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Universal Service
Administrative Co.

Schools and Libraries Program News Brief

March 30, 2018

TIP OF THE WEEK: You can get more detail on the **Program Integrity Assurance (PIA) review process described below by attending our April webinar.** [Click here](#) to register, or you can register from the [Webinars](#) page in the Trainings & Outreach section of our website.

Commitments for Funding Year 2017

Funding Year 2017. USAC is scheduled to release Funding Year (FY) 2017 Wave 50 Funding Commitment Decision Letters (FCDLs) on April 6. As of March 30, FY2017 commitments total over \$2.25 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in EPC.

Applicant Profiles Unlocked Next Week

Early next week, USAC will unlock the applicant profiles in EPC. Applicants will be able to change profile information that was locked for the application filing window.

Changes that you make will not be reflected in FCC Forms 471 filed during the FY2018 application filing window. If you have not already done so, submit a RAL modification to provide any corrections you were unable to make before the profiles were locked. That information will then be available to your reviewer during the review of your application (see below).

To submit a RAL modification:

- Log in to your account in EPC.
- Use the search function in the **FCC Forms and Post-Commitment Requests** section of your organization's landing page to locate your FCC Form 471.
- Click your form's application number to access the form.
- Choose the **Related Actions** menu at the top of the form, then choose **Submit Modification Request (RAL)**.
- Follow the prompts to provide the corrected information. You can also attach one or more documents.
- Review your entries and then click **Submit**.

Overview of the PIA Review Process

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 FCC Form 471 and may contact you with additional questions on specific items.

The PIA review process has three basic steps. Not all applications go through all three steps. The steps are:

- Initial Review
- Final Review
- Quality Assurance.

Initial Review

After your FCC 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 funding request(s)
- the discount rate in the Discount Rate section of your form calculated from the information you (or your consortium members) entered in your organization's profile in EPC
- your competitive bidding process, including your adherence to the 28-day posting requirement
- discrepancies within the funding request(s) or between the funding request(s) and/or supporting documentation.

The information on the FCC Form 471 may be sufficient to complete the review without applicant contact. The initial reviewer has access to the information you provided on the form along with any additional information submitted through RAL modifications. If more information is needed to complete the review, your initial reviewer must request it.

After preparing the necessary questions, the initial reviewer issues questions via EPC. You will be notified by email to let you know the questions are available. Starting with the FY2018 review process, your state E-rate coordinator will also be notified.

To access the review questions, you can click the link provided in the email. You can also:

- Log in to your account in EPC.
- Use the search function in the **FCC Forms and Post-Commitment Requests** section of your organization's landing page to locate your FCC Form 471.
- Click your form's application number to access the form.
- Click the **Review Inquiries** menu at the top of the page, then click the **Respond to Inquiries** button also at the top of the page to locate and respond to your questions.
- Read each question carefully. You may be asked to provide a Yes/No answer, a short response in a text field, or a file or scanned document.

NOTE: EPC has recently been updated to allow only one user to work on a specific inquiry at one time. Different users can still work on different inquiries simultaneously. One user can also allow another user to review and/or edit their work by saving the draft response and then exiting the inquiry.

In general, you have 15 days from the date of the email request 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 [Missing Information](#) guidance on the USAC website.)

- If USAC has not received a response – or receives only a partial response – after seven days, USAC sends you an email reminder and also notifies 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 do not 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.** 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:

- Removal of ineligible products and services
- Removal of ineligible recipients of service
- Addition of eligible recipients of service
- Reduction in number of months of service
- Reduction in amount of funding based on additional documentation you provided
- Revisions to contract start and/or end dates
- Changing from month-to-month services to contracted services
- Amending the establishing FCC Form 470 application number.

If we intend to modify or deny a funding request, your initial reviewer will notify you. You can provide additional information at this point to support your request but you must move quickly, as we do not stop the review process to wait for a response.

At this point, some applications will move directly to the funding wave process we use to issue our decisions, while others undergo a second step: Final Review.

Final Review

Final Review is a peer review 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 questions. If the questions you are being asked seem new or similar, it is likely that additional information is required that was not gathered during Initial Review. Make sure you understand what supplemental information is being requested and provide the information as quickly and accurately as possible.

Some applications go through a third level of review called Quality Assurance (QA). QA is an additional check to verify that all parts of the review were done correctly. 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, do not be alarmed if your application seems to move "backward" – that is, to an earlier review status. If you do see such a movement, monitor your email 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 FCC Form 471 and your Receipt Acknowledgment Letter (RAL) to make sure all of your entries are correct. If you find a mistake, you can submit a RAL modification in EPC. If your review has already started, you can submit any corrections directly to your reviewer using the reviewer's contact information provided on the PIA email or in EPC.
- Organize all of the documentation related to your application and have it readily available to assist you in answering any questions.
- Monitor your email 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.

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