Connecting ESSA to School Libraries

Wednesday, October 12, 2016

Utah Educational Library Media Association (UELMA)
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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## Schedule

### October 12, 2016

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<th>Presenter</th>
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<tr>
<td>12:30 pm</td>
<td>Welcome Remarks</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>12:30 – 1:00 am</td>
<td>ESSA Overview</td>
<td>Emily Sheketoff, Executive Director of Washington Office of American Library Association</td>
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<tr>
<td></td>
<td>- Federal and State Timeline</td>
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<td></td>
<td>- Effective School Library Program Definition</td>
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<td></td>
<td>- Review of titles that include School Librarians</td>
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<td></td>
<td>- Connection of titles to school library role</td>
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<tr>
<td>1:00-1:30 pm</td>
<td>Update from Utah Board of Education</td>
<td>Garret Rose, Utah State Board of Education, Secondary Language Arts Specialist</td>
</tr>
<tr>
<td>1:30 - 1:45 pm</td>
<td>• Review of Key Messages</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<td></td>
<td>• Identifying Stakeholders</td>
<td></td>
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<tr>
<td>1:45-2:00 pm</td>
<td>Coalition Development Plan</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>2:00-2:15 pm</td>
<td>Report/Share Out</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>2:15 – 2:30 pm</td>
<td>Connecting message to stakeholders</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>2:30-2:45 pm</td>
<td>Report/Share Out</td>
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<tr>
<td>2:45-3:00 pm</td>
<td>Elevator Speech Development</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>3:00-3:15 pm</td>
<td>Connecting ESSA to Practice</td>
<td>Wendy Stephens, AASL Board of Directors</td>
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<tr>
<td>3:15-3:30 pm</td>
<td>Elevator Speech Practice and Feedback</td>
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<tr>
<td>3:30 pm</td>
<td>Closing Remarks/Questions</td>
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CONNECTING ESSA TO SCHOOL LIBRARIES
Wednesday, October 12, 2016
Utah Educational Library Media Association(UELMA)

Welcome

Wendy Stephens,
AASL Board of Directors, Region 5 Director

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
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.
Connecting the Dots

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

IAL

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

Utah ESSA Update

Utah State Board of Education ESSA Page:
http://schoolboard.utah.gov/tag/essa

Included in handbook:
• Submitted Comments (8/1/16)

Utah ESSA Updates

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<thead>
<tr>
<th>Workgroup</th>
<th>Utah Contact</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accountability System</td>
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Identifying Stakeholders

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
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

Example

Local public library
- Summer reading programs
- Marketing regarding access to information and technology for community
- Library as an essential part of learning
- School libraries
- Personalized, rigorous learning experiences
- Library research
- Academic achievement
- School libraries

Key Message Development:

- School librarians are teachers, specialized instructional support staff, trained to teach library skills early and develop lifelong library users and supporters.
- The public library is an invaluable asset to students as they continue their work outside of school but gathering staff and funded school libraries connects student personalized, rigorous learning experience, and library research to academic achievement.
- Digital literacy skills are essential for success as students move into the work force that requires the effective use of technology and while there is a direct impact for parents to support a strong school library program there is tremendous value for the business and community too.
ESSA Elevator Speech

[Image: https://vimeo.com/183395638]

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

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.

Conversation Response: Yes, the internet has certainly put information at your fingertips but do you believe everything you read on the internet? Students today have a hard time navigating such a vast amount of information and learning digital literacy skills is critical to their success in school and after when they navigate college or start a career.
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

Questions
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

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<tbody>
<tr>
<td>December 10, 2015</td>
<td>President Obama signs the Every Student Succeeds Act (ESSA) into law</td>
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<tr>
<td>December 22, 2015</td>
<td>U.S. Department of Education (ED) publishes request for information (RFI) re: regulations on Title I of ESSA</td>
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<tr>
<td>March 21 – April 19, 2016</td>
<td>ED holds three sessions of negotiated rulemaking (neg-reg) on assessment and supplement, not supplant (SNS) issues</td>
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<tr>
<td>April 27, 2016</td>
<td>ED releases assessment regulations that were agreed to by the neg-reg committee</td>
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<tr>
<td>May 31, 2016</td>
<td>ED releases a notice of proposed rulemaking (NPRM) on accountability and state plan issues under Title I</td>
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<tr>
<td>August 1, 2016</td>
<td>(1) ESEA waivers are null and void, per the statute, and (2) comments are due on the NPRM re: accountability and state plan issues</td>
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<tr>
<td>October 1, 2016</td>
<td>Effective date for competitive programs under ESSA, unless otherwise provided for in the statute</td>
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<tr>
<td>October/November, 2016</td>
<td>Final regulations published by ED</td>
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<tr>
<td>February/April, 2017</td>
<td>States submit plans for School Year 2017-2018</td>
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<tr>
<td>May/June, 2017</td>
<td>ED begins peer review and approves state plans</td>
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<tr>
<td>July 1, 2017</td>
<td>Effective date for formula grant programs under ESSA</td>
</tr>
<tr>
<td>August, 2017</td>
<td>New state plans take effect in schools at the start of the 2017-2018 school year</td>
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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:
  - The importance of developing and maintaining effective school library programs; and
  - 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.

  o 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.
August 1, 2016

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

Docket ID: ED-2016-OESE-0032

To Whom It May Concern:

I am writing to provide comments in behalf of the Utah State Board of Education (USBE) on the Department of Education’s (ED) Notice of Proposed Regulations on accountability and state plans under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA). USBE appreciates the opportunity to provide comment. However, USBE respectfully requests an extension of the public comment period generally.

There are numerous aspects of the proposed regulations that gives Utah the flexibility to create Title I accountability systems, in cooperation with stakeholders, while providing “guardrails” to ensure that the state’s actions are consistent with the objectives and provisions of ESSA. The proposal does not appear to be overly prescriptive in allowing states to identify specific metrics. However, much of what states are required to report and create is categorically prescriptive. While USBE similarly values what the Department has required, in terms of what to measure, USBE feels that each state should be allowed the opportunity to determine the specific indicators for reporting purposes.

While recognizing ED’s efforts to capture the intent of ESSA, there are a number of significant provisions that USBE strongly believes should be revised before the regulations are finalized. USBE requests that ED capture in the revision of the proposed regulations the state’s rights to articulate through state statute, rules and policy the appropriate provisions for equitable education. Specifically, USBE requests ED give serious consideration to the issues described below.

1. **Performance Levels for Indicators, Summative Ratings, Assessment, and Participation**

ESSA requires that states develop accountability systems that meaningfully differentiate between schools. The proposed regulations are too overreaching by requiring specific indicators for summative ratings. The proposed regulations are also too prescriptive in the
methods in which the State, LEAs, and schools are to report the accountability findings. The proposed regulations are overreaching in the assessment requirements and punishments that are not required in ESSA. Under the proposed regulations, USBE would be required to assign a penalty to schools who have less than 95 percent participation even though the law and proposed regulations allow for parental exclusion of statewide assessments. Per the proposed regulations, a school that has less than 95 percent assessment participation for all students or for one or more subgroup will be assigned one of the following:

- A lower summative rating
- Assigned the lowest performance level on the state’s accountability system
- Identify the school for targeted support and improvement

The proposed regulations also require states to provide a single summative score for each school although no mandate exists in the law.

Recommendation:

USBE recommends that the final regulations allow more flexibility in determining specific indicators as well as language that would allow accountability systems to be defined by individual states. State accountability systems would still be required to draw clear distinctions among schools, both on the individual indicators and in the summative rating. The final regulation should be clear that it is at the discretion of the state to use multiple public reporting methods, such as dashboards to display data or a single rating.

ED should omit any language in the proposed regulations regarding participation penalties and allow states to determine how to reconcile the 95% participation requirement and parents’ rights to opt their students out of statewide assessments as written in state law.

ED should allow states to decide whether or not to use a single “score” when publishing accountability results. ED should also allow states to determine whether or not to use “levels” when identifying schools for improvement.

II. Implementation of Accountability Systems

ESSA provides that the revised accountability requirements of Title I “shall take effect beginning with the 2017-2018 school year.” This language seems unclear as it does not specify when states would have to begin identifying new schools for support and improvement. The policy and timeline as currently drafted in the proposed regulations will likely be unrealized in Utah.

The proposed regulation would require USBE to identify schools by the beginning of each school year. The initial identifications would be made before the beginning of the 2017-2018 school year and “data from the 2016-2017 school year would inform identification for the 2017-2018 school year.” However, USBE will need more time to revise our accountability systems, if the proposed regulations remain unchanged, by adding the new indicators of English language
proficiency and of school quality or student success, agreeing on indicator weights, and establishing criteria and procedures for school identification.

USBE needs time to collect the data for school identification, including data for the indicators that might not yet exist. This process will take substantial time, effort, and require legislative or administrative actions in Utah. Schools and districts would, under the proposed timeline, proceed through much of the 2016-2017 school year without having clear, final information on a state’s long-term goals, interim measures, and annual indicators, which will limit our ability to align local programs and strategies with those goals, measures, and strategies that will be used to identify and improve underperforming schools. Simply put, the proposed timeline is unworkable.

Further, ED has proposed that USBE submit a consolidated state plan, which will include descriptions of our accountability system, by March 6 or July 5, 2017. USBE would likely submit a consolidated plan in the second window and will not receive ED’s approval, or request for revision, of the plan until early October. USBE would have to identify schools, including placing some schools into at least a three-year cycle of continuous support and improvement, before knowing whether ED has found our accountability system as meeting the requirements within the law and regulations.

A related concern is the timing for identification of high schools for comprehensive support and improvement and support based on graduation rates. Under ESSA, cohort graduation rates are calculated by including, in the numerator, students who graduate at the conclusion of the school year as well as those who graduate at the end of the summer session that follows the school year. Because of the inclusion of the summer graduates, it will not be possible to calculate graduation rates for 2016-2017 until late September, 2017. This timeline does not allow sufficient leeway to identify schools for improvement.

**Recommendation:**

We recommend that the ED allow states to identify schools prior to the 2018-2019 school year under ESSA’s new accountability system, using data for 2017-2018 and prior years, and continue ongoing efforts under ESEA flexibility or prior law to improve currently identified schools during the 2016-2017 and 2017-2018 school years. This is consistent with the ESSA statute and will allow for states to implement high-quality accountability systems in 2017-2018 and use these systems to identify underperforming schools. With respect to the graduation-rate issue, it would be appropriate to allow states to use data from one year earlier (e.g., use 2016-2017, averaged at state option with data from one or two or three previous years, to identify schools for 2018-2019).

**III. High School Graduation Rates**

ESSA requires that USBE identify, for comprehensive support and improvement, any public high school that fails to graduate one-third or more of its students. While the law does not specify a
particular methodology to be used in calculating graduation rates for school identification, the proposed regulations would require that all states use the four-year adjusted cohort rate.

This proposed requirement would disproportionately impact high schools set up specifically to enroll student populations including recently arrived immigrants, adjudicated youth, returning dropouts, and other groups who, by their nature, need additional time to finish school. This proposal affects schools that enroll significant numbers of students who are “under-credited” when they begin high school. This also negatively counts students with disabilities who stay in the educational system longer, per IEP determinations, in many cases until the student reaches the age of twenty-two. Under the proposal, all of these schools would likely fall into comprehensive improvement status, not because of their educational performance but because of the student populations they serve. This may also compromise the validity of graduation results of those schools who may be on the borderline of school improvement by not reaching the two-thirds graduation rate according to the proposed timeline.

ED recognized the need for flexibility in this area when, under the 2008 Title I regulations, it allowed states to use both the four-year adjusted cohort rate and an extended-year adjusted cohort rate in their accountability systems. The Congress implicitly endorsed that decision in ESSA by permitting states to use both rates in their long-term goals, measures of interim measures of progress, and annual indicators.

Recommendation:

We strongly recommend that states be allowed to use both the four-year adjusted cohort rate and an extended-year adjusted cohort rate in our identification of Schools for Comprehensive Support and Improvement. States should also be allowed to determine the accountability measures for alternative high schools.

IV. School Improvement

ESSA requires that states utilize the Title I reservation for school improvement to provide funding to eligible LEAs and ensure that “allotments are of sufficient size to enable a local educational agency to effectively implement selected strategies.” The proposed regulation would define these allotments as at least $500,000 for Comprehensive Support and Improvement schools and $50,000 for Targeted Support and Improvement schools, unless an LEA agrees to accept less funding. In Utah, this will result in awards that will likely exceed the capacity of schools to spend funds wisely and will limit our ability to distribute the funds according to need and ESSA’s statutory provisions.

The proposed regulations are unclear on how to allocate certain costs, such as those for administration, transportation, maintenance of plant, and others at a school level. USBE recommends that the Department of Education make explicit that states will determine how these types of LEA-wide costs will be allocated to schools.
It is also unclear in the proposed regulations how separating expenditures between federal funds and state and local funds allow for allocations of expenditures to be based on total revenues in a certain program. For example, in the case of food service program expenditures, there are federal funding sources and state funding sources that are utilized. It is unclear whether LEAs or the state may allocate expenditures to each funding source based on the percentage of revenue in the program each year.

The denominator found in §200.35 states the following: Aggregate number of students in elementary and secondary schools to whom the State and LEA provide free public education on October 1. The proposed regulations are unclear if this also incorporates Pre-K students.

The proposed rule §200.35 also requires the reporting of current expenditures per pupil from Federal, State and local funds, for the preceding fiscal year by December 31, both in total (i.e. Federal, State and local funds) and Disaggregated by:

- Federal Funds
- State and local funds (including Title VII (Impact Aid) funds), which must not include funds received from private sources.

Please provide more definition related to private sources. Please provide additional definition related to local sources. Do local sources include items such as rents/royalties, fees collected, etc.? Also, please define whether or not Medicaid reimbursements are considered a Federal, State or Local revenue since they are a reimbursement.

The proposed rule §200.35 also states that each LEA report card must include the following:

1. Current expenditures per pupil from Federal, State and local funds for the preceding fiscal year, consistent with the timeline, in 200.31 (e), for the LEA and each school served by the LEA-
   a. In the aggregate (Federal, State, and local funds); and
   b. Disaggregated by source of funds, including –
      i. Federal funds (excluding Impact Aid Funds), and
      ii. State and local funds combined (including Impact Aid Funds), which must not include funds received from private sources

Section (c) of this proposed rule further requires a State to develop a single statewide procedure to calculate LEA current expenditures per pupil and a single statewide procedure to calculate school-level current expenditures per pupil.

2. Each LEA report card must also separately include the amount of current expenditures per pupil that were not allocated to public schools in the LEA.
Recommendation:

USBE recommends that ED remove provisions related to minimum dollar amounts for school improvement awards and allow states to determine the financial needs of identified schools to implement necessary interventions and the appropriate distribution of funding between identified schools within the state.

A uniform standard for costs should not be defined by the proposed regulations (§200.35.) States should be allowed to define those uniform standards that are equitable.

V. Consolidated State Plan

The statute clearly specifies that, in establishing requirements for the consolidated state plan, the Secretary may “require only descriptions, information, assurances..., and other information that are absolutely necessary for the consideration of the consolidated application” (emphasis added). This language has been in the statute since the consolidated plan authority was created as part of the 1994 ESEA reauthorization.

In the proposed ESSA regulations ED has proposed adding numerous, burdensome requirements that are not found in the statute and has potentially ignored statutory language calling for the plan to include only what is absolutely necessary. Some examples of this are:

- Under proposed Section 299.14(c), USBE would be required to describe its performance management system for “each component required” under Sections 299.16 through 299.19. Each of these descriptions must include six discrete elements. Because sections 299.16 through 299.19 include some 40 different components (individual requirements), it appears that USBE would have to include 240 separate descriptions of our performance management systems, as well as additional performance information required under Sections 299.17(e) and 299.19(b). None of these descriptions is required under the statute.

- While the law requires USBE to describe how low-income and minority children in Title I schools are not served at disproportionate rates by ineffective, out-of-field, and inexperienced teachers, and to describe how we will report on and evaluate our progress in this area, the proposed regulations would go well beyond the statutory language, calling for new definitions and reporting timelines that are different from those included in the proposed annual report card requirements. Another aspect of the proposed regulations that goes beyond the statutory language includes the requirement to conduct “root cause analyses” of the disproportionality.

- Under section 299.19(a)(ii), the SEA’s description of how it will support a well-rounded and supportive education for all students would be required to include the state’s strategies (and the rationales for those strategies), timelines, and funding sources for providing equitable access to rigorous courses in 17 separate subject areas, as well as in
other subjects in which female students, minority students, English learners, children with disabilities, and low-income students are underrepresented. There is no statutory requirement for this description of this plan in general, and much less so for a requirement to provide four types of information on at least 17 subjects.

- Under proposed section 299.19(a)(3), the plan would be required to include a review, on an LEA-by-LEA basis, of districts’ budgeting and resource allocations in four separate areas. There is no requirement to include a review in the statute.

USBE would rather submit a true consolidated plan; one that includes the elements previously required, but not one that is more time-consuming and burdensome, than to submit each of the individual program plans.

**Recommendation:**

USBE recommends that ED take an approach consistent with the 1994 and 2002 reauthorizations: allowing states to submit streamlined plans that capture essential elements of a consolidated plan, without adding planning requirements that go beyond what is called for in the statute.

**VI. Summary**

Thank you for the opportunity to provide some of USBE’s views on the proposed regulations. While we appreciate the Department of Education’s approach to securing the intent of ESSA, we feel that ED has interjected greater limitations upon states that are not explicitly found in ESSA. USBE suggests that states have the greatest amount of latitude allowable in ESSA to determine the best course of action to secure an equitable and quality education for Utah’s students and that ED explicitly articulates that latitude in the regulations.

Sincerely,

David L. Crandall, Chair
Utah State Board of Education

Sydnee Dickson, Ed.D.
State Superintendent of Public Instruction
“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.
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?

<table>
<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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Message Development

You've determined who your audience is (refer back to Coalition Development Plan), and you have key message points from ESSA related to school library funding (refer back to Key ESSA Message Points), but do not assume that communicating the key messages verbatim to your potential coalition partners will yield results. You must transform the message into a language that will appeal to your potential coalition members.

While you need to adjust messaging to fit the audience there are still key words that you do not want to remove- bolded below. It is important that when anyone is talking about ESSA, even if they are not directly referencing school library program, they are connecting these words to the school library.

- **Specialized instructional support staff.** ESSA specifically includes school librarians in the definition of specialized instructional support staff.
- School library programs support the development of digital literacy skills and academic achievement.
- Title IV Student Support and Academic Enrichment Grant (Block Grants), allocated based on Title I eligibility, authorizes states to use funds to assist school districts in providing programs and activities that increase access to personalized, rigorous learning experiences support by technology, including adequate access to school libraries.
  - Block Grants also authorize 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.
- Reference the “Ask Me How School Librarians Ensure Student Success” message cards
  - Title I – School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.
  - Title II, Part A – 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, Subpart 1 – 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 - School Librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.
### Message Development Example

Take one row in your Coalition Development chart and create a key message for middle three blocks, incorporating the message points and key words. Example:

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<td>Local public library</td>
<td>Summer reading programs, marketing regarding access to information and technology for community</td>
<td>School libraries create knowledgeable library users; school libraries fill a specific role in connection to curriculum and without would create a gap between services</td>
<td>General public awareness; engaging non-parents, but library friends in efforts</td>
<td>1. Meet with staff to provide information. 2. Ask to hold an information session at public library for general public 3. Ask to present to their friends group and in return offer time with school parents group</td>
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</table>

**Key Message Development:**

- School librarians are teachers, **specialized instructional support staff**, trained to teach library skills early and develop lifelong library users and supporters.

- The public library is an incredible asset to students as they continue their work outside of school but a fully staff and funded school library connects student **personalized, rigorous learning experience**, and library research, to **academic achievement**.

- **Digital literacy skills** are essential for success as students move into the work force that requires the **effective use of technology** and while there is a direct impact for parents to support a strong school library program there is tremendous value for the business and community too.
**Message Development Worksheets**

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Key Message Development:

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Key Message Development:

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Elevator Speech Development

You’ve found yourself faced with the questions, “Are there really any libraries left? “ and “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 Language</th>
<th>School Library Talking Point</th>
<th>Answer To Questions</th>
<th>How This Is Seen In Your Library</th>
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<td>Title I: Improving basic programs operated by state and local educational agencies</td>
<td>School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.</td>
<td>(Example) School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture. Students today have a hard time navigating such a vast amount of information, and learning digital literacy skills is critical to their success in school and after when they navigate college or start a career.</td>
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<td>School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.</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:**

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**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:


   www.ala.org/aasl/advocacy/legislation/essa.


   www.ala.org/aasl/sites/alao.aasl/files/content/aaslpubsandjournals/slr/vol15/SLR_School_Librarians_as_Technology_Integration_Leaders_V15.pdf.


DISCLAIMER:

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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](https://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:
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APPROVAL/REVISION DATES: June 25, 2016
ALA

American Library Association

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
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

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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:
  o Are coordinated with other schools and community-based services and programs;
  o Foster safe, healthy, supportive, and drug-free environments that support student academic achievement;
  o Promote the involvement of parents;
  o May be conducted through partnerships; and
  o 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:
  o 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;

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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.