Connecting ESSA to School Libraries

Tuesday, November 1, 2016

Oklahoma School Librarians

(OKSL)
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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<td>Welcome Remarks</td>
<td>Kathryn Lewis, AASL Board of Directors, Region 6</td>
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<td>9:00 – 9:30 am</td>
<td>ESSA Overview</td>
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<td>- Federal and State Timeline</td>
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<td>- Effective School Library Program Definition</td>
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<td>- Review of titles that include School Librarians</td>
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<td>- Connection of titles to school library role</td>
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<tr>
<td>9:30-10:00 am</td>
<td>Review of Oklahoma State Department of Education</td>
<td>Timmie Spangler, Director Instructional Materials &amp; Library, Oklahoma State Department of Education</td>
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<td>10:00 -10:15 am</td>
<td>Review of Key Messages</td>
<td>Kathryn Lewis, AASL Board of Directors, Region 6</td>
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<td>Coalition Development Plan</td>
<td>Kathryn Lewis, AASL Board of Directors, Region 6</td>
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<td>Report/Share Out</td>
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<td>Connecting message to stakeholders</td>
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<td>Elevator Speech Development</td>
<td>Kathryn Lewis, AASL Board of Directors, Region 6</td>
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<td>11:30- 11:45 pm</td>
<td>Connecting ESSA to Practice</td>
<td>Kathryn Lewis, AASL Board of Directors, Region 6</td>
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<td>11:45 am - Noon</td>
<td>Elevator Speech Practice and Feedback</td>
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CONNECTING ESSA TO SCHOOL LIBRARIES

Tuesday, November 1, 2016
Oklahoma School Librarians (OKSL)

Welcome

Kathryn Lewis
AASL Board of Directors,
Region 6

Handbook
SHARE, SHARE, SHARE

Tag @aasl

#ESSAlibraries

Send photos to jhabley@ala.org

ESSA Webpage

http://essa.aasl.org/

ALA Washington Office

https://vimeo.com/183396897

Emily Sheketoff
Executive Director of Washington Office of American Library Association
The American Association of School Librarians (AASL) supports the position that:

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

**Effective School Library Program**

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

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

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

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

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

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

https://vimeo.com/183388920

Title II, Part A

Title II: Supporting effective instruction

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

https://vimeo.com/183390785

LEARN

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

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

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

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

https://vimeo.com/183393334

Title II, Part B

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

https://vimeo.com/183393643

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

Title IV, Part A

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

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

https://vimeo.com/183394913
Oklahoma ESSA Update

OK Department of Education ESSA Page
http://sde.ok.gov/sde/essa

Questions/Comments email:
ESSAfeedback@sde.ok.gov

Included in handbook:
• ESSA Feedback Survey Results
• ESSA OSDE PowerPoint presentation
• Committee of Practitioners Roster
• OSDE Final Comments on Proposed Rulemaking

Feedback/Review Timeline

July/August-16
Collect early feedback for drafting

October-16
Draft 1 of Plan posted for review/comment

November-16
Additional opportunities for feedback

February-17
Draft 2 of Plan posted for review/comment

May-17
Governor's Review

July-17
Submit Plan to USDE
Identifying Stakeholders

• 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
Connecting the dots

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

ESSA Key Messages

- School librarians and access to effective school library programs, impact student achievement, digital literacy skills, and school climate/culture.
- School librarians share their learning with other professionals when they attend conferences and workshops, applying the benefits of new techniques, strategies, and technologies to the entire district.
- School librarians are uniquely suited to lead the effort in applying for competitive grants because of their expertise and access to strong professional learning networks.
- School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.

Key Words/Phrases

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

Meaningful Messaging

Elevator Speech - 4 pieces

1. The message
2. The Story & Key Data
3. The Ask
4. The Elevator Speech
Title I: Improving basic programs operated by state and local educational agencies

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

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

Ask: Include librarians on district-wide school improvement team.

(Audience: District Administrator)

The Elevator Speech:

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

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

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
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<tbody>
<tr>
<td><strong>December 10, 2015</strong></td>
<td>President Obama signs the Every Student Succeeds Act (ESSA) into law</td>
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<td><strong>December 22, 2015</strong></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><strong>March 21 – April 19, 2016</strong></td>
<td>ED holds three sessions of negotiated rulemaking (neg-reg) on assessment and supplement, not supplant (SNS) issues</td>
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<td><strong>April 27, 2016</strong></td>
<td>ED releases assessment regulations that were agreed to by the neg-reg committee</td>
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<tr>
<td><strong>May 31, 2016</strong></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><strong>August 1, 2016</strong></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><strong>October 1, 2016</strong></td>
<td>Effective date for competitive programs under ESSA, unless otherwise provided for in the statute</td>
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<td><strong>October/November, 2016</strong></td>
<td>Final regulations published by ED</td>
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<tr>
<td><strong>February/April, 2017</strong></td>
<td>States submit plans for School Year 2017-2018</td>
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<td><strong>May/June, 2017</strong></td>
<td>ED begins peer review and approves state plans</td>
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<tr>
<td><strong>July 1, 2017</strong></td>
<td>Effective date for formula grant programs under ESSA</td>
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<tr>
<td><strong>August, 2017</strong></td>
<td>New state plans take effect in schools at the start of the 2017-2018 school year</td>
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Conference Agreement to Reauthorize the Elementary and Secondary Education Act

OPPORTUNITIES FOR SCHOOL LIBRARIANS

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

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

Background

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

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

Library Provisions

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

Next Steps

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

- Contact and work with the superintendent’s office in developing the local plan under Title I, Part A to ensure that the school district takes into consideration:
  - 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.

  o 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.

  o 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.

  o 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.
Background

The Elementary and Secondary Education Act (ESEA) was first passed in 1965, emphasizing equal access to education for all children.

The Every Student Succeeds Act (ESSA) reauthorizes the ESEA to create a long-term, stable federal policy that gives states additional flexibility and encourages innovation — while at the same time holding states accountable for results.

Highlights of ESSA

- Maintains annual assessments for grades 3-8 and high school
- Increases state flexibility to design accountability systems, interventions and student supports
- Gives states flexibility to work with local stakeholders to develop educator evaluation and support systems
- Increases state and local flexibility in the use of federal funds

Standards

- The Every Student Succeeds Act reinforces state authority over standards, accountability and other key education policies.
- It prohibits any U.S. Secretary of Education from requiring states to adopt specific standards, assessments, teacher evaluation methods or other key policies.
- The law requires that state standards be aligned with college and career skills but defers to states on how to define such alignment.
Assessments

• Each state is required to have implemented a set of high-quality student academic assessments in math, reading or language arts, and science.
• Assessment timelines from current law are maintained.
• Assessments may, at the state’s discretion, measure individual student growth.

Assessments Discussion

What should the goal of a state assessment system be (rank in order of importance, with 1 being the most important)?

– Give a snapshot of a student’s performance at a single point in time
– Measure growth of individual students from year to year
– Provide feedback to teachers and school leaders for professional development
– Used for school accountability
– Other (Open Response)

Accountability

Each statewide system must “meaningfully differentiate” schools using:

• Academic proficiency on state assessments
• Graduation rates for high school
• English Language Proficiency
• Growth or another statewide academic indicator for K-8 schools
• Not less than one other state-set indicator of school quality or student success

Accountability Discussion

What are the most important things schools can do to help students succeed?
School Improvement

- States must use evidence-based interventions to help schools improve, but specific school improvement models are no longer required.

- The following schools will be identified for support:
  - Lowest-performing 5% of Title I schools* on state accountability index.
    *Title I provides financial assistance to districts and schools with high numbers/high percentages of children from low-income families.
  - High schools with <67% graduation rates.
  - Schools with underperforming populations that do not improve after a state-determined number of years.

School Improvement Discussion

Which of the following do you believe is most critical to improving a low-performing school?

- Curriculum
- Classroom assessment and district benchmarks
- Instruction
- School culture
- Student, family and community support
- Professional growth, development and evaluation
- Effective leaders
- Organizational structure and resources
- Comprehensive and effective planning

Teacher and Leader Quality

- ESSA allows states to fund their priorities in attracting, preparing, supporting and retaining effective teachers and leaders to serve high-poverty and high-minority student populations.

- ESSA authorizes new allowable federal funding for
  - Teacher and School Leader Academies
  - Activities to support principals
  - Educator training on the use of technology and data privacy
  - Reform of state certification, licensure and tenure systems
  - Development and implementation of teacher evaluation and support systems
  - Other state educator workforce priorities

Teacher and Leader Quality Discussion

How can the OSDE help all teachers and leaders serve low-income students, minority students, students with disabilities, and English Learners?
Outcomes for All Students

- ESSA requires states to ensure that all children have a significant opportunity to meet and exceed requirements. ESSA places renewed focus on
  - Long-term and ambitious goals for performance, with interim achievement goals for all students.
  - Better preparing diverse learners (i.e. English Learners, children with disabilities, migratory children, American Indian and homeless children) for success.
  - Two-way meaningful communication with families.

Outcomes for All Students Discussion

What can OSDE, school districts and community-based organizations do to support a learning environment to better prepare diverse learners (i.e. English Learners, children with disabilities, migratory children, American Indian and homeless children) for college and careers?

Gauge your interest or willingness in participating in one of the following ways:

- Allow parents to serve on decision-making committees
- Use child- and/or parent-led parent/teacher conferences
- Offer parents the opportunity to have input in their child's college/career pathway
- Host/attend family fun nights
- Digital communication allowing parents to interact with teachers and/or other parents
- Other options you would like to see?

Oklahoma’s Initial Transition Plan Key Milestones

<table>
<thead>
<tr>
<th>Date</th>
<th>Task</th>
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<tbody>
<tr>
<td>July-Aug. 2016</td>
<td>Collect early feedback for drafting</td>
</tr>
<tr>
<td>October 2016</td>
<td>Draft 1 of Plan posted for review/comment</td>
</tr>
<tr>
<td>November 2016</td>
<td>Additional opportunities for feedback</td>
</tr>
<tr>
<td>February 2017</td>
<td>Draft 2 of Plan posted for review/comment</td>
</tr>
<tr>
<td>May 2017</td>
<td>Governor's Review</td>
</tr>
<tr>
<td>July 2017</td>
<td>Submit Plan to USDE</td>
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ESSA FEEDBACK SURVEY RESULTS

EXECUTIVE SUMMARY

The Every Student Succeeds Act (ESSA) Feedback Survey studied feedback from education stakeholders on topics such as academic measurement, state assessment system, support from Oklahoma State Department of Education (OSDE), and how to use federal funds in initiatives. The analysis resulted in the following findings:

- The majority of educators prefer benchmark assessments and college and career readiness assessments, which provide more accurate and valid assessment for prompt improvement of student performance.
- Measuring growth of individual students from year to year and providing feedback to teachers and school leaders for professional development are considered the main goals of state assessment system.
- Graduation rate, opportunities for advanced coursework, and school culture are weighed as the three most important indicators for determining the academic success and college/career readiness of students.
- To support low-performing schools, stakeholders requested that OSDE provide professional development, financial support, and evidence-based instructional resources. To improve low-performing school, most educators indicated that effective leaders, student, family and community support, as well as school culture are critical factors.
- The majority of participants show positive support for current role of OSDE in development of a local intervention plan and suggest continual partnership with ongoing support.
- Efforts to retain effective teachers and leaders are regarded as the most important initiatives to use Federal Title II, Part A funds.
- Most educators agree that a strategy to align assessment, accountability and teacher quality with state academic standards so that the four elements work together toward interim goals is meaningful.

BACKGROUND/OVERVIEW

The Every Student Succeeds Act (ESSA), signed into law by President Obama in December of 2015, reauthorizes the Elementary and Secondary Education Act and replaces the controversial No Child Left Behind Act of 2001.

The ESSA restores greater flexibility about federal education policy to states and districts while ensuring accountability for the success of all children. In addition, the ESSA enhances the ability of the Oklahoma State Department of Education to collaborate with education’s many stakeholders – including parents, educators and community members – on an ESSA state plan improving results for kids. The EngageOK Summer conference served as a venue to seek such stakeholder feedback to inform the agency on the best use of federal funds. Poll Everywhere was utilized as a tool to collect data and to engage the live audience.

RESULTS

DEMOGRAPHICS

In this survey the State Department of Education (OSDE) collected responses from at least 278 participants during one-hour sessions facilitated by the State Superintendent of Public Instruction, Joy Hofmeister. Some participants provided multiple responses as applicable on certain questions, and some questions required multiple selections. For this reason, the actual number of responses varies by question and results do not always add up to 100%.
Education stakeholders from several different roles responded to the survey. The majority of responses resulted from teachers (44%), school administrators (33%), and others (15%). A small portion of participants (6%) represented community members, parents or business leaders. The variety of roles represented in this survey means the survey reflects the views of a wide variety of stakeholders rather than a single group, such as superintendents.

1. **COMMUNITY TYPES AND REGION**
This survey showed broad diversity of community and school stakeholders. It included 56% of responses from rural areas, 21% from urban, 21% from suburban, and 2% from virtual schools. As for regional distribution, all five regions (Northwest, Northeast, Central, Southeast and Southwest) participation percentages ranged from 8% to 34%.

2. **GROUPS**
Among all 435 responses from 184 respondents, the four main groups they represented were students with disabilities (86%), English language learners (60%), Indian tribes (30%) and early education organizations (28%).
1. **Academic Measurement**

Responses to the measurement of student progress showed that a majority of respondents favor benchmark assessments (85%) and college and career readiness assessment (84%), while approximately half of respondents support teacher-created assessments (47%) and statewide standardized assessments (45%). It indicates that our educators prefer to have more timely and frequent feedback so that more accurate and valid assessment of student performance will be available for improvement. After recent changes in the Oklahoma state testing requirements from a total of 26 tests in 2015-2016 to 18 tests in 2016-2017 for grades 3 and up, teachers will be able to focus more on curriculum, instruction and other assessments.

2. **Goal of State Assessment System**

When asked to select the two most important goals of a state assessment system, most participants highly valued the measurement of growth of individual students from year to year (93%) and providing feedback to teachers and school leaders for professional development (82%). These two goals echo with previous responses of favoring benchmark assessments, as they measure growth of individual students more often. The survey does not seem to
favor giving a snapshot of a student’s performance at a single point in time or using school accountability as a main goal of a state assessment system.

3. INDICATORS FOR ACADEMIC SUCCESS AND COLLEGE/CAREER READINESS

To determine the academic success and college/career readiness of students in our community, the indicators selected by survey respondents are considerably varied. The top three indicators selected by a majority of respondents are graduation rate (76%), opportunities for advanced coursework (68%), and school culture (45%). While the first two indicators are measureable and included the A-F report card grading system for accountability, the third most important indicator, school culture, is not easy to measure. In addition, only one-third of respondents report that standardized test scores are an important indicator, yet these scores are a major component of A-F report system. It could be that test scores are more likely taken as measures of student learning, not of student success.

4. SUPPORT FROM OSDE FOR LOW-PERFORMING SCHOOLS
To understand what support our communities need most from OSDE for low-performing schools, participants were asked to select top two areas among the five options. The result suggests that professional development for curriculum, instruction and assessment (71%), financial support (50%) and evidence-based instructional resources (45%) are the three most requested areas that OSDE can provide to improve school performance.

What top two supports should OSDE provide for low-performing schools?

- Financial support: 50%
- Evidence-based instructional resources: 45%
- Examples of schools that have improved: 18%
- PD for curriculum, instruction and assessment: 71%
- Data literacy/technical assistance support: 13%

5. **Role of OSDE in Development of a Local Intervention Plan**

Analysis of responses as to the role of OSDE in the development of a local intervention plan indicates that continual partnership with ongoing support is mostly expected (78%). Clearly, it’s a very strong and positive indication of educators’ support for the previous work of OSDE. Other roles that are expected for OSDE include one site visit per quarter with professional development options (13%) and/or one to two site visits per year (5%).

Development of a Local Intervention Plan

- None: 45%
- 1-2 site visits per year: 5%
- 1 site visit per quarter with professional development options: 13%
- Continual partnership with ongoing support: 78%

6. **Critical Factors to Improving Low-performing Schools**
To further identify areas OSDE can help in improving low-performing schools, survey respondents reported the top three critical factors to improving school performance are effective leaders (71%), student, family and community support (59%) and school culture (54%). This analysis can be related with the Equitable Access to Excellent Educators Plan (EAEE) as in this plan, professional development provided for principals and teachers was identified as a key approach to increasing access to qualified and effective teachers. Strong and effective leaders will also play a vital role in developing a diverse and inclusive community, as well as in nurturing effective school culture and working conditions.

Which of the following do you believe is most critical to improving a low-performing school? (Choose 3)

- Effective leaders: 71%
- Student, family and community support: 59%
- School culture: 54%
- Instruction: 31%
- Professional growth, development and evaluation: 31%
- Comprehensive and effective planning: 20%
- Organizational structure and resources: 16%
- Curriculum: 10%
- Classroom assessment and district benchmarks: 5%

7. **Rank of Importance for Initiatives to Use Federal Title II, Part A Funds**

In order to obtain feedback on usage of Federal Title II, Part A funds, respondents were asked to rank the top three most important initiatives. The results show that focusing efforts to retain effective teachers and leaders is extremely high (87%). The other several initiatives getting relatively high percentages are better implementation of induction and mentoring programs for new educators (58%), efforts to attract effective teachers and leaders (40%), and assisting districts in developing differential pay and other incentives to recruit and retain educators in high need areas (40%).

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<td>Efforts to retain effective teachers and leaders</td>
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<tr>
<td>Better implement induction and mentoring programs for new educators</td>
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<tr>
<td>Efforts to attract effective teachers and leaders</td>
</tr>
<tr>
<td>Assist districts in developing differential pay and other incentives to recruit &amp; retain educators in high need areas</td>
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<tr>
<td>Develop and assist districts with teacher-leader career ladder opportunities</td>
</tr>
<tr>
<td>Refine teacher and leader evaluation system</td>
</tr>
<tr>
<td>Revise and innovate certification system</td>
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8. **Evaluation of Current Strategy**
OSDE’s current strategy is to align assessment, accountability and teacher quality with state academic standards so the four elements work together toward interim goals. In the survey, when asked whether this strategy is meaningful, 85% of participants responded with “Yes”, and only 6% responded with “No”. This shows very strong support of this strategy from education stakeholders. Although in question 3 when asked about most important indicators for determining the academic success and college/career readiness of students, over half of respondents did not list teacher quality and state academic standards among the top three most important indicators, the responses to this question showed that educators preferred to align these four elements, but they might not find current measures of these four elements as meaningful as they could be. As such, future reforms of these elements to make it more meaningful and effective are necessary.

Do you believe a strategy to align assessment, accountability and teacher quality with state academic standards so the four elements work together toward interim goals is meaningful?

9. PARTICIPATION OF ACTIVITIES IN PROMOTING A BETTER ENVIRONMENT FOR DIVERSE LEARNERS

The survey proposed a series of activities to involve OSDE, school districts and community-based organizations in supporting a learning environment to better prepare diverse learners (i.e. English Learners, children with disabilities, migrant children, American Indian and homeless children) for college and careers. Survey respondents were encouraged to select any activities in which they would participate. All five activities received very high potential participation rate, and 97% people said they would like to have digital communication allowing parents to interact with teachers and/or other parents. The other four activities received similar percentage ranges from 59% to 71%.

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<td>Digital communication allowing parents to interact with teachers and/or other parents</td>
<td>97%</td>
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<td>Allow parents to serve on decision-making committees</td>
<td>71%</td>
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<td>Host/attend family fun nights</td>
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<td>Offer parents the opportunity to have input in their children’s college/career pathway</td>
<td>66%</td>
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<td>Use child- and/or parent-led parent/teacher conferences</td>
<td>59%</td>
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CONCLUSIONS

This study describes feedback on three major aspects of ESSA: academic assessments, state intervention and support system, and the use of federal funds.

For academic assessments, education stakeholders prefer to have a state assessment system that can provide more frequent and valid feedback to effectively improve education outcomes. Therefore, it is necessary to continue to make reforms to state testing to make it more meaningful and useful to educators. These efforts can
include steps such as the vertical alignment of tests so that they are more accurate measures of year-over-year growth and shifting from end-of-year tests to more formative assessments.

For local intervention and support from OSDE, this study found that the role of OSDE in continual partnership with ongoing support is highly endorsed. This study also identified three areas that demand most of OSDE support for low-performing schools: professional development, financial support and instructional resources. In addition, the top three most critical factors to improve a low-performing school are effective leaders, community support and school culture. All of these tie to the important role of OSDE in providing professional development for both effective leadership and effective teaching. An effective leadership can impact the community, provide positive school culture and encourage professional development for teachers to increase teaching effectiveness.

Moreover, efforts to retain effective teachers and leaders were ranked as the most significant priority in the use of federal funds. Providing more financial support to retain effective teachers and leaders will mitigate the problem of teacher shortages in Oklahoma. More research in finding the driving factors of losing effective teachers and leaders, as well as solutions to improve recruitment and retention, will be needed.
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**TOTAL NUMBER OF MEMBERS = 30**  REVISED ON 9/2016
August 1, 2016

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

Docket ID: ED-2016-OESE-0032

Dear Ms. Miller:

On behalf of the Oklahoma State Department of Education (the “OSDE”), included herein are public comments on the United States Department of Education’s (the “Department”) Notice of Proposed Rulemaking (NPRM) on accountability and state plans under the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (“ESSA”).

Generally, it is well understood that the intent of Congress in enacting ESSA was to allow states to have flexibility in designing their plans and systems to implement the requirements pursuant thereto. The OSDE commend the Department for moving ahead expeditiously with the implementation of ESSA. The new law, if administered in a manner consistent with Congressional intent, will give states, school districts, and schools greater flexibility in implementing programs that meet their particular needs, while ensuring a strong focus on improving educational outcomes for students. We appreciate the Department’s effort to ensure that regulations are promulgated in a timely manner in order to extend the benefits of the new law to families as quickly as possible. There are provisions of the proposed regulations that we support, as well as provisions that we believe need revision. Our comments are on the specific provisions that are most important to Oklahoma and its students. As such, we respectfully request the Department give serious consideration to the issues described below.

I. **Timeline for Implementation of New Accountability Systems**

ESSA provides that the revised accountability requirements of Title I “shall take effect beginning with the 2017-2018 school year.” Many found this language unclear, because it does not specify when states would have to begin identifying new schools for support and improvement, and through the proposed regulations the Department appropriately sought to dispel this confusion. Unfortunately, the policy recommendations put forward in the proposed regulations will likely be unworkable in Oklahoma.
The proposed regulation would require Oklahoma 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, we will need time to revise our new accountability system based on the new law, including the addition of new indicators of English language proficiency and school quality or student success, agreement on indicator weights and establishment of criteria and procedures for school identification. This effort will need to be carried out in close collaboration with the long list of stakeholder interests identified in the statute and regulations. Subsequently, we will need to collect the data needed for school identification, including data for indicators that might not yet exist. This process will take substantial time and effort, and require legislative or administrative actions. Stated otherwise, we will need the 2016-17 school year to design a new accountability system such that 2017-18 would be the first year of initial data collected under the new system, and 2018-19 the first year issuing accountability determinations under the new system (based on 17-18 data).

While we will make progress before the Department publishes the final regulations, it is certain that we would be working under unreasonable time constraints following publication of the final rules as we work to develop and submit Oklahoma’s state plan in March or July of 2017. Meanwhile, 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 their ability to align local programs and strategies with the goals, measures and strategies states will use to identify and improve underperforming schools under ESSA. Simply, the proposed timeline is unworkable.

Further, the Department has proposed that SEAs submit their consolidated state plans, which will include descriptions of their accountability systems, by March 6 or July 5, 2017. Assuming, for present purposes, that the Department uses the 120-day period provided in ESSA for review of state plans, a state that submits its plan in the second window will not receive the Department’s approval, or request for revision, of the plan until October. This seems likely given the length and complexity of the Department’s proposed requirements for those plans. Those states would thus have to identify schools, including placing some schools into at least a three-year cycle of continuous support and improvement, before knowing whether the Department has found their accountability systems meet the requirements within the law and regulations. While the proposed language allowing states to add indicators over time seeks to remedy this problem, at least one indicator in each of the five indicator categories would need to be in place at the time of the initial determinations.

A related concern is the timing for identification of high schools for comprehensive support and improvement and support based on their graduation rates. Under the statute, 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 the end of summer 2017, the same time at which SEAs would be required to identify schools.
Recommendation:

We appreciate Secretary King’s recent comments that the Department is open to reconsidering timelines. In support of these comments, we recommend that the Department 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. This is consistent with ESSA and will allow for states to implement high-quality accountability systems in 2017-2018 and use these systems to effectively identify underperforming schools.

II. Participation in Assessments – Proposed §200.15

Proposed regulations, at Section 200.15(c), provide:

To support the State in meeting the requirements of paragraph (a) of this section— (1) A school that fails to assess at least 95 percent of all students or 95 percent of each subgroup of students must develop and implement an improvement plan that— (i) Is developed in partnership with stakeholders (including principals and other school leaders, teachers and parents); (ii) Includes one or more strategies to address the reason or reasons for low participation rates in the school and improve participation rates in subsequent years; (iii) Is approved by the LEA prior to implementation; and (iv) Is monitored, upon submission and implementation, by the LEA; and (2) An LEA with a significant number of schools that fail to assess at least 95 percent of all students or 95 percent of each subgroup of students must develop and implement an improvement plan that includes additional actions to support effective implementation of the school-level plans developed under paragraph (c)(1) and that is reviewed and approved by the State.

Recommendation:

The OSDE respectfully requests that the Department reconsider the imposition of a penalty for failure to meet the ninety-five percent (95%) test participation mandate, given the frequency with which test participation can be below ninety-five percent (95%), particularly for one subgroup. Simply, the imposition of such a penalty for one instance of a subgroup failing to meet the mark, particularly considering the foreseeable occurrences of this occurring, is too prescriptive and harsh.

III. High School Graduation Rate Used to Identify Schools for Comprehensive Support and Improvement – Proposed §200.19

ESSA requires SEAs to 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 adjudicated youth, returning dropouts and other groups that, by their nature, need additional time to finish school. This proposal would also affect schools that enroll significant numbers of students who are “under-credited” when they begin high school. 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.

The Department 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. Further, the proposed regulation also negatively impacts schools that serve students with disabilities who need longer than four years of high school to be adequately prepared for post-secondary life. The proposed rule is contradictory to the Individuals with Disabilities Education Act of 2004’s (IDEA) requirement that States must provide a free and appropriate public education to students with disabilities ages 3-21 (34 CFR 300.101). Schools are required to serve students with disabilities through age 21 based on the individual needs identified in their Individualized Education Program (IEP) yet are also required, under this rule, to ensure that those students graduate within four years.

Under the Department’s proposal, many if not all of these schools would be identified for comprehensive improvement (essentially given a label of failure, even if they are successful); forced to divert their resources from educating students to developing a new improvement plan; and then have to implement new interventions (even if what they are already doing is highly successful), all because of the demographics of their students or their educational missions rather than their performance. In addition, the proposed rule would disproportionately identify high schools when funds may be spent more effectively addressing the failure of elementary and middle schools to prepare students to succeed in high school. According to the Notice of Proposed Rulemaking (NPRM), the Department bases its proposal on an apparent need for uniformity (even though it would create inconsistency between the graduation rate measure a State uses for its long-term goals, interim measures of progress and annual indicators versus the measure used to identify schools) and a desire to “signal the importance of on-time graduation as a key determinant of school and student success” (as though “on-time” graduation, defined as graduation by age 17 or 18, is often not a meaningful concept for the populations these schools serve). This proposed requirement instead works at cross purposes to the intent of the statute: Using the four-year adjusted cohort graduation rate as the sole trigger for identifying high schools for comprehensive interventions would systematically misallocate scarce intervention resources.

The Department’s proposal would be harmful to the missions of many successful high schools, both charter and non-charter. State departments of education should have the ability to look deeper into the specifics of a school’s graduation performance in order to better target scarce intervention resources to those high schools that actually require intervention, and not to those schools that simply serve populations such as credit-deficient students who became credit-deficient at a different school. The four-year adjusted cohort graduation rate is not fine-tuned enough for this purpose, which is why the statute permits a state to use an extended rate for its long-term goals, interim measures of progress and annual indicators.
Recommendation:

We strongly recommend that the Department grant states as much flexibility as permitted in the statute, which does not define the rate to be used, since even using extended-year rates might systematically penalize dropout recovery programs that serve over-age students. If there must be parameters on the definition in the final rule, we urge that, at minimum, it permit States to use the four-year adjusted cohort rate or an extended-year rate, or a combination of both.

IV. Procedures for Annual Meaningful Differentiation and Identification – Proposed §200.20

Section 200.20 of the ESSA Regulations states:

"In calculating school performance on each of the indicators for the purposes of annual meaningful differentiation under §200.18 and identification of schools under §200.19, a State must include all students who were enrolled in the same school within an LEA for at least half of the academic year. A State may not use the performance of a student who has been enrolled in the same school within an LEA for less than half of the academic year in its system of annual meaningful differentiation and identification of schools..."

Section 1111(c)(4)(F) of ESSA states:

(F) PARTIAL ATTENDANCE. – (i) In the case of a student who has not attended the same school within a local educational agency for at least half of a school year, the performance of such student on the indicators described in clauses (i), (ii), (iv), and (v) of subparagraph (B) – “(I) may not be used in the system of meaningful differentiation of all public schools as described in subparagraph (C) for such school year; and “(II) shall be used for the purpose of reporting on the State and local educational agency report cards under subsection (h) for such school year.”

The statute appears to give State and local educational agencies the ability to determine the minimum percentage of attendance required for students whose performance shall be used in the system of meaningful differentiation of all public schools. However, the regulations limit that ability by stating “the performance of any student enrolled for at least half of the school year must be included on each indicator of the accountability system...”

Recommendation:

Oklahoma defines Full Academic Year (FAY) status as a student enrolled within the first twenty (20) instructional days of the school year without a lapse of ten (10) consecutive instructional days through the remainder of the school year. As such, we believe that Oklahoma’s methodology for defining the students who are included in the accountability system indicators more accurately captures school performance than that which would be required by proposed Section 200.20.
V. Comprehensive Support and Improvement – Proposed §§200.21-200.23

The regulations should clarify that states and districts can implement comprehensive improvement efforts that address not only a school in need of comprehensive support and improvement but also the schools that feed students into that school. For example, a middle school identified for comprehensive support and improvement should be able to partner with the local educational agency (LEA) or state educational agency (SEA) to also address needs of the elementary school or schools that have been identified for targeted improvement and that feed into the middle school so that turnaround efforts can be sustained over a longer period of time. Labels should not constrain improvement efforts or the use of Sec. 1003(b) funds.

Recommendation:

Specifically, we recommend the addition of the following language to the proposed regulations:

In section 200.21(d), renumber paragraphs (5) through (7) as (6) through (8), respectively, and insert a new paragraph (5) reading as follows:

“(5) if the school is a high school or middle school, may address the needs of schools that feed students into that school, notwithstanding whether those ‘feeder schools’ are identified for comprehensive support and improvement;”

In section 200.22(c), renumber paragraphs (5) through (8) as (6) through (9), respectively, and insert a new paragraph (5) reading:

“(5) if the school is a middle or high school, may address the needs of schools that feed students into that school, notwithstanding whether those ‘feeder schools’ are identified for comprehensive support and improvement;”

VI. Funding to LEAs for School Improvement – Proposed §200.24

ESSA requires states to 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 a district agrees to accept less funding. Assuming that Oklahoma’s allocation increases to approximately seven million dollars ($10,000,000) based on the set-aside of seven percent (7%) and continues to designate five percent (5%) of schools for school improvement, at $500,000 per school, we would only be able to fund approximately twenty (20) schools. By way of comparison, Oklahoma currently designates approximately 625 schools for school improvement.1 Stated otherwise, under the proposed regulations, Oklahoma would only be able to fund less than five percent (5%) of schools designated for comprehensive improvement at the level the Department would require.

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1 More particularly, the 625 schools are comprised of 260 Priority, 362 Focus, and 3 Targeted Intervention.
Recommendation:

The OSDE recommends that the Department strike 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 among identified schools within the state.

VII. Defining Military-Connected Students – Proposed §§200.30-200.33

Branches of Service and Active Duty

Section 200.30(f)(1)(iv) defines the “Armed Forces” as the Army, Navy, Air Force, Marine Corps and Coast Guard, and it defines “active duty” as full-time duty in active service in one of these branches. Although these definitions will help us identify students whose family life and education history have been or may be affected by a parent’s military service, we believe they exclude students who face similar circumstances due to a parent’s service in activated National Guard or Reserve units.

The Military Interstate Children’s Compact Commission, to which all 50 states and the District of Columbia have signed on, defines active duty more broadly as “full-time duty status in the active uniformed service of the United States, including members of the National Guard and Reserve on active duty orders pursuant to 10 U.S.C. Section 1209 and 1211.”

Recommendation:

For consistency with existing state and national efforts to support students of military families, we recommend revising the definition of active duty service to include National Guard and Reserve personnel.

Definition of Parent

It is unclear from Section 200.30 whether a “parent” can include a stepparent or legal guardian serving in the Armed Forces. We anticipate cases in which a student lives in a household with a stepparent serving in the military, as well as cases where a student has a non-resident military parent. It is also possible for a student to live with a non-parent legal guardian as a result of a parent’s deployment or other military duty. All of these situations can affect a student’s home life, mobility and school enrollment history.

Recommendation:

For these reasons, we recommend expanding the definition of this subgroup to include students with a parent or legal guardian in the Armed Forces. Including guardians will allow us to capture more broadly the population of students who live with or have other close family relationships with military personnel.
Timeframe of Military Service

As proposed, Section 200.30 does not indicate whether a student is considered to be a child of a military personnel if that parent was on active duty at a specific point during the school year, or at any time during the school year. Because a parent’s duty status can change over the course of a school year, we request that the timeframe for qualifying military service be clearly defined to ensure consistent reporting within and across states.

Recommendation:

We recommend adding language to Section 200.30 clarifying that students are considered to be a child of military personnel if the parent or legal guardian is on active duty at any point during the school year.

VIII. Reporting Student Achievement and Progress – Proposed §200.33

Section 200.33 of the ESSA Regulations states:

Under proposed § 200.33(b), the determination of whether all students and each subgroup of students met or did not meet these State measurements of interim progress (based on the percentage of students meeting or exceeding the State’s proficient level of achievement) would be calculated using the method in proposed § 200.15(b)(1), in which the denominator includes the greater of—

- 95 percent of all students and 95 percent of each subgroup of students who are enrolled in the school, LEA or State, respectively; or
- the number of all such students participating in these assessments.

Recommendation:

It is respectfully requested that the Department clarify whether the “95 percent of all students” is meant to include only Full Academic Year (FAY) students (as defined) or both FAY and Non-FAY students.

IX. High School Graduation Rate - §200.34

The proposed regulations define “regular high school diploma” as:

“the standard high school diploma awarded to the preponderance of students in the State that is fully aligned with State standards, or a higher diploma, except that a regular high school diploma shall not be aligned to the alternate academic achievement standards described in section 1111(b)(1)(E) of the ESEA, as amended by the ESSA; and does not include a general equivalency diploma, certificate of completion, certificate of
attendance, or any similar or lesser credential, such as a diploma based on meeting individualized education program (IEP) goals that are not fully aligned with the State’s grade-level academic content standards.”

Further, the Department proposes that the four-year cohort is to be calculated as follows:

(1) The numerator must consist of the sum of—

(i) All students who graduate in four years with a regular high school diploma; and
(ii) All students with the most significant cognitive disabilities in the cohort, assessed using an alternate assessment aligned to alternate academic achievement standards under section 1111(b)(2)(D) of the Act and awarded a State-defined alternate diploma.

(2) The denominator must consist of the number of students who form the adjusted cohort of entering first-time students in grade 9 enrolled in the high school no later than the date by which student membership data is collected annually by the State for submission to the National Center for Education Statistics.

Recommendation:

We believe the regulation should explicitly state that meeting goals on an Individualized Educational Plan (IEP) should not be a determining factor for receiving a high school diploma. IEPs are not designed to be qualifying documents for obtaining a regular high school diploma; they are intended to be student-centered documents that are individually developed to provide information on specific goals, special education and related services and accommodations as necessary. We strongly urge the Department to ensure that there is a clear delineation between a diploma and meeting IEP goals. We also urge the Department to clarify what is meant in ESSA by developing an alternate diploma based on alternate academic achievement standards.

In addition, we believe the regulations should provide additional clarification around waivers of the one percent cap for students taking an alternate assessment. ESSA states that local districts should not exceed having more than one percent of students take an alternate assessment based on alternate academic achievement standards, but that they can do so by providing an explanation to the state education agency. The OSDE supports having a one percent cap on the number of students in a local school district who take the alternate assessment. However, we believe that there are circumstances at both the local and state levels that may require school districts to exceed the cap and in some instances may therefore also cause the state to exceed the cap. For example, a school that serves a number of students with significant cognitive disabilities may well exceed the one percent cap, particularly if said school is designed to predominantly serve such a student population. We recommend that the OSDE, just as other SEAs, work closely with any of their LEAs that exceed the cap and maintain waivers granted on file. In addition, the Department should, at a minimum, provide guidance as to what steps we need to take to request a waiver from the Department if the state exceeds the cap.
X. Per-Pupil Expenditures - §200.35

The proposed regulation at §200.35 requires, in part, that the annual report cards for public schools include the current funds received by a public school, excluding those received from private sources. It is unclear what is within the classification of “private sources” such that it would be beneficial to Oklahoma, and other states, to define the term. Further, the proposed regulation would require the financial information to be reported by December 31. Oklahoma does not receive final audited financial reports and complete data regarding the receipt and expenditure of funds until December 15 such that it would be an undue burden on the OSDE to comply with the December 31 mandate. Finally, the proposed regulations do not clearly articulate whether the required financial reports and information must identify Pre-Kindergarten program receipts and expenditures of funds.

Recommendation:

The OSDE respectfully requests that the Department define “private sources” so that Oklahoma, and other states, uniformly understand what is required to be excluded from the required financial reports. Additionally, the OSDE recommends that the Department require the financial information to be reported by June 30, not December 31, so as to not force an undue burden on the State. Finally, we respectfully request the Department to clearly identify whether Pre-Kindergarten programs are to be included, or excluded, from the required financial reports and information.

XI. Contents of the Consolidated State Plan – Proposed §§299.13-299.19

While the OSDE is generally supportive of the proposed regulations in the area of accountability, we have concerns with the proposed requirements for the consolidated state plan. ESSA 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. Since 1994, the Department has rightly taken this language very seriously, winnowing down the planning requirements under the individual programs and creating a bare-bones list of requirements consistent with Congressional intent that the consolidated plan be a mechanism for streamlining administration and reducing burden.

In its proposed ESSA regulations, however, the Department has proposed adding numerous, burdensome requirements that are not found in the statute and, it appears, has ignored statutory language calling for the plan to include only what is absolutely necessary. For example, proposed Section 299.14(c) would require the OSDE 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 the states would have to include 240 separate descriptions of their performance management systems, as well as additional performance information required under Sections 299.17(e) and 299.19(b). In addition to this unnecessary burden, it is illuminating that none of these descriptions are required under ESSA.
Recommendation:

The OSDE welcomes 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. As such, we recommend that that Department take an approach consistent with the Department’s strategy after 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.

Thank you for the opportunity to provide the OSDE’s views on the proposed regulations. Again, we find many positive features in the proposed regulations, along with a number of provisions that we urge the Department to revise. If you would like to further discuss the issues proposed, please do not hesitate to contact me.

Sincerely,

Joy Hofmeister
Oklahoma State Superintendent of Public Instruction
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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ESSA Key Messages
“Ask Me How School Librarians Ensure Student Success”

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

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

Title II
Supporting effective instruction

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

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

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

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

Message
School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.
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 KEY MESSAGES</th>
<th>STORY AND KEY DATA</th>
<th>THE ASK (What’s the need? Who are you talking to?)</th>
<th>PULLING IT ALL TOGETHER</th>
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CRAFTING YOUR ESSA ELEVATOR SPEECH

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

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

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

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

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

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

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

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

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| **[Title I]**  
School librarians and access to effective school library programs impact student achievement, digital literacy skills, and school climate/culture. | Nearly 60 percent of first year college students require some remediation.\(^1\)  
The critical thinking and research skills developed in an effective school library program are essential components of college readiness. | Ensure that students have access to school library programs throughout k-12 schooling. | We are seeing a disparity in preparedness among our incoming students. We count on students having digital literacy and information literacy skills that will allow them to do college level work and, all too often, those skills must be remediated. That deficit negatively impacts student engagement, retention, and academic performance. Please use Title I funds to help close that gap and ensure that all students in [state] have access to effective K-12 school library programs. (Speaker: College Administrator. Audience: State Legislator or Board of Ed Official.) |

| **[Title II, Part A]**  
School librarians are teacher leaders, providing professional development, building capacities around technology integration, and collaborating with colleagues for instruction and assessment. | Librarians lead professional development and committees. In this district, librarians trained teachers so that students can maintain digital portfolios across content areas. | Include school librarians in Title II funding plans for the state. | My librarians are integral to staff development and, in addition to leading committees throughout our district, they deliver quarterly professional development workshops for our teachers. Because of the librarians, our middle school students now have cross content digital portfolios. I urge you to specifically identify school librarians in state plans for use of Title II funds. (Speaker: District Administrator. Audience: State Board Official.) |

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\(^1\) National Center for Public Policy and Higher Education, “Beyond the Rhetoric: Improving College Readiness Through Coherent State Policy,”
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<th><strong>[Title II, Part B, Subpart 1]</strong> School librarians are uniquely suited to lead the effort in applying for competitive grants because of their expertise and access to strong professional learning.</th>
<th>I have written more than $25,000 in grants, and my literacy action research project provided the data and supporting documentation for our district’s successful IAL grant last year.</th>
<th>Appoint a librarian to the district’s Title II grant team. Through successful grant writing, I have secured more than $25,000 in library resources that are shared by teachers and students throughout the school. In addition, my literacy action research was incorporated into the district’s IAL grant. Please appoint me to the district’s Title II grant team. (Speaker: Librarian. Audience: District Administrator.)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>[Title IV, Part A]</strong> School librarians increase access to personalized, rigorous learning experiences supported by technology, allowing equitable resources for all students.</td>
<td>I work with the 5th grade science teacher to provide supplementary materials to the textbook for struggling and advanced readers. This allows all students to understand the core principals of topics such as electricity, and to scaffold to texts of higher reading levels.</td>
<td>Allocate block grant funds for library resources. Our school library offers digital and print materials that are accessible to every student in the building and this is critically important to our diverse population. When our 5th graders do their science unit on electricity, the library is able to supplement the text with materials from our shared databases, which even include audio support for struggling readers and English language learners. We also offer supplemental reading materials for kids performing above grade level. It is critical to have these resources in a place where all students and teachers can access them; please ensure that [state’s] implementation plan includes school libraries in its programs eligible for Title IV funds. (Speaker: Librarian. Audience: State Board Official.)</td>
</tr>
</tbody>
</table>
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](http://www.ala.org/aasl/sites/ala.org/aasl/files/content/researchandstatistics/slcsurvey/2012/AASL-SLC-2012-WEB.pdf)

**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:


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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

REFERENCES:


DISCLAIMER:
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APPROVAL/REVISION DATES: June 25, 2016
Meredith Miller  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 3C106  
Washington, DC 20202-2800

Dear Ms. Miller:

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

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

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

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

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

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

§299.15 – Consultation and Coordination

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

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

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

§299.19 – Supporting All Students

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Emily Sheketoff
Executive Director
Washington Office
American Library Association

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

Student Support and Academic Enrichment Grants (ESSA Block Grant)

SUMMARY OF PROGRAM

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

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

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

- The Administration’s FY2017 budget request included $500 million for Student Support and Academic Enrichment Grants.
- Prior to the August 2016 recess, the Senate Appropriations Committee provided $300 million and the House Appropriations Committee provided $1 billion in their respective bills for Student Support and Academic Enrichment Grants.
- The funding level will be finalized as part of negotiations to fund the Federal government for FY2017.

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

- States reserve 5 percent of their allocation for State-level activities and 95 percent of funds are provided for local awards to LEAs.
- Each LEA that receives a formula allocation must conduct a “needs assessment” and then must use:
  o Not less than 20 percent of funds to support well-rounded educational opportunities;
  o Not less than 20 percent of funds to support safe and healthy students; and
  o 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

  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 be prioritized to schools that have the greatest need, the most low-income children, are identified under the accountability system or identified as persistently dangerous. Similar to activities authorized at the State-level, LEAs are authorized to use their share of funds (95 percent) to:

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

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

  - May be conducted through partnerships; and

  - May include programs and activities, such as:

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

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

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

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

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

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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.