



November 2021 RHC Monthly Newsletter

November 5, 2021

Latest News

New! My Portal Platform Update

USAC is excited to share that the platform used to submit the FCC Form 462 (Funding Request Form) is being updated for Funding Year 2022 to improve user experience. The new platform—which is the web-based system used to host the form—will be easier to navigate and will allow RHC program reviewers to approve funding requests faster and more efficiently. Although the platform is changing, the information requested on the FCC Form 462 will not change. **This update currently applies to the FCC Form 462 ONLY**, but over time it will apply to all other forms in both the Healthcare Connect Fund (HCF) and Telecommunications (Telecom) Programs. We will reach out to program participants as the platform grows and post all updates on the [My Portal Platform Update](#) webpage.

Note: If you have already created or submitted a draft of your FCC Form 462 in My Portal, we strongly encourage you to save and download a copy so you do not lose your work, as any drafts in the system will not be migrated to the new platform. View the [Step-by-Step Guide](#) to learn how to save your draft.

The new platform used to submit the FCC Form 462 (Funding Request Form) will be available for you to begin your FY2022 draft forms on November 23, 2021. You will not be able to submit your FCC Form 462 until December 1, 2021 when the FY2022 filing window opens. For more information, please visit USAC's [My Portal Platform Update](#) webpage.

FY2022 Filing Window Opens December 1, 2021 – Register Today for Upcoming Training!

The FY2022 filing window will take place from December 1, 2021 to April 1, 2022. This means that you must submit your funding requests (FCC Forms 462 or 466) as early as December 1, 2021 and no later than 11:59 p.m. ET on April 1, 2022. We highly encourage you to submit your funding requests as early as possible in the filing window. Other forms for FY2022 (FCC Forms 460, 461, or 465) are accepted prior to December 1. Learn more about [filing windows](#).

Join the RHC Program Outreach team in November for the Funding Request Best Practices webinars. These webinars will cover any changes to the forms for FY2022 and include a walkthrough of the FCC Forms 462 and 466 in My Portal. Register below:

- HCF Program FCC Form 462 Best Practices – Wednesday, November 10, 2021 at 2 p.m. ET - [Register](#)
- Telecom Program FCC Form 466 Best Practices – Wednesday, November 17, 2021 at 2 p.m. ET - [Register](#)

New! You're Invited: Supply Chain Audit Webinar – November 9

Beginning in Q1 2022, USAC will conduct audits of compliance with the supply chain rules. If your company is selected for an audit, you will receive an audit announcement letter closer to the start date of the audit that will provide information about the audit and next steps. To help you prepare, USAC will host a supply chain audit webinar on Tuesday, November 9, 2021 from 2 to 3 p.m. ET that highlights how to prepare and what to expect if you are selected for an audit. Visit our [registration page](#) to sign up.

Service providers who participate in multiple Universal Service Fund (USF) programs must also complete these

annual certifications for each other program (i.e., E-rate, High Cost, and Lifeline) in which they participate. For additional information and FCC form due dates, visit USAC's [Supply Chain](#) webpage.

New! PQA Requests for Information Are Going Out

The 2022 Payment Quality Assurance (PQA) assessment program is underway. PQA is a program that assesses Rural Health Care payments made on invoices submitted during the past 12 months to verify that the payments were properly made – in other words, that all program rules were followed correctly when the payment was authorized and disbursed.

The PQA program will choose a certain number of payments from among disbursements made each month, and applicants will need to provide specific documentation – for example, customer bills that support invoices submitted to USAC – to verify that those payments were made correctly. It is important that you maintain proper documentation in order to be able to respond correctly and completely to PQA requests.

USAC will begin sending email notifications in the first and second weeks of November to applicants whose payments have been selected for PQA. Please check your email and respond promptly if you receive an email from USAC's PQA program, which will include the domain name PQA@USACcms.i-sight.com. Also, check your spam folder or junk email folder regularly to see if it contains an email from this domain. This will help expedite your review.

- Do not hesitate to contact your reviewer if you have questions. Contact information is provided in the email.
- Contact your PQA reviewer if you are unable to respond by the deadline.

New! Common Audit Findings

In our continuing efforts to help applicants and service providers, a list of common audit findings in the Telecom Program is provided below. The following information is provided to help you continue to be compliant with RHC program rules throughout the application process and for all post-commitment activity, particularly given the FCC's waiver of use of the rural and urban rate databases for FY2021 and FY2022 in [FCC Order DA 21-394](#). Please keep in mind that per RHC program rules, health care providers (HCPs) and service providers are required to retain records documenting compliance with program rules for at least five years.

Common Audit Findings – Telecom Program:

Rural Rates Not Properly Determined

Potential Errors:

- Rural rate is not calculated in accordance with FCC rules. FY2021 applicants were required to use the most recently approved rate from FY2018, FY2019, or FY2020 under Method 1, 2, or 3 (47 C.F.R. §54.607 (2019)). Rural rates for funding years prior to FY2021 were determined using either Method 1, 2, or 3 without regard to previously approved rates.

Rural Rates not Substantiated

Potential Errors:

- Failure to provide documentation or inadequate documentation provided to support the rural rate. HCPs or service providers that sought FY2021 support should submit documentation showing that the rural rate used was previously approved. The rural rate substantiation requirements for prior funding years remained the same.

Service Provider's Urban Rate Not Substantiated

Potential Errors:

- Failure to provide documentation or inadequate documentation provided to support the urban rate. HCPs that sought FY2021 support were required to use an urban rate approved for the same service at the same facility within the previous three funding years. The means of determining and substantiating urban rates for prior funding years remained unchanged.

Best Practices Three Above Items:

- Maintain adequate documentation to support that the urban and rural rates were previously approved or, in the absence of such rates, how the rates were determined.
- For FY2021 and FY2022 use the [Telecom Program Urban and Rural Rates](#) tip sheet.

The Service Provider Charged the Beneficiary a Rate Higher Than the Urban Rate

Best Practices:

Ensure any policies and procedures that govern the billing of

Telecom Program applicants include a requirement that the applicant be charged no higher than the urban rate.

Telecom Program is Invoiced for Ineligible Services or Equipment

Best Practices:

- Examples of services that **may** be eligible for support can be found on the [Telecom Program Examples of Common Services](#) tip sheet on the USAC website.
- Identify any ineligible services and remove them from your funding request.

Competitive Bidding Process is Not Fair and Open; Inadequate Competitive Bidding Process (47 C.F.R. §54.622).

Best Practices:

- Avoid conflicts of interest by ensuring service providers that plan to bid are not involved in the submission of forms to request service and are not involved in the bid evaluation process.
- FCC Forms 465 must be posted on the USAC public website for a minimum of 28 days before selecting a service provider and signing a contract.
- Documents relating to the competitive bidding process must be retained by the applicant and the service provider for a minimum of five years. Examples include:
 - Copies of all bids received in response to the applicant's request for services;
 - Documentation concerning the applicant's service provider selection criteria and bid evaluation analysis, including documentation showing that the applicant considered all bids submitted and selected the most cost-effective option; and
 - Documentation of communications with all service providers, both bidding and potentially bidding, during the competitive bidding process.

FCC Releases Order 21-1107 Granting Relief to RHC Participants Affected by Hurricane Ida

On September 3, 2021, the FCC released [Order DA 21-1107](#) waiving certain RHC rules and deadlines to assist participants and providers located in the areas affected by Hurricane Ida. This Order applies to healthcare providers and service providers located in all parishes and counties in Louisiana and Mississippi as of the date of release of this Order (September 3, 2021).

This Order grants the following waivers and extensions for all affected RHC program participants:

- Grants a 60-day extension to the deadline for appeals and requests for waiver for all USAC decisions dated August 30, 2021 through January 31, 2022
- Waives the 14-day Information Request response deadline for Information Requests related to funding requests, appeals and waivers, invoices, audits and other documentation, and applies to all funding year for which those requests relate. Information Request responses subject to the waiver are now due on or before January 31, 2022.
- Waives the September 30, 2021 deadline for HCF Program consortia annual reports, which are due on or before January 31, 2022.
- Waives the requirement that HCPs and service providers retain for five years documentation relating to RHC program participation, but only to the extent such documentation was destroyed by Hurricane Ida.

FCC Announces Increase in Rural Health Care Program Cap for FY2021

On June 23, 2021, the FCC Wireline Competition Bureau directed USAC to carry forward up to \$379.97 million in unused funds from prior funding years to the extent necessary to satisfy FY2021 demand for the Rural Health Care program. For additional details, read [Public Notice DA 21-742](#).

USAC Releases FY2021 Funding Decisions Beginning in July

USAC began delivering decisions on FY2021 funding requests in July, five weeks after the close of the FY2021 filing window. RHC will continue to deliver funding decisions on a rolling basis until all funding requests have been reviewed. Due to the demand for RHC program funds, there will not be a second filing window for FY2021. The RHC program will not accept additional funding requests beyond those submitted in the filing window.

Important Reminders

FY2020 Invoicing Deadline Reminder

As a reminder, [FCC Order DA 21-394](#) granted an automatic 120-day extension of the HCF and Telecom Program invoice filing deadline for FY2020 funding decisions. The 120-day extension only applies to FY2020 funding decisions with an original invoice deadline of October 28, 2021. This automatic extension will be applied to all FY2020 Funding Request Numbers (FRNs). With this extension, the new invoice filing deadline for HCF and Telecom Program FY2020 commitments will be February 25, 2022. More information will be coming soon. Please check the [HCF](#) and [Telecom](#) Program invoicing webpages for additional information or visit the [Rural Health Care Commitments and Disbursements \(FCC Forms 462/466/466A\)](#) webpage on the [USAC Open Data](#) platform to search by FRN.

Submit Your FY2022 Requests for Services

July 1, 2021 was the first day that RHC program applicants could submit their FCC Forms 461 and 465 to initiate competitive bidding for FY2022, five months before the opening of the FY2022 funding request filing window. The FY2022 funding request filing window will open on December 1, 2021 and close on April 1, 2022. Find additional program dates and deadlines on the [FY2022 Program Calendar](#). We highly encourage you to submit your forms as early as possible in preparation for the upcoming FY2022 filing window.

Learn about best practices for FY2022 as well as the FCC Forms 461 and 465 competitive bidding process on the [RHC Webinars](#) webpage.

What To Do If You Receive an Information Request

Any eligibility, request for services, funding request, and invoicing forms submitted with incomplete or missing documentation cannot be processed, and RHC reviewers will reach out to all account holders (the primary and all secondary and tertiary account holders associated with that HCP) with a request for additional information (Information Request). Information Requests are sent to collect any missing documentation, address deficiencies, or to ask clarifying questions about the FCC Form.

Due to [FCC Order DA 21-394](#), applicants who receive Information Requests between April 8, 2021 and December 31, 2021 may request a 28-day extension of this deadline, but must do so before the 14-day deadline in the Information Request. An applicant with a 28-day extension will have a total of 42 calendar days to respond to the information request. **If you receive an Information Request, you must respond to it or request an extension within 14 calendar days. Failure to respond or request an extension within the 14 calendar days will result in a denial of funding, so be sure to meet that deadline. If you need to request an extension, please do so as soon as possible.**

Information Request Tips for the Telecom Program

- Applicants can receive Telecom Program Information Requests through My Portal or by email
 - For Information Requests received through My Portal, applicants should respond through My Portal only
 - For Information Requests received by email, applicants should “Reply All” to respond to the Information Request by email
- Use only Chrome or Firefox internet browsers when using My Portal
- When uploading a document as a response, the document should be limited to 10MB and its file name should not contain any special characters, only letters and numbers

Information Request Tips for the HCF Program

- Applicants that receive HCF Program Information Requests through email should “Reply All” to respond to an Information Request by email

Do You Need to Make Changes to a Commitment After Your Funding is Approved?

If you have a Funding Commitment Letter (FCL) please keep in mind that it is your responsibility to confirm that the information contained therein is accurate. You may need to contact USAC to request changes to your site or services if you encounter any of the below circumstances:

- If the address of your site changes, or the primary account holder no longer works for the HCP, you must submit an FCC Form 460 revision for HCF or a new FCC Form 465 for Telecom within 30 days of the change. The 30-day requirement applies at all points during the funding lifecycle including all post-commitment activities.
- If you will not be using all of your approved funds, you can request a decrease in your funding request by sending an email to RHC-Invoicing@usac.org. Please be sure to include your HCP name and number, the

affected Funding Request Number (FRN), and the amount by which you would like to reduce the commitment. USAC will complete a partial de-commitment for the FRN in that amount.

- In the Telecom Program, you can revise your approved FRN prior to invoicing using the FCC Form 467. If you have already submitted the FCC Form 467 and you need to make another change, you can submit an [FCC Form 467](#) revision prior to invoicing.
- If you'd like to re-allocate funds within your FRN, you can submit a site and service substitution. Learn more about [site and service substitutions](#).
- If you will not be using any of the funds in your approved or disbursed funding commitment, you can return the approved and disbursed funds to USAC. Learn more about [voluntary return of funds](#).

Certifications Requirements for National Supply Chain

As a reminder, when service providers log in to My Portal, they will see two new Supply Chain certifications included in the FCC Form 463 and Telecom Program invoice.

The first certification affirms compliance with the CFR 47 [Section 54.9 prohibition](#) on USF support to purchase, obtain, maintain, improve, modify, operate, manage, or otherwise support equipment or services produced or provided by the covered companies deemed to pose a national security threat to the integrity of the communications network or communications supply chain. Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, and Dahua Technology Company, and their parents, affiliates, and subsidiaries, are the five companies that have been officially designated as such threats by the FCC and placed on the Covered List. The second certification affirms compliance with CFR 47 [Section 54.10](#), which prohibits the use of any Federal subsidies on any communications equipment and services on the [Covered List](#).

- FY2020 Applicants: If you requested services or equipment that contain components of products produced by any company on the Covered List, or any of their parents, affiliates and subsidiaries in FY2020, you cannot invoice for these funds. Instead, you should immediately submit a [service substitution](#) prior to invoicing to ensure complete program compliance.
- FY2021 Applicants: If you identify the use of covered equipment/services on your submitted funding request form, please email RHC-Assist.org with your FRN number. We will work with you to take corrective action to ensure compliance.
- FY2022 Applicants: As you proceed with competitive bidding, please ensure you are not requesting funding for services or equipment from any company on the [Covered List](#), or any of their parents, affiliates and subsidiaries.

USAC updated the [Supply Chain](#) webpages to include three new subpages: [COVID-19 Broadband Programs](#), [Audits](#), and [FAQs](#).

Need Help? Contact Us!

For questions about the Rural Health Care program, call the RHC Help Desk Call at 800-453-1546 or email RHC-Assist@usac.org.

The information contained in this electronic communication and any attachments and links to websites are intended for the exclusive use of the addressee(s) and may contain confidential or privileged information. If you are not the intended recipient, or the person responsible for delivering this communication to the intended recipient, be advised you have received this communication in error and that any use, dissemination, forwarding, printing, or copying is strictly prohibited. Please notify the sender immediately and destroy all copies of this communication and any attachments.