

[Back](#) [header](#)

Schools and Libraries News Brief

December 11, 2009

FY2010 WINDOW COUNTDOWN

Days to window close	62
Forms 470 filed to date	15,827
Forms 471 filed to date	433

TIP OF THE WEEK: If you plan to post a Form 470 for FY2010, you should do so promptly. **January 14, 2010** is the last day you can POST a Form 470 to the USAC website and still comply with the 28-day waiting period under the competitive bidding requirement.

Commitments for Funding Years 2009 and 2008

Funding Year 2009. USAC will release FY2009 Wave 32 Funding Commitment Decision Letters (FCDLs) December 15. This wave includes commitments for approved Priority 2 requests (Internal Connections and Basic Maintenance of Internal Connections) at 80% and above and denials at 54% and below. As of December 11, FY2009 commitments total just under \$1.69 billion.

Funding Year 2008. USAC will release FY2008 Wave 75 FCDLs December 16. This wave includes commitments for approved Priority 2 requests at 87% and above and denials at 86% and below. As of December 11, FY2008 commitments total just under \$2.45 billion.

On the day the FCDLs are mailed, you can check to see if you have a commitment by using USAC's [Automated Search of Commitments](#) tool.

First Consortium Files FY2010 Forms 471

Congratulations to the first consortium that filed and certified Form 471 for FY2010 online! Applicants that file early have a much better chance of being included in the earliest funding waves for a funding year.

The first successful online consortium filer was:

- **First consortium:** Great Western Network, Washburn, North Dakota

First FY2010 RALs Issued

The first batch of FY2010 Form 471 Receipt Acknowledgment Letters (RALs) for applicants and service providers were issued yesterday, December 10.

The RAL correction process allows applicants to make corrections to many of the items on the Form 471 if the corrections are submitted no later than 20 days after the date of the RAL. Both applicants and service providers should carefully review the information on the RAL and the associated Form 471 so that any necessary RAL corrections can be submitted promptly. **The deadline for submitting corrections for this first batch of RALs is December 30.**

For a description of the RAL correction process, refer to your copy of the RAL or the [sample applicant RAL](#) on the USAC website. To view a Form 471 online, go to the [Apply Online](#) page, click on the Display button in the Form 471 column, enter your Form 471 number and security code and choose the Original view type, then click Display.

Entity Numbers, Part 2

In the [December 4 SL News Brief](#), we covered basic information on entity numbers. This week we will discuss specific situations where new entity numbers may be required and – if appropriate – how to apply for discounts for new entities on a Form 471 Block 4 worksheet.

In general, each separate school or library building should have an entity number. However, you should refer to the guidance below to determine whether to request an entity number and, if so, how to feature it on a Form 471 Block 4 worksheet. We suggest that you read through all of the guidance below before you decide which situation most closely resembles your own. Remember also that you must maintain documentation related to your calculation of student eligibility for the National School Lunch Program (NSLP) or an [alternative discount mechanism](#).

Buildings located on the same campus

If several school or library buildings are located on the same campus – i.e., no public right-of-way crosses between the buildings – and all of the buildings are considered part of that school or library, you do not need a separate entity number for each.

- However, if one of the buildings serves multiple entities – for example, a separate cafeteria facility on a high school campus that functions as a central kitchen for all of the schools in the school district – that entity needs its own entity number regardless of whether or not the buildings are separated by a right-of-way.
- If several schools are located in the same building – for example, if a middle school and a high school share a building and they are considered separate schools by their state – each school should have its own entity number.

School or library buildings under construction

A school or library building that is under construction can receive discounted services for FY2010.

- If the building is located on an existing campus, follow the guidance above.
- If the state considers a school or library building under construction to be an existing entity (for example, a new building to house a library that now occupies a different building), the entity number from the original building carries over to the new building. You should update the contact information for the school or library by following the guidance on [Entity Numbers](#).
- If the state considers the building to be a new school or library, you should request a new entity number for that school or library building.

Here are some Form 471 filing tips for new schools or libraries:

- If the student population of a new school is known, you can use the counts from that student population to calculate the discount for the new school.
- If the student population of a new school is not known;
 - School associated with a school district - you can use the weighted average discount for the associated school district as the discount for the new school. To calculate the discount, create a Block 4 worksheet online listing all the schools in the school district, then display the worksheet. The system will calculate the weighted average discount for the school district. For each worksheet that features the new school, enter zeroes for the student count numbers, check the "Non-matrix Discount" box, and enter the weighted average discount for the district.
 - School not associated with a school district - including non-public schools and charters - you can use 20 percent discount.
- The discount for a new library is the average discount for the school district in which the library is located. Divide the total number of students in the school district in which the library building is located by the number of students in the district eligible for NSLP. Using that percentage result and the [urban or rural status](#) of the library building location,

find the discount in the [Discount Matrix](#). For each worksheet that features the library building, choose that discount from the drop-down menu.

Non-instructional facilities

A non-instructional facility (NIF) is a school building without classrooms or a library building without public areas. NIFs are eligible for Priority 1 services (Telecommunications Services and Internet Access) but are only eligible for Priority 2 services (Internal Connections and Basic Maintenance of Internal Connections) if they are necessary for the transport of discounted services to classrooms of a school or to public areas of a library. Note that an administrative office or wing located in a school or library is not considered a NIF but rather part of that school or library building. Administrative offices that serve multiple schools may or may not be located on the campus of an individual school. In this case, they are considered a NIF because they serve more than just the school on whose campus they are located. Finally, note that NIFs can be on property owned by a school district or library, or they may simply be rented space in a building such as a town hall or a commercial building.

- Examples of school district NIFs include, but are not limited to, administrative buildings, school bus barns and garages, cafeteria offices, and facilities associated with athletic activities. In general, school district NIFs are eligible for the weighted average discount of their associated school district.
- Examples of NIFs on library property include, but are not limited to, administrative buildings, bookmobile garages, interlibrary loan facilities, and library technology centers. Library NIFs are eligible for the average discount for the school district in which they are located.

Here are some Form 471 filing tips for NIFs:

- To calculate the discount for a school district NIF, create a Block 4 worksheet online listing all the schools in the school district, then display the worksheet. The system will calculate the weighted average discount for the school district. For each worksheet that features the NIF (which you can also add to the existing worksheet), enter zeroes for the student count numbers, check the "Non-matrix Discount" box, and enter the weighted average discount.
- To calculate the discount for a library NIF, divide the total number of students in the school district in which the NIF is located by the number of students in the district eligible for NSLP. Using that percentage result and the [urban or rural status](#) of the county in which the NIF is located, find the discount in the [Discount Matrix](#). For each worksheet that features the NIF, choose that discount from the drop-down menu.

In some cases, a facility can be considered a NIF even though it has one or more classrooms. For example, a school district administrative building may have a classroom that is used by a specific group of students or a population of students that changes from day to day. If a school district NIF has one or more classrooms, the applicant should use the student population of the classroom(s) rather than the weighted average discount of the school district for the NIF's discount.

- If the student population is the same from day to day, the applicant uses the student count and NSLP count from that student population in the Block 4 worksheet.
- If the student population changes from day to day, the applicant uses the snapshot method to calculate the discount by choosing a particular day and entering the student count and NSLP count for that day in the Block 4 worksheet.

Single entities with multiple locations

In some cases, an entity is considered a single school by the state but it operates from more than one location. For example, a charter school may have a main location and three branch locations separated by at least one public right-of-way, but be considered a single school by the state. Although the main location and each branch location must have a separate entity number, completion of the Form 471 Block 4 worksheet will be different under different circumstances.

It is likely that the main location or office will be the Billed Entity — that is, the entity that is listed in Block 1 of the Form 471 and subsequent program forms and that pays the bills to the service provider(s). Below are three scenarios and the Block 4 guidance for each scenario:

Scenario 1. Single entity with multiple locations.

- List the main location on the Block 4 worksheet with the entire student count for all locations. Then list each location on the worksheet, enter zeroes for the student counts, check the box for "Non-Matrix Discount," and enter the discount for the main location.

Scenario 2. Single entity, multiple locations and main location does NOT have classrooms.

- Choose one of the locations - the one least likely to later be removed from the worksheet - and list that location on the Block 4 worksheet with the entire student count for all locations. Then list the other locations on the worksheet, enter zeroes for the student counts, check the box for "Non-Matrix Discount," and enter the discount for the main location. Lastly, list the main location on the Block 4 worksheet as a NIF. Use the NIF discount calculation instructions.

Scenario 3. Single entity, multiple locations and main location is partially eligible (for example, a non-profit agency that runs both Head Start facilities and also conducts other charitable activities) as a NIF.

- Choose one of the locations - the one least likely to later be removed from the worksheet- an list that location on the Block 4 worksheet with the entire student count for all locations. Then list the other locations on the worksheet, enter zeroes for the student counts, check the box for "Non-Matrix Discount," and enter the discount for the first location. Lastly, list the main location on the Block 4 worksheet as a NIF. Use the NIF discount calculation instructions.
- In the Item 21 attachment, provide a cost allocation that clearly provides the details to support the calculation of the eligible portion of the costs going to the main location. Remember, cost allocations must be based on tangible criteria and reach a realistic result.

For detailed information on calculating discounts, refer to the specific instructions for completing Block 4 worksheets on pages 13–22 of the [Form 471 Instructions](#).

You may download and print copies of [Schools and Libraries News Briefs](#) on USAC's website. You may [subscribe](#) to or [unsubscribe](#) from this news brief. For program information, please visit the [Schools and Libraries area](#) of the USAC website, [submit a question](#), or call us toll-free at 1-888-203-8100. Feel free to forward this news brief to any interested parties.

Please do not reply to this email directly, as it was sent from an unattended mailbox.

1997-2009, Universal Service Administrative Company, All Rights Reserved.

[Back](#)