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Universal Service
Administrative Co.

Schools and Libraries Program News Brief

April 5, 2019

TIP OF THE WEEK: Remember to respond promptly to any requests for information from USAC related to the review of your FCC Form 471. You can contact your reviewer with your questions about the information requested, and you can ask for an extension if you need more time to respond.

Commitments for Funding Year 2018

Funding Year 2018. USAC released FY2018 Wave 52 Funding Commitment Decision Letters (FCDLs) on April 4. As of April 5, FY2018 commitments total over \$2.19 billion.

On the date that FCDLs are issued, you can access your FCDL notification from the **Notifications** section of your landing page in the E-rate Productivity Center (EPC).

Register for Upcoming Webinars

Join USAC this spring for upcoming E-rate Program webinars.

On Wednesday, April 17, we will discuss Program Integrity Assurance (PIA) review. We will cover general information about the review process and explain how to navigate review inquiries in EPC. To register for the webinar in advance, [click here](#).

On Wednesday, May 15, we will provide information about the FCC Form 486. We will explain the purpose of the form, the requirements for filing the form, including information about Children's Internet Protection Act (CIPA) compliance, FCC Form 479 for consortium members and when to file. To register for the webinar in advance, [click here](#).

You will be able to ask questions about the presentation during the webinars using the questions box in the webinar platform. USAC staff members will respond verbally to questions of general interest at the end of each webinar.

Registration for both webinars is also available on the [Webinars](#) page. If you register but are unable to attend, you can click the registration link to watch a recording of the presentation.

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:

- 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, which is calculated from the information you or your consortium members entered in the 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 this review without contacting you. The initial reviewer has access to the information you provided on the form along with any additional information submitted through RAL modifications. However, if we need more information to complete the review, your initial reviewer must request it.

To conduct a review, the initial reviewer issues questions to you via EPC. You will be notified by email when the questions are available. We will also notify your state E-rate coordinator.

To access your 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.

Only one user can work on a specific inquiry at one time, although different users can work on different inquiries simultaneously. One user can also allow another user to review and/or edit their work by saving their 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 may 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 start other reviews while you work on your response, so they 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, you can ask to speak to a manager. You will not be penalized for doing so, 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 or ineligible recipients of service
- Reduction in number of months of service
- Reduction in funding based on additional documentation you provided
- Revisions to contract start and/or end dates
- Changing from month-to-month services to contracted services
- Correcting 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 respond quickly because we do not stop the review process to wait for a response.

At this point, some applications undergo a second step: Final Review.

Final Review and Quality Assurance

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 additional questions to gather required information that was not gathered during Initial Review. Make sure you understand what supplemental information is being requested and respond 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.

The review process is not linear. An application can be returned to an earlier stage of review because of work that was not completed correctly or information that is missing. In this case, your application may appear 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 through EPC or by using the reviewer's contact information.
- 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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