

Schools and Libraries

NEWS BRIEF

October 11, 2013

TIP OF THE WEEK: If you have a commitment from USAC for FY2013 and your services have started, you should be preparing to file an FY2013 FCC Form 486. October 29 is the deadline for filing this form if your service start date is July 1, 2013 and your FCDL is dated on or before July 1.

Commitments for Funding Years 2013 and 2012

Funding Year 2013. USAC will release Funding Year (FY) 2013 Wave 22 Funding Commitment Decision Letters (FCDLs) October 16. This wave includes commitments for approved Priority 1 (Telecommunications Services and Internet Access) requests at all discount levels. As of October 11, FY2013 commitments total just under \$1.01 billion and encompass 25,682 of FY2013 applications.

Funding Year 2012. USAC will release FY2012 Wave 63 FCDLs October 17. This wave includes commitments for approved Priority 2 (Internal Connections and Basic Maintenance) requests at 90 percent and denials at 89 percent and below. As of October 11, FY2012 commitments total over \$2.77 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.

More on Entity Numbers

In [last week's 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 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 [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 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 the buildings are separated by a public 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](#).
- 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 [Submit a Question](#) 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 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 charter schools – you can use a 20 percent discount. You can then update your student counts during the application review process if the student counts are available by that time.
- The discount for a new library is the average discount (**not** the weighted average discount) for the public school district in which the library is located. To calculate this average discount, divide the total number of students in the school district eligible for NSLP by the total number of students in the school district, and then use that percentage to find the discount in the [discount matrix](#).

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, Telecommunications, 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 (see above). 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 use 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 use the average discount for the public school district in which they are located (see above).

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 by 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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