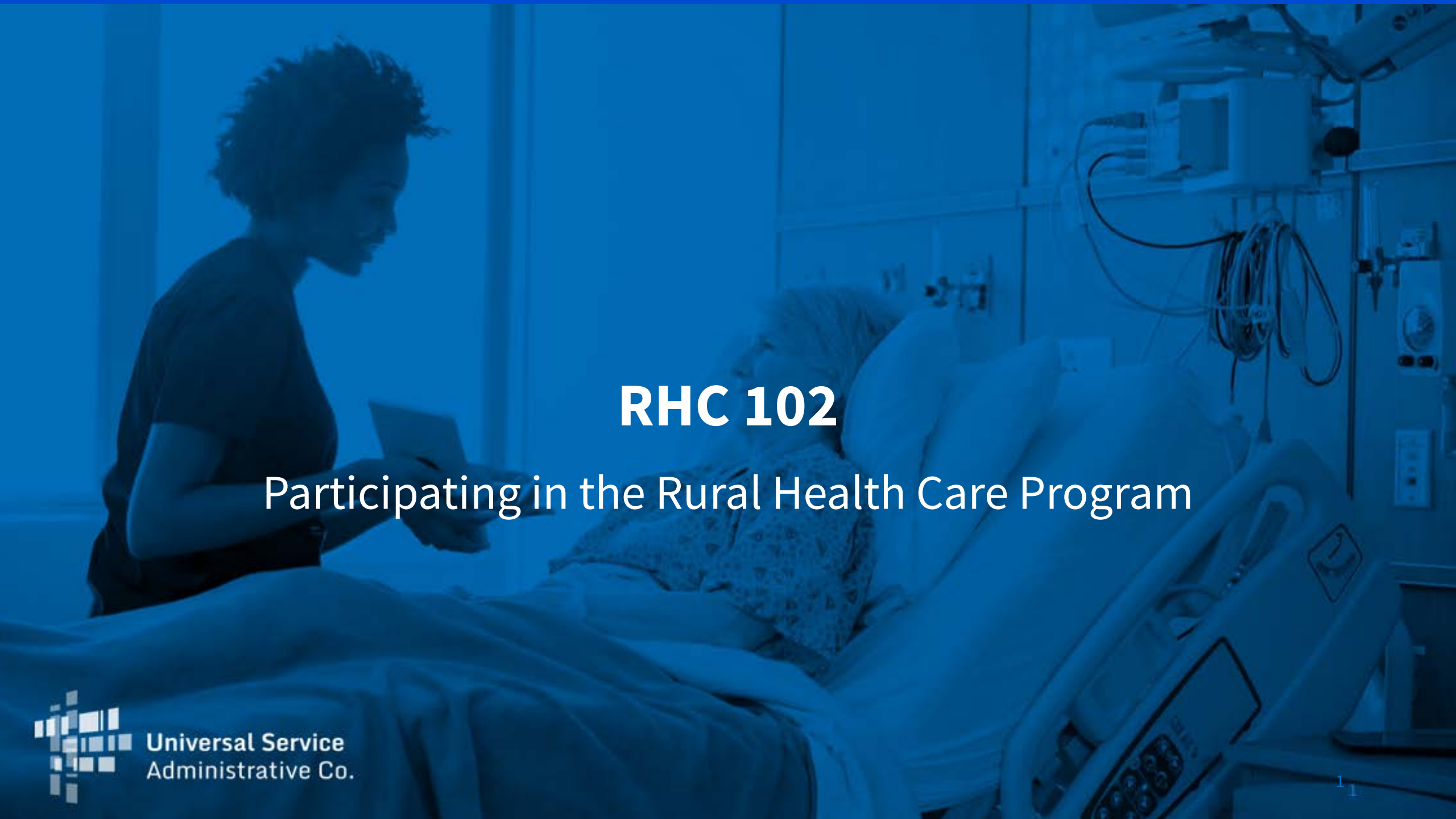


RHC 102

Participating in the Rural Health Care Program

Universal Service Administrative Co.

Housekeeping

- Use the “Audio” section of your control panel to select an audio source and connect to sound
  - Turn on your computer’s speakers, or
  - Use the call-in instructions in your confirmation email
- All participants are on mute
- Submit questions at any time using the “Questions” box
- Slides attached to GoToWebinar Panel and posted to the webinars web page

Today's Presenters

Annabeth Wonch
Senior Program Manager, RHC Outreach

Jennifer Contreras
Senior Program Manager, RHC Outreach

Agenda

1. FY2019 Overview
2. Managing Account Holders
3. Authorizations
4. Best Practices Before Form Submission
5. Best Practices After Form Submission
6. Resources

FY2019 Overview

RHC 102

Overview of the RHC Program

- The RHC Program provides discounts for telecommunications and broadband services to *eligible* health care providers (HCPs).
- The RHC Program is authorized by the Federal Communications Commission (FCC) to commit up to $581M in funding for funding year (FY) 2018 (July 1, 2018 – June 30, 2019) and adjusts for inflation every year.
  - FCC Order 18-82 released June 25, 2018 raised the RHC Program funding cap from $400M.
  - The funding cap includes administrative expenses for the Universal Service Administrative Company (USAC) to administer the RHC Program each funding year.
- Read the RHC Program Rules and Order for complete information.

The Two Components of the RHC Program

There are two "sub programs" of the RHC Program:

1. **Healthcare Connect Fund (HCF) Program**
   - Supports broadband connectivity and broadband networks for eligible HCPs
   - Eligible services and equipment receive a 65% discount
2. **Telecommunications (Telecom) Program**
   - Funds urban/rural rate difference for eligible telecommunications services for eligible HCPs
   - Remained in place after adoption of the HCF Program

Glossary

Acronym	Meaning
FCC	Federal Communications Commission
HCF	Healthcare Connect Fund
FY	Funding Year
HCP	Health Care Provider (your site)
HCP Number	Number associated with your site
PAH	Primary Account Holder
FRN	Funding Request Number
LOA	Letter of Agency (HCF Program Only)
TPA	Third Party Authorization
ACSD	Allowable Contract Selection Date

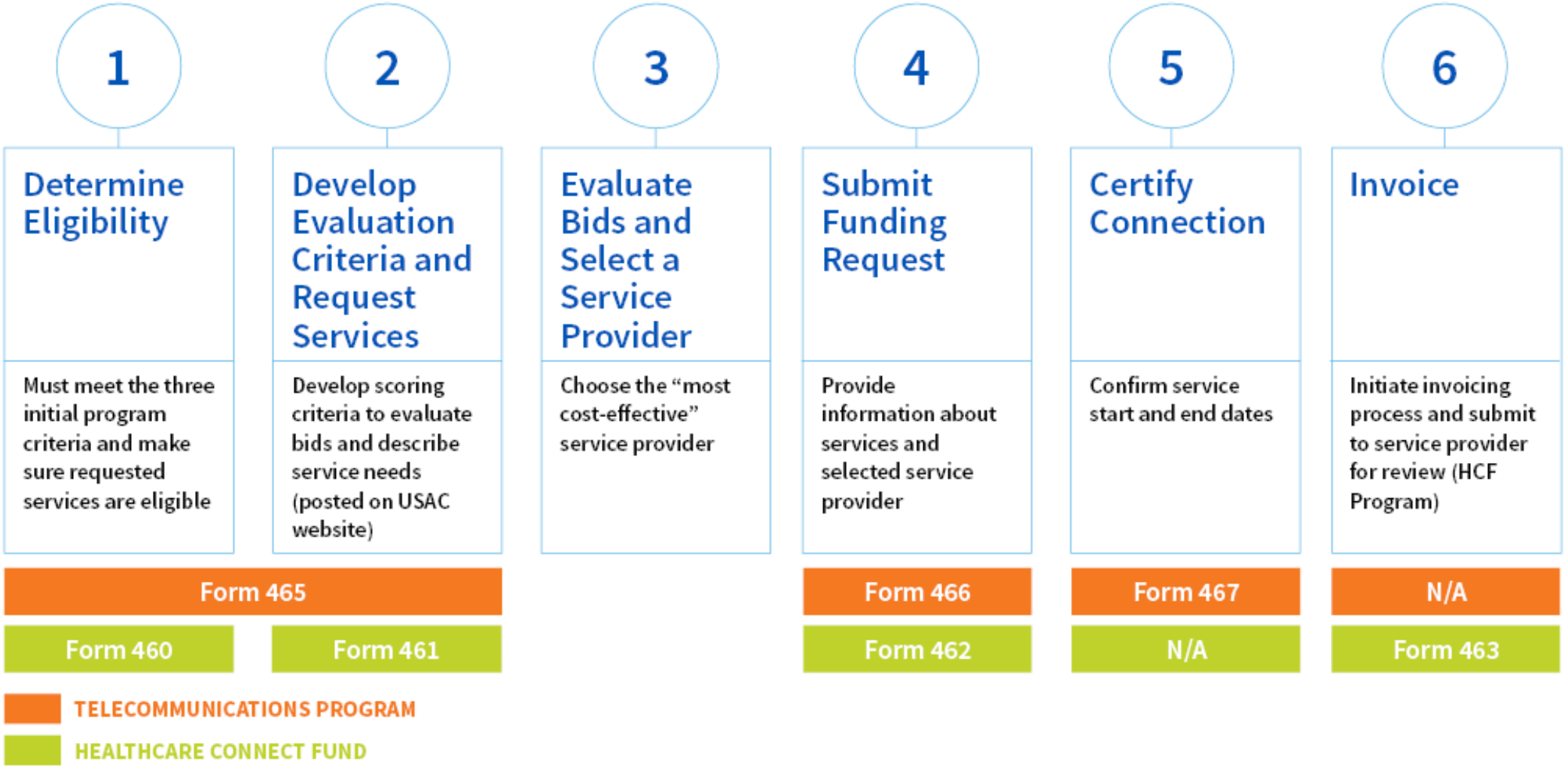
Three Criteria for Eligibility

1. Status
   - Not for Profit
   - Public
2. HCP Type
3. Rural Location
   - Telecom Program: HCP applicants must be located in an FCC-approved rural location to be considered rural.
   - HCF Program: Individual HCP applicants must be located in an FCC-approved rural location to be considered rural. Non-rural HCP applicants may apply as part of a majority-rural consortium.
   - Use the rural look-up tool on the USAC website.

Each HCP site or location is considered an individual HCP for purposes of calculating support under the RHC Program. Each site must demonstrate that, *by itself,* it is an eligible entity.

Rural Healthcare Program

Application Process

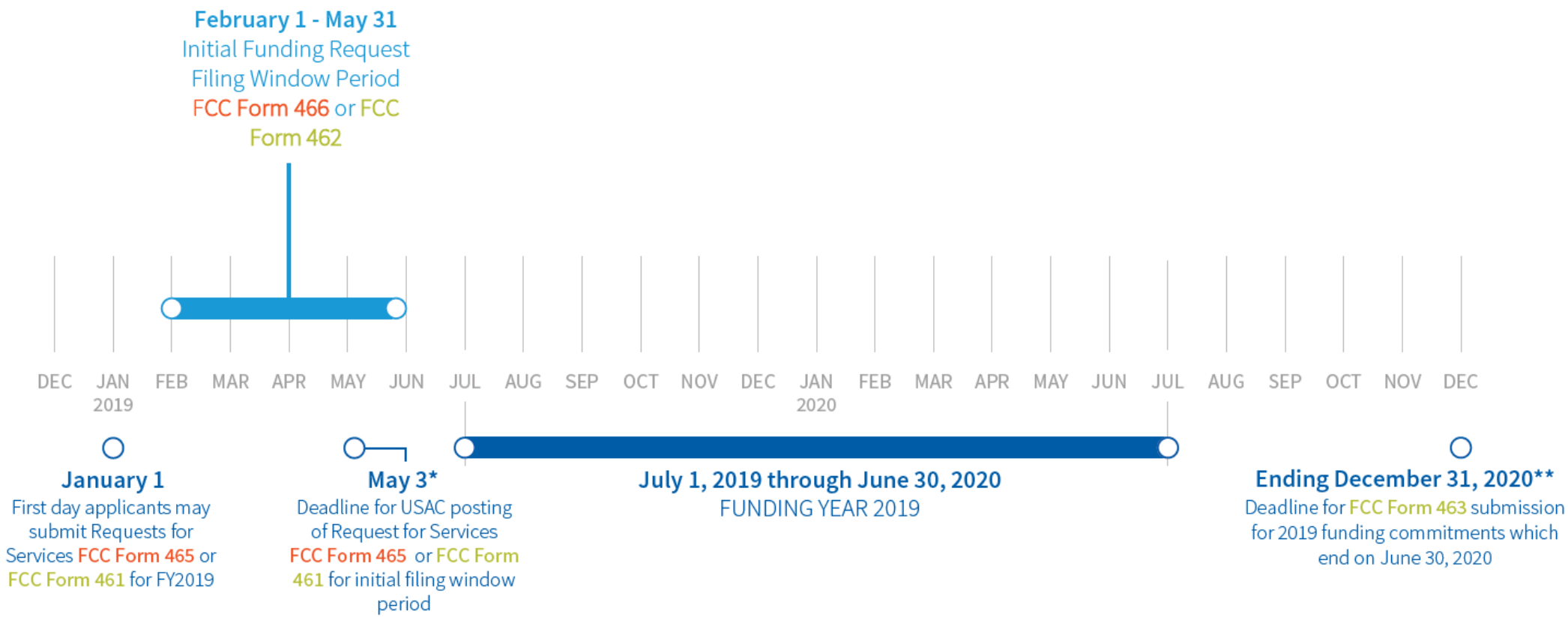


RHC Program: Funding Years & Filing Window Periods

- **Funding Year**
  - From July 1 to June 30 of the subsequent calendar year
  - FY2019 = July 1, 2019 to June 30, 2020
- **Filing Window Periods**
  - A fixed period during which all qualifying funding requests that are received during a filing window period are treated as having been filed simultaneously for purposes of making funding commitment decisions.
  - Each funding year can have multiple filing window periods.
  - FY2019 Filing Window Period is February 1 – 11:59 p.m. ET May 31

FUNDING YEAR (FY) 2019

FILING CALENDAR



*Applicants should allow for processing time between their submission and USAC posting of the form. by this day

. **An invoice must be submitted to the service provider and approved by the deadline.

HCF Program

Recommended Last Day to Submit for Individual HCPs *NOT* using a Request for Proposal (RFP)

HCF Program Form	Last Day to Submit
FCC Form 460 (Eligibility)	**March 14, 2019** Recommended Date
FCC Form 461 (Request for Services)	**April 15, 2019** Recommended Date
FCC Form 462 (Funding Request)	**May 31, 2019** ***Deadline to Submit**

Please note that these dates (*with the exception of the FCC Form 462 window close deadline of May 31) are not deadlines enforced by the HCF Order, but rather suggested milestones to meet the close of the window.

HCF Program

Recommended Last Day to Submit for Individual HCPs using a Request for Proposal (RFP)

HCF Program Form	Last Day to Submit
FCC Form 460 (Eligibility)	**March 14, 2019** Recommended Date
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FCC Form 462 (Funding Request)	**May 31, 2019** ***Deadline to Submit**

Please note that these dates (*with the exception of the FCC Form 462 window close deadline of May 31) are not deadlines enforced by the HCF Order, but rather suggested milestones to meet the close of the window.

Telecom Program

Earliest and Last Dates To Submit for Request for Services & Funding Request

Telecom Program Form	First Day to Submit	Last Day to Submit
FCC Form 465 **(Eligibility & Request for Services)**	**January 1, 2019** Earliest Date to Submit to Request Services	**April 15, 2019** Recommended Date
FCC Form 466 **(Funding Request)**	**February 1, 2019** Earliest Date to Submit	**May 31, 2019** *Deadline to Submit

Please note that these dates (*with the exception of the FCC Form 466 window close deadline of May 31) are not deadlines enforced by the HCF Order, but rather suggested milestones to meet the close of the window.

Questions?

Managing Account Holders

RHC 102

Three Types of Account Holders

1. Primary Account Holder (PAH)

- Must work for the legal entity of the HCP
- Responsible for the accuracy of information submitted to USAC
- Can only be one individual
- Mandatory for every HCP

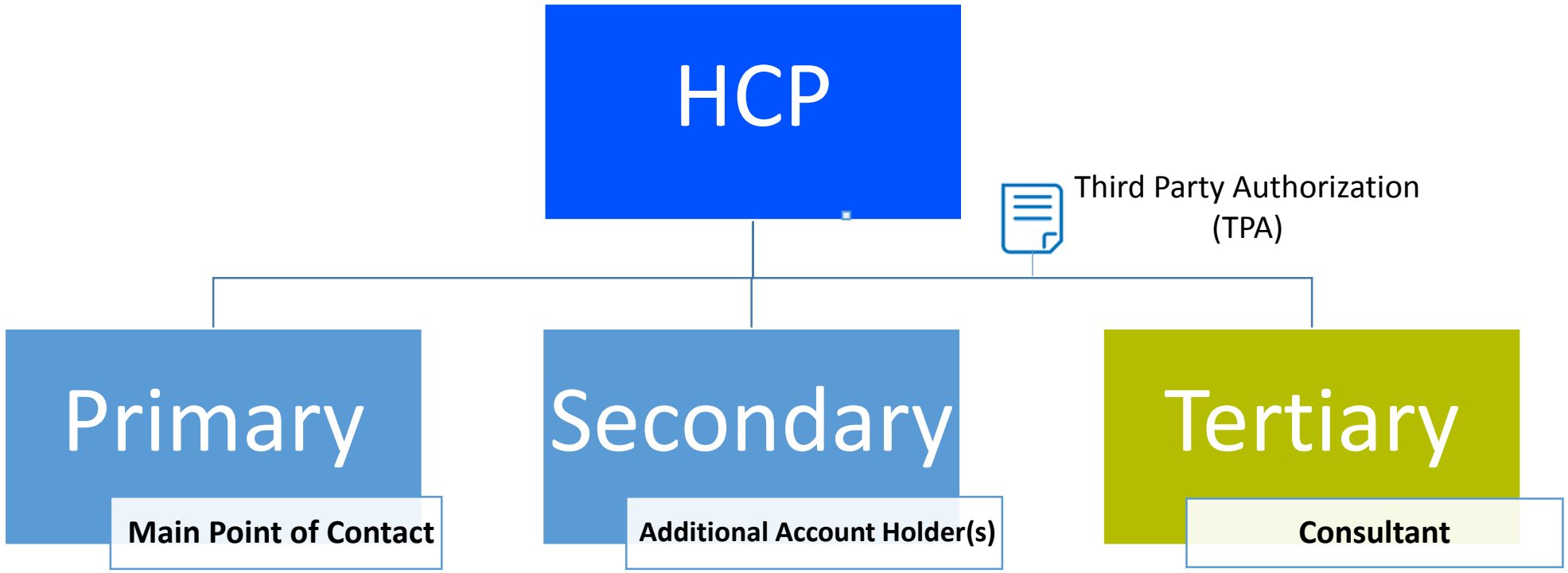
2. Secondary Account Holder

- Must work for the legal entity of the HCP
- Responsible for the accuracy of information submitted to USAC
- “Back up” for PAH
- Can have multiple secondary account holders for one HCP

3. Tertiary

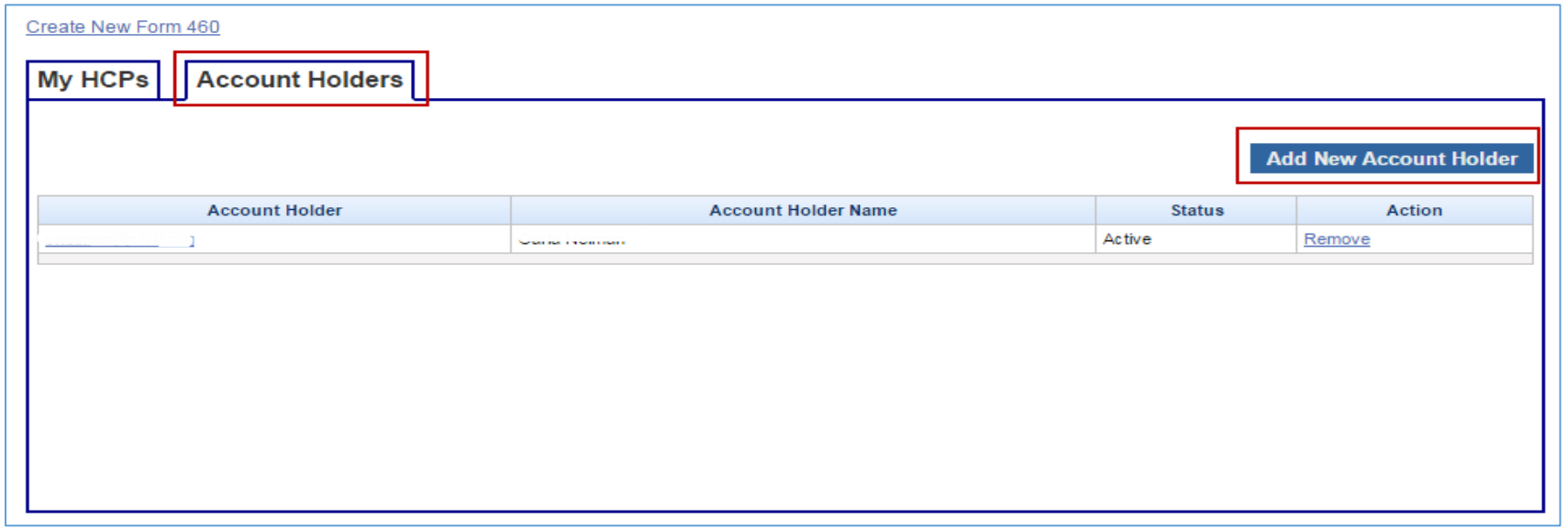
- Hired by HCP to file forms on behalf of the HCP (e.g., consultants)
- Must have a valid Third Party Authorization (TPA)

Types of Account Holder Rights

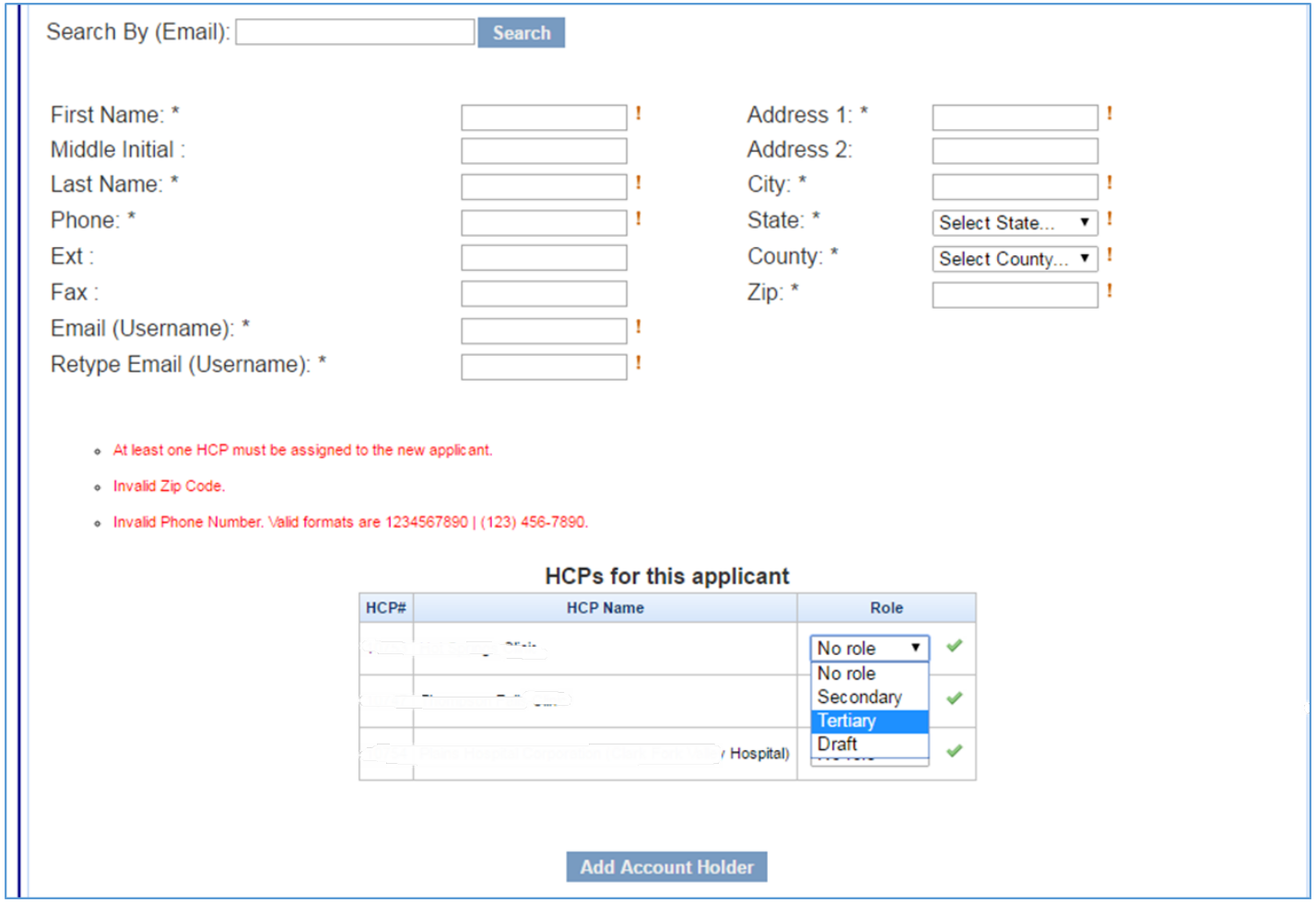


Primary Account Holder – HCF Program

- In HCF, the primary account holder has the ability to manage other account holders in the Account Holders tab of My Portal.



Primary Account Holder – HCF Program

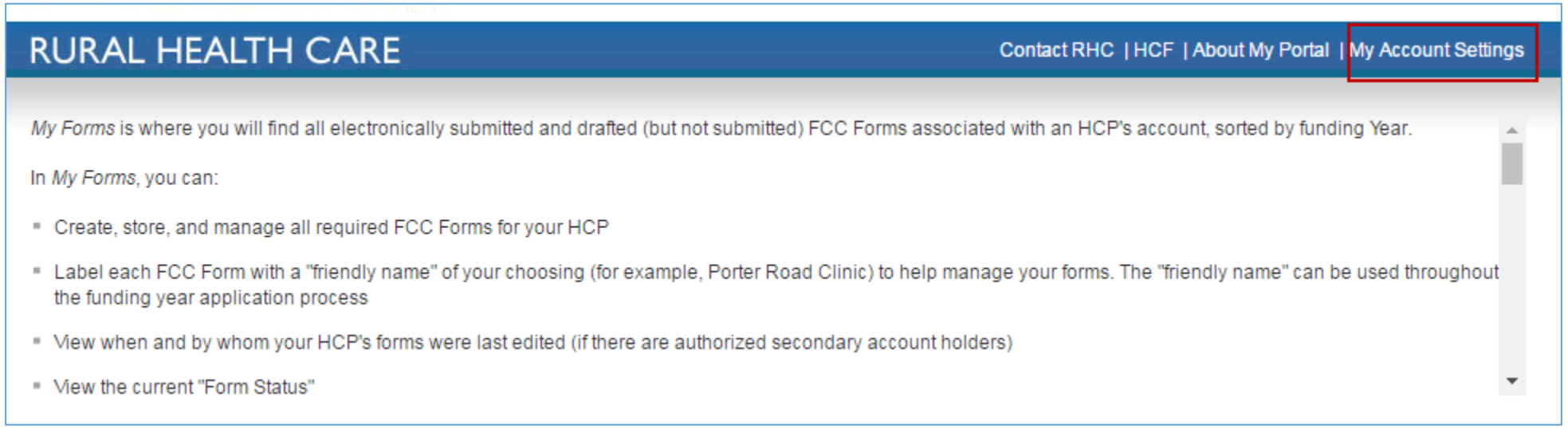


Third Party Authorizations (TPAs)

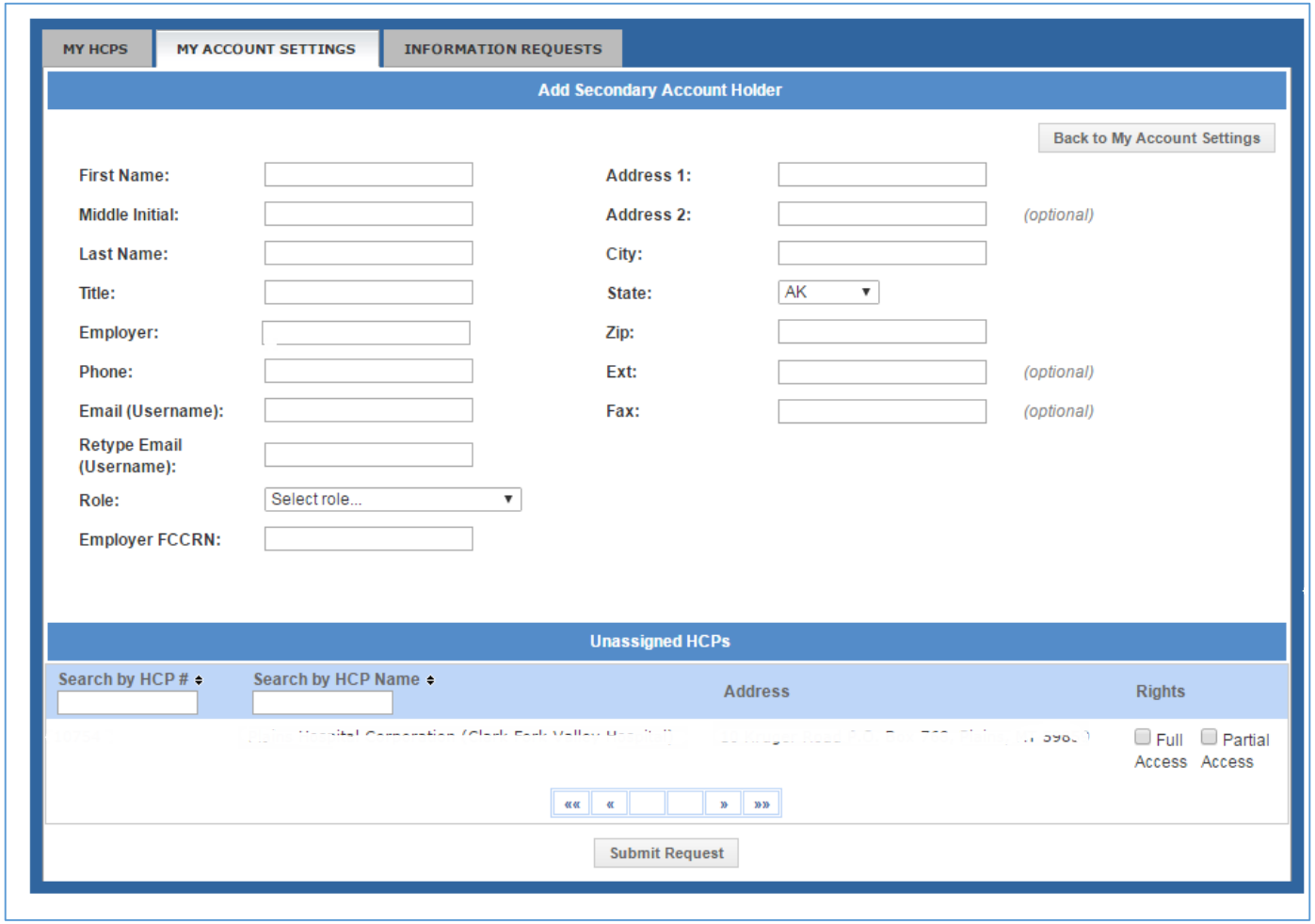
- Provides written authorization to a third party/consultant to complete and submit forms on behalf of the HCP or consortium.
- Download a sample TPA here.

Primary Account Holder – Telecom Program

- In Telecom, the primary account holder has the ability to add/remove other account holders in My Account Settings of My Portal.



Primary Account Holder – Telecom Program



Consultant Account Holder Rights

- Consultants must have tertiary rights in the HCF Program.
- Consultants must have secondary rights in the Telecom Program.
- Consultants gain account holder rights through a Third Party Authorization (TPA)
  - The TPA can be uploaded to an FCC Form 460 or 465 before submission, or added by the primary account holder in My Portal.
  - Information and a sample template for the TPA can be found on our website.

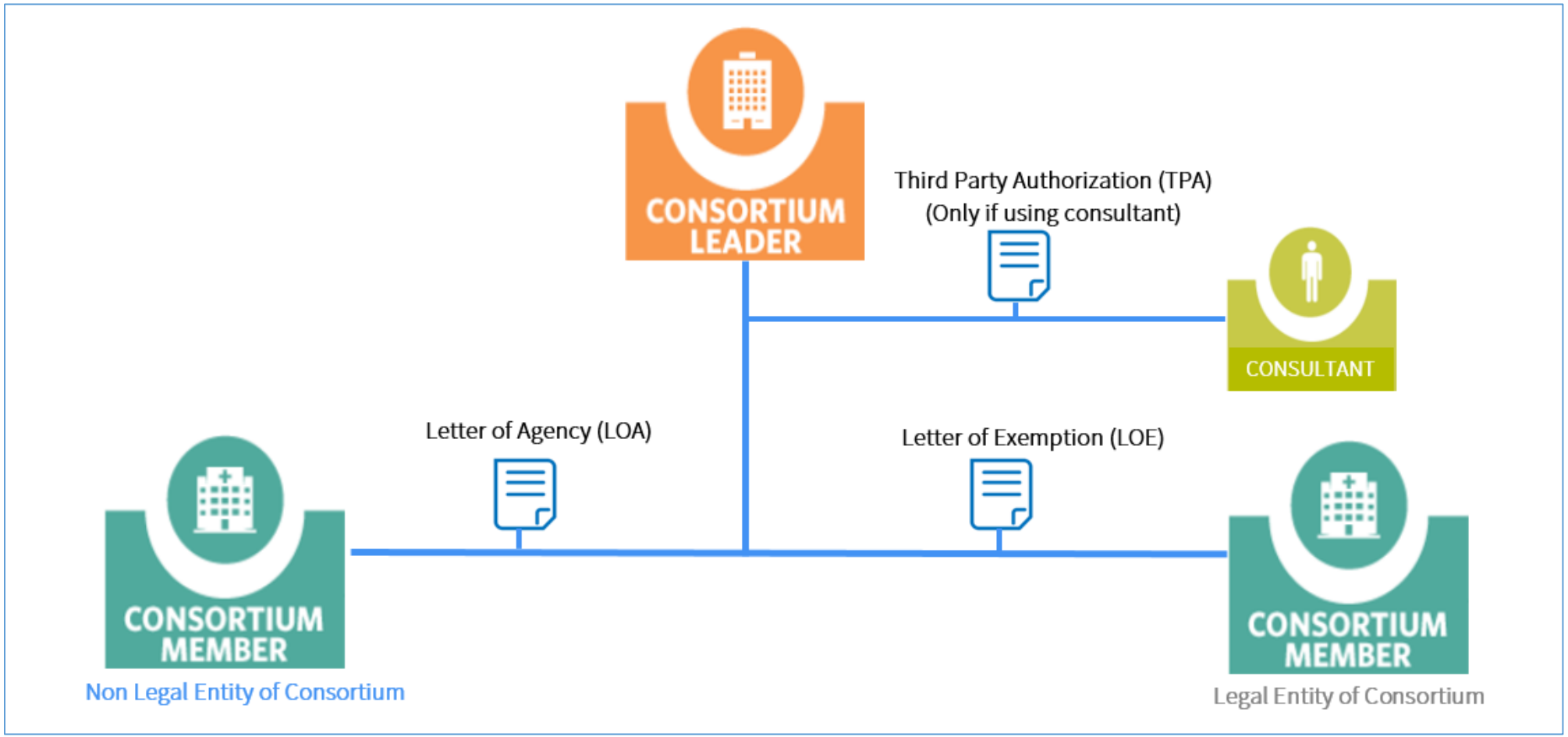
Questions?

Authorizations

RHC 102

HCF Authorizations

- **Third Party Authorizations (TPA):** Provides written authorization to a third party/consultant to complete and submit forms on behalf of the HCP.
- **Letter of Agency (LOA):** Provides written authorization to the consortium project coordinator to act on behalf of each participating HCP within the consortium.
  - This is mandatory for HCP member sites not owned and operated by the consortium
- **Letter of Exemption (LOE):** Provides written authorization to the consortium project coordinator to file forms for sites that are owned and operated by the consortium.



- More information such as requirements, recommendations, and submission guides found here.

Authorizations for FY2019

- In order to be considered eligible for funding in FY2019, Letters of Agency (LOA) and Third Party Authorizations (TPA) must be up to date through FY2019, at a minimum.
- Before submitting a form, please check to ensure authorization documents are up to date.
  - FCC Forms 462 and 466 submitted with expired LOAs or TPAs will result in applicants receiving Information Requests.
- Download a Sample TPA or Sample LOA.
- For more information about submitting LOAs, please see the submission guide.

HCF Program - Consortium FCC Form 461 & LOA

- When filing a consortium FCC Form 461, you should make sure the FCC Forms 460 and LOAs for all member sites have been approved before filing the consortium FCC Form 461.
- Once the FCC Form 461 is filed, you will not be able to link sites to that FCC Form 461 that are later added to the consortium.

Questions?

Best Practices Before Form Submission

RHC 102

Before You Submit a Funding Request

- Make sure you are familiar with the Request for Services (FCC Form 461/465) process.
  - Request for Services (FCC Form 461/465) webinar and tip sheet
- Once a Request for Services is posted, service providers have 28 days to send their bids to the applicant
  - The applicant and service provider may not enter into an agreement to purchase services until the 28 days is over.
  - After the 28 days is complete, the HCP and service provider are welcome to sign a contract. This date is called the Allowable Contract Selection Date (ACSD).
- Ensure you went through a fair and open competitive bidding process unless you are exempt.

Competitive Bidding

- The purpose of competitive bidding is to allow all service providers an equal opportunity to understand your service requirements and offer the most cost-effective solution to address those needs.
- Program rules require that the competitive bidding process be “fair and open.”
- Service providers who plan to bid cannot also simultaneously help you choose a winning bidder or participate in the vendor selection process in any way.
- All potential bidders and service providers must have access to the same information about the service needs and must be treated in the same manner throughout the bidding and vendor selection process.

FCC Form 462/466 Funding Request Submission Checklist

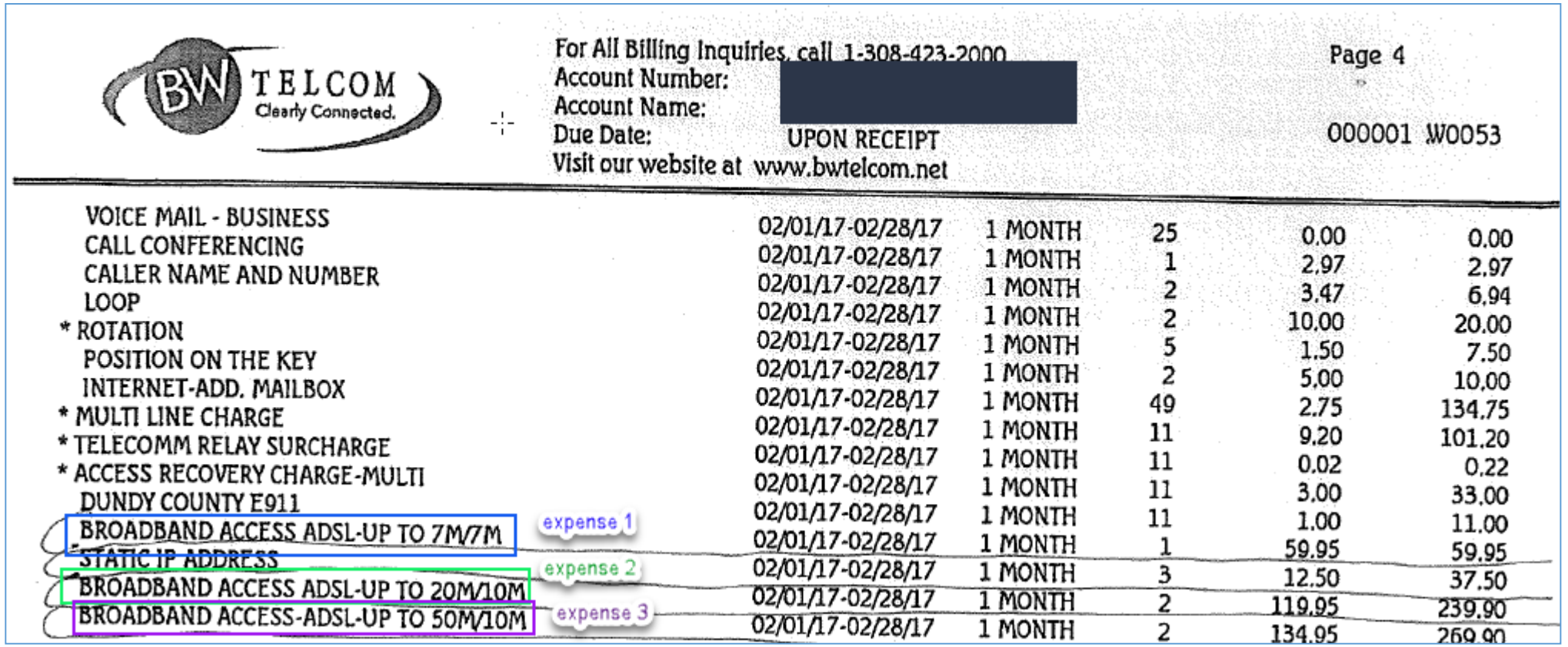
- ❑ Access to My Portal.
- ❑ Document(s) confirming the monthly cost for your services (e.g., a copy of your bill dated within the requested funding period) or the most current bill available before the filing window closes and the next funding year opens.
- ❑ A scanned copy of all bids that were received for your request for services including the winning bid, all bids that were rejected, and any bids that were disqualified and why.
- ❑ A scanned copy of the bidding evaluation matrix.
- ❑ A scanned copy of any new contract signed for your services.
- ❑ Contact information for:
  - ❑ Service provider
  - ❑ All responsible Account Holders
- ❑ The start and end location of your services.
- ❑ A scanned copy of urban rate documentation (Telecom Program only)
- ❑ Rural rate documentation from the service provider supporting the rural rate rule (Telecom Program only)

*** Any information that cannot be located in the submitted supporting documentation will result in an Information Request.**

Funding Request Submission Tips

- It is helpful to also submit a cover letter that includes a summary of your submission.
- Recommended things to include in your cover letter:
  - Where to find information about your circuit in the supporting documentation (i.e. Ethernet 20M - $XX.XX – Page 5 of Invoice)
  - Highlight/label any documentation that is submitted
- Information that is not clearly identified via supporting documentation will need to be confirmed from the service provider.
  - It is the HCP's responsibility to reach out to the service provider to get any missing information. USAC cannot reach out to the service provider on an HCP's behalf.

Identifying Applicable Charges on a Bill/Invoice - Example



BW TELCOM
Clearly Connected.

For All Billing Inquiries, call 1-308-423-2000
Account Number: [redacted]
Account Name:
Due Date: UPON RECEIPT
Visit our website at www.bwtelcom.net

Page 4

000001 W0053

VOICE MAIL - BUSINESS	02/01/17-02/28/17	1 MONTH	25	0.00	0.00
CALL CONFERENCING	02/01/17-02/28/17	1 MONTH	1	2.97	2.97
CALLER NAME AND NUMBER	02/01/17-02/28/17	1 MONTH	2	3.47	6.94
LOOP	02/01/17-02/28/17	1 MONTH	2	10.00	20.00
* ROTATION	02/01/17-02/28/17	1 MONTH	5	1.50	7.50
POSITION ON THE KEY	02/01/17-02/28/17	1 MONTH	2	5.00	10.00
INTERNET-ADD. MAILBOX	02/01/17-02/28/17	1 MONTH	49	2.75	134.75
* MULTI LINE CHARGE	02/01/17-02/28/17	1 MONTH	11	9.20	101.20
* TELECOMM RELAY SURCHARGE	02/01/17-02/28/17	1 MONTH	11	0.02	0.22
* ACCESS RECOVERY CHARGE-MULTI	02/01/17-02/28/17	1 MONTH	11	3.00	33.00
DUNDY COUNTY E911	02/01/17-02/28/17	1 MONTH	11	1.00	11.00
BROADBAND ACCESS ADSL-UP TO 7M/7M (expense 1)	02/01/17-02/28/17	1 MONTH	1	59.95	59.95
STATIC IP ADDRESS	02/01/17-02/28/17	1 MONTH	3	12.50	37.50
BROADBAND ACCESS ADSL-UP TO 20M/10M (expense 2)	02/01/17-02/28/17	1 MONTH	2	119.95	239.90
BROADBAND ACCESS-ADSL-UP TO 50M/10M (expense 3)	02/01/17-02/28/17	1 MONTH	2	134.95	269.90

Telecom Program - Rural Rate Key Points

- Submitted documentation must show that the rural rate provided is compliant with the rural rate rule (47 CFR § 54.607).
- Please bear in mind that these methods must be applied sequentially, e.g., begin with Method 1. If the rural rate cannot be determined using Method 1, move on to Method 2, and so on.
- There are 3 methods that can be used to derive the rural rate:
  - **Method 1** – The rural rate is based on the average of actual rates the service provider charges to other commercial customers in the same rural area as the HCP who are NOT healthcare providers for the same or similar services. **Documentation showing the rates charged to other commercial customers may be a bill, invoice, or contract.**
  - **Method 2** – The rural rate is the average of tariffed and other publicly available rates charged by other service providers to commercial customers, who are NOT healthcare providers, for the same or similar services in that rural area. Method 2 may be used only if the service provider does not provide the same or similar service to a commercial customer who is NOT a healthcare provider in this rural area. **Documentation may include tariffed or other publicly available rates (e.g., rates posted on service provider's website or rate cards).**
  - **Method 3** – This method is straightforward and may only be used if Methods 1 or 2 cannot be used. "If there are no such tariffed or publicly available rates, or the carrier "reasonably determines that this method for calculating the rural rate is unfair," the carrier must submit its rural rates to the state commission (for intrastate rates) or the FCC (for interstate rates) for approval." **Applicant must submit proof that rate was submitted to state commission or FCC before the Form 466 is filed.**

Telecom Program - Urban Rate Key Points (47 CFR § 54.605)

- Submitted documentation must show that the urban rate provided is compliant with the urban rate rule (47 CFR § 54.605).
- Urban rate must not be “higher than the highest tariffed or **publicly-available** rate charged to a commercial customer for a functionally similar service….”
- Urban rate must be derived using a rate for a “functionally similar” service, i.e., must be a rate for a complete circuit, not simply a portion of the circuit, and similar in symmetry/asymmetry.
- Urban rate must be a tariffed or other publicly available rate in any city with a population of 50,000 more in the same state as the HCP is located.
- Safe harbor rates are available on our website for bandwidths up to 50 mbps.

Telecom Program – Rural Rate Key Points For Service Providers

- Your customer will not have the information needed to document that the rural rate on the Form 466 is compliant with the rule.
- The process of determining the rural rate should begin before you submit a bid in response to the FCC Form 465 (Request for Services).
  - You should determine which method you will be using to support the rural rate and prepare the necessary information for the HCP to include with the Form 466 funding application.
  - If using Method 3, you should have submitted your rural rate request to the state commission (intrastate rate) or FCC (interstate rate) for approval.
- Please be sure that the correct contact person is on the Form 498 so that Information Requests that require the service provider's input are received in a timely manner.
- Be sure to copy everyone on the email with your response and be mindful of deadlines.
- If you deem the information provided to USAC as confidential, please mark it clearly as confidential in the subject line and request confidentiality pursuant to the Commission's rules at 47 CFR § 0.459 You do not need to include other individuals on your response and submission, if requesting confidentiality pursuant to the Commission's rules.

Questions?

Best Practices After Form Submission

RHC 102

Information Requests

- Forms with missing or incomplete information or documentation cannot be processed.
- Account holders will receive an **Information Request** when required information cannot be located in the submitted supporting documentation.
- All account holders will receive all Information Requests.
- Applicants are given 14 calendar days to provide a response to the Information Request.
  - 11:59 p.m. EST on the 14th day would be the last time to respond to the Information Request.
- Information Requests not responded to within 14 calendar days **will result in a denial** of that form.

Communicating with Your Service Provider

- Ensure your service provider is aware of all the documentation needed for future steps in the application process.
  - E.g., Urban/Rural Rate documentation (Telecom Program).
- Include language in your bid documentation that confirms your service provider will be compliant with all RHC Program rules and FCC Orders.
- Include your service provider when you reply to Information Requests via email.

Documentation Retention

- Documentation must be retained five years from the end of the funding year (Telecom Program) and for at least five years after the last day of service delivered in a particular funding year (HCF Program).
- HCPs are required to retain documentation sufficient to establish compliance with all FCC rules.
- Service providers must retain documentation related to the delivery of discounted services for at least five years after the last day of delivery of discounted services.
- HCPs and service providers shall produce records at the request of the Commission, any auditor appointed by USAC or other state or federal agency with jurisdiction.

Examples of Documentation Retention

- **Proof of Eligibility**: Business license, Internal Revenue Service (IRS) not-for-profit determination letter, or IRS Form 990.
- **Competitive Bidding & Vendor Selection**: Copies of all responses or bids received, including bids that were disqualified. Documentation of communications with service providers during the competitive bid process. Bid selection criteria and analysis documentation.
- **Invoicing:** Documentation demonstrating the reimbursements/credits for supported services that were received from the service provider. Documentation demonstrating that the HCP paid the service provider the HCP's share of costs (35% contribution) for services received.

Documents Available in My Portal

HCF	Telecom
• Approved FCC Forms 460, 461, 462, 463	• Submitted and approved FCC Forms 465, 466, 467
• HCF Funding Commitment Letters (FCLs)	• Telecom Funding Commitment Letters (FCLs)
• PAH Account Holder Management	• PAH Account Holder Management
• Network Cost Worksheet (NCW)	• Copies of submitted contracts
	• Supporting documentation
	• Copies of automated emails from USAC (info requests, form approvals)

Questions?

Resources

RHC 102

RHC Program Search Tools

- Commitments Search
  - Funding information for past funding years
  - You may filter by states or years for more specific information.
  - Different searches for the HCF Program and Telecom Programs
- Search Posted Services
  - This tool allows service providers to view service request information posted by consortia and individual health care providers.
  - Different Searches for the HCF Program and Telecom Programs

Training & Resources

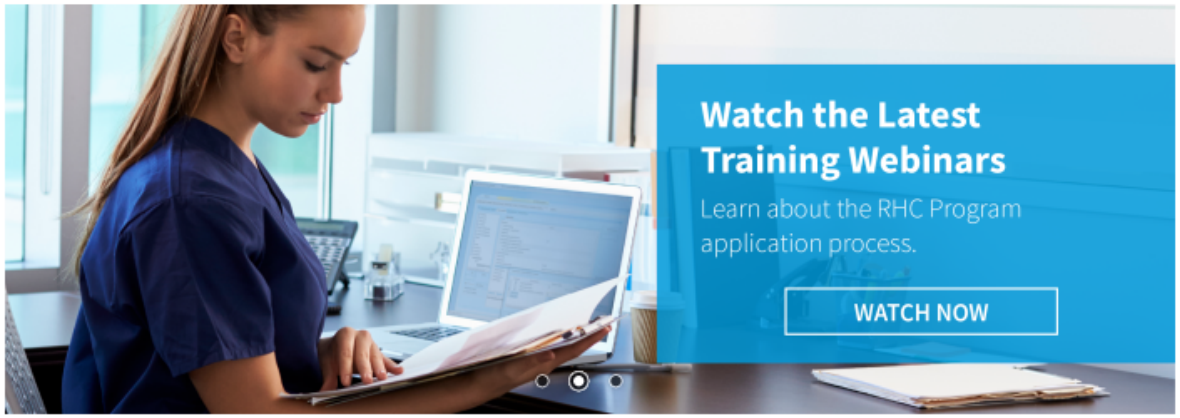
- Webinars
- RHC Monthly Newsletter
- Training Videos
- Handouts

ABOUT THE PROGRAM

- Process Overview
- Appeals & Audits
- Program Calendar (FY2019)
- Funding Commitments (FY2017)
- 2018 Funding Cap Order
- Glossary of Terms (PDF)
- FAQs

RESOURCES & TOOLS

- Forms
- My Portal
- Tools
- Latest News
- Sample Documents
- FCC Resources
- Trainings & Outreach
- Contact Us



INDIVIDUAL HCPS | CONSORTIA | SERVICE PROVIDERS

LATEST NEWS

My Portal Outage Due to System Maintenance Friday, March 1 (2/25/2019)

Newsletter for February 2019 (2/7/2019)

FY2019 Filing Window Open Now! (2/1/2019)

Watch the Funding Request Best Practices Webinar Now! (1/18/2019)

Newsletter for January 2019 (1/3/2019)

Read more

QUICK LINKS

FY2019 Calendar – View Important Deadlines

HCF Program Invoice Deadline Lookup Tool – Search by HCP# or FRN

Urban and Rural Rate Information – Telecom Program

Letter of Agency Information – Download a Sample LOA

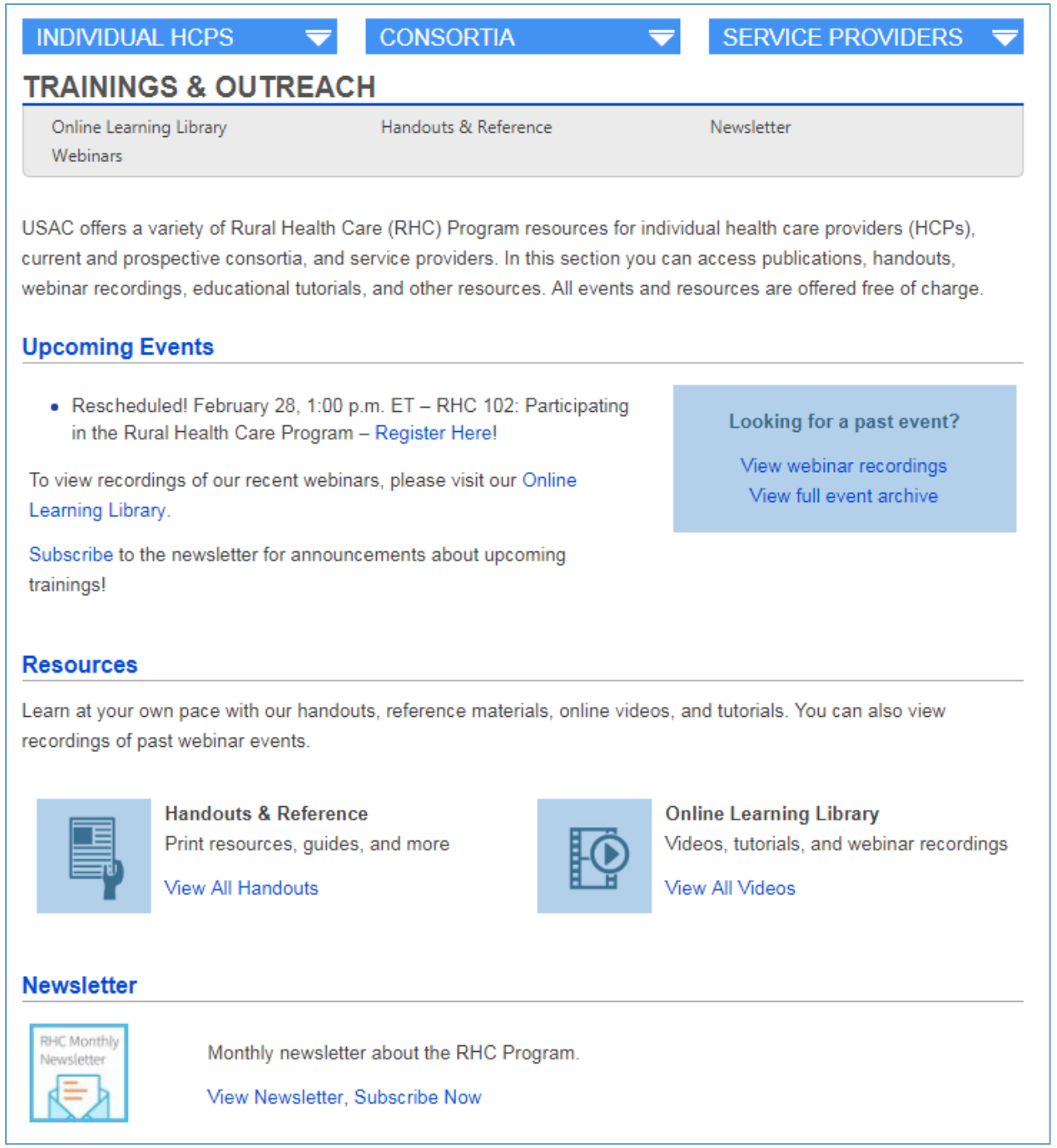
Third Party Authorization Information – Download a Sample TPA

Read more

Upcoming Webinars and Trainings

Helpful materials to guide you through the application process

Subscribe to the newsletter



Webinar recordings

RHC Program Help Desk

- Email: RHC-Assist@usac.org
  - Email at any time to request a one-on-one appointment to learn more about the application process or ask specific questions.
- Phone: **(800) 453-1546**
  - Hours are 8:00 a.m. – 8:00 p.m. ET

Emailing the RHC Help Desk

- Include in your email
  - HCP Number
  - FRN Number

The Help Desk

The Help Desk CAN	The Help Desk CANNOT
• Answer general questions regarding both programs	• Determine the eligibility of a site or service without a form submission
• Look up account holder information for an HCP	• Review your form before you submit for accuracy
• Accept feedback for future program consideration	• Contact a services provider or other account holder on your behalf
• Guide you to helpful resources and information	• Provide documents that are not already accessible in your My Portal account.
• Assist with My Portal	

Questions?

Thank You for Joining Us Today!

- RHC Help Desk
  - Call (800) 453-1546
    - 8:00 a.m. – 8:00 p.m. ET
  - Email RHC-Assist@usac.org

Universal Service
Administrative Co.