

DEPARTMENT OF PLANNING AND NATURAL RESOURCES

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS

DIVISION OF LIBRARIES, ARCHIVES AND MUSEUMS

**A Five Year Technology Plan for Public Libraries in the
U.S. Virgin Islands 2018-2022**

IN ACCORDANCE WITH THE LIBRARY SERVICES AND TECHNOLOGY ACT (LSTA)

Submitted by:

Department of Planning and Natural Resources

Division of Libraries, Archives, and Museums

Table of Contents

Introduction	(pg. 3)
Territorial Library Agency - Background	(pg. 4)
Vision	(pg. 5)
Mission Statement	(pg. 5)
Needs Assessment	(pg. 5)
FY 2018-2022 Goals and Objectives	(pg. 6)
Goal I: Expand basic library services to address the needs of the community due to the effects after Hurricanes Irma and Maria (LSTA Purposes 1, 5 and 6)	(pg. 6)
Goal II: Identify and establish quantitative and qualitative data gathering protocols, outcome measurement strategies and reporting criteria for monitoring, evaluating and improving public library services, programs and project (LSTA Purposes 7 and 8)	(pg. 7)
Goal III: Provide educational opportunities for library personnel (LSTA Purposes 1, 3, and 8)	(pg.7)
Goal IV: Continue to expand on the scope of the Virgin Islands Automated Library System (VIALS) (LSTA Purposes 1, 2, 3, 4, and 7)	(pg. 9)
Goal V: Expand on the partnership with viNGN to connect people with Technology, Digital Literacy, and access to the Virgin Islands Public Library System	
Collections Online (LSTA Purposes 1, 2, 4, and 7)	(pg. 10)
Coordination Efforts (Programs and Activities)	(pg. 11)
Crosswalk to IMLS Focal Areas	(pg. 12)
Evaluation Plan and Monitoring Procedures	(pg. 13)
Stakeholder Involvement	(pg. 13)
Communication and Public Availability	(pg. 14)
Monitoring Procedures	(pg. 14)
Assurances	(pg. 15)
Conclusion	(pg. 15)
APPENDIX A	(pg.16)

Library Services and Technology Act

U.S. Virgin Islands Five-Year Plan 2018-2022

Introduction

Within this outlined document is the Library Services and Technology Act Five-Year State Plan for the U.S. Virgin Islands for implementation during the 2018-2022 period (October 1, 2018— September 30, 2022). The Library Services and Technology Act (LSTA) program promotes access to information resources provided by all types of libraries and is administered by the Institute of Museum and Library Services (IMLS).

The IMLS Grants for States Program under which state library administrative agencies (SLAAs) receive LSTA allotments requires each State Library Administrative Agency (SLAA) to submit a five-year plan that identifies the State and Territory library needs and the goals and activities that will be utilized to address these needs.

The U.S. Virgin Islands library community consists of various types of libraries (K-12 school libraries, academic libraries, law libraries, including a library for the Blind and Physically Handicapped), many of which collaborate and share resources to better serve their patrons, constituents, and residents.

In preparation for its Five-Year Plan for the years 2018 through 2022, the Virgin Islands Public Library System (VIPLS) has reviewed a variety of information resources to understand both the constraints that libraries face and the opportunities that libraries can leverage to better serve the residents of the Virgin Islands. These findings will inform the establishment of priorities for the use of (LSTA) funds allotted to the U.S. Virgin Islands.

The VIPLS has used prior LSTA funds effectively to meet the needs of the VIPLS in a manner consistent with LSTA priorities, to promote the development of library services at the local level, and to provide access to electronic resources and other significant collections.

The IMLS LSTA program was reauthorized at the federal level in 2010 and will remain in effect through 2022. Program objectives for 2018-2022 are set forth in 20 U.S.C. § 9141(a) (1-8). Each goal in the following Virgin Islands LSTA Five-Year State Plan will address one or more of these objectives.

Notwithstanding the challenges of two Category 5 Hurricanes, namely Hurricanes Irma and Maria within two (2) weeks of each other, the Department of Planning and Natural Resources Division of Libraries, Archives, and Museums may need to reassess its Five Year Plan once normalized.

Territorial Library Agency - Background

The United States Virgin Islands is located 1,100 miles from the North American continent between the Atlantic Ocean and the Caribbean Sea. The islands, a territory of the United States, are made up of four major landmasses surrounded by approximately one hundred smaller islands and tiny cays. The four major islands are St. Croix, St. Thomas, St. John and the fourth, Water Island, which was turned over to the USVI from the Department of Interior in the year 2000. Located just a half mile off the south side of St. Thomas, Water Island is served by St. Thomas Government Offices. The capitol of the USVI is Charlotte Amalie, which is located on St. Thomas. The islands' population is approximately 111,000 people of which almost 80% are of African Heritage. The diverse population includes groups representing East Indian, Caucasian, Chinese, Arab, Haitian and Hispanic.

Administration of the Library Services and Technology Act is the responsibility of the Territorial Library Agency. This agency, the Division of Libraries, Archives and Museums (DLAM), is administered by the Executive Branch of the Government of the Virgin Islands through its Department of Planning and Natural Resources, and is the designated SLAA.

Territory-wide, no distinction is made between the local and state (territorial) levels. DLAM participates in the direct provision of public library service as well as in the administrative, centralized technical, online services and systems functions. In addition to the four major public libraries located throughout the three major Virgin Islands, DLAM also operates two bookmobiles (a third will be operational on St. John in the near future). A Regional Library for the Blind and Physically Handicapped is also located on St. Croix. DLAM also oversees the Territorial Archives, special collections of Virgin Islands materials and a photo duplication/digitization lab, where local newspapers and other Virgin Islands government documents are microfilmed, digitized and duplications of old photographs are made.

Vision

Free and open access to information for all residents of the United States Virgin Islands is essential. DLAM's projected priorities as outlined in this report aim

- To improve the ability of libraries to provide public service to all; and
- To enhance and improve its library services through technological advances.

Mission Statement

It is the mission of the Division of Libraries, Archives and Museums to:

- provide service, information and other resources to the Government of the United States Virgin Islands;
- support the development of an informed citizenry by providing access to a world of ideas and information;
- identify, preserve and promote the historical, cultural and public records of the United States Virgin Islands; and
- provide support to all residents of the United States Virgin Islands in their pursuit of learning.

Information and resources are provided to the Government of the United States Virgin Islands and the residents of the U.S Virgin Islands through several means. Each year provides DLAM the opportunity to improve its facilities in order to effectively serve the needs of library patrons. With the advancement of technology and the ever present need to update library materials while steadily offering the new, there is always room for improvement in all areas pertaining to Virgin Islands public libraries.

Needs Assessment

Of the approximately 111,000 persons living in the Virgin Islands, according to the Virgin Islands Department of Health, The Virgin Islands, consisting of St. Thomas, St. John, St. Croix and Water Island, have close to one-third of their population below the poverty level.

While the U.S. economy grew at a record pace in the 1990s, contributing to the lowest child poverty rate in over 20 years, (2005 Poverty Rate = 35% US Census = 35 of every 1000 people are at poverty level) the economic conditions for children and families in the U.S. Virgin Islands continues to deteriorate. The percentage of children in families with incomes below the poverty line continues to increase. .

The Virgin Islands has not established its literacy rate. Linkages can and have been made between the levels of education and the type of library service available to a community. Virgin Islands public libraries, under the current levels of funding and staffing continue to provide a minimal level of service only.

The people of the Territory, however, particularly the young adults and children are targeted populations by default because they make up approximately 1/3 of the population. They require a highly proactive public library system, one focused on the planning, organizing implementation of services to meet their needs in the immediate and long term. All persons in the Territory, no matter the social or economic status, are served by the same public library system.

LSTA funds are used to supplement the local government's appropriations and allocations to its public libraries. LSTA funds fuel the initiatives necessary to provide the people of the territory with a level of library service that meets their needs.

The following goals, listed in priority, illustrate how the FY 2018-2022 LSTA Five-Year State Plan for the U.S. Virgin Islands addresses each of LSTA required elements.

FY 2018-2022 Goals and Objectives

Goal I: Expand basic library services to address the needs of the community due to the effects after Hurricanes Irma and Maria (Addresses LSTA Purposes 1, 5 and 6)

- Objective 1: Develop partnerships with local shelters, schools, and non-profit groups and organizations to offer basic library services to members of the community
- Objective 2: Develop partnerships with Virgin Islands Governmental Agencies to assist with job training, digital literacy skills, and other support services needed to succeed in the labor market after job displacement due to Hurricanes Irma and Maria
- Objective 3: Develop partnerships with local churches through their membership to establish basic literacy programs with their church

The three major tasks areas that will improve basic library services to those affected after Hurricanes Irma and Maria are set forth as objectives one through three above.

In order to accomplish these objectives, these tasks will require involvement all library staff/partners, assistance of volunteers, and the support of other Virgin Islands Governmental Agencies.

Timeline: Years 1-5

Evaluation: Continued growth and partnership with other VI Governmental Agencies

Goal II: Identify and establish quantitative and qualitative data gathering protocols, outcome measurement strategies and reporting criteria for monitoring, evaluating and improving public library services, programs and projects. (Addresses LSTA Purpose 7 and 8)

- Objective 1: Contract with a consultant to perform an assessment of library services and suggest best practices, specific techniques, professional standards and guidelines for data monitoring and recording.
- Objective 2: Analyze performance metrics data routinely (at not less than annual intervals) and prepare reports and recommendations based on same for DLAM and for release to the Virgin Islands community.
- Objective 3: Contract with an independent consultant to perform the IMLS LSTA Five-Year State Plan Evaluation for 2018 -2022.
- Objective 4: Contract with an independent consultant to assist with filing for subsidized funding offered by Universal Schools Administrative Corporation (USAC) also known e-rate.

With the recent changes and reporting enhancements for the Five-Year State Plan Evaluations, the VIPLS realizes that it is imperative that these data be identified, monitored and reported on a routine basis in order to properly disclose information needed to prepare the Five-Year Evaluation. VIPLS will seek an

independent consultant to help identify critical benchmarks in the LSTA goals it proposes to undertake, and what and how to measure in the processes that exist and in those that must yet be designed and built. In addition, the VIPLS will seek the consultant's advice on how best to gather qualitative input from community stakeholders, and how to ensure data validity and reliability.

At the conclusion of the LSTA grant period, the independent consultants will rely on the data reports, analyses, surveys and other data-gathering instruments developed, produced and maintained over the grant term for preparing the Five-Year Evaluation.

Timeline: Years 1-5

Evaluation: Regularized reporting cycles, establishment of data gathering parameters and responsibilities, and periodic and end-of-term evaluations.

Goal III: Provide educational opportunities for library personnel (Addresses LSTA Purposes 1, 3, and 8)

- Objective 1: Enhance the knowledge of library personnel, which will grant them an opportunity to attending trainings and educational seminars, such as Annual Library Association (ALA) and Public Library Association (PLA) Annual Conferences
- Objective 2: Participate in webinars, online courses, certified programs and other professional courses offered at various Academic Institutions

Timeline: Years 2-5

Evaluation: Through Departmental and Division monitoring, work productivity evaluations, statistics and data collection, along with public surveys.

Goal IV: Continue to expand on the scope of the Virgin Islands Automated Library System (VIALS) (Addresses LSTA goals 1, 2, 5, and 7)

- Objective 1: Reconstitute and authenticate the VIALS subject authority listings.
- Objective 2: Reestablish within Symphony the Community Information and Newspaper index capability.
- Objective 3: Perform an inventory of all major collections, in order to reconcile the holdings against the VIALS online catalog.
- Objective 4: In collaboration with the Archives section of DLAM, develop workable definitions of the elements of the current special collections of Caribbean holdings that will foster the development and promulgation of approved policies and best practices addressing custodial care, security description, handling, collection development, storage location, preservation and conservation of those materials throughout VIPLS.

- Objective 5: Improve access through technology of library and archival information for persons with visual and hearing impairments

VIALS is the divisional library technological network. All library branches utilize the Sirsi-Dynix form of the MARC catalog and a Windows-based network maintained centrally at the territorial library's main offices in St. Thomas. The VIALS network provides internet service, email, printing, desktop services and technical support to staff and public users. It is the backbone of DLAM and is heavily supported by LSTA. VIALS responsibilities include the purchase and upgrade of all divisional hardware and software titles.

The five major tasks areas that will optimize the functionality of the ALS are set forth as Objectives One through five above. In order to accomplish these objectives, these tasks will require external support in the form of specialized cataloging services and the purchase of Library of Congress Authority Files, as well as equipment and software for disabled library patrons.

Timeline: Years 1 – 5

Evaluation: Continued growth and strength of VIALS

Goal V: Extend on the partnership with viNGN (Virgin Islands Next Generation Network) to connect people with Technology, Digital Literacy, access to Virgin Islands Collections Online, and continue to expand on the scope of the Virgin Islands Automated Library System (VIALS) (Addresses LSTA Purposes 1, 2, 4, 7, and 9)
Continue to expand on the scope of the Virgin Islands Automated Library System (VIALS) (Addresses LSTA goals 1, 2, 4, 7, and 9)

- Objective 1: Strengthen partnership with viNGN to enhance greater library usage by the general public to include young professionals, seniors, and
- Objective 2: Develop partnership with other Virgin Islands Governmental Agencies and Semi-Autonomous Agencies to engage residents to participate at library events and programs
- Objective 3: Develop potential partnership with local radio stations and Virgin Islands Government Television Channels to implement public service announcements to attract and inform younger students, and all residents about library services, and library community outreach initiatives
- Objective 3: Perform an inventory of all major collections, in order to reconcile the holdings against the VIALS online catalog
- Objective 4: In collaboration with the Archives section of DLAM, develop workable definitions of the elements of the current special collections of Caribbean holdings that will foster the development and promulgation of approved policies and best practices addressing custodial care, security description, handling, collection development, storage location, preservation and conservation of those materials throughout VIPLS.

Timeline: Years 1-5

Evaluation: Perform a territorial survey in Year 1 to determine a baseline of awareness of and satisfaction with public library programs and services in the Territory, including the perception of library user needs and wants. Establish measurable and performance based outcomes for all library programs and initiatives and share this information with the community through press releases, public presentations, and periodic reports. Promulgate and collect evaluation forms for all library programs and specialized services, and share this information with the participants and wider community. Monitor and track trending data and commentary from same. Issue reports on activities and recommendations of each Citizen's Advisory Board at least annually and share this information publicly.

Coordination Efforts (Programs and Activities)

The viNGN Public Computer Centers provides free public access of technology services to the general public. Through a partnership with the National Education Foundation, 2, 9595 people in the Territory completed the Cyber learning Digital Literacy Course, and 2, 168 licenses were issued/activated as residents went on to access over 5,000 advanced/higher tiered course and receive certificates backed by the State University of New York at Potsdam (program concluded October 2015). Post-Grant viNGN continues to invest in the Virgin Islands future with frequent outreach activities at the Virgin Islands Public Libraries Public Computer Centers and behalf of civic and community groups and government agencies.

A lesson learned from the previous Five-Year State Plan is the value of partnerships. Between 2013 and 2017 VIPLS through DLAM collaborated closely with numerous other governmental agencies, and organizations Territory-wide. VIPLS regularly partnered with the Office of the Governor and with other Divisions within the Department of Planning and Natural Resources, the Virgin Islands Council on the Arts, the VI Humanities Council, Department of Education and Rotary International. The most successful partnership was with the Office of the Governor Summer Reading Challenge. The support and collaborations were invaluable in the planning and implementation of programs. When appropriate, DLAM worked with individual libraries to coordinate resources, programs, and activities for the benefit of library users Territory-wide.

CROSSWALK TO IMLS FOCAL AREAS

IMLS FOCAL AREA

USVI PUBLIC LIBRARY SYSTEM LSTA PLAN

- LIFELONG LEARNING
- Improve users' formal education
- Improve users' general knowledge and skills

USVI Public Library System Goal No. 3:

Improve Public Outreach Services at all Virgin Islands Public Libraries, in combination and partnership with public, private, parochial schools, senior centers, homeless shelters, home school persons, individuals with special needs and other programs.

(Addresses LSTA Purposes 1, 4, 5, 6, and 7)

- Strengthen students, and adults programs
- INFORMATION ACCESS
- Improve users' ability to discover information resources
- Improve users' ability to obtain and/or use information resources

USVI Public Library System Goal No. 5:

Expand on the partnership with viNGN to connect people with Technology, Digital Literacy, and access to the Virgin Islands Collection Online.

(Addresses LSTA Purposes 1, 2, & 4)

- Expand access to technology/information
- INSTITUTIONAL CAPACITY
- Improve the library workforce
- Improve the library's physical and technological infrastructure
- Improve library operations

USVI Public Library System Goal No. 4

Implement the Laura Bush 21st Century Librarian Program for residents of the Territory who may be eligible **(Addresses LSTA Purposes 3)**

- Continuing Education Opportunity to the field of Librarianship and Information of Technology Services

- ECONOMIC & EMPLOYMENT DEVELOPMENT

- Improve users' ability to use resources and apply information for employment support
- Improve users' ability to use and apply business resources

USVI Public Library System has not targeted this IMLS Focal Area. However it is anticipated that the continued partnership with viNGN in **Goal No. 3, and 5**, will address this area in part.

- HUMAN SERVICES
- Improve users' ability to apply information that furthers their personal, family, or household finances
- Improve users' ability to apply information that furthers their personal or family health & wellness
- Improve users' ability to apply information that furthers their parenting and family skills

USVI Public Library System has not targeted this IMLS Focal Area. However it is anticipated that the continued partnership with viNGN in **Goal No. 3, and 5**, will address this area in part.

- CIVIC ENGAGEMENT
- Improve users' ability to participate in their community
- Improve users ability to participate in community conversations around topics of concern

USVI Public Library System Goal No. 3:

Improve Public Outreach Services at all Virgin Islands Public Libraries, in combination and partnership with public, private, parochial schools, senior centers, homeless shelters, home school persons, individuals with special needs and other programs.

(Addresses LSTA Purposes 1, 4, 5, 6, and 7)

- Strengthen students, and adults programs

Evaluation Plan and Monitoring Procedures

DLAM will use a variety of methods to measure progress towards meeting each of the goals for 2018-2022 by: 1) utilizing multiple evaluation approaches; 2) drawing on both qualitative and quantitative methodologies; 3) employing multiple evaluative research methods including document review, observations, surveys, interviews, and focus groups; and 4) triangulating data, where possible, for more robust findings.

The focus of the 2013-2017 Plan included user-level data to ascertain perceptions, effectiveness, benefits, and quality of service from library programs. However, the most recent evaluator commented on the excessive amount of data collection and staff time required to gather the indicator data. As a result, the focus of the 2018-2022 Five-Year State Plan will attempt to balance the reporting at the local, territory-wide library level for a variety of means.

In order to properly evaluate the various programs and services supplemented by the LSTA grant, librarians, library users, and Friends of the Public Library were surveyed. Patrons and the general public were asked to complete surveys related to specific programs. Those surveys queried impressions and effect of past programs while also soliciting suggestions or needs for future ones. The availability of local library and professional consultants will also be utilized in this process.

Stakeholder Involvement

Though the organizational chart and makeup of DLAM calls for a Library Advisory Board, persons have not been appointed to this role since the 1980's. Instead the advisory role has been informally accomplished with interactions between DLAM and the various organizations comprised of librarians. These include the St. Croix Library Association, the St. Thomas/St. John Library Association and the Virgin Islands Library Association. These organizations bring together all persons working in the library field, whether it be in school, academic or public libraries, professionals or para-professionals. The services and programs offered at the public libraries impact all of these groups.

The shortage of librarians in the territory is critical. With the establishment of the University of the Virgin Islands/University of Pittsburgh Master's degree program for Virgin Islands residents, funded by an IMLS grant, an additional professional cohort is now available within the Virgin Islands. More than 20 participants graduated from the MLIS program and are available for employment by territorial libraries, including the public libraries, as job vacancies are posted.

While the professional library community input was garnered in selecting and prioritizing the LSTA goals, that community will regularly be updated on the progress or problems involved with seeing the plan to fruition. The DLAM website is also key in alerting the public and the various professional organizations about the programs offered at local public libraries.

The LSTA Five-Year State Plan Evaluation for 2013-2017 produced by an independent consultant for VIPLS/DLAM also served as an important resource for the LSTA Five-Year State Plan 2018-2022.

DLAM and its management team, which includes the LSTA Coordinator for the Virgin Islands, will ensure that the execution of the Five-Year State Plan is coordinated with the strategic planning, priorities, and collaborative plan of VIPL Territory-wide.

Communication and Public Availability

After the 2018-2022 Five-Year State Plan has been submitted to and approved by IMLS, it will be published for dissemination to the library community through the Department of Planning and Natural Resources website and remain accessible online to the public throughout the period of the Five-Year State Plan.

DLAM management and staff responsible have been identified and responsibilities designated for implementing, continuously tracking, evaluating, and monitoring progress of the 2018-2022 Five-Year State Plan. DLAM management is also responsible for and tasked with the timely production and submission of progress and evaluation reports that coincide with the preparation of the annual State Program Report to IMLS.

This charge will include collecting required financial reports, final narrative reports for all LSTA projects and programs undertaken, and onsite monitoring for programs. The LSTA Coordinator and DLAM management will be responsible for assuring that all projects are completed in accordance with the Act and IMLS requirements, that the State Program Report is completed in a timely fashion, and that the Five-Year Evaluation is completed according to the provisions of LSTA.

Monitoring Procedures

DLAM's Five-Year State Plan and procedures for using the LSTA funds is different to that of other states and areas. There are no sub-grantees in the VIPL LSTA model. DLAM receives and utilizes the granted funds to benefit the four public libraries, two bookmobiles, and one regional library for the blind and physically handicapped operating in the territory. Financial reports are undertaken by the business arm of the Department of Planning and Natural Resources, the parent agency of DLAM. DLAM, particularly its IT Systems Office/LSTA Coordinator and Library Staff and the Territorial Director of Libraries will keep the Commissioner of the Department of Planning and Natural Resources informed on the goals outlined in the plan.

LSTA funds play an ever-increasing role in the ability of DLAM to serve its community. In the past, LSTA funds enabled DLAM to upgrade the libraries' network and upgrade the capability of the library to digitize and provide easy access to the library's valuable collection of microfilm. Continued funding is essential to the accomplishment of DLAM technology goals for the Territory and to position DLAM to undertake more programmatic use of LSTA funds.

Assurances

The required signed certifications and assurances are hereby submitted with the original plan to the Institute of Museum and Library Services, State Programs, 1800 M Street NW, 9th Floor, Washington, DC, 20036-5802.

Conclusion

Territory-wide, due to financial constraints and changing circumstances, not all of the ambitious goals set out in VIPLS's Five Year Plan 2013-2017 were not accomplished. The most significant of those goals were partially addressed. Moving forward, the Virgin Islands Public Library System has established a firm foundation for future growth and development of quality library services throughout the U.S. Virgin Islands.

Over the next funding period, VIPLS will continue to examine the information needs of Virgin Islanders and developments in library and information services with DLAM's oversight and guidance. The surrounding organizational environment will be analyzed and evaluated to determine, on an ongoing basis, how well DLAM's LSTA initiatives are serving VIPL and the wider communities of its patrons and the general public. Periodic surveys and stakeholder meetings will determine the need to adjust and realign priorities to make the most effective use of LSTA funds in the Virgin Islands.

APPENDIX A

The 2003 Reauthorization of the Museum and Library Services Act of 1996 (20 U.S.C. Chapter 72 Section 9141) specifies that a state library administrative agency (SLAA) shall expend funds for one or more of the following purposes:

- Expand services for learning and access to information and educational resources in a variety of formats, in all types of libraries, for individuals of all ages in order to support such individuals' needs for education, lifelong learning, workforce development, and digital literacy skills;
- Establish or enhance electronic and other linkages and improve coordination among and between libraries and entities, as described in 20 U.S.C. § 9134(b)(6), for the purpose of improving the quality of and access to library and information services;
- (a) provide training and professional development, including continuing education, to enhance the skills of the current library workforce and leadership, and advance the delivery of library and information services, and (b) enhance efforts to recruit future professionals to the field of library and information services;
- Develop public and private partnerships with other agencies and community-based organizations;
- Target library services to individuals of diverse geographic, cultural, and socioeconomic backgrounds, to individuals with disabilities, and to individuals with limited functional literacy or information skills;
- Target library and information services to persons having difficulty using a library and to underserved urban and rural communities, including children (from birth through age 17) from families with incomes below the poverty line (as defined by the Office of Management and Budget and revised annually in accordance with 42 U.S.C. § 9902(2)) applicable to a family of the size involved;
- Develop library services that provide all users access to information through local, state, regional, national, and international collaborations and networks; and
- Carry out other activities consistent with the purposes set forth in 20 U.S.C. § 9121, as described in the SLAA's plan.