

E-rate Post-Commitment Process

2020 Applicant and Service Provider Training

November 6, 2020



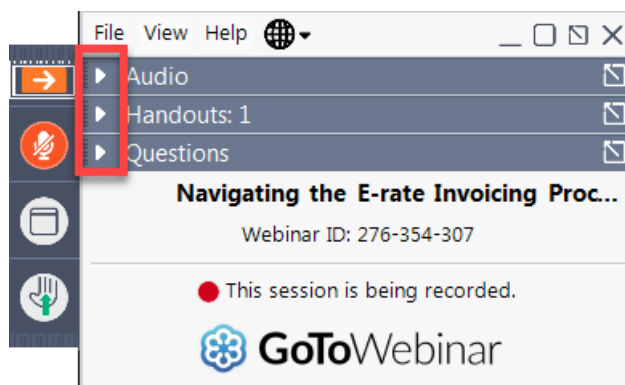
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HOUSEKEEPING – WEBINAR PANEL

- The webinar panel is located on the right-hand side of the screen.
- Open the panel by clicking the orange arrow.



- Use the white arrows to open the sections in the panel.

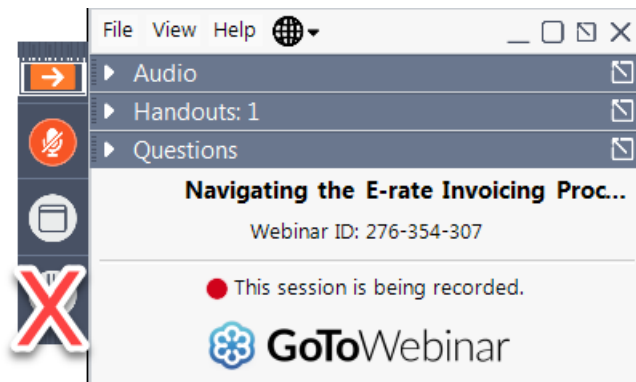


HOUSEKEEPING – WEBINAR PANEL

- You can use the panel to view the presentation in full screen or window mode.

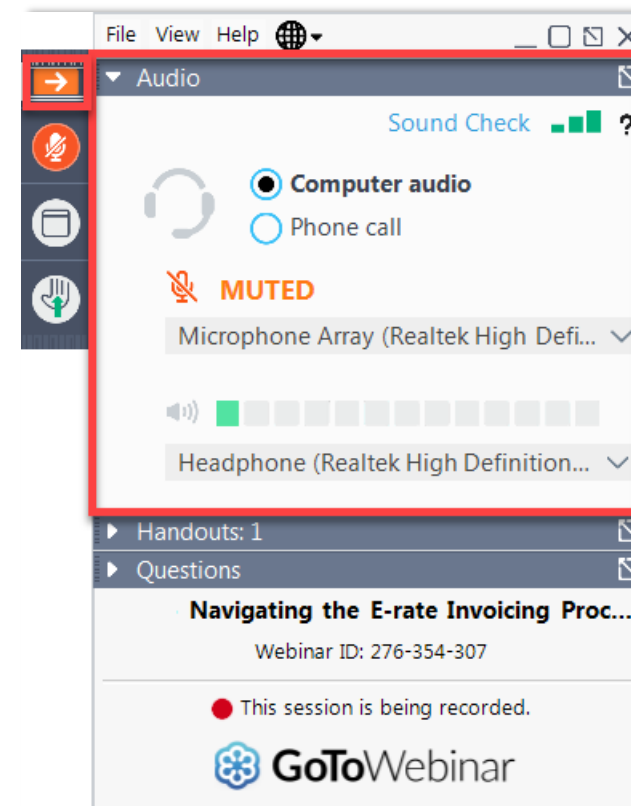


- We are not using the hand raise function.



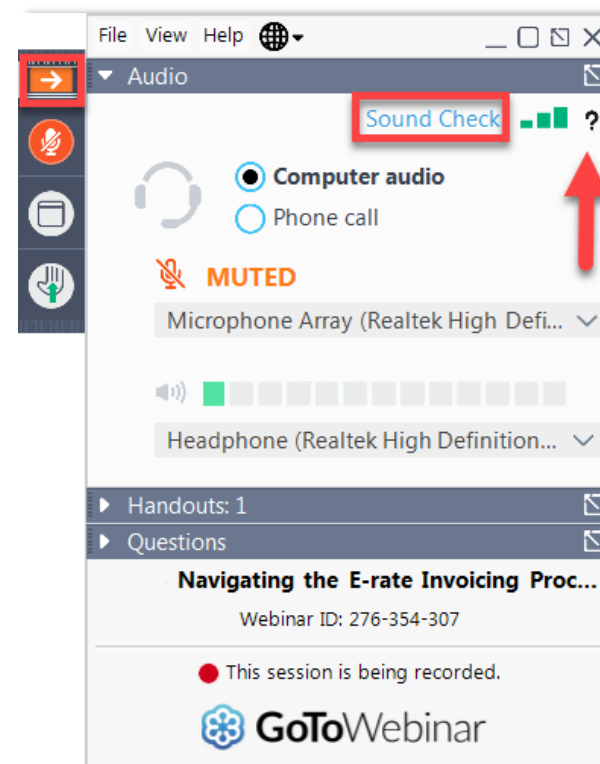
HOUSEKEEPING – AUDIO

- Use the “Audio” section of your control panel to select an audio source.
- Choose one of the audio options:
 - Your computer's audio
 - Call in using an access code and audio PIN.
- The audience will remain on mute.

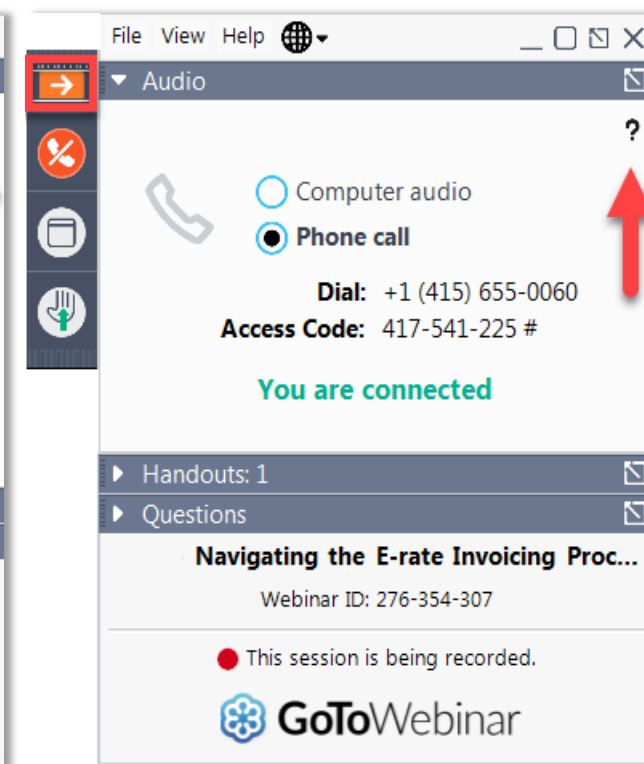


HOUSEKEEPING – TECHNICAL ISSUES

- Use the “Sound Check” link and click question mark icon for audio help.
- Exit webinar and click the [check system requirements](#) link in the event confirmation email to determine whether your computer meets the requirements to see and hear the webinar.
- If issues persist, call 833-851-8340 to [troubleshoot with GoToWebinar](#).



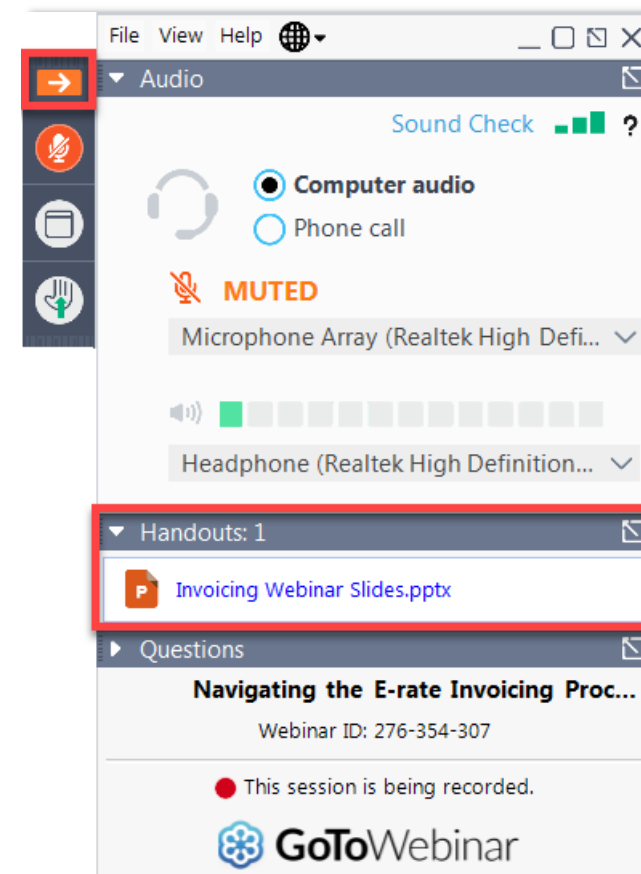
Computer Audio



Phone Call

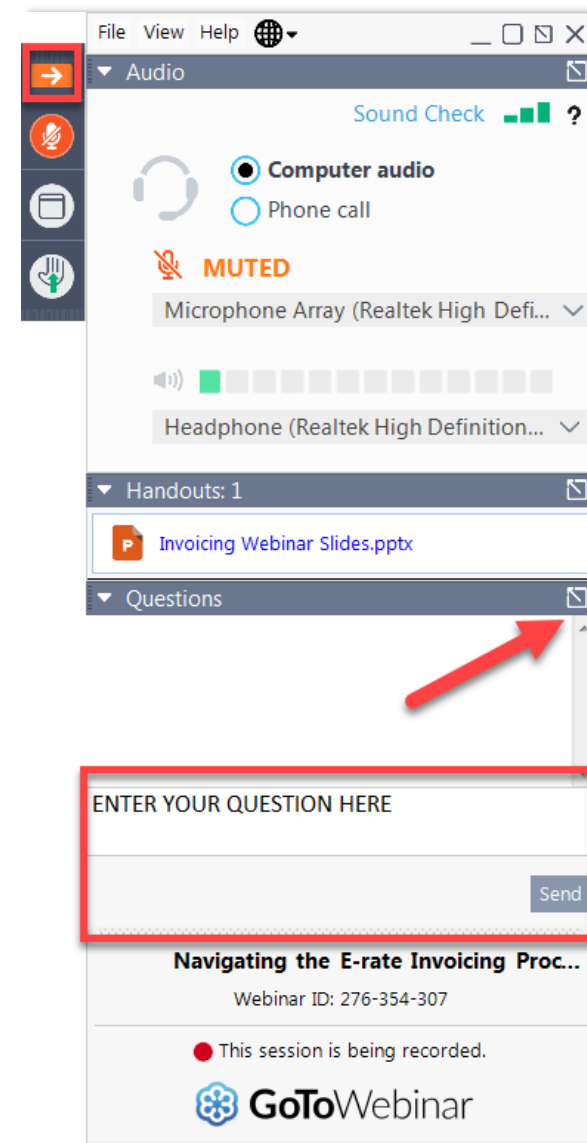
HOUSEKEEPING – RESOURCES

- The **slide deck** is available when you click the arrow to expand the “**Handouts**” tab.
- A recording of this webinar will be available after the event via the registration link.



HOUSEKEEPING – Q&A

- **There will be a live Q&A session focused on today's topics.**
- Tips for submitting questions:
 - Use the “Questions” box in your webinar control panel anytime during the presentation.
 - Click the box with the arrow above the questions box to expand it and see all written answers.
 - Write in full sentences.
 - Ask one question at a time.
 - Ask questions related to webinar content.



The screenshot displays the GoToWebinar control panel interface. At the top, there is a menu bar with 'File', 'View', 'Help', and a globe icon. Below this is the 'Audio' section, which includes a 'Sound Check' indicator and two radio buttons: 'Computer audio' (selected) and 'Phone call'. A 'MUTED' status is shown with a microphone icon and a slash. Below the audio settings are two dropdown menus for 'Microphone Array (Realtek High Defi...)' and 'Headphone (Realtek High Definition...)', each with a volume slider. The 'Handouts: 1' section shows a document icon and the file name 'Invoicing Webinar Slides.pptx'. The 'Questions' section is highlighted with a red box and a red arrow pointing to it. Below the 'Questions' section is a text input field with the placeholder text 'ENTER YOUR QUESTION HERE' and a 'Send' button. At the bottom of the control panel, the title 'Navigating the E-rate Invoicing Proc...' is displayed, along with the 'Webinar ID: 276-354-307' and a red dot indicating 'This session is being recorded.' The GoToWebinar logo is at the bottom.

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Create a customer service case in the E-rate Productivity Center (EPC):

1. Log in to EPC.
2. Select the **Contact Us** link from the upper right menu on your landing page.



MEET OUR TEAM



Devent Carter
Post-Commitment Advisor

E-rate Program



Nkeshi Free
Communications Specialist

E-rate Program

AGENDA

1. FCC Form 486 and Children's Internet Protection Act (CIPA)
2. Post-Commitment Notifications
3. Appeals
4. SPIN Changes
5. Service Substitutions
6. FCC Form 500

Children's Internet Protection Act (CIPA)



Children's Internet Protection Act (CIPA)

- Requires that schools and libraries enforce certain safety measures that protect against access by adults and minors to obscene content on the internet.
- Three requirements include:
 - Internet Safety Policy
 - Technology Protection Measure
 - Public Notice and Hearing or Meeting
- The school or library must maintain documentation demonstrating that they are working toward compliance (in the first year) or in compliance (second year and thereafter).

CIPA: Internet Safety Policy

- The Internet Safety Policy (ISP) must address:
 - Access by minors to inappropriate matter on the internet and World Wide Web;
 - The safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications;
 - Unauthorized access including "hacking" and other unlawful activities by minors online;
 - Unauthorized disclosure, use, and dissemination of personal information regarding minors; and
 - Measures designed to restrict minors' access to materials harmful to minors.

CIPA: Internet Safety Policy

- **Additional requirements for schools:**
 - Must also include monitoring the online activities of minors.
 - Must provide for educating minors about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, cyberbullying awareness, and response.

CIPA: Technology Protection Measure (Filter)

- A technology protection measure is a specific technology that blocks or filters internet access.
- Entities must enforce the operation of the technology protection measure during the use of its computers with internet access.
- A person authorized by the authority with responsibility for administration of the school or library may disable the technology protection measure during use by an adult to enable access for bona fide research or other lawful purpose.
- Decisions about what matter is inappropriate for minors are made by the local community (school board, local educational agency, library, or other authority).

CIPA: Public Notice and Hearing or Meeting

- You must provide **public notice** and hold at least **one public hearing or meeting** to address the internet safety policy.
- For private schools, public notice means notice to your constituent group.
- Additional meetings are not necessary – even if the policy is amended – unless those meetings are required by state or local rules or the policy itself.



CIPA: Documentation for ISP

- A copy of your internet safety policy, along with any updates to your policy.
- Documentation of the adoption of the policy – for example, approval in the minutes of the required hearing or meeting, or documented adoption by a school or library board.

CIPA: Documentation for Technology Protection Measure

- A description of the filter.
- A report or other documentation on the use of the filter. The documentation should show that the filter was installed and was working during the funding year. For example,
 - A school that purchased filtered internet access could archive a sampling of reports from the service provider of internet sites blocked, or bills from the service provider verifying that the filter was operational.
 - If a school purchased its own filter, it could archive logs produced by its IT staff showing the hours the filter was engaged.

CIPA: Documentation for Public Notice & Hearing

- Documentation that the school or library gave public notice and held a public hearing or meeting on the policy. For example:
 - A copy of a website announcement for a regular school or library board meeting open to the public where the policy will be discussed.
 - An advertisement in a local newspaper of a county government hearing or meeting where the policy appears as an agenda item.
 - A copy of the minutes of the hearing or meeting and the date it occurred.

FCC Form 486



FCC Form 486

Applicants file the FCC Form 486 to:

- Notify USAC that **services have started** for the Funding Request Numbers (FRNs) listed on the FCC Form 471.
- Report the status of compliance of the entities on those FRNs with the **Children's Internet Protection Act (CIPA)**.

FCC Form 486: Service Start Date

- What is my Service Start Date (SSD)?
 - The first day of the funding year if services start on or before July 1.
 - Any day after July 1, but before June 30 of the funding year that services were actually started. For example:
 - For installations that started on May 25 before the funding year, the SSD is July 1 of the funding year.
 - For services starting August 7 of the funding year, the SSD is August 7 of the funding year.

When Do I File the FCC Form 486?

- The FCC Form 486 MUST be certified no later than 120 days after the **Service Start Date reported on the FCC Form 486** or 120 days after the date of the **Funding Commitment Decision Letter (FCDL)**, whichever is later.

What If I File the FCC Form 486 Late?

- If you miss this deadline, USAC will adjust your service start date to a date 120 days before the date you certified your form, and your funding commitment may be reduced to reflect the reduction in service time.
- If you wish to appeal a USAC decision adjusting your service start date based on a late FCC Form 486, you must first file the appeal with USAC and not the FCC.

FCC Form 486 Notifications

- After submitting the FCC Form 486, you and your service provider will receive two notifications.
 - The first notification confirms the form was certified.
 - The second notification is your FCC Form 486 Notification Letter, indicating that your form completed review and informing you of the decision.
- After USAC has approved your FCC Form 486 and services have started, you or your service provider may begin invoicing USAC for the discount amount of the costs of the approved products or services.

FCC Forms 486 Urgent Reminder Notification

- An urgent reminder letter is issued to applicants that appear to have missed the deadline to certify based on the service start date reported on the FCC Form 471.
 - The letter is delivered in the EPC News Feed.
 - Applicants have 15 days from the date of the letter to submit and certify the FCC Form 486 without penalty (if the service start date reported on the FCC Form 471 was the actual service start date).

Post-Commitment Notifications

Post-Commitment Notifications

- For Funding Year (FY) 2016 and forward, all post-commitment decisions are communicated through the Revised Funding Commitment Decision Letter (RFCDL) in EPC:
 - Appeals
 - SPIN changes
 - Service substitutions
 - FCC Forms 500
- For FY2015 and previous funding years:
 - Paper letters for appeal decisions and FCC Forms 500.
 - Email notifications for SPIN changes and service substitutions.

Appeals



What Is an Appeal?

- An appeal is a request for review filed by a program participant who disagrees with a USAC decision.
- Program participants – applicants or service providers – can appeal a USAC decision.
- Appeals are filed in EPC.

What to Include in Your Appeal

- Applicant (Billed Entity Number) or service provider (SPIN)
- Contact information including name, address, telephone number, and email address of the person who can discuss the appeal with USAC in detail
- Nickname for the appeal (to help you identify the appeal)
- Funding year for the decision of the appeal
- Funding Request Numbers (FRNs) associated with the appeal
- The USAC decision that is being appealed

What to Include in Your Appeal

- A narrative that explains precisely what relief is being sought
- Documentation of USAC's decision (e.g., a copy of USAC's decision letter)
- Supporting documentation such as forms and previous correspondence.
- If the program participant fails to submit the missing information to USAC within the time prescribed, USAC will review the appeal with the information on file, which may result in the denial of the appeal.

Granting Appeals

- Appeals may be granted under the following limited circumstances:
 - When the appeal makes clear that USAC made an error in its initial review (for example, the PIA reviewer made an error).
 - When the filer provides USAC with new information and/or documentation it did not provide when the original request was made.
 - When USAC receives policy clarification or a new policy impacts the original decision.
- If you are seeking a waiver of an FCC rule, you must file a waiver with the FCC.
 - For example, requests to consider FCC Forms 471 filed after the window close must be directed to FCC as a window waiver request.

Appeals Notifications

- After filing an appeal, you will receive an Appeal Confirmation Letter.
- If an appeal reviewer has questions, they will reach out through EPC.
- USAC issues its appeal decision in a Revised Funding Commitment Decision Letter (RFCDL).
- If the applicant or service provider does not agree with the USAC decision in the RFCDL, they can file an appeal with the FCC.

SPIN Changes



SPIN Changes

- A SPIN change is a change to the Service Provider Identification Number (SPIN) on record for one or more funding requests.
- There are two types of SPIN changes:
 - A **Corrective SPIN change** generally does not change the service provider, but corrects a data entry error or reflects a merger or acquisition.
 - An **Operational SPIN change** is a change to the service provider made by the applicant. Some restrictions apply.

Corrective SPIN Changes

- Corrective SPIN changes can be requested because of:
 - Data entry errors
 - Mergers and acquisitions
 - Other changes not initiated by the applicant
- When to file:
 - File your request on or before the last date to invoice.
 - Service providers can initiate these requests due to a merger, acquisition, or consolidation as long as the change affects all of their funding requests.
 - Corrective SPIN changes can also be made before commitment by filing a RAL modification or notifying your PIA reviewer.

Operational SPIN Changes

- Operational SPIN changes can be requested under the following conditions:
 - They are allowable under state and local procurement rules.
 - They are allowable under the terms of the contract between the applicant and the original service provider.
 - You have notified the original service provider of your intent to change.
 - The reason to change is recognized by the rules as legitimate (e.g., breach of contract, unable to provide service, but NOT simply lower price) (FY2011 and forward only).
 - The new service provider must be the runner-up in your original bid evaluation (FY2011 and forward only).
- When to file:
 - File your request after your FCDL is issued and on or before the last date to invoice.

Service Substitutions



Service Substitutions

- Service substitutions are changes to the specific products and/or services approved on the FCDL.
- The substituted products and/or services:
 - Must have the same functionality as the products and services approved on the original request.
 - Must not violate any contract provisions or state or local procurement laws.
 - Must not result in an increase in the percentage of ineligible services or functions.
 - Must be within the scope of the establishing FCC Form 470, including any RFP documents, for the original products and/or services.

Service Substitutions (Continued)

- When to file:
 - In general, after you receive the RAL and on or before the last day to receive service.
 - Service providers can file a “global” service substitution request to replace one product or service with another across all funding requests, usually because the product or service is being discontinued.

FCC Form 500



FCC Form 500: Adjusting Approved Funding

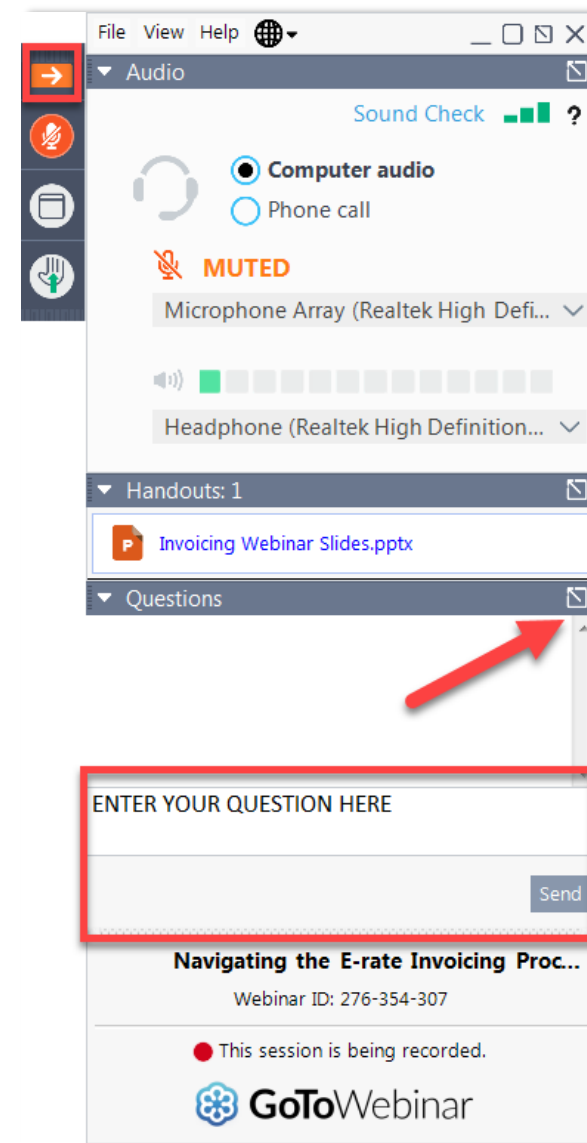
- Requests specific changes to your funding commitments after USAC issues your FCDL, such as:
 - Extending the contract expiration date listed on FCC Form 471.
 - Changing the service start date listed on FCC Form 486.
 - Cancellation or reduction of a Funding Request Number (FRN).
 - Requesting an extension of the deadline for delivery of non-recurring services.
- FCC Form 500 for Category Two funding reductions
 - If you do not use all of the Category Two funding commitment, you can submit FCC Form 500 to return funds committed but not invoiced to your five-year Category Two budget.

FCC Form 500: Adjusting Approved Funding (Continued)

- FCC Form 500 for FY2016 and forward:
 - File and certify in EPC.
- FCC Form 500 for FY2015 and previous funding years:
 - Complete the FCC Form 500 on paper.
 - Scan the paper form.
 - Create an FCC Form 500 in EPC and indicate that you are filing for a funding year before FY2016.
 - Attach your scanned form to the EPC “Legacy FCC Form 500” and certify it.
 - NOTE: If you do not use all of a Category Two funding commitment, file an FCC Form 500 to return committed funds and attach a spreadsheet with a detailed allocation for all of your affected entities.

HOUSEKEEPING – Q&A

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Q&A SESSION

SUBMIT YOUR QUESTIONS DURING THE LIVE WEBINAR

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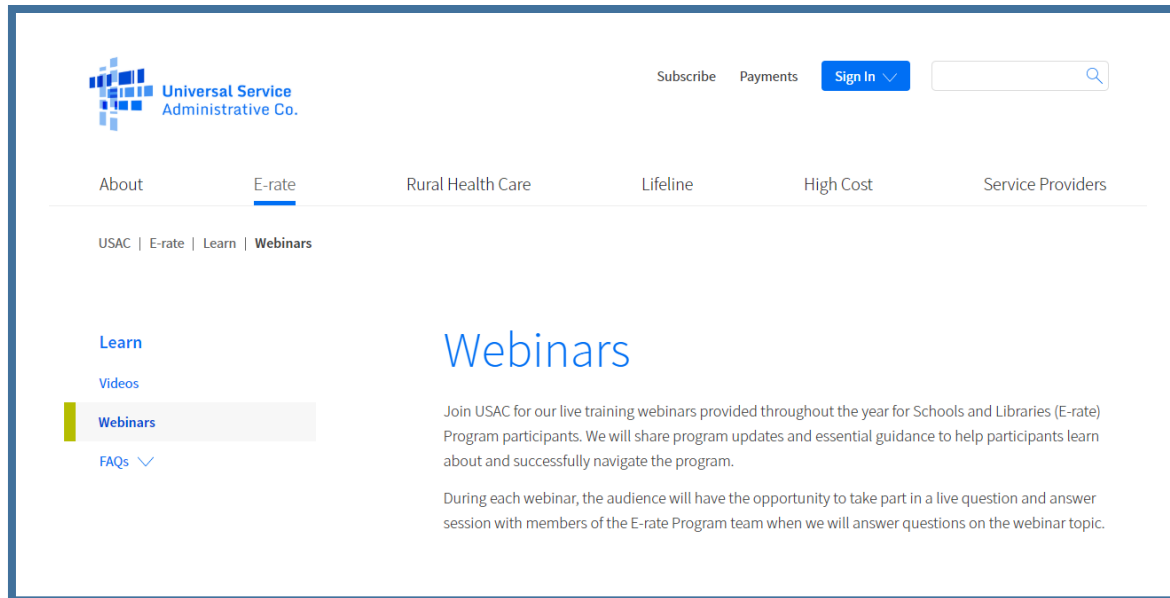
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UPCOMING WEBINARS

Go to the E-rate [Webinars](#) page for additional information.



Our next webinar is:
November 6 at 1:00 p.m. EST

EPC Administrative Window

Recommended for: Applicants and Service Providers
E-rate Experience Level: All levels

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Please fill out the pop-up survey after the webinar ends or use the link emailed to you after the event.

Webinar Survey

1. Are you an applicant, a service provider, or a consultant?

- Applicant
- Service provider
- Consultant
- Other

2. Please rate your overall webinar experience.

- Excellent
- Good
- Fair
- Poor

3. The content of the webinar was (select all that apply):

- What I expected when I signed up
- Relevant and useful to my work
- New information for me
- Easy to understand
- Other

Thank You!



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