



Top Tips for Tribal Applicants

2018 E-rate Tribal Training



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Administrative Co.

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AGENDA

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2. Non-Traditional Education
3. Tribal Library Participation
4. Voice Phase Down
5. Competitive Bidding
6. Category Two Budgets
7. Managing Deadlines
8. Streamlining Your Workload
9. Tribal State Match
10. BIE School Guidance

CHECK THE TRIBAL BOX

- Check the “Tribal” box located in the entity profile of the E-rate Productivity Center (EPC).
 - You may check the “Tribal” box if the majority of students or library patrons served are Tribal members; you are located partially or entirely on Tribal land; you are a school operated by or receiving funding from the Bureau of Indian Education; or you are a school or library operated by a Tribal Nation.
- Checking the box helps USAC understand who is participating in the program. We can:
 - Provide Tribal outreach and training
 - Assess Tribal training efforts through participation

NON-TRADITIONAL EDUCATION

- Some examples of non-traditional, Tribal facilities are:
 - Pre-K
 - Head Start
 - Juvenile justice
 - Adult education
- These entities are eligible if they fit the definition of elementary/secondary education for the state within which they are geographically located.
- Look up non-traditional facility eligibility by state on our [website](#).

TRIBAL LIBRARY PARTICIPATION (Eligibility)

- Tribal libraries are eligible for E-rate if they are:
 - Not-for profit,
 - Financially independent from any school budget, and
 - Eligible for LSTA funding in the state within which they are geographically located.
 - ◇ Contact the state librarian to find out if your library is eligible for state LSTA funding.
 - ◇ Some state librarians provide a letter of approval.
 - ◇ The Tribal Liaison can help coordinate with the state librarian.

TRIBAL LIBRARY PARTICIPATION

(Calculating Discounts - Poverty)

- The E-rate program uses the National School Lunch Program (NSLP) to determine applicants' poverty level.
- An independent library uses the NSLP figure for the public school district in which it is located.
 - If the library is not physically located within a district, it should use the figure for the school district geographically closest to it.
 - If the library is a system with multiple branches, it should use the figure for the school district in which the main branch of the library is located.

TRIBAL LIBRARY PARTICIPATION

(Calculating Discounts – Urban/Rural)

- Urban or rural status is based on 2010 census data.
 - Check your status on our website with the [urban/rural tool](#).
- Enter your entity's **physical** address in the EPC profile and urban/rural status will be determined automatically.
 - Ensure the address is accurate to calculate the correct status.
 - If EPC doesn't recognize your address, manually enter latitude and longitude (from Google Earth or another source).

VOICE PHASE DOWN

What does it mean?

- Eligible voice services in the E-rate program have been phased out.
- **In FY2019 voice services will no longer be eligible.**

COMPETITIVE BIDDING (Reminders)

- Competitive bidding is a formal process to choose the vendors/service providers who provide your products and services.
 1. Describe your desired services and requirements using FCC Form 470 (and RFP if applicable).
 2. Service providers read your documents and bid on your services.
 3. Wait a minimum of 28 days then compare the offers you receive.
 4. Select the most cost-effective bid using price of the eligible products and services as the primary factor in a bid evaluation matrix.



COMPETITIVE BIDDING

(Managing a multi-year contract)

- Applying for E-rate for the first time but already receiving services in a multi-year contract?
Remember to:
 - File FCC Form 470.
 - Consider your current contract as a bid along with any other incoming bids.
 - Evaluate all bids fairly and equally using a competitive bidding matrix.
 - You cannot receive discounts on the pre-existing contract if another bid was more cost-effective.

COMPETITIVE BIDDING

(My tribe's telco wants to submit a bid)

- What you **should** do:
 - Keep the competitive bidding process open and fair.
 - ◇ Information shared with one bidder must be shared with all.
 - ◇ Bidders must be evaluated fairly and equally.
 - Track any helpful information your tribe's company might have access to and make sure the knowledge is shared with all potential bidders via FCC Form 470 or RFP.
 - Document the processes and procedures you put in place to make sure the line between applicant and service provider do not blur.

COMPETITIVE BIDDING

(My tribe's telco wants to submit a bid)

- What you **should not** do:
 - Don't share internal information about the competitive bidding process.
 - Don't share staff.
 - Don't share finances.
 - Don't select the tribe's bid if it's not ***cost-effective***.

COMPETITIVE BIDDING

(Only one vendor serves my region)

- What you **can** do:
 - Solicit a bid if you don't receive one.
 - Ask your current service provider to submit a bid.
 - Accept a single incoming bid if it's cost effective.
 - **Always** document your decision with a memo or email for your records.

COMPETITIVE BIDDING

(Only one vendor serves my region)

- What you **cannot** do:
 - Don't neglect conducting a competitive bidding process.
 - ◇ Always follow the competitive bidding rules and the 28-day waiting period unless you have an FCC Form 470 exemption.
 - Don't accept the bid if it's not ***cost-effective***.

CATEGORY TWO (C2) BUDGETS

- USAC calculates a C2 budget for each individual school or library.
 - An entity cannot share its budget with other schools or libraries.
- The school or library can receive discounts on the cost of C2 services up to its C2 budget amount.
- The budget **lasts 5 years**; you have the choice to
 - Use the entire budget in one funding year, or
 - Allocate over different funding years.
- Spend the budget on one, two, or all three C2 service types.

CATEGORY TWO (C2) BUDGETS

- The C2 budget is re-calculated every year.
 - More students in a school or expansion of the library results in a budget increase.
 - Fewer students in a school or downsizing in a library results in a budget decrease.
 - ◇ If the C2 budget decreases below funding already spent for the five-year period, the school or library does not have to reimburse USAC for the discount on the difference between the budget and the pre-discount amount.

WHAT'S MY FIVE-YEAR C2 BUDGET?

(All figures are for FY2018)

- Budget calculations are based on the total number of students – including peak part-time (for schools) or the total internal square footage (for libraries).
- The C2 budget **multiplier** is adjusted each year for inflation.
 - Schools:
 - ◇ # of students x **\$156.231951** (multiplier) x Discount
 - Libraries:
 - ◇ Square footage x **\$2.395556582** (multiplier) x Discount
 - ◇ \$5. 2077317 for urban libraries

WHAT'S MY FIVE-YEAR C2 BUDGET?

(All figures are for FY2018)

- There is a minimum budget of \$9, 582.23 for small schools and libraries.
 - If the budget calculation results in a value less than \$9, 582.23, the school or library's pre-discount budget is set at this minimum pre-discount budget.
- Remember to subtract previously committed C2 funding since FY2015.
 - (Pre-discount budget) – (Pre-discount amounts committed in prior funding years) = *Remaining C2 Budget*.

MANAGING DEADLINES

(Fixed deadlines)

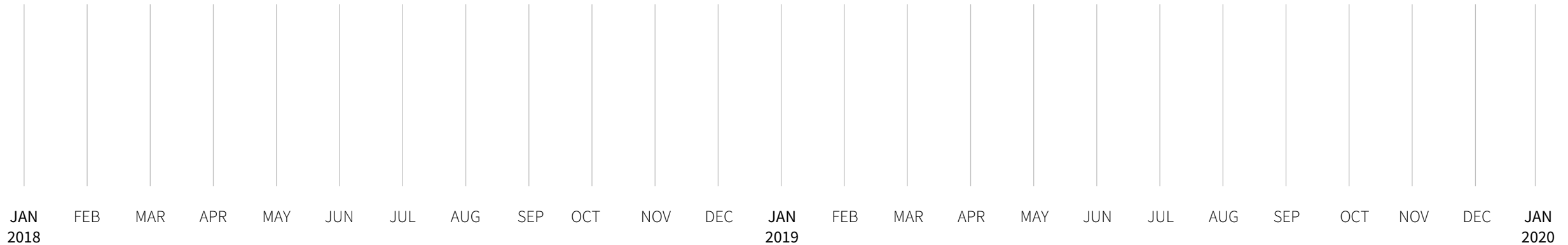
- FCC Form 470 deadline
 - Always file a minimum of **28 days** before the last day of the FCC Form 471 filing window.
 - ◇ We recommend filing earlier.
- FCC Form 471 deadline
 - Always file only during the application filing window (exact dates vary each year).
 - File by 11:59 PM EDT on the last day of the filing window.

MANAGING DEADLINES

(Moving deadlines)

- Use the deadlines [tool](#)
- FCC Form 486
 - Deadline is 120 days after service start date or 120 days after the date of the FCDL — whichever is later.
- FCC Forms 472 and 474 (invoicing)
 - Deadline is 120 days after the last day to receive service or 120 days after the date of the FCC Form 486 Notification Letter — whichever is later.

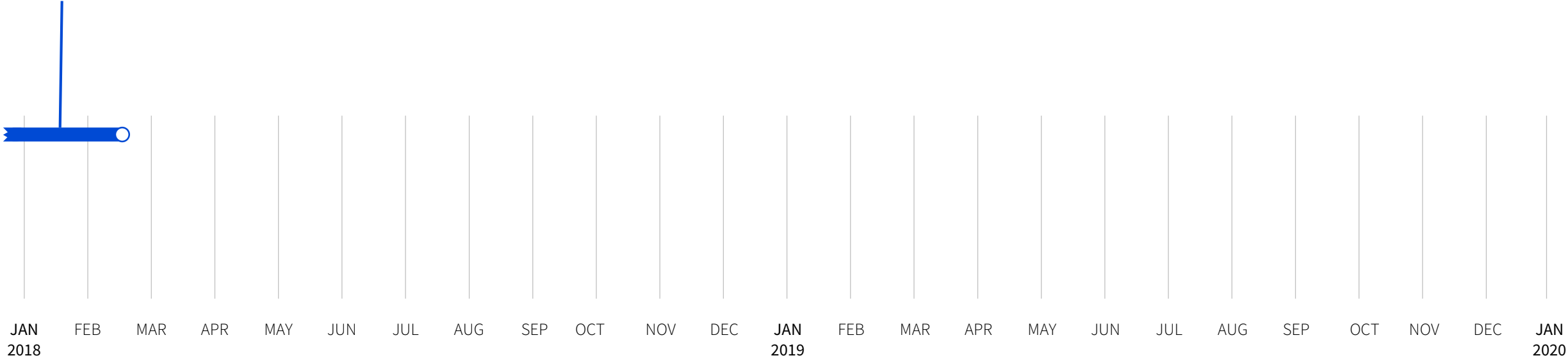
FUNDING YEAR (FY) 2019 APPLICATION PROCESS TIMELINE -- dates are tentative --



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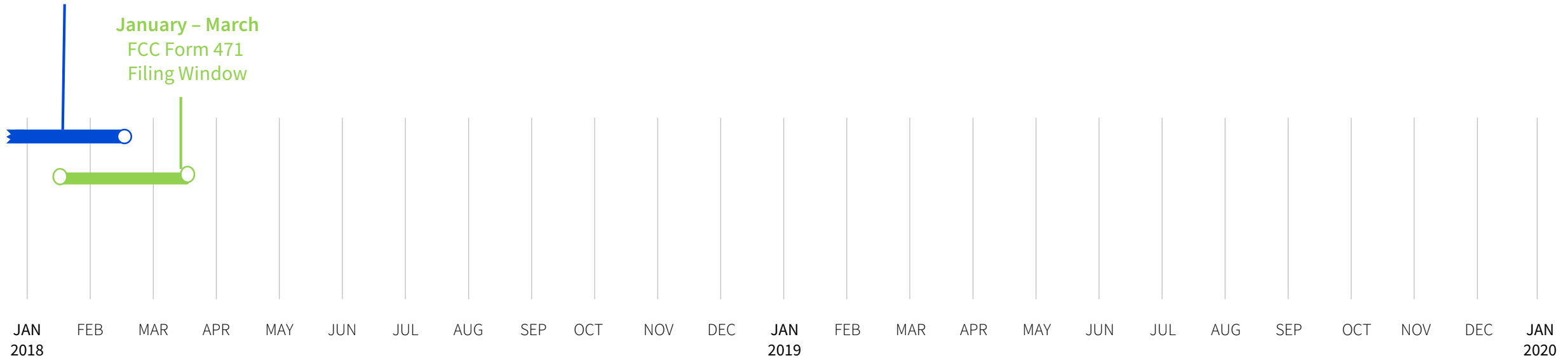
July – February
FCC Form 470
Competitive
Bidding



FUNDING YEAR (FY) 2019 APPLICATION PROCESS TIMELINE -- dates are tentative --

July – February
FCC Form 470
Competitive
Bidding

January – March
FCC Form 471
Filing Window



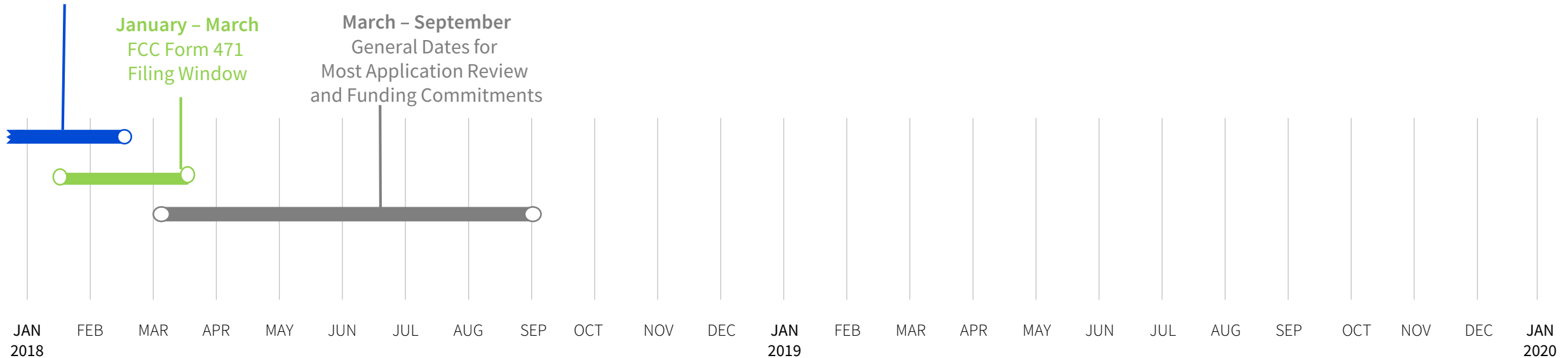
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July – February
FCC Form 470
Competitive
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January – March
FCC Form 471
Filing Window

March – September
General Dates for
Most Application Review
and Funding Commitments



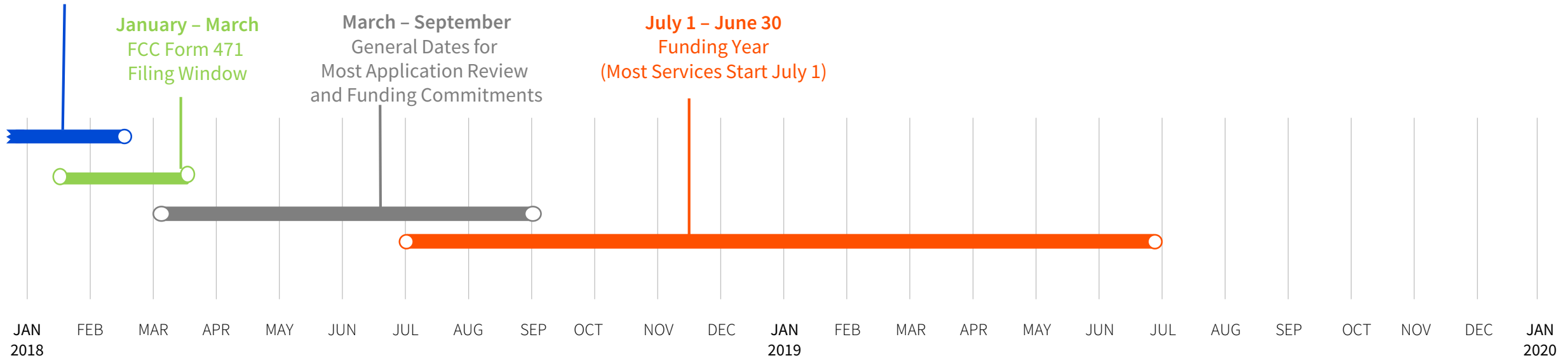
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January – March
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Filing Window

March – September
General Dates for
Most Application Review
and Funding Commitments

July 1 – June 30
Funding Year
(Most Services Start July 1)



FUNDING YEAR (FY) 2019 APPLICATION PROCESS TIMELINE

-- dates are tentative --

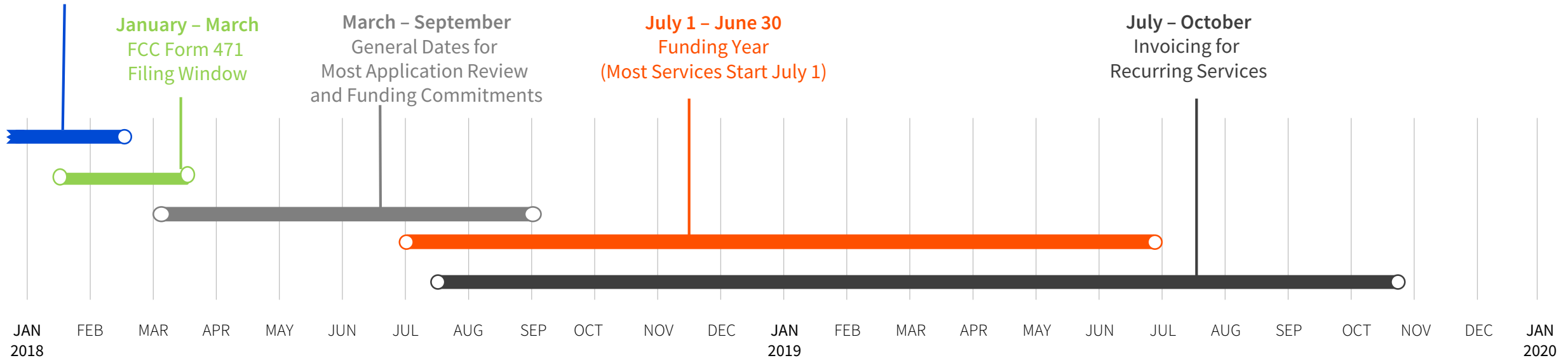
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July 1 – June 30
Funding Year
(Most Services Start July 1)

July – October
Invoicing for
Recurring Services



FUNDING YEAR (FY) 2019 APPLICATION PROCESS TIMELINE -- dates are tentative --

July – February
FCC Form 470
Competitive
Bidding

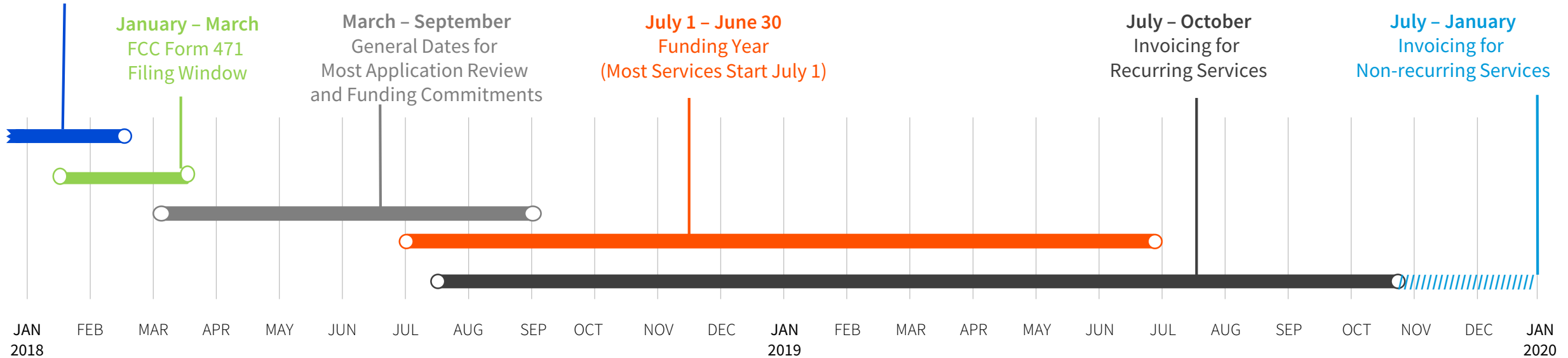
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Filing Window

March – September
General Dates for
Most Application Review
and Funding Commitments

July 1 – June 30
Funding Year
(Most Services Start July 1)

July – October
Invoicing for
Recurring Services

July – January
Invoicing for
Non-recurring Services



MANAGING DEADLINES

(Post-commitment deadlines)

- Invoice Deadline Extensions
 - You can request and receive one 120-day extension of the invoice deadline.
 - The request must be submitted on or before the original invoice deadline.
 - You do not need to provide a reason for your request
- Appeal Deadline
 - 60 days from the date of the decision

STREAMLINE YOUR WORKLOAD

- There are options to file fewer forms.
 - Using multi-year contracts means fewer FCC Forms 470.
 - Using SPI/discounted billing method means fewer invoicing forms.
- Try to group your form filing efforts.
 - File three forms in October:
 - ◇ FCC Form 470 (for upcoming year)
 - ◇ FCC Form 486 (for current year if you've received your FCDL)
 - ◇ FCC Form 472 BEAR (for previous year)
 - File FCC Form 471 during the filing window.

STREAMLINE YOUR WORKLOAD

- Form or join a consortium.
 - Only one member of the consortium files forms on behalf of all members (the consortium leader).
 - Beneficial for small schools and libraries or those inexperienced with E-rate.
 - Apply together on one application.
 - Share expertise by combining knowledge and personell resources.
 - Consortia can also include ineligible entities under limited circumstances and subject to cost allocation requirements.

TRIBAL STATE MATCH

If a state provides eligible schools and libraries with funding for special construction charges for high-speed broadband that meets the FCC's long-term connectivity targets, the E-rate Program will increase an applicant's discount rate for these charges up to an additional ten percent to match the state funding on a one-to-one dollar basis.

TRIBAL STATE MATCH

For Tribal schools and libraries, the E-rate Program will also match special construction funding provided by states, Tribal governments, or other federal agencies on a one-to-one basis, up to an additional ten percent for the applicant's discount rate. Total E-rate support with matching funds may not exceed 100 percent.

BIE SCHOOL GUIDANCE

- Tribally operated schools can join the BIE consortium
 - You need to submit a letter of agency (LOA).
 - The consortium will then request internet on your behalf, but you cannot file for separate internet on your own.
- BIE-operated schools must invoice on your own, but under one shared FCC Form 498 ID (filed by BIE consortium leader).
 - Tribally controlled schools must still obtain your own FCC Form 498 ID.
- BIE's goal is to get all consortium members to 100 Mbps.

BIE SCHOOL GUIDANCE

- BIE Operated Schools are fully on a federal network – the Education Native American Network (ENAN).
- Here are some general guidelines:
 - ◇ All users must take security training annually.
 - ◇ There can be no non-federal connections to ENAN within the school.
 - Any additional circuits used by the school must be completely and physically separate (air gap).
 - ◇ Only government furnished equipment (GFE) may be attached to the network.
- All federal entities must comply with DOI security policies and federal security regulations.

BIE SCHOOL GUIDANCE

- Tribally controlled schools may use ENAN to obtain internet access.
 - Tribally controlled schools will use VPN to access BIE federal resources.
 - There can be no non-federal connections to ENAN within the school.
 - Any additional circuits used by the school must be completely and physically separate (air gap).
 - Tribally controlled schools' internal networks are not subject to regulations specific to federal entities.

Q&A SESSION

THANK YOU!