Advanced Program Integrity Assurance (PIA)

Helping You Succeed

Schools and Libraries Division

Washington, DC • Newark • Atlanta • Chicago • Orlando • Los Angeles • Portland • Houston

September/October 2009

Overview

- PIA Review Updates

- Entity Eligible and Discounts

- Schools Closings

- PIA Contact

- CIPA

- Form 471 Certifications

- PIA Review Tips

PIA Review Updates

- **FCC and Program Rule changes**
  - None. FCC and Program rules have **NOT** changed

- **PIA procedures are updated:**
  - to address new conditions or circumstances affecting applicants,
  - to improve customer service, and
  - to ensure compliance with FCC rules

PIA Review Updates

- More eligible entities (e.g., Dual Use Libraries, Head Start, Special Education programs for pre-school & Adult Education)
  - Complete the bi-annual survey concerning non-traditional entities
  - Inform USAC when your state's regulations have changed
    - A statute or regulation providing an alternative definition of school specifically for the purposes of receiving E-rate discounts will not be accepted

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PIA Review Updates

- ## Single entity with multiple facilities

  - ### Entity Number

    - Obtain an entity number for each facility if the facility has a different address or a public right-of-way crosses the campus

  - ### Discount

    - Discount is based on the total enrollment for the entity and NSLP data

    - Each location receives the same discount

  - ### List each facility on the Item 21 Attachment

PIA Review Updates

- When your school or library closes or merges, PIA will request:
  - Revised student enrollment count & discount percentage
  - Closing/merger effective dates
  - Provide a cost allocation to remove services and funding from shared FRNs or cancel the FRN
  - A statement from a school official (e.g., Superintendent, Board of Directors)
  - Equipment transfer notification for equipment purchased within the last three years

PIA Review Updates

- Provide a detailed explanation & supporting documentation when:
    - Cost allocation is not required
    - Student enrollment will not change
    - Repurposing the facility (e.g., administrative building, NIF)

- Contact CSB to change entity name and/or address or to request new entity number
    - You may need a new entity number when the facility has a different address, serves multiple entities (e.g., IT building serving multiple schools), or a public right-of-way crosses the campus

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PIA Review Updates

- **Applicant & Service Provider Contact**
  - Service review request for information from Service Providers
    - Applicants are copied on service provider's 2nd request for information
    - Applicants are informed when service provider fails to respond and the FRN(s) may be modified or denied as a result
  - Large dollar application non-response
    - Superintendent or Chief Librarian is contacted when no one responds to PIA inquiry

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PIA Review Updates

- ## Protecting Children in the 21st Century Act

  - Enacted in Fall 2008 to address Internet Safety in schools, specifically cyberbullying awareness and response

  - Before USAC can enforce new requirements the following must occur:

    - FCC will issue a Notice of Proposed Rulemaking (NPRM) seeking comment on the Act

    - FCC will draft new rules and the new rules must be voted by the FCC Commissioners

    - FCC will release guidance to USAC in an Order

PIA Review Updates

CIPA (Children's Internet Protection Act)

– FCC Rules <u>have not changed</u>

– Non-telecom FRN(s) must be CIPA compliant at the start of service or when the Form 486 is filed, whichever is earlier.

– Applicants must <u>retain</u> documentation demonstrating their CIPA compliance

PIA Review Updates

- PIA review occurs to ensure CIPA compliance for that funding year by the time services begin or the filing of Form 486

- During PIA review applicants are informed about any deficiencies *(non-compliance issues)*
  - Advisory email is sent after the review
  - FCDL comment provides an explanation

- Applicants may cure the deficiency prior to the start of service or the filing of the Form 486, whichever is earlier

PIA Review Updates

- ## CIPA Requirements
  - Public Notice & Public Hearing
  - Technology Protection Measure (Filter)
  - Internet Safety Policy (required elements)
    - Access by minors to inappropriate matter on the Internet
    - Safety & security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications
    - Unauthorized access including "hacking" & other unlawful activities by minors online
    - Unauthorized disclosure, use, & dissemination of personal information regarding minors
    - Measures designed to restrict minors' access to materials harmful to minors

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PIA Review Updates

- ## Form 471 Item 25 Certifications
  - Read the certification statements before certifying
  - Service providers should **NOT** pay for the applicant's non-discount share and/or assist applicants with securing the applicant's non-discount share
  - Applicants should identify the costs associated with their necessary resources (e.g., hardware, professional development, software, retrofitting and maintenance)
    - Enter the amount in Item 25d
    - *If applicants file multiple forms, they may enter their aggregate amount requested on one form*

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- **Form 471 Contact Information**
  - Will the primary contact person be available to respond to PIA inquiries?
  - Did you provide a complete mailing address?
  - Is the telephone or fax number still valid?
  - Does the primary or alternate contact person have access to the email or fax listed in your preferred mode of contact ?

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- **Form 471 Contact Information**
  - Inform the Client Service Bureau (CSB) about changes to Form 471 contact information
  - Send a request via your organization's e-mail account or on your organization's letterhead to CSB detailing your request
    - Make sure you indicate if your request is form-specific or if USAC should update its database

PIA Review Tips

- Preferred Mode of Contact
  - Avoid using generic email addresses (e.g., info@abcschool.edu) or fax numbers so PIA inquiries are not lost in a general inbox
  - Add *@sl.universalservice.org domain to your safe senders list to avoid PIA email going to your junk mail

PIA Review Tips

- ## Review your Form 471
  - Make sure all the entities listed on the Block 4 are receiving service for that fund year
  - Make sure you did not include ineligible entities on your application

- ## Review your RAL
  - Make sure your funding requests are accurate
  - Submit timely RAL corrections
  - Do not wait until a PIA reviewer contacts you to submit your corrections **(Remember your deadline)**

- **Documents, Documents** (USE THE E-RATE BINDER)
  - Discount calculation (NLSP data, surveys, student enrollment count, etc.)
  - Competitive bidding documents (e.g., RFPs, bid evaluation sheets, memos, award notices)
  - Contracts (signed & dated), Purchase Orders
  - Consortium Letters of Agency
  - Consultant agreements, if applicable
  - Technology Plans (written & approved plans)
  - Approved or draft budget
  - School Charter, Board Papers

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PIA Review Tips

- Communicate with your reviewer
  - Ask questions if you don't understand
  - Ask for an extension if you need more time to respond
  - Let the reviewer know if you will be available to respond to inquiries
  - PIA managers are also available for additional assistance
  - Answer all questions <u>completely</u>

PIA Review Tips

- ■ Same question Same response
  - – You may reference previously submitted responses (provide application # and FRN)

- ■ Review your documentation you send to PIA before you send it
  - – Make sure the documentation is applicable to the FRNs under review
  - – Check contracts and/or LOAs dates & signatures
  - – Cost allocations must be based on tangible evidence that reaches a realistic result
  - – Discrepancies among documents and forms will generate additional questions from PIA

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Questions?

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