



E-rate Program

Avoid the Dirty Dozen Mistakes

Fall 2013 Applicant Trainings



Avoid the Dirty Dozen Mistakes

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Paper Forms

Submitting paper forms containing errors

We suggest that you file your FCC forms electronically. If you file on paper, complete every field in FCC Forms and check for accuracy before submitting. Otherwise:

- The Client Service Bureau (CSB) must first contact you and ask for corrections. If you didn't include identifying information on your paper form, CSB may not be able to reach you.
- Your FCC Form 470 may not be posted by the deadline. (Forms filed online are posted immediately.)
- Paper invoice forms (FCC Forms 472 and 474) with incomplete information may be rejected upfront ("pass zero").

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Paper Forms

Unsigned, undated FCC Form 486 paper certification

FCC Form 486
 Entity Number: [redacted] Applicant's Form Identifier: 486_2013
 Contact Person: [redacted] Phone Number: [redacted]
 Please verify that the information on this form can be provided by the individual named in the Certification under the Commission's rules, 47 C.F.R. Section 90.10005, or the implementation section 101.10 of the United States Code, 46 U.S.C. 3605.
 13. Signature of authorized person: [redacted]
 14. Printed name of authorized person: [redacted]
 15. Title or position of authorized person: Technology Director
 16a. Street Address, P.O. Box, or Route Number: [redacted]
 16b. City: [redacted]
 16c. State: [redacted] Zip Code: [redacted]
 16d. Telephone number of authorized person: Extension: [redacted] Fax number of authorized person: [redacted]
 16e. Email address of authorized person: [redacted]



Paper Forms

FCC Form 472 – applicant certification page 3 signed by applicant

FCC Form 472 – service provider certification page 4 signed by same applicant

Printed Entity Name: [redacted]
 Entity Number: [redacted]
 Contact Name: [redacted]
 Contact Phone Number: [redacted]
 Signature: [redacted]
 Date: 7/24/2013
 Title: Director of Technology

Printed Entity Name: [redacted]
 Entity Number: [redacted]
 Contact Name: [redacted]
 Contact Phone Number: [redacted]
 Signature: [redacted]
 Date: 7/24/2013
 Title: Director of Technology



Paper Forms

Submitting paper forms containing errors

To avoid delays and/or denials:

- File online if possible.
- Check your work for accuracy.
- Refer to the source documents that contain the correct information (e.g., Funding Commitment Decision Letter, FCC Form 486 Notification Letter) when you work on your forms.
- Ask CSB for help if you need it.
 - [Submit a Question](#) or call (888) 203-8100





Deadlines

Missing deadlines

Many FCC forms and requests are subject to deadlines. Missing a deadline can have negative consequences, including:

- An FCC Form 471 submitted after the close of the filing window will not be considered for funding.
- An FCC Form 486 submitted after the deadline will have its service start date adjusted to the date 120 days before receipt or postmark of the form. Invoices for services delivered before the adjusted service start date will not be paid.
- An appeal submitted after the 60-day deadline will be dismissed.



Deadlines

Missing deadlines

Common problems (cont.)

- A service delivery deadline extension requests submitted after the last day to receive services will be rejected.
- An invoice submitted after the invoice deadline will be rejected. To resubmit, an invoice deadline extension request must first be submitted to USAC and approved.
- Ministerial or clerical error corrections submitted after the FCDL is issued will not be made by PIA.
- PIA questions that are not answered result in a decision based on the information at hand, which may lead to a reduction or a denial.



Deadlines

Missing deadlines

To avoid delays and/or denials:

- Don't wait until the last minute to file forms, submit requests, or respond to questions.
- Track your upcoming deadlines and manage your time wisely to meet them.
- Check your submissions for completeness and accuracy.
- Use the [Deadlines](#) tool if you're not sure of a deadline.
- Ask CSB for help if you need it.



Competitive Bidding

Not Following Competitive Bidding Rules

Posting an FCC Form 470 opens a competitive bidding process governed by program rules. Any of the following violations of those rules can lead to funding denials:

- Not waiting 28 days after posting an FCC Form 470 to the USAC website or after issuing a Request for Proposal (RFP) – whichever is later – before closing your competitive bidding process, selecting a service provider, signing a contract, and filing an FCC Form 471.



Competitive Bidding

Not Following Competitive Bidding Rules

Common problems (cont.):

- Stating on the FCC Form 470 that you have not issued or do not intend to issue an RFP or similar document describing the desired services or procurement process, when in fact you have or later do issue an RFP or similar document.
- Neglecting to conduct a bid evaluation.
- Not considering the price of the eligible products and services as the most heavily weighted factor in your bid evaluation.



Competitive Bidding

Not Following Competitive Bidding Rules

Common problems (cont.)

- Neglecting to evaluate all comparable options on a state master contract, using the same criteria you would use to evaluate bids received in response to your own FCC Form 470.
- Accepting assistance with your competitive bidding process from a service provider.
- Having improper communications with the selected service provider or accepting prohibited gifts from the selected service provider prior to or during the competitive bidding process.



Competitive Bidding

Not Following Competitive Bidding Rules

To avoid delays and/or denials:

- Review the [competitive bidding](#) and [bid evaluation](#) guidance and related documents on the USAC website and follow them.
- Make sure your competitive bidding process is open and fair.
- Ask CSB for help if you need it.



Service Providers

Lack of Communication with the Service Provider

Communication with the service provider AFTER the competitive bidding process is over is an important part of the application process. Lack of communication can result in:

- Contractual disputes where no program rules were violated – USAC’s ability to provide assistance is extremely limited in these circumstances.
- Incorrect SPINs featured on FCC Form 471 funding requests.
- Service providers not prepared to assist applicants with technical information requested during PIA review.
- Ineligible products and/or services delivered.



Service Providers

Lack of Communication with the Service Provider

Common problems (cont.)

- Invoicing issues, for example:
 - Confusion about invoicing method (BEAR vs. SPI).
 - Services that must be invoiced under separate FRNs or separate SPINs.
 - BEAR reimbursements sent to the wrong address or entity.
 - Services delivered before the service start date that are ineligible for discounts because of timing.
 - Invoicing for products/services that, while eligible, were not approved as part of a funding request.



Service Providers

Lack of Communication with the Service Provider

To avoid delays and/or denials:

- Use the [Search for SPIN Information](#) tool to find your service provider E-rate Program contact information if you do not know it.
- Review your contract and related documents BEFORE signing them.
- Verify with the service provider how many funding requests to file and which SPINs and costs to feature on each one.
- Discuss service delivery, services, invoicing and other program issues with your service provider(s) EARLY in the process but NOT before the competitive bidding process has ended.



Mixed Bucket Funding Requests

Mixed Bucket Funding Requests

Mixing Priority 1 (Telecommunications Services and Internet Access) and Priority 2 (Internal Connections and Basic Maintenance) on the same funding request or the same application causes delays.

- Mixed bucket funding requests filed as Priority 1 must be separated out by your PIA reviewer, and you will be asked to confirm the separation.
- Mixed bucket funding requests filed as Priority 2 may not be reviewed until Priority 2 reviews start.



Mixed Bucket Funding Requests

Mixed Bucket Funding Requests

To avoid delays and/or denials:

- Review the [Eligible Services List](#) for the appropriate funding year to understand which products and services fall under Priority 1 and which fall under Priority 2.
- If your Priority 1 request contains leased equipment, also review the [On-Premise Priority 1 Equipment](#) guidance to verify that it is eligible under Priority 1.
- Check your FCC Form 471 and Item 21 attachment for accuracy.
- Ask CSB for help if you need it.



Discount Calculations

Incorrect Discount Calculations

PIA reviews discount calculations and information carefully. Poor documentation and incorrect or outdated data can delay funding decisions. Here are some of the most common problems:

- If the discount for an entity has increased from the previous year, not providing National School Lunch Program (NSLP) or other discount validation documentation up front.
- Providing discount data from a previous funding year to substantiate the current year's discount calculation (unless program guidance allows for this, e.g., survey data used for two consecutive funding years).



Discounts

Incorrect Discount Calculations

Problems with applicants not using NSLP data to calculate their discounts:

- Using NSLP forms as surveys.
- Not keeping copies of surveys.
- Projecting discounts from surveys with a return rate below 50%.
- Using Community Eligibility Option (CEO) data to validate the reported discount.
 - NOTE: CEO schools use NSLP data from the year before they started participation in CEO. The FCC has not indicated whether it will provide a waiver for FY2014 applications to use old data.



Discounts

Incorrect Discount Calculations

To avoid delays and/or denials:

- Read the [Calculating Discounts](#) guidance to understand how discounts are calculated and what documentation you need.
- Review and follow the [Alternative Discount Mechanisms](#) guidance if you are not using NSLP data.
- Maintain your discount calculation source documentation – e.g., NSLP data, surveys, list of matching siblings, direct certification list – for each year it affects so that you can produce it if requested.



Responses to PIA

Incomplete Responses to PIA

Program Integrity Assurance (PIA) reviews applications for compliance with program rules. If PIA emails or faxes questions but receives incomplete responses, or no response, the funding decision is based on the information at hand. Incomplete responses include:

- A response that does not directly address the PIA questions.
- A response that addresses some but not all of the PIA questions.
- A response that does not include documentation when documentation was specifically requested.



Responses to PIA

Insufficient Response

I. Technology Plan:

- Please indicate the date your technology plan was created. Your technology plan must be created ("written") before your FCC Form 470 is posted. We define the creation date of your plan as the date it first contained the four required elements in sufficient detail to support the services requested on your FCC Form 470.

For FY2011 the Technology Plan was already approved prior to the posting of the Form 470. Please advise if the creation date is still required.



Responses to PIA

Insufficient Response


FRN ~~XXXXXX~~

- Based on the documentation that you have provided, the entire FRN ~~XXXXXX~~ will be denied because the contract that you provided was signed prior to the Allowable Contract Date (ACD). The contract you provided was dated on 12/20/2011. For additional contract guidance, please refer to the USAC website at <http://www.usac.org/sl/applicants/step03/contracts.aspx>.

If you disagree with our determination and you have alternative information, please provide the supporting documentation.

While I don't totally agree with the decision as this is a continuation contract we have to accept your decision.

If you fail to respond to this email within 7 days, we will perform the action(s) listed above.


 **Item 21 Attachments**

Item 21 Attachment with No Identifying Information (FCC Form 471 application number, FRN, BEN, etc.)

From: [REDACTED]
Sent: Tuesday, March 12, 2013 3:13 PM
To: attachments
Subject: 470-2013 request for basic maintenance

Service	Quantity and/or Capacity
Basic Maintenance & Tech Support (SERVICES REQUESTED)	Includes repair and upkeep of eligible hardware, cable, wired & wireless maintenance, basic tech support, install & configuration, charge orders changes
Basic Maintenance & Network Tech Support for all eligible hardware components (LOCATIONS)	5 sites- admin, primary, elementary, middle & high school
Basic Maintenance & Network Tech Support for all eligible hardware components (REQUESTED SERVICES)	Block Time Estimated hours = 2 days/ month x 12 months = approx 200 annual hours
BIDDER INFORMATION - WALK THROUGH	MANDATORY walk through - JAN 24, 2013 @ 2PM
BIDDER INFORMATION - BIDS DUE BY	No bids will be accepted after - FEB 21, 2013 @ 3PM
BIDDER INFORMATION - Technical Contact	see Block #2 ITEM # 12 - [REDACTED], Technology Director
BIDDER INFORMATION - List of Equipment	existing network equipment list will be provided at School Site visit - also include service for equipment listed in internal connections
BIDDER INFORMATION - Bids must	be divided by school site - by estimate hours per location
BIDDER INFORMATION - Radius Restriction for IBM Services	within 100 miles of district site

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 **Item 21 Attachments**

Missing or Incomplete Item 21 Attachments

To avoid delays and/or denials:

- Read and carefully follow the [Item 21 Attachment](#) guidance.
- Identify your work – contact information, FRN, etc.
- Check your work for completeness and accuracy.
- File online if possible.
- File early.
- If you file by email, fax, or on paper, include all the Item 21 attachments for a single FCC Form 471 in one clearly labeled submission. USAC stores these by form number, not by FRN.

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 **USAC Letters**

USAC Receipt Acknowledgment and Notification Letters

Each time you file an FCC form, USAC issues a letter containing useful information. You should review the contents of the letter carefully. If you don't:

- You may miss errors that could be corrected by using the procedure described in the letter.
- You may not be aware of the next steps in the process, including upcoming deadlines.
- The processing of your next program form may be delayed if you do not refer to the information in the current letter when completing that next form.

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Invoicing

Poor Invoicing Practices

USAC must be invoiced – either through the applicant FCC Form 472 (BEAR Form) or service provider FCC Form 474 (SPI Form) – for discounts on services actually delivered and installed. Delays or denials can occur if:

- Invoices are filed after the invoicing deadline.
- Invoice-related forms are not filed first (FCC Form 473 for service providers, FCC Form 486 for applicants).
- Invoice entries are incomplete or inconsistent.
- If the invoice undergoes review, requested documentation (e.g., proof of payment, copy of contract) is unavailable.



Invoicing

Poor Invoicing Practices

To avoid delays and/or denials:

- Review and follow the [Invoicing](#) guidance, the [FCC Form 472 instructions](#), and (for service providers) the [FCC Form 474 instructions](#) to avoid common mistakes.
- Check your work.
- Submit invoices in a timely fashion. (Note that applicants can file BEAR Forms monthly or quarterly if they want to.)
- Maintain and/or be able to produce backup documentation for invoices (e.g., proof of delivery of services, contracts stipulating specific payment arrangements).



Document Retention

Inadequate Document Retention

The E-rate Program has stringent document retention requirements. Failure to retain documents for the required time period (at least five years from the last date of service delivery) can result in:

- Funding reduction or denial after PIA review.
- Adjusted service start date.
- Invoice rejection.
- Audit findings.
- Commitment adjustment (COMAD).



Managing the Process

Managing Your E-rate Program Process

To avoid delays and/or denials:

- Stay informed.
 - Review the guidance information on the USAC website.
 - Subscribe to the [SL News Brief](#).
- Plan ahead.
 - Create a timeline of your E-rate Program activities and follow it.
 - Submit required forms and requests well before the deadline.



Managing the Process

Managing Your E-rate Program Process

To avoid delays and/or denials (cont.):

- Track your submissions.
 - Call CSB for the status of paper form data entry.
 - Familiarize yourself with the tools on the [Search Tools](#) page to verify postings and certifications, and to track the progress of reviews and requests.
- If you need it, request an extension before the deadline.
- Ask questions.



Questions?
