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Urban Libraries Council

Presentation to Commissioner O'Rielly

June 20, 2014

ULC Background

- Non-profit, headquartered in Washington D.C., providing policy and other services to public library members
  - Includes urban, suburban and rural public libraries
  - Author of May 21 letter signed by 100+ public libraries, that serve more than 80 million people, recommending a number of E-rate reforms specific to public libraries
- Founded in 1971 to serve learning needs of *all* residents of *all* ages
- CEO Susan Benton has focused on re-imagining E-rate for public libraries

Other Stakeholders

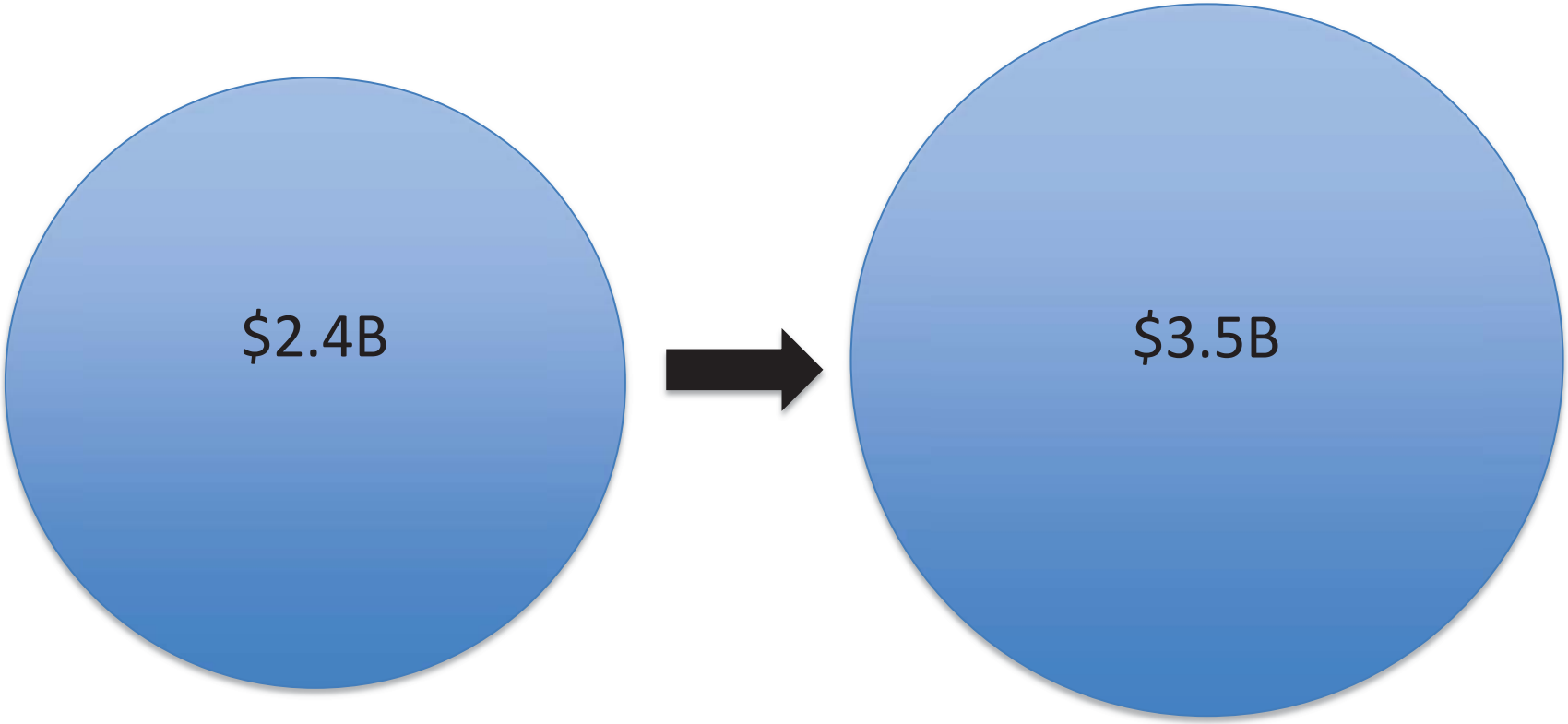
- ULC has been meeting with a number of other E-rate stakeholders:
  - American Library Association – represents librarians and libraries, including 100,000 school-located libraries
  - Chief Officers of State Library Agencies (COSLA)
  - Institute of Museum and Library Services
  - SHLB Coalition - represents a cross section of schools, libraries, health care providers and other anchor institutions
  - Digital Public Library of America
  - Education SuperHighway
  - Aspen Institute
  - Congress & FCC

Statement of Need

- The E-rate program has not supported public library buildings and users as effectively as school buildings and users
  - Public library share of E-rate funding is ~ 3% of E-rate funds while buildings represents 15% of total (current funding ~ $70M)
  - Public libraries would have gained an additional $4.5B over last 17 years if 15% of funding received
  - Public libraries are the primary free public Internet access point
  - Public libraries serve six times the population served by K-12 (and serve K-12 students)
  - Receive less financial support from federal government than any other civic/learning institution

Statement of Need (cont'd)

- To correctly size the E-rate, the FCC must calculate the need for both schools and libraries

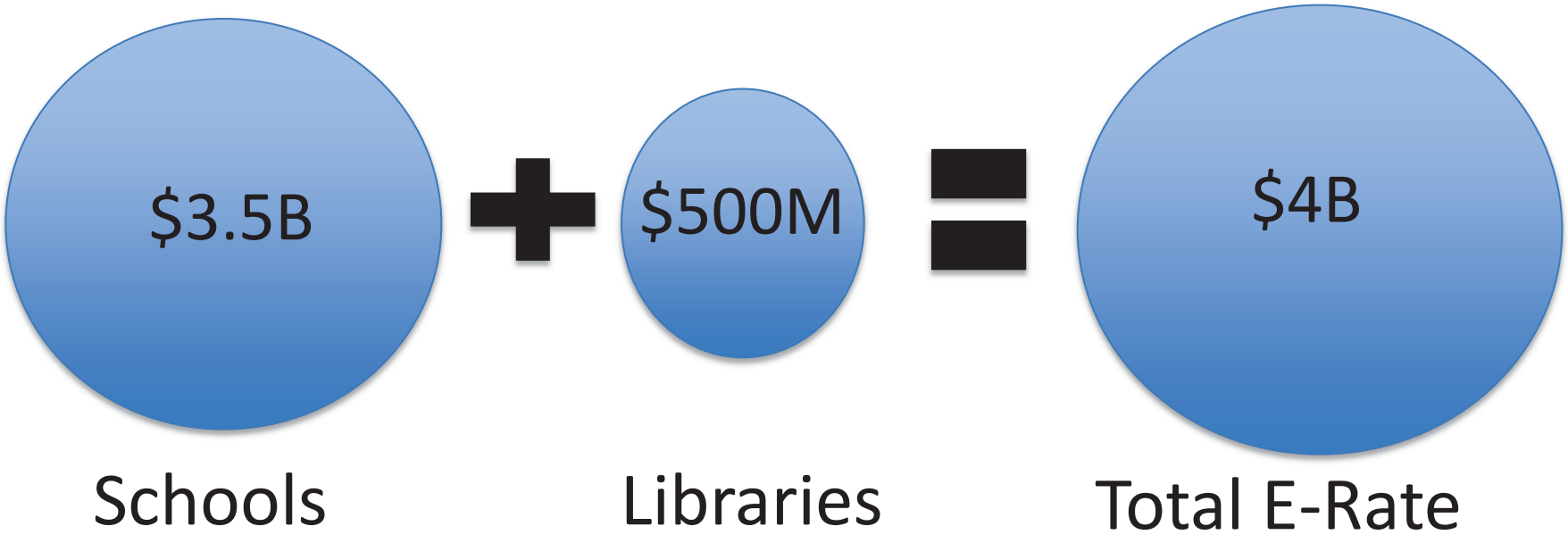


E-Rate Today

E-Rate + Inflation Since 1997

Statement of Need (cont'd)

- This need includes the number of public library buildings and users



ULC Findings

- ULC has found that very few public libraries have 1 Gbps to-the-building connectivity and none have the minimally adequate 5 Mbps down/1 Mbps up per user speeds at critical times
  - These findings were confirmed by a recent California State Library study
- Public libraries do not have the same governance as schools
  - Public libraries do not obtain much E-rate funding from school-led consortiums, and their governing authorities do not always supply broadband to and inside public libraries as part of the same processes that apply to schools

E-Rate Mandates

- Congress has commanded the FCC to provide “advanced telecommunications and information services” to users of libraries (as well as schools)
  - “Advanced” is a term that has evolved over time
  - It now means at least 1 Gbps to every library building in America and also at least 5 Mbps download Wi-Fi in all usable spaces inside libraries
- Based on ULC’s survey none, or almost none, of American libraries now has what Congress has commanded the FCC to provide by means of the E-Rate
- Therefore, this FCC must rectify the situation

E-Rate Funding Priorities

- The FCC plainly should maximize the effectiveness of any FCC spending on the E-Rate
- Therefore, it should prioritize spending based on the number of users who benefit from any marginal dollar of spending
- An appropriate formula for prioritizing funding is to add the following: number of users, low-income users as a measurement of need, and cost of delivering advanced services
- For example, a top funding priority would be a large urban library with thousands of users a day, where incomes are low relative to cost of living, and where the E-Rate money would achieve the requisite wireline and wireless bandwidth

E-Rate Funding Is Distinct from USF

- The E-Rate is separate and independent from the federal Universal Service Fund (USF)
- The FCC would act contrary to law if it were to condition its fulfillment of its E-Rate mandate on any alteration in USF funding
- The FCC may not lawfully decline to follow Congressional instructions in one topic area unless and until a majority of the Commission alters its rules in some other area
- The Commission may not refuse to increase the total funding of the E-Rate if an increase is necessary to fulfill the mandate; only Congress can alter the mandate to provide the requisite services to library and school users

ULC Recommendations

- E-Rate should be increased to reflect inflation accrued during the last 17 years

- The neediest applicants should receive funding priority:

  - (1) income of the user group (weighted by cost of living), plus
  - (2) number of daily users of the building (assesses the necessary Wi-Fi and desktop connectivity)

ULC Administrative Reforms

- Administration of the E-rate should accommodate the unique challenges faced by public libraries:
  - Public libraries should have access to the contracting prices obtained by other libraries and by schools in similar geographic areas
  - Public libraries should be permitted to opt into contracts that the FCC itself puts out for bids.
  - Public libraries should be able to obtain E-rate funding for "whole networks"

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May 21, 2014

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Rosenworcel, and Commissioner Pai:

This letter is sent on behalf of public libraries that are members of the Urban Libraries Council, serving over ninety million individuals across the country, to provide the Commission with a series of E-rate program reform recommendations specific to public libraries.

The E-rate legislation and implementing regulations established public libraries as a separate and distinct set of civic institutions to which the FCC has the authority and duty to provide advanced telecommunications services. While there is nothing in the statute or regulations that suggests that public libraries are inferior to schools, and no one commenting in the pending E-rate proceeding has supported this idea, public libraries and the citizens they serve are not being equally considered. The facts are that the E-rate program as administered has not addressed public library buildings and users as effectively as school buildings and their users in at least three major respects. While a number of participants in this proceeding have eloquently made the case for reform of the E-rate program for schools, the case for public libraries is just as strong—but also quite different.

The three major E-rate problems for public libraries are:

1. **Proportionality.** Public libraries have not received a proportion of E-rate funding that parallels the proportion of public library buildings compared to school buildings. Public libraries operate in approximately 17,000 buildings, whereas schools receiving E-rate funding appear to operate in about 100,000 buildings. Roughly speaking, after school buildings receive all of the funding necessary to meet their goals, then public libraries should have received one-sixth of allocated funds for the 17-year history of the E-rate. If, for example, the E-rate had been indexed for inflation, as it should have been from inception, then schools would be drawing about $3.4 billion a year, and libraries would be receiving about $560 million, for a total of about $3.96 billion a year. Instead, public libraries have been receiving only about $60-70 million a year. The cumulative shortfall since the beginning of the E-rate now totals about $4 billion. It is predictable and regrettable that the results of this shortfall are visible in every public library in the country: (1) very few have 1 Gbps bandwidth to the building; (2) perhaps none have the minimally adequate 5 Mbps downlink Wi-Fi per user at critical times; (3) few have adequate desktop computers for their user base; and, (4) only a very few can afford the high cost of digital information.

The 1996 Telecommunications Act was signed in the Library of Congress in order to showcase its promise of connecting everyone to all information through the E-rate. Given this original goal, it is tragic that the E-rate has left public libraries offering Internet access inferior to what is available in most single family households today. Yet public libraries are the most important and often only free, public Internet access point for after-school children or the 90 million adult Americans who are not in the workforce and, therefore, cannot access the Internet at work. Urban, suburban and rural public libraries are also critically important Internet access points for the one-third to 40% of Americans in those geographic areas who do not have broadband access at home.

2. **Needs.** Public libraries receive less financial support from the federal government than any other institution in the civic landscape. If the E-rate had provided the requisite proportional funding to public libraries (the rule of one-sixth), then at $560 million a year, the E-rate would be more than three times the budget of the Institute of Museum and Library Services, the largest and most important federal agency with a library mission, other than the FCC. At that level of funding, the FCC could transform public libraries into fertile grounds for innovating and digital learning, as well as providing adequate access to the Internet for the more than 100 million Americans who annually use libraries for such access. (That is much larger than the number of students and teachers in all K-12 schools.) However, because any E-rate spending must be allocated equitably -- that is, serving buildings in descending order of need, with the most needy coming first -- part of E-rate reform should be the creation of a formula for prioritizing library funding. The undersigned believe in a two-part formula: (1) income of the user group (weighted by cost of living), plus (2) number of daily users of the building (because the number leads to assessing the necessary Wi-Fi and desktop connectivity).

Because a large urban or suburban library will have at least as many users per day as there are students in a large high school (many will have three to four times as many users), the cost-of-living-adjusted income levels in cities will push urban libraries to the top of any equitable assessment of need. At the other end of the demographic analysis, rural libraries have fewer users, but often very low-income levels in their user base. Eventually all public libraries should receive E-rate funding necessary to produce the 1 Gbps outside/5 Mbps inside bandwidth. In order to maximize results per E-rate dollar, however, an equitable formula is necessary.

<u>In no way should such prioritizations pit urban against rural or library against school. Instead, this is an opportunity to ensure that the playing field is leveled for all simultaneously</u>.

3. **Administration.** While a number of participants in this proceeding have studied the contracting processes for schools, these studies have not addressed the situation of public libraries. This was not an error as much as a practical acknowledgment of the near irrelevance of public libraries to the administration of the E-rate program. Buildings that receive as little as three percent of the E-rate funding understandably do not attract the study of those who focus on deficiencies in the existing contracting process.

Many of the E-rate reforms proposed in this proceeding do not address the primary issues for public libraries. Public libraries do not obtain much E-rate funding from school-led consortiums, and their governing authorities do not necessarily choose to supply broadband to and inside public libraries as part of the same processes that apply to schools. Giving due deference to the actual

governance of public libraries (as the FCC must), the E-rate program as to libraries will need to be administered under at least three different rubrics. First, all libraries should have access to the contracting prices obtained by other libraries and by schools in similar geographic areas. Next, all public libraries should be able to opt into contracts that the FCC itself puts out for bids. Finally, all public libraries should be able to know that they can contract for "whole networks." This means access to the Internet at a wide area network point of presence, a 1 Gbps fiber connection to every library building (two thirds of libraries have no fiber and those that do cannot afford the electronics upgrade to Gbps bandwidth), a 5 Mbps Wi-Fi downlink inside all buildings, as well as caching, firewall, and maintenance. Comprehensive funding for whole networks is especially critical because a network is only ever as fast as its slowest link.

These three rubrics should be transparent and predictable for at least five-year contracting periods.

The FCC's current process of modernizing the E-rate has served as a stimulus to the community of public libraries' thinking about the digital future of all communities. No other institutions rival the significance of public libraries in the civic landscape for adults, and for children during the many days and hours when school is not in session. Public libraries across the country now are asking themselves how it has come to pass that they have suffered such a shocking shortfall in obtaining E-rate funds.

Thanks to the FCC and its supporters in Congress, especially the chairman of the Senate Commerce Committee and the originator of the E-rate legislation along with now-retired Senator Snowe, public libraries are recognizing what should have happened and what needs to happen in order to provide a digital future for all Americans everywhere.

Thank you for your consideration.

Respectfully yours,

- Alameda County Library CA
- Albuquerque/Bernalillo County Library System NM
- Alexandria (VA) Library
- Allen County Public Library IN
- Anchorage Public Library System AK
- Anne Arundel County Public Library MD
- Anythink CO
- Arapahoe Library District CO
- Atlanta-Fulton Public Library System GA
- Boston Public Library MA
- Bridgeport Public Library CT
- Brooklyn Public Library NY
- Broward County Libraries Division FL
- Carnegie Library of Pittsburgh PA
- Charlotte Mecklenburg Library NC
- Miami-Dade Public Library System FL
- Mid-Continent Public Library Serving Greater Kansas City, MO
- Milwaukee Public Library WI
- Multnomah County Library WA
- Nashville Public Library TN
- New Haven Free Public Library CT
- New Orleans Public Library LA
- Newport News Public Library System VA
- Oakland Public Library CA
- Omaha Public Library NE
- Orange County Library System FL
- Palm Beach County Library System FL
- Palo Alto City Library CA
- Pierce County Library System WA
- Pikes Peak Library District CO

- Chattanooga Public Library TN
- Columbus Metropolitan Library OH
- County of Los Angeles Public Library CA
- Dayton Metro Library OH
- DeKalb County Public Library GA
- Denver Public Library CO
- Des Moines Public Library IA
- Detroit Public Library MI
- District of Columbia Public Library
- East Baton Rouge Parish Library LA
- El Paso Public Library TX
- Enoch Pratt Free Library MD
- Fort Vancouver Regional Library District WA
- Fort Worth Public Library TX
- Free Library of Philadelphia PA
- Fresno County Public Library CA
- Frisco Public Library TX
- Grand Rapids Public Library MI
- Gwinnett County Public Library GA
- Hartford Public Library CT
- Hayward Public Library CA
- Houston Public Library TX
- Indianapolis Public Library IN
- Jacksonville Public Library FL
- Jefferson County Public Library CO
- Johnson County Library KS
- Kalamazoo Public Library MI
- King County Library System WA
- Las Vegas-Clark County Library District NV
- Lexington Public Library KY
- Lincoln City Libraries NE
- Live Oak Public Libraries GA
- Los Angeles Public Library CA
- Loudoun County Public Library VA
- Madison Public Library WI
- Marin County Free Library CA
- Memphis Public Library and Information Center TN
- Pima County Public Library AZ
- Pioneer Library System OK
- Portland Public Library ME
- Poudre River Public Library District CO
- Prince George's County Memorial Library System MD
- Providence Public Library RI
- Public Libraries of the City of Pasadena CA
- Queens Library NY
- Richland Library SC
- Richmond Public Library VA
- Rochester Public Library NY
- Sacramento Public Library CA
- Saint Paul Public Library MN
- Salt Lake City Public Library UT
- Salt Lake County Library Services UT
- San Antonio Public Library TX
- San Diego County Library CA
- San Diego Public Library CA
- San Francisco Public Library CA
- San José Public Library CA
- Santa Clara County Library District CA
- Sno-Isle Libraries WA
- Somerville Public Library MA
- Springfield City Library MA
- St. Louis County Library MO
- St. Louis Public Library MO
- The Kansas City Public Library MO
- The New York Public Library NY
- The Public Library of Youngstown & Mahoning County OH
- The Seattle Public Library WA
- Toledo-Lucas County Public Library OH
- Topeka and Shawnee County Public Library KS
- Tulare County Library CA
- Virginia Beach Public Libraries VA
- Wichita Public Library KS
- Worcester Public Library MA
- Ohio Public Library Information Network (OPLIN)

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June 9, 2014

Dear Chairman Wheeler and Commissioners,

The members of the Urban Libraries Council (ULC) appreciate the deliberative process underway at the Commission to modernize the nation's E-rate program. We recognize the many voices and opinions which must be considered and are pleased to participate in representing the views of our over 130 public library members across the country. To that end, we want to make two critical observations that have relevance to the restructuring of E-rate.

1) **Public Libraries = Education**
When the E-rate was created in 1997 for libraries and schools, its focus was on providing access to the universe of knowledge and information that was just beginning to be made available by broadband technologies.

The Great Recession provided a harsh reminder that education must be a lifelong pursuit in the 21st century Knowledge Economy. We now recognize that we must be 'students for life,' continuously leveling-up our knowledge and skills to meet the ever-changing needs of today's workplace.

Throughout the recession, the public library became the *one* place that millions of Americans could learn how – without having to pay out-of-pocket – to use a computer, to complete on-line job applications, to conduct job searches and to acquire computer skills that could lead to employment.

As this country's most trusted and accessed civic organization, public libraries meet users at whatever age and life stage (from toddler to student to worker) they enter the library and advance the individual's learning and development. To be sure, libraries are not responsible for presenting the K-12 school curriculum. Yet, public libraries have always been – and are ever more critical as – a key institution within our education infrastructure.

By preparing toddlers to enter school, supporting traditional K-12 school curriculums through organized homework help centers, advancing programs that address summer learning loss, and providing resources and programs to catalyze adult skills development (particularly adults who have been unsuccessful in the traditional school setting), public libraries are key to our country's education infrastructure and must be seen as equal in importance to schools for receiving their share of E-rate.

2) **Connectivity for All Public Libraries – No Matter the Location**
The Urban Libraries Council believes that all public libraries – no matter their location – require immediate and comprehensive support in acquiring broadband connectivity. The Commission should not be led into a false argument of urban libraries over suburban or rural. In reality, ULC member library systems, like many others across the United States,

have library branches in all three settings. (Please see attached Document A.) Funds provided to these systems are used in all three settings.

ULC stands firmly with Chairman Wheeler and endorses his statement on January 16, 2014 that all public libraries should receive one gigabyte by 2016. All means all – no matter the location.

We recognize, however, that we do not live in a country of limitless funds and that upgrading connectivity in the nation's libraries must be done in a manner that correlates to *need* not location. That is why ULC is suggesting a two-part needs formula calculating: 1) income of the user group (weighted by cost of living), and 2) number of daily users of the building (the user number provides the basis for assessing the required Wi-Fi and desktop connectivity).

Thank you for the consideration you are giving the E-rate modernization. ULC understands the complexity of the effort. Similar to this submission, past ULC filings have provided data gathered from member libraries. We are willing to provide any additional data that can be of use to the Commission as it continues its work in the weeks and months ahead.

Thank you for all of your work to ensure that public libraries have the best resources possible to ensure the brightest possible future for our country.

Sincerely,

Susan Benton
President and CEO

Library Systems Consist of Urban, Suburban and Rural Libraries

Pima County Public Library, AZ

- Serving 9,189 square miles
- 27 libraries in system
  - 12 – urban locations, 11 – suburban locations; 4 - rural locations
- Pima County Public Library serves a population of 992,394 residents. The overall poverty rate served by our system is 19%. Sixteen of our branches are located in working poor/high poverty neighborhoods/communities. Additional information that may be of use: http://www.city-data.com/county/Pima_County-AZ.html

- The vast majority of the Pima County population lies in and around the city of Tucson (2011 city population: 525,796), filling much of the eastern part of the county with urban development. Tucson, Arizona's second largest city, is a major commercial and academic center. Other urban areas include the Tucson suburbs of Oro Valley (population 41,335), Marana (population 35,232), Sahuarita (population 25,458), and South Tucson (population 5,695), a large ring of unincorporated urban development, and the growing satellite towns of Green Valley and Vail. The rest of the county is sparsely populated; the largest towns are Sells, the capital of the Tohono O'odham Nation, and Ajo in the far western region of the county.

Fresno County Public Library, CA

- Square miles served by system: 6,000
- Number of branches: 34
- Number of branches that in urban, suburban and rural settings (please generalize): Urban: 4; Suburban: 12; Rural: 18.

- Brief description of socioeconomic population served: Fresno County is the Fruit Basket of the nation and is primarily served by two large cities, Fresno and Clovis; and several smaller cities/towns that are fully surrounded by agricultural lands. It is one of the very poorest areas in the nation with unemployment typically in the 18-25% range, depending on where in the county you are. High school drop-out rates are in the 25% range, ESL and immigration issues are critical, and the prisons are full. With the current drought, orchards are being destroyed because there is no water; thousands heads of cattle have been slaughtered because there is not enough water to feed the animals. Unemployment, low wages, health care, immigration, poor education…you name it, Fresno County faces it.

Pikes Peak Library District, CO

- Service Area: 2000 square miles
- Libraries: 14 libraries and 3 mobile vehicles
  - 8 facilities are in the urban area
  - 4 are in suburban areas
  - 2 are in rural areas, and the bookmobiles serve several small communities in our rural/plains area as well as facilities within the City

- Population Served: PPLD serves a total population of nearly 600,000, including the Colorado Springs urban area (downtown, I-25 corridor, and Academy Blvd central core), four El Paso County suburban areas that all have their own Mayors, and rural areas in both the mountains and the plains (Katherine Lee Bates actually wrote her poem that became "America the Beautiful" while sitting on Pikes Peak looking out at the plains).

- The overall free/reduced lunch rate for our service area (El Paso County, CO) is 37.9%. Three of the smallest communities on the plains have a rate of 61%, 67%, and 69%, and our two largest school systems that serve our most urban areas, are at 71% and 57%.

Palm Beach County Library System, FL

- Serving 1,828 square miles
- 17 libraries in system, 1 bookmobile
  - 5 – urban locations (Palm Beach Gardens, Greenacres, Lantana Rd., Okeechobee Blvd., Main,)
  - 8 – suburban locations (Glades Rd., Hagen Ranch Rd., Royal Palm Beach, West Boca, West Boynton Beach, Jupiter, Tequesta, Wellington)
  - 4 – rural locations (Acreage, Belle Glade, Pahokee, South Bay)

- Palm Beach County Library System serves a population of 855,000 residents. The overall poverty rate served by our system is 14.4%. Nine (Greenacres, Jupiter, Lantana, Okeechobee, Main, West Boynton, Belle Glade, South Bay, Pahokee) of our branches serve working poor/high-poverty neighborhoods/communities.

Johnson County Library, KS

- Johnson County is 480 square miles
- Population 446,000
- We have 13 libraries in the system. 4 rural and 9 suburban
- We also have another library system in the county, Olathe and it has an additional 2 location serving a population of 120,000

- 37,000 of our residents live below the poverty level with 12,000 of these being children. Our poverty level as a percentage would be 6.5%. We are an affluent well educated county with the 55% of the population having a college degree. Our four rural locations De Soto, Gardner, Spring Hill and Edgerton plus our 2 northeast locations at Antioch and Cedar Roe is where most poverty is experienced. You can see from the below graphic how poverty is becoming an issue in Johnson County.

Free and Reduced School Lunch 2013-14			
	Participation Rate	Number enrolled	10-year rate increase
BLUE VALLEY	8%	1,870	213%
DE SOTO	15%	1,045	20%
GARDNER-EDGERTON	35%	1,893	71%
OLATHE	28%	8,186	116%
SHAWNEE MISSION	38%	10,361	166%
SPRING HILL	25%	615	101%
County-wide total	26%	23,970	127%

Albuquerque/Bernalillo County Library, NM

- Serving 1,166 square miles
- 17 libraries in system
- 5 urban locations; 9 suburban locations; 3 rural locations

- Albuquerque/Bernalillo County Library serves a population of 639,921 residents. The overall poverty rate served is 17.3%. Ten of our branches are located in working poor/high-poverty neighborhoods/communities.

Multnomah County Library, OR

- Square miles served by your system: 465 square miles (Oregon Blue Book)
- Number of branches: 19 libraries total: Central Library + 18 neighborhood libraries
- Number of branches designated as urban, suburban and rural settings: 17 urban libraries; 2 locations could be considered suburban (Fairview-Columbia & Troutdale libraries); no rural locations.

- Brief description of socioeconomic population served: Multnomah County Library serves 756,000 residents across six cities. Nearly 20% of residents speak a language other than English at home; the top languages are Spanish, Vietnamese, Chinese and Russian. Several libraries are designated as "We Speak Your Language" locations, where patrons can expect bilingual staff, collections, and programming, including bilingual storytimes and computer classes. Poverty status for individuals is 19%; 56% of students in the county are eligible to receive free/reduced lunches (determined by federal income guidelines according to family size).

Richland Library, SC

- Serving 750 square miles
- 11 libraries in system
- 4 – urban locations; 4 – suburban locations; 3 – rural locations

- Richland Library system serves a population of 399,256 residents. The overall poverty rate served by our system is 16.4%. Four of our branches are located in working poor/high-poverty neighborhoods/communities.

King County Library System, WA

- Square miles served by your system – 2,100 square miles
- Number of branches - 48
- Number of branches designated as: urban (2), suburban (32) and rural (14) settings

- Brief description of socioeconomic population served – KCLS serves a widely diverse population of 1.3 million users, including affluent suburban enclaves that have some of the highest per capita incomes in the state and lower income suburban/rural areas where the overall poverty rate is 12%. Over 170 languages are spoken throughout KCLS' service area, which is home to large and rapidly growing immigrant and refugee populations.

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Document A: Library Systems Consist of Urban, Suburban and Rural Libraries

	Pima County Public Library	Fresno County Public Library	Pikes Peak Library District	Palm Beach County Library	Johnson County Library	Albuquerque/ Bernalillo County Library	Multnomah County Library	Richland Library	King County Library System	9 Library Systems	
State	AZ	CA	CO	FL	KS	NM	OR	SC	WA	**TOTAL**	**%**
Square Miles Served	9,189	6,000	2,000	1,828	480	1,166	465	750	2,100	23,978	
System Libraries	27	34	14	17	13	17	19	11	48	200	
Mobile Vehicle Libraries	0	0	3	1	0	0	0	0	0	4	NA
Urban Locations	12	4	8	5	0	5	17	4	2	57	29%
Suburban Locations	11	12	4	8	9	9	2	4	32	91	46%
Rural Locations	4	18	2	4	4	3	0	3	14	52	26%
Population Served	992,394	NA	600,000	855,000	446,000	639,921	756,000	399,256	13,000,000	17,688,571	
Overall Poverty Rate	19.0%	NA	NA	14.4%	6.5%	17.3%	19.0%	16.4%	12.0%		
Students Eligible for Free/Reduced Lunches	NA	NA	37.9%	NA	26.0%		56.0%	NA	NA		
Unemployment Rate		18-25%									