. NCES data reveals that approximately 8,830 public schools across the nation do not have a school library and for those schools that do have a library, nearly 17,000 schools do not have a full or part-time school librarian on staff.

Accordingly, ALA and AASL were pleased to support the bipartisan conference agreement on ESSA and we are encouraged that the updated law provides opportunities to recognize the key role effective school library programs play in improving student academic achievement and ensuring that students are adequately prepared for college and success in the workforce.

¹ For additional information see AASL definition of “effective school library program.”
² For additional information from NCES, see http://nces.ed.gov/surveys/sass/tables_list.asp#2012.
To help build on these efforts under ESSA, our comments on the proposed regulations focus on consultation requirements under §299.15 and activities to support all students under §299.19.

§299.15 – Consultation and Coordination

Under ESSA, a State may continue to submit a consolidated State plan in lieu of individual, program-specific plans. As part of the consolidated State plan, the proposed regulations would require the State Educational Agency (SEA) to engage in timely and meaningful consultation with stakeholders as part of the design and development of the plan. Specifically, §299.15(a)(6) of the proposed regulations provides that stakeholders consulted during the development of the State plan must include “teachers, principals, other school leaders, paraprofessionals, specialized instructional support personnel, and organizations representing such individuals.”

Under ESSA, the statutory definition of the term “specialized instructional support personnel” includes qualified professional personnel such as school librarians. To help ensure consistency with the statutory provisions under ESSA, we recommend that language under §299.15(a)(6) be clarified to highlight the statutory ability of school librarians to participate in the consultation process with the SEA in the development and implementation of the State consolidated plan.

We believe it is important to specifically highlight school librarians as part of the consultation process because they make the whole school more effective. School librarians serve as instructional leaders, program administrators, teachers, collaborative partners, and information specialists. They work with every student in the school, teaching them to think critically, providing the resources and support they need in school and beyond, and nurturing their creativity. They are also an essential partner for all classroom teachers, providing print and digital materials that meet diverse needs and collaborating to deepen student learning and drive success. Finally, school librarians are leaders in the school, helping to develop curriculum and connecting other educators to current trends and resources for teaching and learning.

§299.19 – Supporting All Students

As part of the consolidated State plan, each SEA must describe its strategies, its rationale for the selected strategies, timelines, and how it will use funds under the programs included in its consolidated State plan to ensure that all children have a significant opportunity to meet challenging State academic standards and graduate with a regular high school diploma. §299.19(a)(1)(iv) of the proposed regulations requires that such strategies and descriptions include “the effective use of technology to improve academic achievement and digital literacy of all students.”

Literacy skills have always been a critical component of our education systems. Today, the attainment of digital literacy – for both students and educators – can help to ensure that all students graduate from high school prepared for postsecondary education or the workforce without the need for remediation.

School libraries are places of opportunity. Effective school library programs play a crucial role in bridging digital and socioeconomic divides. They foster a safe and nurturing climate during the day and before and after school, to serve as critical learning hubs for instruction and use of technology, digital, and print materials (including curation of openly licensed educational resources) to better prepare students for success for school and the workforce:
• **Avery County High School** – In Avery County High School (Newland, NC), the school librarian trains students and teachers on how to become a responsible consumer of information. The school library provides instruction on how to document resources; the importance of following copyright laws; safe use of online resources, including potential dangers of online sharing; and an awareness of the digital footprint all online users leave.

• **Weddington Hills Elementary School** – At Weddington Hills Elementary School (Concord, NC), digital literacy instruction is provided through the school library program. Students in kindergarten and first grades are learning skills such as keyboard recognition, how to access PowerPoint, how to obtain digital images following copyright requirements, and the importance of citing sources. Students in second and third grades are using various technologies to research, collect information, synthesize, and create new products, including a focus on academic honesty and copyright issues. By fourth and fifth grades, students are exploring digital tools for collaboration, multi-media presentations, analysis of data, and interaction with people and events beyond their own communities.

• **Centerville Elementary School** – From kindergarten up students are exposed to digital learning platforms and computers at Centerville Elementary School (Frederick, MD). From lessons on internet safety to proper citation of web sources to their digital footprints and cyberbullying, the students are receiving weekly lessons to help make them true 21st century learners.

• **Mooresville Intermediate School** – At Mooresville Intermediate School (Mooresville, NC), students receive digital literacy training in the school library related to accessing information sources, taking notes appropriately, citing sources, finding copyright-friendly images for projects, and using digital tools to share their learning in new, innovative ways.

To better encourage the effective use of technology to improve academic achievement and digital literacy in ways that support all students, we recommend that §299.19(a)(1)(iv) be clarified to highlight the critical support school libraries provide with regard to improving the digital literacy of all students.

An effective school library program plays a crucial role in bridging digital and socioeconomic divides and focuses on accessing and evaluating information, providing digital learning training and experiences, and developing a culture of reading. The school library program uses a variety of engaging and relevant resources. Robust school libraries have high-quality, openly licensed digital and print resources, technology tools, and broadband access. This environment is essential to providing equitable learning opportunities for all students.

By providing access to an array of well-managed resources, school libraries enable academic knowledge to be linked to deeper, personalized learning. The expanded learning environment of the school library ensures the unique interests and needs of individual students are met. In this way, effective school library programs prepare students for college, career, and community.

Therefore, as the Department considers recommendations on the proposed regulations governing accountability and State plans under ESSA, we respectfully ask that the final regulations specifically include school librarians and school libraries under §299.15.
(Consultation and Coordination) and §299.19 (Supporting All Students) to ensure that implementation of ESSA includes adequate consultation and an appropriate focus on the role of school libraries in using technology to improve academic achievement and digital literacy of all students.

Thank you again for the opportunity to provide recommendations; please do not hesitate to contact Emily Sheketoff from ALA at (202) 628-8410 or Sylvia Knight Norton from AASL at (312) 280-4388 if you have any questions or if there is anything we can do to assist with implementation of ESSA.

Sincerely,

Emily Sheketoff
Executive Director
Washington Office
American Library Association

Sylvia K. Norton
Executive Director
American Association of School Librarians
American Library Association
P.L. 114-95, The Every Student Succeeds Act (ESSA)

*Student Support and Academic Enrichment Grants (ESSA Block Grant)*

**SUMMARY OF PROGRAM**

**Overview** – ESSA authorizes a new flexible block grant program – Student Support and Academic Enrichment Grants under Title IV, Part A, Subpart 1 – to increase the capacity of States, LEAs, schools, and local communities to:

1. Provide all students with access to a well-rounded education;
2. Support safe and healthy students; and
3. Support the effective use of technology.

**Authorization Level and Funding** – ESSA authorizes the program at $1.65 billion for FY2017 through FY2020.

- The Administration’s FY2017 budget request included $500 million for Student Support and Academic Enrichment Grants.

- Prior to the August 2016 recess, the Senate Appropriations Committee provided $300 million and the House Appropriations Committee provided $1 billion in their respective bills for Student Support and Academic Enrichment Grants.

- The funding level will be finalized as part of negotiations to fund the Federal government for FY2017.

**Allocation of Funds by Formula** – Each State, and subsequently each LEA, receives an allocation based on their State or local share of the ESSA Title I funding formula.

- States reserve 5 percent of their allocation for State-level activities and 95 percent of funds are provided for local awards to LEAs.

- Each LEA that receives a formula allocation must conduct a “needs assessment” and then must use:
  - Not less than 20 percent of funds to support well-rounded educational opportunities;
  - Not less than 20 percent of funds to support safe and healthy students; and
  - A portion of funds (not defined under ESSA) to support the effective use of technology.

- Remaining funds at the local level can be used by the LEA to support any of the three aforementioned categories of activities.

**State-Level Activities** – States are authorized to use their share of funding (5 percent) for State-level activities and programming designed to meet the purposes of the program, including:
• Monitoring, training, technical assistance and capacity building for LEAs;

• Identifying and eliminating State barriers to the coordination and integration of programs, initiatives, and funding streams so that LEAs can better coordinate with other agencies, schools, and community-based services and programs; and

• Supporting LEAs in providing programs and activities that:
  
  o Offer well-rounded educational experiences to all students, which may include:
    
    ✓ STEM courses;
    ✓ Music and arts education;
    ✓ Foreign languages;
    ✓ Accelerated learning programs that provide postsecondary level courses accepted for credit at institutions of higher education (such as Advanced Placement courses);
    ✓ American history, civics, economics, geography, social studies, or government education;
    ✓ Environmental education; and
    ✓ Other courses, activities, programs or experiences that contribute to a well-rounded education.

  o Foster safe, healthy, supportive, and drug-free environments, which may include:
    
    ✓ Reducing exclusionary discipline practices in schools;
    ✓ Mental health awareness training and school-based counseling;
    ✓ Integrating health and safety practices into school and athletic programs; and
    ✓ Disseminating best practices and evaluating program outcomes to promote student safety and violence prevention.

  o Increase access to personalized, rigorous learning experiences supported by technology, including:
    
    ✓ Providing technical assistance to LEAs to identify and address technology readiness needs, which specifically includes “access to school libraries”;
    ✓ Supporting schools in rural and remote areas to expand access to digital learning opportunities;
    ✓ Supporting the delivery specialized or rigorous academic courses and curricula through the use of technology, including digital learning technologies and assistive technology.
    ✓ Disseminating promising practices related to technology instruction, data security and the acquisition and implementation of technology tools and applications;
    ✓ Providing teachers, paraprofessionals, school librarians and media personnel, specialized instructional support personnel, and administrators with the knowledge and skills to use technology effectively; and

 1 Under ESSA, the term “digital learning” is defined as any instructional practice that effectively uses technology to strengthen a student’s learning experience and encompasses a wide spectrum of tools and practices, including: (1) interactive learning resources, digital learning content (which may include openly licensed content), software, or simulations, that engage students in academic content; (2) access to online databases and other primary source documents; (3) the use of data and information to personalize learning and provide targeted supplementary instruction; (4) online and computer-based assessments; (5) learning environments that allow for rich collaboration and communication, which may include student collaboration with content experts and peers; (6) hybrid or blended learning, which occurs under direct instructor supervision at a school or other location away from home and, at least in part, through online delivery of instruction with some element of student control over time, place, path, or pace; and (7) access to online course opportunities for students in rural or remote areas.
Making instructional content widely available through open educational resources, which may include providing tools and processes to support LEAs in making such resources widely available.

**Local Consultation** – In developing the local application, an LEA is required to consult with parents, teachers, principals, specialized instructional support personnel (which specifically includes school librarians under ESSA) and other stakeholders with relevant and demonstrated expertise in programs and activities designed to meet the purpose of the program.

- In addition, LEAs are required to engage in “continued consultation” with such stakeholders to improve local activities and to coordinate programming with other related strategies, programs, and activities being conducted in the community.

**Local Needs Assessment** – Prior to receiving funds under the program, LEAs must conduct a “comprehensive needs assessment” (that must be conducted every 3 years) to examine needs for improvement of:

- Access to, and opportunities for, a well-rounded education for all students;

- School conditions for student learning in order to create a healthy and safe school environment; and

- Access to personalized learning experiences supported by technology and professional development for the effective use of data and technology.

  - **Note**: Under State Activities, States are authorized to support local efforts to increase access to personalized learning experiences by providing technical assistance to LEAs to identify and address technology readiness needs, which specifically includes “access to school libraries” under the statute.

- LEAs that would receive an allocation of less than $30,000 are not required to conduct a comprehensive needs assessment.

**Local Uses of Funds** – As part of the local application, LEAs must provide assurances that funds will prioritized to schools that have the greatest need, the most low-income children, are identified under the accountability system or identified as persistently dangerous. Similar to activities authorized at the State-level, LEAs are authorized to use their share of funds (95 percent) to:

- Develop and implement programs and activities that support access to a well-rounded education and that:

  - Are coordinated with other schools and community-based services and programs;

  - May be conducted through partnerships; and

  - May include programs and activities, such as:
    - College and career guidance and counseling;
    - Activities that use music and the arts as tools to support student success;
    - Activities to improve instruction and student engagement in STEM (including computer science);
    - Efforts to raise student academic achievement through accelerated learning programs
Activities to promote traditional American history, civics, economics, geography, or government education;
Foreign language instruction;
Environmental education;
Activities that promote volunteerism and community involvement;
Activities that support educational programs that integrate multiple disciplines, such as programs that combine arts and mathematics; or
Other activities and programs to support student access to, and success in, a variety of well-rounded education experiences.

Support safe and healthy students through the development, implementation and evaluation of programs and activities that:

- Are coordinated with other schools and community-based services and programs;
- Foster safe, healthy, supportive, and drug-free environments that support student academic achievement;
- Promote the involvement of parents;
- May be conducted through partnerships; and
- May include programs and activities, such as:
  - Drug and violence prevention activities;
  - School-based mental health services;
  - Health and safety practices for schools and athletic programs;
  - Support for healthy, active lifestyles, including nutritional education and regular, structured physical education activities;
  - Prevention of bullying and harassment;
  - Mentoring and counseling for all students;
  - Dropout recovery programs;
  - Training for school personnel related to suicide prevention, crisis management, conflict resolution and school-based violence prevention strategies;
  - Child sexual abuse awareness;
  - Reducing exclusionary discipline practices; and
  - Pay for success initiatives.

Use technology to improve the academic achievement, academic growth, and digital literacy of all students – including by addressing shortfalls identified in the local needs assessment conducted prior to receiving funds – which may include:

- Providing educators, school leaders, and administrators with the professional learning tools, devices, content, and resources to personalize learning and to administer computer-based assessments and blended learning strategies;

2 Under ESSA, the term “blended learning” is defined as a formal education program that leverages both technology-based and face-to-face instructional approaches that include an element of online or digital learning, combined with supervised learning time, and student-led learning, in which the elements are connected to provide an integrated learning experience; and in which students are provided some control over time, path, or pace.
Building technological capacity and infrastructure, including procuring content and purchasing devices, equipment, and software applications in order to address readiness shortfalls (as identified under the comprehensive needs assessment);

✓ Note: There is a 15 percent cap under ESSA related to the purchase of technology infrastructure under the program.

Developing or using effective strategies for the delivery of specialized or rigorous academic courses through the use of technology, including digital learning technologies and assistive technology;

Blended learning projects;

Professional development in the use of technology (which may be provided through partnerships with outside organizations) to enable teachers and instructional leaders to increase student achievement in STEM (including computer science); and

Opportunities for students in rural, remote, and underserved areas to take advantage of high-quality digital learning experiences, digital resources, and access to online courses taught by effective educators.

SUMMARY OF LIBRARY PROVISIONS

- ESSA authorizes (but does not require) States to use their share of funds to assist LEAs in providing programs and activities that increase access to personalized, rigorous learning experiences supported by technology, including adequate “access to school libraries.”

- ESSA authorizes (but does not require) States to use their share of funds to assist LEAs in providing school librarians and other school personnel with the knowledge and skills to use technology effectively, including effective integration of technology, to improve instruction and student achievement.

- In developing their local applications, LEAs must consult with teachers, principals and other stakeholders, including “specialized instructional support personnel” which is defined under ESSA as specifically including school librarians.

- ESSA requires that LEAs conduct a “needs assessment” prior to receiving funds from the State (that must be conducted every 3 years). The needs assessment must include access to personalized learning experiences (which may include access to school libraries).

NEXT STEPS – ADVOCATE FOR INCLUSION OF LIBRARY PROGRAMMING

State-Level Advocacy

- Because States are authorized (but not required) to support LEAs in providing programs and activities that increase access to personalized learning experiences (which may include and professional development for school librarians and better access to school libraries for students), it will be important to contact and work with education officials at the State-level (State Educational Agency) to make them aware of their ability to use funds in support of personalized learning experiences, including ways in which effective school library programs can contribute to personalized learning activities in schools.
• Since States are authorized (but not required) to support LEAs in the delivery of specialized or rigorous academic courses and curricula through the use of technology, including digital learning technologies, it will be important to contact and work with State education officials to ensure that such activities include effective school library programs that provide digital learning technologies.

Local Advocacy

• Since LEAs are required to consult with stakeholders – which may include school librarians – on the development of their local activities, it is critical to contact and work with leaders, administrators and technology educators at the school and LEA level to ensure that school librarians can adequately participate in the development and implementation of programming.

• Since LEAs must conduct a “comprehensive needs assessment” that includes access to personalized learning experiences supported by technology and professional development for the effective use of data and technology, it is essential to contact and work with leaders, administrators and technology educators at the school and LEA level to ensure that “access to school libraries” is considered as part of the local needs assessment.

• Since LEAs are authorized (but not required) to support the delivery of specialized or rigorous academic courses and curricula through the use of technology, including digital learning technologies, it will be important to contact and work with leaders, administrators and technology educators at the school and LEA level to ensure that such activities include effective school library programs that provide digital learning technologies.