Universal Service Administrative Co.

USAC

Schools and Libraries Cybersecurity Pilot Program Newsletter

October 7, 2024

E-Rate Productivity Center Maintenance – October 10

The E-Rate Productivity Center (EPC) will have scheduled system maintenance on Thursday, October 10 from 7-10 p.m. ET. The FCC Form 484 Part 1 will be unavailable during that period.

Clarification for Applicants on Red Light

The Federal Communications Commission (FCC) is clarifying that entities on Red Light status must resolve outstanding debts on or before November 1, 2024 to be able to participate in the Pilot Program. As stated before, applicants will not be considered for the Pilot Program if they are on Red Light or share a Taxpayer Identification Number (TIN) with an entity on Red Light. To confirm that your entity is eligible to participate in the Pilot Program, visit the FCC's CORES webpage, to check your financial status with the FCC. If your entity is on Red Light, you must pay the amount(s) owed and resolve the Red Light status on or before November 1, the date the Pilot Program application window closes, to be eligible to be selected as a Pilot Program participant.

FCC Form 484 Part 1 Application Tips

Q: Can you clarify what information you are looking for in Question 3.2, which asks whether an applicant or consortium member currently receives, or expects to receive, cybersecurity funding from any other federal, state, local, Tribal or other cybersecurity program or source? Is this question aimed toward the proposed Pilot funding that is being requested? Or does it relate to funding of any cybersecurity product or service?

A: This question will help the FCC better understand what other kinds of cybersecurity funding may be available to schools and libraries to pay for Pilot Program equipment and services and whether an applicant receives (or expects to receive) funding from another source that is, or will be, used to support the same equipment or services that are being requested through the Pilot Program.

For example, if an applicant is receiving funds to support cybersecurity equipment and services pursuant to the Infrastructure Investments and Jobs Act, and the funding is being used to pay for the same equipment or services that are being requested through the Pilot Program, it should answer in the affirmative for Question 3.2.

As the FCC has reminded applicants, Pilot participants are not precluded from using other sources of funding to pay for cybersecurity equipment and services (including for paying the non-discount share), but they may not receive Pilot funding for the same cybersecurity equipment and services, or the same portion of cybersecurity equipment and services, funded through other sources. FAQ 2.2)

Q: What is the difference between a recommendation and a best practice for purposes of answering Questions 2.1 and 3.4? Isn't Question 2.1 a subset of Question 3.4?

A: For purposes of the FCC Form 484 Part 1, recommendations are broader than best practices, in that they reflect any cybersecurity guidance provided by the Education Department or CISA, not just guidance pertaining to K-12 schools and libraries. In that sense, best practices could be considered a subset of recommendations. To the extent an applicant has begun implementing any of the best practices identified by the Education Department or CISA, it may answer yes to both 2.1 and 3.4.

Q: Can you clarify the difference between Question 5.2 and 5.3 and how each may trigger the gift rule?

A: Question 5.2 asks whether a service provider will be required to include any no-cost cybersecurity equipment and/or services in its bid. Question 5.3 asks whether the applicant plans to require service providers to utilize any free or low-cost tools provided by Department of Education, CISA or other agencies.

Because free and low-cost tools are provided by the Department of Education, CISA, or another federal, state, local, or Tribal government source of funding, they do not raise the same competitive bidding and gifts restriction issues as no-cost cybersecurity equipment and services provided by service providers.

The free and low-cost tools referenced in this question are the same as those identified in Question 4.3.

Q: How will the budget of a school district or consortia be calculated if only a subset of its members are included in the FCC Form 484 Part 1 applications? For schools, will it be based on the actual number of students associated with the participating schools?

A: The budget will be based on the student count associated with the selected entities. The FCC has put together a Budget Examples resource guide to help applicants understand how budgets will be calculated.

Application Resources

For step-by-step instructions about how to certify an FCC Form 484 Part 1 application and for additional guidance

about the application process, please visit the <u>FCC Form 484 Part 1 User Guide</u>. USAC-hosted <u>webinar recordings</u> are also available to help applicants understand the Pilot Program and the FCC Form 484 Part 1 application requirements.

Upcoming Trainings

Schools and Libraries Cybersecurity Pilot Program Overview for Service Providers October 15, 2024 at 3 p.m. E.T. – <u>Register</u>

Pilot Program Resources

To learn more about the cybersecurity issues impacting schools and libraries, review the <u>Cybersecurity Resource</u> <u>Guide</u> from the Department of Education and the FC;C and visit the Department of Homeland Security's <u>Cybersecurity & Infrastructure Security Agency</u> website and the Department of Education <u>Cybersecurity</u> <u>Preparedness</u> website.

To learn more about the Pilot Program, including its timeline and trainings, visit USAC's <u>Cybersecurity Pilot Program</u> webpage and sign up for <u>Pilot Program emails</u>. Visit the <u>Learn</u> section of our website to find newsletters, webinars, and FAQs. Interested applicants can also visit the <u>FCC's Cybersecurity webpage</u> for further resources.

Need Help? Contact Us! Call us at (888) 203-8100 Monday through Friday, 8 a.m. to 8 p.m. E.T. or submit a case in EPC.

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