OWWL LIBRARY SYSTEM

E-Rate Participation and Compliance Policy

Purpose

The OWWL Library System supports equitable and affordable access to broadband services for all member libraries through participation in the federal E-Rate Program, administered by the Universal Service Administrative Company (USAC) under the oversight of the Federal Communications Commission (FCC). This policy outlines the System's role in the E-Rate program and the responsibilities of member libraries to maintain eligibility and compliance.

Overview of the E-Rate Program

The E-Rate Program provides discounts to schools and libraries to help ensure affordable access to telecommunications and internet services. E-Rate support is divided into two categories:

- **Category One**: Services that provide broadband connectivity to libraries (e.g., fiber and internet service).
- **Category Two**: Internal connections and equipment that distribute broadband within the library (e.g., firewalls, switches, and Wi-Fi access points).

Discounts are 90% for Category One and 85% for Category Two funding.

System Responsibilities

The OWWL Library System coordinates and manages the E-Rate application process for all 42 member libraries. This includes:

- Contracting with certified E-Rate consultants for expert support and compliance.
- Filing for Category One E-Rate discounts on behalf of member libraries.
- Filing for Category Two E-Rate discounts for System and Member Library equipment.
- Negotiating and maintaining service contracts with broadband providers.
- Managing firewalls and content filtering for all libraries to ensure compliance with the Children's Internet Protection Act (CIPA).
- Paying internet service provider (ISP) invoices and invoicing member libraries annually for their net share of costs after E-Rate reimbursements are applied.
- Providing documentation and technical assistance as needed.

Member libraries are billed for the remaining net cost, including a portion of the administrative fees paid to the System's contracted E-Rate consultant.

Member Library Responsibilities

In order to remain eligible for E-Rate discounts through the System:

1. **CIPA Compliance**: Each member library must comply with the Children's Internet Protection Act (CIPA), which requires:
   - Use of a technology protection measure (internet filter) to block access to obscene or harmful content for minors.
   - Adoption and enforcement of an Internet Safety Policy.
2. **Policy Adoption**: Member libraries are required to adopt the System's **Acceptable Use and Internet Safety Policy** or maintain a compliant local equivalent.
3. **Cooperation**: Libraries must cooperate with the System in the collection of required data and documentation, and promptly respond to any requests for information needed to fulfill E-Rate filing obligations.
4. **Policy Compliance:** To remain eligible for all System services, including participation in System-managed E-Rate filings, member libraries must comply with all OWWL Library System policies, including those outlined in the System and Member Libraries Relationship Policy.

Transparency and Reporting

The System will annually share with member libraries:

- A summary of the total telecommunications costs.
- The amount of E-Rate discounts received.
- The net cost billed to each library.
- Any policy or regulatory updates that affect E-Rate participation.

Questions and Support

Libraries with questions about their eligibility, compliance requirements, or billing may contact the OWWL Library System technology or administrative staff for assistance.

Adopted: May 14, 2025