



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MOLLY M. SPEARMAN
STATE SUPERINTENDENT OF EDUCATION

MEMORANDUM

TO: District Superintendents
District Contacts for Internet, Technology, and Online Learning

FROM: Betsy Carpentier
Deputy Superintendent, Data, Technology, and Agency Operations

DATE: July 27, 2020

RE: Applications for Internet Hotspots and Service

DEADLINE: Complete Orders Received by **August 5, 2020**

Under Act 142, your district may order free internet hotspots and internet service through December 2020 under a program by the S.C. Office of Regulatory Staff (ORS). (The language of the Act relevant to this program is quoted below.) Because of plans to start school in August and the December limits on this funding, the timeline for submitting your orders under this priority is short: Wednesday, **August 5, 2020**. After that date, ORS may accept orders but fulfillment of those orders depends upon available inventory and funding. This memorandum summarizes the free internet offer requirements and an option for district-paid internet for staff and other students.

Districts that received priority because of county poverty levels have through today to complete their priority applications.

Free Internet From ORS Through December 2020

To order the free internet service, your district needs to complete and return the following:

1. The signed memorandum of understanding with the ORS; and
2. The ORS order for internet service and equipment with a signed certification.

These documents (attached) must be returned by email to ORS, csims@ors.sc.gov and tallen@ors.sc.gov. The S.C. Department of Education (SCDE) also requests that a copy be sent to Hotspots@ed.sc.gov so that we can better assist you in this process.

The law limits the households eligible for free internet to households meeting all of the following:

- Households with a student; and
- Households with an income at or below 250 percent of federal poverty (see chart below); and
- Internet that was not already part of the district's budget on March 27, 2020; and
- Internet service that is not duplicative (the household has no internet service); and
- Internet that is needed because of the pandemic and for educational purposes.

Our recommendation for how to proceed related to the free internet is as follows:

1. Was the district providing internet or hotspots and did the district have the expenditure in its budget on March 27, 2020? If "yes," then for those households the expenditures cannot be covered by the CARES Act. If the answer is "no" for any student households, please continue.
2. Does the district have an existing contract for internet service (regardless of whether it existed on or before March 27)? If "yes," the district must determine whether that contract can be terminated to take advantage of the free offer. If the answer is "no," or if a contract is determined eligible for termination, please continue.
3. For any students who did not have district-paid internet on March 27, which student households do not have internet sufficient for online learning? (Either because there is no internet service provider or because of economics). NOTE: If the student household already has internet, then the expenditure is not eligible under the CARES Act because (a) the expenditure is not necessary related to the pandemic; and (b) the service would be duplicative. Various methods are being used to determine which students have internet:
 - a. Some districts have put out family surveys.
 - b. Others have been making phone calls, either automated or with phone trees.
 - c. Other districts have information from the spring based on teacher feedback.
 - d. It is up to the district to come up with a method of determining which households do not have internet. The district is required to certify on the MOU and order form the eligibility of households.
4. Which of those households without internet meet the 250 percent of poverty requirement in the law?
 - a. If the student is marked "PIP" in PowerSchool for EFA funding, then the student is at 208% of poverty or less, and meets the income threshold for eligibility.
 - b. If the student is not PIP, then the district needs some method of determining whether the household meets the income guidelines quoted below. E.g., a family of four at \$65,500/year or less would be eligible. It is the district's responsibility per the MOU and order form to certify that families meet the income requirements. NOTE: The district can submit multiple orders, for example, first for PIP students and later for other student households meeting the poverty guidelines.
5. For the ones without internet, who meet the income guidelines, what are the best internet service providers in that area? Please note:

- a. Your designation on an order form of the preferred internet service provider is a request only.
 - b. For this program, the ORS will be assessing the most cost effective equipment and service.
 - c. The ORS is in the process of negotiating with additional internet service providers, both wireless and wired.
 - d. If an internet hotspot does not work for a particular address, the ORS will work with the district on wired options. Household addresses will be needed to determine the best options. Please use the draft reporting form to provide addresses without personally identifiable student information.
6. ORS will need the addresses for the locations where the hotspots or internet service are being provided for reporting per the grant administrator. Please note that the internet service providers are reviewing those addresses (without PII) and providing ORS with information on where they already have service. A copy of the reporting template is attached.

Your district will receive an email from SCDE staff asking to set up an appointment to walk you through this process and the order form. If you have not received this request, please email Hotspots@ed.sc.gov with some suggested times to meet.

Additional information on the ORS program is [available online](#). To complete your order, by August 5 please send the MOU and order form by email to ORS, csims@ors.sc.gov and tallen@ors.sc.gov, with a copy to Hotspots@ed.sc.gov.

District-Purchased Internet for Staff and Ineligible Student Households

The free internet offer does not apply to staff members, student households above the poverty level, households that have internet, and student households that had district-provided internet in the budget on March 27, 2020. The ORS is allowing SCDE to negotiate with the internet service providers to offer similar pricing for these households that are ineligible for the free offer (the “SCDE Program”). We have not completed all of these negotiations, but are seeking information on which districts are interested in what volume of orders.

Despite taking orders now, the SCDE Program will not be supplying hotspots until after the deadline for applications related to the students eligible under Act 142. If the district already is supplying hotspots or internet service, there are at least two questions to be answered:

1. Is there an existing contract with an internet service provider? If “yes,” then the district must determine whether this contract can be terminated or amended and replaced with service under the SCDE Program.
2. Assuming any service can be transferred to the SCDE Program,
 - a. As to existing district-owned hotspots, the district must find the International Mobile Equipment Identity (IMEI) (instructions listed below). The internet service provider (ISP) will review the IMEI to determine whether the equipment is compatible with the ISP’s network.

- b. As to wired service, the district must supply the addresses and information on the ISP for review of whether an agreement has been reached for educational-use internet service during School Year 2020-21. Please supply addresses without PII.

The SCDE staff member who is contacting your district can also walk the district through the current options for district-funded internet at favorable pricing.

To receive the separate order form for district-purchased, lower-priced internet, please email Hotspots@ed.sc.gov.

Questions

If you have questions that are not answered during your virtual meeting with the SCDE staff, please email them to Hotspots@ed.sc.gov, or contact the SCDE staff member with whom you met.

Additional Information Mentioned Above:

Act 142, Section (B)(1):

The Office of Regulatory Staff, in consultation with the State Department of Education and the Commission on Higher Education, shall procure mobile hotspots and monthly service through December 2020 for distribution to a minimum of one hundred thousand households. Eligibility shall be limited to households with an annual income of two hundred fifty percent or less of federal poverty guidelines that also has an individual attending a public or private K-12 school or a public or private college, university, or technical college. School districts, private schools, and institutions of higher learning will be responsible for distributing the hotspots and ensuring that appropriate security measures are installed on each hotspot. Priority should be given to households in counties that contain a school district that has been defined by the Department of Education as having a poverty rate greater than or equal to eighty-six percent.

2020 Federal Poverty Guidelines

Household - Family Size	250% Annual	250% Monthly
1	31,900	2,658
2	43,100	3,592
3	54,300	4,525
4	65,500	5,458
5	76,700	6,392
6	87,900	7,325
7	99,100	8,258
8	110,300	9,192
9	121,500	10,125
10	132,700	11,058

Compatibility of Participant-Owned Equipment

The following are Verizon's instructions for collecting the IMEI. Verizon is not, however, the only vendor under review with ORS. If the district collects the IMEI information, we anticipate that the vendors will be able to look up the devices and determine verify coverage.

How to find device ID on Windows Laptop:

<https://www.verizon.com/support/knowledge-base-205836/>

How to find device ID (IMEI) on iPad: <https://support.apple.com/en-us/HT204073>

How to find device ID on Jetpack/ Hotspot, USB Stick, and most other

devices: <https://www.verizon.com/support/knowledge-base-55843/> (There is usually a sticker on the back of the device.)

Enclosures:

- Memorandum of Understanding (must be signed and returned to ORS)
- ORS-Admin Subrecipient Agreement
- ORS Order Form for Free Internet Through December 2020
- Draft Reporting Template for ORS

Other: Email Hotspots@ed.sc.gov if you wish to order district-funded internet for those households ineligible for the free offer.