January 4, 2016

Secretary Mathews Burwell and Acting Secretary King:

On behalf of our nation’s 16,536 public and 98,460 school libraries, the American Library Association (ALA) commends the Departments of Education and Health and Human Services for developing Principles on Effective Family Engagement Practices (the Principles) and related recommendations for state and local stakeholders to systematically incorporate effective family engagement practices in programs for families with young children.

We strongly concur with the Departments’ holistic approach in addressing the whole child and recognizing the interrelated nature of wellness, learning, and family engagement in a child’s healthy development in the early years and ultimate success as they enter formal education and beyond. Libraries are committed to providing a broad range of services to children, parents and other caregivers, and educators that foster strong bonds in families, prepare children for formal education, and support adults working with children from the very earliest years through young adulthood. In the following comments, we detail some of many relevant local, state and national efforts of libraries to advance our shared goals of promoting children’s healthy development in all aspects of growth.

ALA respectfully encourages the Departments to recognize libraries as critical partners in advancing early learning opportunities and robust family engagement. More can be done to maximize the assets and capacity of more than 100,000 libraries nationwide. To this end, we urge that the Departments:

- Include relevant library research and resources related to early learning and family engagement in the Principles to provide a stronger foundation for action at local, state and national levels. We provide examples below;
- Systematically review existing federal program guidelines and regulations to identify, coordinate, and increase opportunities to foster family engagement and rich learning experiences. Where appropriate, libraries and other government or non-profit entities should be eligible entities for relevant funding to support these efforts;
- Convene national stakeholders to explore how they can support, coordinate, and invest in early learning programs to maximize impact at the federal level. The convening should develop and publicly release recommendations for action;
- Advocate for mapping existing state and local assets and leveraging existing organizations before creating new entities so as to maximize efficiencies and effectiveness. Partnerships should be encouraged where possible to build capacity across entities;
- Explicitly include libraries as a resource for professional development and in-service training opportunities related to family engagement and early learning to leverage expertise and build stronger state and local connections.

Finally, ALA welcomes the opportunity to further engage with the Departments as they work to implement the final Principles and recommendations.

**Libraries Serve Everyone, Everywhere**

ALA is the world’s oldest and largest association worldwide with 58,000 members and includes three divisions that focus on library services to young people: The American Association of School Librarians (AASL), the Association for Library Services to Children (ALSC), and the Young Adult Library Services Association (YALSA). The Public Library Association (PLA), another division of ALA, also contributes to the body of knowledge and expertise supporting parent and caregiver engagement in early learning opportunities. ALA this provides national leadership, professional guidelines and standards for services to families and children, and communications reach into libraries and communities nationwide.

Libraries have an historic commitment to supporting early learning and developing the habits that promote lifelong learning. This commitment is borne out at the federal level with the Institute of Museum and Library Services (IMLS) strategic focus on early learning in its FY15 budget request in which it states:

“Libraries and museums are fundamental to early childhood learning. IMLS has long supported the testing, development, and delivery of quality, impactful programming for young children as well as their caregivers, parents, and child care workers. In FY 2015 we will incorporate libraries and museums into comprehensive early learning strategies at the national, state, and local levels.”

State library agencies also advocate for the role of the library in supporting quality early learning opportunities among local libraries evidenced through their five-year strategic plans submitted to IMLS to receive federal funding. A full 100 percent of state library agencies are funding lifelong learning programs, and 80 percent are focusing on early learning.

Finally, local libraries tasked with implementing early learning programming provide a rich tapestry of the scope and variety of programs that are possible given trained professional staff,

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2 See [https://www.imls.gov/assets/1/AssetManager/GrowingYoungMinds.pdf](https://www.imls.gov/assets/1/AssetManager/GrowingYoungMinds.pdf).
partnerships with community organizations, and adequate funding and other resources. We provide a few examples of national, state, and local leadership below.

**Libraries support parents and caregivers as their child’s first and most important teacher**

“As trusted community institutions, museums and libraries can also be valuable resources for parent training and information. From informal play-and-learn groups to formal parent training to developing parent leadership and peer networks, museums and libraries are creating multiple pathways for building families’ knowledge, skills and agency. Finally, both onsite and in partnership with such organizations as schools and family service agencies, museums and libraries connect families to other resources and materials.”

Libraries across the country develop responsive and inclusive programming that supports parents and caregivers and other significant adults so that they are equipped with resources and knowledgeable about trends in childhood development. Libraries create practical opportunities that guide parents and caregivers through developmentally appropriate activities that promote social-emotional and cognitive development as well as literacy skills. Often beginning in prenatal classes, from outreach about talking, reading, singing, and playing with babies; to Storytime, summer reading programs, and out-of-school programs for youth, libraries welcome people at every stage in life. Through these programs, libraries contribute to developing habits that foster lifelong learning among families. In addition to serving all ages, libraries are dedicated to serving people from all backgrounds as is institutionalized in core professional values, “We value our nation’s diversity and strive to reflect that diversity by providing a full spectrum of resources and services to the communities we serve.”

Parents recognize this important place for libraries in their child’s development. Ninety-four percent of parents say the library is important for their children, with 84 percent of parents with children under age six say that libraries are very important to them.

As essential community assets, libraries should be leveraged to serve as the foundation for “parenting and family engagement hubs” recommended in the draft policy statement. Libraries actively seek opportunities to partner with community organizations to address specific community needs, including literacy, health and wellness, economic development, and civic engagement. We encourage the Departments to fully integrate libraries into their policy recommendations.

**National-level initiatives**

IMLS recognized the leading role libraries and museums play in advancing early learning opportunities—including STEM specific programs—with a special focus on such programs in its

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4 See [http://www.ala.org/advocacy/intfreedom/statementspols/librariesamerican](http://www.ala.org/advocacy/intfreedom/statementspols/librariesamerican).
budget requests in FY 2014 and FY 2015. IMLS also advances library programs in early learning through its numerous grants made to state and local libraries. In FY 2014 for example, IMLS committed to funding 20 projects for children not in formal preschool programs and therefore at risk for not being ready for school. This builds on earlier investments totaling more than $2.5 million in grants to libraries and museums in FY 2012 to help children from low-income families reach the goal of reading on grade level by the end of third grade and a similar funding priority in FY 2013 with $4.5 million for early learning projects. In addition to funding library projects, IMLS leads the way in partnerships and initiatives as is evidenced by:

- An Information Memorandum between IMLS and The Administration for Children and Families in 2012 encouraging collaboration between early childhood programs and public libraries to help meet the educational needs of young children and their families.
- Serving as a partner and investing in projects that support the goals of the Grade Level Reading Campaign to ensure low-income children succeed in school. Areas of focus include preventing summer reading loss and school readiness as well as parental engagement.

ALSC and PLA, both divisions of ALA, partner in Every Child Ready to Read® after concluding that library impact on early literacy could be even greater with a focus on educating parents and caregivers. The initiative provides a toolkit for libraries and other early literacy centers with tools to help prepare parent and caregivers for their role as their child’s first teacher. The curriculum focuses on children from birth through age five and on the five practices of early literacy: singing, talking, reading, writing, and playing. Research “indicates these simple parent-child interactions greatly enhance a child’s pre-literacy skills.” Over 4,000 libraries participate, reaching parents, especially high-needs parents, in communities across the country. ALSC has also extended its commitment to early literacy development by producing free resources for parents and caregivers with its Babies Need Word Every Day materials. These materials have been used at the local and state level by organizations like Reach Out and Read,

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12 See http://pdk.sagepub.com/content/96/7/30.abstract.
who reproduced the posters for distribution to pediatricians’ offices and museums.\textsuperscript{13} Through its Media Mentorship white paper, ALSC outlines the important role that librarians serve for families in navigating the digital world. This spans the age range, from questions about appropriate screen time for toddlers to creating content using digital tools.\textsuperscript{14}

There are several examples of libraries coming together to build capacity among the library community for supporting early learning. Family Place Libraries\textsuperscript{TM} is a vibrant example. These Libraries work with community organizations to connect families with critical resources that also support healthy development and relationships. Trained librarians create developmentally appropriate programs and especially work to connect with non-traditional library users. At the core for these libraries is the belief that “Family Place builds on the knowledge that good health, early learning, parental involvement and supportive communities play a critical role in young children's growth and development.” And the participating libraries see themselves as operating as community hubs for healthy development and parent engagement beginning at birth.\textsuperscript{15}

\textit{State-level initiatives}

Many state library agencies see promoting programs that foster early learning and engage parents and caregivers with their child’s learning as core role. They also seek ways to build capacity of the local libraries to implement responsive and effective programming that furthers learning opportunities while addressing local community need and priorities. We highlight three examples here.

\textbf{Early Learning in Maine}

Maine has a strong commitment to education as is evidenced through numerous programs and initiatives. Maine’s Governor recently recognized the impact the Maine State Library (MSL) could have on early childhood literacy via public libraries that are in the prime position to reach young children and their caregivers outside of the formal K12 educational system. Working through the Maine Department of Health and Human Services, MSL secured funding to create an Early Childhood Literacy Consultant. Since the original project, the Maine Legislature included funding to make this position permanent in the FY 2015 budget.

The Early Literacy Consultant at the Maine State Library works with public libraries across the state to improve the knowledge and practice of early literacy. The Consultant provides early literacy training, including topics of diversity in literature and parent engagement. Trainings are open to all professionals who work with ages 0-5: childcare providers, preschool teachers, library staff (public and school), Head Start teachers, and others. In addition, the Consultant provides programming and training for parents and caregivers.

The Consultant also works with other state agencies and organizations to increase impact and opportunity for Maine families. Partners include among others: the Maine Department of

\textsuperscript{13} See \url{http://www.ala.org/alsc/babiesneedwords/}.
\textsuperscript{14} See \url{http://www.ala.org/alsc/mediamentorship}.
\textsuperscript{15} See \url{http://www.familyplacelibraries.org/index.html}.
Education, the Department of Health and Human Services, the Maine Humanities Council, and Raising Readers.

**Colorado’s Project SPELL: Supporting Parents in Early Literacy through Libraries**

With funding from IMLS first awarded in 2012, the Colorado State Library partnered with several local libraries to develop Project SPELL: Supporting Parents in Early Literacy through Libraries. In its early stages, the planning team conducted an environmental scan to identify patterns in programs that have shown to be effective in engaging target audiences and promoting behavioral change, and created a blueprint of promising practices for libraries working with other agencies to deliver early literacy information and resources to low-income families with young children.

In 2014, IMLS awarded the State Library an additional grant to undertake a two-year project to test the SPELL blueprint recommendations in libraries across Colorado. With these funds, State Library staff has trained eight teams from public libraries and early literacy organization partners on the SPELL findings and recommendations developed during SPELL. The teams have been developing and testing local prototype programs to deliver early literacy messaging to low-income parents over the past year.

In January 2008, staff from more than a dozen Colorado public libraries and the Colorado State Library joined together and began working to develop a comprehensive approach to delivering and supporting early literacy services statewide. This work continues through Colorado Libraries for Early Literacy, which supports professional development and training, as well as the development of resources for parents like Storyblocks, a collection of 30-60 second videos designed to model to parents, caregivers, and library staff some songs, rhymes, and fingerplays appropriate for early childhood.

**Wisconsin’s Early Learning Initiative for Public Libraries**

This 2003 initiative started as a response to a call from the Superintendent of Public Instruction to explore how each division of the Wisconsin Department of Public Instruction could better serve families and young children. It specifically addresses two of the Superintendent’s goals: 1) closing the achievement gap between economically disadvantaged students or children of color and their peers and 2) shared responsibility—increasing parental and community involvement in our schools and libraries to address teenage literacy, drop-outs, and truancy.

The report recognizes the historic roles libraries have can be augmented through partnerships with community organizations. It also encourages libraries to focus outreach efforts to high-needs populations such as families living in poverty, teen parents, or an incarcerated parent. It states, “Beginning at birth, public libraries can play a role in helping parents and day care providers assure all children have the experiences they will need to learn to read by third grade, graduate from high school, and become lifelong readers who not only know how to read, but

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16 Personal email communication with Maine State Librarian and Early Literacy Consultant. December 30, 2015.
Among other issues addressed in the Wisconsin initiative are core needs for families to thrive which include enough nutrition, clothing, housing, and access to medical care in addition to programming that promotes learning and school readiness. Finally, the initiatives outlines specific areas of learning where libraries can develop innovative programming to foster parental engagement in their child’s early learning development.

Local library success examples

Libraries are responsive to trends in learning and educational pedagogy creating programming that promotes innovative, creative, and meaningful learning opportunities for young children and their families. In addition to the examples here, we wish to acknowledge again the Information Memorandum between IMLS and the Administration for Children & Families which created a document for Head Start agencies highlighting possible benefits from including public library programming and resources for the children and families they serve. The document provides a rich snapshot of the diverse programming available through libraries.

Culturally rich, intergenerational programs

The Pueblo of Santa Clara’s (N.M.) Community Library engages community members of all ages through a variety of programming. Technology Access Nights will foster responsible technology use and awareness among young learners and their families. An example of an inclusive learning program connects youth, elders, and their families and technology as they collaborate on oral history projects. Finally, a youth mentor/internship initiative “Bookworm Interns” in the Every Child Ready to Read Program® to connect youth mentors with young children and their families.

Partnering in the community

The Cazenovia Public Library (N.Y.) connects with young children and their families in the community through a partnership with CazCares, the local food pantry, in a unique family literacy program called The Story Room. CazCares serves low-income residents by providing access to critical services such as help with government service applications, nutritional education as well as adult literacy tutoring. The Story Room provides early literacy programs, including promoting parent engagement in reading and age appropriate play.

Connecting families, schools, and foundations for early learning

With support from the Cleveland Brown Foundation, the Kindergarten Club’s Cuyahoga County (O.H.) Public Library and Starting Point, an early childhood learning center, have partnered with four economically distressed school districts to foster parental engagement and ensure that children can make a smooth transition to kindergarten. The “Kickoff to Kindergarten” partnered with Cuyahoga County Public Library’s Kindergarten Club and March into Kindergarten, emphasizes a two-pronged approach to inform and encourage all parents how to prepare their children for kindergarten.

23 See http://cazcares.org/The_Story_Room.html.
children for kindergarten. The Kindergarten Club’s ongoing purpose is to help ease the transition into kindergarten for students and set them on a positive path at the start of school.24

**Recommendations to advance the Principles and increase impact for young children and their families through leveraging library expertise and capacity**

The preceding discussion and selected examples illustrate libraries’ commitment to family engagement in early learning. We appreciate that the Department of Health and Human Services and the Department of Education have called out libraries in the draft policy statement and other documents and believe we can go further, faster and with less duplication of services if we reduce siloes.

The *Principles of Effective Family Engagement Practices* outlined in the draft, for instance, are excellent but written narrowly to apply to the school and early childhood education settings. By framing the policy for school settings, the Departments are missing the opportunity to encourage community providers such as public librarians to embrace these principles. As the draft policy itself notes, family engagement requires that learning take place not only in the school setting, but also in the home. Similarly, family engagement practices should not take place only through the school and early childhood education settings, but in the broader community as well.

**Include relevant library research and resources related to early learning and family engagement**

As a result of the long standing library commitment to providing quality, responsive, culturally inclusive, and developmentally appropriate services, there are many library materials that can contribute to the robust collection of resources the Departments are compiling. We include a brief list here and welcome an opportunity to add to the compilation.

**Planning**

- *Growing Young Minds* (Institute of Museum and Library Services) highlights numerous ways in which libraries and museums create learning opportunities for all children. Among its points of emphasis is that parents recognize the importance of libraries to their children, and that library programs and collections support the parent’s role as their children’s first teacher. It exhorts policymakers to recognize the library and school communities’ contributions to early learning, and to include these communities in their efforts to reach children that remain disconnected from community early learning opportunities. [https://www.imls.gov/assets/1/AssetManager/GrowingYoungMinds.pdf](https://www.imls.gov/assets/1/AssetManager/GrowingYoungMinds.pdf)

- *Every Child Ready to Read®* is an effort led by the Public Library Association (PLA) and the Association for Library Service to Children (ALSC) to help libraries empower parents and other caregivers to support the literacy development of their children. Under the auspices of this effort, PLA and ALSC created a toolkit for libraries, which is now in its

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• **Public Library Summer Reading Programs Close the Reading Gap** (Dominican University) discusses and analyzes the results of an IMLS-funded study that assessed the impact of public library summer reading programs on student achievement. The report finds that participation in public library summer reading programs is correlated with better performance on reading achievement tests. It also finds that students who participated in library summer reading programs spent more time reading with their children over the summer and made more visits to the public library with their children. Based on these and other findings, it recommends greater investment in library reading programs and recognition of libraries as critical actors in the education community. http://gslis.dom.edu/sites/default/files/documents/IMLS_finalReport.pdf

**Professional Development**

• **Competencies for Librarians Serving Children in Public Libraries** is a list of ALSC’s recommended competencies for librarians and other library staff whose primary duties include delivering public library service to and advocating library service for children ages 0 to 14. The competencies are designed to promote leadership in the areas of access, advocacy, outreach, inclusion, and diversity. They speak to the importance of respect for diversity and cultural values, the need to understand the effects of societal factors on the needs of children, and the need to maintain diverse collections. http://www.ala.org/alsc/edcareeers/alsccorecomps

• **The Future of Library Services for and with Teens: A Call to Action Project** is the culmination of a yearlong forum on library services and teens conducted by the Young Adult Library Services Association (YALSA) and funded by IMLS. The report highlights challenges libraries face in serving increasingly diverse teen populations with tightening budgets. It also underscores the need to reimagine library services to teens in light of new technological developments. It concludes with recommendations for updating library services for and with teens for the 21st century.

• **Media Mentorship in Libraries Serving Youth** (ALSC) highlights the need for services to boost digital literacy among children and families, and argues that libraries are stepping up to meet this need. Additionally, the report suggests that libraries can and do play an important role in helping parents and caregivers appreciate the potential positive uses of media among children. Furthermore, it suggests that library schools and library administrators bear a responsibility to make sure that librarians can provide digital literacy services to families moving forward. http://www.ala.org/alsc/sites/ala.org.alsc/files/content/2015%20ALSC%20White%20Paper_FINAL.pdf

**For families**

• **School Library Programs Boost Student Learning** is a brochure from the American Association of School Libraries (AASL) outlining the goals successful school library
programs should pursue, and exhorting parents, teachers and administrators to work
together to ensure their school library programs meet these goals.
http://www.ala.org/aasl/sites/ala.org.aasl/files/content/aaslissues/brochures/aasl_parents_
8x11panels-FINAL.pdf

- **Babies Need Words Every Day: Talk, Read, Sing, Play** (ALSC) is a collection of sharable
  resources – including posters, a booklist and a media kit – designed to help parents boost
  their children’s literacy skills. The booklist is available here:
  http://www.ala.org/alsc/sites/ala.org.alsc/files/content/BabiesNeedWords_Booklist_FINAl.
pdf

- **Storyblocks** is a project of Colorado Libraries for Early Literacy in partnership with
  Rocky Mountain Public Broadcasting Services. It is a collection of 30-60 second videos
  designed to model to parents, caregivers, and library staff some songs, rhymes, and
  fingerplays appropriate for early childhood. Each video clip includes helpful early
  literacy tips to increase caregivers’ understanding of child development and pre-literacy
  needs. http://www.storyblocks.org/

*Systematically review existing federal program guidelines and regulations*

Libraries and other government or non-profit entities can often play greater roles if recognized
(and funded, where appropriate) in federal program guidelines and regulations. For a specific
example, the Departments should explore the opportunity for public library services to
strengthen the Early Intervention system (Part C of IDEA) through pilot programs, study and
funding. Part C of IDEA is implemented at the state level with significant variation in eligibility
guidelines and accessibility of services. Some states do not provide services to children with
delays under 50% or to children with risk factors which have been established to contribute to
developmental delay. These children, who either have mild or moderate delays or are at risk for
them, often go without any specific intervention until their delay worsens and they qualify for
Part C services.

Public libraries provide accessible services that engage families in ways which encourage child
development and can prevent developmental delay. Reading consistently to children, increasing
parent-child interaction, and educating parents about child development provides support that
can stabilize or even reverse delay. Public libraries have shown the potential to meet these needs
through programs such as Every Child Ready to Read. Even for children who are enrolled in Part
C, many states and communities struggle with accessibility of services due to large caseloads and
wait lists, low reimbursement of therapy providers, shortages of developmental physicians and
therapists, lack of parenting support programs, and other challenges. Bolstering services
provided through Part C with accessible programming at the public library has potential to help
children maintain or improve their developmental status. For these reasons, we encourage the
Departments to consider public libraries as entities for inclusion in federal programs such as Part
C.

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25 *See* The Early Childhood Technical Assistance Center’s Early Identification: Part C Eligibility website and table
of state criteria here: http://ectacenter.org/topics/earlyid/partcelig.asp.
Convene national stakeholders
As we’ve seen in multiple examples ranging from the recent Broadband Opportunity Council to expanding opportunities for women in business, the federal government has significant convening power to draw together a diverse cross-section of stakeholders. These convenings serve to focus and increase public attention on a given issue, bring together expertise and share best practices, and develop an agenda to advance common goals. They are particularly valuable when seeking to build a shared vision across sectors (or siloes), and can also serve as a model for replication at the state and local. We believe such a convening could speed and/or further cement strategic collaborations at all levels.

Another way in which national organizations and experts may be convened is through a National Research Council study process and/or workshop.

Advocate for mapping existing state and local assets
Libraries should be considered as community partners that can build capacity for family engagement not only through their education programs but through other services, as well. Research cited in the Departments’ draft policy (page 2) states that many diverse factors (secure housing, health care, access to nutritious food, family income) can have both positive and negative effects on child development, and that the wellness of not only the family but also the educator must be taken into account to systematically and successfully engage families in their children’s education.26 As a community asset, public libraries are uniquely qualified to assist all community members, including both families and educators themselves, with multiple areas of need. Research shows communities both expect public libraries to be pathways to economic success, health, and other achievements27 and that communities benefit in these areas from public library services, for instance by using library resources to increase adult literacy, learn about health, start their own businesses, seek employment, and get government agency help.28 The potential for public libraries to help address the basic needs that are barriers to family engagement is substantial, and the value of these community assets needs to be explicitly integrated into the Departments’ approach to family engagement.

In particular, we note that many local public and school libraries may already serve or have the capacity and desire to serve as a parenting and family engagement hub. In their respective communities and campuses, libraries often serve as a neutral, convenient and interdisciplinary meeting space for addressing cross-cutting issues and needs. Before establishing new hubs (page 8 of Draft Policy Statement), we recommend leveraging and investing in existing assets to speed implementation of shared learning and access to relevant information wherever possible.

**Include libraries as a partner and resource for professional development**

As referenced above, state library agencies in all 50 states are funding lifelong learning programs, and 80 percent are focusing on early learning as evidenced by their five-year strategic plans submitted to IMLS. Additionally, state library agencies are innovating in early learning and family engagement strategies in states as diverse as Colorado, Maine and Wisconsin. Collaborating on shared professional development opportunities that leverage and build on this expertise is both cost-effective and more likely to contribute to systemic and lasting change.

This also is true at the local level, where libraries are able to bring together public meeting space, diverse collections of early learning and parenting resources, and dedicated staff partners to collaborate with and host community learning events. As the one place dedicated to lifelong learning for people of all ages and backgrounds, libraries are uniquely well-positioned to support family literacy, learning and engagement in the full spectrum of what “family” means today (including among siblings, across generations and across extended family members).

**Conclusion**

In conclusion, libraries are proven partners in lifelong learning and family engagement at the national, state and local levels. We support the Principles and encourage the Departments to further integrate libraries into their vision to increase impacts and efficiencies. On behalf of the nation’s libraries, ALA stands ready to support the Departments in this important work and looks forward to additional opportunities to engage.

Respectfully submitted,

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