



Program Integrity Assurance (PIA) Review and the Selective Review Process

E-Rate Program Participant Webinar
April 18, 2024

Disclaimer

- To accommodate all attendees, real-time closed captions will be present during this presentation.
- We apologize in advance for any transcription errors or distractions. Thank you for your support.

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- The audience will remain on mute.
- Use the **Questions** box to ask questions at any time.
- You can download the slide deck from the **Handouts** section of the webinar panel.



The screenshot displays the GoToWebinar interface. At the top, there is a menu bar with 'File', 'View', and 'Help'. Below this, the 'Audio' section is visible, showing 'Sound Check' with a green signal indicator and a question mark. The audio output is set to 'Computer audio' and is currently 'MUTED'. The microphone is set to 'Microphone (HD Webcam C510)'. Below the audio settings, there is a volume slider and the output device is set to 'Speakers (High Definition Aud...'. The 'Handouts: 2' section shows two files: '2017-05-05_11-59-21.png' and 'GTM iOS.jpeg'. The 'Questions' section is empty, with a text input field containing '[Enter a question for staff]'. Below the input field, there is a red button that says 'Ask questions here!' and a 'Send' button. At the bottom, there is a footer with the text 'Multi sessions different registrants', 'Webinar ID: 960-960-603', and the GoToWebinar logo.

Download PDF of Slides here!

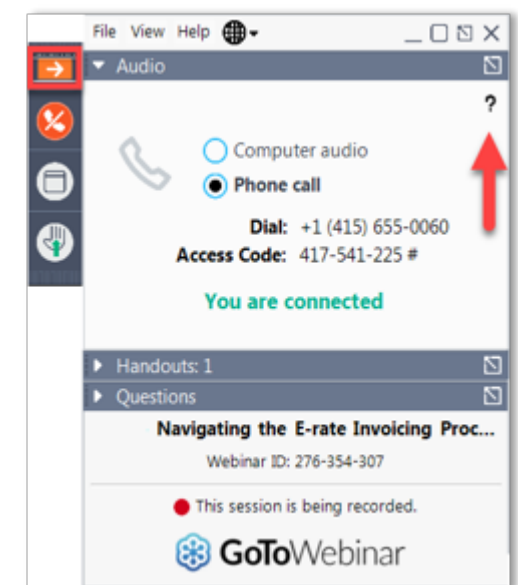
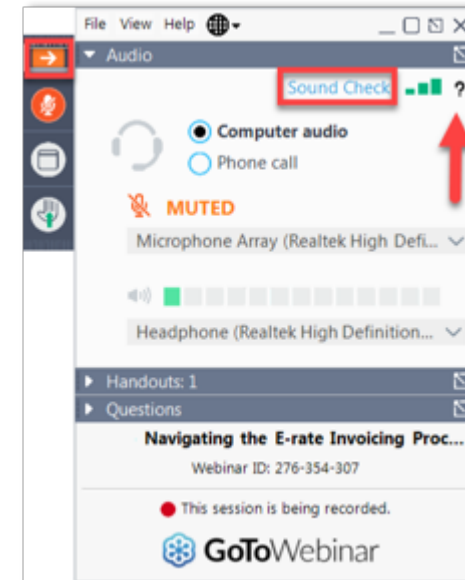
Ask questions here!

Multi sessions different registrants
Webinar ID: 960-960-603

 GoToWebinar

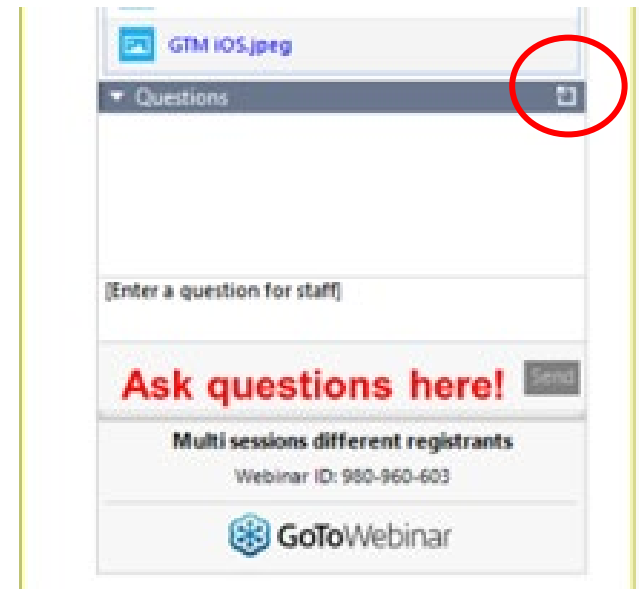
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- Click the **Sound Check** link, then the question mark icon to test your audio.
- If you lose audio or the slides freeze, restart the webinar.
- Check that your computer meets GoToWebinar's system requirements by exiting the webinar and clicking the **Check System Requirements** link in your event confirmation email.
- If issues persist, call (833) 851-8340 to troubleshoot with GoToWebinar.



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.
 - Write in full sentences.
 - Ask one question at a time.
 - Ask questions related to today's webinar content.
- To view answers:
 - Click the box with the arrow icon in the top right corner of the **Questions** box to expand it and reveal all written answers.



E-Rate 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

1. Log in to the [E-Rate Productivity Center \(EPC\)](#)
2. Select the **Contact Us** link from the upper right menu on the landing page.

Meet Our Team



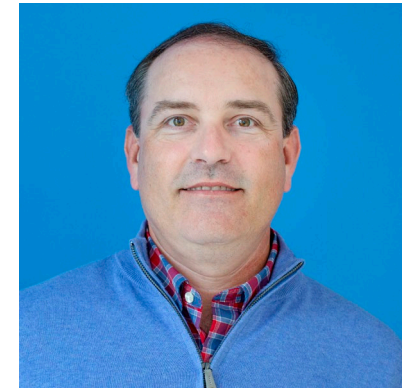
Lisette LaForge

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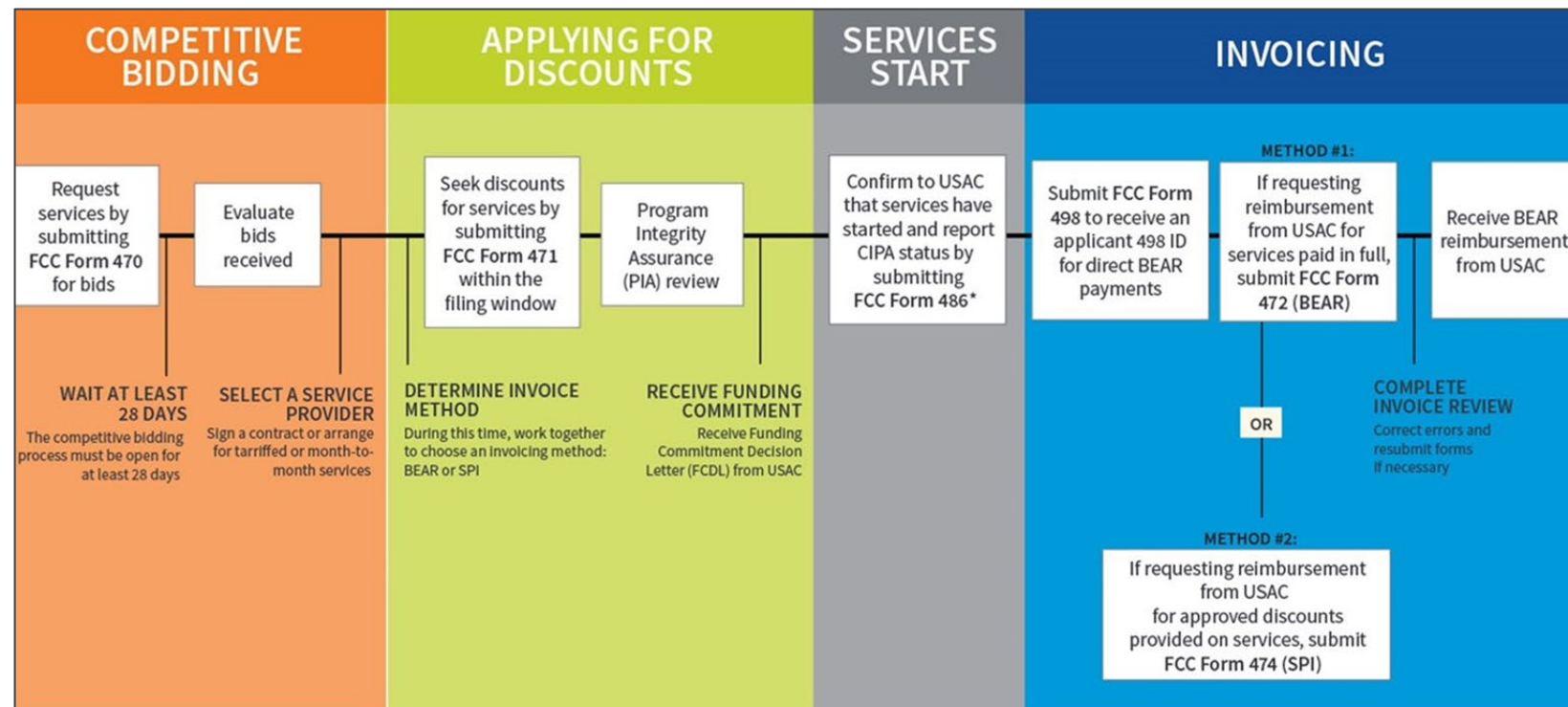
Agenda

- FCC Form 471 Review Process
- Preparing for a PIA Review
- PIA Inquiries
- Selective Review
- Funding Commitment Decision Letters
- Q&A

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.



E-Rate Forms

Service Provider FCC Forms

498

Service Provider ID Number

473

Service Provider Annual Certification

474

Service Provider Invoice

Obtain a SPIN



Certify Compliance



Invoice USAC

Applicant FCC Forms

470

Requesting Services

471

Applying for Discounts

486

Starting Services

472

Billed Entity Application Reimbursement

Know Your Role in the PIA Process and Beyond

- **Applicants**

- Determine services needed, file FCC Form 470 (and RFP, if desired)
- Run competitive bidding process
- Select the most cost-effective bid
- **Respond** to the PIA
- **File** other applicant forms (FCC Forms 471, 486, 472, 500, etc.)
- **Document** their compliance with FCC rules on an ongoing basis
- **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
 - with responding to the PIA on technical services questions (but not competitive bidding)
 - **File** service provider forms (FCC Forms 473, 474, etc.)
 - **Document** your compliance with FCC rules on an ongoing basis
 - **Retain** documentation for at least **10 years** from the last date of service delivery
 - Must **contribute** to the Universal Service Fund
 - 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.



FCC Form 471 Status While Under Review

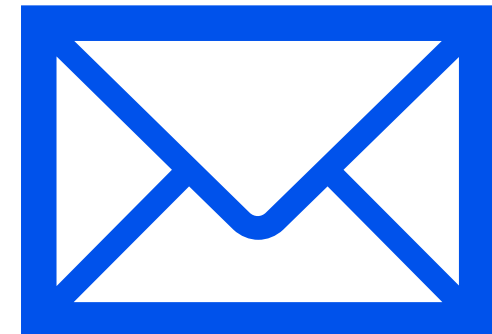
- Your form's status in the EPC will change as it progresses through the review process.
- Your application may revert to a previous status because this process involves multiple levels of review.

Review Status Bar



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
 - 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
- Common PIA requests for supporting documentation include:
 - Documents to validate entity information (e.g., surveys for alternative discount calculations)
 - 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.

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 receive an EPC notification



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
 - Community Eligibility Program (CEP) documentation
- Use the [E-Rate Program Applicant Document Retention List](#) as a guide.

Available for Public Use



Schools and Libraries (E-rate) Program Applicant Document Retention List

This list provides guidance regarding what E-rate Program related documents should be retained by applicants to comply with FCC [document retention](#) requirements. This guide provides document retention guidance to E-rate Program applicants. It includes items that do not apply to every applicant and is not an exhaustive list.

For forms filed in the [E-rate Productivity Center \(EPC\)](#), you can print a PDF copy of forms, letters and correspondence for your records.

1. FCC FORMS & CERTIFICATIONS

- 1.1. FCC Form 470
- 1.2. FCC Form 471
- 1.3. FCC Form 498 - applicants filing FCC Form 472 (BEAR)
- 1.4. FCC Form 472 - Billed Entity Applicant Reimbursement (BEAR)
- 1.5. FCC Form 479 - consortium members & consortium leaders only
- 1.6. FCC Form 486
- 1.7. FCC Form 500
- 1.8. Delivery confirmations for forms filed outside of EPC

2. USAC LETTERS

- 2.1. FCC Form 470 Receipt Notification Letter (RNL)
- 2.2. FCC Form 471 Receipt Acknowledgment Letter (RAL)
- 2.3. FCC Form 471 Out Of Window Letter (OOW)
- 2.4. Funding Commitment Decision Letter (FCDL)
- 2.5. Revised Funding Commitment Decision letter (RFCDLs)
- 2.6. FCC Form 486 Notification Letter
- 2.7. FCC Form 486 Urgent Reminder Letter
- 2.8. FCC Form 500 Notification Letter
- 2.9. FCC Form 472 (BEAR) Notification Letter
- 2.10. Quarterly Disbursement Reports (QDR)
- 2.11. Other USAC letters

usac.org/e-rate

Updated April 2021

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 FY2023, both the applicant and the service provider must retain all records until at least June 30, 2034.
- 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.



PIA Inquiries

Responding to PIA Inquiries

- To avoid delays, provide:
 - Complete responses to all questions
 - 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 services being provided
- Contact your reviewer with questions

PIA Inquiries – 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
 - A hyperlink to your application (the gray bar at the bottom of the notification)

TIP: Find notifications by searching "471 Review Team" in the **News** feed.

To Access PIA Inquiries in the EPC

- View your PIA inquiries within the FCC Form 471 record:
 - Navigate to **Review Inquiries**
 - Select **Respond to Inquiries**
 - 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.

Records / FCC Forms 471

REQUEST EXTENSION RESPOND TO INQUIRIES SUBMIT MODIFICATION REQUES...

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

Pending Inquiries

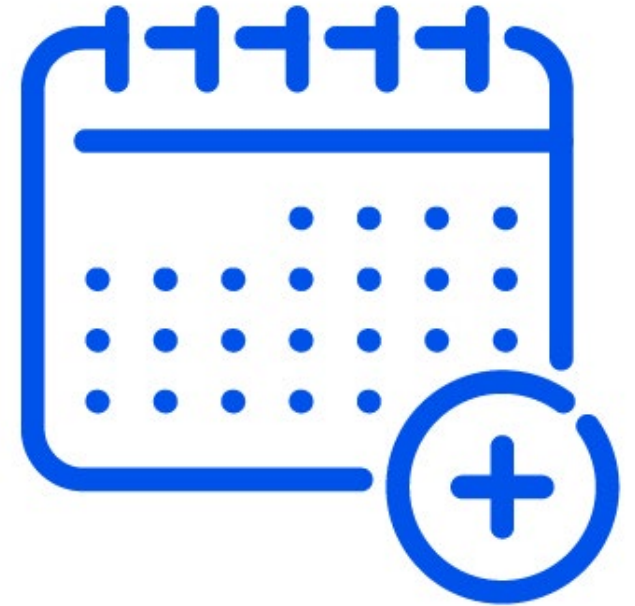
Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date	Due Date	Extn.	Status
		Other Issues	Modification Notification	PIA Reviewer	Assistant Program Analyst		3/23/2022 9:57 AM EDT		0	No Response Needed

Submitted Inquiries

Name	Outreach Type	Answered By	Assigned Date	Answered Date
Eligibility of Products and Services	Regular 15-Day	Applicant	3/21/2022 10:32 AM EDT	3/22/2022 1:56 PM EDT
Eligibility of Products and Services	Regular 15-Day	Applicant	3/21/2022 10:32 AM EDT	3/22/2022 2:01 PM EDT

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 the EPC
2. Choose **Review Inquiries**
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 or contact the Customer Service Center.



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	Incorrectly classifying the category of service or equipment/service type on the FCC Form 470	Filing an inaccurate FRN with the wrong equipment/service type	Failing to remove ineligible services/equipment
Prevention Tips	<ul style="list-style-type: none"> 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). 	<ul style="list-style-type: none"> 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. 	<ul style="list-style-type: none"> 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 :
 - Contains both eligible and ineligible components
 - Include in your bid what the eligible percentage is, if not 100 percent
 - Is utilized for eligible and ineligible uses
 - For example, a server that is used for both caching (eligible) and video distribution (ineligible)
 - Is 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)

PIA Verification of Mixed Eligibility (Cont.)

- 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 ineligible purposes are ancillary and do not require cost allocation (e.g., use by ineligible pre-K children in an eligible building).

Selective Review

Selective Review: Introduction

- Some applications undergo additional review further to a PIA Review.
- USAC may request more detailed responses than those required in a PIA review.
- Selective reviews:
 - Include all aspects of the competitive bidding process
 - Are independent of other reviews conducted under PIA which may or may not still be in progress



Selective Review: Process

- USAC sends a **Selective Review Information Request (SRIR)** email to the FCC Form 471 contact informing them that their entity has been chosen for selective review.
- The email provides information about how to submit a response and includes a link to access the SRIR in the EPC.



Selective Review: Receipt

- If you receive a Selective Review Information Request (SRIR), you should:
 - Confirm receipt of the SRIR by contacting the reviewer named in the request
 - Provide a complete response and all requested documentation to avoid delaying the review
 - Label each document with Funding Request Numbers (FRNs) and descriptions that identify them



Selective Review: Response

- Who can respond to Selective Review Information Requests?
 - Applicants or authorized representatives of applicants (EPC Account Administrators and Full-Rights users)
- Contact your reviewer with any other questions.



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
 - 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 & Invoicing Amounts:**
 - Total Eligible Charges *times* the discount rate equals the FRN committed amount on the FCDL.
 - The “Commitment Request” in the 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 cannot be paid or credited by the service provider.

After Receiving the FCDL

- After the FCDL is delivered, applicants can:
 - Discuss service details with your 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)

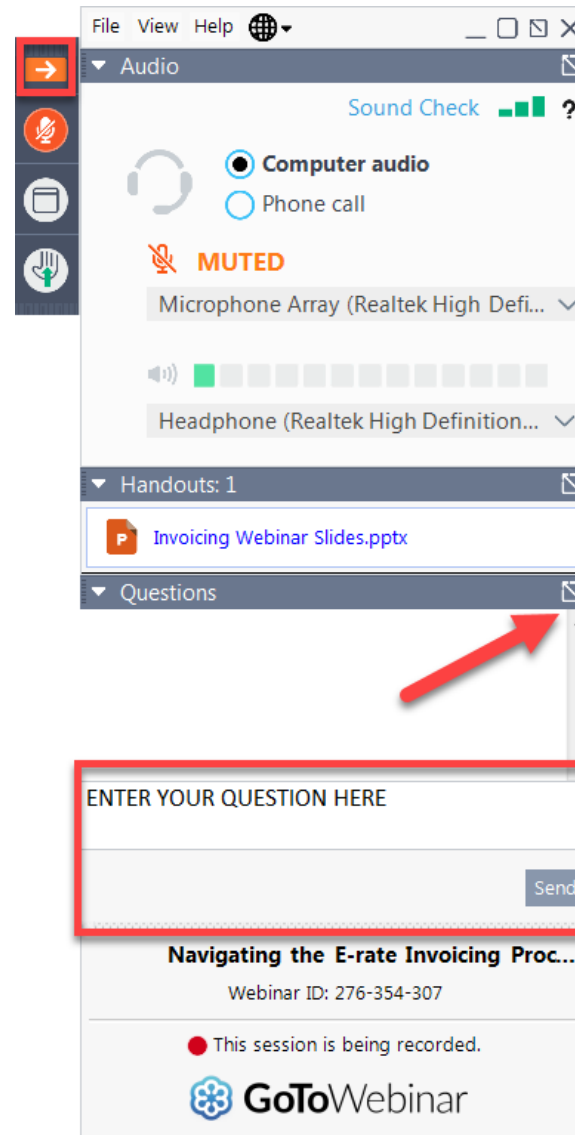
- Service providers file an FCC Form 473 (Service Provider Annual Certification (SPAC) Form) to certify that they will comply with the rules and guidelines of the Schools and Libraries (E-Rate) program.
- A new SPAC Form must be on file for each funding year a service provider participates in the E-Rate program.
- A SPAC Form is required for [Service Provider Identification Number \(SPIN\)/498 ID](#).
- The SPAC Form must be on file with USAC **before** USAC pays an invoice.
- Verify the status of your FCC Form 473 using the [Service Provider Download Tool](#).

Resources

- [E-Rate Service Provider Webinar](#)
- [E-Rate Fall Training: Pre-Commit Process](#)
- [Eligible Services List \(ESL\)](#)

Live Q&A

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



The screenshot shows a webinar control panel with several sections:

- Audio:** Includes a "Sound Check" indicator, "Computer audio" (selected) and "Phone call" options, a "MUTED" status, and dropdown menus for "Microphone Array (Realtek High Defi...)" and "Headphone (Realtek High Definition...)".
- Handouts: 1:** Lists "Invoicing Webinar Slides.pptx".
- Questions:** A section with a red arrow pointing to a box containing the text "ENTER YOUR QUESTION HERE" and a "Send" button.

At the bottom of the panel, it displays the webinar title "Navigating the E-rate Invoicing Proc...", the ID "Webinar ID: 276-354-307", a recording status "This session is being recorded.", and the "GoToWebinar" logo.

Q&A Tips

- ✓ Type your queries into the "Questions" box in your webinar control panel.
- ✓ Write in full sentences.
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Questions?

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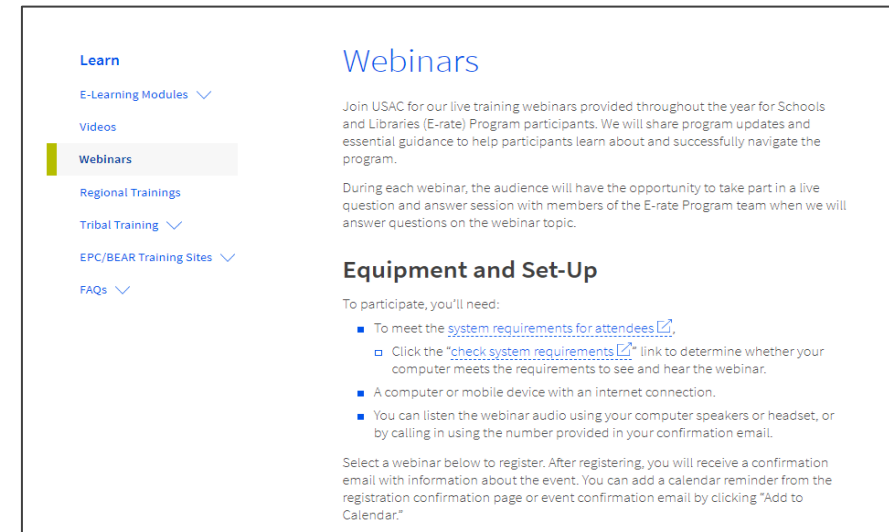


Create a customer service case

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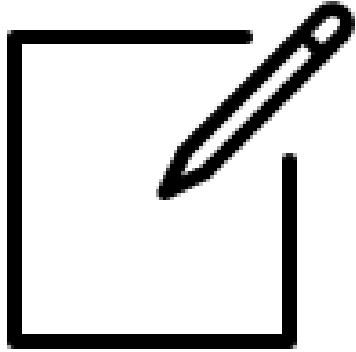
Upcoming Webinars

- Our next webinar is on **June 20, 2024**
- Beginning E-Rate Services Webinar
 - Recommended for applicants and service providers
 - Suitable for all E-Rate experience levels
- Please visit the E-Rate [Webinars](#) page for additional information.



The screenshot shows a webpage with a navigation menu on the left and main content on the right. The navigation menu includes: Learn, E-Learning Modules (with a dropdown arrow), Videos, Webinars (highlighted with a yellow bar), Regional Trainings, Tribal Training (with a dropdown arrow), EPC/BEAR Training Sites (with a dropdown arrow), and FAQs (with a dropdown arrow). The main content area is titled "Webinars" and contains the following text: "Join USAC for our live training webinars provided throughout the year for Schools and Libraries (E-rate) Program participants. We will share program updates and essential guidance to help participants learn about and successfully navigate the program." Below this is a paragraph: "During each webinar, the audience will have the opportunity to take part in a live question and answer session with members of the E-rate Program team when we will answer questions on the webinar topic." The next section is titled "Equipment and Set-Up" and states: "To participate, you'll need:" followed by a list of requirements: "■ To meet the [system requirements for attendees](#)," "□ Click the ["check system requirements"](#) link to determine whether your computer meets the requirements to see and hear the webinar." "■ A computer or mobile device with an internet connection." "■ You can listen the webinar audio using your computer speakers or headset, or by calling in using the number provided in your confirmation email." At the bottom, it says: "Select a webinar below to register. After registering, you will receive a confirmation email with information about the event. You can add a calendar reminder from the registration confirmation page or event confirmation email by clicking "Add to Calendar."

Share Your Thoughts



- We want to hear about your webinar experience.
- A survey will appear on your screen at the end of the webinar.
- If you are not able to complete the survey today, a link to it will be emailed to you within two business days.
- We appreciate your feedback!

Thank You!





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Administrative Co.