

**October 28, 2014 FCC-USAC Webinar  
Q&A**

**FCC Form 460**

- For the 10,512 FCC Forms 460 that were received, are those unique HCP numbers or cumulative forms submitted?
  - This is the total number of forms submitted, representing 9,713 HCPs.
- What is the process for a consortium to add additional HCPs?
  - First, FCC Forms 460 should be submitted for each of the new HCPs. Then, a revised Consortia FCC Form 460 should be submitted to include the new HCPs (as well as an LOA).

**FCC Form 461**

- When will applicants be able to start filing FCC Forms 461 for the 2015 funding year?
  - Applicants can start filing FCC Forms 461 on January 1, 2015. Please see the [FY2015 Application Timeline](#) for additional details.
- Of the 9485 forms that have eligibility determined, can you please indicate how many of those were approved and how many of those were denied?
  - Approved = 8,000
  - Denied = 1,231

**FCC Form 462**

- Do you have a target date for completion of processing of the FY2013 FCC Forms 462?
  - We anticipate completing FY2013 FCC Forms 462 by the end of November 2014 to allow HCPs to submit invoices by December 31, 2014.

**FCC Form 463**

- Is there any plan to combine the Telecom invoicing and FCC Form 463 review portals?
  - My Portal is set up so that the Telecom and HCF programs are separate. As a result, you will find the respective invoicing function under each program's portal.
- Does the service provider receive an email notification when there is a form 463 waiting in the portal for approval?
  - Yes, the service provider receives an email when an FCC Form 463 has been submitted by an HCP and is awaiting review.

## **Eligibility**

- Is telephone service eligible for reimbursement in this program?
  - No. Plain Old Telephone Service (“POTS”) is not eligible for reimbursement through the HCF Program. POTS is, however, eligible for reimbursement through the Telecommunications Program.
- Can an individual entity with multiple locations apply as a consortium?
  - Yes, an individual entity with multiple locations may apply as a consortium.
- If a post-secondary educational institution provides healthcare related instruction and receives funding; is the entire institution eligible to use the funded service, or are only the departments within the institution that directly provide the healthcare instruction eligible to use the service?
  - Only the portion of the institution directly related to the provision of healthcare is eligible.
- When will RHC have definitions of eligible expense categories like those found in the E-Rate Program?
  - Eligible expenses are spelled out in the HCF Order.

## **Competitive Bidding**

- What is the definition of an RFP?
  - A Request for Proposal, or RFP, is a formal bidding document used to facilitate open, competitive bidding for goods and services. The RFP describes the project and requests services in sufficient detail so that potential bidders understand the scope, location(s), time frame, minimum service levels, and any other requirements. An RFP must also describe the evaluation criteria which will be used to determine the winning proposal. Applicants using an RFP for competitive bidding (per requirements or voluntarily) are required to submit the RFP with their FCC Form 461. USAC recommends consortia applicants submit an RFP with their FCC Form 461 to better facilitate the process of requesting a future site or service substitution. Sample RFPs are available on the [Sample Documents page](#).
- If there no responses to an RFP, can it be revised and re-posted in the same funding year?
  - Yes, it can be revised and re-posted in the same funding year.
- Are there time constraints on the number of RFPs an HCP can submit in any given year?
  - No, an HCP may submit as many RFPs as necessary.
- How should I submit an RFP for review? Should I send it to the Help Desk email address?
  - The RFP should be submitted together with the FCC Form F61 through My Portal.

- What are the HCF Program competitive bidding exemptions?
  - Applicants that meet one of the following criteria are exempt from submitting the FCC Form 461 and participating in the competitive bidding process:
    1. The request for support is for \$10,000 or less of total undiscounted eligible expenses for a single year (note that applicants selecting this option cannot also request multi-year funding commitments).
    2. The applicant is purchasing services from a master service agreement (MSA) negotiated by a federal, state, Tribal, or local governmental entity on its behalf, and which was awarded pursuant to applicable competitive bidding requirements.
    3. The request for support is using MSAs previously endorsed by USAC under the Pilot Program or the HCF Program.
    4. The applicant has an existing contract deemed evergreen for the Rural Health Care Program prior to January 1, 2014 (for the life of the contract).
    5. The applicant is using a contract negotiated under the Schools and Libraries (E-rate) Program.

Applicants that do not meet any of the exemptions above are required to competitively bid for services by posting the FCC Form 461.

Applicants that are required to competitively bid for services should determine their service needs, prepare an RFP if applicable, and develop evaluation criteria. The evaluation criteria are used to select the most cost-effective service provider before submitting the FCC Form 461.

- For a non-evergreen contract, if my HCP goes through the competitive bidding and decides that staying with our current service provider is the most cost effective solution due to termination fees, is that an acceptable rationale?
  - Termination fees are not to be considered in the cost effectiveness evaluation. As such, we would need more information to determine if the decision to stay is appropriate.

### **Commitments**

- What causes the difference between commitments and disbursements?
  - Commitments represent approved funding for a project. Disbursements are invoices that have been paid. The difference between commitments and disbursements is usually in relation to the invoices submitted by applicants. USAC doesn't make disbursements until invoices have been approved. There are other cases that may cause variance, for example the termination of service, etc.

- Multiyear commitments to consortia seem to be well established. What is the status of multi-year commitments to individuals? What are the road blocks, if any?
  - There are multi-year commitments on the individual side, however the number of multi-year requests is much lower in comparison to that of consortia. There aren't many road blocks, outside of determining the contract endorsement type and funding dates.
- How do you find how much funding has been disbursed per state?
  - The RHC Program is planning to post commitments and disbursements per state on the USAC website. Stay tuned for updates!

### **Invoicing**

- Is it mandatory to provide the applicant with a 65% credit on their invoice, forcing service providers to finance applicants' bills way past the due date?

No. The service provider may refund the customer in the manner that they choose (invoice credit, check, etc.); it is between the service provider and the customer.

### **Getting Started with the HCF Program**

- For those of us who have not taken part of this program yet, can we get started on it now?
  - Yes, you may file an FCC Form 460 at any time to get started.
- It was stated that a telecom participant can transition to the HCF mid-year by just filing out FCC forms. But, the HCF Order only allows for a grandfathering of Telecom contracts through January 1, 2014. So if I have an applicant that enters into a NEW contract during FY2015, they would be "stuck" in Telecom, correct? If not, will the FCC issue guidance clarifying? See paragraph 265.
  - If an HCP participating in the Telecom Program wants to transition to HCF, and has a contract that does not have evergreen status as of 1/1/14, the HCP must undergo competitive bidding in HCF and make the most cost-effective selection.
- Do I need to convert all of my telecommunications services from the FCC Forms 465/466 to the FCC Forms 460/461 or can I continue to use the FCC Forms 465/466?
  - If you are planning on participating in the HCF Program, the appropriate HCF Program forms must be submitted (FCC Forms 460/461). However, if you are receiving funding from the Telecom Program, you are under no obligation to switch to the HCF Program.

### **Training and Outreach Questions**

- What is the "standard" RHC response time for emails sent to RHC-Assist for both the HCF and Telecom programs?
  - We have recently added a full time Help Desk analyst in order to reduce our email response time. In the month of October (the first month our Help Desk analyst managed email traffic), over half of the emails to rhc-assist@usac.org were answered on the same day they were received, and the average response time was shortly over one business day.

### **Skilled Nursing Facility Pilot Program**

- You referred to a “pilot telehealth program” bumping the Skilled Nursing Facility (SNF) Pilot Program. Can you tell us more about the “telehealth pilot program?”
  - The FCC is considering conducting voluntary broadband experiments to improve patient access to healthcare, potentially using funds from the Rural Health Care Program or Connect America fund. The SNF Pilot Program is [deferred](#) until the FCC has decided whether or not to use these funds.
- With the Skilled Nursing Facility Pilot Project on hold, can we include them in our consortia?
  - Skilled nursing facilities are not currently considered eligible entities.

### **Other Questions**

- What types of changes are being contemplated for the RHC Program?
  - The RHC Program team is continually working with applicants and service providers to identify areas of improvement in the program. Currently, we are ramping up our staff to tackle upcoming My Portal changes, enhance customer service, and decrease reviewing and processing time.
- Will annual reporting be required for FY2014? Can you talk about what will be required in the annual reporting, please?
  - The Annual Report will be required for FY2014 and will be due September 30, 2015. The content and format of the reporting requirements are still being reviewed by the FCC.
- Does a consortia ID expire due to inactivity (i.e. a consortia created in 2010 that has not yet issued RFPs)?
  - No, a consortium HCP number does not expire.
- If a circuit upgrade is required, how is this handled?
  - A circuit upgrade must have been contemplated in the request for service phase (FCC Form 461/RFP) and in the awarded contract in order to avoid having to go through a new competitive bidding process. Service upgrades would be handled through our site/service substitution process. For those consortia or HCPs requiring site and service substitutions for HCF commitments made, please contact the RHC Help Desk for further assistance.