



E-Rate News Brief

May 19, 2022

E-RATE TIPS:

- **Thursday, May 26, 2022 at 11:59:59 p.m. ET** is the E-Rate FCC Form 471 application filing deadline **for new Tribal library entities** to submit and certify their FY2022 applications with at least one new Tribal library listed as a recipient of service. See the March and April 2022 [E-Rate News Briefs](#) for more information.
- **If you plan to request a waiver** of the FY2022 application filing window deadline, **be sure to certify and submit your FCC Form 471 in EPC** before you file your waiver request with the FCC. Note that you will receive an out-of-window status notification after you certify your form.
- **June 30, 2022 is the last day to receive recurring services** for Funding Year (FY) 2021. If the same service provider will continue to provide your recurring service after June 30, you must use the Funding Request Number (FRN) approved for FY2022 when you are invoicing for recurring services that start July 1, 2022.
- **Visit our updated FAQ web page** to see Basic Maintenance of Internal Connections (BMIC) [frequently asked questions](#).

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Commitments for Funding Year (FY) 2022 and FY2021

FY2022. USAC released FY2022 Wave 4 Funding Commitment Decision Letters (FCDLs) on May 12. As of May 18, FY2022 commitments total over \$1.42 billion.

FY2021. USAC released FY2021 Wave 52 FCDLs on May 12. As of May 18, FY2021 commitments total over \$2.64 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).

Children's Internet Protection Act (CIPA) Reminders

In [last month's E-Rate News Brief](#), we discussed the certifications on the [FCC Form 486](#) (Receipt of Service Confirmation and Children's Internet Protection Act (CIPA) Certification Form). Several of the certifications refer to compliance with CIPA. We are providing the following reminders of the requirements for CIPA compliance so you can make the appropriate certification(s).

Requirements of CIPA

CIPA has three basic requirements:

1. Internet safety policy: Schools and libraries must adopt and enforce an internet safety policy that includes five specific elements and a technology protection measure or filter (see Item 2 below). If you already have an internet safety policy or acceptable use policy, you can amend your existing policy to include the required elements. The policy must address the following:

- Access by minors to inappropriate matter on the internet or World Wide Web;
- Safety and security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications;
- Unauthorized access including "hacking" and other unlawful activities by minors online;
- Unauthorized disclosure, use, dissemination of personal information regarding minors; and
- Measures designed to restrict minors' access to materials harmful to minors.

"Minor" is defined as any individual who has not attained the age of 17 years.

For schools, the policy must include monitoring the online activities of minors. Schools also certify that their internet safety policies have been updated to provide for educating minors about appropriate online behavior, including interacting with other individuals on social networking websites and in chat rooms, cyberbullying awareness, and response.

2. Technology protection measure: Schools and libraries must enforce the use of a technology protection measure (i.e., a filter or a technology that blocks or filters internet access) on all of their computers with internet access. The filter must protect against access by adults and minors to visual depictions that are obscene, child pornography, or – with respect to the use of computers with internet access by minors – harmful to minors. The filter can be disabled during use by an adult to enable access for bona fide research or other lawful purposes.

3. Public notice and public hearing or meeting: Schools and libraries must provide reasonable public notice and hold at least one public hearing or meeting to address the proposed internet safety policy. Additional hearings or meetings are not necessary – even if the policy is amended – unless required by state or local rules or by the policy itself.

- Certifying compliance with CIPA
- The administrative authority for the school or library must certify compliance with CIPA.

For a school, the administrative authority may be the school, school board, school district, local educational agency, or other authority responsible for administration of a school.

For a library, the administrative authority may be the library, library board, or other authority with responsibility for administration of the library.

The administrative authority can certify the status of its compliance with CIPA on the FCC Form 486 if it is applying for E-Rate discounts directly (in other words, if it is the billed entity).

If the administrative authority is not applying directly – for example, if it is a member of a consortium that applies on its behalf – the administrative authority certifies its compliance on the [FCC Form 479](#) (Certification by Administrative Authority to Billed Entity of Compliance with the Children's Internet Protection Act Form). The administrative authority then provides a copy of the completed FCC Form 479 to the entity applying on its behalf. That entity can then accurately make the appropriate CIPA certification(s) on its FCC Form 486.

Timing of compliance with CIPA

In the first year a school or library receives E-Rate funding for internet access and/or Category Two services, the school or library can certify that it is undertaking actions to be compliant with CIPA for the next funding year. In the second (next) funding year, the school or library must certify that it is compliant with CIPA, unless state or local procurement rules or regulations or competitive bidding requirements prevent the making of the certification. In the third funding year, the school or library must be compliant with CIPA.

Documentation of compliance with CIPA

Below are some examples of documentation that may be requested to demonstrate CIPA compliance during an audit. The school or library should retain copies of the documentation for each funding year where a CIPA certification is required. Note that documents must be retained for at least 10 years after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request.

- A copy of the internet safety policy.
- A description of the filter and a report or other documentation on the use of the filter. The documentation should show that the filter was installed and working during the funding year.
- Documentation that the school or library gave public notice and held a public hearing or meeting on the policy – for example, an advertisement of the meeting and a copy of the meeting minutes.
- Documentation of the adoption of the policy.
- Copies of the FCC Form(s) 479 and/or FCC Form(s) 486, as applicable.

If you have questions about this information or for additional help, you can contact USAC's Customer Service Center (CSC) at (888) 203-8100. You can also refer to the [CIPA guidance](#) document on the USAC website.

Responding to Program Integrity Assurance (PIA) Review Questions in EPC

In the [April 2022 E-Rate News Brief](#), we provided an overview of the PIA review process. In this issue, we are including details about receiving and responding to PIA questions in EPC.

Receiving your PIA questions

The PIA reviewer will send an email to let you know that questions are available through the EPC **News** tab.

The notification in the EPC **News** tab reads: **From the FCC Form 471 Review Team**. The notification includes identifying information from your form, along with your PIA reviewer's name, telephone number, and a hyperlink to your questions (the blue bar at the bottom of the notification).

TIP: Enter "471 Review Team" in the **News** search function and hit the Enter key to locate these notification(s) more easily.

You can also locate your questions in the **My Tasks** section of your landing page. The hyperlinked name for each task is "Respond to Notifications for FCC Form 471 [form number]."

The **News** item hyperlink will take you to the complete list of PIA questions, but the **My Tasks** hyperlinks each take you to an individual question. For example, if you receive five PIA questions, you will see a list of all five questions if you use the **News** search option, and five separate tasks if you use the **My Tasks** option.

If you submitted more than one FCC Form 471 that requires PIA review, you will receive a separate set of questions for each form. However, if the same question applies to all of your forms, your reviewer can link that question so that you only have to answer it once.

Accessing your questions

Click the hyperlink on the **News** tab in EPC to access the **Summary** page of the FCC Form 471, then click the **Review Inquiries** hyperlink to access your PIA questions.

The **Review Inquiries** page is the applicant's dashboard (repository) for all PIA questions for each application. Click on the hyperlink from the **Tasks** tab to access the dashboard directly. You can also select the **Records** tab, then **FCC Form 471**, then search for your FCC Form 471 number using the search function. When you locate your form, click the **FCC Form 471 Number** hyperlink and then the **Review Inquiries** from the top navigation.

You can perform the following actions from the **Review Inquiries** page by clicking the appropriate button at the top of the page:

1. Respond to inquiries.
2. Request an extension of time to respond. Submit a request to modify information on your form.
3. Responding to questions

1. Click on the "Respond to Inquiries" button to view and respond to your PIA questions.

When you click on this button, you will see the **Pending Inquiries** and **Submitted Inquiries** dashboards. These dashboards list the status of the PIA outreach, which includes the type of outreach, the date the reviewer sent the notification, the response due date, and the reviewer's name and telephone number. You will know if someone in your organization has viewed the inquiry because a blue eye icon will appear in the "Read" column.

- "Pending" inquiries are questions submitted by the PIA reviewer to the contact person.
- "Submitted" inquiries are responses you submitted to the PIA reviewer.

When you select a pending inquiry, a template is displayed listing the PIA question(s) associated with that inquiry. You can enter your answers within the template, upload supporting documentation (a single document or multiple documents), and/or provide additional narrative information.

The system allows you to begin to work on your answers and then save your work for later by clicking the "Save & Close" button. To return to your work, choose "Review Inquiries" while in the FCC Form 471 record.

- 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 the draft response as described above and then exiting the inquiry.

You must provide complete answers and respond to all of the questions. Contact your PIA reviewer if you are unsure of what to do or you need clarification.

- If you do not respond to your PIA reviewer's questions within seven days – or your response is incomplete – you will receive a reminder notification and your state E-Rate coordinator will also receive a notification.
- If you have not responded after 15 days and have not requested an extension (see below), we may process your application with the information on hand, which may lead to a reduction or denial of funding.

After you have finished your response, you can send it to the PIA reviewer by clicking the "Submit" button. Your submitted response will then appear in the **Submitted Inquiries** dashboard. To expand this dashboard, click the **Submitted Inquiries** header.

2. Requesting an extension of time to respond

You can request more time to respond to your PIA review questions. We will automatically grant a seven-day extension for your first request, and EPC will adjust your original 15-day response due date and display the result.

Subsequent extension requests are not automatic, but must be reviewed by a PIA manager. If you require a second extension to respond to your PIA review questions, please reach out to your reviewer to explain the reason for the second extension. If we grant your request, EPC will feature the extended date on the **Review Inquiries** dashboard. If we deny your request, our denial message will appear in the comments section at the bottom of the original PIA **News** notification.

3. Submitting a request to modify FCC Form 471 information

To provide additional information or correct existing information on your FCC Form 471 in advance or during the process of responding to PIA questions, you can submit modifications to your FCC Form 471 by clicking the "Submit Modifications Request" button on the **Review Inquiries** page.

Selective Review Overview

Each year, some applicants undergo a selective review as part of USAC's review of their FCC Form 471. [Selective review](#) is a separate component of the application review process, and can run concurrently with a PIA review. In general, the purpose of selective review is to verify that the applicant followed the required competitive bidding process and that it has the necessary resources to make effective use of the requested services. However, selective review may also verify compliance with other program rules.

Selective reviews take place at the billed entity level. If you as the billed entity are chosen for a selective review, we will review all the FCC Forms 471 that you certified for the funding year.

Below we will cover the process of receiving the selective review notification and the deadline for responding.

1. USAC issues the selective review questions.

If your billed entity is chosen for a selective review, the contact person on your forms will receive an email from portal@usac.org notifying them that a Selective Review Information Request (SRIR) is available in EPC. The subject line will include the FCC Form 471 application number (or application numbers, if the billed entity certified more than one) and the words "E-Rate Review Information."

You can access the SRIR by clicking the link provided in the email. After you log in to EPC, you will be able to access the SRIR.

2. You confirm receipt of the SRIR.

The reviewer will confirm with the applicant contact person that the SRIR was received. You can confirm receipt by calling or emailing the reviewer using the reviewer's contact information featured on the email notification.

3. You respond to the selective review request and provide the appropriate documentation.

You can enter answers to the selective review questions in the fields provided in the SRIR in EPC. The questions asked are generally the same for all selective reviews.

For answers that also require documentation, you can upload documents or files by clicking the **Choose File** link or the **+Add Document** link and following the instructions.

If USAC has additional questions, we will contact you with another inquiry through EPC detailing the information needed.

4. You can request an extension if needed.

As with other reviews, you can request an extension of time to respond by choosing the appropriate extension option in the SRIR. Your first request is granted automatically for an additional seven days. The contact person can ask for a second extension but that extension must be approved by USAC.

Summer Contact Period ("Summer Deferral") Starts May 27

USAC processes program forms and requests as promptly as possible in order to issue timely decisions. If information is missing or incomplete, we may request additional information and/or documentation about your form or request. During this time of year, our most common reason for initiating contacts is to obtain more information about your FCC Form 471 in order to complete Program Integrity Assurance (PIA) reviews.

PIA questions are posted in EPC. You will also receive an email from EPC notifying you to respond to the questions. Full- and partial-rights users on the organization's account can see and respond to the PIA questions. If we have questions for you, you can access them in several different ways:

- Click on the hyperlink in the email from EPC.
- Open the **Tasks** menu from any EPC page and choose the task that has a link to the questions.
- Review the **Pending Inquiries** grid on your EPC landing page to locate the questions.
- Open the **Review Inquiries** menu at the top of your certified FCC Form 471.

Starting May 27, if our first attempt to contact you is on or after May 27, and we do not receive a response to our questions, we will put your application on a deferred status and will continue the review of your application sometime after September 9. This is known as our summer deferral period, which extends from the Friday before Memorial Day (i.e., May 27, 2022) through the Friday following Labor Day (i.e., September 9, 2022). During this period, please note:

- You can always contact us or respond to our pending questions to restart the review of your application if you become available before September 9, and we encourage you to do so to expedite the review of your application.
- If the PIA reviewer has already contacted you and you wish to designate someone to answer questions in your absence, be sure to send your designee's contact information to your PIA reviewer. If the PIA reviewer has not contacted you and your designee will be checking your messages, be sure that you have provided written authorization for your designee to answer questions about your application.
- If the PIA reviewer makes contact with someone representing your organization but that person is not in a position to answer PIA questions, they should clearly state to the PIA reviewer that the review of your application should be put on hold until you are available.

If our first attempt to contact you was before May 27, the non-summer deferral PIA review process will continue, and you will be required to timely respond to PIA requests. Please respond promptly to any PIA requests for information or documentation. While you may continue to receive automated deadline notifications for such information requests, we are mindful of the current impact of COVID-19 and will be flexible if you are non-responsive or send incomplete responses.

Getting Ready for Invoicing

After USAC has processed your [FCC Form 486](#) (Receipt of Service Confirmation and Children's Internet Protection Act Certification Form), you or your service provider can begin the process of invoicing USAC for the discount share of the approved eligible services (see [Filing the FY2022 FCC Form 486](#) in last month's News Brief). USAC can process invoices from either the applicant or the service provider after the following have occurred:

- USAC has issued a Funding Commitment Decision Letter (FCDL) with a positive funding commitment;
- Services have started (USAC can process invoices for progress payments after review of the contract if it includes a specific payment schedule);
- The applicant has submitted, and USAC has successfully processed, an FCC Form 486; and
- The service provider has filed an [FCC Form 473](#) (Service Provider Annual Certification (SPAC) Form) for the relevant funding year.

There are two methods that can be used to invoice USAC. Once USAC has processed an invoice for a Funding Request Number (FRN), that method of invoicing must be used for that FRN for the remainder of the invoicing process.

Invoicing Method #1 – FCC Form 472

Applicants file the [FCC Form 472](#) (Billed Entity Applicant Reimbursement (BEAR) Form) if they have paid the service provider in full for the services and want to be reimbursed for the discount amount. For BEAR invoices, **the applicant must have paid the service provider in full** for the received equipment and/or services and before invoicing USAC.

Applicants [file BEAR forms online](#) in the Schools and Libraries (E-Rate) program legacy system. Billed entities will receive payment directly to their bank account. In order to begin direct BEAR payments, the applicant must have completed an FCC Form 498 to [obtain an applicant 498 ID](#).

Invoicing Method #2 – FCC Form 474

The service provider files the [FCC Form 474](#) (Service Provider Invoice (SPI) Form) if you have billed the applicant for the non-discount amount (the applicant's share of the cost) and want to be reimbursed for the discount amount. For SPI invoices, **the applicant must pay the service provider their non-discounted portion** for the received equipment and/or services before you can invoice USAC.

USAC will review the SPI Form and disburse the payment to the service provider if payment is approved. The applicant is always [required to pay the non-discount portion](#) of the costs for the equipment and/or services.

There are two options for completing and submitting the SPI Form:

- Service providers can [file online](#), or
- Service providers can [file electronically](#). USAC will set up electronic invoicing upon request and then service providers can submit invoicing information to USAC in a comma-delimited file.

Invoice Filing Deadlines

Invoices must be submitted no later than 120 days after the last day to receive service or 120 days after the FCC Form 486 Notification Letter date, whichever is later. Generally, the date is October 28 for recurring services and January 28 for non-recurring services.

Applicants and service providers may request and automatically receive a single one-time 120-day extension of the deadline to submit an invoice for the FCC Form 472 (BEAR Form) or FCC Form 474 (SPI Form). [Invoice deadline extension](#) requests must be submitted on or before the invoice filing deadline in order for the request to be considered timely filed. If the deadline to file an invoice or to request an invoice filing deadline extension is missed, a [request for waiver](#) of the invoice filing deadline must be filed with the FCC and approved before any additional payments can be paid.

Invoicing Reminders

Below are some reminders to help ensure you submit successful invoices.

- **Invoice USAC only for your FCC Form 471 approved eligible equipment/services**, in the correct quantity and rates, and delivered only to the approved Recipients of Service (ROS).
- Invoiced amount must be actual charges, not the amount committed through the E-Rate program.
- Manual calculations for prorated amounts must be accurate.
- Billed rates must not exceed the contracted rate. USAC will only pay up to the contracted rate.
- Make sure that all equipment purchased is installed and in use before the Service Delivery Date.
- Establish a process to prevent duplicate invoice submission.
- Invoices can be submitted until the Invoice Deadline Date.
- Request a one-time invoice deadline extension, even if you do not anticipate needing one, before the invoice filing deadline.
- Remove ineligible items (equipment and services not approved on FCC Form 471, for FY and ROS).
- Retain your supporting documentation and bills for all invoices for at least 10 years.
- Respond in a timely manner to all outreach to expedite your payment.

USAC's website has [video tutorials](#) on how to submit the FCC Form 472 or the FCC Form 474, a [webinar recording](#) and [slides](#) from the February E-Rate Invoice Training, and pages for the [FCC Form 472](#) and [FCC Form 474](#) to help you navigate the invoicing process.

E-Rate Training - Recordings Available on Demand

Below are on demand recordings from our April/May webinars.

Beginning Services Webinar

Thursday, June 9

2 p.m. to 3 p.m.

[Register](#)

Overview: This session gives applicants and service providers a high level overview of the next steps in the E-Rate process, after services are funded.

Office Hours for Tribal E-Rate Applicants (May 17)

- ◆ View a Recording
- ◆ Slide Deck

Overview: This session provides an opportunity for Tribal E-Rate applicants and consultants to ask the USAC E-Rate team questions regarding the FY2022 E-Rate funding application process and the recent E-Rate Tribal training sessions.

PIA and Selective Review Process Webinar (May 12)

- ◆ View a Recording
- ◆ [Slide Deck](#)

Overview. This webinar provides an overview of the Program Integrity Assurance (PIA) and Selective Review processes. After the presentation, attendees participated in a live Q&A session. This webinar is recommended for Applicants and Service Providers at all E-Rate experience levels.

Office Hours for Tribal E-Rate Applicants (April 19)

- ◆ [View a Recording](#)
- ◆ [Slide Deck](#)

Overview: This session provides an opportunity for Tribal E-Rate applicants and consultants to ask the USAC E-Rate team questions regarding the FY2022 E-Rate competitive bidding and funding application process and the recent E-Rate Tribal training sessions.

Establish a Consortium (April 12)

- ◆ [View a Recording](#)
- ◆ [Slide Deck](#)

Overview: This session provides an overview of the different roles and responsibilities for the consortium leader and members. It included a live Q&A session for registered attendees

E-Rate Information Session for Tribal Library Applicants (April 5)

- ◆ [View a Recording](#)
- ◆ [Slide Deck](#)

Overview: This session provides an overview of the E-Rate program and covers general topics such as the application process, the competitive bidding requirements, important program terms, eligibility, and program discounts.

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