E-rate FAQ

Effect of E-rate on SCLS Headquarters

If services such as the firewall are managed centrally, is there any component that is eligible for E-rate category 2 funding?

Bob Bocher has informed us that we WILL be able to apply for E-rate for SCLS network services at a pro-rated amount based on the number of libraries that are CIPA-compliant. If everything is going through the headquarters building from a router point of view, then headquarters is E-rate eligible. SCLS could apply for category 2 for router upgrades and wiring at headquarters, equipment for firewall, the network, wireless equipment and supporting software for any of these services. We will also be able to receive pro-rated discounts on our WiscNet connection. SCLS will be upgrading and/or replacing network infrastructure (including Wireless) in the next several years. The ability to apply for E-rate discounts has the potential to save libraries in compliance with CIPA a good sum of money.

If all libraries complied with CIPA, we would also be able to use LSTA funds for laptops and tablets which is something that we cannot do now.

The Cost Formula will need to work out how we will assess fees for libraries that are CIPA compliant and non-CIPA compliant moving forward.

Is the cost of filtering included in E-rate category 2?

Filtering is not E-rate eligible. However, cost savings from other areas can offset the filtering costs.

Effect of CIPA on Libraries (Filtering)

Do all libraries on the SCLS network need to filter to qualify for the items in category 2 funding? For example, if libraries a, b and c on the SCLS network choose to filter, can we get the equipment discounts for them, but not for library d who does not filter?

No. We can filter for some libraries, but not all. Libraries that filter (and meet additional CIPA requirements will be able to apply for E-rate discounts). Filtering will not be required on SCLS-supported PCs.

Do all PCs in the library need to be filtered, including staff and those not on the SCLS network?

Yes. The browser filtering option may work for staff PCs.

Do library-supported tablets need to be filtered?

Yes.

Do PCS not owned by the library, but which are on a network in the library need to be filtered?

Yes. All PCs in the library would need to be filtered. It might be possible to set up the browser to be a safe search and this might qualify for them as being "filtered." This qualifies and it has not been questioned. Filtering is a local decision. For PCs on the SCLS network, SCLS will provide the iBoss filtering system.

Does the wireless service need to be filtered?

Yes. All wireless in the library would need to be filtered whether it is supported by SCLS or not.

Does the "harmful to minors" phrase apply to only obscenity, or is it broader?

It is vague and intentionally vague in order to allow the local culture to decide what is "harmful to minors." The law is specific, the FCC rules and regulations are open to local interpretation. Here is a statement from Ryan Claringbole who coordinates E-rate at DPI. "The main takeaway is that the filters protects against access to visual depictions (not online text) that are obscene, child pornography, or harmful to minors. Harmful to minors is defined as: "``(B) HARMFUL TO MINORS.-- The term `harmful to minors' means any picture, image, graphic image file, or other visual depiction that-- ``(i) taken as a whole and with respect to minors, appeals to a prurient interest in nudity, sex, or excretion; ``(ii) depicts, describes, or represents, in a patently offensive way with respect to what is suitable for minors, an actual or simulated sexual act or sexual contact, actual or simulated normal or perverted sexual acts, or a lewd exhibition of the genitals; and (iii) taken as a whole, lacks serious literary, artistic, political, or scientific value as to minors."

Does logging in as an adult comply with E-rate, or must they be blocked and then ask to override content?

From Bob Bocher: I'm 95% certain patron self-authentication will pass as being CIPA compliant. (USAC already supports the patron self-authentication option and along with ALA will push this with the FCC.) Here's an update on the CIPA disabling issue. The final version of a short ALA background paper and a legal analysis by the U. of Colorado Law School will (hopefully!) be done late next week. Then these two documents will go to the SLD/USAC and FCC for their review. What is not known is what type of support or endorsement ALA will get from the FCC on these disabling options. At a minimum, ALA needs the FCC to at least tacitly "OK" these options. (FCC may let USAC take the lead on this, which is fine.) Ideally, I like to think we'll get some feedback from USAC and the FCC in Dec.

Can libraries choose their own filters?

If a library has PCs that are not on the SCLS network, they can choose their own filters. If PCs are on the SCLS network, they will be filtered using iBoss.

Do all libraries need to filter at the same level?

In the beginning, we would filter only visual pornography. We would start with some standard options-such as children's PCs which cannot have sites unblocked and adult PCs where blocked sites

can be overridden. Later on, we may be able to offer different levels of filtering within the limits of our filtering software and what can be efficiently managed.

How does the filtering software allow someone to unblock "overblocked" content? Does it require intervention from the library staff or is it possible to override using authentication?

See the separate [FAQ on iBoss filtering](#).

E-rate Funding

What is eligible for discounts in libraries?

Routers, switches, wireless access points; antennas, cabling, connectors, and related components used for internal broadband connections; racks; uninterruptible power supply/battery backup; and caching; basic maintenance of eligible broadband internal connections components.

Does my library currently receive E-rate funding through the TEACH network and will that be affected?

Any library that receives their internet from BadgerNet, funded by TEACH, already receives E-rate discounts which are managed by the state. CIPA is not a requirement to receive this E-rate funding. This will not have any affect if you become CIPA compliant in order to receive Category 2 discounts. However, SCLS may be able to get additional E-rate discounts if libraries become CIPA compliant.

How would the filtering costs be divided?

It looks like the filtering costs could be absorbed into the current budget with little or no impact on fees. The Cost Formula Work Group would determine this.

Can you tell me what my estimated savings would be if my library filters?

We are doing our best to provide some estimates for individual libraries. This is difficult because fees are assessed by a formula and not based on actual costs. We will be able to tell each library what their equipment costs and what their discount is. We will be able to tell you how many wireless access points you currently have, so you would know what the savings will be when you upgrade them. It will be up to the Cost Formula Work Group to create a new cost formula for Network Services fees that incorporates E-rate. Any figures we give you now may not represent final savings. If SCLS can apply for E-rate funding for headquarters equipment and for replacing the current wireless solution, libraries will be able to save more. However, we may not be able to reduce fees, but we may be able to keep them from increasing. This will also be worked out by the Cost Formula Work Group.

What costs are involved for each library to implement the compliance issues associated with filtering?

There is a cost for the iBoss filtering software, but as mentioned we believe it can be incorporated into the current fees with little or no increase. This would be determined by the Cost Formula Workgroup. We do not anticipate additional costs to implement compliance.

Will there be any other costs associated with applying for E-rate?

There may be some type of fee built into the E-rate application process since SCLS will be handling the E-rate applications on behalf of libraries. The Cost Formula Work Group will assist with determining what this might be.

CIPA Compliance

When does the compliance need to be completed by? One year from the time the application is submitted or from the time of the grant award (July 1)? Do we have one year to install filtering and for the libraries to complete the policy approval process?

We are pretty certain that filtering and the other CIPA compliance tasks must be completed at the start of the grant cycle. The first one we would be applying for would be July 1, 2016 for the 2016/2017 grant cycle. SCLS will assist libraries with the process to become CIPA compliant.

How long is the commitment if we accept E-rate funds?

Here is the answer from Bob Bocher: They must remain CIPA compliant for as long as the library is getting E-rate support for a particular service. This is almost always the length of the application year. E.g., if a library gets E-rate for Internet access as part of the July 1, 2016 application process, they must remain CIPA compliant until June 30, 2017. If they decide not to apply for E-rate for the July 1, 2017 E-rate year, they don't need to be CIPA compliant.

Is there anything else we need to do to become compliant?

Yes, in addition to filtering pornography, libraries must create an Internet Safety Policy that is compliant with CIPA and they must provide reasonable public notice and hold at least one public hearing or meeting to address the proposed Internet safety policy. (Full text below)

1. Internet Safety Policy

Schools and libraries receiving universal service discounts are required to adopt and enforce an Internet safety policy that includes a technology protection measure that protects against access by adults and minors to visual depictions that are obscene, child pornography, or — with respect to use of computers with Internet access by minors — harmful to minors.

- The Internet safety policy must address all of the following issues:
- Access by minors to inappropriate matter on the Internet and World Wide Web
- The safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications
- Unauthorized access including "hacking" and other unlawful activities by minors online
- Unauthorized disclosure, use, and dissemination of personal information regarding minors
- Measures designed to restrict minors' access to materials harmful to minors

For schools, the policy must also include monitoring the online activities of minors. Note: beginning July 1, 2012, when schools certify their compliance with CIPA, they will also be certifying that their Internet safety policies have been updated to provide for educating minors about appropriate

online behavior, including interacting with other individuals on social networking websites and in chat rooms, cyberbullying awareness, and response.

2. Technology Protection Measure

A technology protection measure is a specific technology that blocks or filters Internet access. The school or library must enforce the operation of the technology protection measure during the use of its computers with Internet access, although an administrator, supervisor, or other person authorized by the authority with responsibility for administration of the school or library may disable the technology protection measure during use by an adult to enable access for bona fide research or other lawful purpose.

3. Public Notice and Hearing or Meeting

The authority with responsibility for administration of the school or library must provide reasonable public notice and hold at least one public hearing or meeting to address a proposed technology protection measure and Internet safety policy. For private schools, public notice means notice to their appropriate constituent group. Unless required by local or state rules, an additional public notice and a hearing or meeting is not necessary for amendments to Internet safety policies.