

TEC-F004



SLPS E-Rate Policies and Procedures

Revised 04/2007

To assure long-term consistency and compliance with E-Rate requirements and to assure adequate document retention, SLPS has created this E-Rate Policies and Procedures Manual.

Ownership and maintenance of this document shall be the responsibility of SLPS's Chief Information Officer (CIO) or his/her designate.

To assure enforcement of these policies and procedures on a day-to-day basis, SLPS has created a new full-time staff position of "E-Rate Project Manager" (EPM) (see organizational chart below). SLPS also retains an independent E-Rate Consultant on an annual basis to provide the district with additional E-Rate expertise.

SLPS has formed an E-Rate Management Committee that meets on a periodic basis (at least monthly) to oversee the E-Rate process. Full-time members of the committee are:

Terry Laster – Chief Information Officer
Jesolyn Larry – Exec Director of Instructional Technology
Tom Randolph – Directory of Information Technology
Mark Howell – E-Rate Project Manager
Don Dietrich – E-Rate Consultant (Contractor)

The policies contained in this document will strengthen SLPS's internal controls and will assure E-Rate compliance and auditability over time.

To assure completeness, these policies and documents are based on Funding Request Numbers (FRNs). It will be the responsibility of the EPM to monitor, document and report on the status, compliance and record retention of all FRNs issued under the SLPS Billed Entity Number (136902).

Sections shall be added to this manual over time, as procedures are defined and put into place.

In addition, SLPS has created an *AUDIT FILE* to be the repository of all E-Rate related documents in both paper and electronic form. Details are contained in Section 5 of this manual.

This manual and the Audit File shall be reviewed by the SLPS CIO on a quarterly basis for currency and compliance with SLD guidelines and district requirements.

Terry Laster
CIO
St. Louis City Schools

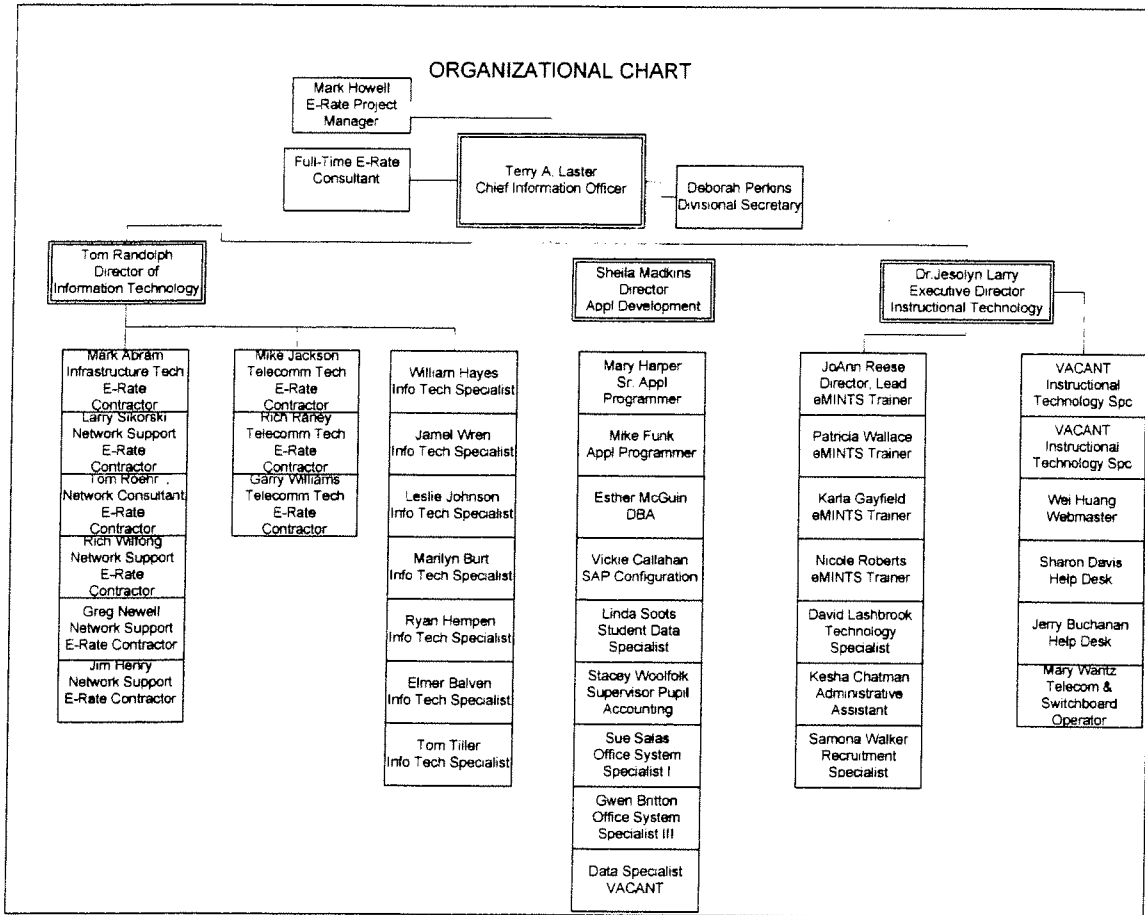
SLPS E-Rate Policies and Procedures Manual – Revised 04/19/07

SLPS PMO Document

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SLPS Information Technology Department



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Section 1: Competitive Bidding Requirements:

E-Rate compliance requires both adherence to SLD guidelines and to State and Local procurement guidelines.

To address the issue of compliance with applicable state and local requirements, SLPS's Purchasing Department has developed a document titled "*Purchasing Department Standard Operating Procedures*" that outlines all applicable requirements and the methods that SLPS uses, and will continue to use to ensure compliance. These policies will be followed in all E-Rate procurement activities. A copy of the document is included as an appendix to this manual.

To address the issue of compliance with SLD guidelines, SLPS Technology department will hold at least one training session per year. These sessions will occur prior to the filing of FCC Form 470 and will be attended by the CIO and his/her designates, including the E-Rate Project Manager. Training will be conducted by SLPS's E-Rate Consultant. Attendance roster and copy of all course content will be retained as part of each year's 'Audit File'. In addition to these sessions, efforts will be made to have at least one member of the Technology Department staff attend the annual 'Train the Trainer' sessions conducted by the SLD.

(see attachment: PURCHASING DEPARTMENT STANDARD OPERATING PROCEDURES)

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Section 2: Detailed Project Management Processes

It will be the responsibility of the EPM to monitor, document and report on the progress and compliance of all E-Rate activity on an FRN basis. Summaries shall be reviewed at least quarterly with the CIO.

2.1 FRN Planning and Tracking

Each year's E-Rate activity shall be summarized in an excel spreadsheet (example shown below) showing all FRN's, Categories of Service, Vendor, Amount Funded and other details, prior to submission of the FCC Form 471. This spreadsheet shall be jointly maintained by the EPM and the E-Rate Consultant (contractor).

Requested (To be entered on Form 471)											
471 Att #	Type	471 Appl #	2007 FRN	Description	Vendor	SPIN	Total Pre-Discounted Amount	% Disc	Total SLD Funding (est.)	Total SLPS Funding (est.)	Notes
1.1	Telecomm	47101 # 560724 / 20882	1552109	Local Telephone Service	SWBell	143004662	\$688,692	89%	\$612,936	\$75,756	Tariffed Rate - Existing Local Telephone Services provided by SWBell to all Schools based on current invoices.
1.2	Telecomm		1575345	SBC WAN	SBC Advanced Solutions	143022137	\$840,240	89%	\$747,814	\$92,426	WAN monthly charges for IMA/ATM and Frame Relay circuits being replaced by Optman.
1.3	Telecomm		1575428	Long Distance	SWB Comm Svcs	143008823	\$6,000	89%	\$5,340	\$660	Long Distance Telephone Services based on contract for 2007
1.4	Internet		1575440	DS3 Internet from SBC Datacomm	SBC Advanced Solutions	143022137	\$59,784	89%	\$53,208	\$6,576	DS3 Line for Internet Note that this FRN and the one below should be replaced by Optman Service
1.5	Internet		1575465	DS3 Internet from SBC Datacomm	SWB Internet Svcs, Inc	143004611	\$18,900	89%	\$16,821	\$2,079	Internet Access at 45mb/sec from SBC
1.6	Telecomm		1575484	Cellular Phone Service	Cingular	143025240	\$431,892	89%	\$384,384	\$47,508	Cellular phones for Technology, Security, Principals and Ass't Prin. Based on 450 phones at \$79.98/mo. (Includes text
1.7	Telecomm		1575514	Smart Trunks	SWBell	143004662	\$44,268	89%	\$39,399	\$4,869	Smart Trunks (PRI) service awarded per RFP. 3 Year Contract expires 06/30/2009.
1.8	Internet		1575533	Hosted Student Email	Gaggle.net	143024051	\$80,850	89%	\$71,957	\$8,894	New Student Email system for 34000 Students

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2.2 Equipment Delivery and Installation Procedures

Following approval of an FRN, the EPM shall be responsible for ordering, delivery, installation and acceptance of all goods and services per the guidelines set forth below.

Saint Louis Public Schools - E-Rate Project Management Equipment Delivery and Installation Procedures

Procedure for delivery and installation of E-Rate Equipment at SLPS schools:

The Service Provider (SP) responsible will coordinate the start and end date for installation of the equipment with the SLPS E-Rate Project Manager (PM).

- Vendor may arrange the on-site visit by contacting the school's principal via phone.
- Vendor will be provided with MDF and all TC's locations by SLPS, as requested

Initial Approval Phase

- After visiting school to verify needs, vendor shall complete and submit Initial Approval form to SLPS Project Manager
- Form shall include list of all equipment to be installed showing serial numbers and locations
- SLPS Project Manager shall reconcile the equipment list with the 471 and Item 21's for the specific FRN(s) to assure that all equipment and services are eligible and consistent with SLD funding guidelines.
- Vendor may ship equipment to school (coordinate with Principal)
- SLPS will obtain and provide asset tags to SP as required.
- Vendor shall begin installation.

Implementation & Completion Phase

- When installation is completed, vendor shall notify SLPS PM.
- SP shall forward final list of equipment installed for final inventory
- SLPS Project Manager shall reconcile the equipment list with the original Initial Approval Form and with the 471 and Item 21's for the specific FRN(s) to assure that all equipment and services are eligible and consistent with SLD funding guidelines.
- SP shall provide projected dates for testing and acceptance.

Testing and Acceptance Phase

- SP shall work with SLPS PM to perform and verify equipment tests.
- SP shall submit Acceptance Form following completion of tests.
- SP shall attach test results and all documentation with form.
- SLPS PM shall review and approve.
- SP shall invoice SLPS for Equipment and Installation Charges on a per/school basis.
- SLPS Project Manager shall review invoice to assure that all equipment and services are eligible and consistent with FRN specifics as described above and shall reconcile any differences with SP prior to submission of invoice for payment.

SP must provide accurate total cost of hardware and services for each school

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2.3 Acceptance Forms

The EPM shall assure the proper signatures and retention of 'Acceptance Forms' that require both Service Provider and School District sign-offs to verify completion dates for all funded projects using the form below:

SLPS E-Rate Delivery and Installation Acceptance Form

Funding Year: _____ FRN: _____			
Vendor: _____			
School Location: _____			
<u>Complete Bill of Materials, including all components, shall be attached to this form.</u>			
Operational Tests performed (Testing Dates):			
LAN Test Results submitted to SLPS: <i>(Show date or attach results to this form)</i>			
WAN Connectivity Tests submitted to SLPS: <i>(Show date or attach results to this form)</i>			
Documentation submitted to SLPS: <i>(Show date or attach documentation to this form)</i>			
Vendor's School Project Manager/Contact:			
Signatures below certify that Delivery and Installation has been completed, test results have been verified and filed, documentation is complete as turned over to SLPS and all work has been Accepted by St. Louis Public Schools.			
	Printed Name / Title	Signature	Date
Vendor Rep Approval (Signature of person Submitting)			
SLPS E-Rate Project Mgr Approval			
School Admin. Approval			

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3.0 Equipment Inventory and Asset Tracking

SLPS Technology department has developed an E-Rate Inventory System that will track each piece of equipment funded under the E-Rate program. This system is based on a SQL database and will be operated through our existing Help Desk operation. The EPM shall forward all Acceptance Forms to the Help Desk for entry into this system. Reports shall be issued and the inventory reviewed for accuracy by the EPM at least quarterly.

(sample input screen)

Each piece of equipment will be tagged with an identifying marker showing the Funding Year, and FRN as well as an Asset Tag Number provided by SLPS Asset Management Group.

(sample inventory listing)

Year	Chassis	Device	IP Address	Verified Serial Number	School	Location Room Number	FRN
Year 10	4036 Chassis 10 09 2 11	FOA04312011		1078			014367
Year 10	4036 Chassis 10 09 2 12	FOA04307009		1078	Printer Room		024908
Year 10	4036 Chassis 10 10 2 11	FOA04307139		107			023353
Year 10	4036 Chassis 10 09 2 10	FOA04133090		113			023378
Year 10	4036 Chassis 10 04 2 14	FOA04487419					
Year 10	4036 Chassis 10 04 2 15	FOA04487377					
Year 10	4036 Chassis 10 04 2 12	FOA04487141					
Year 10	4036 Chassis 10 04 2 13	FOA04178287					
Year 10	4036 Chassis 10 04 2 14	FOA04310125					
Year 10	4036 Chassis 10 11 2 11	FOA04178283			CLUB		05042
Year 10	4036 Chassis 10 11 2 12	FOA04178280			JCL		05036
Year 10	4036 Chassis 10 11 2 13	FOA04487444			CLUB		05041
Year 10	4036 Chassis 10 11 2 14	FOA04487302			FOAL		05051
Year 10	4036 Chassis 10 10 2 11	FOA04046109			Storage Room		05059
Year 10	4036 Chassis 10 10 2 12	SPDA04487719					05064
Year 10	4036 Chassis 10 10 2 14	FOA04178249					05070
Year 10	4036 Chassis 10 10 2 15	FOA04178092					05071
Year 10	4036 Chassis 10 10 2 16	FOA04178278					05078
Year 10	4036 Chassis 10 10 2 17	FOA04310178					05080
Year 10	4036 Chassis 10 10 2 18	FOA04310181					05083
Year 10	4036 Chassis 10 10 2 19	FOA04310186					05085
Year 10	4036 Chassis 10 10 2 20	FOA04303002					05090
Year 10	4036 Chassis 10 10 2 21	FOA04303002					05093
Year 10	4036 Chassis 10 10 2 22	FOA04000041			Customer Office		05108
Year 10	4036 Chassis 10 10 2 23	FOA04487861					05117
Year 10	4036 Chassis 10 10 2 24	FOA04487470					05119
Year 10	4036 Chassis 10 10 2 25	FOA04178094					05128
Year 10	4036 Chassis 10 10 2 26	FOA04178111					05129
Year 10	4036 Chassis 10 10 2 27	FOA04178094					05130
Year 10	4036 Chassis 10 10 2 28	FOA04487078					05133
Year 10	4036 Chassis 10 10 2 29	FOA04487079					05134
Year 10	4036 Chassis 10 10 2 30	FOA04487080					05135
Year 10	4036 Chassis 10 10 2 31	FOA04487081					05136
Year 10	4036 Chassis 10 10 2 32	FOA04487082					05137
Year 10	4036 Chassis 10 10 2 33	FOA04487083					05138
Year 10	4036 Chassis 10 10 2 34	FOA04487084					05139
Year 10	4036 Chassis 10 10 2 35	FOA04487085					05140
Year 10	4036 Chassis 10 10 2 36	FOA04487086					05141
Year 10	4036 Chassis 10 10 2 37	FOA04487087					05142
Year 10	4036 Chassis 10 10 2 38	FOA04487088					05143
Year 10	4036 Chassis 10 10 2 39	FOA04487089					05144
Year 10	4036 Chassis 10 10 2 40	FOA04487090					05145
Year 10	4036 Chassis 10 10 2 41	FOA04487091					05146
Year 10	4036 Chassis 10 10 2 42	FOA04487092					05147
Year 10	4036 Chassis 10 10 2 43	FOA04487093					05148
Year 10	4036 Chassis 10 10 2 44	FOA04487094					05149
Year 10	4036 Chassis 10 10 2 45	FOA04487095					05150
Year 10	4036 Chassis 10 10 2 46	FOA04487096					05151
Year 10	4036 Chassis 10 10 2 47	FOA04487097					05152
Year 10	4036 Chassis 10 10 2 48	FOA04487098					05153
Year 10	4036 Chassis 10 10 2 49	FOA04487099					05154
Year 10	4036 Chassis 10 10 2 50	FOA04487100					05155
Year 10	4036 Chassis 10 10 2 51	FOA04487101					05156
Year 10	4036 Chassis 10 10 2 52	FOA04487102					05157
Year 10	4036 Chassis 10 10 2 53	FOA04487103					05158
Year 10	4036 Chassis 10 10 2 54	FOA04487104					05159
Year 10	4036 Chassis 10 10 2 55	FOA04487105					05160
Year 10	4036 Chassis 10 10 2 56	FOA04487106					05161
Year 10	4036 Chassis 10 10 2 57	FOA04487107					05162
Year 10	4036 Chassis 10 10 2 58	FOA04487108					05163
Year 10	4036 Chassis 10 10 2 59	FOA04487109					05164
Year 10	4036 Chassis 10 10 2 60	FOA04487110					05165
Year 10	4036 Chassis 10 10 2 61	FOA04487111					05166
Year 10	4036 Chassis 10 10 2 62	FOA04487112					05167
Year 10	4036 Chassis 10 10 2 63	FOA04487113					05168
Year 10	4036 Chassis 10 10 2 64	FOA04487114					05169
Year 10	4036 Chassis 10 10 2 65	FOA04487115					05170
Year 10	4036 Chassis 10 10 2 66	FOA04487116					05171
Year 10	4036 Chassis 10 10 2 67	FOA04487117					05172
Year 10	4036 Chassis 10 10 2 68	FOA04487118					05173
Year 10	4036 Chassis 10 10 2 69	FOA04487119					05174
Year 10	4036 Chassis 10 10 2 70	FOA04487120					05175

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4.0 Invoices and BEAR Forms

SLPS has setup the following procedure in partnership with Accounts Payable to assure accurate tracking of all Service Provider Payments and coordination of FCC Form 471 (BEAR) forms.

- SLPS Accounts Payable shall notify Information Technology when any payment is made to any E-Rate Service Provider and shall forward a copy of the check as issued. *(Service Provider payments are tracked based on SLPS Account Numbers specifically designated as E-Rate).*
- Prior to the filing of any BEAR form, Technology Department shall draft a BEAR Worksheet, showing the detailed backup charges and including copies of checks issued to Service Provider.
- BEAR Worksheet shall reconcile all invoices and payments to SLD Requested Amount
- ALL BEAR Worksheets shall be reviewed and approved by the EPM prior to submission to the CIO.
- CIO shall approve all BEAR Forms prior to submission.
- Copies of all BEAR forms, worksheets and other documentation shall be retained in the Audit File for five years after receipt of payment.

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5.0 SLPS / E-Rate Audit File

SLPS has created a centralized repository for all E-Rate Related documents. Contents of this file shall contain at a minimum the documents described below. Additional documents shall be added to the file as required. Whenever possible, documents shall be retained in both paper and electronic format.

In accordance with SLD requirements, all documents shall be retained for at least five years beyond the end of the corresponding Funding Year.

Audit File Contents (by Funding Year)

- Approved SLPS Technology Plan
- Signed and dated Consultant Agreement(s) or Letter of Agency
- E-Rate Planning Spreadsheets
- Form 470's and backup documentation
- RFP documents per Purchasing Department and SLD Guidelines
 - Copies of all Newspaper Ads
 - Copies of all RFPs
 - Copies of all Vendor Responses
 - Evaluation Spreadsheets and selection criteria
 - SLPS Board Approval of selected vendors
 - Copies of all Contracts
- Current and forecast operating budgets
- Form 471's and backup documentation
- Item 21's and backup documentation
- ALL PIA correspondence
- ALL Service Provider correspondence
- Form 486's and backup documentation
- All payments to Service Providers (see above procedures in Section 4)
- Form 472's and backup documentation
- Form 500's and backup documentation
- Copies of all SPIN Change Requests, Service Substitution Requests and any other correspondence with SLD, USAC or related FCC organization.
- SLPS E-Rate Committee Meeting Minutes