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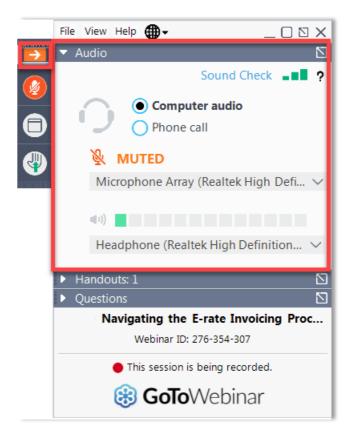


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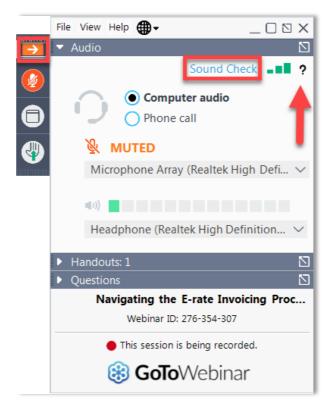
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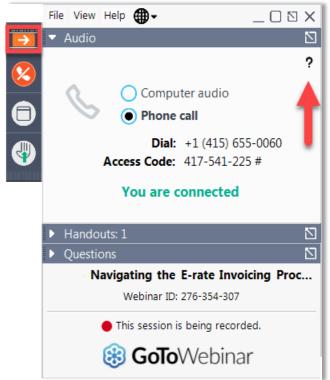
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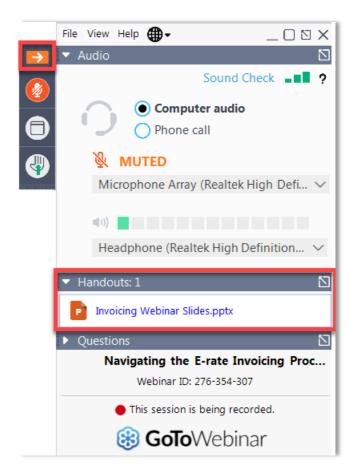
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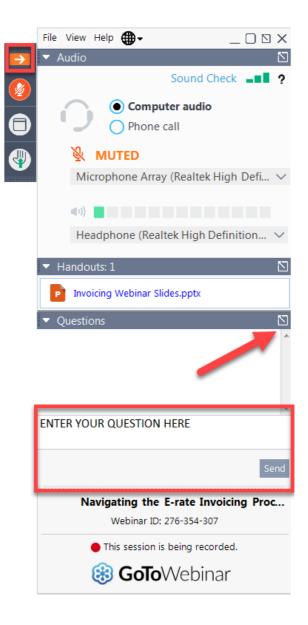
### **Housekeeping - Resources**

- 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.
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  - 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.



### **Customer Service Center (CSC)**



Call us at (888) 203-8100

Monday – Friday 8 a.m. to 8 p.m. ET



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 THE TEAM**



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Communications Specialist | E-Rate

### **AGENDA**

- Invoicing Overview
- Preparing to Invoice
- Filing an FCC Form 498
- Filing an Invoice
- Invoice Reviews
- Basic Maintenance of Internal Connections (BMIC)
- Record Retention & Open Data
- Case Studies
- Key Takeaways

# **Invoicing Overview**

### What is the applicant process?

470 471 486

Competitive Apply for Start

**472** 

474

**Invoice USAC** 

Competitive Bidding

Apply for Discounts

**Start Services** 

### **Invoice USAC**

#### **Billed Entity Applicant Reimbursement (BEAR) Form**

- Pay your customer bill (the bill you receive from your service provider) in full and maintain documentation associated with your FCC Form 472 (BEAR Form). The Commission records retention period is <u>at least 10</u> <u>years</u> from last date of the applicable funding year or the service delivery deadline for the funding request.
- Only bill USAC for the approved equipment/services delivered to the approved Recipient(s) of Service (ROS) at the quantities and rates not to exceed what was listed on the FCC Form 471.
- Answer any USAC invoice review questions.
- Certify and update the FCC Form 498 to provide your banking information and backup documents to the FCC for review.

472

### **Invoice USAC**

### Service Provider Invoice (SPI) form

- Pay your non-discounted share of costs on the customer bill (the bill from your service provider).
- Your service provider will invoice USAC for the discount amount using the FCC Form 474 (SPI Form).
- Answer any USAC review questions.

474

# **Preparing to Invoicing**

## **Before You Begin**

### **Select Invoicing Mode either BEAR or SPI:**

- Invoicing method is the applicant's choice and is made for each Funding Request Number (FRN).
- Method/Mode must be decided before invoicing begins.
- Once USAC processes an invoice for a FRN, the method of invoicing is set for that FRN and cannot be changed.
- Applicants notify their service providers of the invoicing method (FCC Form 472 or FCC Form 474).

## **Before You Begin**

### **Determine the invoice frequency:**

Monthly, bi-monthly, quarterly, one-time, etc.

Use the funding commitment decision letter (FCDL) or the Revised Funding Commitment Decision Letter (RFCDL) information to complete your invoice.

- Discount rate
- Approved Services, Costs and Quantities
- FCC Form 471 number and FRN
- Approved Recipients of Service (ROS)

## **Before You Begin: FCDL terms defined**

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

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

#### **Post-Discounts & Invoicing Amounts:**

- Pre-discount amount minus discount amount equals FRN commitment request 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 services/equipment using **non** E-Rate funds. The non-discount amount cannot be paid or credited by the service provider.

## Before You Begin: FCDL (example)

- **Pre-Discount:** (ex: \$18,360 calculated based on quantities and unit rates as applicable)
- Discount Amount: (ex: 40%)
- **Post-Discounts & Invoicing:** (ex: \$7,344)
- Non-Discount Amount: (ex: \$18,360 \$7,344 = \$11,016)

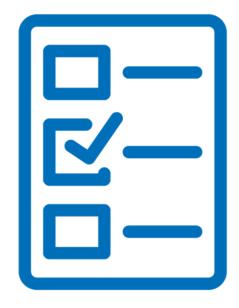
#### **FRN Calculation**

Monthly Charges	
Total Monthly Recurring Charges	\$1,530.00
Total Monthly Ineligible Charges	- \$0.00
Total Monthly Eligible Charges	= \$1,530.00
Total Number of Months of Service	x 12
Total Eligible Pre-Discount Recurring Charges	= \$18,360.00

Total Requested Amount	
Total Eligible Pre-Discount Recurring Charges	\$18,360.00
Total Eligible Pre-Discount One-Time Charges	+ \$0.00
Total Pre-Discount Charges	= \$18,360.00
Discount Rate	40%
Funding Commitment Request	= \$7,344.00

## Service provider verifications

- The Service Provider Annual Certification (SPAC), FCC Form 473
  - Service providers file annually to certify that they will comply with program rules and guidelines.
  - A new SPAC Form must be on file each funding year a service provider participates in the E-Rate program.
  - A SPAC is required for each <u>Service Provider Identification</u> <u>Number</u> (SPIN)/498 ID.
  - The FCC Form 473 must be filed before USAC will pay invoices.



# Filing an FCC Form 498

## Filing FCC Form 498

Pertinent financial information is collected via the FCC Form 498, allowing service providers invoicing via a SPI and applicants invoicing via a BEAR to receive disbursements. Service providers will receive a Service Provider Identification Number (SPIN, also known as 498 ID) and applicants will receive a 498 ID.

**Applicants:** Filed through EPC: Records/Create FCC Form 498

- Complete and certify the form.
  - Only an Official from the School or Library can perform all required actions (initiate, submit, modify, deactivate and certify).
  - A **General Contact** can complete, but **not** certify the form.
- EPC will automatically copy the 498 General Contact information into the Remittance Contact fields. If the Official
  and General contact are different people, remember to modify the entries in the Remittance Contact fields before the
  form is certified.
- Applicants and service providers may consult the <u>User Guide</u> to help with filing the FCC Form 498.

## Filing FCC Form 498

- Prior to beginning registration, applicants and service providers, should have all of the following information ready:
  - Name of the person(s) who will be the certifying Company Officer.
  - Electronic banking information (routing number and banking account).
  - Dun & Bradstreet (DUNS) Number
  - FCC Commission Registration (CORES ID)
  - How to <u>Register for a 498 ID</u>

### **FCC Form 498 Review**

USAC will verify your account information within two (2) business days, the submitter will be notified of approval or rejection via email.

- Once the FCC Form 498 is certified, you will receive an email from 498BankVerification@usac.org with a link to upload requested banking information.
  - A blank voided check or a copy of the bank account statement is acceptable documentation.
  - If you do not control your bank account, USAC requires a letter from the account owner (i.e., State/District/County Office/School District) or financial institution to confirm the account information.
- To check the status of your 498 ID, contact the Customer Service Center at 888-641-8722, option 5 (contributors) or email USAC at <a href="mailto:finops-processing@usac.org">finops-processing@usac.org</a>.

### FCC Form 498 Updates

You are required to update your 498 ID form under the following circumstances:

- Your banking information has changed (supporting documentation is required).
- You need to update information on an existing 498 ID.
- You need to add a new entity.
- You need to update the "New Business Type" field.
- You need to provide a DUNS Number.

Updates are not effective until the form is completed and certified by your School or Library Official and reviewed by USAC.

### **FCC Form 498 Reminders**

- If the status of an FCC Form 498 ID is not certified by the Library or School and approved by USAC, it will prevent approved invoices from being processed by the U.S. Treasury. (When an FCC Form 498 is uncertified, the banking information is not available to the U.S. Treasury) All payments that cannot be processed are returned to USAC as unpaid.
- Try to avoid making changes to the 498 ID while invoices are in process. If changes must be made such as updating or deactivating your current 498 ID to a new 498 ID, please make sure all invoices currently in process have been completed.
- Reasons why your 498 ID may be missing when you log in to file your BEAR:
  - Uncertified recent changes to your FCC Form 498 or banking information
  - Typographical errors
  - Missing banking information
  - 498 ID is not linked to your BEN

# Filing an Invoice

## **Resources for Invoice Filing**

FCC Form 472 Billed Entity Applicant Reimbursement (BEAR):

- BEAR Training Video
- BEAR Training Site
- BEAR Form Filing Guide

FCC Form 474 Service Provider Invoice (SPI):

- FCC Form 474 filing
- SPI Training Video
- SPI Form Filing Guide

### When to File an Invoice

Invoices must be submitted before the invoice filing deadline.

- Generally, the date is October 28 for recurring services and January 28 for non-recurring services.
- Current Invoice Deadline Date (IDD) are posted in EPC on the FRN detail screen.

The IDD is no later than 120 days after the latest of the following:

- Service Delivery Deadline (SDD) is the last date to receive service.
- Date of the FCC Form 486 Notification Letter.
- Date of the approved post-commitment RFCDL.
- Date of an approved appeal RFCDL for a previously denied or reduced funding request.

## **Invoicing Reminders**

- Payments:
  - BEAR Invoices: Applicant has paid service provider in full within 90 days of receiving services and before invoicing E-Rate.
  - SPI Invoices: Applicant pays the service provider their non-discounted portion within **90 days of receiving services.**
- Invoice USAC only for your FCC Form 471 approved eligible equipment/services, in the correct quantity and rates, and delivered only to the approved ROSs.
- Invoiced amount must be **actual charges**, not the amount committed through the E-Rate program.
- Manual calculations for prorated amounts must be accurate.
- Billed rates must not exceed the contracted rate. USAC will only pay up to the contracted rate.
- Make sure all equipment purchased is installed and in use before the Service Delivery Date.
- Establish a process to prevent duplicate invoice submission.

### **Invoice Deadline Extension**

- Filers are entitled to request one 120-day Invoicing Extension per FRN.
- You can file an invoice filing deadline extension request even if you do not use or need it.
- Extensions are filed by the applicant and service providers within EPC.
- If deadline to file an invoice or to request an invoice filing deadline extension is missed, a request for waiver of the invoice filing deadline must be filed with the FCC and approved before any additional payments can be paid.

## **Equipment**

- If an applicant returns equipment to the service provider prior to invoicing USAC, neither the applicant or service provider should invoice for the cost for this equipment.
  - If an invoice for returned equipment has been paid, disbursements must be returned to USAC. The USAC website contains more information on that process.
  - If an invoice for returned equipment has been submitted and not paid, it can be cancelled by opening a customer service case.
- If the approved equipment is no longer available, a Service Substitution request needs to be filed for the new model. The total commitment for that FRN cannot be increased.

## **Invoice Reviews**

### **Invoice Review**

All invoices undergo a series of automated reviews to validate information such as:

- FCC Form 471 number
- Discount percentage
- Available funding
- FRN
- SPAC Form
- IDD and SDD

Errors in any of the above will result in rejection.

Invoices may also go through a manual review process too.

### **Manual Invoice Review: Validations**

The reviewer verifies, among other things, that:

- The customer's bill accurately reflected the invoiced amount.
- Discounts are properly applied.
- Entities listed on bills are approved ROSs on the approved FCC Form 471.
- Quantity of equipment.
- Equipment and services are eligible and approved on the FCC Form 471's FCDL.
- Ineligible equipment and services not removed at submission, are modified during the invoice review.
- Changes in services or equipment not received require a USAC-approved service substitution.
  - Ensure that service substitution requests are submitted to the E-Rate program for approval when the original eligible equipment and service requested are substituted.
  - Ensure that processes are in place to ensure that the invoiced services match the contracted services.

### **Manual Invoice Review: Outreach**

- Outreach can occur to request additional information or documentation from the applicant or service provider.
- Outreach can occur to request additional information to make a disbursement decision.
- Timely responses allow the review to occur and payments to be made.
- Applicants & service providers have seven calendar days to respond and may request a seven-day extension.
- If you have a large invoice with significant components, you may request worksheet in lieu of bills.

### **Invoice Review: Service Certification**

Some manual reviews require additional documentation to demonstrate:

- The applicant paid their share of non-discounted costs.
- The invoiced equipment or services were delivered and/or installed.
- Progress payments were included in the contract.

USAC reviewers may send questions to the applicant or service provider, with a response due by "response requirement date."

#### The applicant completes the certification and returns it directly to USAC.

 Applicants should be timely in responding. Failure to respond may result in the invoice being denied.

USAC reviews the information provided during the review.

# **Service Certification - Example**



Privileged and Contains Confidential Information

#### Service Certification for E-Rate Invoices

Invoice Number	«SLD_Invoice_No»				
Invoice Line Number	«Line_ID»				
Service Provider Name / Service Provider SPIN	«Service_Provider_Name» «SPIN»				
Service Provider Invoice #	«SP_App_Invoice_No»				
Undiscounted Invoice Amount	«Undiscounted_Amt»				
Discounted Invoice Amount	«Discounted_Amt»				
Applicant Name					
Authorized Representative / Contact Name & Title					
Authorized Representative / Contact Phone					
Billed Entity Number (BEN)	«BEN»				
471 Number	«M_471»				
FRN	«FRN»				
Date Goods/Services Delivered					
Date Goods/Services were or will be installed					
Date Applicant Portion Paid and Check No. or Date will be paid					

#### By signing below, you certify that:

- 1. I am authorized to represent the above named Applicant.
- The equipment/services described on the attached vendor invoice(s) have been delivered and/or installed as indicated on or by the date(s) above.
- The equipment and services described on the attached Service Provider invoice meets the following criteria: (Copy of detailed vendor invoice must be attached)
  - Equipment and services requested are approved on the FCC Form 471
  - Unit cost and quantity per location do not exceed the amounts approved on the FCC Form 471
    All equipment has been delivered/ installed at ROS locations approved on the FCC Form 471 listed on
  - All equipment has been delivered/ installed at ROS locations approved on the FCC Form 471 listed or the date provided above

### **Invoice Modification and Denials**

- Automated and Manual Invoice reviews can result in:
  - Approval
  - Modification
  - Denial
- Common Reasons for Modification:
  - Discounts applied incorrectly
  - Removal of ineligible equipment and/or services
  - Ineligible ROSs

### **Invoice Modification and Denials**

- Common Reasons for Denial:
  - Non-response to outreach.
  - Invoice contains only ineligible equipment/services.
  - Invalid or incomplete service certification.
- If an invoice has been rejected, applicants and service providers can resubmit the invoice with corrected information.
  - The invoice with corrected information will need to be submitted prior to the IDD.

#### **Invoice Decision Codes**

- USAC processes the invoice request and issues its <u>invoicing decision</u>.
- When the invoice mode is BEAR, the applicant and the service provider receive a copy of the FCC Form 472 BEAR Notification Letter. Service providers will receive a remittance statement after filing a SPI Form.
- Invoice Decision Codes explain the reason for any modifications or denials.
- Invoice information is also available in Open Data.
- For more details on a particular invoice, contact the USAC Customer Service Center (CSC).



Available for Public Use

Decision Code	Plain Language Decision Explanation	Historical Decision Explanation (Letters issued before October 1, 2020) Either Billed Date or Shipped Date must be entered.			
40	Either a Customer Billed Date or a Shipping Date to Customer must be entered on this invoice line.				
41	Either a Customer Billed Date or a Shipping Date to Customer, but not both, must be entered on this invoice line.	Both Bill and Ship Date cannot be entered			
42	The Total (Undiscounted) Amount was not provided on the invoice line.	Total (Undiscounted) Amount for Service per FRN (Not Provided)			
44	The Discount Amount Billed to SLC was not provided on the invoice line.	Discount Amount Billed to SLC (Null or Zero)			
48	The undiscounted amount multiplied by the discount percentage for this FRN is lower than the requested invoice amount.	Discount Amt. Billed Not Valid			
60	The service provider has not certified an FCC Form 473 for the funding year.	Service provider must be certified			
67	The Shipping Date to Customer is after the Contract Expiration Date or the Service End Date (whichever is earlier).	Ship Date > [%s] days (486) Early Term Dt			
68	The Shipping Date to Customer is after the Contract Expiration Date or the Service End Date (whichever is earlier).	Ship Date> [%s] days 471 Term or Cnt Ext			
75	The Customer Billed Date entered on the invoice line is outside of the funding year for this FRN.	Billed Date after [%s] fund yr;one time cost			
76	The Customer Billed Date entered on the invoice line is outside of the funding year for this FRN.	Billed Date after [%s] fund yr;mnthly cost			
77	The Shipping Date to Customer entered on the invoice line is outside of the funding year for this FRN.	Shipped Date after [%s] fund yr;one time cost			
78	The Shipping Date to Customer entered on the invoice line is outside of the funding year for this FRN.	Shipped Date after [%s] fund yr;mnthly cost			
80	This invoice was submitted after the invoicing deadline for the FRN.	Invoice Received Date is later than Invoice Received Extension Date for FRN			
81	The Customer Billed Date entered on the invoice line is after the Invoice Deadline Date.	Bill Date [%s] > [%s] Billed Extension Date; one time cost			

# **Invoicing Appeals**

- If your timely filed invoice is rejected or modified, you have the right to appeal the decision.
- Appeals must be first filed with USAC.
- You have 60 days to appeal to USAC.
- Appeals filed after 60 days after the decision date are automatically denied and a waiver must be filed with the FCC.
- If USAC denies the appeal, you have 60 days to appeal that denial to the FCC.
- Waivers of the Commission's rules, such as the invoice deadline rule, can only be sought from the FCC.
- Additional information on the appeals and waivers is available on <u>USAC's website</u>.

# Basic Maintenance of Internal Connections (BMIC)

### **Basic Maintenance of Internal Connections (BMIC)**

- What is Basic Maintenance of Internal Connections?
  - Repair and upkeep of eligible internal connections.
  - Two Standard Subcategories of BMIC
    - In Person Services: On-site Repairs (Time and Material Contracts)
    - Remote Services: Maintenance Support Services (such as, basic technical support, configuration changes, bug fixes, patches, software upgrades, support service subscription licenses, technical support licenses)
- The products being maintained must be eligible in order for the maintenance to be eligible for E-Rate support.
  - If repair or replacement work is performed under a maintenance contract, USAC will only reimburse for the actual work performed.
- The <u>Eligible Services List</u> issued by the FCC defines eligible BMIC services each year.

# **Examples of BMIC**

- Examples of eligible Basic Maintenance:
  - Repair and upkeep of eligible hardware (On-Site Support /Time and Materials)
  - Wire and cable maintenance (On-Site Support / Time and Materials)
  - Configuration changes (Remote/Maintenance Support Services)
  - Basic technical support including online and telephone-based technical support (Remote / Maintenance Support Services)
  - Software upgrades and patches including bug fixes and security patches (Remote / Maintenance Support Services)
- Any license that is providing a maintenance functionality should be requested under BMIC on the FCC Form 470/471 (not access or right to use licenses).

# **Examples of Non-BMIC Products / Services**

- BMIC Services **DO NOT** Include:
  - Actual Equipment being maintained (e.g., cabling, access points, switches) (Eligible under Internal Connections, IC)
  - Unbundled warranties (Not Eligible for E-Rate Funding)
  - Network management services, including 24-hour network monitoring (Eligible under Managed Internal Broadband Services, MIBS)
  - The management, operation and monitoring of eligible broadband internal connections (Eligible under Managed Internal Broadband Services, MIBS)
  - Maintenance on ineligible equipment (Not Eligible for E-Rate Funding)
  - Internal connections software (including Right to Use and Client Access Licenses to make equipment functional): Internal connections software allows the equipment to function and distribute high-speed broadband, they do not provide support or maintenance, and are therefore ineligible as BMIC. Such software is eligible as internal connections.

# **BMIC - Mixed Categories**

Equipment that has mixed BMIC & IC functionality

- Some vendor licenses may include both BMIC & IC functionality such as Right-to-Use (RTU) and Maintenance services on the same license.
- Split the license based on functionality (i.e., RTU and maintenance) into separate FRNs for BMIC and IC: Contact the manufacturer or CSC to obtain the breakdown for specific functionality for a specific mixed services license.

# **Changing Service Types After Submitting FCC Form 471**

- All services must be properly bid during the FCC Form 470 process.
- Ensure your FCC Form 470 clearly explains what licenses you are seeking bids on.
- FCC Form 470s are required in order for corrections to be made on the FCC Form 471.
- Changes identified after the FCC Form 471 and before the FCDL is issued:
  - Submit a Receipt Acknowledgement Letter (RAL) to make the correction
- Changes identified after the FCDL is issued:
  - Submit a Service Substitution request with a detailed narrative
    - Background information
    - Calculation for changes (single vs. multi-year)
    - Reason for the correction

# Time and Materials / On-Site Maintenance Example

- In person repair of eligible internal connections equipment
- Billed at an hourly rate
  - Example: A cable is cut or frayed and the service provider sends on-site maintenance to repair the cable.
- Applicant is billed for both the time and necessary materials to complete the repair.
- When invoicing E-Rate for Time and Materials BMIC please provide the hours worked, the hourly rate, and the equipment being maintained.

# Maintenance Support Service (Single Year): Cisco Smartnet Example

- Includes eligible BMIC services such as:
  - Full-time global access to the Cisco Technical Assistance Center.
  - Ongoing operating system software updates and upgrades.
- Also includes an ineligible service:
  - \*Next business-day advanced hardware replacement\* = Unbundled Warranty
  - Next business-day advanced hardware replacement is an ineligible BMIC service because it is considered an unbundled warranty and purchased as a retainer (i.e., the customer pays in advance for professional work to be specified later) not as an actual maintenance service.
- Check to see what services are eligible and ineligible in the <u>E-Rate Eligible Service List</u> (ESL).

# Maintenance Support Service (Single Year) Continued

- Cisco Smartnet
  - Includes an eligible and ineligible services.
  - Therefore: Cisco Smartnet is partially eligible for BMIC support.
- Your service provider can provide more information regarding product/service eligibility.
- Contact our Customer Service Center for assistance

# **Multi-Year Maintenance Support Service**

#### **Multi-Year Maintenance Support Service Requirements:**

- Preventive and remedial services that physically repair or optimize hardware, including contract maintenance and per-incident repair
- Services are only eligible for one funding year at a time.
- Apply for funding for each year separately.
  - Example: A 3-year maintenance contact for \$12,000 can be submitted for reimbursement for each funding year associated for a maximum of \$4,000 per funding year.
  - \$12,000 (total cost) / 3 (years) = \$4,000 / year.

#### **Submitting a Multi-Year Services Request:**

- Prorate the cost of the service for one year and only invoice after the services are received for the applicable funding year.
  - If services extend outside the funding year window, the invoice will be modified to only pay the current funding year services.
- Inform the reviewer which year of the multi-year contract you are invoicing for.
  - Example: 3-year maintenance contract for FY 2020 -2023, when submitting your request for your 2nd year, indicate that fact to the reviewer.

# Multi-Year Maintenance Services Example

- Applicant received Palo Alto 3-year Premium support: A 24-hour access, 365 days a year service to get the latest upgrades and updates.
- During the submission of the FCC Form 471 request, the applicant should:
  - Cost allocate the services by year and only invoice for 1 year of the services.
  - Each year submit a new FRN for each year of service.
- Since the applicant-has already been billed for the 3-years upfront, when
  providing an invoice, the applicant/service provider would use the same invoice
  from year one. The applicant/service provider should also explain to the reviewer
  why the bill date is outside of the funding year as the services were prepaid
  during year one.

### **Modified Reimbursement for BMIC Services**

When would a BMIC request not be reimbursed in full?

- Maintenance was performed on ineligible/partially eligible equipment.
- BMIC license was only partially eligible for funding such as Cisco Smartnet previously discussed.
- Reimbursement request included reimbursement for future months of service.
  - BMIC invoices will only be reimbursed after the services have been delivered for the applicable funding year.

#### **Reimbursement Overview**

- Overview of a 2021 BMIC FRN
  - The total pre-discounted amount of the FRN is \$120, with an 80% discount rate
  - Discount amount invoiced to USAC is \$96
  - An applicant or service provider may not invoice for the full \$96 discounted amount unless the services are provided. BMIC services must be invoiced based on the amount of BMIC services received.
  - The discount amount can be invoiced in different ways so long as it is after the services are received.
  - For example, if services are delivered monthly, the submitter may:
    - Invoice monthly after services are received (\$96 / 12 months) = \$8 / month
    - Invoice quarterly after services are received (\$96 / 4 quarters) = \$24 / quarter
    - Invoice annually after all services are received = \$96 / annually

### Reimbursement Example

If the submitter is receiving consistent monthly services (such as with a maintenance support service), the submitter should only invoice for the current month, which is dependent upon when the applicant submits their invoice.

- Examples: \$120 pre-discount, 80% discount rate, \$96 discounted amount
  - Invoice is submitted in December 2021 and the start date is in July 2021
    - At that time, E-Rate support would reimburse for services delivered through December 2021
    - Eligible Reimbursement Amount = \$48 (half of the full year's amount)
  - Invoice is submitted in July 2021 and the start date is in July 2021
    - Invoicing will pay for one month of service July
    - Eligible Reimbursement Amount = \$8 (one month of the annual discounted amount)
  - Invoice is submitted June 2022 or later.
    - Invoicing will pay up to 12 months of service since the services are now complete.
    - Eligible Reimbursement Amount = \$96 (entire discounted amount)

# **Invoicing for BMIC Services**

- When should you invoice for BMIC services?
  - After services were received; reimbursements will be reduced to remove any future dates of service.
- Steps to take before invoicing:
  - Check the E-Rate eligible services list to ensure services requested are eligible.
  - Check your service provider's website or contact the E-Rate customer service center to get an estimate of the eligibility percentage of the service.
  - Invoice accurately by removing ineligible portions of your product / service
    - Your invoice payment will be reduced by the ineligible amount so that only the eligible portion of the services are reimbursed through the E-Rate program.
  - Obtain hourly rate information for any fixed price contracts and invoice E-Rate at the hourly rate and include these details in the contract documentation (<u>September 6, 2019 News Brief</u>).
  - Ensure you are only invoicing for BMIC services that have been received.
    - Invoice up to the current month for services received.
    - Multi-year contracts are only eligible for one funding year at a time.

# **Streamlining BMIC Reviews: Tips for Success**

- To assist with streamlining the invoicing review process, the applicant may choose to upload a copy of their contract for BMIC services to the contract record after filing their FCC Form 471.
- If a contract cannot be provided, other relevant documentation can include: a bill, quote or a copy of a legally binding agreement.
- Check the Eligible Services List (ESL) before submitting your invoice to ensure your equipment /services meet eligibility requirements.
- Obtain an hourly rate from your service provider for time and materials / on-site BMIC services

# **Record Retention & Open Data**

#### **Documentation**

Ensure adequate documentation is retained to:

- Support amounts invoiced to the E-Rate program.
- Demonstrate compliance with FCC rules.
- Demonstrate that the costs of equipment and services requested for E-Rate support were properly allocated between eligible and ineligible items, locations or recipients of service.

Detailed **Document Retention** Requirements are available on USAC's website.

#### **Documentation**

- Maintain a reconciliation worksheet that includes:
- Service provider bill number.
- Billed service/product.
- Quantity and per unit cost.
- Extended billed amount.
- Sum of all of the extended bill amounts agrees to the total (undiscounted).
- Amount for equipment or service requested on the BEAR form can be traced to the actual copies of the service provider bills.

#### **Sample Reconciliation worksheet**

Service Provider Bills									
Service Provider Bill	Billed Service/Product	Billed Qty	Billed Per U	Init Cost	Billed	Extended Cost			
INV101	Product A	5	\$	10.00	\$	50.00			
INV102	Product B	5	\$	15.00	\$	75.00			
INV103	Product C	5	\$	20.00	\$	100.00			
INV104	Product D	5	\$	25.00	\$	125.00			
INV105	Product E	5	\$	30.00	\$	150.00			
			Total Eligible						
			(undiscounted) Amount for Service on						
			BEAR		\$	500.00			

# **Locating Key Invoicing Information**

Current IDD and/or SDD Information

- EPC: The IDD and SDD are included in the FCDL and RFCDL.
- Dataset: <u>E-Rate Request for Discount on Services: FRN Status</u>
  - Column D "form version" field filter should be set to "Current."

Disbursement Data: <u>E-Rate Invoice Disbursements Data Lookup Tool</u>
General Open Data Information & Training

Open Data video guides and Open Data platform

# **Case Studies**

### **Case Studies: Similar Line items**

#### **First Invoice:**

- #1237851
- Submitted 7/1/2021
- Inv. amount \$842.00
- FRN 200047510
- customer bill date of 7/1/2021

#### **Second Invoice**

- #1237895
- Submitted on 8/1/2021
- Inv. amount \$842.00
- FRN 200047510
- customer bill date of 7/1/2021

Question: How will USAC process the second invoice?

### **Case Studies: Similar Line items**

#### **Answer:**

- USAC's system will flag the second invoice as a possible duplicate because the start date and amount billed were the same on both invoices. To resolve the matter, USAC will conduct outreach.
- The invoice reviewer will request documentation to support both invoices and to demonstrate that the second is not a duplicate.

#### To avoid this problem:

• The date on each line item should be the date service started **for that line item.** The second invoice should have a customer bill date of 8/1/2021.

### **Case Studies: Customer bill**

- Applicant submits a BEAR requesting \$1,600.00 reimbursement for Basic Maintenance of Internal Connections (BMIC).
- The service provider provides this customer bill.

#### **INVOICE**

LMN Service Provider 123 Main Street Tacoma, Washington 98444

Little Red School 12345 Gravelly Lake Drive Lakewood, Washington 98409

Basic maintenance \$2,000.00

**Question:** What information is missing from the customer bill?

### **Case Studies: Customer bill**

#### **Answer:**

The bill should include the following:

- A description of the work performed.
- Equipment repaired or replaced.
- Hours worked, date(s) and time(s).

#### To avoid this problem:

- Request detailed bill from service provider.
- Used the approved discount rate.
- Reconcile the customer bill and the requested reimbursement.

#### INVOICE

LMN Service Provider

123 Main Street

Tacoma, Washington 98444

Little Red School

12345 Gravelly Lake Drive

Lakewood, Washington 98409

Basic Maintenance \$2,000.00

#### **Description:**

- Two hours of onsite maintenance
- Performed on August 21<sup>st</sup> 2019
- On product APC SMART-UPS 3000VA RM 2U LCD

### **Case Studies: Service Certification**

- USAC receives an invoice for a router which includes installation.
- The invoice reviewer sends a service certification to the applicant requesting verification that the router was delivered and installed.
- The service provider is carbon copied on the outreach message to the applicant.

#### **Questions:**

- Who should complete and sign the service certification?
- Who should send it to USAC?

### **Case Studies: Service Certification**

#### **Answer:**

- Service certification must come directly from the applicant to USAC. If the applicant sends the service certification to the service provider, the reviewer will reach out to the applicant to verify that the applicant completed the certification.
- If there is no response within 7 days, the invoice will be rejected.

#### To avoid this problem:

• The applicant should send the completed service certification directly to USAC.

# **Key Takeaways**

# **Key Takeaways**

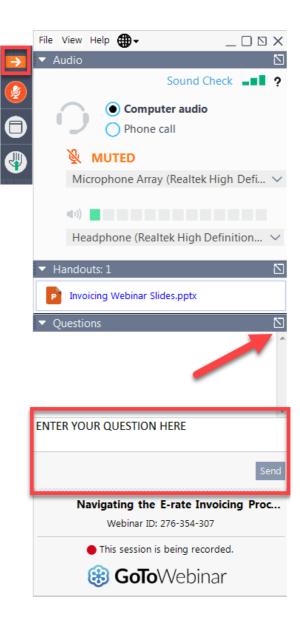
- Invoices can be submitted until Invoice Deadline Date.
- Request a one-time invoice deadline extension, even if you do not anticipate needing one.
- Only invoice for the specific services approved on your FCC Form 471 at the quantities and rates approved and only for the approved Recipients of Service (ROS).
- Ensure you have the accurate FCC Form 471, FRN, FCDL/RFCDL, discount rate, approved cost of service, calculations, invoice amount.
- Remove ineligible items (equipment and services not approved on FCC Form 471, for FY and ROS).
- Establish a process to prevent duplicate invoice submission.
- Retain your supporting documentation and bills for all invoices for at least 10 years.
- Respond in a timely manner to all outreach to expedite your payment.
- Parties have 60 days to appeal decisions to USAC and 60 days from the date of the USAC appeal decision to appeal to FCC. Waivers should be filed directly with the FCC.

#### Resources

- Applicant invoicing
- Service provider invoicing
- Open Data
- 498ID
- Webinars & Training
- E-Rate News Brief

# Housekeeping - Q&A

- Use the "Questions" box in your webinar control panel to submit your question in writing.
  - Click the box with the arrow above the questions box to expand it.
  - Ask questions related to webinar content.



# **Questions?**

### **Customer Service Center (CSC)**



Call us at (888) 203-8100

Monday – Friday 8 a.m. to 8 p.m. ET



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

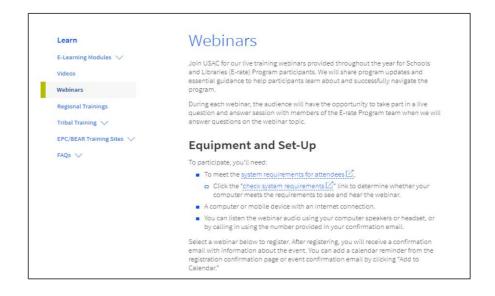
- 1. Log in to EPC.
- 2. Select the **Contact Us** link from the upper right menu on your landing page.



# **Upcoming Webinars**

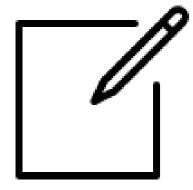
Check the E-Rate Webinars page for updates on future webinars.

For additional information subscribe to the **E-Rate News Brief** 



Go to the E-Rate Webinars page for additional information.

# **Take Our Survey**



- We want to hear about your webinar experience.
- A survey will pop up at the end of this webinar.
- If you are unable to complete the survey at the end of the webinar, please expect an email from USAC E-Rate Outreach Team with a unique survey link in 1-2 business days.
- We appreciate your feedback!



# **Thank You!**

