

NYSED E-Rate Entity Eligibility for Multi-Location Schools

Introduction

Individual non-public schools in New York operating out of multiple sites have historically experienced difficulties validating the eligibility of each of their facilities for E-rate purposes. More recently, similar validation issues have arisen with respect to public school district and public library annexes, and to satellite BOCES operating facilities. The underlying problem stems from the difference between the way NYSED and USAC track schools, libraries, and facilities. With regard to schools in particular:

- Individual schools in New York are assigned unique LEA (or BEDS) Codes and are listed separately in the NYSED's SEDREF database. If a single school operates out of multiple locations, only its main address is indicated.
- E-rate procedures require USAC to track E-rate services to individual locations, each identified with a unique entity number. USAC must validate the eligibility of each entity as either a "school" or a Non-Instructional Facility ("NIF").

Although USAC has begun issuing guidelines for dealing with multi-location schools, it is still relying on the E-rate coordinators in the individual states to validate the eligibility of instructional or library sites not specifically identified as "schools" or "libraries" in state databases. The following procedures have been developed by NYSED, and reviewed with USAC, as a means of validating multi-location schools and libraries within New York State.

Implementation of a NYSED Multi-Location School Database

Rather than change its existing SEDREF database to accommodate multiple-site schools (or libraries), solely for E-rate purposes, NYSED has developed a separate Multi-Location School Database which may be utilized by USAC to validate the eligibility of individual school and library sites. This database is hosted on the NYSED E-Rate Resource Center Web site maintained by E-Rate Central (<http://www.e-ratecentral.com/us/nys/nysed/index.asp>).

The responsibility for submitting and updating site data for NYSED's Multi-Location School Database rests with the applicants themselves. New York applicants wishing to have their sites listed in the database must submit a formal certifying letter to NYSED as per the attached format. The letter should list the addresses of all its physical sites, indicating whether each site is instructional (i.e., with classrooms or public library access) or is purely administrative (i.e., a "NIF").¹ Upon review, the site listings will be added or updated in the NYSED Multi-Location School Database.

¹ Summer school camps operated by some parochial schools may be included in this listing if, and only if, they are providing primary or secondary education and are recognized as schools in the NYSED Child Nutrition System (i.e., feeding sites eligible for four meals per day).

Schools or libraries seeking listing in the NYSED Multi-Location School Database are encouraged to submit their certification letters as early as possible in the E-rate funding cycle, preferably before their E-rate applications have been reviewed by USAC's Program Integrity Assurance ("PIA").² Schools that have not been assigned E-rate entity numbers for all their sites should do so beforehand by calling USAC's Client Service Bureau (888-203-8100).

Important E-Rate Implications

The following implications should be noted when a multi-location school or library files its E-rate application:

1. Recent USAC guidance indicates that an individual, non-public, multi-location school should file a "school" application, not a "district" application.
2. The discount rate for a multi-location school or library will be calculated as if it was a single school or library (i.e., the applicant should use a matrix discount based on the school's total enrollment and the total number of eligible students). This should be easy for a multi-location school which is treated as a single feeding site in the NYSED Child Nutrition System. For Block 4 purposes, the main school or library location (associated with the Billed Entity Number) should be listed first, together with the total student numbers. All other sites should be listed with zero students, the entire school's or library's discount rate, and an indication that the zero-student discount rate is based on an Alternative Discount Mechanism.
3. Note that a "school" or "library" applying for Internal Connections funding will be subject to the Two-in-Five Rule as a single entity. Internal Connections at one site, therefore, will count as a year's worth of eligibility for the entire school or library.

Additional Information

New York applicants seeking additional information on the NYSED Multi-Location School Database, including certification requirements and E-rate implications, should e-mail:

Winston E. Himsworth
E-Rate Central
whimsworth@e-ratecentral.com

² If PIA finds a school or library with unlisted sites, we recommend that the school ask PIA to defer action for a reasonable period until the school or library can provide NYSED with updated site information and the online database can be updated accordingly.

Draft Certification Letter
 To be placed on school letterhead
 It may be faxed to NYSED at (518) 473-4884

<Date>

Mr. Michael Tracy-Ireland
 New York State Education Department
 89 Washington Avenue, Room 317
 Albany, New York 12234

Ref: NYS BEDS Code: <enter>
 School name:* <enter>
 Main address: <enter>

E-Rate School Name:*
 E-Rate Billed Entity Number (BEN): <enter>

Please be advised that our school, which is listed by NYSED as a single school under the above referenced BEDS Code, has two or more physically separate sites. For E-rate filing purposes, each of these sites is considered a separate entity. Please include our school and our multiple facilities (as listed below) in the NYSED Multi-Location School database.

Entity No.	Facility Name*	Facility Address	Type**

Please add additional table rows, if required.

* Please use school and facility names as they appear in the NYSED and E-rate entity databases.

** Facility Type Codes: IF = Instruction Facility (with classrooms)
 NIF = Non-Instructional Facility (no classrooms)
 SSS = Separate Summer School (or "camp")

Certifications (please include only those applicable):

- I certify that all Instructional Facilities ("IF") are operated by our school and are used to provide elementary and/or secondary educational services to our school's students. Any other use of these facilities has been and/or will be allocated out of any E-rate funding requests.

2. I certify that all Non-Instructional Facilities (“NIF”) are used only by school employees for school business. Any other use of these facilities has been and/or will be allocated out of any E-rate funding requests.

3. I certify that the Separate Summer School (“SSS”) is operated by our school, is used to provide elementary and/or secondary educational services to our school’s students, and is recognized as a school in the NYSED Child Nutrition System. Any other use of this facility has been and/or will be allocated out of any E-rate funding requests.

Signed: _____
Printed Name: _____
Title: _____
Telephone: _____
E-mail: _____
Date: _____

Copy to: E-Rate Central
400 Post Avenue, Suite 410
Westbury, NY 11590-2291
Fax: (516) 801-7811