Understanding Program Integrity Assurance (PIA)

Helping You Succeed

Schools and Libraries Division

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September/October 2009

Overview

- PIA Review

- Levels of PIA Review

- Preparing for PIA Review

- Item 21 Attachments

- PIA Review Tips

PIA Review

Program Integrity Assurance (PIA)

- PIA is the review of applicants' Forms 470 and 471 to ensure program compliance with FCC and program rules before funding commitments are issued

- All Forms 471 applications are reviewed for:
  - Entity Eligibility
  - Discount Accuracy
  - Eligible Products & Services
  - Compliance with Program Rules

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Review Types

- ## PIA Review

  - <u>All</u> Form 471 applications undergo PIA Review
  - Review occurs by application

- ## Heightened Scrutiny Reviews

  - Some Form 471 applications undergo Heightened Scrutiny reviews
  - Review occurs by BEN
  - Selective, cost effectiveness, consortium, and special compliance are the types of Heightened Scrutiny reviews

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PIA Review

- **Heightened Scrutiny Reviews**
  - Targeted reviews of one or more of the following areas:
    - Competitive bidding and evaluation process
    - Budget
    - Technology plan
    - Necessary resources (e.g., professional development, software, hardware, maintenance)
    - Products/services pricing and use

PIA reviews are independent of Heightened Scrutiny reviews

Levels of PIA Review

Initial & Final Review

- Applications always start in Initial Review

- Initial Reviewer from regular and/or heightened scrutiny team contacts the applicant with questions

- Final Reviewer reviews the Initial Reviewer applications. If the Final Reviewer finds an issue with the review of the application, the application is returned to the Initial Reviewer to make corrections.

Quality Assurance (QA) Review

- Some Form 471 applications are selected for QA review

- QA has Initial and Final review levels

Levels of PIA Review

Form 471 Application Status

- Real time application status tool on USAC website [Form Application Status](#)

- Waiting for documentation, 15-day, Initial Review, QA1 are examples of status indicators

Preparing for PIA Review

- **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 ?

Preparing for PIA Review

- **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

Preparing for PIA Review

- **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

Preparing for PIA Review

- 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)**

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Preparing for PIA Review

- Gather your documents (retain, retain)
  - 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

Preparing for PIA Review

- Gather your documents
  - Item 21 Attachments (online or paper copies)
  - Vendor documentation
    - Network diagram (On-premise Priority 1 requests)
    - Web hosting eligibility
    - Bills, invoices, etc.
  - Entity eligibility documentation
    - Charters
    - Proof of new construction documentation (RFP, statement of work, Board Approval)

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Preparing for PIA Review

- **Check Hyperlinks**
  - Make sure website address is still active
  - Provide PIA with password for password protected site, such as RFPs, State Master Contracts

- **Submit your Item 21 Attachment**
  - Submit your Item 21 Attachment before your PIA review begins
  - Don't submit online & paper Item 21 Attachments for the same FRN.
  - Use the Online Item 21 Attachment Tool (Remember to "click" the submit button)

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Item 21 Attachment

- Label
  - Make sure to include Block 1 entity name & number, FRN, Attachment ID, & page number on each page
- Identify
  - Eligible and ineligible entities, costs, equipment, & products
  - Terms of service – Tariffed/MTM or contract
  - Charges - recurring, non-recurring, or both
  - Service or equipment location

Item 21 Attachment

- **Details**
  - Include product/equipment description, specifications & functionality
    - Server functionality is not specified (e.g., file, network, web)
    - DHCP, DNS, Email, Proxy, etc.
    - Make and model for equipment
    - PBX component listing
  - Provide miscellaneous charges description

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
  - Document discrepancies will generate additional questions from PIA

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PIA Review Tips

- **Submit Form 471 corrections before the deadline**

- **Review all documentation PIA sends to you**
  - PIA will inform applicants about FRN modifications and denials before FCDL is issued
  - Applicants can provide alternative documentation if the applicant disagrees with PIA results

- **Maintain an E-Rate Binder**
  - Retain hard copies of your electronic documents

Questions?

www.usac.org