

August 9, 2013

Dr. John B. King, Jr.  
Commissioner of Education  
New York State Education Department  
89 Washington Avenue  
Albany, NY 12234

**RE: Variance to provide equivalent library services in alternative ways**

Dear Commissioner King:

The New York City Department of Education ("DOE") respectfully requests a variance from Commissioner's Regulation §91.2 as it relates to the employment of school library media specialists at secondary schools, effective September 2013. This variance would allow DOE schools to provide equivalent library services to students at secondary schools in alternative ways, in addition to providing these services through a certified library media specialist as specified in §91.2.

The DOE recognizes the important role of libraries in providing instruction to students and staff in this information age. Libraries have transformed from functioning as card catalog repositories to serving, through the use of computers, as a gateway to providing a variety of instructional activities and resources to school communities. This shift in informational literacy has created a demand for greater flexibility in the delivery of library services.

The DOE proposes to provide equivalent library services for secondary schools subject to §91.2 through the following arrangements:

- Schools may provide library services without a library media specialist or a teacher assigned. Schools provide equivalent library services in alternative ways to fulfill each of the three domains of the *SLMPE Rubric*: teaching for learning, building the learning environment, and empowering learning through leadership (see [http://www.p12.nysed.gov/technology/library/SLMPE\\_rubric/](http://www.p12.nysed.gov/technology/library/SLMPE_rubric/)). Schools that are providing equivalent library services without a library media specialist or teacher assigned in 2013-14 and beyond will be required to submit a yearly report demonstrating the alignment of their library services to the *SLMPE Rubric* to the Office of Library Services for review and approval. This report will include the school's strategies for delivering the following to students and staff: instruction, professional development, development of and access to a library collection, literacy promotion, and general library program assistance.

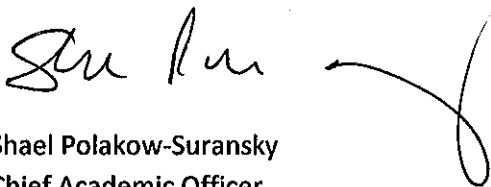
- Schools may provide library services by assigning a teacher who has received training from the DOE's Office of Library Services to the library. These teachers will be offered professional development and support from the DOE's Office of Library Services at the same level as certified library media specialists.
- Schools may employ a certified library media specialist that serves multiple schools sharing a campus. Because individual schools on a campus generally serve small student populations, shared library space and library media specialists can support library service delivery across the campus.

In addition, the DOE is taking the following steps to increase the number of highly qualified school librarians. These steps include:

1. Communicating with cluster, network, and school leaders regarding the state regulations on library staffing;
2. Supporting school leaders in developing effective library services and utilizing the school librarian;
3. Encouraging teachers to become fully certified library media specialists, and supporting these efforts by providing teachers to opportunity to apply for a grant from the Institute of Museum and Library Services (IMLS) in partnership with Syracuse University;
4. Allowing principals to request an exemption from the DOE hiring freeze to hire qualified library media specialists from outside of the DOE; and
5. Encouraging small schools to share the cost of a library media specialist.

The DOE realizes the importance of the school library program and appreciates your consideration of this request. This variance will provide the needed flexibility to focus our work on improving the school's instructional program and strengthening the basic library services afforded to all students that attend our schools.

Sincerely,



Shael Polakow-Suransky  
Chief Academic Officer