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## Schools and Libraries News Brief

May 4, 2007

**TIP OF THE WEEK: If you have been chosen for a Selective Review, start working to prepare a complete and accurate response and return it to USAC within 30 days.** Also, watch for additional guidance on Selective Reviews in an upcoming News Brief.

### Commitments for Funding Year 2006

**Funding Year 2006.** USAC will release FY2006 Wave 51 Funding Commitment Decision Letters (FCDLs) May 9. This wave will include commitments for approved Internal Connections and Basic Maintenance funding requests at 86% and above and denials at 84% and below. As of May 4, FY2006 commitments total just over \$1.9 billion.

After noon on the date that the FCDLs are mailed, you can check to see if you have a commitment by using USAC's [Automated Search of Commitments](#) tool.

### Preparing for PIA Review

The [March 9, 2007 News Brief](#) provided an overview of the Program Integrity Assurance (PIA) process. During this process, PIA reviews your Form 471 and Item 21 Attachment and may need to contact you to ask questions and/or request information to complete the processing of your funding requests.

In general, PIA will send written requests to you by fax or email and ask for your response within 15 days. You can request more time to respond but this will delay PIA's completion of the review process.

Applicant responses to PIA questions or information requests fall into three general categories:

- Reporting allowable corrections
- Answering review questions
- Making required certifications

**Reporting allowable corrections.** Applicants have an opportunity to report allowable corrections to a Form 470 or Form 471 using the [Receipt Notification Letter](#) and the [Receipt Acknowledgment Letter](#), respectively. In addition, PIA will notify applicants during the review process if a correctable error has been detected in an application and give them a second opportunity to correct the error.

For example, say that you find yourself in the following situation:

- You posted a Form 470 on December 31, 2006.
- You signed a contract on February 1, 2007.
- You made a mistake on your Form 471 and reported the Contract Award Date as January 2, 2007 (01/02/2007 instead of 02/01/2007).

PIA will realize that, according to the information you provided, you signed your contract before the 28-day competitive bidding waiting period had elapsed. Rather than deny your application, PIA will reach out to you and ask if the information you provided is correct. If you inform your reviewer that you made a data entry error, you can expect your reviewer to ask for a copy of the contract to confirm that your contract was indeed executed on February 1. As long as your documentation supports the February 1 Contract Award Date, you will be able to correct the error and PIA will proceed with the review of your application.

Keep in mind that PIA cannot identify every possible error on your form. For example, if you listed 13 of the branches of your library system on your Block 4 worksheet but only 11 of them are sharing the associated service, PIA may not notice that you intended to ask for services to only 11 of your branches. In these cases, it is your responsibility to identify the error and inform PIA that a correction is necessary (in this case, that two entities must be removed from the Block 4 worksheet).

**Answering review questions.** During the review of your application, PIA may find that you have not provided enough information to complete its review of your application. PIA may not be able to use your existing information to determine the eligibility of a particular product or service, the correct calculation of a discount, or the proper cost allocation for a product used for both eligible and ineligible purposes. In these cases, and others, PIA will have to ask for additional information to complete its review.

For example, in a funding request for Telecommunications Services, you may have indicated "local and long distance telephone service and associated charges" without specifying what the associated charges are. Directory assistance charges, 900/976 call blocking, and mandatory fees such as federal and state taxes and universal service fees are generally eligible for discounts; directory advertising, reverse directory assistance, payphone telephone service, and monitoring services for alarm telephone lines are not. For PIA to be sure that USAC is providing discounts only on eligible services, PIA may need to obtain a more detailed explanation of your actual services.

When your reviewer needs more information, he or she will fax or email you a list of questions and ask you to respond within 15 days. Your answers to these questions should provide PIA with enough information to complete its analysis. Using the example above, PIA does not want your entire telephone bill (the bulk of which probably details eligible long distance calls) but rather a breakdown of the services with labels such as "Other" or "Associated" or "Miscellaneous."

If you don't understand why PIA has included a particular question, ask your reviewer what he or she is trying to understand. In general, the goal of PIA's questions is to gather enough information to establish eligibility – of an entity, a location, a use, or a service. The responses you provide should clarify the parts of your application that are not clear to your reviewer. In many cases, you don't need to provide volumes of information especially if that information does not explain what is unclear or inconsistent in your application. If you understand the information your reviewer needs, you can provide a better response.

**Making required certifications.** In some cases, PIA will require applicant certifications as part of the review process. In most cases, these certifications can be included as part of your response. Here are two examples of situations where certifications may be required:

- If your reviewer requests a copy of your contract as part of the review process, he or she will review the contract to make sure it complies with program rules. If there is a question, you will be asked to complete a certification that the contract meets your state or local procurement regulations or rules.
- If on your Block 5 funding request you cite a Form 470 that has not been certified, PIA will ask you to certify that Form 470. You can complete the certification online or on paper, but you must respond within 15 days of the PIA request. Note that in this case you cannot simply send a certification page to your reviewer but must follow the [Form 470 Instructions](#) for submitting your certification to USAC online or on paper.

Following are some tips to make the PIA review process easier both for you and for your reviewer:

- Keep your supporting documentation – winning and losing bids, evaluation sheets, budget information, draft or approved technology plan, etc. – in one location. Make sure that someone else at your school or library knows where these documents are stored.
- Complete and submit your Item 21 Attachment if you have not already done so. Use the [online Item 21 Attachment](#) if possible, as it is easy to use and your attachment is available to your reviewer shortly after you submit it. Note that even if you have submitted your Item 21 Attachment, PIA may still have questions or need additional information about the descriptions and uses of your products and services.

- Label all documents and responses you send to PIA with your contact information, Form 471 application number, and Funding Request Number (FRN) to ensure that they are matched to the correct application.
- Provide complete and accurate responses to questions. Ask for clarification if you don't understand what is being requested.
- If you have provided the same information being requested to a different reviewer in this funding year or in a past funding year (for example, a copy of a multi-year contract during last year's review), inform your reviewer of the details. If PIA still has the information on file, you will not need to submit it again.
- Verify that the contact information on your Form 471 is correct. If it has changed, use the guidance in [Contact Information Changes](#) to change or update it. Your reviewer will use the contact information and the preferred mode of contact currently featured on the Form 471 to communicate requests. If you are going to be out of the office temporarily, make sure someone else monitors your preferred mode of contact for communications from PIA.
- Ask for more time if you need it. Asking for additional time may delay the processing of your application but it may help you prepare a more accurate and complete response.

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