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Schools and Libraries News Brief

March 19, 2010

TIP OF THE WEEK: Tuesday, March 30 is the deadline for certifying a Form 471 for FY2010 that was submitted online before the close of the FY2010 filing window. Be sure to certify online or postmark your paper certification on or before this deadline so that your form will be considered in-window.

NOTE: Apply Online and many of the Search Tools will be unavailable from noon to midnight EDT on Saturday, March 20 due to scheduled website maintenance. We apologize for any inconvenience.

Commitments for Funding Year 2009

Funding Year 2009. USAC will release FY2009 Wave 45 Funding Commitment Decision Letters (FCDLs) March 23. This wave will include commitments for approved Internal Connections and Basic Maintenance requests at 80% and above and denials at 69% and below. As of March 19, FY2009 commitments total over \$2.59 billion.

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

Application Process: Overview of PIA Review

Program Integrity Assurance (PIA) is the process used by USAC to review applications for compliance with program rules and policies. During this process, USAC reviews the information on your Form 471 and may contact you with additional questions on specific items.

The review process has two components:

- Initial Review
- Final Review, a quality assurance review process on the work done during Initial Review

Initial Review

After your Form 471 has been assigned to an initial reviewer, the initial reviewer prepares the questions that USAC must ask based on the information you provided (or did not provide) on your application. The questions can cover a wide range of issues on your application, including but not limited to:

- the eligibility of the schools and libraries listed on your application
- the eligibility of the products and services listed on your Item 21 attachment
- the discount rate on your Block 4 worksheet(s)
- your competitive bidding process, including your adherence to the 28-day posting requirement
- discrepancies between the Form 471 request and the Item 21 attachment and/or supporting documentation.

In some cases, the information on the Form 471 is sufficient to complete the review without applicant contact. However, in most cases, USAC must request more information.

Once the questions have been prepared, the initial reviewer contacts you using your preferred mode of contact.

- If your preferred mode of contact is email or fax, the initial reviewer's first contact is the email message or fax containing the list of questions that require a response.
- If your preferred mode is telephone, the initial reviewer will call you and ask for your email address or fax number, and will then email or fax you the list of questions.

- In all cases, USAC provides written questions and asks for written responses to those questions.

In general, you have 15 days from the date of the email or fax to provide responses to USAC's questions. (For more information on the specific summer and winter periods when this procedure is modified, refer to the [Deadlines for Information Requests](#) guidance on the USAC website.)

- If USAC has not received a response – or receives only a partial response – after seven days, USAC sends you a reminder and forwards a copy of the reminder to your state E-rate coordinator.
- If USAC does not receive a response after 15 days, USAC will continue to process your application with the information on hand, which may lead to a modification or denial of funding.

During all review processes, you always have the following options:

- **You can ask for clarification.** If you don't understand one or more questions, ask your initial reviewer what the question means or what information USAC expects in your response.
- **You can ask for more time to respond.** USAC can grant a limited extension of time to respond to questions. However, if you ask for more time, your initial reviewer will set aside your application and start other reviews while you work on your response, so he or she may not be able to return to your application quickly once you provide the information.
- **You can ask to speak with a manager.** If you feel that you are not communicating successfully with your initial reviewer, please ask to speak to a manager. You will not be penalized if you make this request, and the manager can help you understand the questions USAC is asking and the responses USAC expects to receive.

Initial Review modifications and denials

Once Initial Review has been completed, the initial reviewer may recommend that a funding request be modified or denied based on the information supplied during the review. Some examples of modifications are:

- Remove ineligible products and services
- Remove ineligible recipients of service
- Add eligible recipients of service
- Reduce number of months of service
- Reduce amount of funding based on additional documentation you provided
- Change contract start or end dates
- Change from month-to-month services to contracted services
- Change the establishing Form 470 application number.

If the initial reviewer concludes that a funding request should be modified or denied, you will be contacted before USAC issues your FCDL. The initial reviewer will inform you of the result of the review and give you an opportunity to provide additional information if you disagree with the conclusion. (If you agree with the initial reviewer's determination, you do not have to provide a response.) USAC will review any additional information provided.

Final Review

Final Review is a review by USAC of the work done during Initial Review. Each step of the Initial Review process is itself reviewed by a final reviewer to verify that the correct procedures were followed, the appropriate questions were asked, and complete answers were received. If the final reviewer has a concern about any part of the Initial Review process, the application is returned to the initial reviewer for follow-up work.

The result of this process is that you may be contacted after your Initial Review with what may appear to be additional or repetitive questions. If the questions you are being asked seem new or repetitive, it is likely that USAC needs additional information that was not gathered during Initial Review. Make sure you understand what information is being requested and provide the information as quickly and accurately as possible.

Quality Assurance (QA) is a third level of review to verify that all parts of the review were done correctly. A much smaller number of applications go through QA. As with Final Review, applications may be returned to the initial reviewer for follow-up.

It is important to understand that the review process is not linear. At any point during the process, an application can be returned to an earlier stage because of work that was not completed correctly or information that is missing. If you are following the progress of your application using the [Form 471 Application Status Tool](#), do not be alarmed if your application seems to move "backward" – that is, to an earlier status. If you do see such a movement, monitor your preferred mode of contact carefully in case an initial reviewer attempts to contact you.

In summary, to be prepared for PIA review, be sure to do the following:

- Check your Form 471 and your [Receipt Acknowledgment Letter \(RAL\)](#) to make sure all of your entries are correct. If you find a mistake, submit a RAL correction by following the instructions in the RAL. (If your review has already started, submit your corrections directly to your reviewer using the reviewer's contact information provided on the PIA fax/email.)
- If you have not already done so, submit your Item 21 Attachment. You can file online, by email, by fax, or on paper by following the [Item 21 Attachment](#) guidance on the USAC website.
- Organize all of the documentation related to your application and have it readily available to assist you in answering any questions.
- Monitor your preferred mode of contact so that you will know when PIA attempts to contact you.
- Answer all questions promptly and completely.
- Ask for more time to respond if you need it.
- If you are having problems, ask to speak to a manager.

Reminder to Complete FCC E-rate Survey

On behalf of the FCC, Harris Interactive, Inc. (Harris), a national marketing research firm, sent out a survey on February 25th by email to randomly selected E-rate applicants to determine the current state of broadband access and usage of schools and libraries and future technological needs.

If you received a survey, the FCC asks that you complete it as soon as possible. For questions related to the survey, please contact Harris at the link provided in the invitation text for the survey. Specifically, if you represent several applicants, Harris will provide you with the applicant name and Billed Entity Number.

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