E-Rate News Brief

May 23, 2024

Contents

E-RATE TIPS:

• **June 30, 2024 is the last day to receive recurring services for FY2023**. If the same service provider will continue to provide your recurring service after June 30, you must use the Funding Request Number (FRN) approved for FY2024 when you are invoicing for recurring services that start on or after July 1, 2024.

• **IDD Reminder Notifications now in EPC**. USAC recently made updates to the E-Rate Productivity Center (EPC) to automate invoice deadline date (IDD) reminders. EPC **will now send a notification to the applicant, service provider, and consultant invoicing contacts three weeks prior to the IDD** for FRNs (FY2016 and forward) approaching the IDD deadline with no pending invoices or disbursements. USAC has been manually sending reminders since July.

• **Keep your invoicing permissions up to date**. To ensure invoices are timely reviewed, be sure your EPC user permissions are updated with the proper **BEAR/472** (applicants) and **Invoice Permissions** (service providers). Read the article titled [Review Your EPC Invoicing Permissions](#) for more details.

• **The Category Two (C2) budget mechanism** provides a maximum amount of funding for internal connections over a five-year budget cycle for schools and libraries. Applicants can view available remaining funding for the current C2 budget cycle (FY2021 to FY2025) or check if already committed C2 funding was not invoiced before the invoicing deadline, which could be canceled and made available for FY2025 if the applicant submits an FCC Form 500. View the [FY2021-2025 Category Two (C2) Budget Management Guide](#) for more information.

• View the **Program Integrity Assurance (PIA) Review and Selective Review Process Webinar**

Commitments for Funding Year (FY) 2024

FY2024. USAC released FY2024 Wave 4 Funding Commitment Decision Letters (FCDLs) on May 16. As of May 22, FY2024 commitments total over $1.23 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-Rate Productivity Center (EPC).

You can use the E-Rate Search Commitments Tool to lookup prior-year commitment data.

Responding to Program Integrity Assurance (PIA) Review Questions in EPC

In the April 2024 E-Rate News Brief, we provided an overview of the PIA review process. In this issue, we are including details about receiving and responding to PIA questions in EPC.

Receiving PIA Questions
EPC sends an email to let you know that questions are available through the EPC **News** tab.

The notification in the EPC **News** tab reads: **From the FCC Form 471 Review Team**. The notification includes identifying information from your form, along with your PIA reviewer's name, telephone number, and a hyperlink to your questions (the blue bar at the bottom of the notification).

TIP: Enter "471 Review Team" in the **News** search box and click **Enter** to find these notification(s) more easily.

You can also locate your questions in the **My Tasks** section of your landing page. The hyperlinked name for each task is "Respond to Notifications for FCC Form 471 [form number]."

The **News** item hyperlink takes you to the complete list of PIA questions, but the **My Tasks** hyperlinks take you to individual questions. For example, if you receive five PIA questions, you will see a list of all five questions if you use the **News** search option, and five separate tasks if you use the **My Tasks** option.

If you submitted more than one FCC Form 471 that requires PIA review, you will receive a separate set of questions for each form. However, if the same question applies to all your forms, your reviewer can link that question so that you only must answer it once. Provide the response to the inquiry for the first application. For subsequent inquiries on other forms, direct the reviewer to the first application that contains the response.

Accessing Questions
Click the hyperlink on the **News** tab in EPC to access the **Summary** page of the FCC Form 471, then click the **Review Inquiries** hyperlink to access your PIA questions.

The **Review Inquiries** page is the applicant's dashboard (repository) for all PIA questions for each application. Click on the hyperlink from the **Tasks** tab to access the dashboard directly. You can also select the **Records** tab, then **FCC Form 471**, then search for your FCC Form 471 number using the

search function. When you locate your form, click the **FCC Form 471 Number** hyperlink and then **Review Inquiries** from the top navigation.

You can perform the following actions from the **Review Inquiries** page by clicking the appropriate button at the top of the page:

1. Click on the "Respond to Inquiries" button to view and respond to your PIA questions. When you click this button, you will see the **Pending Inquiries** and **Submitted Inquiries** dashboards. These dashboards list the status of the PIA outreach, which includes the type of outreach, the date the reviewer sent the notification, the response due date, and the reviewer's name and telephone number. You will know if someone in your organization has viewed the inquiry because a blue eye icon will appear in the "Read" column.

- "Pending" inquiries are questions submitted by the PIA reviewer to the contact person.

- "Submitted" inquiries are responses that were submitted to the PIA reviewer.

When you select a pending inquiry, a template is displayed listing the PIA question(s) associated with that inquiry. You can enter your answers in the template, upload supporting documentation (a single document or multiple documents), and/or provide additional narrative information.

The system allows you to begin working on your answers and then save your work for later by clicking the **Save & Close** button. To return to your work, choose **Review Inquiries** while in the FCC Form 471 record.

- Only one user can work on a specific inquiry at one time, although different users can work on different inquiries simultaneously.

- One user can allow another user to review and/or edit their work by saving the draft response as described above and then exiting the inquiry.

You must provide complete answers and respond to all the questions. Contact your PIA reviewer if you are unsure of what to do or if you need clarification.

- If you do not respond to your PIA reviewer's questions within seven days, or if your response is incomplete, you will receive a reminder notification and your state E-Rate coordinator will also receive a notification.

- If you have not responded after 15 days and have not requested an extension (see below), we may process your application with the information on hand, which may lead to a reduction or denial of funding.

After you have finished your response, click the **Submit** button to send it to the PIA reviewer. Your submitted response will then appear in the **Submitted Inquiries** dashboard. Click the **Submitted Inquiries** header to expand this dashboard.

2. Requesting an extension of time to respond
You can request additional time to respond to your PIA review questions. We automatically grant a seven-day extension for your first request, and EPC will adjust your original 15-day response due date and display the result.

Subsequent extension requests are not automatic but must be reviewed by a PIA manager. If you require a second extension to respond to your PIA review questions, please reach out to your reviewer to explain the reason for the second extension. If we grant your request, EPC will feature the extended

date on the **Review Inquiries** dashboard. If we deny your request, our denial message will appear in the comments section at the bottom of the original PIA **News** notification.

3. Submitting a request to modify FCC Form 471 information
To provide additional information or correct existing information on your FCC Form 471 in advance or during the process of responding to PIA questions, you can submit modifications to your FCC Form 471 by clicking the **Submit Modifications Request** button on the **Review Inquiries** page.

Tips for responding to inquiries
Below are some tips for ensuring you provide complete responses.

- Enter a response in all fields; enter "N/A" when not applicable.

- Do not open the same task (inquiry) in multiple tabs or windows.

- When receiving outreach from a reviewer, please review the entirety of the ask and content of the outreach. There may be various response options. In many cases, the applicant may be able to directly provide the needed response and material without additional research or engaging state officials to obtain information.

- When providing a response, be prepared to cite the source of the information.

- **USAC does not request personally identifiable information** (PII). You **should not submit PII** with a response. If PII is part of a response document, **it must be redacted** prior to submission.

If you have unique situations, reach out to your reviewer to discuss these scenarios. These can be escalated for additional clarification or guidance, if needed.

Summer Contact Period ("Summer Deferral") Starts May 24, 2024

USAC processes program forms and requests as promptly as possible to issue timely decisions. If information is missing or incomplete, we may request additional information and/or documentation about your form or request. During this time of year, our most common reason for initiating contacts is to obtain more information about your FCC Form 471 to complete Program Integrity Assurance (PIA) reviews.

Our "**summer deferral period**" extends **from the Friday before Memorial Day** (i.e., May 24, 2024) **through the Friday following Labor Day** (i.e., September 6, 2024). Starting May 24, if our first attempt to contact you is on or after May 24, and we do not receive a response to our questions, we will put your application(s) on a deferred status and will continue the review of your application(s) sometime after September 6. During this period, please note:

- You can always contact us or respond to our pending questions to restart the review of your application(s) if you become available before September 6, and we encourage you to do so to expedite the review of your application(s).

- If the PIA reviewer has already contacted you and you wish to designate someone to answer questions in your absence, be sure to send your designee's contact information to your PIA reviewer. If the PIA reviewer has not contacted you and your designee will be checking your messages, be sure that you have provided written authorization for your designee to answer questions about your application(s).

- If the PIA reviewer makes contact with someone representing your organization but that person is not in a position to answer PIA questions, they should clearly state to the PIA reviewer that the review of your application(s) should remain on hold until you are available.

PIA questions are posted in EPC, and you will also receive an email from EPC notifying you to respond to the questions. Full- and partial-rights users on the organization's account can see and respond to the PIA questions.

If our first attempt to contact you was before May 24, the non-summer deferral PIA review process will continue, and you will be required to timely respond to PIA requests. Please respond promptly to any PIA requests for information or documentation. During the summer deferral period, USAC will only continue reviews of forms and requests where documentation has already been received or participants have responded to information requests sent in EPC. If participants do not respond during these periods, the form or requests will be placed in a deferred status until the deferral period ends, at which time we will continue our regular review process.

Filing the FY2024 FCC Form 486

After applicants have received a Funding Commitment Decision Letter (FCDL) with a positive funding commitment and services have started for the funding year, they must file an FCC Form 486 (Receipt of Service Confirmation and Children's Internet Protection Act Certification Form). The FCC Form 486 notifies USAC that services have started and certifies the status of the applicant's compliance with the Children's Internet Protection Act (CIPA).

Applicants will be able to file an FCC Form 486 for FY2024 as soon as they receive a funding commitment from USAC. Be sure to verify your status under CIPA and, if you are a member of a consortium, that you have completed your FCC Form 479 (Certification by Administrative Authority to Billed Entity of Compliance with the Children's Internet Protection Act Form) and provided it to your consortium leader.

Applicants can file an FCC Form 486 early – that is, before services have started. For the applicant to file early, all the following must be true:

- **Receipt of positive funding decisions**. You must have received an FCDL with at least one positive funding commitment. In EPC, you will not be able to file an FCC Form 486 for an FCC Form 471 Funding Request Number (FRN) unless USAC has issued a commitment for that FRN.

- **Service start dates and contracts**. You must confirm with your service provider(s) that the service(s) for your approved funding commitments will start in July of the funding year and create a legally binding agreement. You must also confirm that those services will be provided to the eligible entities identified on the FRNs.

- **Certifications**. You must certify that there are signed contracts covering all the services listed on the FCC Form 486, except for those services provided under tariff or on a month-to-month basis. You must also certify that you are authorized to submit the FCC Form 486 on behalf of the billed entity; that you have examined the form; and that to the best of your knowledge, information, and belief, all statements of fact provided on the form are true.

You can review the text of all the certifications on the FCC Form 486 after you have completed your entries for the required information on the form. Please review the certifications carefully to make sure that you can accurately make them as of the start of the receipt of discounted services. **Do not forget to check the Early Filing box** if that applies.

CIPA Reminders

In general, school and library authorities must certify that: (1) they have complied with the requirements of CIPA; (2) they are undertaking actions, including any necessary procurement procedures, to comply with the requirements of CIPA; or (3) CIPA does not apply because they are receiving discounts for telecommunications services only.

The administrative authority – the relevant authority with responsibility for the administration of the school or library – must report the status of compliance with CIPA.

- If you are the administrative authority for the school or library and you are the billed entity, you certify your status of CIPA compliance on your FCC Form 486.

- If you are the administrative authority but not the billed entity (e.g., a member of a consortium and the consortium files for discounted services on your behalf), certify your CIPA compliance status on the FCC Form 479 and provide a copy of that form to your consortium leader. Your consortium leader must have copies of FCC Forms 479 on file from all its members before it can accurately make the appropriate CIPA certifications on the FCC Form 486 on behalf of its members.

The CIPA page has all the requirements and actions you must undertake to demonstrate compliance with CIPA including having an internet safety policy, a technology protection measure, and holding a public hearing to present the internet safety policy. It also has information on the timing of CIPA compliance and the documentation required to demonstrate CIPA compliance.

Review Your EPC Invoicing Permissions

To access the invoicing features in EPC, a user must be granted **BEAR/472 permissions** (applicants) or **Invoice permissions** (service providers). EPC Account Administrators can grant users **Full**, **Partial**, or **View Only** permissions.

Users with Full, Partial, and View Only permissions can view invoices in EPC. Invoices can only be created by users with Full or Partial permissions. **Only users with Full permissions can sign and certify an invoice or sign and return a service certification**. Users with Partial permissions who create an invoice must send it to a Full-rights user to be certified.

Users with Partial or View Only permissions can view invoice-related outreach under the **Communication** tab in EPC but **only users with Full permissions can respond to outreach**.

Work with your Account Administrator to request changes to your user permissions. If you are not sure who to contact:

- Applicants can use the [E-Rate Entity Search Tool](#) to locate the EPC Account Administrator information for their organization.
- Service providers can search the [Service Provider Download Tool](#) using their company name or Service Provider Identification Number (SPIN) to download the results and identify the EPC Account Administrator.

Ensure you have at least one Full rights user for each BEN or SPIN. Two is ideal, so you will not have any issues during invoice submission, form certification, or outreach response.

2024 Training and Outreach

USAC is coming to an event near you in 2024. Below are some events we will attend in the next few months. Visit the [In-Person E-Rate Training Events](#) page to learn more about the events we'll be attending where we can answer your E-Rate questions.

Webinars

- **Beginning E-Rate Services Webinar** on **June 20, 2024 from 2 p.m. to 3 p.m. Eastern Time** (ET). This session gives applicants and service providers a high-level overview of the next steps in the E-Rate process, after equipment and services are funded. [Register](#).

Conferences

- Visit USAC at the **American Library Association (ALA) Annual Conference June 27-July 2, 2024** in San Diego. [Event Link](#).
- Visit USAC at the **Southeastern Library Association (SELA) Annual Conference July 14-16, 2024** in Huntsville, Alabama. [Event Link](#).

2024 In-Person Training

E-Rate experts will provide training and discuss program updates. There will be time at the end of the sessions for USAC to answer questions from both new and experienced participants. Each session will cover the E-Rate program lifecycle beginning with the opening of the EPC Administrative Window, running a competitive bidding process, applying for funding, and invoicing for approved equipment and services.

Registration **opened on April 23 at 3 p.m. Eastern Time** (ET). Register for a training by selecting a link below.

- **E-Rate Training**: September 17, 2024 from 9:30 a.m. to 5:30 p.m. Central Time in **Dallas, Texas**. [Register](#).
- **E-Rate Training**: October 7, 2024 from 9 a.m. to 4 p.m. Eastern Time in **Washington, D.C.** [Register](#).
- **E-Rate Training**: October 29, 2024 from 9:30 a.m. to 5:30 p.m. Central Time in **Fayetteville, Arkansas**. [Register](#).
- **Tribal-Focused E-Rate Training**: November 12, 2024 in Palm Springs, California. This Tribal-focused training will be held in conjunction with the Association of Tribal Archives, Libraries, &

Museums' (ATALM) annual conference. To attend the E-Rate program training, you must be registered for the conference. [Event link](#).