

Schools and Libraries Program News Brief

August 28, 2020

TIP OF THE WEEK: Funding Year (FY) 2020 applicants who have received a funding commitment from USAC and whose services have started can certify an FCC Form 486. Service providers who have not already certified an FY2020 FCC Form 473 should do so as soon as possible. USAC cannot pay an invoice from either an applicant or a service provider unless both of these forms have been certified and approved.

Commitments for Funding Year (FY) 2020

FY2020. USAC released FY2020 Wave 17 Funding Commitment Decision Letters (FCDLs) on August 27. As of August 28, FY2020 commitments total over \$1.45 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).

BEAR and SPI Form Reminders for Entries in Date Fields

Some applicants and service providers have experienced automatic denials or manual reviews on line items where they have entered incorrect dates in their invoices (FCC Form 472, BEAR Form and FCC Form 474, SPI Form). This includes Funding Request Number (FRN) invoice line items for both recurring and non-recurring services. We are providing the reminders below to assist program participants with data entry of dates on invoice forms.

On both BEAR and SPI Forms, the **Customer Billed Date** field is for recurring services and the **Shipping Date to Customer** is for non-recurring services. A single FRN line item should have a date in one field or the other, but not both.

The date in the **Customer Billed Date** field for each line item should be the date of the customer bill, that is, the date of the bill sent by the service provider to the applicant. The customer bill will either be for the full cost of the service (if the applicant is filing BEAR Forms) or for the applicant's share of the cost (if the service provider is filing SPI Forms). **In all cases, this date should be the first date of service for that line item.** For example:

 An applicant wants to enter three line items on a BEAR Form, one for each month of recurring services in the first quarter of the funding year. The applicant should put the date of the customer bill they received from the service provider for July on the first line item, the date of the bill for August on the second line item, and the date of the bill for September on the third line item. Similarly, a service provider wants to enter three line items on a SPI Form, one for each month
of recurring services in the first quarter of the funding year. The service provider should put the
date of the customer bill they sent to the applicant for July on the first line item, the date of the
bill for August on the second line item, and the date of the bill for September on the third line
item.

If you enter the first day of the funding year for all three line items instead of the date of the actual customer bill for each line item, the second and third line items will either be automatically denied or flagged for manual review, and the processing of your invoice may be delayed.

Update on Processing Program Deadlines Due to COVID-19

On April 1, the FCC released an Order (<u>DA 20-364</u>) that temporarily waives and extends several E-rate filing and service implementation deadlines and provides all program participants an automatic 30-day extension to respond to most USAC information requests.

In most cases, applicants and service providers do not need to take any actions other than filing the appropriate form or request on or before the extended deadline. Below is a reminder list of the affected program and response deadlines and a note if any actions are necessary:

Waiver of the service delivery deadlines for non-recurring services and special construction

The September 30, 2020 service delivery deadline for non-recurring services – whether for FY2019 or a previous funding year – is waived and extended to September 30, 2021.

• Actions required: No action required. Applicants are not required to certify an FCC Form 500 in order to extend this deadline.

The June 30, 2020 special construction service delivery deadline – whether for FY2019 or a previous funding year – is waived and extended to June 30, 2021.

Actions required: No action required. Applicants were not required to certify an FCC Form 500

 or a Special Construction Deadline Extension Request (SCDER) if an FCDL had not yet been received – in order to extend this deadline.

Waiver of deadline for appeals and requests for waiver

The deadline to file appeals with USAC or the FCC, or waiver requests with the FCC, is now 120 days after the date of the USAC decision for program participants whose 60-day filing deadline would ordinarily fall between March 11, 2020 and September 30, 2020.

• **Actions required:** While no action is required, we suggest that appellants who file after what would have been their 60-day deadline add a statement to their appeal or waiver that they are filing on or before the extended (120-day) deadline.

Waiver of the invoice filing deadline

For all applicants and service providers whose invoice deadline falls between March 11, 2020, and October 28, 2020, the invoice deadline is automatically extended for 120 days regardless of whether the applicant or service provider already requested an extension of the deadline.

Actions required: No action required. USAC has already extended these deadlines. Program
participants can locate their extended deadlines using the <u>View FRNs with Extended</u>
<u>Deadlines</u> tool or the <u>FRN Status Tool</u>.

Applicants or service providers that file an invoice deadline extension request with an explanation of, and documentation supporting, their entities' inability to file invoices by the original deadline (e.g., dates of closure, difficulty securing the appropriate resources, etc.) will receive an additional 30 days to file their invoice.

Actions required: The applicant or service provider must open a customer service case in EPC, request an invoice deadline extension, explain the reason for the request, and upload the supporting documentation. You can find specific details in the <u>June 26 SL News Brief</u>.

Extending the procedural deadline for filing the FCC Form 486

Applicants whose FCC Form 486 deadline falls between March 11, 2020 and September 30, 2020, will have an additional 120 days to submit these forms without penalty.

• **Actions required:** No action required. USAC has already updated these deadlines in EPC. (The extended deadlines are not visible in any of our online search tools.) For more details, you can refer to the <u>June 12 SL News Brief</u>.

Note that there is no deadline extension for FY2020 FCC Forms 486. If USAC issued an FCDL on or before July 1, 2020 and your service start date is July 1, 2020, your FCC Form 486 deadline is still October 29, 2020. However, we will continue to issue FCC Form 486 Urgent Reminder Letters if we believe your form is late. This letter provides an additional 15 days to submit your FCC Form 486 without penalty.

Extending the timeframe for responding to USAC information requests

USAC will provide all program participants with an automatic 30-day extension to respond to information requests related to pending USAC appeals; invoices; pending FCC Form 500 requests, including service substitutions, Service Provider Identification Number (SPIN) changes, or funding request cancellation requests; and audits, including the Beneficiary and Contributor Audit Program (BCAP) and Payment Quality Assurance (PQA).

USAC will also provide all program participants with an additional, automatic 30-day extension for PIA requests.

This relief will apply to all information requests issued between March 11, 2020 and May 22, 2020, regardless of the funding year for which those requests relate.

• Actions required: None. For the most part, these extended deadlines have already passed.

Note that the summer contact period – the period when USAC puts the review of applications on hold when USAC cannot make a successful contact with the applicant's contact person or designee – will end on September 11, 2020. On that date, USAC will start attempting to contact applicants again, and the regular response deadline and extension request processes will resume.

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