



Ministerial and Clerical Errors

Training for Success
September – October 2006
Schools and Libraries Division

Washington, DC • Boston • Seattle • St. Louis • Atlanta • Houston • San Diego

Bishop Perry Order

- FCC directed USAC “to provide all E-rate applicants with an opportunity to cure ministerial and clerical errors on their FCC Form 470 or FCC Form 471, and an additional opportunity to file the required certifications.” (Released May 19, 2006, GRO 06-54)

Bishop Perry Order

- The FCC further indicated that “applicants shall have 15 calendar days from the date of the receipt of notice in writing by USAC to amend or refile the FCC Form 470, FCC Form 471 or associated certifications.”

- Note:

For a complete copy of the Bishop Perry Order see:

http://hraunfoss.fcc.gov/edocs_public/attachm atch/FCC-06-54A1.pdf

Ministerial & Clerical Errors

Ministerial & Clerical Working Definition:

- Corrections that do not require the Form 470 to be **reposted** or the Form 471 to be **refiled**;
- The correction will not violate FCC regulations and/or program rules; and
- Meet Forms 470 and 471 certification deadlines.

Ministerial & Clerical Errors

Types of Ministerial & Clerical Errors

- Minimum Processing Standards (MPS) Rejections
- Forms 470 & 471 Certifications missing or late
- Forms 470 & 471 Specific Block & Item Number Errors

MPS Allowable Corrections

- MPS errors are missing information on forms which prevents USAC from posting a Form 470 or completing data entry of a Form 471
- MPS ONLY occurs when Forms 470 & 471 and Certifications are submitted on **paper**

TIP: Avoid MPS errors by using the Apply Online System and the PIN e-certify

MPS Allowable Corrections

MPS Allowable Corrections

Forms 470 & 471 Errors

- ✓ Using the Incorrect Form Version
- ✓ Missing Applicant Name
- ✓ Missing Contact Information

Form 470 Error

- ✓ Missing Type of Service (Items 8, 9, 10, 11)

Form 471 Error

- ✓ Missing Service Provider Identification Number (SPIN)

MPS Allowable Corrections

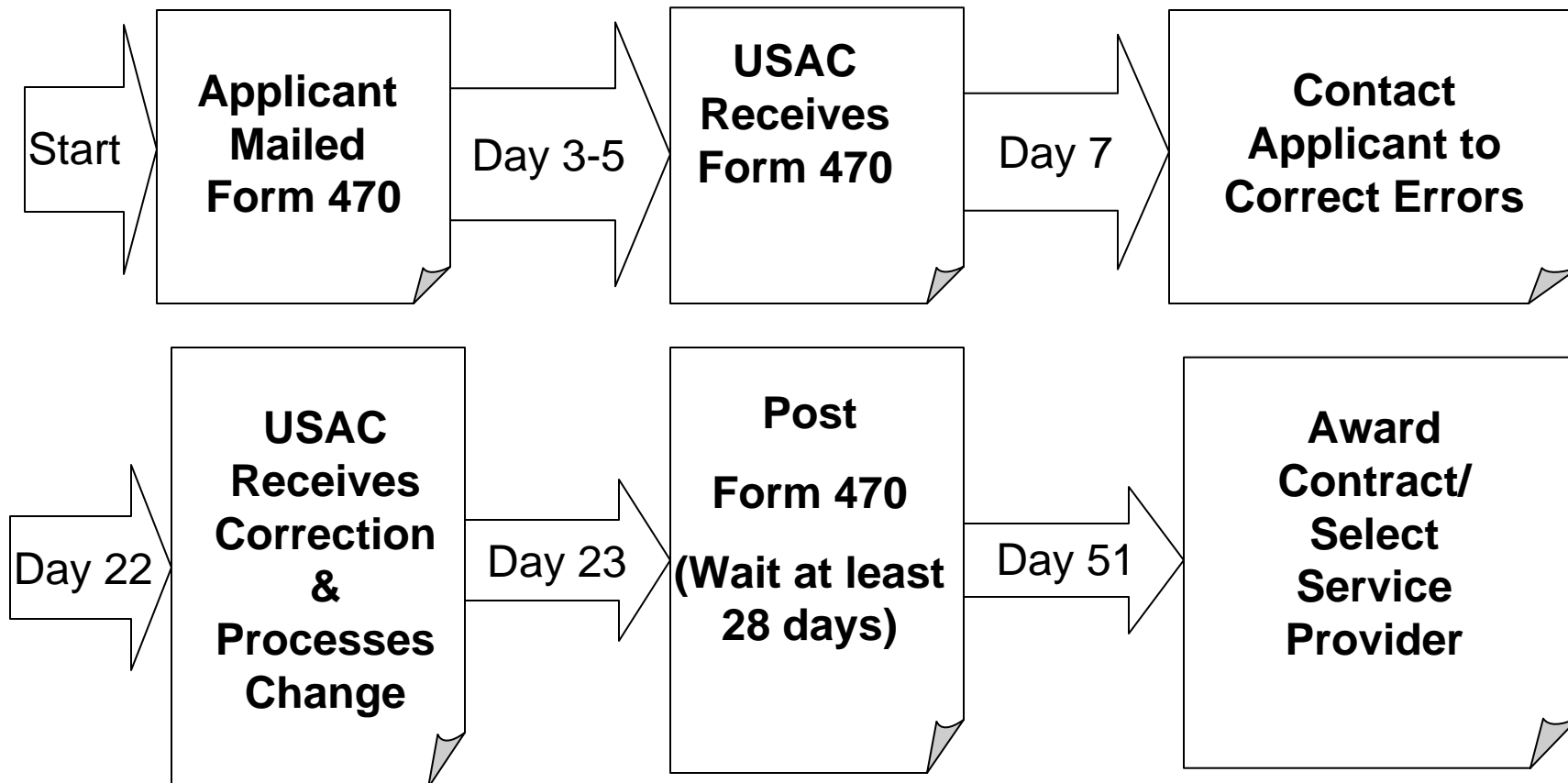
Corrections must be submitted within 15 calendar days once notified by USAC

IMPORTANT NOTES:

- 28-day posting period will not start until MPS corrections are processed and Form 470 is posted to USAC website
- Form 470 must be posted for 28 days before selecting a service provider and/or signing a contract

MPS Allowable Corrections

Form 470 Posting Timeline Example



Certification Allowable Corrections

Certification corrections **ONLY** can occur when:

- The application is completed and submitted within the filing window

Certification Allowable Corrections

Forms 470/471

Certification Allowable Corrections

- Paper Certifications Submitted Out of Window or not submitted
- Missing Authorized Signature
- Missing Certification Date

Block & Item Number 470 Allowable Corrections

- These corrections are applicable to online and paper applications
- Allowable corrections can be made without posting a New Form 470
- *Non-allowable corrections* require a new Form 470 to be posted to USAC's website. Examples:
 - ✓ Adding/Deleting a new Service Category
 - ✓ Changing Service Description
 - ✓ Changing Product or Service Quantity

Block & Item Number 470 Allowable Corrections

Form 470 Block & Item Number Allowable Corrections

Allowable Correction	Corrective Action	Block & Item Number
1. Contact Person Name	Update contact information	Block 1, Item 6a
2. Eligible Entities receiving service	Update the number of eligible entities receiving service	Block 4, Item 16c
3. Billed Entities that will be paying the bills	Add/delete entities	Block 4, Item 17

Block & Item Number 471 Allowable Corrections

- These corrections are applicable to **online** and **paper** applications
- Allowable corrections can be made without filing a New Form 471
- *Non-allowable corrections* require a new Form 471 to be filed. Examples:
 - ✓ Changing Contract Expiration Date
 - ✓ Adding FRNs
 - ✓ Changing Service Categories



Block & Item Number 471 Allowable Corrections

Form 471 Block & Item Number Allowable Corrections

Allowable Correction	Corrective Action	Block & Item Number
1. Billed Entity Contact Person Name	Update contact information	Block 1, Item 6a
2. Discount Calculation	Update the discount calculations for each entity listed (even if it increases the discount rate)	Block 4
3. Establishing Form 470 Number	Correct the Form 470 referenced for each FRN in the Form 471	Block 5, Item 12



Block & Item Number 471 Allowable Corrections

Form 471 Block & Item Number Allowable Corrections

Allowable Correction	Corrective Action	Block & Item Number
4. SPIN Number and Name	Submit Corrective SPIN changes	Block 5, Items 13 & 14
5. Contract Number	Add or Update Contract Number	Block 5, Item 15b
6. Service Provider Billing Account Number	Add or Update Billing Account Number	Block 5, Item 16
7. Contract Award Date	Correct Contract Award Date	Block 5, Item 18



Block & Item Number 471 Allowable Corrections

Form 471 Block & Item Number Allowable Corrections

Allowable Correction	Corrective Action	Block & Item Number
8. Entities Receiving Service	Add/Delete Entities (even if the discount rate increases)	Block 5, Items 22
9. Discount Calculations	Update FRN discount (even if the discount rate increases)	Block 5, Item 23
10. Budgeted Amount for Ineligibles	Update Amount for Ineligibles	Block 6, Item 25d

Ministerial & Clerical Review

What USAC Will Review During FY2006

- Bishop Perry Remand Applications
- Pre-Commitment Applications
 - ✓ All Uncommitted / Under PIA review Form 471 applications that were not issued an FCDL by May 19
 - ✓ FY2006 Forms 470 and 471 submitted by close of window that failed MPS and/or lack certifications
 - ✓ FY2006 Forms 471 with detectable errors
- Appeals
 - ✓ All Pending appeals that were not issued a decision (i.e., ADL, RFCDL) by May 19

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Appeals Process

1. If an appeal concerns only M&C errors, USAC will send the applicant a letter dismissing the appeal and will give the applicant an opportunity to correct those errors through the customary M&C correction process.

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Appeals Process

2. If an appeal concerns both M&C errors and other issues, USAC will give the applicant an opportunity to correct the M&C errors during the appeal review process. USAC will follow its regular appeals process to address the other issues.

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Appeals Process

3. If the appeal concerns only issues other than M&C errors, USAC will follow its regular appeals process.

Ministerial & Clerical Review

What to Expect:

- USAC will contact you and inform you of your detectable corrections.
 - It is important that you review your form(s) to identify all corrections. *Some corrections are not detectable by USAC (e.g., Contact Information, Entities Corrections, Contract Award Date)*
- You will have 15 calendar days to submit corrections to errors USAC and/or you identified.

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When Applicants Should Submit Corrections

- If PIA has not contacted you yet and you wish to submit your corrections, follow the website guidance .
<http://www.usac.org/sl/tools/reference/what-applicants-need-to-do.aspx>
- When PIA or Appeals contacts you, submit corrections to them. Respond within 15 calendar days of PIA contact.

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Where Applicants Should Submit Corrections

- Summer Deferrals end September 12.
- Summer Deferral applicants must respond to USAC within 15 calendar days of USAC contact.

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When Submitting Corrections

- Write “Ministerial & Clerical” or “FCC 06-54 Corrections” at the top of every page to clearly identify your request.
- Write your Form 470 or Form 471 Application Number at the top of every page.

Ministerial & Clerical Review

FY2007 Application Review

- Pre-Commitment Applications
 - ✓ All Forms 471 submitted by the close of the FY2007 window
 - ✓ Forms 470 and 471 that fail MPS
 - ✓ Remember that Forms 470 must still be posted to the website in time to wait 28 days before filing Form 471

Ministerial & Clerical Review

- **Revised RNL & RAL**
 - ✓ Allowable corrections can be submitted through the RNL & RAL process
 - ✓ Receipt of the RNL & RAL is USAC's notification to the applicant to submit corrections.

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■ Revised RNL & RAL

- ✓ If you have already received an RNL for your FY2007 Form 470, you will receive a revised RNL in late fall. You may submit your corrections on the revised RNL.

TIP: Verify that your contact mailing information has not changed to ensure receipt of the RNL & RAL