

Supply Chain – Documentation for Auditors Checklist

General

Documentation to support general audit requirements

Documentation demonstrating that Universal Service Fund (USF) monies were not used to purchase, obtain, maintain, improve, modify, or otherwise support equipment or services produced or provided by covered companies. This includes:

- Master Vendor List applicable to USF funding (E-Rate, RHC, and High Cost filings) and related vendor review/approval process documentation
- Telecommunication asset listing
- USF expenditure details
- Details of transactions with providers of telecom equipment and services
- Bookkeeping and other financial records to verify the flow of USF funds and certain federal subsidies spent and received.

Network

Documentation to support compliance with the FCC's supply chain rules related to network expenditures

- For network and data centers, provide:
 - A list of locations, type (co-lo, private, etc.), size (number of equipment racks/sq ft.)
 - Architecture diagrams
 - Physical diagrams
 - Equipment inventory
- For network asset inventory documentation, provide:
 - Commercial and Government Entity (CAGE) codes
 - Original Equipment Manufacturer (OEM) numbers
 - Serial numbers
 - Radio frequency identification tags or unique identifiers
- Network/infrastructure equipment inventory
- Network monitoring and tool reports
- Network maintenance and service policies and plans
- Network procurement policies and lists of approved equipment

High Cost

Documentation to support the certification of the FCC Form 481

- Documentation supporting any internal review of compliance with the FCC's supply chain order and submission of the FCC Form 481 with the necessary supply chain certification language for the applicable funding year

- Written policies and procedures related to compliance with High Cost program requirements
- Company organizational chart, showing parent and affiliate relationships, as well as the individuals responsible for processing, reviewing, and approving data submitted in High Cost program filings
- Audit reports for financial, internal control, or any other audits that have a direct or indirect impact on data submitted in High Cost program filings
- Annual reports including audited financial statements and trial balances
- General Ledger (G/L), including account names and the identification of regulated and non-regulated accounts
- Expense sub-ledgers, including account names, amounts recorded, transaction descriptions, and vendor names for each expense transaction reported in Part 64 data
- Detailed list of affiliate/related-party transactions, including account names, amounts recorded, transaction descriptions, and vendor names for each affiliate/related-party transaction reported in Part 64 data (leases, contracts, management agreements, etc.)
- Continuing Property Records (CPRs)
- All supporting documentation related to all legacy and modernized High Cost program filings

E-Rate

Documentation to support the certification of the FCC Form 473

- Documentation supporting any internal review of compliance with the FCC's supply chain order for the submission of the FCC Form 473 with the supply chain certification language for the applicable funding year
- Lists of underlying bills that reconcile to the SPI/BEAR forms reimbursed by USAC for the applicable period
- General Ledger (G/L) account details for vendor payments related to the E-Rate program for the applicable year
- Internal policies and procedures for the E-Rate program for the applicable funding year
- Detailed inventory list of equipment provided to each E-Rate beneficiary for the applicable funding year
- Annual reports, including audited financial statements and trial balances (as well as any management letters and reports on Internal Controls Over Financial Reporting (ICOFR)) related to the E-Rate program for the applicable funding year

Rural Health Care (RHC)

Documentation to support the certification of the FCC Form 463

- Documentation supporting any internal review of compliance with the FCC's supply chain order and submission of the FCC Form 463 with the supply chain certification language for the applicable funding year



- Annual reports, including audited financial statements and trial balances (as well as any management letters and reports on Internal Controls Over Financial Reporting (ICOFR)) for the applicable funding year
- Lists of underlying bills that reconcile to the FCC Form 463/Invoice forms submitted to USAC for reimbursement for each RHC beneficiary for the applicable funding year
- Internal policies and procedures for the RHC program for the applicable funding year
- Detailed inventory lists of equipment provided to each RHC beneficiary for the applicable funding period
- Master vendor lists applicable to RHC and any related vendor review/approval process documentation