



2016 Service Provider Training

Invoicing for Success

June 20, 2016 | Los Angeles, CA

June 30, 2016 | Atlanta, GA

Today we'll talk about:

- E-rate Modernization Order on Direct Applicant Payment
- Invoice Process Changes for Service Providers
- Invoice Process Changes for Applicants
- FCC Form 498
- Common Invoicing Mistakes
- Deadline Extensions
- Appeals and Waivers

Invoicing

**E-rate Modernization
Order on Direct
Applicant Payment**

E-rate Modernization Order on Direct Applicant Payment

- E-rate Modernization Order directive to pay applicants directly when BEAR option chosen
- Service provider no longer certifying applicant invoices
- Certification changes
- No paper forms
- Invoice deadlines established as a rule
 - Missed deadlines – Waiver of rules needed

E-rate Modernization Order on Direct Applicant Payment

- **FCC Form 472**
 - Billed Entity Applicant Reimbursement (BEAR)
 - Filed online
 - Applicant files and gets paid directly
 - Service provider still has access to filed BEARs
- **FCC Form 473**
 - Service Provider Annual Certification (SPAC)
 - Filed online by service provider
 - Filed using E-File

E-rate Modernization Order on Direct Applicant Payment

- **FCC Form 474**
 - Service Provider Invoice (SPI)
 - Filed online or electronically using csv file
 - System remains essentially the same – but no paper
- **FCC Form 498**
 - Service Provider Identification Number
 - Provides banking information
 - Filed using E-File

E-rate Modernization Order on Direct Applicant Payment

- **Invoice Systems**
 - Still use current system
 - Some changes to old process due to E-rate Modernization Order
 - Access paths remain the same
 - Process essentially remains the same
 - No paper forms

Invoicing

Invoice Process Changes for Service Providers

- **FCC Form 473**
 - Changes for July 1
 - Service provider logs into E-File to access FCC Form 473
 - Service Provider Annual Certification (SPAC)
 - Pre-filled information available when access form
 - Obtained from E-File contact data
 - Service provider reviews and certifies
 - Changes immediately recorded in SPIN Search Tool

Invoice Process Changes for Service Providers

Current SPAC Process

Service Provider
fills out SPAC on
paper



USAC keys
in paper
form

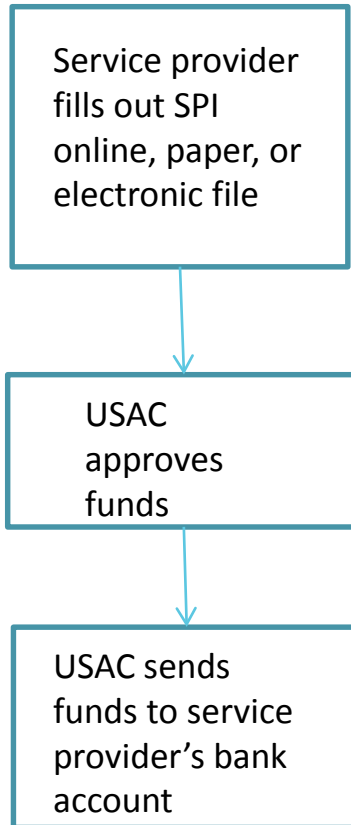
SPAC Process – beginning July 1, 2016

Service Provider
fills out SPAC
online via E-File

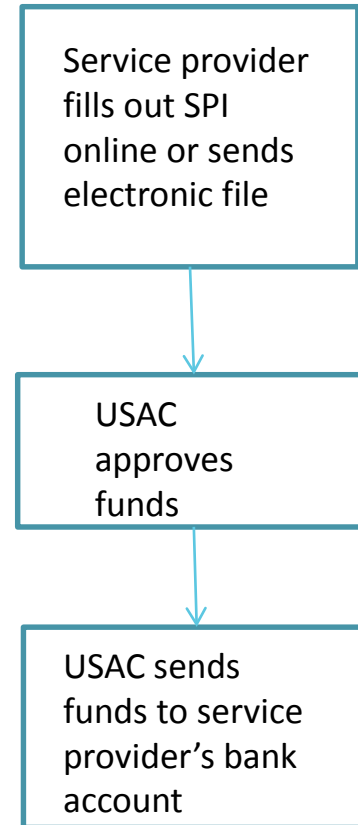
- **FCC Form 474**
 - Changes for July 1
 - No paper form
 - No process changes
 - Only new form with new certifications

Invoice Process Changes for Service Providers

Current SPI Process



SPI Process – beginning July 1, 2016



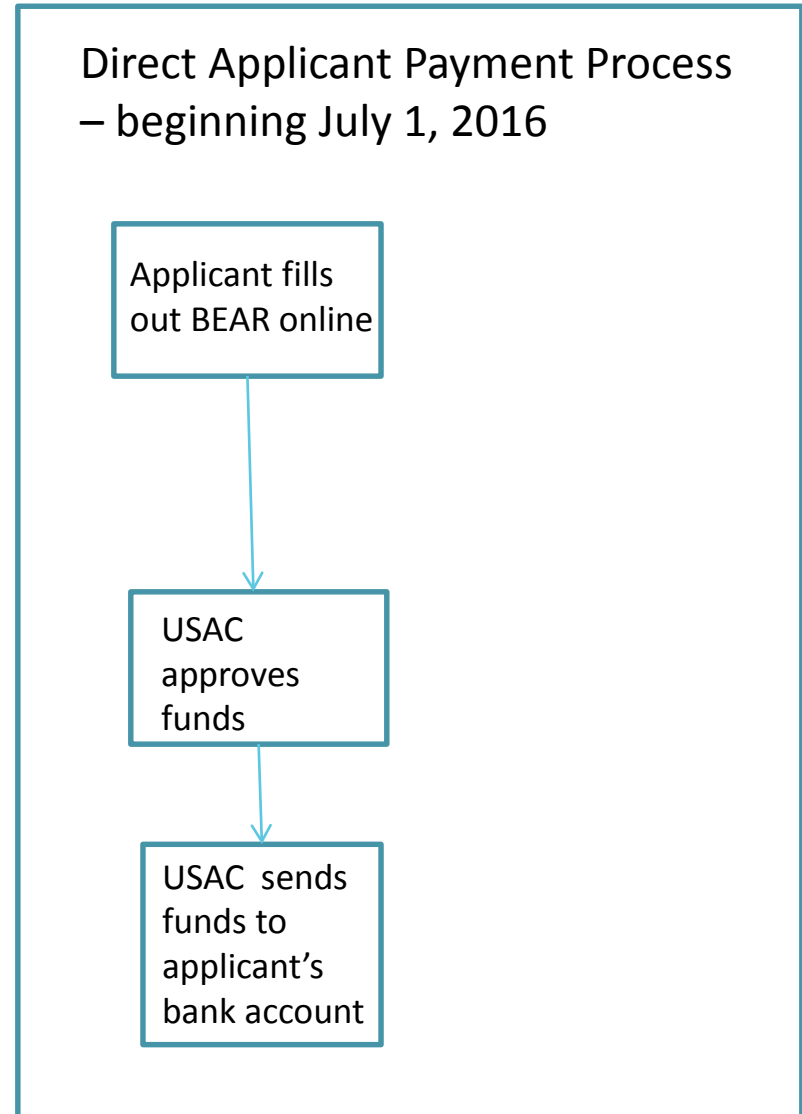
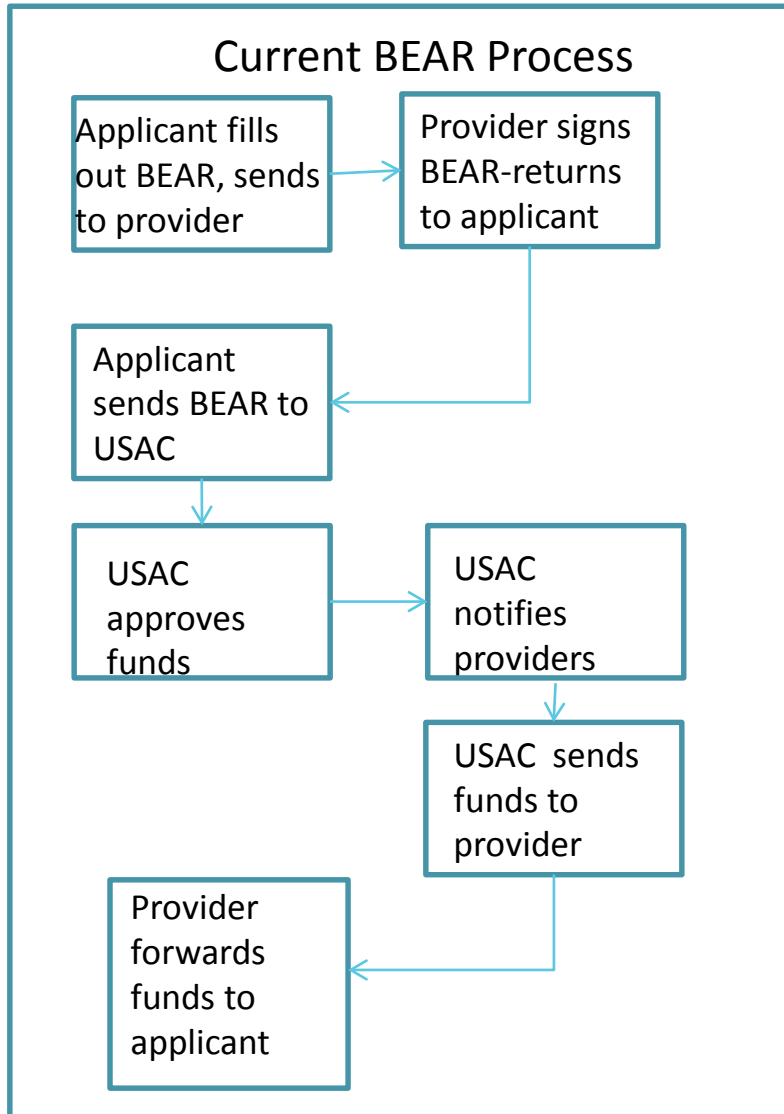
No change in process

Invoicing

Invoice Process Changes for Applicants

- **FCC Form 472**
 - Changes for July 1
 - Applicant files FCC Form 498 to provide bank account information
 - Only online BEAR used to create invoice
 - Applicant files the BEAR for processing
 - No service provider certification
 - FCC Form 498 ID added to identify bank account
 - Dropdown list of bank accounts provided via FCC Form 498
 - Approvals must be paid directly to applicant

Invoice Process Changes for Service Providers

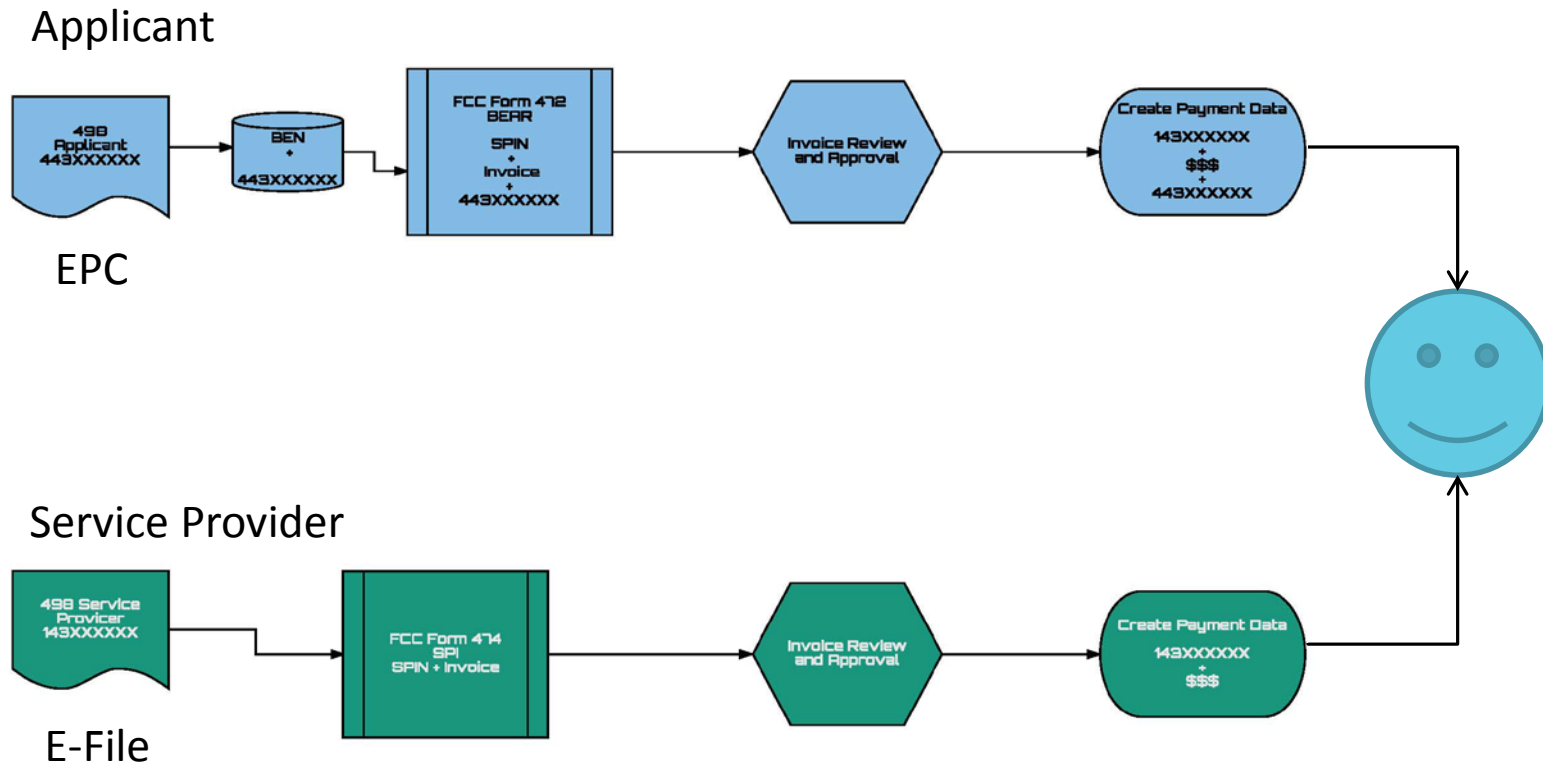


Invoicing

FCC Form 498

- **FCC Form 498**
 - No changes for July 1
 - No process changes
 - Access form in E-File

Invoice Process Changes for Service Providers



Invoicing

Common Invoicing Mistakes

- Commitments are NOT grants – can only bill for services actually delivered, even if that amount is less than the commitment amount
 - Services not eligible
 - Service provider not listed on 471
 - Services billed to party not listed on 471
 - Services not listed on Item 21
 - Services delivered outside funding year
 - Services delivered to location not listed on 471

- Service Certifications
 - Customer bill does not identify services
 - Items on customer bill not found on Item 21
 - Service provider not certified by filing FCC Form 473
 - Service substitutions not requested
 - Services delivered outside contract dates
 - Name on bill does not match 471

- Payment of beneficiary portion confirmation requests
 - Proof of payment not returned when requested
 - Check does not demonstrate clearing bank
 - Check already shows payment for another invoice
 - Documents not from bank website
 - Payment validation not verified by applicant

Invoicing

Deadline Extensions

Service Delivery and Installation Extension

– Automatic

- Late FCDL, Appeals
- SPIN Changes, Service Substitutions
 - March 1 key date
 - Extends until September 30 of the following year

Service Delivery and Installation Extension

– Must File a Request

- Filed by the Billed Entity – by September 30 for non-recurring services
- Must be filed on FCC Form 500 (FCC Form 500 is also used to adjust the Contract Expiration Date)
- Must provide a reason
- When the service provider is unable to complete delivery and installation for reasons beyond the service provider's control
- When the service provider is unwilling to complete delivery and installation after USAC withheld payment for those services on a properly submitted invoice for more than 60 days after submission

Invoice Extension

- Invoice Filing Deadline
 - Invoices must be submitted to the Administrator:
 - (1) 120 days after the last day to receive service, or
 - (2) 120 days after the date of the FCC Form 486 Notification Letter, whichever is later. – 54.514 (a)
 - Must be filed by billed entity or service provider
 - Consultants may file if they have a Letter of Agency

Invoice Extension

- Invoice Deadline Extension
 - In advance of the deadline pursuant to paragraph (a), service providers or billed entities may request a **one-time** extension of the invoicing deadline.
 - The Administrator shall grant a 120-day extension of the invoice filing deadline, if it is timely requested. – 54.514(b)
 - No longer need to provide a reason for the extension request

Invoicing

Appeals and Waivers

- Appeals must be filed with USAC first
 - May appeal decisions to reject invoices
 - May appeal decision to modify invoices
- Must appeal within 60 days of decision letter
 - Remittance Statement
 - Other decisions – FCDL, COMAD, SPIN change, etc.
- Cannot appeal missed deadline

- Waivers
 - Must request waiver if decision based on rule
 - Missed invoice deadline
 - Missed extension request deadline
 - Must reference CC Docket No. 02-6
 - Must be sent to FCC
 - May use Electronic Comment Filing System

With questions, please contact us!

Mick Kraft

Senior Manager of Invoicing

Phone: (202) 776-0200

Email: mkraft@usac.org

Website: www.usac.org

Thank you!