



## School Library Services

Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services

Report 2016-112

COMMITMENT  
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November 17, 2016

2016-112

The Governor of California  
President pro Tempore of the Senate  
Speaker of the Assembly  
State Capitol  
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As requested by the Joint Legislative Audit Committee, the California State Auditor presents this audit report concerning school library services. State law requires school districts to provide library services to their students and teachers, but leaves the level of services provided to the discretion of school districts. In 2010 the State Board of Education adopted the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards), which define educational goals for students at each grade level, including goals for information literacy.

This report concludes that state law does not clearly define the minimum level of school library services school districts should provide. School districts can provide library services by employing teacher librarians, contracting for the provision of library services with county offices of education that employ teacher librarians, contracting with public libraries, which are not required to employ teacher librarians, or by limiting their provision of library services to certain types that do not require a teacher librarian. School districts in the counties we visited—Sacramento, San Bernardino, and Tulare—provide varying levels of library services to their students and teachers. One school district contracts with its county office of education, whereas the other two school districts employ teacher librarians, but place them only in the advanced grades. As a result, their students in lower grades receive fewer types of library services, and some may receive no more than access to library materials.

In addition, state and county agencies have little authority to monitor the provision of library services when performing their oversight responsibilities. Although the Commission on Teacher Credentialing and the county offices of education we visited do monitor staffing assignments to verify that school districts employ or have access to certificated teacher librarians, they do not have express authority to assess whether districts actually provide library services. In addition, state law does not require county offices of education to ensure that their school districts consider the model standards when developing their local funding plans. As a result, school districts may be unaware that the model standards are one of the State's academic content and performance standards, and thus they may fail to identify the needs of their school library programs.

California has by far the poorest ratio of students to teacher librarians in the nation. In fiscal year 2013–14, California employed one teacher librarian for every 8,091 students while at the same time the national average was 1,109 students per teacher librarian. Although state law does not require school districts to employ teacher librarians, the model standards recommend employing one full-time teacher librarian for every 785 students. Finally, the number of individuals with active credentials authorizing them to provide library services has declined since fiscal year 2008–09. Thus, even schools that are interested in hiring teacher librarians may face difficulties in filling vacancies.

Respectfully submitted,



ELAINE M. HOWLE, CPA  
State Auditor

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## Summary

### Results in Brief

California's common core standards for K–12 schools state that students must be able to gather, comprehend, evaluate, synthesize, and summarize information and ideas effectively to be ready for college, workforce training, and life in a technological society. As a result, students must learn how to transform isolated bits of information into knowledge, evaluate sources, and think critically. State law authorizes teacher librarians—credentialed educators with specialized education—to teach students these skills in the subject known as information literacy, through instruction provided as part of schools' library services. In 2010 the State Board of Education (State Education Board) adopted the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards), which define educational goals for students at each grade level, including goals for information literacy.

State law requires school districts to provide library services, but it does not clearly define them, so districts may provide varying levels of service. For example, one school district may choose to provide its students and teachers only with access to library materials, whereas another school district may choose to also provide students with instruction in information literacy and research skills in accordance with the model standards. School districts can provide library services by employing teacher librarians, contracting for the provision of library services with county offices of education that employ teacher librarians, contracting with public libraries that are not required to employ teacher librarians, or using classified staff to provide only certain types of library services.<sup>1</sup>

School library programs in the counties we visited—Sacramento, San Bernardino, and Tulare—provide varying levels of library services to their students and teachers. The districts we visited in the counties of Sacramento and San Bernardino employ teacher librarians, but they place them only in the advanced grades. As a result, students in lower grades receive fewer types of library services, and some may receive no more than access to educational materials. Without the foundation of skills and knowledge established in earlier grades, students and teachers may not be able to achieve the goals of the model standards for later grades.

<sup>1</sup> Certificated personnel, such as administrators, teachers, and teacher librarians, are employees who have obtained valid certifications or credentials licensing them to provide designated school services. The term *classified staff* refers to other school employees who work in positions not requiring certification, such as instructional aides, library technicians, and clerical staff.

### Audit Highlights . . .

*Our audit of the provision of school library services highlighted the following:*

- » *School districts provide varying levels of library services to their students and teachers.*
  - *The districts we visited in two counties employ teacher librarians, but place them only in advanced grades.*
  - *In another county, the districts contract with the county office of education for the library services; however, that office employs only one teacher librarian who serves more than 100 schools across two counties.*
- » *There is no oversight at the State or county level for ensuring that schools do not assign classified staff to perform the authorized duties of a teacher librarian.*
  - *Many of the schools we visited use classified staff who are not certificated to provide certain library services.*
- » *The California Department of Education has not gathered the needed data to assess the extent to which schools provide library services or implement the model standards.*
- » *Although the model standards recommend school districts employ one full-time teacher librarian for every 785 students, California school districts reported employing one teacher librarian for every 7,414 students in fiscal year 2014–15.*
- » *California has the poorest ratio of students to teacher librarians in the nation.*

In Tulare County, the district we visited contracts with the Tulare County Office of Education (Tulare County Education) for library services; however, Tulare County Education employs only one teacher librarian who serves more than 100 schools across two counties, thus limiting the level of service she can provide to individual schools. Although the State's Commission on Teacher Credentialing (Teacher Credentialing) has issued guidance that this practice is one way to comply with state law, schools that obtain services in this way are unlikely to provide as many library services to their students and teachers as schools that employ their own teacher librarians. The district's administrators stated that they were satisfied with the services they receive from Tulare County Education and that they believe that classroom teachers provide sufficient lessons on information literacy and research. However, a district can better ensure the consistency and quality of such lessons in meeting the state standards if it employs at its schools teacher librarians who are specifically trained in these subjects.

In addition, neither the California Department of Education (Education), Teacher Credentialing, nor county offices of education are responsible for ensuring that schools do not assign classified staff to perform the authorized duties of a teacher librarian. Many of the schools we visited provide library services using classified staff who are not certificated to perform specific duties reserved only for credentialed teacher librarians, such as selecting library materials. However, Teacher Credentialing and the county offices of education we visited stated that they did not identify this activity as an inappropriately staffed position, referred to as a *misassignment*, because they lack the authority to monitor the assignments of classified staff. As a result, they only assess whether districts fill at least one teacher librarian position with an individual holding the appropriate credential instead of monitoring who provides those services at all of the schools. However, we compared Teacher Credentialing's and Education's data and identified 111 individuals whom districts reported as employed teacher librarians between fiscal years 2010–11 and 2014–15 but whom we identified as appearing to lack the requisite credential or permit at some point during that period. Because state law gives Teacher Credentialing broad authority to ensure competence in the teaching profession and to establish sanctions for the misuse of credentials and misassignment of credential holders, it could perform a similar electronic comparison to identify and follow up on employees without proper authorization who may be performing library services that require a teacher librarian credential.

Further, the county offices of education we visited do little to ensure that their school districts consider the model standards when developing their local funding plans because state law does

not require the county offices of education to do so as part of the Local Control Funding Formula (LCFF) review process. State law requires school districts to use the State Education Board's adopted template to address the implementation of academic content and performance standards within their local control accountability plans (LCAPs) by including a description of their annual goals for students' achievement. In addition, the county offices of education are responsible for reviewing and approving the LCAPs of school districts within their jurisdiction, but county offices of education are only allowed to ensure that districts' LCAPs adhere to the template. Although Education identifies the model standards as one of the State's academic content and performance standards, the template does not list any of the standards that school districts must address. As a result, school districts may be unaware that the model standards are one of the State's recommended academic content and performance standards, and thus they may fail to identify the needs of their school library programs.

Furthermore, Education has been unsuccessful in gathering data on the extent of library services that school districts provide throughout the State. State law requires school districts to report annually on the condition of their school libraries to Education, so Education developed an annual library survey to facilitate this requirement. However, Education did not design the survey to assess the extent to which schools provide library services or have implemented the model standards. For example, the survey only gathers limited information on library instruction, curriculum development, and professional development. In addition, since fiscal year 2008–09, fewer than half of the State's schools have participated in the survey. Without this information, Education cannot assess the extent of library services students are receiving.

Moreover, because of recent changes to its data collection process, Education cannot use the data it collected in fiscal year 2015–16 to accurately identify the number of teacher librarians employed statewide. According to Education's deputy superintendent of the District, School, and Innovation Branch (branch deputy), Education instructed districts about the recent changes by updating its data guide and providing multiple California Longitudinal Pupils Achievement Data System (CALPADS) trainings. However, the branch deputy explained that it is clear many districts did not understand the changes. Education plans to address the problems this lack of understanding could cause in the fiscal year 2016–17 data by providing training and emphasizing the issue in its CALPADS information meeting this fall. Without data on the conditions and staffing of school library programs, state decision makers cannot identify the weaknesses in the programs and develop solutions to address them.

School districts throughout the State do not employ enough teacher librarians on average to meet the staffing levels recommended in the model standards. The model standards recommend staffing based on student enrollment; however, the school districts we visited only employ teacher librarians to serve certain grade levels or they contract with a public agency that provides library services to a large number of schools. According to the model standards' goal, the State's school districts should employ a total of about 7,900 teacher librarians to serve the 6.2 million students enrolled in schools statewide. The model standards recommend having one full-time teacher librarian for every 785 students; however, in fiscal year 2014–15, California school districts reported employing only one teacher librarian on average for every 7,414 students, for a total of 841 teacher librarians statewide. Moreover, the number of individuals with active credentials authorizing them to provide library services has declined since fiscal year 2008–09, possibly because teacher librarians do not always earn additional pay and are particularly susceptible to budget cuts. Thus, even schools that are interested in hiring teacher librarians may face difficulties in filling vacancies.

California has the poorest ratio of students to teacher librarians in the nation, and unless it makes changes to increase the number of teacher librarians, its school library programs will continue to lag behind those of other states. Based on the most recent national data on teacher librarians, California employed only one teacher librarian for every 8,091 students in fiscal year 2013–14, while the state with the next poorest ratio, Idaho, employed one teacher librarian for every 5,533 students. At the same time, the national average was around 1,100 students per teacher librarian. We reviewed four states with large student populations and noted that the largest school districts within two of those states provided greater monetary incentives to their teacher librarians than the largest California school district—Los Angeles Unified.

School districts in California may find it difficult to afford a student-to-teacher librarian ratio similar to that of other states because California spends less than the nationwide average per student, even though the cost of living in California is generally higher than that of most other states. Thus, the general lack of financial support for education may, in part, be hindering school districts from employing and retaining more teacher librarians. Further, some states have laws that require school districts to employ a teacher librarian based on school size or grade level. For example, New York has a state mandate requiring the employment of one full-time teacher librarian for every 1,000 students in secondary schools. By establishing a state mandate on the staffing of teacher librarians, states demonstrate that they value library

services as a fundamental part of education. Unless California makes changes to increase the number of teacher librarians employed statewide, its employment of teacher librarians will likely continue to trail the rest of the nation.

### **Key Recommendations**

To ensure that students receive a level of library services that better aligns with the model standards, the Legislature should do the following:

- Define the minimum level and types of library services that schools must provide.
- Broaden the authority of Teacher Credentialing and the county offices of education to address classified staff who perform duties that require a certification.

To strengthen their library programs and help the State assess the condition of school libraries statewide, the school districts we visited in the counties of Sacramento, San Bernardino, and Tulare should do the following:

- Use the model standards to assess the needs of their school library programs and address any identified needs during their LCAP process.
- Require their schools to participate in Education's annual school library survey.

To strengthen school library programs in their counties and help school districts comply with state law, the Sacramento, San Bernardino, and Tulare county offices of education should provide guidance to their school districts on using teacher librarians for the provision of library services, completing Education's annual school library survey, and identifying the needs of their school library programs by using the model standards as part of their LCAP process.

To strengthen its monitoring of staff assignments, Teacher Credentialing should work with Education to identify potential misassignments by comparing annually the staffing information reported by school districts to Education against Teacher Credentialing's credentialing records. Further, Teacher Credentialing should incorporate the identified misassignments into its existing notification, reporting, and sanctioning structure.

To better understand the condition of school libraries statewide and to raise stakeholders' awareness of the State Education Board's adopted model standards, Education should do the following:

- Redesign its annual school library survey to solicit answers that will better help Education determine whether schools are implementing the model standards and better assess the type and extent of library services the schools provide.
- Use its directory of school districts to notify administrators about the annual school library survey and remind them that participation is mandatory.
- Work with Teacher Credentialing to assist it in identifying potential misassignments by providing staffing information reported by school districts to Teacher Credentialing by April of each academic year.
- Work with the State Education Board to incorporate consideration of all academic content and performance standards adopted by the State Education Board into the tools that guide the LCFF process, including but not limited to the LCAP template.

#### **Agency Comments**

The entities we reviewed generally agreed with our findings and conclusions, and indicated they will take actions to implement our recommendations.

# Introduction

## Background

California’s common core standards for K–12 schools state that students need the ability to gather, comprehend, evaluate, synthesize, and summarize information and ideas to be ready for college, workforce training, and life in a technological society. According to the American Library Association, librarians are uniquely qualified to teach students how to transform isolated bits of information into knowledge, how to evaluate sources, and how to think critically. Students in grades K–12 can learn these skills, known as information literacy, through instruction that teacher librarians provide as part of public schools’ library services.

State law requires school districts to provide their students and teachers with library services, which we describe in the text box. School districts may provide library services by employing teacher librarians, who are credentialed educators with specialized education and training in the provision of library services. School districts may also provide services by contracting with their county offices of education if those offices employ teacher librarians or by contracting with public libraries, which do not need to employ teacher librarians. In addition, school districts may use classified staff, such as teaching assistants, library aides, and clerical staff, to provide students with certain library services that do not fall within the list of duties that require a credentialed teacher librarian, as described in the text box on the following page. However, the employment of classified staff cannot be intended to supersede the requirement to include teacher librarians in the coordination and implementation of public school library programs.

Although school districts are not required to directly employ teacher librarians to provide library services, teacher librarians are trained and authorized to provide students and teachers with a broad range of library services that noncertificated staff cannot provide, such as instruction on information literacy. To become a teacher librarian, an individual must first obtain a valid teaching credential before completing an additional credentialing program approved by the Commission on Teacher Credentialing (Teacher Credentialing). Four California universities offer

### Definition of Library Services

School library services include, but are not limited to, the provision, organization, and utilization of materials and related activities supportive of the educational requirements prescribed by law and by the school districts, which may include the following:

- **Library Instruction**—Provide instruction to students that will enable them to become proficient users of library resources; provide in-service training for teachers.
- **Curriculum Development**—Provide information to teachers and administrators concerning sources and availability of instructional materials that will aid in the development of school curriculum; team with classroom teachers to develop units of instruction and activities using library resources in the instructional programs.
- **Materials Selection**—Provide assistance to teachers and students in the evaluation, selection, production, and uses of instructional materials.
- **Access to Materials and Information Resources**—Provide a collection of materials and resources that support the curriculum and are appropriate for user needs; plan a functional system, procedures, and services for maximum utilization of resources.
- **Professional Development**—Assist teachers, administrators, and other school staff members in becoming knowledgeable and current concerning appropriate uses of library media services, materials, and equipment.

Source: California Code of Regulations, Title 5, Section 16040.

### Authorized Duties of Credentialed Teacher Librarians

Teacher librarians and individuals with permits and credentials allowing for the provision of library services may do the following:

- Instruct students in accessing, evaluating, using and integrating information and resources in the library program.
- Plan and coordinate school library programs with the instructional programs of a school district through collaboration with teachers.
- Select materials for school and district libraries.
- Develop programs for and deliver staff development for school library services.
- Coordinate or supervise library programs at the school, district, or county level.
- Plan and conduct a course of instruction for those pupils who assist in the operation of school libraries.
- Supervise classified personnel assigned school library duties.
- Develop procedures for and management of the school and district libraries.

Sources: California Code of Regulations, Title 5, Section 80053 (b); the Commission on Teacher Credentialing's (Teacher Credentialing) *Administrator's Assignment Manual*, and Teacher Credentialing's guidance on Emergency Teacher Librarian Services Permits.

such credentialing programs: California State University, Long Beach; San José State University; Azusa Pacific University; and Fresno Pacific

University. In certain cases, a certificated teacher without a teacher librarian credential may provide the full range of library services if that teacher holds an emergency teacher librarian services permit (emergency permit) or possesses legacy teaching credentials; however, these legacy credentials generally have not been issued since 1994. The emergency permit requires a formal commitment to complete a teacher librarian credential program and can only be renewed twice, allowing a maximum of three years of emergency service.

### Local and State Responsibilities

County offices of education support school districts by performing tasks that can be done more efficiently at the county level. For example, a county office of education may provide library services to school districts that contract with it for those services. State law requires county offices of education to monitor teacher assignments at a selection of school districts annually, covering all school districts within their jurisdictions at least every four years. When a county office of education identifies a misassignment—someone who is not properly certificated for his or her assigned position—it must notify the district's administration that the district has 30 days to resolve the issue. If the misassignment is not corrected or explained, the county office of education must report it to Teacher Credentialing within 30 days. The county offices of education must also annually report to Teacher Credentialing the number and type of

misassignments they identified and whether the school districts resolved those misassignments, among other things.

Teacher Credentialing monitors teacher assignments in counties with a single school district and reports biennially to the Legislature information on teacher assignments and misassignments statewide. Teacher Credentialing is also the state agency responsible for issuing and revoking teaching credentials, issuing emergency permits, and promulgating regulations related to credentialing. Accordingly, it provides guidance on interpreting state law related to credentialing requirements and to the authorized duties of credentialed teachers, such as teacher librarians.

The California Department of Education (Education) is, among other things, responsible for receiving reports on the conditions and staffing of school libraries statewide. State law requires the State Board of Education (State Education Board)—California’s governing and policy-making body on education—to adopt standards and regulations related to school library services. These regulations define school library services and the duties of library personnel. In addition, state law requires school districts to annually report to Education on the condition of their libraries for a comparative study of school library conditions in the State. Education assists school districts by annually administering an online library survey that asks the schools about their libraries’ accessibility and resources, such as hours of operation and the age of their book collections. Education employs a library consultant who is available to assist the schools in completing the survey and who compiles the survey results for public use on Education’s website. In addition to the survey, Education collects other education data, such as enrollment counts, number of graduates, and the number of teacher librarians employed statewide. Education obtains this information from school districts annually for reporting purposes and makes the information available to stakeholders at all levels throughout the State.

### Standards for Library Services

The State Education Board adopted the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards) in 2010 to guide school districts in implementing strong library programs and to raise student achievement. The model standards establish educational goals for students at each grade level and describe the minimum staffing and resources required for effective school library programs. The model standards delineate a program for information literacy instruction that encompasses both primary and secondary education, and they provide grade-level standards that address the evaluation of information in text and other sources.

The model standards organize the State’s educational goals into four main concepts: accessing information, evaluating information, using information, and integrating information literacy skills into all areas of learning. Within those four concepts, the model standards define specific educational goals under 13 overarching standards that continue across all grade levels. The model standards then separate those goals into smaller,

#### Example of the Model School Library Standards’ Educational Goals for Evaluating the Relevance of Information for Selected Grades

##### Grade Four

- Extract and record appropriate and significant information from the text.

##### Grades Seven and Eight

- Assess the author’s evidence to support claims and assertions, noting instances of bias and stereotypes in a variety of visual and audio materials.
- Evaluate the sources for fact, opinion, propaganda, currency, and relevance.

##### Grades Nine Through Twelve

- Evaluate online search results, demonstrating an understanding of how search engines determine rank or relevancy.
- Analyze important ideas and supporting evidence in an information source by using logic and informed judgment to accept or reject information.
- Interpret meaning from charts, maps, graphs, tables, and pictures.

Source: *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve*.

more specific objectives that students should achieve by the end of a specified grade level or grade span, such as the span of grades nine through twelve in high school. For example, to evaluate information and determine its relevance—Standard 2.1—elementary, middle, and high school students should learn the skills described in the text box on the previous page. To accomplish these objectives, the model standards make recommendations regarding the staffing, accessibility, responsibilities, and resources of the library and teacher librarian. Moreover, according to Education, the model standards align with the State’s common core standards. However, compliance with the model standards is not required, so they constitute guidance, not a mandate.

### State Funding for Library Services

Since fiscal year 1998–99, the State has funded school libraries through a variety of models, with annual amounts ranging from as much as \$159 million in fiscal year 1998–99 down to \$4.2 million in fiscal year 2004–05. Under the current model, districts decide how best to spend school funding to meet their identified needs. Figure 1 shows the history of the State’s funding of school libraries and its transition to a local model.

**Figure 1**  
**Timeline of State Funding for Library Services**  
**Fiscal Years 1998–99 Through 2013–14**



Sources: Education Code sections 2574, 18180-18184, 41570-41571, and 42605; California State Auditor’s analysis of California Department of Education (Education) records of annual apportionments for library programs; the California Budget Act for fiscal years 2005–06, 2006–07, 2007–08, and 2013–14; and the fiscal year 2014–15 Governor’s budget.

\* State law defining the SLIBG did not specify spending requirements for library purposes. However, Education reported that \$23 million was used for library functions in fiscal year 2005–06. Education did not report any estimates for fiscal years 2006–07 and 2007–08.

In fiscal year 2013–14, California adopted the Local Control Funding Formula (LCFF), which replaced the previous funding model. This new process requires school districts to develop local control accountability plans (LCAP), in which they must describe their goals and allocate resources to achieve those goals. A district’s LCAP goals must align with the State’s eight priority areas, which include proper teacher assignments, standards implementation, and student outcomes, among others. As part of the priority area on the implementation of standards, Education instructs districts to address how they will implement the State Education Board’s adopted academic content and performance standards, which include the model standards. County offices of education are required to approve their school districts’ local funding plans if, among other things, they adhere to the State Education Board’s template. In addition, state law requires the State Education Board to develop an accountability tool, known as the evaluation rubrics, that includes state and local performance standards for all LCFF priorities and that, among other things, assists school districts in identifying strengths, weaknesses, and areas in need of improvement for school districts and schools. The State Education Board adopted its evaluation rubrics in September 2016.

**Scope and Methodology**

The Joint Legislative Audit Committee (Audit Committee) directed the California State Auditor to determine how well school districts and county offices of education are providing library services to students and if a sufficient number of teacher librarians are employed within the State. We list the objectives that the Audit Committee approved and the methods used to address them in Table 1.

**Table 1**  
**Audit Objectives and the Methods Used to Address Them**

AUDIT OBJECTIVE	METHOD
1	
Review and evaluate the laws, rules and regulations significant to the audit objectives.	We reviewed relevant laws, rules, regulations, and other background materials.
2	
Evaluate the policies, procedures, and practices at the California Department of Education (Education) and the Commission on Teacher Credentialing (Teacher Credentialing) related to library media teachers, also known as teacher librarians. Determine whether Education and Teacher Credentialing effectively guide school districts and county offices of education in complying with applicable laws, rules, and regulations.	For Education and Teacher Credentialing, we did the following: <ul style="list-style-type: none"> <li>• Interviewed staff and reviewed memos, policies, and procedures regarding guidance to school districts and county offices of education related to teacher librarians.</li> <li>• Determined whether Education had waived any requirements for library services and whether it worked together with Teacher Credentialing to ensure the provision of library services. Education has not waived any requirements related to the provision of library services. In addition, Education and Teacher Credentialing staff do not have a formal relationship specific to the provision of library services.</li> </ul>

*continued on next page ...*

AUDIT OBJECTIVE	METHOD
<p>3 For a selection of school districts and the corresponding county offices of education, determine the following:</p>	<p>We selected the counties of Sacramento, San Bernardino, and Tulare based on geography, student population, percentage of free or reduced price lunches, responses to the Education survey, and the number of teacher librarians. From those counties, we selected San Juan Unified School District (San Juan Unified), Redlands Unified School District (Redlands Unified), and Woodlake Unified School District (Woodlake Unified) based on comparable school district types and average rates of free or reduced price lunches for their students.</p>
<p>a. Whether the district and county offices are complying with laws, rules, and regulations related to credentialed teacher librarians and the provision of library services.</p>	<p>For the selected school districts and counties, we did the following:</p> <ul style="list-style-type: none"> <li>• Interviewed executive staff at the school district and county offices of education to determine how they provide library services.</li> <li>• Reviewed their policies, procedures, and records to determine whether they complied with applicable laws, rules, and regulations.</li> <li>• For a selection of schools with no teacher librarians, interviewed school site administrators to determine how they provide library services.</li> <li>• Interviewed classified library staff and reviewed their job duty statements to determine whether they included responsibilities restricted to credentialed teacher librarians.</li> </ul>
<p>b. Whether the district or corresponding county office of education employs a credentialed teacher librarian and, if so, whether that individual provides library services to one or more other districts in the county. Note any instances in which neither the district nor the county office of education employs any teacher librarians and determine the reasons they do not.</p>	<p>For each selected district and county office of education that employs teacher librarians, we did the following:</p> <ul style="list-style-type: none"> <li>• Interviewed a selection of teacher librarians and their school site administrators to determine the extent to which the schools provide library services.</li> <li>• For teacher librarians in each district and county office of education, we determined whether the teacher librarians' credentials were valid. All of the teacher librarians we reviewed had valid credentials during their employment.</li> </ul>
<p>c. For each selected district, determine how many schools within the district receive services from a credentialed teacher librarian and the frequency with which they are provided. In addition, determine how many schools receive services from a city or county public library and their frequency.</p>	<ul style="list-style-type: none"> <li>• We obtained current employment contracts each district has with teacher librarians and identified the number of schools they serve. With the exception of Redlands Unified's middle school teacher librarian (middle school librarian), we noted that all of the teacher librarians in the districts we visited are employed full time at their assigned schools. As we discuss in the Audit Results, the middle school librarian splits her time equally at four school sites.</li> <li>• We worked with county offices of education to identify school districts that contract with public libraries for services. The county offices of education we visited do not formally track which school districts contract with public libraries for the provision of library services. None of our selected school districts contract for library services with public libraries; however, we reviewed the contracts of two school districts that do. The contracts did not specify the number of schools that receive services from city or county public libraries nor did they identify the frequency of the services the libraries provide.</li> </ul>
<p>d. If the school district contracted with a city or county public library to provide school librarian services, determine whether that contract required staffing by a credentialed teacher librarian or another individual meeting Teacher Credentialing's professional requirement for credentialed teacher librarians.</p>	<p>None of our selected school districts contract for library services with public libraries; however, two county offices of education identified school districts that contract with public libraries for the provision of library services. One of the contracts specifies that the public library staff will provide services that overlap with a teacher librarian's authorized duties, but it does not require the public library to employ teacher librarians. Because state law allows public libraries to provide library services without expressly requiring them to employ a teacher librarian, we did not consider this an exception.</p>

AUDIT OBJECTIVE	METHOD
<p>4 To the extent possible, identify the total number of teacher librarians employed by school districts and county offices of education in California. If the number of credentialed teacher librarians is insufficient based on available indicators, determine what factors contribute to the shortage.</p>	<ul style="list-style-type: none"> <li>• We obtained data from Education to identify the total number of teacher librarians employed statewide.</li> <li>• We reviewed Education staff’s methodology for calculating the ratio of students to teacher librarians in its annual report. We noted that Education staff exclude certain school types from its calculation to provide a snapshot of school libraries in traditional school settings. This did not result in a significant difference, so we did not consider this an exception.</li> <li>• We interviewed Teacher Credentialing and Education staff to identify best practice models or studies. We reviewed those models and studies to identify indicators of a shortage of teacher librarians.</li> <li>• We obtained credentialing data from Teacher Credentialing to determine whether a sufficient number of teacher librarians are being credentialed to achieve the staffing levels that the State’s adopted standards recommend.</li> <li>• We reviewed the State’s historical funding of school library programs.</li> <li>• We interviewed administrators at credentialing institutions throughout the State.</li> </ul>
<p>5 Review and assess any other issues that are significant to the audit.</p>	<p>We obtained Education and Teacher Credentialing perspectives on Mariposa County Office of Education’s (Mariposa County Education) contract with Merced County for the provision of library services and Mariposa County Education’s statement indicating that it did not intend to use its contract for library services.</p>

Sources: California State Auditor’s analysis of Joint Legislative Audit Committee audit request 2016-112 and data obtained from Education; Teacher Credentialing; the county offices of education of Sacramento, San Bernardino, and Tulare; and the school districts of Redlands Unified, San Juan Unified, and Woodlake Unified.

### Assessment of Data Reliability

In performing this audit, we obtained electronic data files extracted from the information systems listed in Table 2 on the following page. The U.S. Government Accountability Office, whose standards we are statutorily required to follow, requires us to assess the sufficiency and appropriateness of computer-processed information that we use to support findings, conclusions, or recommendations. Table 2 describes the analyses we conducted using data from these information systems, our methods for testing, and the results of our assessments. Although these determinations may affect the precision of the numbers we present, there is sufficient evidence in total to support our audit findings, conclusions, and recommendations.

**Table 2**  
**Methods Used to Assess Data Reliability**

INFORMATION SYSTEM	PURPOSE	METHOD AND RESULT	CONCLUSION
Commission on Teacher Credentialing (Teacher Credentialing)  Credentialing Automation System Enterprise (CASE) as of June 2016	To determine the number of individuals authorized to provide library services by type from fiscal years 2008–09 through 2015–16.  To identify the credentials for a selection of teacher librarians as of June 2016.	We performed data-set verification procedures and found no errors. Further, we performed electronic testing of key data elements and did not identify any material errors. We reviewed existing information to determine what is already known about the data and found that prior audit results indicate there are pervasive weaknesses in the general controls over Teacher Credentialing's information systems. In addition, we identified a limitation in Teacher Credentialing's data. CASE contains credentials that are issued for the life of a holder. Teacher Credentialing generally stopped issuing these life credentials over 30 years ago in 1985. Further, holders are not required to report employment data to Teacher Credentialing; therefore, it does not update CASE to reflect the work availability of individuals with life credentials—such as whether the individual is currently employed, retired, or deceased. Because of this data limitation, we excluded nearly 8,200 individuals with life credentials from our analysis.	Not sufficiently reliable for these audit purposes. Although this determination may affect the precision of the numbers we present, sufficient evidence exists in total to support our audit findings, conclusions, and recommendations.
California Department of Education (Education)  California Longitudinal Pupil Achievement Data System (CALPADS) as of June 2016	To identify teacher librarians employed from fiscal years 2010–11 through 2014–15.  To determine the student-to-teacher librarian ratio in the State and for select entities for fiscal year 2014–15.	We performed data-set verification procedures and electronic testing of key data elements and did not identify significant issues. We did not perform accuracy or completeness testing on these data because the source documentation is located at multiple locations throughout the State, making such testing cost-prohibitive. To gain some assurance of the completeness of the data, we traced the universe of teacher librarians employed in fiscal year 2014–15 at select counties and school districts we visited to the CALPADS data. We identified no exceptions through this testing.	Undetermined reliability for these audit purposes. Although this determination may affect the precision of the numbers we present, sufficient evidence exists in total to support our audit findings, conclusions, and recommendations.

Sources: California State Auditor's analysis of various documents, interviews, and data from the entities listed in this table.

## Audit Results

### **State Law Does Not Clearly Define Required Library Services or Establish the Means for Ensuring Their Provision**

State law requires K–12 public school districts to provide school library services, but it broadly defines library services without identifying the specific minimum services districts must provide. In addition, state law requires the State Board of Education (State Education Board) to establish standards for library services; however, the standards it adopted are not enforceable. Because the State has no clearly defined requirements for library services, we were not surprised to find that the school districts and county offices of education we visited use different approaches and provide varying levels of library services. Further, because state and county agencies do little to monitor the provision of library services, the State lacks adequate data to assess the effectiveness of school library programs statewide, and students and teachers at some schools may be receiving inferior services.

### ***State Law Does Not Specify the Minimum Level of Library Services School Districts Must Provide***

State law does not clearly define the minimum level of services that school districts must provide, so the districts provide varying levels of library services to their students and teachers. According to state law, a school district may provide library services by employing a teacher librarian, employing classified library staff to perform basic library operations, contracting with a county office of education that employs a teacher librarian, or contracting with a city or county public library, which is not required to employ a teacher librarian.<sup>2</sup> Although state law does not specify the level or type of library services districts must provide, the State Education Board adopted the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards) in 2010; these model standards define educational standards for students at each grade level and describe minimum expectations for the level of library staffing and resources needed to ensure that the students will achieve these standards. However, the program guidelines that the State Education Board issues are not prescriptive, and state law requires the California Department of Education (Education) to notify school districts that compliance with the model standards is not mandatory. In the counties we selected for review—Sacramento,

<sup>2</sup> Certificated personnel, such as administrators, teachers, and teacher librarians, are employees who have obtained a valid certification or credential licensing them to provide designated school services. The term *classified staff* refers to school employees who work in positions not requiring certification, such as instructional aides, library technicians, and clerical staff.

San Bernardino, and Tulare—the schools we visited provided students with access to library materials; however, their provision of additional types of library services varied significantly.

State law defines library services as including, but not limited to, the provision, organization, and utilization of materials and related activities. It presents five types of services that may be included under library services but does not expressly require any of them. As a result, school districts can choose to provide services that do not require extensive teacher librarian involvement. For example, schools may use classified staff to provide their students and teachers access to materials, such as books, while limiting the use of teacher librarians to professional services, such as the selection of materials. Most of the schools in the districts we visited do not regularly employ teacher librarians on-site in their libraries; instead, they rely on classified library staff to operate the libraries. The schools that do employ teacher librarians generally provide more types of library services to their students and teachers than those that do not, as shown in Table 3.

Although the model standards establish educational goals for all grades K–12, the school districts we visited generally provide fewer types of library services to students in their elementary and middle schools than to students in their high schools. For example, San Juan Unified School District (San Juan Unified) in Sacramento County employs teacher librarians at each of its nine traditional high schools, but none at any of its elementary and middle schools. Because certificated teacher librarians are the only staff allowed to provide certain types of library services, San Juan Unified's elementary and middle school students and teachers receive fewer types of library services, with those services generally focusing on access to library materials.

Although the high schools' teacher librarians could theoretically provide additional services to the elementary and middle schools, the director of the district's human resources certified team stated that the teacher librarians are dedicated full-time to their assigned high schools. One teacher librarian explained that because the district does not assign dedicated library aides to the high school libraries, the teacher librarians are required to stay at their assigned locations to keep the libraries open. She stated that the teacher librarians can therefore only offer sporadic assistance to elementary and middle school libraries. This approach may affect the success of some students entering high school. According to the teacher librarian, she tested freshmen in high school to measure their knowledge of information literacy and noted that their scores were quite low. However, the model standards establish educational goals for elementary grade levels with the expectation that students will master the goals for previous grades as they advance in school. Without the foundation of skills and knowledge established in earlier grades, students may not be able to achieve the goals of the model standards for higher grades.

**Table 3**  
Types of Services Provided by Library Programs at Selected Schools

TYPE OF LIBRARY SERVICES	SACRAMENTO COUNTY				SAN BERNARDINO COUNTY				TULARE COUNTY			
	SAN JUAN UNIFIED SCHOOL DISTRICT		DEL DAYO ELEMENTARY SCHOOL		REDLANDS UNIFIED SCHOOL DISTRICT		MOORE MIDDLE SCHOOL		CRAFTON ELEMENTARY SCHOOL		WOODLAKE UNIFIED SCHOOL DISTRICT	
	DEL CAMPO HIGH SCHOOL	EL CAMINO FUNDAMENTAL HIGH SCHOOL	SYLVAN MIDDLE SCHOOL	REDLANDS HIGH SCHOOL	REDLANDS HIGH SCHOOL	MOORE MIDDLE SCHOOL	MOORE MIDDLE SCHOOL	CRAFTON ELEMENTARY SCHOOL	HIGHLAND GROVE ELEMENTARY	WOODLAKE HIGH SCHOOL	WOODLAKE VALLEY MIDDLE SCHOOL	
<b>Library Instruction</b>												
Provide instruction to students that will enable them to become proficient users of library resources.	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	No	No
Provide in-service training for teachers.												
<b>Curriculum Development</b>												
Provide information to teachers and administrators concerning sources and availability of instructional materials that will aid in the development of school curriculum.	Yes	Yes	No	Yes	Yes	Yes	Yes	No	No	No	No	No
Team with classroom teachers to develop units of instruction and activities using library resources in the instructional programs.												
<b>Materials Selection</b>												
Provide assistance to teachers and students in the evaluation, selection, production, and uses of instructional materials.	Yes	Yes	Yes*	Yes	Yes	Yes	Yes	Yes*	Yes*	Yes*	Yes*	Yes*
<b>Access to Materials and Information Resources</b>												
Provide a collection of materials and resources that support the curriculum and are appropriate for user needs.	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Plan a functional system, procedures, and services for maximum utilization of resources.												
<b>Professional Development</b>												
Assist teachers, administrators, and other school staff members in becoming knowledgeable and current concerning appropriate uses of library media services, materials, and equipment.	No	No	No	No	No	No	No	No	No	Yes†	Yes†	Yes†
Number of library service types provided	4	4	2	4	4	4	4	2	2	3	3	3
Number of full-time teacher librarians assigned	1	1	0	1	1	0.25‡	0	0	0	0†	0†	0†

Sources: California Code of Regulations, Title 5, Section 16040; California State Auditor's analysis of documentation provided by library staff and school site administrators of schools identified above; and interviews with key staff from those schools.

\* These schools use principals or library staff to select materials for the school library, a service the Commission on Teacher Credentialing only authorizes teacher librarians to provide.

† The school district contracts for library services with its county office of education whose sole teacher librarian serves more than 100 schools in Tulare and Kings counties.

‡ The school district employs one full-time teacher librarian who splits her time equally among four middle schools.

Redlands Unified School District (Redlands Unified) in San Bernardino County employs a teacher librarian who works at its four middle schools, so she is able to spend the equivalent of one day in any given week at each school. However, the services she provides are still limited. According to the two teacher librarians at Redlands Unified whom we interviewed, the district previously employed a teacher librarian at each of its middle schools, but budget cuts in 2009 eliminated three of the teacher librarian positions and modified the remaining position to serve all four schools. Redlands Unified's current model allows it to leverage its limited resources at its middle schools to at times provide a broader range of library services at each. Specifically, Redlands Unified employs classified staff at each of its middle school libraries, allowing the teacher librarian to provide additional library services to all four of her assigned schools.

In contrast, Redlands Unified does not employ teacher librarians at any of its elementary school libraries, and those libraries consequently provide fewer types of library services than do those of the middle schools and high schools. One of the district's teacher librarians stated that she is concerned that students will not see a connection between the library and the materials that support their curriculum because of the lack of credentialed teacher librarians at the elementary level. She asserted that introducing students to the purpose of a library at an early age greatly affects use of the library in high school.

Teacher librarians at San Juan Unified's and Redlands Unified's high schools also provide more types of library services than the districts' students and teachers receive in lower grades. In general, we noted that schools with teacher librarians provided the most types of library services to their students, as shown in Table 3 on page 17. Specifically, in these two districts, the teacher librarians at the high schools collaborate with the high school teachers in developing curriculum and instructing students on topics such as research skills and information literacy. For example, a teacher librarian in San Juan Unified collaborated with an English teacher to develop lessons on writing research papers, including identifying and documenting sources. In another instance, a teacher librarian in Redlands Unified developed procedures for students to assess the currency, relevance, authority, accuracy, and purpose of online information sources that they used in their coursework. These procedures address multiple goals outlined in the model standards relating to the evaluation of information.

***None of the teacher librarians could demonstrate that they provided professional development to their schools' teachers, administrators, or staff.***

However, although they provide curriculum development and instruction services, none of the teacher librarians could demonstrate that they provided professional development to their schools' teachers, administrators, or staff. One of the teacher

librarians in San Juan Unified stated that her school site and district administration have not shown an interest in the professional development that a teacher librarian can provide. Without the support of school and district administrators, teacher librarians may be unable to provide the full extent of library services that they are authorized and trained to perform.

Unlike the districts we visited that employ teacher librarians directly, Woodlake Unified School District (Woodlake Unified) contracts with the Tulare County Office of Education (Tulare County Education) for library services, an approach that limits the services its students and teachers receive. Under its contract, Tulare County Education provides the school district with access to online materials, access to books on a rotating basis, consultant services related to the development of library programs, and one day of technology consultation per year. Although Tulare County Education provided Woodlake Unified's schools with more types of services than schools without teacher librarians received in the other two districts we visited, Tulare County Education employs only one teacher librarian to serve over 39,000 students throughout Tulare and Kings counties. As a result of the large number of schools she serves, the teacher librarian must limit her visits to schools that directly request her assistance. She supervises six classified staff who work directly with over 100 schools on her behalf, acting as liaisons with the schools and telling school staff about the resources Tulare County Education has available.

Although the Commission on Teacher Credentialing (Teacher Credentialing) issued guidance that this practice is one way to comply with state law, schools that obtain services in this manner are unlikely to provide as many library services to their students and teachers as schools that employ their own teacher librarians. According to Woodlake Unified's school and district administrators, they do not see a need to employ a dedicated teacher librarian because they are satisfied with the services they receive from Tulare County Education, and they believe classroom teachers provide sufficient lessons on information literacy and research. However, by employing teacher librarians at a school—who are specifically trained in these subjects—a district can better ensure the consistency and quality of the lessons in meeting the state standards.

We identified no legal requirement that county offices of education support districts in the provision of library services, and the county offices of education we visited tend to provide limited support to their districts unless the districts contract with them to provide library services. Although San Bernardino County's Office of the Superintendent of Schools (San Bernardino County Education) offers contracted library services to school districts

***Schools that obtain services by contracting with a county office of education are unlikely to provide as many library services to their students and teachers as schools that employ their own teacher librarians.***

*The Sacramento County Office of Education does not employ teacher librarians, operate a library, or otherwise provide districts with any library services.*

that request them, an assistant superintendent stated that it has received no interest for such services from the school districts within its jurisdiction since dissolving its itinerant library service and replacing it with consulting services. San Bernardino County Education previously employed a roving teacher librarian who provided library services to outlying rural districts but discontinued the program because of difficulties coordinating the schedules of the districts and the teacher librarian. Nevertheless, it still provides some level of support to the districts by contracting with a teacher librarian to conduct free training workshops for teacher librarians and classified staff throughout the school year to facilitate discussion on topics such as increasing book circulation and holding literacy fairs. In contrast, the Sacramento County Office of Education (Sacramento County Education) does not employ teacher librarians, operate a library, or otherwise provide districts with any library services. According to Sacramento County Education's general counsel, it does not provide library services because it is not legally required to do so and it does not receive funding for this purpose.

#### ***State and County Agencies Perform Limited Oversight of School Library Services***

State and county agencies have little authority to monitor the provision of library services when performing their oversight responsibilities. Specifically, although Teacher Credentialing and the county offices of education we visited do monitor staffing assignments to verify that school districts employ or have access to certificated teacher librarians, they do not have express authority to assess whether districts actually provide those services. In addition, county offices of education and Education can do little to ensure that school districts address the model standards when developing their local funding plans.

Teacher Credentialing works with county offices of education to verify that school districts are capable of providing library services, but it is not authorized to ensure that districts are actually providing those services. Because certain library services may only be provided by a credentialed teacher librarian, Teacher Credentialing advises school districts to enter into contracts for library services with another public agency if they do not directly employ at least one teacher librarian. However, Teacher Credentialing has no other authority to ensure that the schools in these districts actually receive library services. We noted that the Mariposa County Office of Education entered into a contract for library services to ensure that its only school district could comply with state law, but it also indicated to its board of education that it did not anticipate using the services. Although Teacher Credentialing received evidence that

this county's office of education did not intend to use the contract, the director of Teacher Credentialing's professional services division stated that actually using the contract is a local decision outside the scope of its assignment monitoring authority. Similarly, the county offices of education we visited that have school districts that contract with other public agencies for library services do not verify whether those districts are actually using those contracts to receive such services. As a result, the State and counties are not ensuring that school districts that do not directly employ teacher librarians still provide a minimum level of library service to students and teachers.

In addition, no oversight mechanism exists at the State and county level to ensure that schools do not assign classified staff to perform the authorized duties of a teacher librarian. The three counties we visited collectively reported only nine and 11 teacher librarian misassignments in fiscal years 2014–15 and 2015–16, respectively, despite our observation that a number of the schools we visited employed classified staff who performed duties reserved for teacher librarians. For example, Sacramento County Education did not report misassignments for San Juan Unified even though the elementary school and middle school we visited had principals or classified staff selecting materials for their libraries, an activity that requires a certificated teacher librarian. Sacramento County Education's general counsel explained that, at the request of Teacher Credentialing, Sacramento County Education asks districts to provide it with evidence that they employ at least one teacher librarian. If districts do not employ any teacher librarians, Sacramento County Education asks them to explain how they provide library services. However, it does not verify those explanations because it believes it is the responsibility of the school districts to evaluate the provision of library services at the school level. Moreover, even though classified personnel may be improperly performing the activities reserved for certificated staff, Teacher Credentialing's professional services director stated that it does not have the authority to monitor classified personnel. Because Teacher Credentialing and the counties lack the authority to ensure that only certificated staff provide certain library services, students and teachers may receive these services from individuals who are not qualified to provide them.

However, we noted that Teacher Credentialing could identify likely misassignments statewide by comparing its credentialing data against the staffing information that schools report to Education annually. When we compared data between Teacher Credentialing's Credentialing Automation System Enterprise and Education's California Longitudinal Pupil Achievement Data System (CALPADS), we identified 111 individuals whom districts reported as employed teacher librarians at some point during fiscal

***No oversight mechanism exists at the State and county level to ensure that schools do not assign classified staff to perform the authorized duties of a teacher librarian.***

***Teacher Credentialing does not use staffing information it receives from Education to identify potential misassignments because it believes it is not clear that it has the authority or staffing to collect, analyze, or display the employment data for assignment monitoring.***

years 2010–11 through 2014–15 and who did not appear to possess the requisite credential or permit to provide library services. All of these individuals held valid teaching credentials but not the type of credential or permit that would authorize them to be employed as teacher librarians. About 11 percent of these individuals had held at one time the requisite credentials or permits but had allowed them to expire before the time of their reported employment. Another 11 percent of these individuals did not have the requisite credential or permit for a portion of the time the districts reported them as working as teacher librarians, but they later obtained valid credentials or permits.

According to Teacher Credentialing’s professional services division director, Teacher Credentialing has received staffing information from Education since fiscal year 2010–11. However, she stated that Teacher Credentialing does not use this information to identify potential misassignments because it is not clear that it has the authority or staffing to collect, analyze, or display the employment data for assignment monitoring. However, state law gives Teacher Credentialing broad authority to ensure competence in the teaching profession and to establish sanctions for the misuse of credentials and misassignment of credential holders. We, therefore, believe that Teacher Credentialing should continue to obtain this staffing information from Education and begin using it to identify and follow up on potential misassignments using its existing authority.

In addition, state law does not require the county offices of education to ensure that their school districts consider the model standards when developing their local funding plans. State law requires school districts to use the State Education Board’s adopted template to address the implementation of its academic content and performance standards within their local control accountability plans (LCAPs) by including a description of the school district’s annual goals for students’ achievement. County offices of education are then responsible for reviewing and approving the LCAPs of school districts within their jurisdiction. However, they are only allowed to ensure that districts’ LCAPs adhere to the template and that their budgets are sufficient and adhere to expenditure requirements. Although Education identifies the model standards as one of the State’s academic content and performance standards, the template does not list any of the standards that school districts must address.

Consequently, the county offices of education do not generally consider the model standards during their review. For example, Sacramento County Education’s general counsel explained that it reviews LCAPs according to the legal requirements of the statutes and regulations, which do not explicitly include determining if the LCAPs address the model standards. Similarly, San Bernardino

County Education's assistant superintendent of Education Support Services explained that San Bernardino County Education lacks the authority to request the information it would need to assess whether districts address the model standards during their LCAP process. Nevertheless, we believe county offices of education could provide guidance to school districts to consider the model standards when creating their LCAPs. For example, Tulare County Education's library media supervisor explained during a forum with school district superintendents that the model standards describe strong school library programs and encouraged them to use LCAP funds to support teacher librarian positions in their districts. Without additional guidance, school districts may not consider using the model standards during the LCAP process to identify weaknesses in their library programs and to develop goals to address those needs.

In fact, two of the school districts we visited had not fully assessed their needs related to the model standards, while the third district was not even aware that the model standards exist. Woodlake Unified's and Redlands Unified's assistant superintendents asserted that their districts' LCAPs address the model standards because the districts are implementing other state standards that overlap with the model standards. Woodlake Unified's LCAP identified goals specific to the State's common core standards, and it allocated funds for library services such as purchasing resources and extending library hours. Similarly, Redlands Unified provided us with an analysis showing that several of the model standards' goals align with those of the State's common core standards.

However, the model standards define far more goals related to library services than the common core standards. In fact, according to Education's analysis, the common core standards' goals overlap with fewer than half of the model standards' 64 goals for students in grades nine through 12. For example, unlike the model standards, the common core standards do not include goals related to demonstrating good citizenship online; understanding how to access and retrieve resources from local, regional, state, and national libraries; or using strategies to identify what should be read in depth. In addition, the model standards provide other specific guidance related to library services that is not included in the common core standards, such as goals related to library staffing and resources.

Finally, the associate superintendent for schools and student support of the third district, San Juan Unified, explained that district management was not familiar with the model standards or with the requirement to address them in the LCAP. Although school districts are not required to implement the model standards, state law requires school districts to use the LCAP template, which instructs districts to describe goals and identify the related

***Two of the schools districts we visited had not fully assessed their needs related to the model standards adopted by the State Board of Education that specify the level and type of library services districts must provide, while the third district was not even aware that the model standards exist.***

*Parents and other stakeholders may be unaware of the types of library services that exist and the guidelines for exemplary provision of those services.*

state or local priorities they address. The director of Education's local agency systems support office (systems support director) explained that if a district identifies a need regarding the degree to which it is implementing a specific standard, then it should develop a goal for implementing that particular standard. However, if school districts do not use the model standards' guidance to identify weaknesses in their library programs, they may be unable to identify their needs appropriately. As a result, parents and other stakeholders may be unaware of the types of library services that exist and the guidelines for exemplary provision of those services.

The State provides school districts and county offices of education with guidance on developing LCAPs, but this guidance does not appear to have been effective in leading districts to address the model standards. Specifically, the State Education Board adopted a template for districts to use when developing their LCAPs, but the template only specifies that school districts must address state academic content and performance standards and English language development standards. Education's website that answers frequently asked questions about the Local Control Funding Formula (LCFF) includes the model standards as one of the 11 content standards it says LCAPs must address. This guidance is not, however, incorporated into the template itself. According to the systems support director, Education does not review LCAPs to ensure that school districts address the 11 standards because the template instructs districts to develop goals to be achieved for each state and any local priorities. However, these goals are specific to the needs the districts identify, which do not necessarily cover all of the standards.

The deputy policy director and assistant legal counsel of the State Education Board (deputy policy director) stated that the State Education Board's LCFF evaluation rubrics, which it adopted in September 2016, aid in measuring a school district's performance in all LCFF priority areas and includes state performance standards for each LCFF priority. The deputy policy director noted that the State has allocated funding for the California Collaborative for Educational Excellence to provide workshops to school districts and county offices of education on the evaluation rubrics and the revised LCAP template that the State Education Board will adopt this fall. He believes this could reinforce that school districts and county offices of education should consider all of the State Education Board's adopted academic content and performance standards under this LCFF priority. Without this additional guidance, some school districts, such as San Juan Unified, may be unaware that the model standards are one of the State's recommended academic and performance standards or that they provide detailed guidance related to information literacy that is not found in the common core standards. As a result, some

districts may fail to adequately identify their needs for library services and not develop related goals within their local funding plans accordingly.

### ***Education Collects Incomplete Data Related to School Library Services***

School districts do not provide Education with the information necessary for it to issue effective guidance and to provide decision makers with accurate data related to library services. School districts are required to report the condition of their school libraries to Education annually, even though state law does not expressly require Education to ensure that school districts provide library services to students and teachers. State law requires the districts' reports to include statistical and other information that Education identifies as desirable for performing a comparative study of school library conditions in the State. Accordingly, Education provides an annual survey to schools that asks questions related to school library staffing, accessibility, and educational materials. However, Education did not design the questions to assess the extent to which schools actually provide library services or implement the model standards. For example, the survey only gathers limited information on library instruction, curriculum development, and professional development.

Because the information it collects is limited, Education cannot accurately determine the level of library services that schools provide. For example, in San Juan Unified, we noted that one of the schools without a teacher librarian that we visited indicated in its survey that it provided more types of library instruction to students than another school that employed a teacher librarian. However, we determined that the school without a teacher librarian only provided basic library instruction that was technical in nature—such as instructing teachers on the procedures for borrowing the library's laptops for student use in their classrooms. In contrast, the teacher librarian at the other school provided evidence that she had instructed students on information literacy and research skills. As this example demonstrates, Education's school library survey does not distinguish between basic instruction in library procedures and the substantive instruction that a teacher librarian is trained to provide on the topics of information literacy and digital citizenship that are covered in the model standards. Consequently, the survey results do not yield enough information for a meaningful comparative analysis of the level of library services that schools provide their students.

Even if Education designed the survey to capture this information, the survey responses might not accurately reflect conditions statewide because fewer than 50 percent of schools have completed the annual survey each year since fiscal year 2008–09—the year in which the State ceased providing funding specific to libraries.

***Because the information it collects is limited, Education cannot accurately determine the level of library services that schools provide.***

In addition, we noted that school sites without teacher librarians were less likely to complete the survey, potentially skewing the results to show a higher level of library services than actually exists. Of the three school districts we visited, San Juan Unified had the highest

participation rate in the most recent survey, with 85.5 percent of the district's schools responding to the survey, as shown in the text box. Most of the schools within the other two school districts did not respond to the survey. Several of the related school and district administrators we visited said they were unaware that the survey was mandatory or that it even existed.

#### Fiscal Year 2014–15 School Library Survey Response Rates for the Counties We Visited

**Sacramento County:** 42.3 percent

- San Juan Unified School District: 85.5 percent

**San Bernardino County:** 60.4 percent

- Redlands Unified School District: 30.8 percent

**Tulare County:** 23.2 percent

- Woodlake Unified School District: 16.7 percent

Source: California Department of Education's annual survey responses.

We also found that Education's information for library contacts at both the school and district levels, such as principals, teacher librarians, or district administrators, was incomplete. Education's school library technology consultant stated that she faces challenges in determining which county offices of education have library programs, identifying which districts have a teacher librarian overseeing programs

at the district level, and identifying which schools have a library. In addition, she explained that Education does not have the authority to sanction schools that do not complete the survey, so it lacks the ability to increase survey participation. However, Education maintains an online directory of administrators at the school and district level, which she could use to notify them of the reporting requirement. Most of the schools we visited that did not respond to the survey asserted that they would have participated had they known of the requirement. As a result, Education might significantly improve participation by revamping its survey process and related communications.

Education's ability to assess the condition of library services statewide is further limited by problems with the statewide data it collects to satisfy federal requirements. Every year, school districts report student enrollment and staffing information to Education, including the number of teacher librarians they employ. However, because of recent changes to its data collection process, Education cannot use the data it collected in fiscal year 2015–16 to accurately identify the number of teacher librarians employed statewide. According to Education's deputy superintendent of the District, School, and Innovation Branch (branch deputy), in fiscal year 2015–16 Education changed its way of collecting data at the request of teacher librarians who wanted to be categorized as teachers who teach specific courses rather than as staff providing pupil services. To instruct districts about the changes in the way they should report teacher librarians, Education updated its data guide and provided multiple CALPADS trainings. However, according to Education's school library technology consultant, the number of reported teacher librarians dropped by 75 percent.

The branch deputy explained that it is clear many school districts did not understand that they needed to change how they submitted the data on teacher librarians. He stated that Education could determine the sources of the biggest discrepancies and decide if contacting the related districts would be beneficial, since the districts are able to modify the information they submitted at any time. Unless Education follows up with districts that reported a significant decrease in the number of teacher librarians, the fiscal year 2015–16 data will likely remain an inaccurate source for the number of teacher librarians. The branch deputy explained that Education plans to address the problem in fiscal year 2016–17 by emphasizing the change in the reporting process in a CALPADS information meeting this fall and by providing training, including a special training in conjunction with the California School Libraries Association in January 2017. Education will need to monitor the success of these efforts to ensure the effectiveness of its data collection; otherwise, it will not be able to provide accurate information on the number of teacher librarians California schools employ.

### **The Number of Teacher Librarians Employed Statewide Is Much Lower Than the State’s Adopted Standards Would Recommend**

School districts throughout the State do not employ enough teacher librarians on average to meet the staffing levels recommended in the model standards. The model standards recommend staffing based on student enrollment; however, as previously discussed, the school districts we visited employ teacher librarians to serve only certain grade levels, or they contract with a public agency that provides library services to a large number of schools. Further, the number of individuals with active credentials authorizing them to provide library services has declined since fiscal year 2008–09, possibly because teacher librarians do not always earn additional pay and appear to be more susceptible to budget cuts. Thus, even schools that are interested in hiring teacher librarians may face difficulties in filling vacancies. Unless the State makes changes to increase the number of teacher librarians, its employment of teacher librarians will likely continue to trail the rest of the nation.

### ***Not Enough Individuals Currently Hold or Are Applying for Teacher Librarian Credentials to Meet the Model Standards’ Goals***

In part because California teachers lack strong incentives to pursue a teacher librarian credential, the State does not have enough certificated teacher librarians with active credentials or emergency permits to achieve the model standards’ recommendation. According to the model standards’ recommendation, the State’s school districts should employ about 7,900 teacher librarians to serve the 6.2 million

students enrolled in schools statewide. The model standards recommend having one full-time teacher librarian for every 785 students; however, in fiscal year 2014–15, California school districts reported a total of 841 teacher librarians statewide, which equates to only one teacher librarian for every 7,414 students. As shown in Table 4, none of the counties or school districts we visited met the staffing level the model standards recommend.

**Table 4**  
**Student-to-Teacher Librarian Ratios for Selected Counties and School Districts**  
**Fiscal Year 2014–15**

County	Sacramento	San Bernardino	Tulare
Number of districts	13	33	46
Number of schools	372	552	194
Number of teacher librarians	29	43	3
Number of students	241,017	410,687	102,206
<b>Student-to-Teacher Librarian Ratio</b>	<b>8,311-to-1</b>	<b>9,551-to-1</b>	<b>34,069-to-1</b>

District	San Juan Unified	Redlands Unified	Woodlake Unified
Number of schools	74	27	6
Number of district-employed teacher librarians	9	4	0
Number of students	49,114	21,326	2,291
<b>Student-to-Teacher Librarian Ratio</b>	<b>5,457-to-1</b>	<b>5,332-to-1</b>	<b>0*</b>

High Schools	Sacramento	San Bernardino	Tulare
Number of schools	16	6	3
Number of district-employed teacher librarians	9	3	0
Number of students	15,975	7,329	723
<b>Student-to-Teacher Librarian Ratio</b>	<b>1,775-to-1</b>	<b>2,443-to-1</b>	<b>0*</b>

Middle Schools	Sacramento	San Bernardino	Tulare
Number of schools	15	5	1
Number of district-employed teacher librarians	0	1	0
Number of students	10,787	4,774	492
<b>Student-to-Teacher Librarian Ratio</b>	<b>0</b>	<b>4,774-to-1</b>	<b>0*</b>

Elementary Schools	Sacramento	San Bernardino	Tulare
Number of schools	43	16	2
Number of district-employed teacher librarians	0	0	0
Number of students	22,352	9,223	1,076
<b>Student-to-Teacher Librarian Ratio</b>	<b>0</b>	<b>0</b>	<b>0*</b>

Sources: California State Auditor's analysis of documents from the districts and counties indicated above, and data obtained from the California Department of Education's California Longitudinal Pupil Achievement Data System and California Basic Educational Data System.

\* The school district contracts for library services with its county office of education whose sole teacher librarian serves schools in Tulare and Kings counties with over 39,000 students in total.

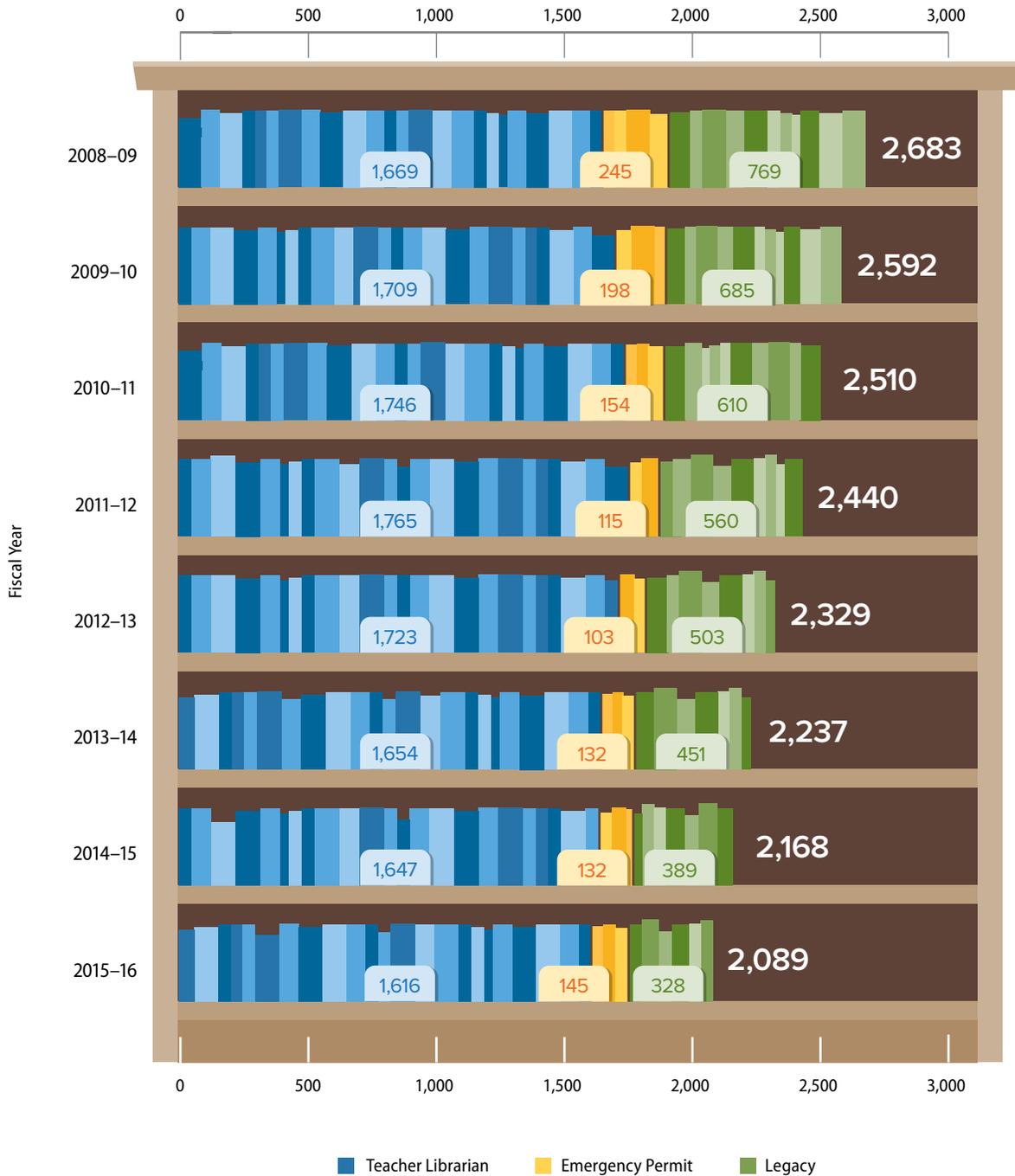
Moreover, according to Teacher Credentialing's data, fewer than 2,100 individuals in the State had active credentials authorizing them to provide library services in fiscal year 2015–16. Consequently, even if every one of these teachers were employed to provide services, California would still fall far short of the model standards' recommendations. Teacher Credentialing's data further indicate that the number of individuals with active credentials decreased 22 percent between fiscal years 2008–09 and 2015–16, from nearly 2,700 to nearly 2,100, as shown in Figure 2 on the following page. Although most of the decrease is attributable to the declining number of individuals with legacy credentials, which Teacher Credentialing generally stopped issuing after 1994, the number of individuals with teacher librarian credentials or emergency permits also decreased by 8 percent over this period, from 1,914 in fiscal year 2008–09 to 1,761 in fiscal year 2015–16. Thus, the number of teachers pursuing teacher librarian credentials appears to have decreased as well.

*The number of teachers pursuing teacher librarian credentials or emergency permits appears to have decreased.*

According to the program director of Teacher Librarian Services at Fresno Pacific University (Fresno program director), earning a teacher librarian credential does not usually lead to a significant pay increase and can even lead to lower compensation if taking a librarian position involves the teacher switching districts and losing a longevity bonus. At the same time, the credentialing process requires a substantial investment of time, money, and effort. Specifically, the four credential programs for teacher librarians in California require at least 27 units of coursework and cost between \$9,000 and \$20,000, in addition to the cost of becoming qualified to be a teacher.

Because California teachers lack strong incentives to pursue a teacher librarian credential, the number of certificated teacher librarians may continue to shrink. Of the three school districts we visited, only San Juan Unified paid its teacher librarians extra for the additional credential—an annual stipend of \$2,139. The other two school districts we visited only provided additional pay if a teacher librarian took enough semester units to qualify for a different pay scale—a practice that is not exclusive to teacher librarians. According to the teacher librarian program coordinator at San José State University (San José program coordinator), some teachers may also choose not to pursue the credential because they are aware that teacher librarian positions are usually among the first cut by school districts when funding drops. We noted one example at Redlands Unified where a current teacher librarian had previously lost her job as a middle school teacher librarian in 2009 because of budget issues. She briefly worked at the district as a high school teacher before eventually returning as a teacher librarian in 2016. Given that only 841 of the 2,168 individuals with credentials authorized to provide library services were actually employed as teacher librarians in fiscal year 2014–15, other teacher librarians may have had similar experiences.

**Figure 2**  
Number of Individuals Authorized to Provide Library Services, by Type  
Fiscal Years 2008–09 Through 2015–16



Source: California State Auditor’s analysis of data obtained from the Commission on Teacher Credentialing’s Credentialing Automation System Enterprise.

Note: An individual may have multiple credentials in a given fiscal year. To ensure we did not count individuals more than once in a given fiscal year, we assigned each individual to a category using the following order: Teacher Librarian, Emergency Permit, or Legacy credential type. For example, if an individual had both teacher librarian and emergency permit credentials, we counted the individual only in the teacher librarian credential type.

In fact, some school districts and counties have experienced difficulty attracting qualified teacher librarian candidates. For example, San Bernardino County Education posted the same teacher librarian position for a year before hiring a viable candidate. Similarly, Redlands Unified and San Juan Unified reported that they received only one or two credentialed applicants for recent teacher librarian openings. The Fresno program director and San José program coordinator also said that they have received numerous calls from school districts across the State looking for teacher librarians, but they have been unable to identify available candidates because the majority of teachers enrolled in their credentialing programs are already employed as teacher librarians on an emergency basis—a method for schools to temporarily fill teacher librarian positions with teachers who are generally pursuing their teacher librarian credentials. Because most teachers with emergency credentials already have jobs as teacher librarians, only a few of the graduating teacher librarians are available to fill new job offerings. As a result, districts and counties may be unable to employ teacher librarians even if they wish to do so.

*Because most teachers with emergency credentials already have jobs as teacher librarians, only a few of the graduating teacher librarians are available to fill new job offerings.*

***National Student-to-Teacher Librarian Ratios Have Increased, but California Continues to Lag Far Behind***

Since the State Education Board adopted the model standards in 2010, the national average that it used to establish its recommended ratio increased from 785 students per teacher librarian to 1,109 students per teacher librarian in fiscal year 2013–14—the year with the most recent national data available. Regardless of the changes in the national average, California still has by far the poorest ratio of students to teacher librarians in the nation. National data from fiscal year 2013–14 indicate California employed only one teacher librarian for every 8,091 students, while the state with the next poorest ratio, Idaho, employed one teacher librarian for every 5,533 students. Table 5 on the following page shows California’s ranking compared to the next four most populous states. Taken together, the population of these five states accounted for 38 percent of the nation’s public school students in fiscal year 2013–14.

School districts in other states appear to place a higher value on the services offered by teacher librarians than do the districts in California. As Table 5 shows, each of the other states we reviewed employed more teacher librarians per student than California. In addition, the largest school districts within two of those states provide greater monetary incentives to their teacher librarians than the largest California school district—Los Angeles Unified. As described previously, the school districts we visited in California do not provide significant monetary incentives to their teacher librarians.

**Table 5**  
**Comparison of Student-to-Teacher Librarian Ratios for**  
**the Five Most Populous States**  
**Fiscal Year 2013–14**

STATE	NUMBER OF STUDENTS	STUDENT-TO-TEACHER LIBRARIAN RATIO	NATIONAL RANKING
New York	2.7 million	1,089 to 1	32
Texas	5.2 million	1,119 to 1	34
Florida	2.7 million	1,277 to 1	36
Illinois	2.1 million	1,442 to 1	43
California	6.3 million	8,091 to 1	50

Source: U.S. Department of Education's National Center for Education Statistics, Fiscal Year 2013–14 data.

School districts in California may find it difficult to afford a student-to-teacher librarian ratio similar to that of other states because California spends less than the nationwide average per student, even though the cost of living in California is generally higher than that of most other states. According to the most recent nationwide data, California spent \$9,595 per student in fiscal year 2013–14, an amount somewhat below the national average of \$11,009 and far below the \$20,610 per student New York spent, even though the cost of living in California and New York is comparable. Further, Illinois, which has a cost of living near the national average, managed to spend \$13,077 per student, roughly 36 percent more than California. The lack of financial support may, in part, hinder school districts from employing and retaining more teacher librarians.

In addition, some states have laws that require school districts to employ teacher librarians based on school size or grade level, which creates a demand for teacher librarians within those states. According to one study, states with the best ratios of students to teacher librarians tend to have state mandates to employ teacher librarians. For example, New York has a state mandate requiring the employment of full-time teacher librarians. Specifically, it requires one full-time teacher librarian per 1,000 students in each secondary school. By establishing a mandate on the staffing of teacher librarians, some states have demonstrated that they value library services as a fundamental part of education. Unless California's state and local decision makers demonstrate that they place an equally high value on library services, the State's employment of teacher librarians will likely continue to trail the rest of the nation.

## Recommendations

To ensure that students receive a level of library services that better aligns with the model standards, the Legislature should do the following:

- Define the minimum level and types of library services that schools must provide.
- Broaden the authority of Teacher Credentialing and the county offices of education to address classified staff who perform duties that require certification.

To strengthen their library programs and help the State assess the condition of school libraries statewide, Redlands Unified, San Juan Unified, and Woodlake Unified should do the following:

- Ensure that teacher librarians are involved in the selection of library materials at each school.
- Consider ways to leverage the teacher librarians they already employ to offer a broader range of services to all grade levels.
- Use the model standards to assess the needs of their school library programs and address any identified needs during their LCAP process.
- Require their schools to participate in Education's annual school library survey.

To strengthen school library programs in their counties and help school districts comply with state law, the Sacramento, San Bernardino, and Tulare county offices of education should provide guidance to their school districts on using teacher librarians for the provision of library services, completing Education's annual school library survey, and identifying the needs of their school library programs by using the model standards as part of their LCAP process.

To strengthen its monitoring of staff assignments, Teacher Credentialing should work with Education to identify potential misassignments by comparing annually the staffing information reported by school districts to Education against Teacher Credentialing's credentialing records. Further, Teacher Credentialing should incorporate misassignments identified using Education's data into its existing notification, reporting, and sanctioning structure. If Teacher Credentialing believes it needs express statutory authority to do so, it should seek it.

To better understand the condition of school libraries statewide and to raise stakeholders' awareness of the State Education Board's adopted model standards, Education should do the following:

- Redesign its annual school library survey to solicit answers that will better help Education determine whether schools are implementing the model standards and better assess the type and extent of library services the schools provide.
- Use its directory of school districts to notify administrators about the annual school library survey and remind them that participation is mandatory.
- Work with the State Education Board to incorporate consideration of all academic content and performance standards adopted by the State Education Board into the tools that guide the LCFF process, including but not limited to the LCAP template, the evaluation rubrics, and publicly funded LCFF/LCAP trainings, such as those offered by the California Collaborative for Educational Excellence.
- Work with Teacher Credentialing to assist it in identifying potential misassignments by providing staffing information reported by school districts to Teacher Credentialing by April of each academic year.
- Identify school districts that reported employing significantly fewer teacher librarians in fiscal year 2015–16 than in previous years and verify the accuracy of their fiscal year 2015–16 reports.

We conducted this audit under the authority vested in the California State Auditor by Section 8543 et seq. of the California Government Code and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the Scope and Methodology section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,



ELAINE M. HOWLE, CPA  
State Auditor

Date: November 17, 2016

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For questions regarding the contents of this report, please contact Margarita Fernández, Chief of Public Affairs, at 916.445.0255.

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CALIFORNIA  
DEPARTMENT OF  
EDUCATION

**TOM TORLAKSON**  
STATE SUPERINTENDENT OF PUBLIC INSTRUCTION

October 27, 2016

Elaine M. Howle, State Auditor\*  
California State Auditor  
555 Capitol Mall, Suite 300  
Sacramento, CA 95814

Subject: "School Library Services: Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services," Report No. 2016-112, November 2016

The California Department of Education (Education) appreciates the opportunity to comment and provide proposed corrective actions to the recommendations outlined in the California State Auditor's (CSA) Audit Report No. 2016-112, titled: "School Library Services: Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services."

### Overall Comments

To provide better perspective to the CSA's audit, Education has the following overall comments related to the auditors' fieldwork and reporting.

*Comment 1: Information and Data Requests* – Although Education questioned the auditors need for student-level information, including school enrollment, demographic, program participation, and course enrollment information, the auditors insisted on obtaining this information without a defined objective or purpose. To meet the CSA's short timeframes and demands, Education reprioritized assignments to complete their requests. In addition, it was necessary for Education to have numerous phone calls and e-mails with the CSA to help them gain an understanding of how to review the data provided. Based on the audit report text, it appears that this extensive information request was neither necessary or within the audit scope and objectives. ①

*Comment 2: Negative-Biased Text* – Throughout the report, the auditors made statements with negative connotations regarding Education's data collection processes without providing the appropriate context. For example, the auditors did not report the fact that changes to the data collection process were made to directly improve the data quality for librarians and other staffing information, after concerns were raised by School Library Advocates. Instead, the auditors reported only narrow limitations of and within the data collection process. ②

\* California State Auditor's comments begin on page 43.

Elaine M. Howle, State Auditor  
October 27, 2016  
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### Recommendation No. 1:

To better understand the conditions of school libraries statewide and to raise stakeholders' awareness of the State Education Board's adopted model standards, Education should do the following:

- Redesign its annual school library survey to solicit answers that will better help Education determine whether schools are implementing the model standards and better assess the type and extent of library services the schools provide.

#### Education's Comments and Corrective Actions

Concur. Education is revising and updating the school library survey to incorporate the *California Model School Library Standards (MSLS)*. Once finalized, the revised and updated school library survey will allow Education to better assess the type and extent of library services provided. Education plans to launch the revised survey by January 2017.

- Use its directory of school districts to notify administrators about the annual school library survey and remind them that participation is mandatory.

#### Education's Comments and Corrective Actions

Concur. Education will utilize the directory of school districts to notify school officials about the annual school library survey and the mandated requirement to participate. A copy of the *MSLS* will be sent to each district in California, with a letter from Education's Deputy Superintendent of the Instruction, Learning Support and Standards Branch, to: (1) introduce the standards; (2) explain the *Education Code (EC)* defining library programs; and (3) inform them of *EC 18122*, mandating local governing boards to report annually to Education on the condition of their library programs.

- Work with the State Education Board to incorporate consideration of all academic content and performance standards adopted by the State Education Board into the tools that guide the LCFF process, including but not limited to the LCAP template, the evaluation rubric, and publicly-funded LCFF/LCAP trainings, such as those offered by the California Collaborative for Educational Excellence.

#### Education's Comments and Corrective Actions

Concur. Education will inform and advise the State Board of Education (SBE) and the California Collaborative for Educational Excellence (CCEE) of the CSA's recommendation and discuss the feasibility of incorporating consideration of all content and performance standards adopted by the

Elaine M. Howle, State Auditor  
October 27, 2016  
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SBE into tools that guide the LCFF process. However, both the SBE and CCEE are separate agencies who do not operate under the authority or direction of Education.

At its November 2016 meeting, the SBE will consider adoption of a revised LCAP template (<http://www.cde.ca.gov/be/ag/ag/yr16/agenda201611.asp>). The instructions included in the proposed revised LCAP template identifies the state priorities which must be addressed in the LCAP. As revised, the proposed LCAP template will specifically list the academic content and performance standards, including the Model School Library Standards, as part of the instructions for the LCAP template.

Currently, the LCAP template requires LEAs to describe their annual goals, and the actions they will take to achieve those goals, for all students for each state priority. Implementation of the academic content and performance standards adopted by the SBE is one of the state priorities for which an LCAP must include goals and related actions (a list of the standards may be accessed on Education's website at <http://www.cde.ca.gov/be/st/ss/>). The LCFF Frequently Asked Questions (FAQs) posted on Education's website directs LEAs to include goals and actions in their LCAP to address academic content and performance standards. The FAQ specifically identifies the standards, including the Model School Library Standards.

In addition, the SBE's development of the LCFF evaluation rubric includes a concise set of state indicators and local performance indicators that reflect LCFF priorities and statements of model practices. Furthermore, based on the SBE's action at its July 2016 meeting, there will be the following local performance indicators in the initial phase of the evaluation rubrics related to LCFF priorities:

- Appropriately Assigned Teachers, Access to Curriculum-Aligned Instructional Materials, and Safe, Clean and Functional School Facilities (Priority 1);
- Implementation of State Academic Standards (Priority 2);
- Parent Engagement (Priority 3);
- School Climate, Local Climate Surveys (Priority 6);
- Coordination of Services for Expelled Students, County Offices of Education (Priority 9); and
- Coordination of Services for Foster Youth, County Offices of Education (Priority 10).

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- Work with Teacher Credentialing to assist it in identifying potential misassignments by providing staffing information reported by school districts to Teacher Credentialing by April of each academic year.

#### Education's Comments and Corrective Actions

④ Do not concur. The auditors fail to acknowledge that Education has long supported and has historically facilitated the exchange of data with the Commission on Teacher Credentialing (CTC) to assist with the monitoring of credential staff. Although Education annually provides staffing data to the CTC, the timing of this data sharing is based on other considerations not acknowledged by the auditors, such as California Longitudinal Pupil Achievement Data System (CALPADS) reporting requirements and priorities. Education's first priority in the annual data collection and reporting process for the use of CALPADS data is to ensure that enrollments are complete, which drives the funding allocations to local educational agencies. Education then shifts the priority of processing data to federal and state reporting requirements. In addition, legal requirements imposed on Education, as set forth by *D.J. v. State of California et al* (Los Angeles Superior Court No. BS142775, Second District Court of Appeal No. B260075 - 2013), and a related complaint from the U.S. Department of Justice, require reporting of specific information at certain periods annually.

Furthermore, the auditors do not acknowledge the intent and commitment that Education has towards acquiring and providing accurate credential staff information. For example, Senate Bill (SB) 1614 (Chapter 840, Statutes of 2006), and the 2006 Budget Act, Item 6110-101-0890, provision 43 (Assembly Bill 1801, Chapter 47, Statutes of 2006), authorized the implementation of the California Longitudinal Teacher Integrated Data Education System (CALTIDES). The purpose of CALTIDES is to automate, to the extent feasible, the monitoring of credentialed staff working in the California public schools through integration of data from the California Longitudinal Pupil Achievement Data System (CALPADS) and the credentialing data maintained by the Commission on Teacher Credentialing (CTC). In both the 2010–11 and 2011–12 budget acts, Governor Arnold Schwarzenegger and Governor Jerry Brown eliminated the use of federal funding for the CALTIDES project. In the summary for the 2011–12 enacted Budget Act, it states that while "CALTIDES was intended to provide a statewide longitudinal teacher database that would serve as the central state repository of information regarding the teacher workforce; however, this data system is not a critical need." Accordingly, Education was required to return the multi-million dollar federal grant that was intended to develop and implement CALTIDES. Consequently, consistent with the Governor's action, Education has not made any changes to CALPADS to

Elaine M. Howle, State Auditor  
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enable such monitoring and has not attempted to use CALPADS data for any assignment monitoring purposes.

In addition, the annual budget act language related to CALPADS funding states, "As a further condition of receiving these funds, the SDE (State Department of Education) shall not add additional data elements to CALPADS, require local educational agencies to use the data collected through the CALPADS for any purpose, or otherwise expand or enhance the system beyond the data elements and functionalities that are identified in the most current approved Feasibility Study and Special Project Reports and the CALPADS Data Guide v4.1." Therefore, in the absence of CALTIDES, Education instituted a manual process to annually share staffing data with the CTC. However, due to the unavailability of complete and final data that CTC would utilize to make corrections in the current academic year, it would not be feasible or realistic to report to the CTC by the month of April of each year.

⑤

- Identify school districts that reported employing significantly fewer teacher librarians in fiscal year 2015/16 than previous years and verify the accuracy of their fiscal year 2015-16 report.

#### Education's Comments and Corrective Actions

Concur. Education will review the relevant CALPADS data submitted and certified by LEAs and identify those with a significant decline in staffing than the prior year. Based on a review of comparison data, Education will determine if it would be necessary to contact the school districts to follow up and verify the accuracy of the data. In addition, on October 18, 2016, in the semi-annual Webinar to CALPADS LEA users, participants were reminded of the importance of accurately reporting School Librarian data (<https://csis.fcmat.org/Pages/October-18-2016-CALPADS-Information-Meeting.aspx> - slide 73).

If you have any questions regarding Education's comments or corrective actions, please contact Kevin W. Chan, Director, Audits and Investigations Division, by e-mail at [kchan@cde.ca.gov](mailto:kchan@cde.ca.gov).

Sincerely,



Michelle Zumot  
Chief Deputy Superintendent of Public Instruction

MZ:kl

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## Comments

### CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE CALIFORNIA DEPARTMENT OF EDUCATION

To provide clarity and perspective, we are commenting on the California Department of Education's (Education) response to our audit. The numbers below correspond to the numbers we have placed in the margin of Education's response.

As we state on page 13, audit objective 4 was to determine whether the number of credentialed teacher librarians is insufficient based on available indicators and to determine what factors contribute to the shortage. For example, we present student-to-teacher librarian ratios and student enrollment information by location on page 28. In fact, we engaged in several conversations with Education representatives explaining the need for the requested data and pointed out this specific audit objective to them.

①

Audit standards require that we obtain sufficient and appropriate evidence to support our audit findings, conclusions, and recommendations. As such, we required Education's assistance during the course of the audit.

②

Education states that we did not report its reasons for making changes to its data collection process; however, we included the explanation of Education's deputy superintendent of the District, School, and Innovation Branch (branch deputy) on page 26. The branch deputy stated that Education changed its way of collecting data at the request of teacher librarians who wanted to be categorized as teachers who teach specific courses, rather than as staff providing pupil services. Given the large decrease in the number of teacher librarians that school districts reported in fiscal year 2015-16, Education's changes did not improve the data quality for librarians.

③

Education is incorrect in its assertion. As described on page 22, we indicate that Education has provided staffing information to the Commission on Teacher Credentialing (Teacher Credentialing) since fiscal year 2010-11. Further, we consulted with Education to determine that April was a reasonable time frame for Education to provide Teacher Credentialing the staffing information each year.

④

We disagree with Education's assertion that it is not feasible or realistic to provide staffing information to Teacher Credentialing by April of each year, as we determined this time frame based on Education's input and estimation that it could complete this task

⑤

between March and May. To the extent that Education now believes that April is no longer feasible, we look forward to its identification of an annual time frame it can meet in its 60-day response to our audit.



## **Commission on Teacher Credentialing**

1900 Capitol Avenue Sacramento, CA 95811 (916) 322-6253 Fax (916) 445-0800 www.ctc.ca.gov

Office of the Executive Director

October 27, 2016

Elaine M. Howle\*  
State Auditor  
Bureau of State Audits  
555 Capitol Mall, Suite 300  
Sacramento, California 95814

Dear Ms. Howle:

Commission staff have reviewed the findings of the state auditor report titled, ***School Library Services: Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services***. We greatly appreciate the department's support and thoughtful dialogue in working with the Commission in putting the final draft report together.

### **Introduction**

The Commission's core mission is to ensure integrity, relevance, and high quality in the preparation, certification, and discipline of the educators who serve all of California's diverse students. The Commission recognizes and promotes excellence in the preparation and practice of California's education workforce. The agency also values equity, quality, inclusiveness and diversity in standards, programs, practices, people and the workplace and is dedicated and committed to the education and welfare of California's diverse students.

We appreciate that the findings in this report help to support and respect the mission of the Commission and work to help ensure that qualified teachers are in place throughout our school districts and libraries.

### **Response to Audit Findings**

Below you will find the Commission's comments and clarifications to the findings provided in the final draft report.

### **Level of Service**

The following statements can be found on pages 4 and 24 of the draft report:

"Although the State's Commission on Teacher Credentialing (Teacher Credentialing) has issued guidance that this practice is one way to comply with state law, schools that obtain services in this way are unlikely to provide as many library services to their students and teachers as schools that employ their own teacher librarian." (Page 4)

"Although the California Commission on Teacher Credentialing (Teacher Credentialing) issued guidance that this practice is one way to comply with state law, schools that obtain services in this manner are unlikely to provide as many library services to their students and teachers as schools that employ their own teacher librarians." (Page 24)

\* California State Auditor's comments appear on page 49.

*Commission's Response:* The Commission has issued this non-binding guidance in an effort to be helpful, but the responsibility to monitor the level of service is not within the Commission's authority. The Commission provides information on all legal assignment options for employers and a library contract is one of the legal options.

### **Misassignments**

The following statements can be found on pages 5 and 28 of the draft report:

"However, Teacher Credentialing [REDACTED] stated that they did not identify this activity as an inappropriately staffed position, referred to as a misassignment, because they lack the authority to monitor the assignments of classified staff." (Page 5)

- ② "However, state law gives Teacher Credentialing broad authority to ensure competence in the teaching profession and establish sanctions for the misuse of credentials and misassignment of credential holders. We therefore believe that Teacher Credentialing should continue to obtain this staffing information from Education and begin using it to identify and follow up on potential misassignments using its existing authority." (Page 28)

*Commission's Response:* Because there was a contract in place and the Commission does not monitor the level of service, the contract satisfies the requirement. The Commission does not have authority to monitor non-certificated individuals.

### **Material Selection**

The following statement can be found on Table 3 on page 22 of the draft report:

The asterisk states that "...schools use principals or library staff to select materials, a service the Commission on Teacher Credentialing only authorizes teacher librarians to provide."

*Commission Response:* The regulations specify that teacher librarians select materials for school or district libraries. The 'select materials' in the footnote to the table could be misunderstood to be any materials and the regulation is specific to materials for the school or district library. This footnote would be more accurate if it stated: ...schools use principals or library staff to select materials for the district or school library, a service that the Commission on Teacher Credentialing only authorizes teacher librarians to provide.

### **Response to Recommendation**

Below is the Commission's response to the report recommendation as it relates to the agency.

**To strengthen its monitoring of staff assignments, Teacher Credentialing should work with Education to identify potential misassignments by comparing annually the staffing information reported by school districts to Education against Teacher Credentialing's credential records. Further, Teacher Credentialing should incorporate the identified misassignments into its existing notification, reporting, and sanctioning structure.**

*Commission Response:* Staff agrees that using the CDE data could help sharpen the process of identifying misassignments and could allow assignments to be monitored annually rather than once every four years.

Again, we thank and appreciate the Auditor's willingness to work with us in formulating the final draft of this report. We look forward to the release of the final report and working towards implementing the recommendations put forth in order to continue supporting teachers and students in California. Please contact us with any other questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Mary Vixie Sandy".

Mary Vixie Sandy, Ed.D.  
Executive Director

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## Comments

### CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE COMMISSION ON TEACHER CREDENTIALING

To provide clarity and perspective, we are commenting on the Commission on Teacher Credentialing's (Teacher Credentialing) response to our audit. The numbers below correspond to the numbers we have placed in the margin of Teacher Credentialing's response.

While preparing our draft report for publication, some page numbers shifted. Therefore, the page numbers Teacher Credentialing cites in its response do not correspond to the page numbers in our final report.

Teacher Credentialing incorrectly cites the statement from page 22, which relates to certificated staff, in discussing the monitoring of classified staff. As we state on page 22, we believe that Teacher Credentialing has the authority to use California Department of Education's data on employed teachers to identify the misassignment of certificated individuals.

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# Redlands Unified School District

## Educational Services Division

P.O. Box 3008 • Redlands, California 92373-1508 • (909) 307-5300 • FAX (909) 307-2489

October 27, 2016

Andrew Lee  
Team Leader  
California State Auditor \*  
621 Capitol Mall, Suite 1200  
Sacramento, CA 95814

### **RE: Report Number 2016-112 – School Library Services**

Dear Mr. Lee:

The following is the Redlands Unified School District's ("District") response to the State Auditor's findings and recommendations received by us on October 21, 2016.

Redlands Unified School District is committed to ensure students are college, career, and life ready. Our mission is clear in that our students will be empowered with the knowledge and commitment necessary to confront the challenges of our changing world as they become the leaders of the 21<sup>st</sup> century. It is the District's desire to produce technology-competent individuals who can transform information into knowledge, think critically, and nurture lifelong learning. This is achieved by the District's practice of continual school improvement on a regular basis.

Please find below our responses to the State Audit Report 2016-112.

#### **Recommendation No. 1**

Ensure that teacher librarians are involved in the selection of library materials at each school.

#### **Response to Recommendation No. 1**

*The District agrees with this recommendation as it relates to the operations of the Redlands Unified School District elementary schools, and will take actions to address this recommendation, including:*

- *The District will ensure that library purchases at the elementary level be vetted through the teacher librarian assigned to the elementary schools.*

#### **Recommendation No. 2**

Consider ways to leverage the teacher librarians they already employ to offer a broader range of services to all grade levels.

#### **Response to Recommendation No. 2**

*The District agrees with this recommendation and has already taken steps to address this recommendation, including:*

- *The District has designated each teacher librarian to support specific elementary sites to guarantee support at the TK – 5 grade level.*

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**"Excellence In Education"**

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\* California State Auditor's comment appears on page 53.

Page 2  
Report Number 2116-112  
School Library Services

- *The District has scheduled quarterly Teacher Librarian/Instructional Paraprofessionals meetings to ensure mentorship, collaboration, and regular communication to increase services to all grade levels.*

**Recommendation No. 3**

Use the model standards to assess the needs of their school library programs and address any identified needs during their LCAP process.

**Response to Recommendation No. 3**

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*The District disagrees with this recommendation to the extent the audit concludes the Redlands Unified School District analyzed the common state standards to the model library standards in isolation. As such, the report indicates that the district provided an ‘analysis showing that several of the model standards goals align with those of the State’s common core standards.’ In fact, the in-depth analysis completed by the District demonstrated how the District’s program, outlined in the District’s Scope & Sequence for K-12 (which includes adopted curriculum aligned to common core standard), incorporated a great percentage of the model standards. A sampling analysis was completed for grades 3, 8, and 12. The model standards are covered in 77% of the 3<sup>rd</sup> grade Scope and Sequence; 85% of the 8<sup>th</sup> grade Scope and Sequence; and 85% of the 12<sup>th</sup> grade Scope and Sequence. The purpose of the analysis was to demonstrate how the District examines its local needs for the LCAP by analyzing data of student achievement stemmed from a robust and comprehensive K-12 Scope and Sequence, which includes much of the model library standards.*

*Further, the District understands the purpose of the LCAP is to “reflect a simple, yet complete story of needs, goals, services, and investments that will have positive outcomes for students. It is intended to be flexible, allowing for resource allocation choices that align to local needs. It is the vehicle to pursue what is needed based on locally determined priorities and needs.” The LCAP process determines the needs that are to be addressed within the LCAP budget and document. The information found across sections of the District’s LCAP provides an accessible story about the needs, approach, and investments the District is making to support success for all students. As a result, there are numerous specific components in the District’s LCAP that address the model standards.*

**Recommendation No. 4**

Require their schools to participate in Education’s annual school library survey.

**Response to Recommendation No. 4**

*The District agrees with this recommendation as it relates to the operations of the Redlands Unified School District. The District will participate in the school library survey, and asks that the information pertaining to this survey be emailed to Miki Inbody, Assistant Superintendent, Educational Services Division at [miki\\_inbody@redlands.k12.ca.us](mailto:miki_inbody@redlands.k12.ca.us) In this way, the survey will be dispersed as a mandatory requirement, and all school site administrators will be advised accordingly.*

Sincerely,



Lori Rhodes  
Superintendent of Schools

LR:pv

## Comment

### CALIFORNIA STATE AUDITOR'S COMMENT ON THE RESPONSE FROM THE REDLANDS UNIFIED SCHOOL DISTRICT

To provide clarity and perspective, we are commenting on the Redlands Unified School District's (Redlands Unified) response to our audit. The number below corresponds to the number we have placed in the margin of Redlands Unified's response.

We stand by our recommendation on page 33 that Redlands Unified should use the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards) to assess the needs of their school library programs and address any identified needs during the local control accountability plan process. Redlands Unified states that its analysis shows the model standards are covered in 85 percent of the grade 12 Scope and Sequence; however, its analysis is limited to the 13 overarching standards that continue across all grade levels. As we state on pages 9 and 10, the model standards consist of smaller, more specific objectives that students should achieve by the end of a specified grade level or grade span, such as the span of grades nine through twelve in high school. As we note on page 23, the common core standards' goals overlap with fewer than half of the model standards' 64 goals for students in grades nine through 12. In addition, the model standards provide other specific guidance related to library services that is not included in the common core standards, such as goals related to library staffing and resources, which Redlands Unified did not address in its analysis.

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# Sacramento Office of Education County

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David W. Gordon  
Superintendent

October 27, 2016

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*Via Electronic Mail to AndrewL@auditor.ca.gov*

Elaine M. Howle, CPA\*  
California State Auditor  
621 Capitol Mall, Suite 1200  
Sacramento, CA 95814

Re: School Library Services Audit

Dear Ms. Howle:

The Sacramento County Office of Education (SCOE) has received your draft school library services audit report. We appreciate your staff's work on this audit and your invitation to respond to the audit recommendation involving SCOE. Our response is below.

### Recommendation

"To strengthen library programs in their counties and help school districts comply with the law, the county offices of education in Sacramento County, ...should provide guidance to their school districts on using teacher librarians for the provision of library services, completing Education's annual survey, and identifying the needs of their school library programs by using the model standards as part of their LCAP process." (Pages 9, 41-42)

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### SCOE Response

The draft audit report finds that "the law does not clearly define required library services or establish a means for ensuring their provision" and "state law does not specify the minimum level of library services school districts must provide." (Page 19) Therefore, we understand that the recommendation above is not intended to suggest that county offices of education are out of compliance with existing law, but rather to suggest practices that you believe would strengthen library programs and assist school districts if implemented.

The final unredacted audit report is not yet available. Nevertheless, our initial reflection is that to increase library services, school districts will not need additional guidance. They will need additional resources. This lack of resources is referenced in your draft report and highlighted by your comparison of California's education expenditures with those in other

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\* California State Auditor's comments appear on page 57.



Elaine M. Howle, CPA  
October 27, 2016  
Page 2

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states, however, the recommendation seems to suggest that more library services will occur when there is more guidance. Similarly, the title of the report – “School Library Services: Vague Laws and Lack of Monitoring Allow School Districts to Provide a Minimum Level of Library Services” – suggests that more specific state laws and increased monitoring could increase the level of library services. California’s underfunded education system is a zero sum situation – without additional resources, more library services will result only from a corresponding loss in other important programs, such as arts, civics, etc.

SCOE is committed to helping Sacramento’s nearly one-quarter million K-12 students receive quality education services. Therefore, once we have had an opportunity to review the final unredacted audit report and the practices upon which it is based, we will consider and determine whether additional guidance to our school districts will assist in strengthening school library programs in the county.

Thank you for your time and consideration. If you have questions or need additional information, please let us know.

Sincerely,



David W. Gordon  
Sacramento County Superintendent of Schools

DWG/TS/mr

## Comments

### CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE SACRAMENTO COUNTY OFFICE OF EDUCATION

To provide clarity and perspective, we are commenting on the Sacramento County Office of Education's (Sacramento County Education) response to our audit. The numbers below correspond to the numbers we have placed in the margin of Sacramento County Education's response.

While preparing our draft report for publication, some page numbers shifted. Therefore, the page numbers Sacramento County Education cites in its response do not correspond to the page numbers in our final report.

Sacramento County Education states that school districts will not need additional guidance to increase library services. As we state on page 24, school districts may be unaware that the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards) are one of the State's recommended academic content and performance standards. As a result, some districts may fail to identify the needs of their school library programs and allocate resources accordingly. In addition, as we note on page 21, a school district we visited in Sacramento County had principals or classified staff perform certain activities that require a certificated teacher librarian. Thus, we believe that school districts could benefit from receiving additional guidance on using teacher librarians for the provision of library services. Finally, as we note on page 26, less than half of the schools in Sacramento County responded to the California Department of Education's annual library survey. As a result, school districts could benefit from additional guidance to improve their participation in this mandatory survey.

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Ted Alejandre  
County Superintendent

October 27, 2016

Ms. Elaine M. Howle, CPA\*  
California State Auditor  
621 Capitol Mall, Suite 1200  
Sacramento, CA 95814

Dear Ms. Howle:

Thank you for your interest in library services for California's public schools. This letter is a formal response to the draft audit report ("Report") *"School Library Services: Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services"* presented to the San Bernardino County Superintendent of Schools (SBCSS) on October 21, 2016.

As the draft Report indicates, the State Board of Education adopted Model School Library Standards for K-12 students in 2010. Additionally, state law requires school districts to provide library services, but does not clearly define library services and does not require school districts to directly employ teacher librarians to provide such services. The Report also clearly acknowledges that there is no legal requirement for county offices of education to support districts in the provision of library services (pg. 24).

With that being said, on page 19 of the Report, the words "do little" suggest that there is some oversight responsibility for state and county offices to monitor library services that is being shirked, when in fact, county offices of education have no such authority (except to monitor staff assignments and credentialing of teacher librarians), yet provide an array of supports.

Page 26 of the report indicates that the state and counties "are not ensuring" a minimum level of library service is being provided...." The primary character of county offices of education is that of support, however the text does not acknowledge the extent or nature of the support provided. San Bernardino County is actually doing plenty to support the use of libraries at the school, district, city, and county level.

The SBCSS provides coordinated outreach and assistance to support school library services in the 33 school districts in San Bernardino County, as well as coordinating and aligning resources with the San Bernardino County librarian to provide access to library services and resources to educators, students and families throughout the county. Because the ability to read by third grade is one of the greatest indicators of a child's future academic performance and success in life, our countywide Library Collaborative of school and community libraries share multiple programs and resources, and a wealth of professional capacity to promote and increase family literacy and the reading proficiency of students.

Just some of the initiatives and key actions taken include:

- Establishing a countywide Vision2Read initiative and literacy campaign as part of the Countywide Vision's Cradle to Career Roadmap and collective impact efforts with school districts, county government, business, community- and faith-based organizations, and students and families;

Office of the Superintendent

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\* California State Auditor's comments begin on page 63.

October 27, 2016

Page 2

- Supporting the “Reading by Third Grade” milestone of the Cradle to Career Roadmap by promoting a cohesive literacy message to students, families, staff and stakeholder groups countywide;
- Forming new collaborative effort between the SBCSS and the County Library System to promote student literacy and provide access to library-rich resources through the county library system’s 32 branches and school libraries at more than 550 public schools in the county’s 33 school districts;
- Convening the SBCSS’ Media Library Education Network(MLEN) to support districts across the county in raising the level of effective use of libraries and re-establishing their role in student education from a period when districts struggled to keep their library doors open or staffed; (While MLEN is mentioned on page 25 of the report, this countywide network is inaccurately described as, “...a number of training workshops.”)
- Hosting the annual Family Reading Rally, supporting early literacy in homes, communities and schools by holding family/parent literacy workshops and providing free books to students and families who attend the event;
- Coordinating a countywide summer reading program with county, city and school libraries resulting in a 28 percent increase in the number of children and adults participating in summer reading programs this year;
- Encouraging adoption of September as National Reading Month by municipalities and governance bodies throughout the county;
- Expanding opportunities to deliver research-based literacy development to families and students through a multi-platform approach of digital and online resources, webinars and podcasts;
- Holding a countywide library conference for school librarians, library technicians, county and city librarians to share best practices and new library resources;
- Launching the Footsteps2Brilliance Mobile Technology Platform, an early literacy solution to increase reading proficiency and word bank knowledge of preschool age children in the county.

③ Given this alignment of resources and array of services offered, it is of concern that the report does not include examples of the extensive work that has taken place in San Bernardino County to build a network of library services and resources between school, city and county libraries.

④ With regards to the Model School Library Standards, it may be important to make clear that the Model School Library Standards are guidance, not required or a mandate. It should be noted that the ELA/ELD California State Standards include the same requirements that are in the library standards. In alignment with these standards, county offices of education provide tremendous amounts of professional and technical development for pre-K through 12 teachers, administrators and district leadership in how to guide students to “..learn how to transform isolated bits of information into knowledge, evaluate sources, and think critically” (pg. 3, Summary).

Teachers in all content areas are also required to provide exactly this learning both in the way of knowledge, and in applied activities and projects, as part of the Common Core State Standards.

October 27, 2016  
Page 3

It may be important for the recommendations of the Auditor to emphasize the nature of the Local Control Funding Formula (LCFF) and Local Control Accountability Plan (LCAP) guidelines, and of the State Board LCAP template (pg. 9 recommendation to make Library Standards “part of the LCAP Process,” and pg. 28-29, 31). Following the core principle of Governor Jerry Brown’s Local Control Funding Formula, the LCAP template is designed to ensure there is a balance of local control with assurances to see that state priority areas and content standards, and local district goals for student achievement, are being met. For example, page 16 of the Report points out that “under the current model, districts decide how best to spend school funding to meet their identified needs.” Among county offices of education statewide, SBCSS was the first to develop a model that provides a multi-faceted team of experts to support districts in the cross-development of their budgets and LCAPs, and to work collaboratively with districts in continuous improvement to meet both state requirements and local priorities.

Finally, the title of the report, *“School Library Services: Vague State Laws and a Lack of Monitoring Allow School Districts to Provide a Minimal Level of Library Services”* is concerning as it suggests that there is a mandated monitoring requirement that is not occurring and that districts desire to provide a minimal level of library services. Also, the tone of the Report, in its entirety, would lead one to infer that compliance requirements are not being met, yet there are no statutes or regulations to monitor compliance of library services. ②

While each school district and its local governing board ultimately hold responsibility for adopting their own local policies with regards to state and federal statute, and state adopted content standards, my office is committed to serving the districts in San Bernardino County with guidance, support and best practices concerning library services for students. There are many ways to increase library services and usage. The SBCSS has found that aligning resources in a countywide collective impact approach is enhancing the effectiveness of services to students and families. ⑤

I greatly appreciate your interest in and support of public education in San Bernardino County, our schools, students and staff. I look forward to working collaboratively and positively with the State Auditor on this matter to see that all of our students receive the best access to library services and opportunities to fulfill their greatest potential.

Sincerely,



Ted Alejandre  
San Bernardino County Superintendent

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## Comments

### CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE SAN BERNARDINO COUNTY SUPERINTENDENT OF SCHOOLS

To provide clarity and perspective, we are commenting on the San Bernardino County Superintendent of Schools' (San Bernardino County Education) response to our audit. The numbers below correspond to the numbers we have placed in the margin of San Bernardino County Education's response.

While preparing our draft report for publication, some page numbers shifted. Therefore, the page numbers San Bernardino County Education cites in its response do not correspond to the page numbers in our final report.

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San Bernardino County Education states that the report's title and tone would lead one to infer that there is a mandated monitoring requirement that is not occurring. However, as we note on pages 19 and 20, we identified no legal requirement that county offices of education support districts in the provision of library services and we determined that county offices of education do not have express authority to assess whether districts actually provide library services. Because county offices of education have no monitoring requirement related to library services and no authority to ensure the provision of those services, we noted that county offices of education do little to ensure a minimum level of library services is provided. As we state on page 21, students and teachers may receive library services from individuals who are not qualified to provide them because counties lack the authority to ensure that only certificated staff provide certain library services. Accordingly, on page 33 we recommend the Legislature broaden the authority of the county offices of education to address classified staff who perform duties that require certification. Further, on page 25 we identified a low school district response rate to Education's annual school library survey and on pages 22 to 24 we note weaknesses in school districts' consideration of the *Model School Library Standards for California Schools, Kindergarten Through Grade Twelve* (model standards) in their local control accountability plan (LCAP) processes.

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San Bernardino County Education states that page 20 of the report inaccurately describes its Media Library Education Network (MLEN); however, we do not specifically mention the MLEN anywhere in the report. In addition, San Bernardino County Education describes a variety of initiatives and actions it has taken related to literacy; however, these examples are generally outside of the scope of our audit objectives, which are specific to school library services and

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teacher librarians. To address the audit scope and objectives, we describe San Bernardino County Education's past employment of a roving teacher librarian on page 20. Although San Bernardino County Education discontinued the program, we credit it for contracting with a teacher librarian to conduct free training workshops for teacher librarians and classified staff.

- ④ San Bernardino County Education states that the English Language Arts/English Language Development California State Standards—part of the California Common Core State Standards—include the same requirements that are in the library standards. However, as we state on page 23, the common core standards' goals overlap with fewer than half of the model standards' 64 goals for students in grades nine through 12. In addition, the model standards provide other specific guidance related to library services that is not included in the common core standards, such as goals related to library staffing and resources. In addition, San Bernardino County Education states that it may be important to make clear that the model standards are guidance, not required or a mandate. However, we already note this fact on pages 10, 15, and 23.
- ⑤ San Bernardino County Education did not specifically address our recommendation related to strengthening school library programs in its county. However, San Bernardino County Education states that it is committed to serving its districts with guidance, support, and best practices concerning library services for students. Thus, we look forward to San Bernardino County Education's 60-day response to clarify the specific actions it is taking to provide guidance to its school districts regarding the use of teacher librarians, completion of the annual school library survey, and consideration of the model standards as part of the LCAP process.



## San Juan Unified School District

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Internet Web Site: [www.sanjuan.edu](http://www.sanjuan.edu)

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**Kent Kern, Superintendent of Schools**  
**Donna O'Neil, Ed. D., Associate Superintendent, Schools and Student Support**

October 27, 2016

Elaine M. Howle, CPA  
621 Capitol Mall  
Sacramento, CA 95814

Re: San Juan Unified School District Library Service Audit Report 2016-112

Dear Ms. Howle;

San Juan Unified School District is committed to providing high quality educational services and supports for students and families to ensure that each student is college, career and citizenship ready and graduates on time. We strongly believe in holding every student at our 63 schools to high expectations as outlined in state content and performance standards. We also strongly believe in providing the necessary services and supports to maximize each student's success. Our Local Control and Accountability Plan (LCAP) and the adopted district budget outline how we support our schools and students in reaching the identified goals.

Based upon the findings and recommendations in the School Library Service Audit Report, we will be reviewing San Juan's library services to identify how to support all of our students in developing information literacy and meeting standards in all other content areas. Staff has now been identified and assigned with specific responsibilities around support of teacher librarians and other library staff. Additionally, Board Policy 6163.1 Libraries/Media Centers, as well as the related Administrative Regulations, will be reviewed and updated during the 2016-17 school year using the California School Board Association's model board policy as a guide. Once in place this Board Policy will form the basis of improvement work in the area of library services.

Based on a review of current practices in relationship to the revised Board Policy and Administrative Regulations we will prioritize needs and allocate resources, as available, to strengthen library services within district schools. Revised processes which support increased services will be implemented. I am confident these changes will increase the library services for staff and students in San Juan Unified School District. Enclosed please find the responses to State Audit Report 2016-112.

Sincerely,

A handwritten signature in black ink, appearing to read "Donna O'Neil".

Donna O'Neil, Ed.D.  
Associate Superintendent of Schools and Support Services



## San Juan Unified School District

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**Kent Kern, Superintendent of Schools**

**Donna O'Neil, Ed. D., Associate Superintendent, Schools and Student Support**

### **Recommendation 1**

Ensure that teacher librarians are involved in the selection of library materials at each school

#### **Response**

San Juan Unified School District agrees with this recommendation. Identified district staff will facilitate collaboration among library staff across grade spans, drawing on the knowledge and expertise of teacher librarians to provide input in the selection of library materials for schools. Board Policy and Administrative Regulation 6163.1 will be reviewed and updated to increase guidance on the library material selection process. Once the new policy and regulations are in place, an ongoing process will be established and implemented to ensure compliance with the policy.

### **Recommendation 2**

Consider ways to leverage the teacher librarians that they already employ to offer a broader range of services to all grade levels

#### **Response**

San Juan Unified School District agrees with the recommendation and will support collaboration among all library staff to capitalize on the expertise and training of teacher librarians. Identified district staff will facilitate collaboration among library staff across grade spans, drawing on the knowledge and expertise of teacher librarians to guide the expansion of library services, especially at the elementary and middle school levels.

### **Recommendation 3**

Use the model standards to assess the needs of their school library programs and address any identified needs during their LCAP process

#### **Response**

San Juan Unified School District agrees with the recommendation. District staff will be assigned to support this process in collaboration with library staff across the district. The intent will be to deepen understanding of the model standards, to assess the extent to which the standards are being met, and to make recommendations on steps necessary to increase alignment with the model standards. This analysis will be considered during the LCAP revision, in order to prioritize needs and allocate resources, as available.

### **Recommendation 4**

Require their schools to participate in Education's annual school library survey

#### **Response**

San Juan's rate of completion of the most recent survey was 85.5%, the highest cited in the report. If the request for completion of the survey or notification of the survey comes to a district office employee it will be possible to get full participation. A designee will be assigned in future years to communicate about the survey and follow up to ensure full participation by district schools.

# Tulare County Office of Education

Committed to Students, Support and Service

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County  
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**Liberty Center/  
Planetarium &  
Science Center**  
11535 Ave. 264  
Visalia

October 27, 2016

Elaine M. Howle  
California State Auditor  
621 Capitol Mall, Suite 1200  
Sacramento, CA 95814

Dear Ms. Howle:

The Tulare County Office of Education appreciates the opportunity to respond to the recommendations outlined in California State Audit Report No. 2016-112.

Recommendation 1: *“should provide guidance to their school districts on using teacher librarians for the provision of library services.”*

Response: Tulare County Office of Education (TCOE) agrees with this recommendation and will continue to provide guidance to districts. Activities we have previously engaged in toward this end include the following: April 2016, TCOE’s Educational Resource Services library media supervisor presented at a regional Learning and Leadership Forum. The library media supervisor addressed the value and importance of employing a teacher librarian or contracting with Tulare County Office of Education for library services. In addition, the ERS library media supervisor’s office sends a monthly newsletter to contracting administrators and teachers promoting the services provided by the library media supervisor, and the print and digital resources available through the ERS library. Lastly, the library media supervisor has contacted school districts that do not employ a teacher librarian in an effort to encourage them to employ a teacher librarian for their district or to contract with Tulare County Office of Education for teacher librarian services and print and digital resources.

Recommendation 2: *“should provide guidance to their school districts on completing Education’s annual school library survey”*

Response: Tulare County Office of Education (TCOE) agrees with this recommendation and will continue to provide guidance to districts. Activities we will conduct to address this recommendation include the following: To address the low number of respondents, 23.2% of schools in Tulare County completed the survey for the 2014-2015, TCOE’s library media supervisor will take advantage of the March 13, 2017 bimonthly library paraprofessional meeting to support every attendee with completing the annual school library survey prior to the April 30, 2017 deadline. As was done in April 2016, she will craft a follow-up email in

# Tulare County Office of Education

*Committed to Students, Support and Service*

**Jim Vidak**  
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Center**  
6200 S. Mooney Blvd.  
Visalia

**Doe Avenue Complex**  
7000 Doe Ave.  
Visalia

**Liberty Center/  
Planetarium &  
Science Center**  
11535 Ave. 264  
Visalia

early April to send to both school administrators and library paraprofessional staff who have not yet completed the survey, encourage them to do so, and to offer her support in completing the survey.

Recommendation 3: *“should provide guidance to their school districts on identifying the needs of their school library programs by using the model standards as part of their LCAP process.”*

Response: Tulare County Office of Education (TCOE) agrees with this recommendation and will continue to provide guidance to districts. Activities we have previously engaged in toward this end include the following: April 2016, TCOE’s Educational Resource Services library media supervisor presented at a regional Learning and Leadership Forum. The focus of these ongoing forums is development of district’s Local Control Accountability Plans (LCAP.) The library media supervisor addressed the value and importance of employing a teacher librarian or contracting with TCOE for library services. Additionally, TCOE’s Educational Resource Services Library has a link on their website for administrators with information on: services provided by the ERS library, CDE’s adopted Model School Library Standards, the role of the school librarian in implementing Common Core State Standards, as well as research and statistics on the educational impact of strong school library programs. Lastly, Model School Library Standards training was provided to district and county school boards at our local School Boards Summit (Fall Institute 2015) so that informed decisions on LCAP expenditures related to library services could be made at the local level. These considerations will continue to be incorporated into TCOE’s individualized district LCAP development technical assistance provided by Martin Frolli, TCOE Leadership and Support Services Director.

If you have any questions regarding Tulare County Office of Education’s comments or actions, please contact Debra Lockwood, Library Media Supervisor, by email at [debral@tcoe.org](mailto:debral@tcoe.org), or by phone at 559-651-3042 ext. 3310.

Sincerely,



Charlene Stringham  
Assistant Superintendent, Instructional Services  
Tulare County Office of Education

**Drew S. Sorensen**  
Superintendent

**Glen Billington**  
Assistant Superintendent



**Board of Trustees**

Ralph Chapman    Joe Hallmeyer  
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George Sanchez

October 27, 2016

Elaine M. Howle \*

California State Auditor  
Capital Mall, Suite 300  
Sacramento, CA 95814

Dear Ms. Howle:

Woodlake Unified School District is committed to providing outstanding educational opportunities to all of its students with the goal of making a generational change within our community. We use the continuous improvement process as a means for achieving this goal. Literacy, including information literacy, is a critical component of our mission and is taught throughout the instructional day.

We currently contract with the Tulare County Office of Education for library services and will continue to do so. We will work with our Library consultant more closely as we move forward so our district can provide our students with every opportunity to have success during their K-12 experience and in their post-secondary endeavors. We understand that we live in an information age and that location and evaluation of information is critical to social and economic wellbeing.

In support of this effort, the district is working to provide our students with a device and access to filtered internet at home to level the playing field. We will utilize the model library standards as a lever as we implement changes to our instructional program that will maximize this investment.

Enclosed, please find our responses to the State Audit Report 2016-112.

Sincerely,

Drew Sorensen  
Superintendent

**Recommendation No. 1**

Ensure that Teacher Librarians are involved in the selection of library resources.

Woodlake Unified agrees with this recommendation.

Woodlake Unified will ensure that our school sites coordinate future library purchases with the teacher librarian at the Tulare County Office of Education. This includes utilizing the teacher librarian's suggested list and consulting with the teacher librarian prior to submitting an order for materials other than replacement titles.

**Recommendation No.2**

Consider ways to leverage the teacher librarians that we already employ to offer a broader range of services to all grade levels.

Woodlake Unified agrees with this recommendation.

Woodlake Unified utilizes the services of the Tulare County Office of Education's library services. District staff will meet with the Teacher Librarian at the end of each year to plan services for the following year to ensure students at each grade level have access to Library services that are based on the model standards with improvement over time as the goal.

**Recommendation No. 3**

Use the model standards to assess the needs of their school library programs and address any identified needs during the LCAP process.

- ① Woodlake Unified disagrees with this finding. The LCAP template does not specify that the model standards are required and stating that information in the frequently asked questions should be considered a mandate is unfair to districts.

In spite of our disagreement, Woodlake Unified will work with the teacher librarian at the Tulare County Office of Education to assess the implementation of the model standards at our school sites with continuous improvement as the goal. Training in the model standards for both classified library technicians, site administration, as well as teacher leaders will be included as part of the needs assessment. The district will work to include the model standards implementation into the LCAP process.

**Recommendation No. 4**

Require schools to participate in Education's annual school library survey.

Woodlake Unified agrees with this recommendation.

District staff will require each site administration to meet with library staff at their site to complete the survey and report the date and time of submission to the Assistant Superintendent.

## Comment

### CALIFORNIA STATE AUDITOR'S COMMENT ON THE RESPONSE FROM THE WOODLAKE UNIFIED SCHOOL DISTRICT

To provide clarity and perspective, we are commenting on the Woodlake Unified School District's (Woodlake Unified) response to our audit. The number below corresponds to the number we have placed in the margin of Woodlake Unified's response.

Woodlake Unified mischaracterizes our discussion of the model standards in relation to the local control accountability plan (LCAP) requirements. We state at page 22, although the California Department of Education identifies the *Model School Library Standards for California Public Schools, Kindergarten Through Grade Twelve* (model standards) as one of the State's academic content and performance standards, the LCAP template does not list any of the standards that school districts must address. We further conclude on page 23 that without additional guidance, school districts may not consider using the model standards during the LCAP process to identify weaknesses in their library programs and to develop goals to address those needs. We stand by our recommendation on page 33 that to strengthen their library programs school districts should use the model standards to assess the needs of their school library programs and address any identified needs during the LCAP process. Although Woodlake Unified indicates that it disagrees with our finding, it states that it will implement our recommendation.

①