



Program Integrity Assurance (PIA) and the Selective Review Processes

E-Rate Program Participant Webinar

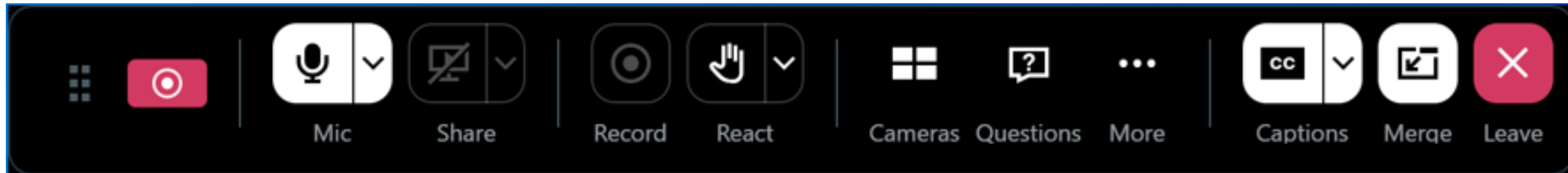
April 3, 2025

Disclaimer

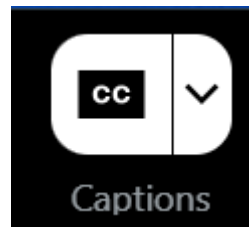
- To accommodate attendees, real-time closed caption is an option during this presentation.
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- **Please be aware, this webinar is being recorded.**

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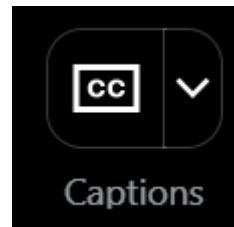
- Attendees control their own captioning



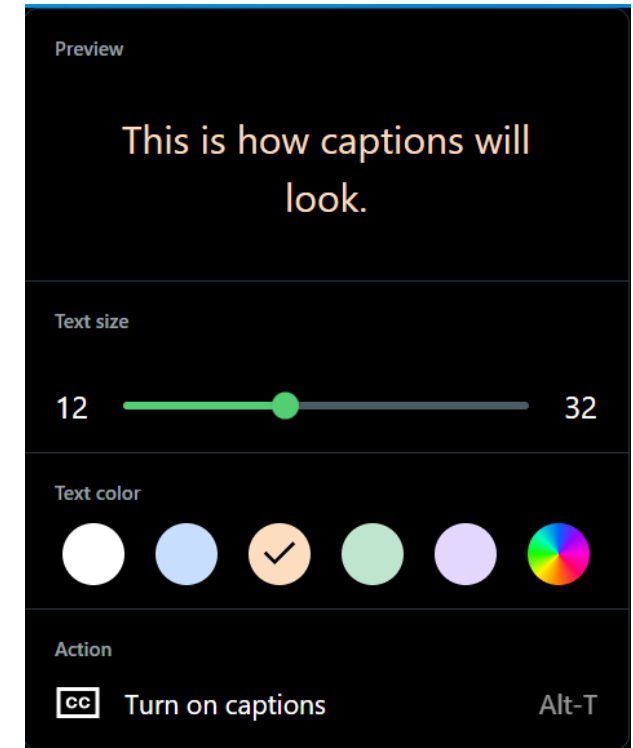
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Captions ON



Captions OFF



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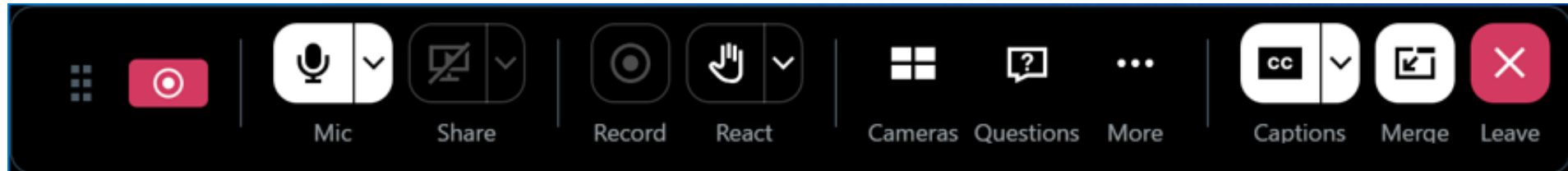
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- Double check your speaker settings
- Make sure you are connected to a source that works
- The audience is muted
- If your audio or slides freeze, restart the webinar



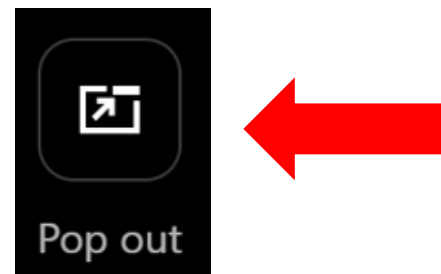
Housekeeping – Screen Views

GoTo Webinar

- Two ways to view the webinar
 1. Multiple windows open, can **merge** into one




2. One window for all content, can **pop out** into multiple windows



Housekeeping – Materials & Questions


- A copy of the slide deck is in the **Materials** section of the webinar panel



 **Materials**


- Enter questions at any time using the **Questions** box



 **Questions**

- If the slides freeze, restart the webinar

Questions ×



No questions yet
Questions you send and answers from the staff will appear here

Your question will be sent to staff Send

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E-Rate Customer Service Center (CSC)



Call us at (888) 203-8100

Monday – Friday 8 a.m. to 8 p.m. ET



Create a customer service case

1. Log in to the [E-Rate Productivity Center \(EPC\)](#)
2. Select the **Contact Us** link from the upper right menu on the landing page.

Meet the E-Rate Team



Lisette LaForge

Associate Manager | E-Rate



Nekose Wills

Senior Communications Specialist | E-Rate



Shawn Jensen

Associate Manager | E-Rate

Initial PIA Knowledge Checks

Agenda

- What is Program Integrity Assurance (PIA)?
- FCC Form 471 Review Process
- Preparing for a PIA Review
- PIA Inquiries
- Selective Review
- Funding Commitment Decision Letters
- Q&A

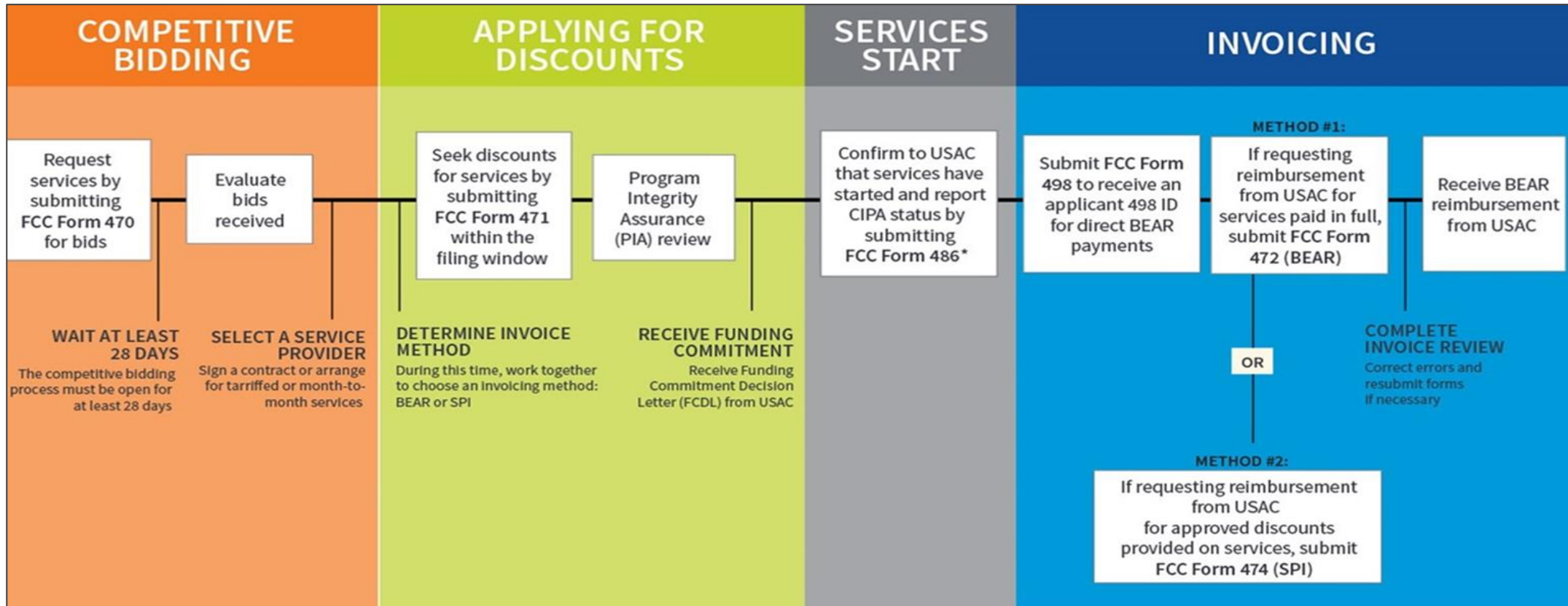
What is PIA?

- After you file and certify an FCC Form 471 within the filing window, Program Integrity Assurance (PIA) reviewers at USAC check the information on your form for completeness and accuracy and may have additional questions for you to answer.
- All applications go through an initial review and a final review, which may involve questions from PIA reviewers on one or more of the following topics:
 - Eligibility of the entities receiving service
 - Eligibility of the services requested
 - Discount calculations
 - Contracts
 - The competitive bidding process

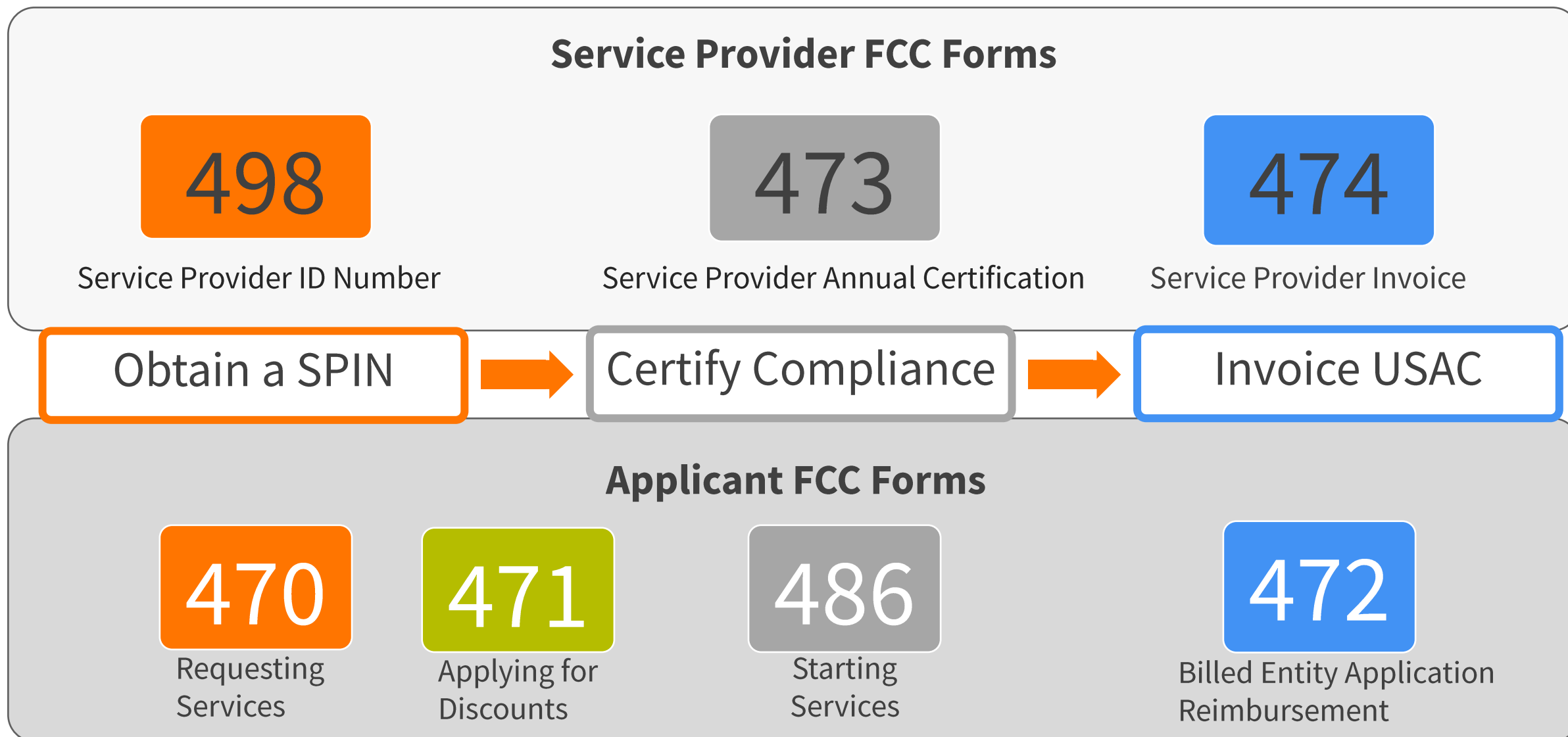
FCC Form 471 Review Process

Program Integrity Assurance (PIA) Review

- After applicants submit an FCC Form 471 during the filing window, PIA reviewers review the form to ensure it is complete and accurate.



E-Rate Forms



Know Your Role in the PIA Process and Beyond

- **Applicants**

- Determine services needed, file FCC Form 470 (and RFP, if desired)
- Run competitive bidding process
- Select the most cost-effective bid
- File FCC Form 471 requesting support
- **Respond** to the PIA
- **File** other applicant forms (FCC Forms 486, 472, 500, etc.)
- **Retain** documentation for at least **10 years** from the last date of service delivery

Know Your Role in the PIA Process and Beyond (Cont.)

- **Service providers**
 - **Respond** to FCC Form 470 and RFPs
 - **May assist** applicant
 - with FCC Form 471 after being selected
 - with responding to the PIA on technical services questions (but not competitive bidding)
 - **File** service provider forms (FCC Forms 473, 474, etc.)
 - **Retain** documentation for at least **10 years** from the last date of service delivery
 - **Contribute** to the Universal Service Fund (if applicable)
 - See [Service Provider page](#) of the USAC website

RAL Modification Request

- After certifying your FCC Form 471, double-check your application for accuracy while you wait for your PIA review.
- Correct any inaccurate or out of date information by submitting a [Receipt Acknowledgment Letter \(RAL\) Modification Request](#).
 - Within the FCC Form 471 record, navigate to **Related Actions**
 - Select **Submit Modification Request (RAL)**
 - Fill out the required information
- You can file a RAL Modification Request to update other information in advance of and during the PIA Review.



FCC Form 471 Status While Under Review

- Your form's status in the EPC will change as it progresses through the review process.
- Your application may revert to a previous status because this process involves multiple levels of review.

Review Status Bar



Pending Inquiries Status Bar

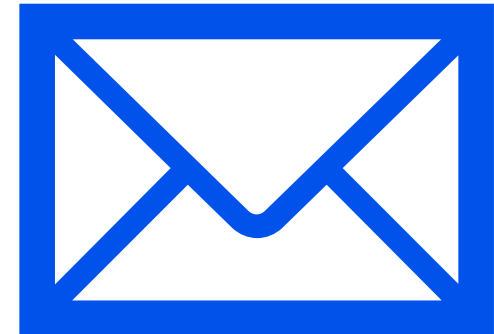
[Summary](#)
[Funding Requests](#)
[Review Inquiries](#)
[Deferral History](#)
[Discount Calculation](#)
[Entity Information](#)
[News](#)
[Related Actions](#)

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date ↓	Due Date	Extn(s) Approved	Status	Extn Requests

Monitor for PIA Review

- The contact person identified on the FCC Form 471 should:
 - Regularly monitor their email address
 - Regularly check their EPC account for PIA review questions
 - Respond to any questions promptly



Preparing for a PIA Review

Frequently Reviewed PIA Items

- Your PIA reviewer may contact you to verify:
 - [Eligibility of one or more of your entities \(e.g., schools, libraries or NIFs\)](#)
 - [Eligibility of the requested equipment and/or services and their category of service](#)
 - Compliance with program rules
 - Tribal Affiliation (if applicable)
- Common PIA requests for supporting documentation include:
 - Documents to validate entity information (e.g., surveys for alternative discount calculations, discount rates, student counts, eligibility)
 - Service Provider documents such as contracts, bills, and vendor quotes
- PIA reviewers may also request information or other documents to help clarify FCC Form 471 entries.

FCC Form 471 Modifications

- As part of the review process, PIA reviewers may be required to modify information on your funding request
 - For example, PIA reviewers may change student count or service type based on the information provided
- If a PIA reviewer discovers ineligible equipment and/or services in a funding request, applicants can choose to either remove the ineligible item(s) or create a separate funding request.

FCC Form 471 Modifications (Continued)

- PIA reviewers will alert you if they modify information on your funding request
 - You will receive an email notification
 - You will receive an EPC notification



Retain Documentation


- **Applicants and Service Providers** must [retain all documentation](#) for 10 years after the last day of the applicable funding year or the service delivery deadline for the funding request, whichever date comes later.
 - For example, for **recurring internet access service** for FY2025, both the applicant and the service provider must retain all records until at least June 30, 2036.
- Winning service providers must retain records related to the purchase and delivery of E-Rate eligible equipment, signed and executed contracts, bidding information, invoices, provision of services, and other matters relating to equipment and services.
- Records can be kept electronically.
 - Use file names and folder names that are specific and descriptive to help you locate them more easily.



Organize Documentation

- Save and organize copies of all documentation such as:
 - Competitive bidding documentation
 - Contracts
 - Network diagrams
 - Discount documentation
 - National School Lunch Program (NSLP) documentation
 - Community Eligibility Program (CEP) documentation
- Use the [E-Rate Program Applicant Document Retention List](#) as a guide.

Available for Public Use



Universal Service
Administrative Co.

[Schools and Libraries \(E-rate\) Program Applicant Document Retention List](#)

This list provides guidance regarding what E-rate Program related documents should be retained by applicants to comply with FCC [document retention](#) requirements. This guide provides document retention guidance to E-rate Program applicants. It includes items that do not apply to every applicant and is not an exhaustive list.

For forms filed in the [E-rate Productivity Center \(EPC\)](#), you can print a PDF copy of forms, letters and correspondence for your records.

1. FCC FORMS & CERTIFICATIONS

- 1.1. FCC Form 470
- 1.2. FCC Form 471
- 1.3. FCC Form 498 - applicants filing FCC Form 472 (BEAR)
- 1.4. FCC Form 472 - Billed Entity Applicant Reimbursement (BEAR)
- 1.5. FCC Form 479 - consortium members & consortium leaders only
- 1.6. FCC Form 486
- 1.7. FCC Form 500
- 1.8. Delivery confirmations for forms filed outside of EPC

2. USAC LETTERS

- 2.1. FCC Form 470 Receipt Notification Letter (RNL)
- 2.2. FCC Form 471 Receipt Acknowledgment Letter (RAL)
- 2.3. FCC Form 471 Out Of Window Letter (OOW)
- 2.4. Funding Commitment Decision Letter (FCDL)
- 2.5. Revised Funding Commitment Decision letter (RFCDLs)
- 2.6. FCC Form 486 Notification Letter
- 2.7. FCC Form 486 Urgent Reminder Letter
- 2.8. FCC Form 500 Notification Letter
- 2.9. FCC Form 472 (BEAR) Notification Letter
- 2.10. Quarterly Disbursement Reports (QDR)
- 2.11. Other USAC letters

usac.org/e-rate
Updated April 2021

Knowledge Check

PIA Inquiries

Responding to PIA Inquiries

- To avoid delays, provide:
 - Complete responses to all questions
 - All requested documentation
- Who can respond to PIA inquiries?
 - Applicants or authorized representatives of applicants
 - Service providers **can assist** applicants with PIA inquiries about the services being provided
- Contact your reviewer with questions

PIA Inquiries – EPC News Feed

- You will be notified via email and your EPC News feed if a PIA reviewer requests additional information.
- The News feed item labeled “From the FCC Form 471 Review Team” includes:
 - Today’s date
 - Response due date
 - Contact name
 - BEN Name
 - FCC Form 471 application number
 - A title for each inquiry
 - Your PIA reviewer's name and telephone number
 - A hyperlink to your application (the gray bar at the bottom of the notification)

TIP: Find notifications by searching “471 Review Team” in the **News** feed.

To Access PIA Inquiries in the EPC

- View your PIA inquiries within the FCC Form 471 record:
 - Navigate to **Review Inquiries**
 - Select **Respond to Inquiries**
 - Click on the blue hyperlink under **Name** to access the questions
 - Remember to read the information under **Outreach Type**
- Requests for documentation
 - Select the **Submit** button after uploading documents.



PIA Inquiry Status

- The dashboard lists the status of the PIA outreach
 - “Pending” inquiries are questions submitted by PIA to the contact person.
 - “Submitted” inquiries are responses you submitted to PIA.

Records · FCC Forms 471

REQUEST EXTENSION RESPOND TO INQUIRIES SUBMIT MODIFICATION REQUES...

Summary Funding Requests **Review Inquiries** Deferral History Discount Calculation Entity Information News Related Actions

Pending Inquiries

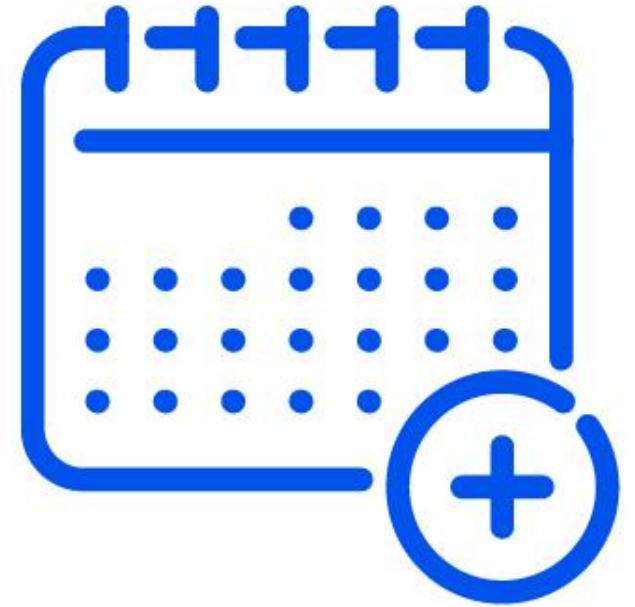
Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date	Due Date	Extn.	Status
		Other Issues	Modification Notification	PIA Reviewer	Assistant Program Analyst		3/23/2022 9:57 AM EDT		0	No Response Needed

Submitted Inquiries

Name	Outreach Type	Answered By	Assigned Date	Answered Date
Eligibility of Products and Services	Regular 15-Day	Applicant	3/21/2022 10:32 AM EDT	3/22/2022 1:56 PM EDT
Eligibility of Products and Services	Regular 15-Day	Applicant	3/21/2022 10:32 AM EDT	3/22/2022 2:01 PM EDT

Responding to PIA Inquiries

- You have **15 days** to respond to PIA inquiries.
- You may ask for a **one-time, seven-day extension**, which is **automatically granted**.
- Any additional extensions are considered on a case-by-case basis.



Requesting Additional Time

To request an extension for your response:

1. Navigate to the FCC Form 471 in the EPC
2. Choose **Review Inquiries**
3. Select **Request Extension**



Tips For Responding to Inquiries

- Complete **all** fields, entering “N/A” when not applicable.
- Do not open the same inquiry in multiple tabs or windows.
- If you encounter an “incomplete” warning:
 - Answer the questions again and verify that all fields are populated.
 - If these warnings persist, open a Customer Service Case (CSC) through EPC call CSC at 888-203-8100.



Tips for Responding to Inquiries (Continued)

- To address identical questions for an entity across multiple applications:
 - Provide the response on the first application
 - For subsequent inquiries, direct the reviewer to the first application containing the response



Common FCC Form 471 Application Errors

Problem	Tips to prevent the problem
Incorrectly classifying the category of service or equipment/service type on the FCC Form 470	<ul style="list-style-type: none"> • Determine the equipment/services you need and contact the CSC to verify correct classification of equipment and/or services. • Competitively bid for all necessary equipment and/or service types by filing an FCC Form 470 that accurately describes the equipment and service(s).
Filing an inaccurate FRN with the wrong equipment/service type	<ul style="list-style-type: none"> • Work with your service provider to ensure that equipment and/or services are accurately represented on the FCC Form 471. • Contact the CSC or your PIA reviewer with any questions.
Failing to remove ineligible services/equipment	<ul style="list-style-type: none"> • Work with your service provider to determine whether your requested equipment and/or services are 100 percent eligible. • Remove any ineligible amounts when creating your FRN(s).

PIA Verification of Mixed Eligibility

- Equipment and/or services may be **fully, partially** or **conditionally** eligible.
- Eligibility of equipment and/or services may vary from year to year based on the Eligible Services List.
- “Mixed eligibility” refers to products and services for which **only a portion** is eligible for discounts under the E-Rate program.



PIA Verification of Mixed Eligibility (Continued)

- In general, a cost allocation (separating the eligible and ineligible costs), is required if equipment and/or services :
 - Contains both eligible and ineligible components
 - Include in your bid what the eligible percentage is, if not 100 percent
 - Is utilized for eligible and ineligible uses
 - For example, a server that is used for both caching (eligible) and video distribution (ineligible)
 - Is delivered to both eligible and ineligible locations
 - For example, broadband service delivered to a school run by a church (eligible) AND the church office (ineligible)

PIA Verification of Mixed Eligibility (Continued)

- There is no single approved method to allocate eligible and ineligible costs.
- Your method must use tangible criteria that result in a reasonable allocation with supporting documentation showing a clear cost delineation.
- If 90 percent or more of an applicant's internet service is used for eligible purposes, there is a presumption that other on-campus ineligible purposes are ancillary and do not require cost allocation (e.g., ancillary use by ineligible pre-K children in an eligible building).

Selective / Competitive Bidding Review

Selective Review: Introduction

- Some applications undergo additional review further to a PIA Review.
- USAC may request more detailed responses than those required in a PIA review.
- Selective reviews:
 - Include all aspects of the competitive bidding process
 - Are independent of other reviews conducted under PIA which may or may not still be in progress



Selective Review: Process

- USAC sends a **Selective Review Information Request (SRIR)** email to the FCC Form 471 contact informing them that their entity has been chosen for selective review.
- The email provides information about how to submit a response and includes a link to access the SRIR in the EPC.



Selective Review: Receipt

- If you receive a Selective Review Information Request (SRIR), you should:
 - Confirm receipt of the SRIR by contacting the reviewer named in the request
 - Provide a complete response and all requested documentation to avoid delaying the review
 - Label each document with Funding Request Numbers (FRNs) and descriptions that identify them



Selective Review: Response

- Who can respond to Selective Review Information Requests?
 - Applicants or authorized representatives of applicants (EPC Account Administrators and Full-Rights users)
- Contact your reviewer with any other questions.



Funding Commitment Decision Letters

Funding Commitment Decision Letter (FCDL)

- When the PIA review is complete, applicants and service providers receive a **Funding Commitment Decision Letter (FCDL)** in their EPC News Feed that they should review carefully.
- The FCDL includes:
 - Approved funding amounts
 - Modified or denied funding amounts along with the reason(s) for the changes
 - Next steps in the E-Rate process

FCDL Terms Defined

- **Pre-Discount:** Total cost of the equipment and/or services before the E-Rate discount is applied.
- **Discount Amount:** Pre-Discount Amount *times* the discount rate.
- **Discounts & Invoicing Amounts:**
 - Total Eligible Charges *times* the discount rate equals the FRN committed amount on the FCDL.
 - The “Commitment Request” in the EPC is the amount eligible for funding and payment through the E- Rate program and for payment during the invoicing process.
- **Non-Discount Amount:** Amount applicant pays for the equipment and/or services using **non**-E-Rate funds.
 - This cannot be paid or credited by the service provider.

After Receiving the FCDL

- After the FCDL is delivered, applicants can:
 - Discuss service details with your service provider(s)
 - File the [FCC Form 486](#) once services have started
- If applicants or service providers disagree with one or more of the decisions in the FCDL, they can [appeal](#) to USAC
 - Appeals must be lodged within 60 days of the date of the letter.
 - Appeal decisions are delivered via **Revised Funding Commitment Decision Letters (RFCDLs)**.

File Service Provider Annual Certification (SPAC)

- Service providers file an FCC Form 473 (Service Provider Annual Certification (SPAC) Form) to certify that they will comply with Schools and Libraries (E-Rate) program rules and guidelines.
- **FCC Form 473 Rules:**
 - A new form must be on file for **every funding year** service providers participate in E-Rate.
 - The form is required for each Service Provider Identification Number (SPIN)/498 ID **every funding year** of participation.
 - Forms are filed in the E-Rate Productivity Center (EPC).
 - Only full-rights EPC users can certify FCC Form 473.
 - **The form must be on file before USAC pays any invoice** (BEAR or SPI).
 - Use the **EPC service provider record** to review Funding Years for which the form was completed.
- For more information on the FCC Form 473/SPAC form, review Module 2 of the “Service Provider Course 1” [e-Learning Module](#).

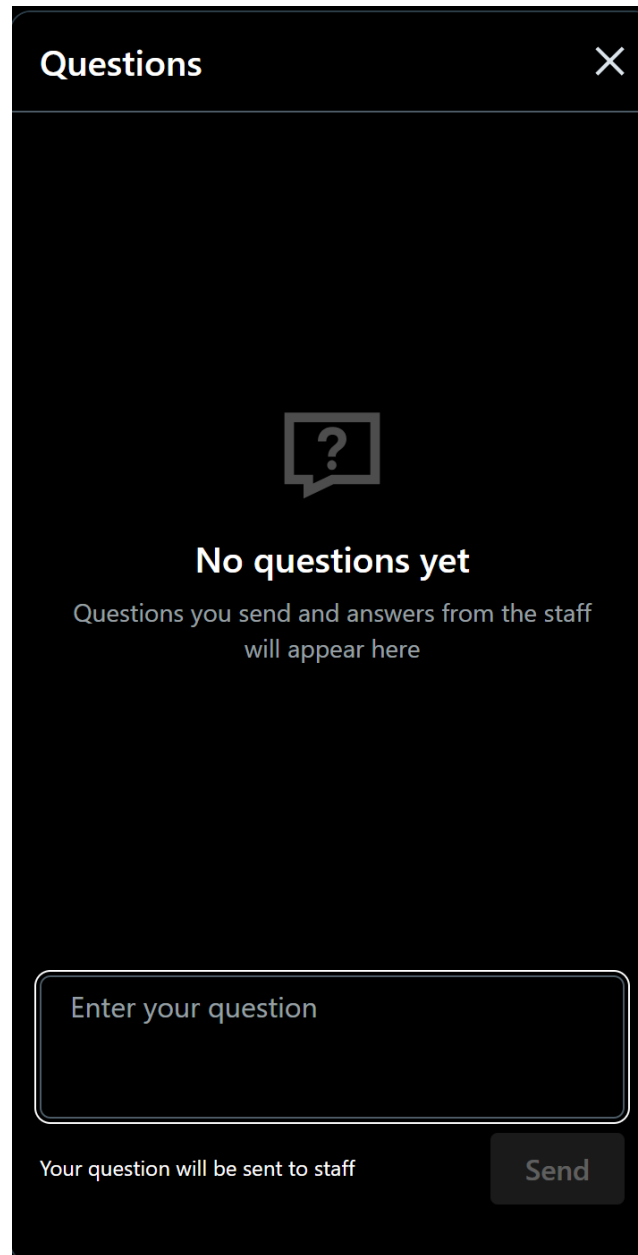
Resources

- [E-Rate Service Provider Webinar](#)
- [E-Rate Fall Training: Pre-Commit Process](#)
- [Eligible Services List \(ESL\)](#)
- [Competitive Bidding Infographic](#)
- [Program Integrity](#)

Knowledge Check

Live Q&A

- Submit your questions about today's topics:
 - FCC Form 471 Review Process
 - Preparing for a PIA Review
 - PIA Inquiries
 - Selective Review
 - Funding Commitment Decision Letters



Questions

?

No questions yet

Questions you send and answers from the staff will appear here

Enter your question

Your question will be sent to staff

Send

Q&A Tips

- ✓ Type your queries into the “Questions” box in your webinar control panel.
- ✓ Write in full sentences.
- ✓ Ask one question at a time.
- ✓ Click the box to expand it and see all the written answers.

Questions?

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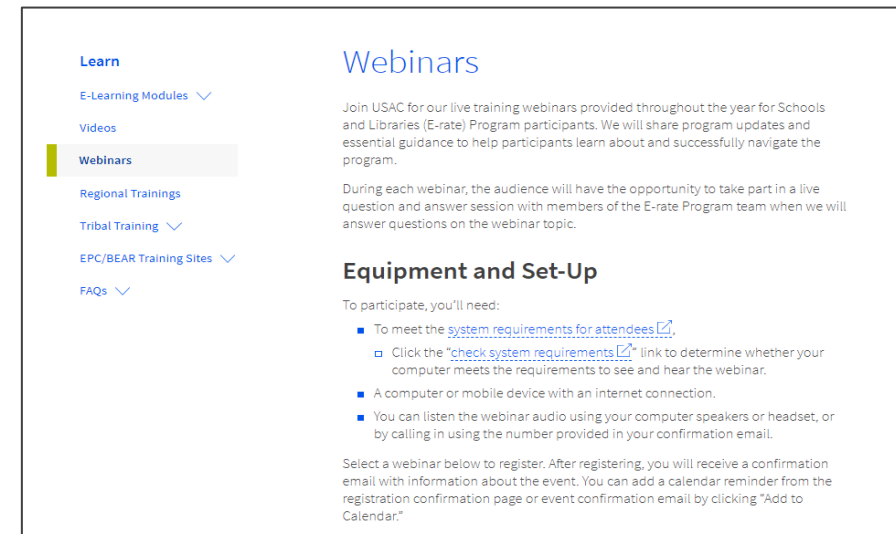


Create a customer service case

1. Log in to the [E-Rate Productivity Center \(EPC\)](#)
2. Select the **Contact Us** link from the upper right menu on the landing page.

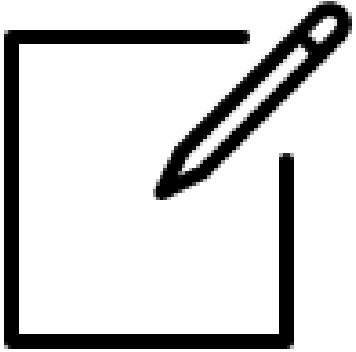
Upcoming Webinars

- Our next webinar is on **May 15, 2025**
- Beginning E-Rate Services Webinar
 - Recommended for applicants and service providers
 - Suitable for all E-Rate experience levels
- Please visit the E-Rate [Webinars](#) page for additional information.



The screenshot shows a webpage with a navigation menu on the left and main content on the right. The navigation menu includes: Learn, E-Learning Modules (with a dropdown arrow), Videos, Webinars (highlighted with a yellow bar), Regional Trainings, Tribal Training (with a dropdown arrow), EPC/BEAR Training Sites (with a dropdown arrow), and FAQs (with a dropdown arrow). The main content area is titled "Webinars" and contains the following text: "Join USAC for our live training webinars provided throughout the year for Schools and Libraries (E-rate) Program participants. We will share program updates and essential guidance to help participants learn about and successfully navigate the program." Below this is a paragraph: "During each webinar, the audience will have the opportunity to take part in a live question and answer session with members of the E-rate Program team when we will answer questions on the webinar topic." The next section is titled "Equipment and Set-Up" and states: "To participate, you'll need:" followed by a list of requirements: "■ To meet the [system requirements for attendees](#)."; "□ Click the [\"check system requirements\"](#) link to determine whether your computer meets the requirements to see and hear the webinar."; "■ A computer or mobile device with an internet connection."; "■ You can listen the webinar audio using your computer speakers or headset, or by calling in using the number provided in your confirmation email." At the bottom, it says: "Select a webinar below to register. After registering, you will receive a confirmation email with information about the event. You can add a calendar reminder from the registration confirmation page or event confirmation email by clicking \"Add to Calendar.\""

Share Your Thoughts



- We want to hear about your webinar experience.
- A survey will appear on your screen at the end of the webinar.
- If you are not able to complete the survey today, a link to it will be emailed to you within two business days.
- We appreciate your feedback!

Thank You!





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