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Universal Service
Administrative Co.

Schools and Libraries Program News Brief

May 8, 2020

TIP OF THE WEEK: Be sure to monitor the contact information you provided on your Funding Year (FY) 2020 FCC Form 471. USAC will use this information to contact you if we have any questions or need more information about your application to complete our review process.

Commitments for Funding Year (FY) 2020 and FY2019

FY2020. This weekend, USAC will release FY2020 Wave 1 Funding Commitment Decision Letters (FCDLs). We will announce the details of this wave on the USAC website next week, and subsequent waves in the SL News Brief.

FY2019. USAC released FY2019 Wave 58 FCDLs on May 7. As of May 8, FY2019 commitments total just under \$2.34 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).

Overview of the PIA Review Process

[Program Integrity Assurance \(PIA\)](#) is the process USAC uses 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.

For those of you who have not already completed PIA review, here is a summary of the three steps in the process: Initial Review, Final Review, and Quality Assurance.

Initial Review

USAC assigns an initial reviewer to process your FCC Form 471. The information you provided on your form may be sufficient for the initial reviewer to complete your review. If not, 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, for example:

- 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; and

- discrepancies within the funding request(s) or between the funding request(s) and/or supporting documentation.

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

To access your review questions, you can click the link provided in the email. You can also navigate to the **Pending Inquiries** section of your organization's landing page in EPC and, using the drop-down menus, choose "FCC Form 471" for the **Type** and "2020" for the **Funding Year**.

Read each question carefully. The inquiry may require you 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 allow another user to review and/or edit their work by saving their draft response and then exiting the inquiry.

Please respond promptly to any PIA requests for information or documentation. Reviewers will continue their attempts to contact applicants to ensure that they are available to respond to inquiries. (See the [April 17, 2020 SL News Brief](#) for more information on the extension of PIA response deadlines.)

During the PIA review process, 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 more time to respond to questions. (Remember that PIA response deadlines have already been extended - see above.) 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. USAC will not penalize you 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

Based on the information supplied during the review, the initial reviewer may recommend that a funding request be modified or denied. 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, and
- correcting the establishing FCC Form 470 application number.

If we intend to modify or deny a funding request, your initial reviewer will notify you through EPC. You can provide additional information at this point, 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. The final reviewer checks each step of the Initial Review process 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.

As a result, you may be contacted by your initial reviewer with additional questions to gather required information that was not gathered during Initial Review. Make sure you understand the request for supplemental information 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. A QA reviewer will return an application to an earlier stage of review if it was not reviewed correctly or if information is missing. In this case, the status on the progress bar at the top of your FCC Form 471 may move to the left – 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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