Program Integrity Assurance (PIA)

E-Rate Program Participant Webinar

March 26, 2026

Universal Service
Administrative Co.

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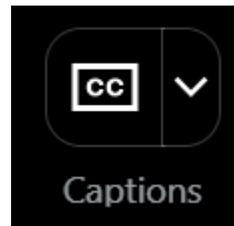
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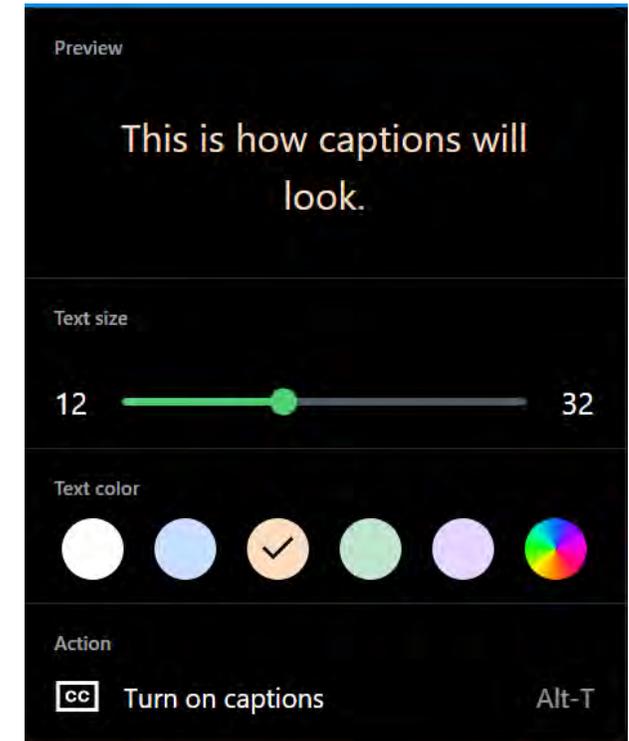
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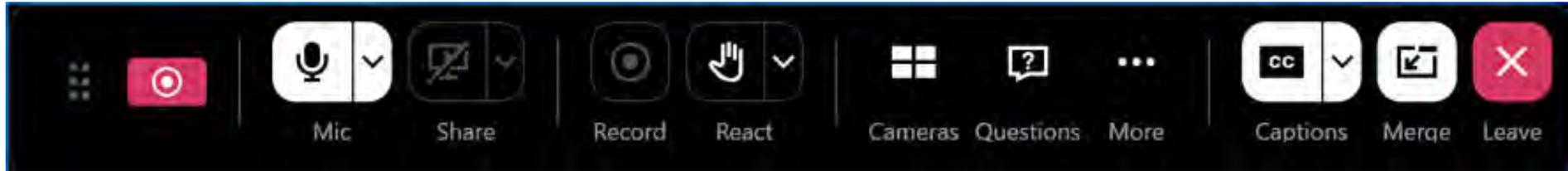
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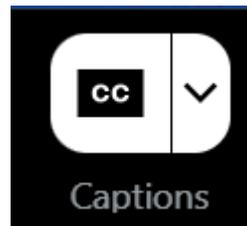
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Captions OFF

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Housekeeping – Audio

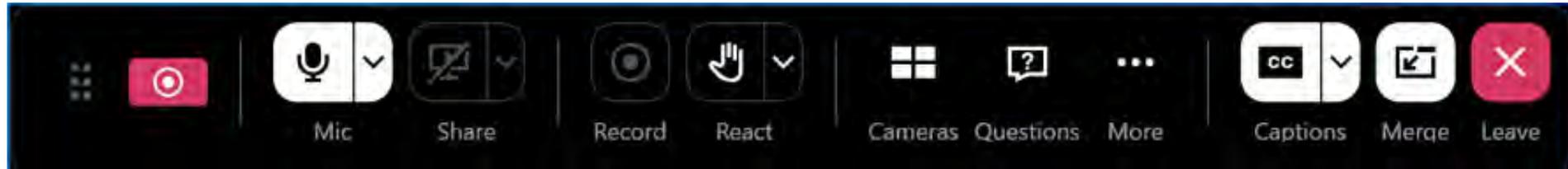- **Audio is available through <u>your</u> computer's speakers**

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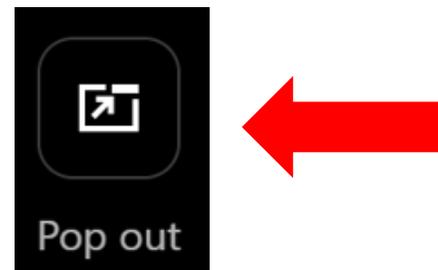
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Lisette LaForge

Associate Manager | E-Rate

Nekose Wills

Senior Communications Specialist | E-Rate

Agenda

- Funding Year 2026 Program Updates and Reminders

- What Is Program Integrity Assurance (PIA)?

- FCC Form 471 Review Process

- Preparing for a PIA Review

- PIA Inquiries

- Funding Commitment Decision Letters

- Q&A

Funding Year 2026
Program Updates and Reminders

Key Dates

- **Wednesday, March 4, 2026,** was the last date that applicants could file and certify the FCC Form 470 and still wait the required minimum 28-day period.

- The Funding Year (FY) 2026 FCC Form 471 application filing window opened on Wednesday, January 21, 2026, at noon ET and **will close on Wednesday, April 1, 2026**, at 11:59 p.m. ET.

FY2026 Eligible Services List (ESL)

- The FCC's Wireline Competition Bureau (WCB) released the FY2026 eligible services list (ESL) Order (DA 25-1069) on December 17, 2025.
  - Amended the entries for "**Eligible Broadband Internal Connections**" to include software-based services including bug fixes, security patches, software-based technical assistance, and configuration changes.
  - Amended the bullets listed under "**Basic Maintenance of Eligible Broadband Internal Connections**" to limit configuration changes to those performed in person and deleted "Basic technical support including online and telephone-based technical support" and "Software upgrades and patches including bug fixes and security patches."
  - Amended the language in "**eligibility limitations for basic maintenance**" to delete language related to bug fixes, security patches, and technical support.
  - Software-based services like vital bug-fixes and security updates and remote-based services like configuration changes will no longer need to be amortized across multiple funding years despite being entirely paid for by applicants in the first year of the multi-year license agreement.
  - Permit applicants to seek support for all software- and other remote-based services associated with equipment on their FCC Form 471 applications if they either sought bids for both equipment and software, or they sought bids only for equipment on the FCC Form 470, but the bid response includes both the equipment and software- or remote-based services.
    - Applicants seeking support for software- or remote-based services as internal connections in FY 2026 for services that were competitively bid as BMIC services are not violating the competitive bidding rules for this funding year.
    - USAC is directed to apply this decision to new FY 2026 funding requests and pending appeals after the effective date of this Order.
- For more information, please review the FY2026 ESL on the Eligible Services List webpage.

ESL (Continued) and FCC Form 471 Updates

- Bus Wi-Fi and Wi-Fi Hotspots and services are not eligible for FY2026 ([FCC 25-62](#)).

  - The [FCC Form 470 Services Guiding Statements Table (FY2025-FY2026)](#) has been updated to reflect that Bus Wi-Fi and Wi-Fi Hotspot and services are not eligible in FY2026. The FCC Form 470 will be updated for FY2027.

- Beginning in FY2026, applicants will select the invoice method (FCC Form 472 (BEAR) or 474 (SPI)) for each FRN when submitting their FCC Form 471. The [FCC Form 471 eLearningModule (eLM) & User Guide](#) has been updated to reflect these changes to the FCC Form 471.

  - Applicants can change the mode, with documentation of agreement from their service provider, through the RAL process after submitting their FCC Form 471 and before the FCDL is issued. Future EPC changes will be rolled out to allow applicants to change the invoicing mode through the FCC Form 500.

FY2026–FY2030 Category Two (C2) Budget Management

FY2026 is the first year of the FY2026-FY2030 C2 funding cycle.

- Unused funds from the FY2021-FY2025 C2-budget will not roll over.

- To get a forecasted estimate of the C2 budget, use the [E-Rate C2 Budget Tool FY2021+](). The tool provides data on the C2 budget cycles. It is available on the [Tools]() page along with a [video]() on how to use the tool and a [glossary of terms]().

- **Applicants will be required to validate their student counts or library square footage in the first year they apply for C2 support during the FY2026-FY2030 cycle.**

- For more information, please visit our [Category Two Budgets]()webpage and our [Category Two Budget Management Guide]().

SAM.gov Unique Entity Identifier (UEI) Requirement

- Beginning August 2026, USAC will begin using SAM.gov banking information to remit payment for all Universal Service Fund (USF) invoices and requests for reimbursement.

- **All service providers** and **all E-Rate participants that use the BEAR invoicing method to receive USF disbursements** must have a Unique Entity Identifier (UEI) on their FCC Form 498, an active SAM.gov account, **and** must have a valid bank account associated with the SAM.gov account.

- Service providers and E-Rate participants who receive funding from USAC should confirm that their FCC Form 498 includes a UEI and active SAM.gov account and that it is connected to the correct bank account—specifically, the bank account that is designated to accept USF disbursements. To prepare for this change, USAC will contact service providers and E-Rate applicants by email to ensure they met these requirements.

- Service providers and E-Rate applicants that do not have an UEI, and those that only have a SAM.gov generated UEI but not an active SAM.gov account connected with a bank account, must visit SAM.gov and complete the registration process. **This process can take up to six weeks, so USAC recommends starting as soon as possible.**

- Service providers and BEAR applicants will have to annually register with SAM.gov to keep their account active. USAC will not be able to process disbursements if the payee's SAM.gov account is inactive.

- For more information, visit USAC's SAM.gov UEI Requirement webpage.

Initial PIA Knowledge Checks

What Is PIA?

- After you file and certify an FCC Form 471 within the filing window, Program Integrity Assurance (PIA) reviewers at USAC check the information on your form for completeness and accuracy and may have additional questions for you to answer.

- Applications go through an initial review and a final review, which may involve questions from PIA reviewers on one or more of the following topics:

  - Eligibility of the entities receiving service;

  - Eligibility of the equipment/services requested;

  - Discount calculations;

  - Contracts; and

  - The competitive bidding process.

FCC Form 471 Review Process

Program Integrity Assurance (PIA) Review

- After applicants submit an FCC Form 471 during the filing window, PIA reviewers review the form to ensure it is complete and accurate.
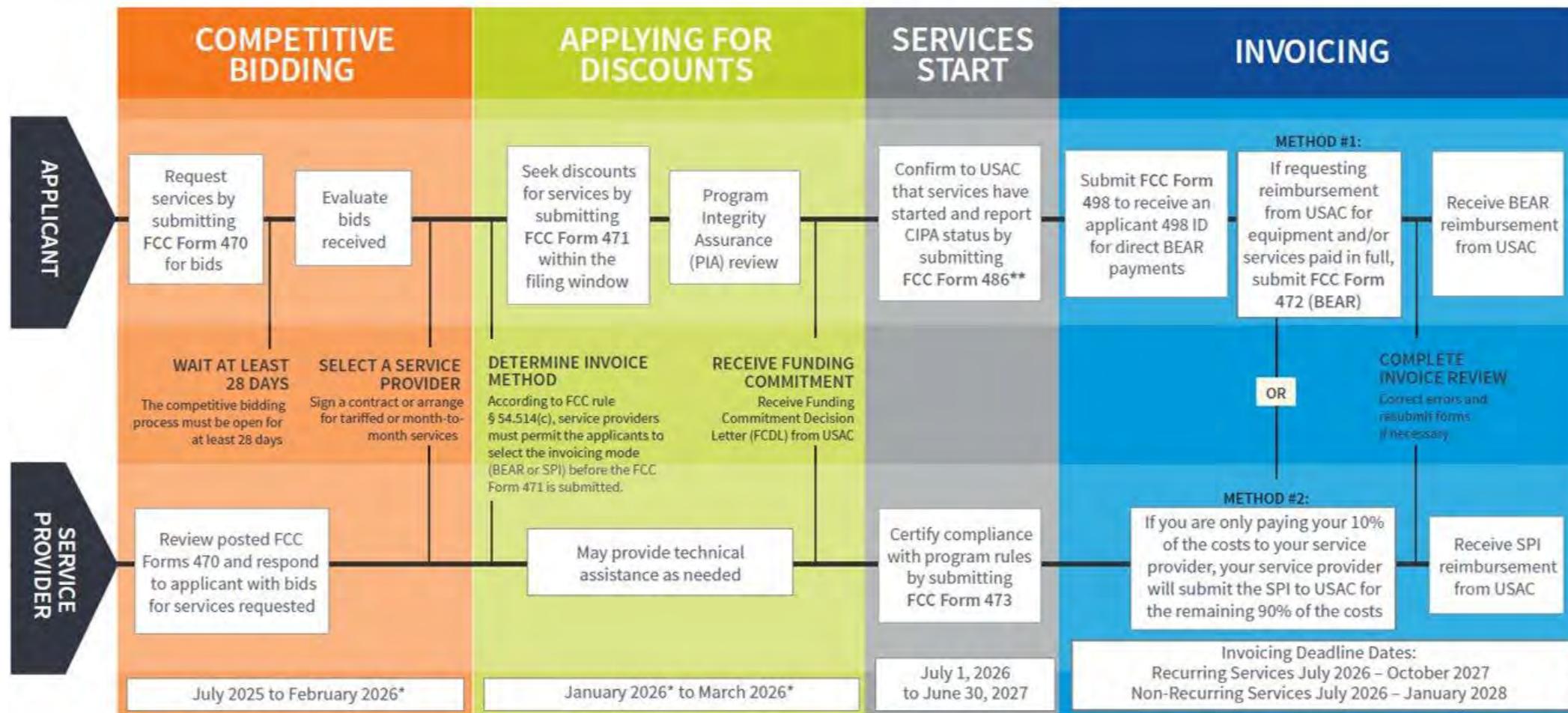
*Date ranges reflect a typical timeline and are subject to change

E-Rate Forms

Service Provider FCC Forms

498	**473**	**474**
Service Provider ID Number	Service Provider Annual Certification	Service Provider Invoice

Obtain a SPIN ➔ Certify Compliance ➔ Invoice USAC

Applicant FCC Forms

| **470**	**471**	**486**	**472**
Requesting Services	Applying for Discounts	Starting Services	Billed Entity Application Reimbursement

Know Your Role in the PIA Process and Beyond

- **Applicants**
  - Determine services needed, file FCC Form 470 (and RFP, if needed/necessary);
  - Run competitive bidding process;
  - Select the most cost-effective bid using price as the primary factor;
  - File FCC Form 471 requesting support;
  - **Respond** to PIA requests;
  - **File** other applicant forms (FCC Forms 486, 472, 500, etc.); and
  - **Retain** documentation for at least **10 years** from the last date of service delivery.

Know Your Role in the PIA Process and Beyond (Cont.)

- **Service providers**
  - **Respond** to FCC Form 470 and RFPs;
  - **May assist** applicant
    - with FCC Form 471 after being selected as the vendor; and
    - with responding to PIA requests on technical services questions (but not about competitive bidding);
  - **File** service provider forms (FCC Forms 473, 474, etc.);
  - **Retain** documentation for at least **10 years** from the last date of service delivery.
  - **Contribute** to the Universal Service Fund (if applicable).
    - See Service Provider page of the USAC website.

RAL Modification Request

- After certifying your FCC Form 471, double-check your application for accuracy while you wait for your PIA review.

- Correct any inaccurate or out-of-date information by submitting a [Receipt Acknowledgment Letter (RAL) Modification Request](#).

  - Within the FCC Form 471 record, navigate to **Related Actions**.

  - Select **Submit Modification Request (RAL)**.

  - Fill out the required information.

- You can file a RAL Modification Request to update other information in advance of and during the PIA Review.

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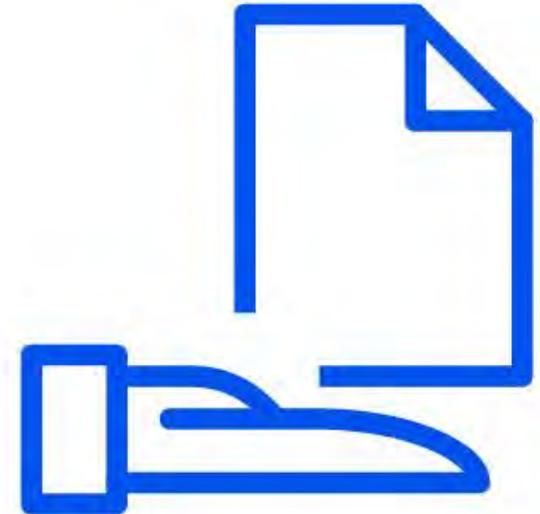
FCC Form 471 Status While Under Review

- Your form's status in EPC will change as it progresses through the review process.

- Your application may revert to a previous status because this process involves multiple levels of review.

Review Status Bar

Incomplete	Certified	In Review	Outreach	Wave Ready	Committed

Pending Inquiries Status Bar

Summary   Funding Requests   **Review Inquiries**   Deferral History   Discount Calculation   Entity Information   News   Related Actions

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date ↓	Due Date	Extn(s) Approved	Status	Extn Requests

Monitor for PIA Review

- The contact person identified on the FCC Form 471 should:
    - Regularly monitor their email address;
    - Regularly check their EPC account for PIA review questions; and
    - Respond to any questions promptly.
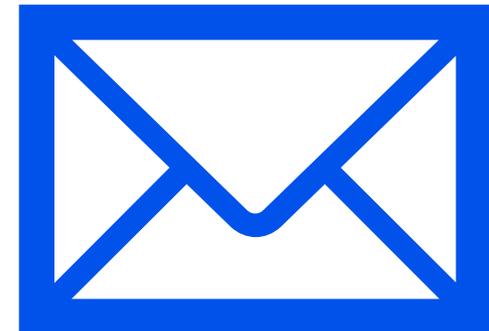
Preparing for a PIA Review

Frequently Reviewed PIA Items

- Your PIA reviewer may contact you to verify:

  - [Eligibility of one or more of your entities (e.g., schools, libraries or NIFs)](#);

  - [Eligibility of the requested equipment and/or services and their category of service](#);

  - Compliance with program rules; and

  - Tribal affiliation (if applicable).

- Common PIA requests for supporting documentation include:

  - Documents to validate entity information (e.g., surveys for alternative discount calculations, discount rates, student counts, eligibility); and

  - Service provider documents such as contracts, bills, and vendor quotes.

- PIA reviewers may also request information or other documents to help clarify FCC Form 471 entries and information.

FCC Form 471 Modifications

- As part of the review process, PIA reviewers may be required to modify information on your funding request.

  - For example, PIA reviewers may change student count or service type based on the information provided.

- If a PIA reviewer discovers ineligible equipment and/or services in a funding request, applicants can choose to either remove the ineligible item(s) or create a separate funding request.

FCC Form 471 Modifications (Continued)

- PIA reviewers will alert you if they modify information on your funding request.
  - You will receive an email notification.
  - You will also receive an EPC notification.

Retain Documentation

- **Applicants and service providers** must [retain all documentation](#) for 10 years after the last day of the applicable funding year or the service delivery deadline for the funding request, whichever date comes later.

  - For example, for recurring internet access service for FY2026, both the applicant and the service provider must retain all records until at least June 30, 2037.

- Winning service providers must retain records related to the purchase and delivery of E-Rate eligible equipment, signed and executed contracts, bidding information, invoices, provision of services, and other matters relating to equipment and services.

- Records can be kept electronically.

  - Use file names and folder names that are specific and descriptive to help you locate them more easily.

Organize Documentation

- Save and organize copies of all documentation such as:
  - Competitive bidding documentation;
  - Contracts;
  - Network diagrams;
  - Discount documentation:
    - National School Lunch Program (NSLP) documentation; and
    - Community Eligibility Program (CEP) documentation.

- Use the E-Rate Program Applicant Document Retention List as a guide.

Knowledge Check

PIA Inquiries

Responding to PIA Inquiries

- To avoid delays, provide:
  - Complete responses to all questions; and
  - All requested documentation.

- Who can respond to PIA inquiries?
  - Applicants or authorized representatives of applicants.
  - Service providers **can assist** applicants with PIA inquiries about the equipment/services being provided.

- Contact your reviewer with questions.

PIA Inquiries in Your EPC News Feed

- You will be notified via email and your EPC News Feed if a PIA reviewer requests additional information.

- The News Feed item labeled "From the FCC Form 471 Review Team" includes:
    - Today's date;
    - Response due date;
    - Contact name;
    - BEN Name;
    - FCC Form 471 application number;
    - A title for each inquiry;
    - Your PIA reviewer's name and telephone number; and
    - A hyperlink to your application (the gray bar at the bottom of the notification).

TIP: Find notifications by searching "471 Review Team" in your EPC News Feed.

To Access PIA Inquiries in EPC

- To view your PIA inquiries within the FCC Form 471 record:
  - Navigate to **Review Inquiries**;
  - Select **Respond to Inquiries**; and
  - Click on the blue hyperlink under **Name** to access the questions.
    - Remember to read the information under **Outreach Type**.

- Requests for documentation.
  - Select the **Submit** button after uploading documents.

PIA Inquiry Status

- The dashboard lists the status of the PIA outreach.
  - "Pending" inquiries are questions submitted by PIA to the contact person.
  - "Submitted" inquiries are responses you submitted to PIA.

Responding to PIA Inquiries

- You have **15 days** to respond to PIA inquiries.

- You may ask for a **one-time**, **seven-day extension**, which is **automatically granted**.

- Any additional extensions are considered on a case-by-case basis.
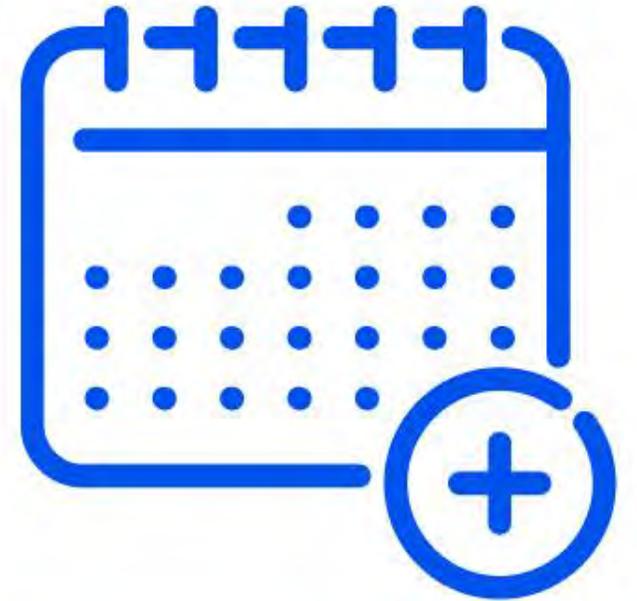
Requesting Additional Time

To request an extension for your response:

1. Navigate to the FCC Form 471 in EPC;

2. Choose **Review Inquiries**; and

3. Select **Request Extension**.

Tips for Responding to Inquiries

- Complete **all** fields, entering "N/A" when not applicable.

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

- If you encounter an "incomplete" warning:

  - Answer the questions again and verify that all fields are populated.

  - If these warnings persist, open a customer service case through EPC or by calling (888) 203-8100.

Tips for Responding to Inquiries (Continued)

- To address identical questions for an entity across multiple applications:
  - Provide the response on the first application.
  - For subsequent inquiries, direct the reviewer to the first application containing the response.

Common FCC Form 471 Application Errors

Problem	Tips to prevent the problem
Incorrectly classifying the category of service or equipment/service type on the FCC Form 470	• Determine the equipment/services you need and contact the CSC to verify correct classification of equipment and/or services. • Competitively bid for all necessary equipment and/or service types by filing an FCC Form 470 that accurately describes the equipment and service(s) being requested.
Filing an inaccurate FRN with the wrong equipment/service type	• Work with your service provider to ensure that equipment and/or services are accurately represented on the FCC Form 471. • Contact the CSC or your PIA reviewer with any questions.
Failing to remove ineligible services/equipment	• Work with your service provider to determine whether your requested equipment and/or services are 100 percent eligible. • Remove any ineligible amounts when creating your FRN(s).

PIA Verification of Mixed Eligibility

- Equipment and/or services may be **fully**, **partially** or **conditionally** eligible.

- Eligibility of equipment and/or services may vary from year to year based on the Eligible Services List.

- "Mixed eligibility" refers to products and services for which only a portion is eligible for discounts under the E-Rate program.

PIA Verification of Mixed Eligibility (Continued)

- In general, a cost allocation (separating the eligible and ineligible costs), is required if equipment and/or services:
  - Contain(s) both eligible and ineligible components.
    - Include in your bid what the eligible percentage is, if everything requested is not 100 percent eligible.
  - Is/are utilized for eligible and ineligible uses.
    - For example, a server that is used for both caching (eligible) and video distribution (ineligible).
  - Is/are delivered to both eligible and ineligible locations.
    - For example, broadband service delivered to a school run by a church (eligible) AND the church office (ineligible).

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PIA Verification of Mixed Eligibility (Continued)

- There is no single approved method to allocate eligible and ineligible costs.

- Your method must use tangible criteria that result in a reasonable allocation with supporting documentation showing a clear cost delineation.

- If 90 percent or more of an applicant's internet service is used for eligible purposes, there is a presumption that other on-campus ineligible purposes are ancillary and do not require cost allocation (e.g., ancillary use by ineligible pre-K children in an eligible building).

Funding Commitment Decision Letters

Funding Commitment Decision Letter (FCDL)

- When the PIA review is complete, applicants and service providers receive a **Funding Commitment Decision Letter (FCDL)** in their EPC News Feed that they should review carefully.

- The FCDL includes:

  - Approved funding amounts;

  - Modified or denied funding amounts along with the reason(s) for the changes; and

  - Next steps in the E-Rate process.

FCDL Terms Defined

- **Pre-Discount**: Total cost of the equipment and/or services before the E-Rate discount is applied.

- **Discount Amount**: Pre-Discount Amount *times* the discount rate.

- **Discounts and Invoicing Amounts**:

  - Total Eligible Charges *times* the discount rate equals the FRN committed amount on the FCDL.

  - The "Commitment Request" in EPC is the amount eligible for funding and payment through the E-Rate program and for payment during the invoicing process.

- **Non-Discount Amount**: Amount applicant pays for the equipment and/or services using **non-**E-Rate funds.

  - This <u>cannot</u> be paid or credited by the service provider.

After Receiving the FCDL

- After the FCDL is delivered, applicants can:
  - Discuss service details with their service provider(s).
  - File the FCC Form 486 once services have started.

- If applicants or service providers disagree with one or more of the decisions in the FCDL, they can appeal to USAC.
  - Appeals must be lodged within 60 days of the date of the letter.
  - Appeal decisions are delivered via **Revised Funding Commitment Decision Letters (RFCDLs)**.

File Service Provider Annual Certification (SPAC)

473

- Service providers file an FCC Form 473 (Service Provider Annual Certification (SPAC) Form) to certify that they will comply with Schools and Libraries (E-Rate) program rules and guidelines.

- **FCC Form 473 Rules**:

  - A new form must be on file for **every funding year** service providers participate in E-Rate.

  - The form is required for each Service Provider Identification Number (SPIN)/498 ID **every funding year** of participation.

  - Forms are filed in EPC.

  - Only full-rights EPC users can certify FCC Form 473.

  - **The form must be on file before USAC pays any invoice** (BEAR or SPI).

  - Use the **EPC service provider record** to review funding years for which the form was completed.

- For more information on the FCC Form 473/SPAC form, review Module 2 of the "Service Provider Course 1" e-Learning Module.

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Resources

- [E-Rate Service Provider Webinar](#)

- [E-Rate Fall Training: Pre-Commit Process](#)

- [Eligible Services List (ESL)](#)

- [Competitive Bidding Infographic](#)

- [Program Integrity](#)

Knowledge Check

Live Q&A

- Submit your questions about today's topics:
    - FCC Form 471 Review Process
    - Preparing for a PIA Review
    - PIA Inquiries
    - Funding Commitment Decision Letters
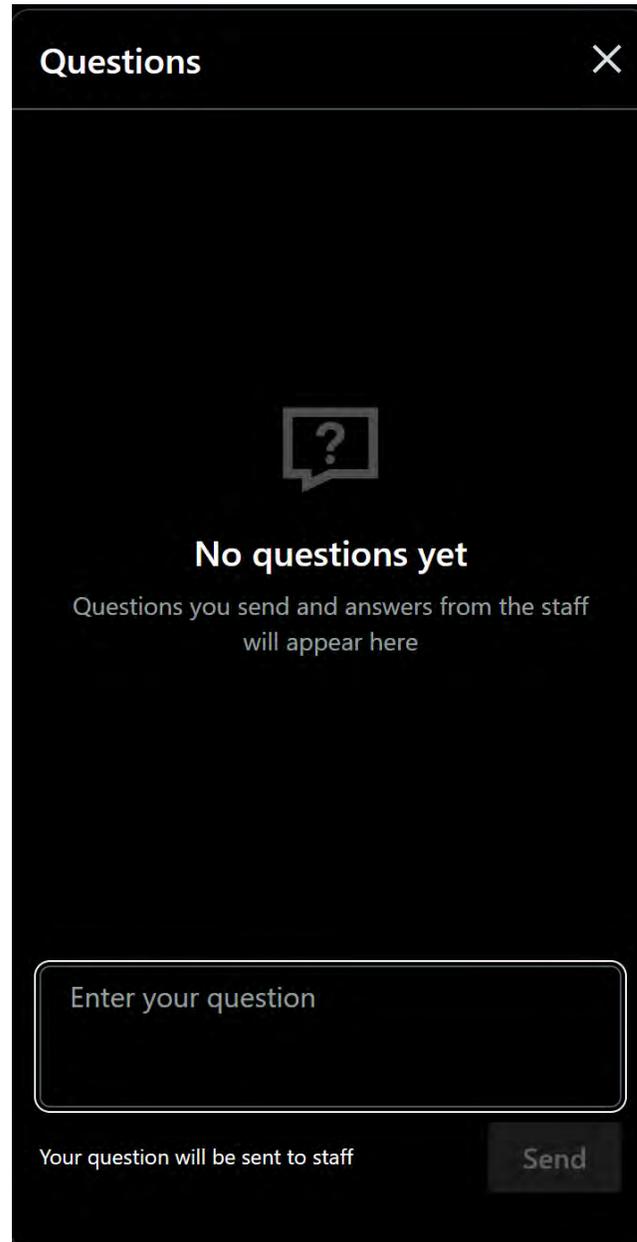
Questions ✕

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Enter your question

Your question will be sent to staff   Send

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✓ Type your queries into the "Questions" box in your webinar control panel.

✓ Write in full sentences.

✓ Ask one question at a time.

✓ Click the box to expand it and see all the written answers.

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Upcoming Webinars

- Our next webinar is on **March 31, 2026**.

- E-Rate Service Provider Webinar:
  - Recommended for service providers
  - Suitable for all E-Rate experience levels

- Please visit the E-Rate Webinars page for additional information.
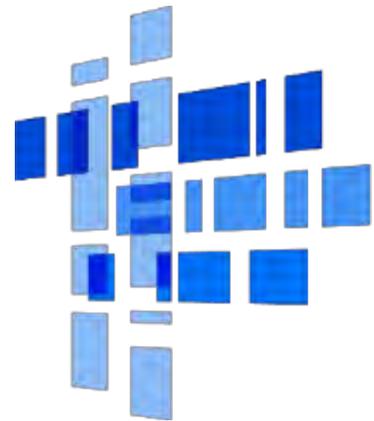
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- A survey will appear on your screen at the end of the webinar.

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- We appreciate your feedback!

Thank You!