REQUIRED SUBSTANTIVE COMPONENTS OF THE LOCAL SCHOOL DISTRICT TECHNOLOGY PLAN

Schools, school districts, and libraries that want to apply for Schools and Libraries support, commonly referred to as "E-rate," must first prepare a technology plan. Beginning with FY2011, technology plans are required only for Priority 2 services (Internal Connections and Basic Maintenance of Internal Connections). An approved technology plan sets out how information technology and telecommunications infrastructure will be used to achieve educational goals, specific curriculum reforms, or library service improvements.

A technology plan designed to improve education should cover the entire funding year (July 1 to June 30) but not more than three years. The plan must contain the following elements:

Goals and realistic strategy for using telecommunications and information technology

A professional development strategy

An assessment of telecommunication services, hardware, software, and other services needed

Ongoing evaluation process

Policies

The technology plan must be approved by a USAC-certified technology plan approver before discounted services can begin. The state is the certified technology plan approver for libraries and public schools. www.usac.org, August, 2011.

| LEA/Charter Name: | Edenton Chowan Schools |
|--------------------------|------------------------|
| LEA/Charter Number: | 210 |
| Superintendent Name: | Dr Allan Smith |
| Superintendent Signature | |
| Local Board Chair Name: | Mr Ricky Browder |

| Local Board Chair Signature: | |
|------------------------------|---------------------------|
| Person of Contact: | Nelle Hyatt |
| Telephone: | 252 482 2811 x 42 |
| Contact Email: | nellehvatt@ecps.k12.nc.us |

Edenton-Chowan Schools Technology Plan

2012-2014

March 5, 2012

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Edenton Chowan Schools Technology Planning Committee/MTAC

Member Job Title/Position

Jenny Wells Media Coordinator at Chowan Middle School

Beth Brabble Media Coordinator at White Oak Elementary

Nancy Heiniger Media Coordinator at D F Walker Elementary

Martha Nixon Technology Facilitator at D F Walker Elementary

Amy Asbell Media Coordinator at J A Holmes High

Vann Lassiter Technology Facilitator for Edenton Chowan

Nelle Hyatt CTO Edenton Chowan Schools

Edenton-Chowan Schools Technology Plan 2012-2014

Vision Statement

Vision Statement

Students and staff will have ubiquitous access to the current tools of technology and the skills for effective and instructional use in the process of education. The school administration will leverage technology to enable the most efficient and effective means of managing the business of schooling. The efficient and seamless use of technology in our school district will be the "way we do business."

Edenton-Chowan Schools Technology Plan Strategic Priorities 2012 - 2014

The North Carolina State School Instructional Technology plans states, "Equal access to technology and 21st century opportunities are critical to ensuring the success of all North Carolina students." Edenton-Chowan Schools has worked to provide the access for our students and staff as stated by the NC Report Card which indicates that Edenton-Chowan Schools has a ratio of 1.51for the number of students to instructional computers as compared to the state average of 2.14.

As with the state, Edenton-Chowan Schools also experiences shortfalls in certain areas concerning the integration and implementation of instructional technology. While in most schools equipment is provided, however, there is a lack of staff development and current technology in the hands of students that is used on a regular basis. From the technology survey offered each year in the district for the last 7 years, it is noted that the time the students actually spent with their hands on a computing device per week is three hours or less for 70 percent of the students.

According to our technology survey, almost 40 percent of our teachers are at the adaption stage. Adaptation stage states that teachers can integrate technology into traditional classroom practices as an extension. Teachers can focus on increased student productivity and engagement. (Adding multimedia resources and use of Internet, desktop publishing, create lessons that integrate technology). We have less than 12 percent who have reached the invention stage. Invention- Technology transforms teaching and learning and the classroom becomes non-traditional, student-centered, constructivist, project-based. Access is crucial for this stage to happen as well as professional development.

Therefore, it is extremely important that Edenton-Chowan Schools continue to strive to provide our students and staff with the resources needed, the leadership to promote the seamless and universal use of current technology, the professional development needed to enhance the instruction and insure that technology transforms the classroom and learning, and the 21^{st} century skills needed to assure that our students have the skills needed in the global workplace.

Strategic Priority 1: A Statewide Shared Services Model

Current Status and Moving Forward

Edenton-Chowan Schools has received tremendous support from the district and the school board. For the last 10 years, a local technology budget provided for the infrastructure, the upgrade of up to almost 15 percent of computers per year, and staff development. Major purchases for technology, i.e., computers, printers, software licenses that affect more than one school, network equipment, and Internet access, are purchased through the technology budget. Other purchases must be approved by the Edenton-Chowan Schools Technology Department to insure compatibility. This practice has afforded us collaborative purchasing through the district.

Edenton-Chowan has also worked closely with Perquimans County Schools on several grants, including the College Tech Prep grant, IMPACT grant, and the Golden Leaf STEM grant. Purchases have routinely been made between the two districts in order to obtain the best price. We have also worked closely with the region to discuss and research costs and shared resources through the RESA. As the state is moving to collaborative pricing for various items, Edenton-Chowan Schools will continue to review options for the best purchasing venues.

The Statewide Shared Services Model promises several options for Edenton-Chowan Schools. While Edenton-Chowan Schools has always has very stable network and cutting edge network due to the network administrator, services from the state will be considered according to cost and reliability. What is needed is a collection of Northeastern North Carolina users to pressure CenturyLink for more reliable service. While we receive Internet service through NCREN, the data actually travels through old Sprint/Carolina Telephone and Telegraph wiring, therefore, reliability is undependable. What will determine the best scenario for Edenton-Chowan Schools is for the state to continue to support us in a more reliable Internet and Wide Area network access at reasonable or minimal cost.

Services that will help with cost for Edenton-Chowan Schools include the AS400 services being moved to the NC Cloud. Other services will also be considered as contracts are to be renewed.

Strategic Priority 1: A Statewide Shared Services Model

Edenton-Chowan Schools will utilize and align with the following key initiatives/plans to reach for the vision and complete the strategic priorities of our plan...

ACRE

Update the analysis of the technology infrastructure needed to support a 21st century curriculum and assessment system and to move additional testing to appropriate technology formats.

By participating in the shared services model offerings, our Edenton-Chowan Schools will better prepare for the transition to online assessments, digital textbooks and universal access to personal teaching devices.

Career and College Ready, Set, Go!

Edenton-Chowan Schools continues to investigate ways to partner with community colleges, businesses, and distance learning opportunities to encourage our students to continue their education in higher education and apprenticeships. Edenton-Chowan Schools will continually assess and upgrade the needed computing devices and infrastructure for this endeavor

Race to the Top Local and State Scopes of Work

Create a district transition plan in alignment with the state IIS technical/business requirements, comprehensive implementation plan, and data use guides. This plan should include plans to update technology infrastructure to offer online EOG/EOC assessment.

Golden Leaf STEM initiative

Increase access to Science and Math content through specific technology. Conferences are scheduled to investigate the various tools that can enhance the STEM curriculum

1. Statewide Shared Services Model

| Suggested Goals/Targets | Year 1 July 1, 2012 – June 30, 2013 | Year 2 July 1, 2013 – June 30, 2014 | Yearly Eva Evaluation Method(s) | luation DPI Use |
|---|--|--|---|--------------------|
| Provide equitable and additional access to mobile devices | Provide 1-1 computing devices to students at grades 9-12. CTO and principals | Provide more computing devices to students in grades 3-8. CTO and principals | AMTR, Edenton- Chowan Schools Technology Survey, measuring the amount of time that students | |

| Provide equitable and additional access to digital resources | Research and provide digital resources for all grades, including Discovery Learning, insuring use of NC Wiseowl throughout the schools, and other emerging resources such as digital textbooks. CTO and Directors of Instruction | Provide online and e-learning software platforms as provided by the state with training for best use in the classroom. CTO, District Instructional Director | have access to computing device AMTR, Edenton- Chowan Schools Technology Survey, |
|---|---|---|--|
| Promote/maintain innovative funding model by utilizing NCEdCloud offerings and alternatives | Evaluate Cloud services for most cost efficient and best service for Edenton-Chowan schools CTO and Network Administrator | Evaluate Cloud services for most cost efficient and best service for Edenton-Chowan schools CTO and Network Administrator AMTR | Compare budgets to evaluate savings and product effectiveness |
| Maximize E-rate in support of instructional programs | File for e-rate discounts annually on WAN services, Internet access, cellular phone service including cellular data access, local and long distance phone service and other eligible services. CTO | File for e-rate discounts annually on WAN services, Internet access, cellular phone service including cellular data access, local and long distance phone service and other eligible services. CTO | ERATE 470/471 |
| Provide content filtering in accordance with the Children's Internet Protection Act (CIPA). | Continue to implement content filtering through a local solution or the NC Education Cloud CTO, Network Administrator | Continue to implement content filtering through a local solution or the NC Education Cloud CTO, Network Administrator | Reports from content filtering |
| Continue to upgrade Internet access, WAN services, and LAN services to accommodate the increasing demand of digital resources | Upgrade of all switches that are end of life and more than 6 years old. CTO, Network administrator | Analysis of network traffic to determine usage and speed to determine what upgrades are necessary, ie, switches, incoming Metro-E, etc CTO, Network administrator | Network monitoring reports to evaluate effectiness |

Strategic Priority 2: Universal Access to Personal Teaching and Learning Devices

Current Status and Moving Forward

Edenton-Chowan Schools is committed to universal access for all students and staff, which means providing needed computing devices to the students for engaging learning and for teachers to assist in the development and delivery of curriculum. It also provides for our students the ability to become globally connected at all times as well as providing constant learning and assessment opportunities. As quoted in the North Carolina State School Technology Plan of 2011-2013(NCSSTP), "universal access to personal teaching and learning devices refers to a computing device assigned to all members of the school, including administrators, teachers, and students."

The type of device assigned must be determined by what is the best fit for the student in that particular grade level, ie, iPads, laptops, iPods.

While the question of "why" seems to answer itself in today's world, some of the many reasons include:

- 1. Students need same access to the tools people use in today's business world, laptops, IPads, cellphones, etc. As stated in the NCSSTP, "...one-to-one personal teaching and learning device implementation can greatly foster the 21st century skills necessary for future-ready learners" and tomorrow's college students and tomorrow's workers.
- 2. Students are more engaged in the classrooms that have the 1-to-1 devices and discipline issues are minimal. It is important as students learn how to use the technology that they have the opportunity to "put their hands on the computing device" on a continuous basis, rather than only a few hours a week.
- 3. As the state assessments and formative assessments move to an online format, personal computing devices are needed to afford the students the time and access to these assessments.
- 4. As our world becomes "smaller and smaller," we need to be able to provide our students with opportunities of global collaboration.

The important piece of determining success for any 1-to-1 program of computing/personal devices is the professional development. Each school has a strong professional learning team model in place which will allow for further support for staff development training. The state also has assisted Edenton-Chowan through the IMPACT model implementation at DF Walker Elementary School, which we hope to apply at all schools in the district.

Strategic Priority 2: Universal Access to Personal Teaching and Learning Devices

Edenton-Chowan Schools will utilize and align with the following key initiatives/plans to reach for the vision and complete the strategic priorities of our plan...

ACRE

Continue to monitor the network as Edenton-Chowan moves to 1-to-1 computing devices Investigate grants and other resources to provide and replace 1-to-1 computing devices

Career and College Ready, Set, Go!

To participate in distance learning and Career and College promise courses, we will continue to provide students with the devices needed to have access in an ongoing and active basis.

Race to the Top Local and State Scopes of Work

Implement IIS-enhanced NC FALCON practices regarding the ongoing collection of student learning during instruction on a minute-by-minute, daily basis.

Golden Leaf STEM

Implement Golden Leaf STEM Initiatives that include professional development in math common core and science essential standards as well as inquiry-based learning.

Priority 2: Universal Access to Personal Teaching and Learning Devices

| Voar 1 | Vear 2 | Yearly Eve | aluation |
|---|---|--|---|
| July 1, 2012 – June 30, 2013 | July 1, 2013 – June 30, 2014 | Evaluation Method(s) | DPI Use |
| In collaboration with other | | 1 | |
| initiatives in the district, write | initiatives in the district, | network and | |
| a plan for upgrade of network | implement the upgrade of | survey data on | |
| to accommodate more | network to accommodate more | access | |
| personal devices and the purchase and replacement | purchase and replacement plan | availability. | |
| | In collaboration with other initiatives in the district, write a plan for upgrade of network to accommodate more personal devices and the | In collaboration with other initiatives in the district, write a plan for upgrade of network to accommodate more personal devices and the purchase and replacement July 1, 2013 – June 30, 2014 In collaboration with other initiatives in the district, implement the upgrade of network to accommodate more personal devices and the purchase and replacement plan | July 1, 2012 – June 30, 2013 In collaboration with other initiatives in the district, write a plan for upgrade of network to accommodate more personal devices and the purchase and replacement July 1, 2013 – June 30, 2014 Evaluation Method(s) In collaboration with other Reports from initiatives in the district, network and implement the upgrade of survey data on network to accommodate more access personal devices and the purchase and replacement plan |

| | CTO, Network administrator | CTO, Network administrator | |
|--|---|---|------|
| Increase overall access to personal learning devices. | Continue to seek outside funding resources to purchase and replace personal computing devices in order to afford each student a 1:1 device. CTO, District | Develop a plan to determine how best serve student in home use of personal devices. CTO, District | AMTR |
| Utilize Personal Learning Devices to promote student owned learning. | Using professional learning teams, online staff development, face to face instruction and other methods of professional development, provide teachers the tools | teams, online staff development, face to face instruction and other methods of professional development, provide teachers the tools needed to use the personal computing devices in the classrooms and in the | STNA |

Strategic Priority 3: Statewide Access to Digital Teaching and Learning Resources, Including Digital Textbooks

Current Status and Moving Forward

Edenton Chowan Schools strives to use the IMPACT model of collaboration to identify and align digital teaching and learning resources for teachers and students. The traditional textbook model is being quickly replaced various resources that support problem based learning and connect teaching and learning to relevant aspects of community and world issues. Web 2.0 tools will add a visual/auditory dimension to teaching and learning that has been difficult at achieve without technology. Continuous investigation into the various ways to implement the use of digital textbooks and the proper tools in the classroom has been examined.

Edenton Chowan Schools has made a concerted effective to transfer to online testing, insuring the proper equipment is in place and assistance with the teachers to insure they are comfortable with the new mode of testing. This includes benchmark testing for students.

Strategic Priority 3: Statewide Access to Digital Teaching and Learning Resources, Including Digital Textbooks

Edenton Chowan Schools will utilize and align with the following key initiatives/plans to reach for the vision and complete the strategic priorities of our plan...

ACRE

Career and College Ready, Set, Go!

Use of multiple online courses and various sites, including, NCVPS, College of The Albemarle, and Oregon State University Race to the Top Local and State Scopes of Work

Promote and provide teacher and student access to the Instructional Improvement System and Learning Object Repository Other LEA initiatives/plans

Continual upgrade of network to provide the digital resources in a manner that enhances instruction

3: Statewide Access to Digital Teaching and Learning Resources, Including Digital Textbooks Goals should be precise and measurable. See notes/guidelines regarding evaluation.

| | Year 1 | Year 2 | Yearly Evaluation |
|--|--|--|---|
| Suggested Goals/Targets | July 1, 2012 – June 30, 2013 | July 1, 2013 – June 30, 2014 | Evaluation Methods(s) DPI Use |
| Shift from traditional print and paper-based resources to affordable, current online resources | Continue collaborative session and planning to identify and align digital sources. Media/Technology/Instructional support personnel, Principal, | | STNA, Local Technology Survey which has been given for the last 8 years |
| Utilize procured resources such as NC WiseOwl, and other open education resources | the IIS system. | Increase the use of Moodle and other web based tools. Also use the IIS system. Continue to investigate and use | STNA, Local technology survey |

| | the instructional resources needed in the district CTO, Media Coordinators | the instructional resources needed in the district CTO, Media Coordinators |
|--|--|---|
| Use digital content aligned specifically to Common Core and NC Essential Standards | site and the district LAN to promote online resource for the Common Core and Essential | Continue to use the district web STNA, Local site and the district LAN to technology promote online resource for the survey Common Core and Essential |
| | Standards. | Standards. |

Strategic Priority 4: A Statewide Model of Technology-Enabled Professional Development

Current Status and Moving Forward

Edenton Chowan Schools has a history of ongoing staff development through a variety of means including, but not limited to professional learning communities, collaborative planning, and administrative leadership in the area of technology. This has afforded the staff the opportunity to learn, use, and integrate new technology skills as they become available. Understanding that with any staff development must consider time, leadership support, and financial resources, professional learning teams and collaboration are extremely effective in implementation of new programs, new resources, and the review of "best practices." Teachers are always in need of differentiation in professional development and learning teams can accommodate this issues.

While Edenton Chowan is still working on the implementation of the IMPACT model in each school, the teachers and media folks work together to introduce and implement the 21^{st} century skills for teaching, learning, and managing instruction. The use of classroom web pages, NC Wise grade book, wikis, Skype, and other 21^{st} century tools and quickly being implemented through the initiative of the district level instructional technologist and the DF Walker Elementary instructional technologist.

Strategic Priority 4: A Statewide Model of Technology-Enabled Professional Development

Edenton Chowan Schools will utilize and align with the following key initiatives/plans to reach for the vision and complete the strategic priorities of our plan...

ACRE

Provide professional development in technology integration in the area of Common Core and Essential Standards

Career and College Ready, Set, Go!

Continue to provide online courses for professional development

Race to the Top Local and State Scopes of Work

Continue to participate in NC Ed and NC Falcon. Provide staff development in the IIS

Other LEA initiatives/plans

Continually assess the needs in the area of staff development

4: A Statewide Model of Technology-Enabled Professional Development

| | Year 1 | Year 2 | Yearly Eva | luation |
|--|--|--|--|---------|
| Suggested Goals/Targets | July 1, 2012 – June 30, 2013 | July 1, 2013 – June 30, 2014 | Evaluation Method(s) | DPI Use |
| Implement a plan for embedded technology-enabled professional development for teachers and administrators. | Directors in the implementation of the Common Core and Essential Standards as | Work closely with the Curriculum Directors in the implementation of the Common Core and Essential Standards as technology is embedded into the lessons and plans. CTO, Media Coordinators | Template devised for lessons includes the implementation of technology in the lesson | |
| Support models that promote and further the ideals of technology-enabled and integrated professional development | Implement the 1 to 1 classrooms at multiple grade levels, beginning at the high school. CTO | Implement the 1 to 1 classrooms at multiple grade levels, beginning at the high school. CTO | STNA | |

| Prepare media specialists and | Continue to send media | Continue to send media | Local |
|---------------------------------|------------------------------------|------------------------------------|-------------|
| instructional technology | coordinators and technology | coordinators and technology | Technology |
| facilitators to support digital | facilitators to conferences and | facilitators to conferences and | Surveys and |
| reform. | workshops. | workshops. | STNA |
| | CTO | CTO | |
| Prepare staff for online | Provide training in online testing | Provide training in online testing | Local |
| assessment delivery. | for benchmark and summative | for benchmark and summative | Technology |
| | testing in high school and middle | testing in high school and middle | Surveys and |
| | school including the IIS | school including the IIS | STNA |
| | CTO, Media Coordinators, Tech | CTO, Media Coordinators, Tech | |
| | Facilitators | Facilitators | |
| Provide ongoing support and | Continue in each school, to | Continue in each school, to | Local |
| professional development | inform and assist each teacher in | inform and assist each teacher in | Technology |
| necessary for use of data to | the use of data to work with each | the use of data to work with each | Surveys and |
| inform instruction. | child to insure success. | child to insure success. | STNA |
| | CTO, Curriculum Directors, | CTO, Curriculum Directors, | |
| | Principals, Media Coordinators, | Principals, Media Coordinators, | |
| | Technology Facilitators | Technology Facilitators | |
| | | | |

Strategic Priority 5: 21st Century Leadership for All Schools and Districts

Current Status/Moving Forward

Most evaluation toosl, including the MCREL teacher evaluation instrument, include information on the teachers' use of technology use in the classroom. The district level instructional technologist works on a continuous basis in the school in the classroom, with teachers and students to pilot various tools, present WEB 2.0 resources, and show our teachers how to integrate the resources into their curriculum and teaching strategies.

Edenton Chowan has always prided itself in the "way we do business" with certain "best practices." This includes professional learning teams, study of the best way to insure success for students, differentiation of instruction, and the use of technology in the area of the classroom and in administrative use. Opportunities such as conferences, workshops, webpage information, emails from the district instructional technologist that encourage teachers to highlight their technology "best practices," faculty meetings that include a "mini tech lesson," lunch bunch instruction, and other opportunities to allow the teachers and staff to learn more about emerging technology.

Strategic Priority 5: 21st Century Leadership for All Schools and Districts

Edenton Chowan Schools will utilize and align with the following key initiatives/plans to reach for the vision and complete the strategic priorities of our plan...

ACRE

Continue to provide staff development session to assist teachers and staff in the best use of technology.

Career and College Ready, Set, Go!

Increase online professional development opportunities

Race to the Top Local and State Scopes of Work

Support the Common Core and Essential Standards implementation and assist teachers in the understanding of "best practices" in technology integration into the curriculum

Other LEA initiatives/plans

Provide professional development to administrators in the 1:1 schools

5: 21st Century Leadership for All Schools and Districts

| | Year 1 | Year 2 | Yearly Evaluation |
|---|--|--|-------------------------------|
| Suggested Goals/Targets | July 1, 2012 – June 30, 2013 | July 1, 2013 – June 30, 2014 | Evaluation Method(s) DPI Use |
| Create and lead a vision for 21 st century education | century education through all local initiatives, school improvement plans, through media and technology staff. | local initiatives, school improvement plans, through media and technology staff. CTO, Media Coordinators, | Local Technology |
| Create 21 st century learning cultures | Professional Learning Teams in each school and the work that the | Through continued use of the Professional Learning Teams in each school and the work that the media/technology staff does with | Technology |

| Develop strategic partnerships with community and business to promote 21 st Century learning. | of 21 st Century learning will be implemented CTO, Media/Technology Staff Through the Golden Leaf STEM grant, partnerships will be maintained with the businesses and the industries in the area as work is done to provide opportunities to expose students | Through the Golden Leaf STEM grant, partnerships will be maintained with the businesses and the industries in the area as work is done to provide opportunities to expose students and teachers in the area of STEM. CTO, STEM Coordinator, | prepared for |
|--|---|---|--------------|
|--|---|---|--------------|

Appendix A: Policies and Procedures <a href="LEA

| translated into predominant languages of students and parents. Policies, procedures and guidelines should be displayed along with the STP and other referenced LEA/Charter plans. Make sure links have navigations that are user friendly. | LEA Policy Code or Procedure | Adoption, Implementati on or Revision Date |
|--|------------------------------------|--|
| Policies Required | | |
| A. Materials Selection Policy including internet resources (GS §115c-98(b)) | Code Name/# | Month/Year |
| B. Disposal of Equipment / Replacement of Obsolete Equipment (GS §115c-518) | Code Name/# | Month/Year |
| C. Hardware and Software Procurement (GS § 115c-522, 115c-522.1) | Code Name/# | Month/Year |
| D. Copyright and Plagiarism Policy (PL §94-553, 90 Stat. 2541), | Code Name/# | Month/Year |
| E. Acceptable Use Policy (PL §106-554) (including existing 1:1, bring your own device) | Code Name/# | Month/Year |
| F. Equipment/Materials Donation Policy (GS §115C-518) | Code Name/# | Month/Year |
| G. Data Privacy Policy (20 U.S.C. § 1232g; 34 CFR Part 99 (FERPA)) | Code Name/# | Month/Year |
| H. Inventory Control Policy (GS §115c-539, 115c-102.6A-C(5)) | Code Name/# | Month/Year |
| I. Access to Services Policy (GS §115c-106.2) | Code Name/# | Month/Year |
| J. Online Assessment and Instruction Policy | Code Name/# | Month/Year |
| K. Advertising and Commercialism Policy (GS §115c-98) (Procurement and gifts ethics) | Code Name/# | Month/Year |
| L. Internet Safety and Ethical Use including Cyberbullying and Harassment | | |
| (Protecting Children in the 21 st Century Act, CIPA, FERPA, GS 115C-407) | Code Name/# | Month/Year |
| (Locally identified policies) | | |
| Procedures | | |
| A. Hardware and Software Deployment | | |
| B. Equipment maintenance and repairs | | |
| C. Outdated Resources and Equipment Replacement | | |
| D. Disaster Recovery of Data and Hardware | | |
| E. Administration of Online Courses | | |
| F. Administration of Online Assessment | | |
| (Locally identified procedures) | | |
| | | |
| Guidelines | | |
| A. Policy Translation | | |
| B. Use of Digital Media and Resources | | |
| C. Instructional Use of Videos | | |
| D. Development of Online Resources | | |
| (Locally identified guidelines) | | |
| | | |