



---

PO Box 201800 1515 East 6<sup>th</sup> Avenue Helena, MT 59620 (406) 444-3115

# Montana State Library BTOP Compliance

## Contents

Project Scope Compliance .....	2
BTOP Purchased Item Use.....	2
Reporting.....	2
Desk Reviews.....	3
Site Visits .....	4

## Appendices

Corrective Action Plan Template .....	5
Corrective Action Plan Status Report Template .....	6

## ***Project Scope Compliance***

Because funding was secured for very specific purposes, all strategic decisions and purchases must be directly aligned with the project's purposes. The goal of our BTOP grant is to:

- 1) Provide improved access to broadband service to consumers residing in underserved areas of the country;
- 2) provide broadband education, awareness, training, access, equipment, and support to libraries; and,
- 3) stimulate the demand for broadband, economic growth, and job creation.

Further details regarding each library's allowable scope can be found in your Memorandum of Understanding or Contract.

## ***BTOP Purchased Item Use***

All BTOP items received at your library **MUST** be used for a purpose that fits within the scope of the project for the term of the grant. This means that **EVERY** laptop, desktop, touchscreen, etc. must be located in a public area, specifically to be used by your public guests to access the internet. This also means that items **CANNOT** be located in a staff-only area, and **CANNOT** be used exclusively for purposes such as internal catalog searches and/or self-checkout. There are no exceptions to this! According to the library MOU or contract, BTOP purchased computers must fulfill the requirements of replacing workstations vs. expanding workstations. Any deviation from the MOU or contract must be approved by the Project Director.

## ***Reporting***

Your PCC, Outreach, and Training Reports are due by the **5th** of each month (or the **14th** for subgrantee libraries). In order to meet federal reporting deadlines, all libraries are expected to submit their reports on time. Only pre-approved waivers by the MSL BTOP Project Director will exempt libraries from this obligation. If a report is not received within 3 days of the due date, MSL will remind you via email or phone. Failure to submit accurate reports within one week of the reminder will be cause to remove the library from good standing status. If reports are late for two consecutive months, MSL will contact you to develop a corrective action plan\*, see the [CAP template](#), attachment A. A [CAP status report](#) must be completed by the library as specified in the CAP, attachment B. The library will be considered in good standing and removed from non-compliance following a CAP status report noting completion of necessary tasks. If good standing is not reached within the timeline specified and agreed to in the corrective action plan, MSL will temporarily remove BTOP grant-purchased equipment and

services from your PCC. Multiple infractions may result in suspension or termination, in whole or in part, of participation in the BTOP project.

\*A Corrective Action Plan (CAP) is a way to create and document a plan to improve performance and bring libraries that are not in good standing back into compliance within the guidelines of their MOU or contract.

Report Type	Due Dates	Submission Method	Data Submitted
PCC, Outreach, and Training	<b>Participants:</b> 5 <sup>th</sup> day of each month <b>Subgrantees:</b> 14 <sup>th</sup> day of each month	Form: (Month-specific) PCC_OT_v6, available <a href="#">online</a> and by request Method: Email or fax to <a href="#">Compliance Officer</a> , 406-444-0266	Operating hours, PCC users (wired & wireless), new workstations installed, wait times, outreach activities, training activities
FTE Report	<b>Subgrantees:</b> 14 <sup>th</sup> day of each month	Form: FTE_Report_Form, available <a href="#">online</a> and by request Method: Email or fax to <a href="#">Compliance Officer</a> , 406-444-0266	For BTOP funded FTEs: Date worked, summary of activities
Renovation Status Report	<b>Subgrantees:</b> 14 <sup>th</sup> day of each month	Form: Renovation_Status_Report_Form, available <a href="#">online</a> and by request Method: Email or fax to <a href="#">Compliance Officer</a> , 406-444-0266 or fax	Percent of renovation complete, summary of current months' activities

### ***Desk Reviews***

All BTOP libraries can expect a minimum of one desk review during the term of the project. At least 10 days prior to any scheduled desk review; you will be contacted and given a checklist of items that may be discussed during the review. A desk review may include questions such as: How are you calculating average wait time? Does the inventory list submitted match what is onsite at your library? Who is responsible for compiling data for the reports? No later than 30 days following the review, you will receive a written report with recommendations and findings. If findings are listed in the written report, the library will be required to submit a corrective action plan using the template provided within 30 days of receipt of the report. MSL will then review, comment, and approve the corrective action plan within 30 days of receipt of the plan. The library will be considered in good standing and removed from non-compliance following a CAP status report noting completion of necessary tasks. If good standing is not reached within the timeframe specified in the corrective action plan, MSL will temporarily remove BTOP grant-purchased equipment and services from your PCC. Multiple infractions

may result in suspension or termination, in whole or in part, of participation in the BTOP project.

### ***Site Visits***

All subgrantees can expect a site visit during the term of the project, as well as any libraries with significant findings during a desk review. Libraries will be given a minimum of 10 days' notice prior to any scheduled site visit. Libraries will be given a checklist of items that may be discussed, such as inventory accuracy, report submission and accuracy, and BTOP item use (within the scope of the project). Libraries will also be notified of the reason for the site visit and a list of required participants. Immediately following the visit, the recipient will be given informal feedback regarding recommendations and findings. No later than 30 days following the review, the library director will receive an official written report with recommendations and findings. If findings are listed in the written report, the library will be required to submit a corrective action plan using the template provided within 30 days of receipt of the report. MSL will then review, comment, and approve the corrective action plan within 30 days of receipt of the plan. The library will be considered in good standing and removed from non-compliance following a CAP status report noting completion of necessary tasks. If good standing is not reached within the timeframe specified in the corrective action plan, MSL will temporarily remove BTOP grant-purchased equipment and services from your PCC. Multiple infractions may result in suspension or termination, in whole or in part, of participation in the BTOP project.

# Attachment A

## Corrective Action Plan Template

Library Name:

Date of  
Submission:

Deadline for Status Report:

Purpose:

This plan describes findings reported on XX/XX/XXXX, documents the responsibility for addressing each finding, and describes progress toward addressing findings.

Summary of Findings:

Goals in Addressing  
Findings:

Barriers/Risks to  
Achieving Goals:

Finding(s):

Action Plan(s) to Address Finding(s):

1)

2)

3)

Signatures:

Library Director

Donci Bardash, Project Director

Date

Date

# Attachment B

## Corrective Action Plan Status Report Template

Library Name:

Date of Submission:

Summary of Findings:

Corrective Action Plan Status:

Milestones to Achieve Goal	Responsible Person/due date	Documentation to be submitted to MSL	Current Status/Date
1.			
2.			
3.			

Evidence of Correction (please attach supporting documentation of correction):

Signatures:

\_\_\_\_\_  
Donci Bardash, Project Director

\_\_\_\_\_  
Library Director

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date