

ALA American Library Association

July 26, 2016

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

Dear Ms. Miller:

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

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

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

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

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

¹ For additional information see AASL definition of "[effective school library program](#)."

² For additional information from NCES, see http://nces.ed.gov/surveys/sass/tables_list.asp#2012.

To help build on these efforts under ESSA, our comments on the proposed regulations focus on consultation requirements under §299.15 and activities to support all students under §299.19.

§299.15 – Consultation and Coordination

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

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

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

§299.19 – Supporting All Students

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

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

School libraries are places of opportunity. Effective school library programs play a crucial role in bridging digital and socioeconomic divides. They foster a safe and nurturing climate during the day and before and after school, to serve as critical learning hubs for instruction and use of technology, digital, and print materials (including curation of openly licensed educational resources) to better prepare students for success for school and the workforce:

- *Avery County High School* – In Avery County High School (Newland, NC), the school librarian trains students and teachers on how to become a responsible consumer of information. The school library provides instruction on how to document resources; the importance of following copyright laws; safe use of online resources, including potential dangers of online sharing; and an awareness of the digital footprint all online users leave.
- *Weddington Hills Elementary School* – At Weddington Hills Elementary School (Concord, NC), digital literacy instruction is provided through the school library program. Students in kindergarten and first grades are learning skills such as keyboard recognition, how to access PowerPoint, how to obtain digital images following copyright requirements, and the importance of citing sources. Students in second and third grades are using various technologies to research, collect information, synthesize, and create new products, including a focus on academic honesty and copyright issues. By fourth and fifth grades, students are exploring digital tools for collaboration, multi-media presentations, analysis of data, and interaction with people and events beyond their own communities.
- *Centerville Elementary School* – From kindergarten up students are exposed to digital learning platforms and computers at Centerville Elementary School (Frederick, MD). From lessons on internet safety to proper citation of web sources to their digital footprints and cyberbullying, the students are receiving weekly lessons to help make them true 21st century learners.
- *Mooresville Intermediate School* – At Mooresville Intermediate School (Mooresville, NC), students receive digital literacy training in the school library related to accessing information sources, taking notes appropriately, citing sources, finding copyright-friendly images for projects, and using digital tools to share their learning in new, innovative ways.

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

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

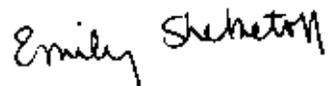
By providing access to an array of well-managed resources, school libraries enable academic knowledge to be linked to deeper, personalized learning. The expanded learning environment of the school library ensures the unique interests and needs of individual students are met. In this way, effective school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

Therefore, as the Department considers recommendations on the proposed regulations governing accountability and State plans under ESSA, we respectfully ask that the final regulations specifically include school librarians and school libraries under §299.15

(Consultation and Coordination) and §299.19 (Supporting All Students) to ensure that implementation of ESSA includes adequate consultation and an appropriate focus on the role of school libraries in using technology to improve academic achievement and digital literacy of all students.

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

Sincerely,



Executive Director
Washington Office
American Library Association



Executive Director
American Association of School Librarians
American Library Association