



OKLAHOMA STATE  
DEPARTMENT *of* EDUCATION

**MEMORANDUM**

**TO:** The Honorable Members of the State Board of Education

**FROM:** Ryan Walters

**DATE:** November 21, 2024

**SUBJECT:** Deregulation for Library Media Services

The following School is requesting deregulation for the 2024-2025 school year in order to provide library services to their students by an alternative means. Approval is recommended.

| County   | District | Regulation  | Alternative Means  |
|----------|----------|---|--|
| Seminole | Seminole | OAC 210:35-5-71<br>OAC 210:35-7-61<br>OAC 210:35-9-71 | Use a full-time certified librarian and an assistant serving the Early Childhood Center and Lower Elementary sites. A full-time certified librarian at the Intermediate site and a full-time certified librarian and an assistant serving our High School and Middle School. |

\* The number in the County category represents the Congressional District.  
See the attached map.

LJ/sh

Attachments

## 210:35-5-71. STAFFING.

The school shall provide staffing for the media program through one of the following arrangements:

### (1) OPTION A.

#### ENROLLMENT

#### QUALIFIED SPECIALIST REQUIRED

Fewer than 300

At least a half-time certified library media specialist (librarian)

300 to 499

At least one full-time certified library media specialist (librarian) or a half-time certified library media specialist (librarian) and a full-time library assistant.

500-999

At least one full-time certified library media specialist (librarian) and a half-time library assistant

### (2) OPTION B.

#### ENROLLMENT

#### QUALIFIED SPECIALIST REQUIRED

Fewer than 300

At least one-fifth time certified library media specialist (librarian) and a full-time library assistant.

300 to 499

At least a half-time certified library media specialist (librarian) and a full-time library assistant.

500 +

At least one full-time certified library media specialist (librarian) and a half-time library assistant.

## ADDITIONAL STANDARDS FOR MIDDLE LEVEL SCHOOLS

### 210:35-7-61. Staffing

The school shall provide staffing for the media program through one of the following arrangements:

#### ENROLLMENT

#### QUALIFIED SPECIALISTS REQUIRED

|                |  |
|----------------|--|
| Fewer than 300 | At least a half-time certified library media specialist (librarian)  |
| 300 to 499     | At least one full-time certified library media specialist (librarian) or a halftime library media specialist (librarian) and a full-time library assistant |
| 500 to 999     | At least one full-time certified library media specialist (librarian) and a halftime assistant   |
| 1000 to 1499   | At least one full-time certified library media specialist (librarian) and one full-time library assistant  |
| 1500 plus      | At least two full-time certified library media specialists (librarians) (92)   |

210:35-9-71. Staffing.

The school shall provide staffing for the library media program through one of the following arrangements:

ENROLLMENT

QUALIFIED SPECIALISTS REQUIRED

Fewer than 300.

At least a half-time certified library media specialist (librarian).

300 to 499

At least one full-time certified library media specialist (librarian) or a half-time library media specialist (librarian) and a full-time library assistant.

500-999

At least one full-time certified library media specialist (librarian) and a half-time library assistant.

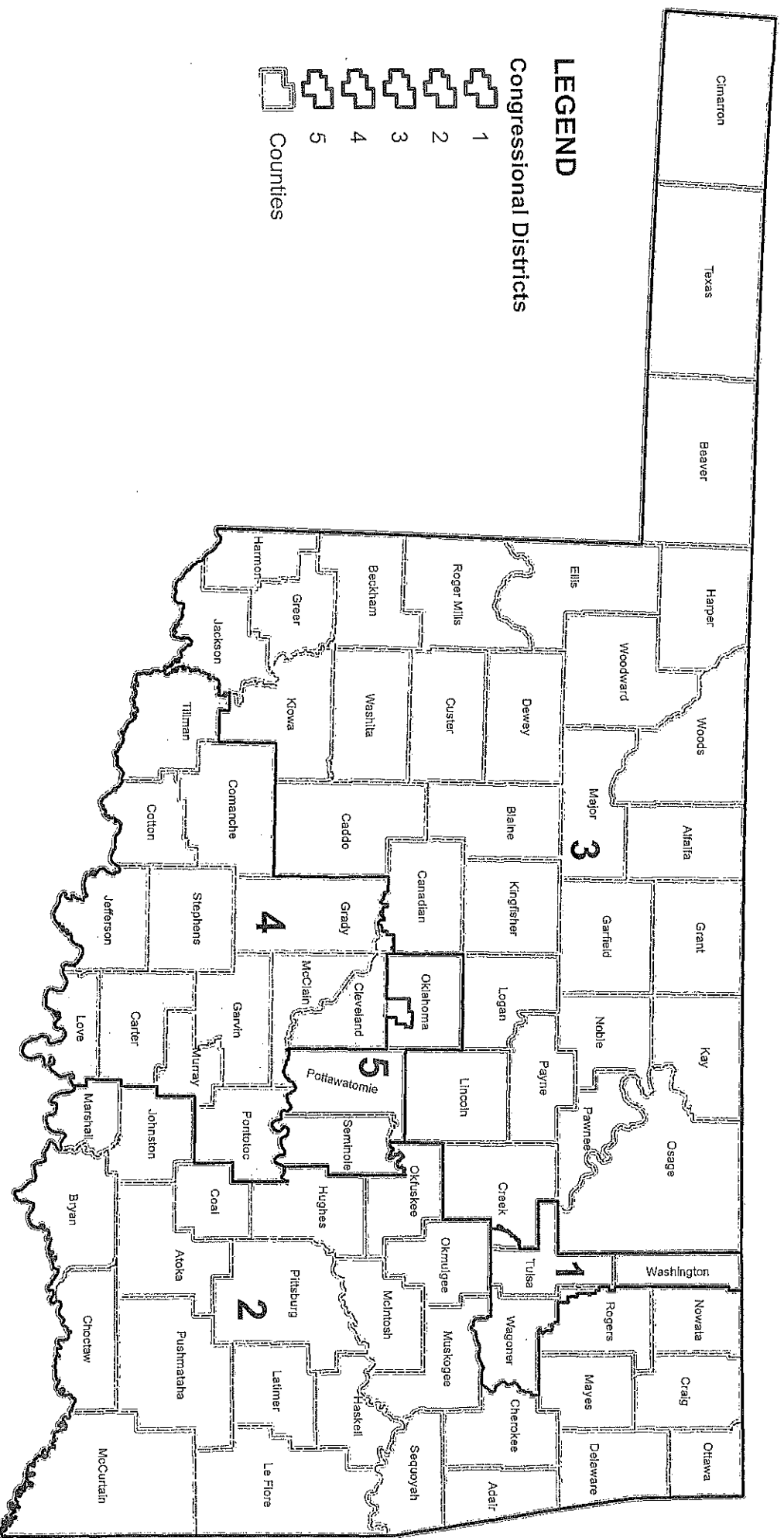
1000 to 1499.

At least one full-time certified library media specialist (librarian) and one full-time library assistant.

1500 plus

At least two full-time certified library media specialists (librarian)

# Oklahoma Congressional Districts Elections



**LEGEND**

**Congressional Districts**

1  
2  
3  
4  
5

**Counties**

**SCHOOL SITE STATUTORY WAIVER/DEREGULATION APPLICATION**  
**for 20 24 - 20 25 school year**

Seminole  
COUNTY

Seminole  
SCHOOL DISTRICT

600 West Strother  
SCHOOL DISTRICT MAILING ADDRESS

Seminole  
CITY

74854  
ZIP CODE

Betty L. Smith Early Childhood Center

NAME OF SITE

Angela Parks  
PRINCIPAL SIGNATURE\*

10-8-24  
DATE

PRINCIPAL SIGNATURE\*

DATE

PRINCIPAL SIGNATURE\*

DATE

Bob Gragg

SUPERINTENDENT NAME (PLEASE PRINT)

bgragg@sps.k12.ok.us

SUPERINTENDENT E-MAIL ADDRESS

Bob Gragg  
SUPERINTENDENT SIGNATURE\*

10-8-2024  
DATE

I hereby certify that this waiver/deregulation application was approved by our local board of education at the meeting on 10/08, 20 24

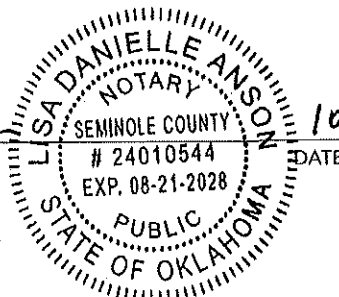
Lisa Cobb  
BOARD PRESIDENT SIGNATURE\*

10-8-2024

NOTARY SEAL →

Lisa Danielle Anson  
NOTARY

8-21-2024  
COMMISSION EXPIRATION DATE



10-8-24  
DATE

Statute/Oklahoma Administrative Code to be Waived: OAC210:35-7-61  
(specify statute or OAC (deregulation) number: (see instructions))

\*Original signatures are required. The attached questionnaire must be answered to process.\*\*

**THE WAIVER/DEREGUALTION IS REQUESTED FOR:**

       One Year Only

☒ Three Years\*

\*Please see instruction page for additional requirements for a three year request

**SDE USE ONLY**

PROJECT YEARS  
       of       

**ENROLLMENT**

       High School  
       Jr./Middle High  
       Elementary  
       District Total

**RECEIVED NOV 07 2024**

DATE RECEIVED

70 O.S.       

OAC 210:35-5-71  
210:35-7-41  
210:35-9-71

NAME OF WAIVER

library media services

**A. Reason for the waiver/deregulation request (be specific).**

Currently, Betty L. Smith ECC has an enrollment of 187 prekindergarten and kindergarten students, which has necessitated a shift in our library staffing model. Instead of a full-time library media specialist, we are utilizing a half-time paraprofessional to serve in the library. This decision is a direct response to the decline in enrollment and the associated budgetary constraints faced by our district.

**B. List alternate strategies/plans which the district/site proposes, and how this plan will best serve the students of your district, i.e., a description of the educational benefits to the students and learning achievement.**

The full-time library media specialist at Wilson Elementary will be essential in supervising and collaborating with the library assistant to provide comprehensive and effective library media services for our students. This partnership aims to cultivate a cohesive and vibrant library environment that addresses the diverse needs of our student body. The library media specialist will mentor the library assistant, sharing valuable expertise in information literacy, resource management, and technology integration. This collaborative approach ensures that both staff members are aligned in their goals and strategies, fostering a unified vision for library services. Through regular communication and joint planning sessions, they will identify and implement best practices to enhance student engagement and optimize resource utilization.

**C. Educational impact to the district: Results of the Statutory Waiver/Deregulation, i.e., effect on student performance levels, impact of plan on other sites in the district.**

We do not expect any negative impact on student teaching and learning from this request. The presence of a library media specialist at Wilson Elementary will provide students with consistent supervision and expert guidance, ensuring that library services are effective and tailored to meet their needs.

**D. Timeline:** Please submit class schedule, calendars, assessment forms and other attachments as necessary, or described in instructions.  
A waiver/deregulation can be granted for up to 3 years. (Please see instructions for additional requirements)

The decline in enrollment presents a financial challenge for the district. However, as student enrollment increases, we expect that the corresponding rise in funding will enable us to hire a qualified Library Media Specialist.

**E. Any financial impact to the District (positive or negative) for the proposed waiver/deregulation.**

The decline in enrollment has significant implications for our school's budget, particularly when it comes to staffing positions such as a library media specialist. With fewer students, our funding sources, including state allocations and local support, diminish, making it increasingly challenging to maintain our current staffing levels.

**F. Describe method of assessment or evaluation of effectiveness of the plan.**

The full-time library media specialist who is serving at Wilson Elementary will play a crucial role in supervising and guiding the library assistant, ensuring that the services offered are effective and meet the needs of our students. This involves regularly assessing the quality and accessibility of library resources, as well as evaluating how well the library environment supports student learning and engagement. To evaluate effectiveness, the library media specialist will implement various assessment strategies. This could include gathering feedback from students through surveys or informal discussions, observing library usage patterns, and analyzing circulation statistics. These methods will help identify which services are most beneficial and which may need adjustments. Moreover, the specialist will pay close attention to how the changes in library staffing and services impact student experiences. This means monitoring not only academic outcomes, such as improved research skills or increased resource utilization, but also qualitative factors like student satisfaction and engagement with the library.

**\*\* You will be contacted if more information is needed to process this request.**



**SCHOOL SITE STATUTORY WAIVER/DEREGULATION APPLICATION**  
**for 20 24 - 20 25 school year**

Seminole

COUNTY

Seminole

SCHOOL DISTRICT

600 West Strother

SCHOOL DISTRICT MAILING ADDRESS

Seminole

CITY

74854

ZIP CODE

Seminole Middle School

NAME OF SITE

PRINCIPAL SIGNATURE\*

DATE

PRINCIPAL SIGNATURE\*

DATE

Bob Gragg

SUPERINTENDENT NAME (PLEASE PRINT)

bgragg@sps.k12.ok.us

SUPERINTENDENT E-MAIL ADDRESS

SUPERINTENDENT SIGNATURE\*

DATE

I hereby certify that this waiver/deregulation application was approved by our  
local board of education at the meeting on 10/08, 20 24

BOARD PRESIDENT SIGNATURE\*

NOTARY SEAL →

NOTARY

COMMISSION EXPIRATION DATE

Statute/Oklahoma Administrative Code to be Waived: OAC210:35-7-61  
(specify statute or OAC (deregulation) number, see instructions)

\*Original signatures are required. The attached questionnaire must be answered to process.\*\*

**THE WAIVER/DEREGULATION  
IS REQUESTED FOR:**

One Year Only



Three Years\*

\*Please see instruction page for additional  
requirements for a three year request

**SDE USE ONLY**

PROJECT YEARS

of

**ENROLLMENT**

High School

Jr./Middle High

Elementary

0 District Total

DATE RECEIVED

70 O.S.

OAC

NAME OF WAIVER

**A. Reason for the waiver/deregulation request (be specific).**

Currently, Seminole Middle School has an enrollment of 178 students, which has necessitated a shift in our library staffing model. Instead of a full-time library media specialist, we are utilizing a half-time paraprofessional to serve in the library. This decision is a direct response to the decline in enrollment and the associated budgetary constraints faced by our district.

**B. List alternate strategies/plans which the district/site proposes, and how this plan will best serve the students of your district, i.e., a description of the educational benefits to the students and learning achievement.**

The full-time library media specialist at Seminole High School will play a pivotal role in overseeing and collaborating with the library assistant to deliver comprehensive and effective library media services for our students. This partnership is designed to create a cohesive and dynamic library environment that meets the diverse needs of our student body. The library media specialist will provide mentorship and guidance to the library assistant, sharing expertise in areas such as information literacy, resource management, and technology integration. This collaborative approach ensures that both staff members are aligned in their goals and strategies, promoting a unified vision for library services. Regular communication and joint planning sessions will enable them to identify and implement best practices for student engagement and resource utilization.

**C. Educational impact to the district: Results of the Statutory Waiver/Deregulation, i.e., effect on student performance levels, impact of plan on other sites in the district.**

We do not foresee any negative impact on student teaching and learning resulting from this request. Not only will there be supervision and guidance from a library media specialist, our library assistant, who is currently pursuing her degree, brings a unique combination of enthusiasm and expertise to her role. Her passion for literature and literacy is evident in her interactions with students and her commitment to fostering a love of reading. The library assistant's ongoing education enhances her capabilities, as she is continuously acquiring new skills and knowledge that will benefit our students. She is well-equipped to assist in a variety of library functions, such as organizing resources, facilitating access to materials, and supporting literacy initiatives.

**D. Timeline:** Please submit class schedule, calendars, assessment forms and other attachments as necessary, or described in instructions.  
A waiver/deregulation can be granted for up to 3 years. (Please see instructions for additional requirements)

The decline in enrollment poses a current financial challenge to the district. As student enrollment rises, it is anticipated that the accompanying increase in funding will provide the necessary financial resources to support the hiring of a qualified Library Media Specialist.

**E. Any financial impact to the District (positive or negative) for the proposed waiver/deregulation.**

The decline in enrollment has significant implications for our school's budget, particularly when it comes to staffing positions such as a library media specialist. With fewer students, our funding sources, including state allocations and local support, diminish, making it increasingly challenging to maintain our current staffing levels.

**F. Describe method of assessment or evaluation of effectiveness of the plan.**

The full-time library media specialist who is serving at our high school will play a crucial role in supervising and guiding the library assistant, ensuring that the services offered are effective and meet the needs of our students. This involves regularly assessing the quality and accessibility of library resources, as well as evaluating how well the library environment supports student learning and engagement. To evaluate effectiveness, the library media specialist will implement various assessment strategies. This could include gathering feedback from students through surveys or informal discussions, observing library usage patterns, and analyzing circulation statistics. These methods will help identify which services are most beneficial and which may need adjustments. Moreover, the specialist will pay close attention to how the changes in library staffing and services impact student experiences. This means monitoring not only academic outcomes, such as improved research skills or increased resource utilization, but also qualitative factors like student satisfaction and engagement with the library.

**\*\*** You will be contacted if more information is needed to process this request.



## SEMINOLE PUBLIC SCHOOLS

OFFICE OF THE SUPERINTENDENT  
DISTRICT ADMINISTRATION & EDUCATIONAL SERVICES CENTER  
600 W. STROTHER AVENUE  
P.O. Box 1031  
SEMINOLE, OKLAHOMA 74818-1031  
(405) 382-5085 (Ext. 602)  
[bgragg@sps.k12.ok.us](mailto:bgragg@sps.k12.ok.us)

October 23, 2024

Accreditation Standards Division  
2500 North Lincoln Boulevard, Suite 210  
Oklahoma City, Oklahoma 73105-4599

RE: Statutory Waiver/ Deregulation Request  
Library Media Services (Elementary/ Middle School/ High School)  
OAC 210:35-5-71 // OAC 210:35-7-61 // OAC 210:35-2-9-71

Seminole Public School is requesting a three-year statutory waiver/deregulation regarding our district-wide certified library media specialist. A long-time library media specialist at our high school site retired at the end of the 2023-2024 school year and due to a decline in student enrollment over the past few years, we made the decision to reorganize the duties based on the three full-time library media specialists remaining in the district. Our reorganization staffing plan includes a full-time certified librarian and an assistant serving our Early Childhood Center and Lower Elementary sites; a full-time certified librarian at our intermediate site; and a full-time certified librarian and an assistant serving our High School and Middle School.

We developed the plan based on the standards of the accreditation regulations for library media based on student enrollment numbers. We were thinking that we could reorganize without the statutory waiver/deregulation until we received guidance recently from our Regional Accreditation Officer. Our RAO recommended that we formally request this statutory waiver/deregulation.

We appreciate the support from our RAO and the Oklahoma State Department of Education. Please let us know if you have any further questions or recommendations.

Respectfully submitted,

Bob Gragg, PhD.  
Superintendent