

**SCHOOLS AND LIBRARIES UNIVERSAL SERVICE PROGRAM  
TECHNOLOGY PLAN  
POLICIES AND PROCEDURES  
January 5, 1998**

**I. THE TECHNOLOGY PLAN**

Telecommunication networks and Internet access can transform our schools and libraries into information age learning centers. No matter where a school may be, its teachers and students can use information technology to tap into the world's knowledge bank. They can work with scientists and scholars near and far to explore exciting topics in science, current events, history, languages, or the arts, and they can share the findings of their own real-world research with peers around the globe. Libraries in every region of the country can use these same technologies to become true community gateways to the resources all Americans need for responsible citizenship and productive work in the 21st Century.

But, as powerful as they are, modern computers and telecommunication networks alone will not be enough to improve learning. Educators and librarians must begin with a clear vision of how these tools can be linked with strong professional development strategies, new curriculum content, and enhanced services to improve schools and libraries. Careful planning and sound operational strategies will ensure that school and library investments in information technology pay off in significant education and library service advancements.

The Federal Communications Commission (FCC) recognized the necessity of thoughtful preparations for the use of these new technologies when they stipulated that requests for Universal Service Program discounts must be based on an approved technology plan [Section 254(h)(1)(B), of the Telecommunications Act of 1996, and FCC Order 97-157, Paragraph 573]. To ensure that schools and libraries are prepared to use the requested services effectively, and to make certain that students and community members experience the real benefits of the Universal Service Program, applicants must certify that their requests are based on approved technology plans that include provisions for integrating telecommunication services and Internet access into their educational program or library services. Many schools and libraries are already engaged in the development and refinement of such plans.

To qualify as an approved Technology Plan for a Universal Service discount, the plan must meet the following five criteria that are core elements of successful school and library technology initiatives:

- (1) the plan must establish clear goals and a realistic strategy for using telecommunications and information technology to improve education or library services;
- (2) the plan must have a professional development strategy to ensure that staff know how to use these new technologies to improve education or library services;
- (3) the plan must include an assessment of the telecommunication services, hardware, software, and other services that will be needed to improve education or library services;

(4) the plan must provide for a sufficient budget to acquire and maintain the hardware, software, professional development, and other services that will be needed to implement the strategy; and

(5) the plan must include an evaluation process that enables the school or library to monitor progress toward the specified goals and make mid-course corrections in response to new developments and opportunities as they arise.

Successful plans align these five criteria with the overall education or library service improvement objectives of states, districts, and local schools or libraries. It is critical that technology planning not be viewed or treated as a separate exercise dealing primarily with hardware and telecommunications infrastructure. There must be strong connections between the proposed physical infrastructure of the information technology and the plan for professional development, curriculum reform, and library service improvements.

## **II. LENGTH AND SCOPE OF PLAN**

Approved Technology Plans should cover a period of three years. Long-range planning is important for the effective use of information technology in schools and libraries. This may be particularly important in the case of some lease-purchase arrangements or very large capital investments that require extended commitments. However, in view of the rapid development cycle of new technologies and services, schools and libraries should approach long-term commitments with caution. To balance these concerns, a three-year planning cycle is appropriate. All approved plans should include provisions for evaluating progress toward the plan's goals, and ideally these assessments should occur on an annual basis. As indicated in Section III of this document, there may be cases in which an approved plan is longer than three years to conform to federal, state, or local requirements. Whenever an approved plan is longer than three years, there should be a significant review of progress during the third year.

Indeed, in light of the dynamic nature of this field, technology plans should undergo periodic revision to take advantage of new hardware, software, and telecommunication opportunities. As school or library staff become more proficient in the use of these information technologies, new education and library service improvement possibilities are also likely to emerge. A technology plan should be responsive to these opportunities; open to revision, and not a static document.

For many schools and libraries, the Universal Service Program itself may be one of those new opportunities. However, there is no need to write or develop a specific Universal Service Program or "E-Rate" technology plan. As discussed in Section IV of this document, it is only necessary that the approved plan include a sufficient level of information to justify and validate the purpose of a Universal Service Program request. It does not have to include the specific details and information called for on FCC Forms 470, 471, and 486. The information provided on those forms should build on the foundation provided by the approved Technology Plan, by documenting specific implementation details and operational steps that are being taken under the plan. That information will be considered a refinement of the plan, as long as the requested services can be supported by the plan.

### **III. TECHNOLOGY PLAN APPROVAL PROCESS**

To ensure that technology plans are based on the reasonable needs and resources of the applicant, and that they are compatible with the goals of the Universal Service Program, the FCC requires independent approval of an applicant's technology plan (FCC Order 97-157, Paragraph 574).

To accommodate the diversity of institutions in the schools and libraries communities, there will be a variety of approvers for technology plans. In each case the approving entity is expected to use the criteria and standards outlined in Sections I and II of this document (which are summarized in "Attachment A"). The Schools and Libraries Corporation (SLC) will provide a letter of certification to each approving entity. Each approving entity, in turn, should provide a copy of a document, similar to "Attachment A," to a school district, school, library system, or library to certify that their plan has been approved in a manner consistent with the criteria listed in the checklist. At the time that an FCC Form 486 is submitted to the SLC, a school or library will be required to identify the entity that has approved its technology plan. In the event of an audit, a school or library may be required to produce a document similar to "Attachment A," in order to document approval of its technology plan.

#### **A. Approval of State Education Agency and Public School Plans.**

The sole approver for State Education Agency (SEA) technology plans is the U.S. Department of Education. An SEA with an approved plan under the "Technology Literacy Challenge," or the "Goals 2000" Program, has an approved plan for purposes of the Universal Service Program. Although these plans cover a period of more than three years, they include provisions for periodic progress evaluations, and the Schools and Libraries Corporation will ask the U.S. Department of Education, for progress reports under these plans during their third year.

Under FCC Order 97-157, Paragraph 574, SEAs are the preferred approvers for K-12 public school plans. A school, school district, or education service agency that has developed a plan approved under a Technology Literacy Challenge Fund initiative, or under a Goals 2000 initiative has an approved plan for purposes of the Universal Service Program. School districts that have received U.S. Department of Education Technology Innovation Challenge Grants have approved plans. Many states also have established their own state-wide technology planning initiatives, and schools, school districts, or education service agencies may develop technology plans for state approval by participating in such initiatives, if those initiatives include the criteria and standards outlined in Sections I and II of this document. School districts that have not developed approved technology plans under one of these national or state initiatives may have their own district-level plans approved by their SEA, following the criteria and standards outlined in sections I and II above.

It is important to note that any school within a district that has an approved technology plan is considered to have an approved plan in its own right, if that district-wide plan supports and validates the use of the contracted telecommunications services for educational purposes in that school in a manner consistent with the criteria and standards outlined in Sections I and II.

If an individual public school develops its own site-based, or building level technology plan, it should seek approval for that plan at the district level, following the criteria and standards in Sections I and II. Charter schools may use those criteria and standards to have their technology plans approved through the same procedure that led to approval of their charter.

An SEA may delegate its approval responsibility by designating a third party to establish and operate an independent peer review process on its behalf. In the event of such delegation, the agency should notify the Schools and Libraries Corporation (SLC), so that the SLC will know what approvals are authorized in that state. The SLC will certify this alternative approval entity, but the state will retain responsibility for the approvers operating under its jurisdiction.

In Order 97-253, the FCC states that: “The Schools and Libraries Corporation may review and certify schools’ and libraries’ technology plans when a state agency has indicated it will be unable to review such plans within a reasonable time.” If such an event occurs, the SEA will notify the SLC, which will consult with the SEA to certify a third party that can establish and operate an independent approval process on behalf of the public schools in the state. Although the SLC will certify this alternative approval entity, the state will retain oversight responsibility for this entity, which will be operating under its jurisdiction.

It is important to note, however, that schools that are subject to a state review process by state or local law may not circumvent the state process by submitting plans directly to the SLC (FCC Order 97-420, Paragraph 157). In the event that the SLC certifies alternative procedures for approval of public school plans in a state, these procedures may not be used as an alternative approval process for public schools in any other state, and no SLC certified approval procedure may be used as an appeals mechanism for any school in any state.

## **B. Approval of Nonpublic School Plans.**

In the states where nonpublic schools are not required by applicable law to obtain state approval for technology plans and telecommunications expenditures, or where state education agencies have indicated that they will not be able to establish a technology plan approval procedure for nonpublic schools, the SLC will authorize an alternative approval process administered by appropriate entities. These approved entities will certify to the SLC that: (1) their approval procedures will be similar in rigor to existing peer reviews used by nonpublic schools for other certification purposes; and (2) that their approval procedures will be based on an independent peer review that will include the criteria and standards for plans outlined in Sections I and II above.

The SLC will certify approval entities for nonpublic school plans. These entities may include: (1) regional accreditation associations; (2) national, state, regional, and local private school associations; and (3) national, state, and regional parochial school associations. In some states, the State Education Agency, or an education service agency, may also work with nonpublic schools to establish an appropriate third party approval process for nonpublic school technology plans. In the absence of any of these alternatives, the SLC may consult directly with a State Education Agency and the nonpublic schools in a state or region to certify appropriate approval procedures. The SLC will maintain a directory of entities that it

has certified to approve nonpublic school plans, and it will facilitate nonpublic school access to these entities when necessary. It is important to note, however, that the SLC, and SLC certified entities, may not be used to appeal the review of any other entity.

A school within a Diocesan school district, or a comparable entity, with an approved plan is considered to have an approved plan in its own right, if that approved district-wide technology plan supports and validates the use of the contracted telecommunications services for educational purposes in that school in a manner consistent with the criteria and standards outlined in Sections I and II. If an individual school within a district develops its own site-based, or building level technology plan, it should seek approval for that plan at the district level following the criteria and standards outlined in Sections I and II.

### **C. Approval of BIA Plans, BIA School Plans, and Plans of Districts and Territories.**

The Bureau of Indian Affairs (BIA), the District of Columbia and the Territories will have their plans approved under the U.S. Department of Education's Technology Literacy Challenge and the Goals 2000 program. The BIA is the preferred approver for BIA school plans, and it will use the criteria and standards outlined in Sections I and II above to approve individual BIA school plans. Any BIA school with an approved Technology Plan under the Technology Literacy Challenge, or the Goals 2000 program, has an approved Technology Plan.

An individual BIA school, or a school system, with a BIA approved plan has an approved plan in its own right. Such a school may choose to participate in the Universal Service program independently of the BIA in its own right, if that the BIA approved plan supports and validates the use of the contracted telecommunications services for educational purposes in that school in a manner consistent with the criteria and standards in Sections I and II. If an individual BIA school, or any other school or system serving Indian students, develops a technology plan that is not covered by BIA approval, the SLC will consult with appropriate entities to establish an alternative approval procedure.

### **D. Approval of State Library Agency and Library Plans.**

State Library Agencies may have their plans approved through several mechanisms. The Institute of Museum and Library Services (IMLS) has approved a Library Services and Technology Act (LSTA) Plan for every state. These plans are similar in purpose and scope to Technology Literacy Challenge plans for SEAs, and they constitute approved technology plans for the purposes of the Universal Service Program. Alternatively, a State Library Agency may choose to use a technology plan approved by an appropriate body within the state (e.g. the legislature, state department of telecommunications, state department of information technology, etc.). Since LSTA Plans, and many alternative state agency plans, cover a period of more than three years, the SLC will ask the IMLS, or the state agencies, for a progress report under these plans during their third year.

State Library Agencies, in turn, are the preferred approvers for the technology plans of library systems and libraries in their states. The SLC will consult with State Library Agencies about their approval procedures, and will certify their approval process if they include the criteria and standards outlined in Sections I and II of this document.

An individual library within a system that has an approved plan is considered to have an approved plan in its own right, if that approved system-wide technology plan supports and validates the use of the contracted telecommunications services in that library in a manner consistent with the five criteria outlined in Sections I and II. If an individual library chooses to develop its own technology plan, it should seek approval for that plan at the local system level, following the criteria and standards in Sections I and II.

A State Library Agency may delegate its approval responsibility by designating a third party to establish and operate an independent peer review process on its behalf. In the event of such delegation, the agency should notify the Schools and Libraries Corporation (SLC), so that the SLC can certify the alternative entity and know what approvals are authorized in that state, but the state agency should retain responsibility for the approvers operating under its jurisdiction.

#### **IV. AUDITS**

The Schools and Libraries Corporation is establishing a system of audits for Universal Service discount applications. All applicants should be aware that as they complete forms 470 and 471 they are certifying that their request for services will be based on a Technology Plan that has been, or will be, approved in accordance with the criteria and standards outlined in Sections I and II of this document.

It is important to note that the Technology Plan approval process does not have to be completed to file forms 470 and 471. In the “Status of Technology Plans” boxes on those forms (item 23 on FCC 470, and item 24 on FCC 471) the applicant can indicate that the Technology Plan will be approved by an authorized body by the time that services are received. To receive services, the school or library must file an FCC form 486, and by the time of that filing the Technology plan must be approved. The approving entity is required to provide the applicant with a Certification of Technology Plan Approval that is similar to Attachment A, and Form 486 will require certification that the approval has been obtained. The only schools or libraries that do not have to comply with the Technology Plan requirement are those requesting support for voice services only (i.e., telephone service).

In the event of an audit, applicants to the Schools and Libraries Universal Service Program will be asked to use their technology plan to justify the telecommunications services they are receiving under the Program. The technology plan should provide sufficient information about the school’s education objectives, or the library’s service strategy, to validate the purpose of the services.

For example, although the approved plan may not have been specifically written to apply for a Universal Service discount, the plan should document an educational purpose or a need for library services that is consistent with the “Summary Description of Needs or Services Requested” in Block 3 of FCC Form 470. The approved plan should be consistent with the “Technology Assessment” in Block 4, and it should support the “Certifications” in Block 6 of FCC Form 470. The approved plan also should be consistent with similar information blocks in FCC Form 471, and it should support the “Certifications” in FCC Forms 471 and 486.

Documentation to demonstrate fulfillment of such requirements should be retained for audit purposes.

In conjunction with assuring that the technology plan has been approved in a manner consistent with all of the criteria and standards outlined in Sections I and II of this document, the certifications on FCC Forms 470 and 471 also include a specific assurance that the school or library will secure access to all of the resources, including computers, training, software, maintenance and electrical connections, that will be needed to make effective use of the telecommunications services purchased as well as to pay the discounted charges for eligible services.

### **FOR ADDITIONAL INFORMATION**

To ensure that all schools and libraries, regardless of financial resources or geographic location, have the opportunity to participate in the Universal Service Program, the Schools and Libraries Corporation (SLC) is committed to open and regular communications.

To respond to your questions about the Universal Service Program the SLC has established a Client Service Help Desk, which you may reach by a toll-free telephone call to: **1-888-203-8100**. You may also reach the Help Desk by e-mail ([question@slcfund.org](mailto:question@slcfund.org)), or by fax at: **1-888-276-8736**. The Help Desk will be able to answer many of your questions about establishing an approved Technology Plan, and they will be able to refer you to the certified approval entity in your state or region.

Additional information about the Universal Service Program may also be obtained on the World Wide Web at:

<http://www.slcfund.org>

or

<http://www.neca.org>

To correspond by mail about the Technology Plan approval process, you may address letters to:

Thomas G. Carroll  
Technology Planning and Evaluation  
Schools and Libraries Corporation  
Suite 200  
1023 15th St., N.W.  
Washington, DC 20005

### **PLEASE DO NOT SEND YOUR TECHNOLOGY PLAN TO THE SLC**

**To submit a Technology Plan for approval, contact the Client Service Help Desk at: 1-888-203-8100. You will be referred to the certified approval entity in your state or region. You will also find a list of certified approvers on the Web sites. Technology Plans will be reviewed by local, state, or regional entities, and sending your plan to the Schools and Libraries Corporation will only delay your approval process.**

**ATTACHMENT A**

**CERTIFICATION OF TECHNOLOGY PLAN APPROVAL  
for  
SCHOOLS AND LIBRARIES UNIVERSAL SERVICE PROGRAM**

\_\_\_\_\_ is certified by the Schools and Libraries Corporation to approve technology plans for participation in the Schools and Libraries Universal Service Program.

\_\_\_\_\_ has a technology plan that has met the standards and criteria outlined in the following checklist.

**CHECKLIST**

Successful technology plans align the overall education or library service improvement objectives with the following five criteria. To qualify as an approved Technology Plan for a Universal Service Program discount, the plan must meet these criteria. It is critical that technology planning not be viewed or treated as a separate exercise dealing primarily with hardware and telecommunications infrastructure. There must be strong connections between the proposed physical infrastructure of the information technology and the plan for professional development, curriculum reform, and library service improvements.

- \_\_\_\_\_ The plan establishes clear goals and a realistic strategy for using telecommunications and information technology to improve education or library services.
- \_\_\_\_\_ The plan has a professional development strategy to ensure that staff know how to use the new technologies to improve education or library services.
- \_\_\_\_\_ The plan includes an assessment of the telecommunication services, hardware, software, and other services that will be needed to improve education or library services.
- \_\_\_\_\_ The plan provides for a sufficient budget to acquire and maintain the hardware, software, professional development, and other services that will be needed to implement the strategy for improved education or library services.
- \_\_\_\_\_ The plan includes an evaluation process that enables the school or library to monitor progress toward the specified goals and make mid-course corrections in response to new developments and opportunities as they arise.