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Schools and Libraries News Brief

October 21, 2011

TIP OF THE WEEK: The deadline for applicants and service providers to complete invoicing for most FY2010 recurring services is next Friday, October 28. Applicants should keep in mind that BEAR Forms filed online or on paper must be approved by service providers on or before October 28 to meet this invoicing deadline.

Commitments for Funding Years 2011 and 2010

Funding Year 2011. USAC will release FY2011 Wave 19 Funding Commitment Decision Letters (FCDLs) October 26. This wave includes commitments for approved Priority 2 (Internal Connections and Basic Maintenance) requests at 90%. As of October 21, FY2011 commitments total over \$1.14 billion.

Funding Year 2010. USAC will release FY2010 Wave 72 FCDLs October 26. This wave can include commitments for approved Priority 2 requests at all discount levels. As of October 21, FY2010 commitments total over \$2.84 billion.

On the day the FCDLs are mailed, you can check to see if you have a commitment by using USAC's <u>Automated Search of Commitments</u> tool.

More on Entity Numbers

In <u>last week's SL News Brief</u>, we covered basic information on entity numbers. This week we will discuss specific situations where new entity numbers may be required and how to calculate discounts for those entities.

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 calculate the discount for that entity. Remember that you must maintain documentation related to (1) your calculation of student eligibility for the National School Lunch Program (NSLP) and/or (2) your use of an <u>alternative discount mechanism</u>.

Buildings located on the same campus

If several school or library buildings are located on the same campus – i.e., no public right-ofway 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 building.

- 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.

- 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 the USAC website on Entity Numbers.

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• If the state considers the building to be a new school or library, you should call the Client Service Bureau at 1-888-203-8100 or <u>Submit a Question</u> to request a new entity number for that school or library building.

Here are some tips on calculating discounts for new schools or libraries:

- If the student population of a new school is known, you can use the student counts (the total number of students in the school and the total number of students in the school that are eligible for NSLP) from that student population to calculate the discount for the new school.
- If the student population of a new school is not known and the school is associated with a school district, you can use the weighted average discount for the associated school district as the discount for the new school.
- If the student population of a new school is not known and the school is not associated with a school district – this can include non-public schools and charters – you can use a 20 percent discount. (You can update your student counts during the application review process if those numbers are available by that time.)
- The discount for a new library is the average discount for the school district in which the library is located.

Non-instructional facilities

A non-instructional facility (NIF) is a school building without classrooms or a library building without public areas. (Some school NIFs contain one or more classrooms – see below for more information.) 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) 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 be located on the campus of an individual school. However, they are considered NIFs and should have their own entity numbers because they serve more than just the school on whose campus they are located. Note also 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 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 library NIFs 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.

In some cases, a school 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 to calculate 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 to calculate the NIF's discount.
- If the student population changes from day to day, the applicant uses the snapshot method to calculate the NIF's discount. To use the snapshot method, choose a particular day and use the student counts for that day to calculate the discount.

Remember to retain the documentation that supports your discount calculation.

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<u>Libraries area</u> of the USAC website, <u>submit a question</u>, or call us toll-free at 1-888-203-8100. Feel free to forward this news brief to any interested parties.

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