



DATE: August 21, 2026
TO: RAILS Board of Directors
FROM: Monica Harris, Executive Director
SUBJECT: 8.1 Recommendation for Suspension

As detailed in the accompanying memo from Member Engagement Specialist Jessica Silva, maintaining membership in the Reaching Across Illinois Library System (RAILS) requires compliance with Illinois statutes and administrative rules governing library systems and grant eligibility.

Following a review initiated by the Illinois State Library (ISL) and subsequent verification of staffing levels at Marengo Community High School District #154, RAILS administration recommends the suspension of Marengo CHS #154's system membership due to non-compliance with statutory staffing requirements.

Background & Findings

March 23, 2026: The Illinois State Library requested that RAILS research Marengo CHS #154's ongoing eligibility for system membership and the annual School District Library Grant.

August 2026: Following outreach and communication with the Superintendent at Marengo CHS #154 regarding current staffing, RAILS sought final clarification from the Illinois State Library.

August 17, 2026: ISL Associate Director of Grants & Programs Karen Egan formally confirmed that, based on position intent and assigned duties, the district does not meet the requirement of employing an individual whose "primary duty is to serve as a librarian."

Governing Legal & Administrative Framework

System membership and grant eligibility are directly tied under Illinois law:

School Library Grant Statutory Requirement (75 ILCS 10/8.4):

*"To qualify for grants under this Section, a school library must: 1) Be an entity which serves the basic information and library needs of the school's employees and students through a bibliographically organized collection of library materials, **has at least one employee whose primary duty is to serve as a librarian**, and has a collection permanently supported financially, accessible centrally, and occupying identifiable quarters in one principal location..."*



System Membership Administrative Rule (23 IL Admin. Code 3030.200):

*"A public school district that is applying for membership in any library system **shall meet the requirements for school library grants specified in Section 8.4 of the Act.**"*

Because Marengo CHS #154 no longer maintains a staff member whose primary duty is serving as librarian, the district fails to satisfy the statutory criteria mandated for multitype system membership.

Recommendation

Based on the findings outlined here and in Jessica Silva's detailed background report, RAILS administration recommends that the Board vote to suspend the membership of Marengo CHS #154.

We will discuss this matter in detail at our meeting on August 28, 2026. Please let me know if you have any preliminary questions or require additional documentation prior to the meeting.



DATE: August 17, 2026
TO: RAILS Board of Directors
FROM: Jessica Silva, Member Engagement Specialist
SUBJECT: 8.1 Recommendation for Suspension

Membership in RAILS requires compliance with Illinois statutes and administrative rules of all library system members in order to retain system membership and eligibility for grants administered by the Illinois State Library [23 Ill. Adm. Code 3030.200].

Recommendations for Suspension

For context, here is a brief timeline of communication that we've had with staff at Marengo CHS #154:

- March 2026 – RAILS was contacted by the Illinois State Library to research whether this school library met system requirements
- April 28 - Jessica Silva reached out to Marengo CHS #154 via e-mail; no response
- June 11 - Jessica Silva reached out to Marengo CHS #154 via e-mail; no response
- June 11 – Jessica Silva called Marengo CHS #154 staff; she was told “there is no library or staff”
- June 26 - We sent a letter to Marengo CHS #154 asking them to verify if they met system requirements
- July 8 - Superintendent David Engelbrecht called Jessica Silva and could not confirm that the library is staffed and meeting membership requirements
- July 29 – We sent a certified letter notifying Superintendent Engelbrecht that we intended to pursue suspension
- August 8 – Superintendent David Engelbrecht responded to the letter via email
- August 17 – Dan Bostrom reached out to Karen Egan at the state library to follow up about the situation
- August 17 – Karen Egan responded to Dan Bostrom that the school does not meet the “primary duty to serve as librarian” statute

We ask that the RAILS Board recommend the suspension of the following libraries to the Illinois State Library:

Agency	Type	Reason
Marengo CHS #154	School	Unstaffed library