# FY2026 E-Rate Roadshow

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## **VISION**

To create a world-class educational system that gives students the knowledge and skills to be successful in college and the workforce, and to flourish as parents and citizens

## **MISSION**

To provide leadership through the development of policy and accountability systems so that all students are prepared to compete in the global community





#### State Board of Education STRATEGIC PLAN GOALS



**ALL** Students Proficient and Showing Growth in All Assessed Areas

**EVERY** School Has Effective Teachers and Leaders





**EVERY** Student Graduates from High School and is Ready for College and Career

Uses a World-Class Data System to Improve Student Outcomes





**EVERY** Child Has Access to a High-Quality Early Childhood Program

**EVERY** School and District is Rated "C" or Higher





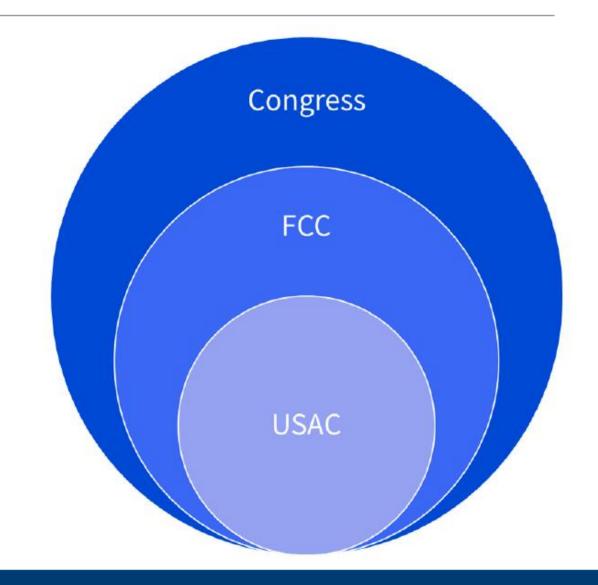


## Agenda

- I. E-Rate Overview
- II. Application Process
  - a. New C2 Budgets
- III. Transitioning Services
- IV. Admin Window
  - a. NSLP/CEP
  - b. Student Count
- V. Category 1 & 2
  - a. ESL
  - b. Budget
- VI. Application Process
  - a. Form 470
  - b. State Guidelines / Reverse Auction / Contracts
  - c. Form 471
  - d. Form 486 / CIPA
  - e. Form 500
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- VII. Document Retention
- VII. EPC Forms Submission Process Examples
  - a. Form 470
  - b. Form 471
  - c. Form 472 (BEAR)

### **Overview**

- Who makes the rules?
  - Congress wrote the Telecommunications Act of 1996, which directed the Federal Communications Commission (FCC) to establish the E-Rate Program and other programs.
  - The FCC issues orders that set rules and policies for the program and gives direction to the Universal Service Administrative Company (USAC) through orders.
  - USAC is responsible for the day-to-day administration of the E-Rate Program.





## **Program Overview**

Provides funding to help schools and libraries obtain affordable telecommunications and internet access.

FY2025 Program Cap

\$5.06B

#### **Eligible Applicants**

Public and private schools (K-12), libraries, and groups of schools and libraries (e.g. consortia, school districts, library systems), as well as Tribal schools, libraries, and Tribal college and university (TCU) libraries that also serve as a public library

#### **Eligible Services**

Schools and libraries are eligible for discounts between 20% and 90% of the costs of eligible equipment and services. The applicant pays the remaining share (e.g.., a 90% applicant pays \$100 on a \$1,000 request). \*Discount varies based on the school or library's level of poverty, urban/rural status, and the type of service.

#### Category 1

Services that support connectivity to schools and libraries. For example, data transmission and Internet access service, including special construction services for network builds.

#### **Category 2**

Services that support connectivity within schools and libraries. This includes internal connections (e.g., routers, cabling, or other equipment needed for a Wi-Fi network); managed internal broadband services (MIBS), and basic maintenance of internal connections (BMIC).

#### **Top C1 Purchases:**

- Leased lit fiber
- Internet access provided over fiber or copper
- Commercially available internet access
- Cable provider internet
- Satellite internet

#### **Top C2 Purchases:**

- Internal Connections (IC): Cabling, routers, switches, modems, wireless access points, right to use licenses
- Basic Maintenance of Internal Connections: Repair and upkeep of eligible IC
- Managed Internal Broadband Services:
   Managed Wi-Fi agreements

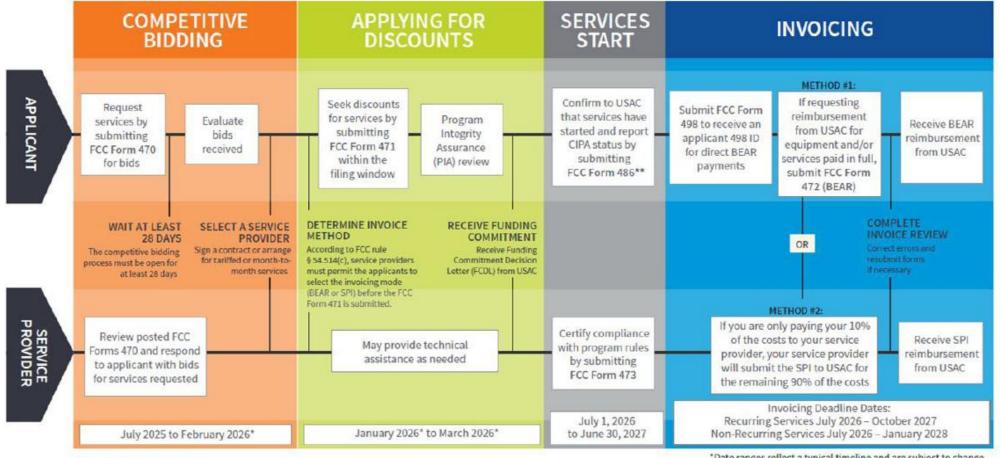


## Importance to Mississippi

- \$884,534,552.47 committed to Mississippi since 1998
- \$23,192,952.18 has been committed to Mississippi just for 2025
- The average discount for schools and libraries is 85%
- Every public school district in the state participates in E-Rate
- 98% of public libraries participate in E-Rate
- 100% of public schools have broadband internet fiber connections



## E-Rate Application Process: FY2026



#### FOR MORE INFORMATION:

\*Date ranges reflect a typical timeline and are subject to change.

- Website: The application process is broken down in detail for both applicants and service providers on the Schools and Libraries Program website (www.usac.org/sl).
- Glossary of Terms: Definitions for program terms and acronyms.
- \*\*Consortium members report their CIPA status by submitting the FCC Form 479 to their consortium leader. The consortium leader then files the FCC Form 486.
- To adjust funding commitments and/or modify the dates for receipt of services after the FCDL is issued, file the FCC Form 500.



### **Tools & Resources**

- USAC E-Rate website
  - https://www.usac.org/e-rate/
  - Announcements
  - Eligible Services List
  - E-Rate News Brief
  - Tools
  - Webinars
  - FAQs
  - Interactive User Guides



# **FY26 E-Rate Program Updates**



## **FY2026 – 2030 Category 2 Budget**

- FY2026 is the first year of the FY2026-2030 Funding cycle.
- Unused funds from the FY2021 2025 Category Two (C2) budget will not roll over to the FY2026 - 2030 funding cycle.
- The E-Rate C2 Budget Tool FY2021+ provides data on the FY2026 2030 C2 budget cycle. It is available on the Tools page along with a video on how to user the tool and a glossary of terms.
  - The tool will be updated to show C2 budget forecast data for the FY26-30 C2 budget cycle.
  - Applicants will be required to validate their student counts in the first year they apply for C2 support during the FY26-30 cycle.



## FY2026 – 2030 C2 Budget Cycle Updates

#### FY2021-2025 C2 Budget Cycle

#### Libraries

- \$4.50/square foot
- \$25,000 funding floor
- Tribal libraries were eligible for up to \$55,000

#### Schools

- \$167/student
- \$25,000 funding floor

#### FY 2026-2030 C2 Budget Cycle

#### Libraries

- \$5.43/square foot
- \$30,175 funding floor
  - This means a library with less than 5,558 square feet (\$5.43/square foot \* 5,557 square feet = \$30,174.51) receives the funding floor of \$30,175.
- Tribal libraries are eligible for up to \$66,385.
  - This means a Tribal library with less than 12,226 square feet (\$5.43/square foot \* 12,225 square feet = \$66,381.75) receives the Tribal library funding floor of \$66,385.

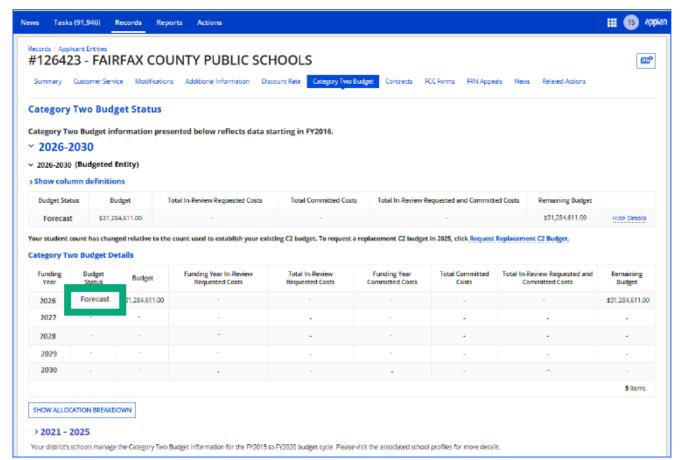
#### **Schools**

- \$201.57/student
- · \$30,175.00 funding floor
  - This means a school with fewer than 150 students (\$201.57/student \* 149 students = \$30,033.93) receives the funding floor of \$30,175.



## Establishing Your C2 Budget for this Cycle

- Update your entity profile in EPC during the Administrative Window
  - This information determines your discount
  - For instructions, please see the <u>Admin</u> <u>Window eLM</u>.
- Forecast Budget: Beginning in the FY2026-2030 budget cycle, all entities will have a Forecast budget status based on the information in their EPC profile. This means that any updates you make to the entity profile will automatically reflect in an updated budget amount, without the need to request a replacement budget.





## Establishing Your C2 Budget for this Cycle

- **Preliminary Budget:** The entity has **certified** a Form 471 application within the FY2026-2030 C2 budget cycle. This means that the entity has certified the accuracy of the budget data currently in the entity profile.
- **Confirmed Budget:** Program Integrity Assurance (PIA) review of FY2026-2030 C2 Form 471 application is **complete**. The C2 budget in the entity profile is now **fixed**. It can only be changed via an Appeal for the current FY. Beginning in FY2027, the entity can request a replacement C2 budget if the student count has increased for the next year.



### **Transitioning Services**

 Transition of Services is when an applicant changes from one service and/or one service provider, to another during a funding year. The actual cutover dates may occur during the middle of the funding year and may change from the original planned transition dates.

#### Notifying USAC & Updating your FCC Form 471:

- FCC Form 471 is in review: Applicant should submit a RAL Request
- FCC Form 471 has been Processed: Applicant should submit a SPIN Change or Service Sub Request
  - Changing Service Providers: Processed through a SPIN Change Form.
  - Changing Services: Processed through the submission of a Service Substitution Form.



### Funding Caps – Devices and Internet

- Program rules prohibit the funding of duplicative services (including the same service to the same locations at the same time.)
  - The applicant can apply for funding related to services from the incumbent and the new provider that will be provided during the applicable funding year providing planned cutover dates for each provider.
  - Ensure that the two FRNs for the transitioning service do not request funding for a time period that exceeds 12 months (e.g., if one FRN requests funding for four months, then the other FRN should only request funding for eight months.) The **service period for these two FRNs cannot overlap** and the **total service period** of these two FRNs cannot **exceed 12 months**.



## Transitioning Services: Example

#### Cutover on the **Same** Date

- Submit two FRNs on the same FCC Form 471 application for all of the circuits.
  - One FRN for the existing service.
  - One FRN for the new service.
  - The cutover date that the applicant previously established with the service provider(s) will inform the service start and end dates for these FRNs.

#### Cutover on **Different** Dates

- The applicant should take into account the various transition dates for each circuit when determining how many FRNs they will submit, grouping those with a similar transition date together on the same FRN.
- Submit two FRNs for each circuit.
  - One for the existing service.
  - One for the new service.
  - The cutover date that the applicant previously established with the service provider(s) will inform the service start and end dates for these FRNs.



### **Transitioning Services: Spin / Service Substitute**

- Narrative: Explain that due to a Transition of Service issue, the applicant seeks to alter the service start and end dates for specific FRNs. The narrative should include the existing service FRN(s), and new service FRN(s), in addition to the specific changes the applicant would like made to the service start and end dates (i.e., cutover dates). An example narratives:
  - Service Provider Name1 (SPIN1) will provide Ethernet at 3G starting on 7/1/2026 and ending on 11/30/2026. Service Provider Name2 (SPIN2) will provide Ethernet at 20G starting on 12/1/2026 to 6/30/2027.
- Submit forms as soon as the cutover date is verified so that USAC can make the necessary adjustments to the affected FRNs.
- SPIN EPC Change User
- EPC User Guide: Service Substitutions



# **Administrative Window**



### **Admin Window**

- The administrative window allows applicants to update their profiles in the E-rate Productivity Center (EPC).
  - Will close shortly before the Funding Year (FY) 2026 FCC Form 471 application filing window opens.
- Why is there an administrative window?
  - Libraries and consortia depend on static student counts to accurately calculate their discounts.
  - For consistency, certain entity information cannot be changed during the application filing window.



### **FY26 Admin Window**

- Admin open for 2-3 months prior to Form 471 window
  - Open now October 15, 2025 January 2026
- Used for:
  - E-Rate discounts
    - NSLP
    - CEP -- 25%
    - Alternative method
  - Category 2 budgets
    - Different from enrollment data
    - Change budget only if there is an increase
- \*\*Admin Window changes from year to year



### **Admin Window**

### Entity Profiles

Update information on parent and child entities

#### Contract records

- These can be created after the admin window closes.
- File these requests BEFORE Form 471 is started

#### C2 budget tool

 This tool will show updated C2 budgets the day after you change your profile information.

#### School districts with ten or fewer schools

 We recommend that you enter your student counts individually by school to maximize the number of options available for your C2 budget calculation.

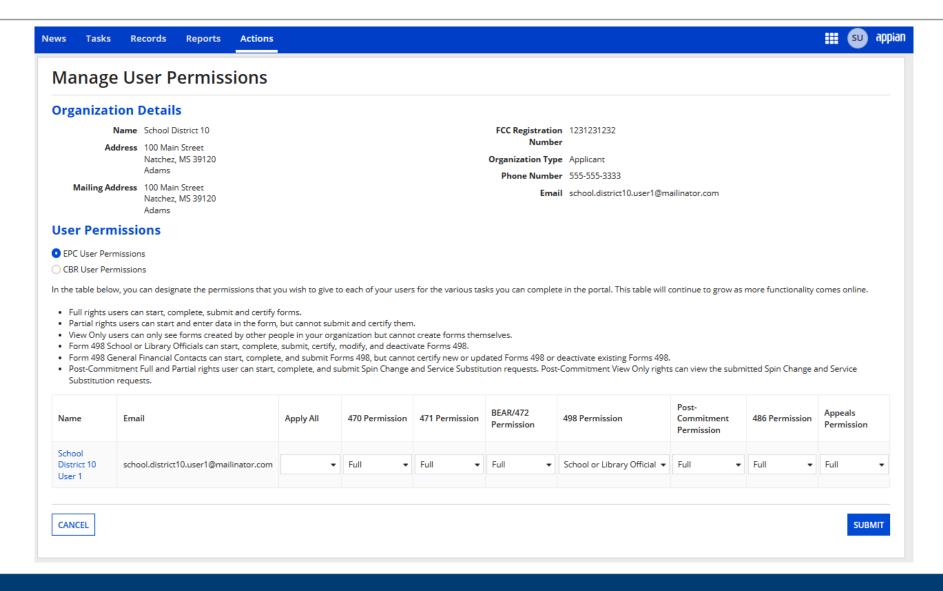


### **EPC Account Administrator**

- Account Administrators can:
  - Create new users
  - Modify the rights of existing users
  - Modify information about their organization
  - Link or unlink their organization to consulting firms
  - Modify (change) the Account Administrator
  - Deactivate users who no longer work for the organization.



### **EPC – User Permissions**





## **District Discount**

INCOME  Measured by % of students eligible for the National School Lunch Program (NSLP)	CATEGORY ONE (C1)		CATEGORY TWO (C2)	
	URBAN Discount	RURAL Discount	<b>URBAN</b> Discount	RURAL Discount
Less than 1%	20%	25%	20%	25%
1% to 19%	40%	50%	40%	50%
20% to 34%	50%	60%	50%	60%
35% to 49%	60%	70%	60%	70%
50% to 74%	80%	80%	80%	80%
75% to 100%	90%	90%	85%	85%



### **Updating Entity / Student**

- Update School names / addresses / type
- Update student counts
  - Full time student count
  - Free/reduced lunch (NSLP)
  - CEP base year
- Category 2 budget student count



#### **FY2026 CEP**

- The minimum allowable Community Eligibility Provision (CEP) % changed from 40% to 25% starting in FY 2024.
- Applicants are no longer required to submit a Receipt Acknowledgement Request (RAL) for CEP % between 25-39%.
- Applicants can now update the CEP % in their EPC entity profile for 25%+.
- Reminder: Check the base year to ensure it is updated to the start of your CEP cycle.
  - If base year is 2021 or 2022, a new/updated base year needs to be entered!



# Eligible Services & Categories

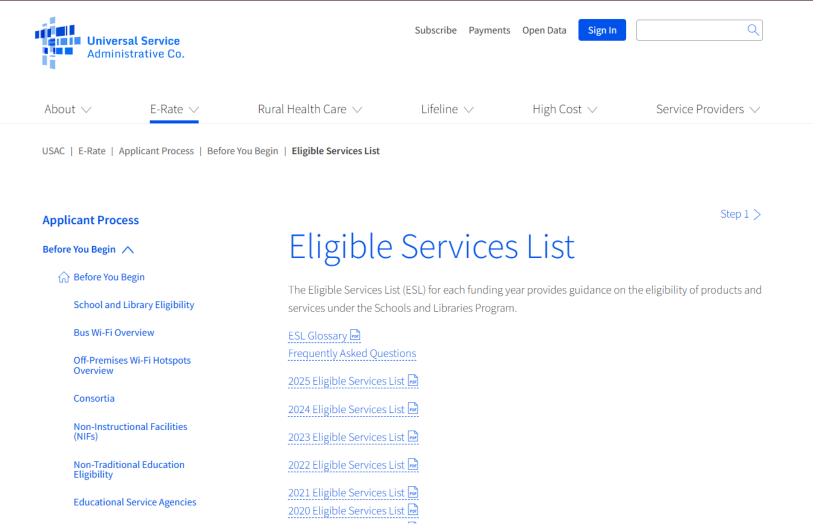


## **Eligible Services List**

- Each year, the FCC issues a list of services that are eligible for the upcoming funding year.
- Category One includes services from the service provider to the schools and/or libraries (demarcation point).
  - Data Transmission and/or Internet Access
- Category Two includes services and equipment needed for broadband connectivity within schools and libraries.
  - Three service types
    - Internal Connections
    - Basic Maintenance of Internal Connections (BMIC)
    - Managed Internal Broadband Services (MIBS)



# Eligible Services List (ESL)





### Category 1 & 2

- Category 1
  - Services needed to support broadband connectivity to eligible schools and/or libraries
- Category 2
  - Services needed for broadband connectivity within schools and/or libraries
  - Services needed to bring broadband into and provide it throughout schools and libraries.
- Equipment and services may be fully or only partially eligible for E-Rate Support.



## Categories of Service

- Category 1 (C1)
  - Data Transmission and/or Internet Access
- Category 2 (C2)
  - Internal Connections, Managed
     Internal Broadband Services, and Basic
     Maintenance of Internal Connections
  - Applicant has a budget or limit on how much funding can be requested
  - Budget covers a five-year period (FY2026 – 2030)



## **Category 1 Services**

- Leased lit fiber or leased lit dark fiber
- Internet access
- Satellite service
- T-1,T-3, etc.
- DSL
- Broadband over power lines



## Category 1 Services Eligible Costs

- Monthly charges
- Special construction
- Installation and activation charges
- Software
- Modulating electronics/equipment necessary to make an eligible Category 1 broadband service functional
- Maintenance and operation charges, including costs for software needed in the operation of or maintenance of network equipment



## **Category 2 Services**

- Services or equipment that go inside the school or library
  - Subcategories:
    - Internal Connections (IC)
    - Basic Maintenance of Internal Connections (BMIC)
    - Managed Internal Broadband Services (MIBS)
  - Maximum discount 85%
  - 5-year budget cycle (Based on number of students multiplied by \$201.57)
  - Equipment received from April 1 of start year through September 30 of end year (15 months)
  - Can apply for 1 year extension if needed (Request must be made by September 30)



### **Basic Maintenance of Internal Connections**

- Basic Maintenance of Internal Connections is the repair and upkeep of eligible internal connections.
  - The two types of Basic Maintenance Internal Connections are:
    - In-Person Services, which include on-site repairs (Time and Material Contracts)
    - Remote Services, which include Maintenance Support Services (such as, basic technical support, configuration changes, bug fixes, patches, software upgrades, support service subscription licenses, technical support licenses)
  - The equipment being maintained must be eligible in order for the maintenance to be eligible for E-Rate support. If repair or replacement work is performed under a maintenance contract, USAC only reimburses for the actual work performed.



### **BMIC Examples: Included**

- Repair and upkeep of eligible hardware
- Wire and cable maintenance
- Configuration Changes
- Basic technical support including online and telephone-base technical support
- Software upgrades and patches including bug fixes and security patches
- Licenses that provide maintenance functionality
- Any license that provides **maintenance functionality** should be requested under **BMIC** on the FCC Form 470/471 (not client access or right to use licenses).



# **BMIC Examples: Excluded**

- Actual equipment
  - These are eligible under Internal Connections
- Unbundled warranties
- Network management services, including 24-hour network monitoring
  - These are eligible under MIBS
- Management, operation and monitoring on eligible broadband internal connections
  - These are eligible under MIBS
- Maintenance on ineligible equipment
- Internal connections software (including Right to Use and Client Access Licenses to make equipment functional): Internal connections software allows the equipment to function and distribute high-speed broadband. They do **not** provide support or maintenance and are therefore ineligible as BMIC. Such software is eligible as **Internal Connections**.



### **Mixed Functionality**

- Some equipment has mixed BMIC & Internal Connections functionality
  - Some vendor licenses may include both BMIC & IC functionality such as Right-to-use and maintenance services on the same license
  - Split the license based on functionality in separate FRNs BMIC & IC
  - Contact the manufacturer or USAC's Customer Service Center (CSC) to obtain the breakdown for specific functionality that is included in a specific mixed services license
- During competitive biding process make sure the Form 470 has both BMIC and IC listed
- Applicant may need to contact USAC if classification is wrong on Form 471
  - RAL before FCDL
  - Service Substitution after FCDL



### Changing Service Types after Submitting Form 471

- All services must be properly bid during the FCC Form 470 process.
- Be sure to confirm that you are posting for all service categories for which you are requesting bid responses on the FCC Form 470.
- FCC Forms 470 with the correct service type are required for corrections to be made on the FCC Form 471.
- To request changes identified after the FCC Form 471 is certified and before the FCDL is issued:
  - Submit a Receipt Acknowledgement Letter (RAL)modification request
- To request changes identified **after** the FCDL is issued:
  - Submit a Service Substitution request with a detailed narrative
    - Background information
    - Calculation for changes (single vs. multi-year)
    - Reason for the correction



### Multi-Year Maintenance Support Servies

- These are preventive and remedial services that physically repair or optimize hardware, including maintenance under contract and per-incident repair
- Services are only eligible for one funding year at a time.
- You must apply for funding for each year separately.
  - Example: A 3-year maintenance contact for \$12,000 can be submitted for reimbursement for each funding year associated for a maximum of \$4,000 per funding year.
  - Prorate the cost of the service for one year and only invoice after the services are received for the applicable funding year.
  - If services extend outside the funding year window, the invoice will be modified to only pay the current funding year services.
  - Inform the reviewer which year of the multi-year contract you are invoicing for.
    - Example: 3-year maintenance contract for **FY2024–2027**. When submitting your request for your 2nd year, indicate that fact to the reviewer.



### Category 1 & 2 Budget

- Category One (C1) services are not limited in cost as long as they are cost- effective (except as noted below).
  - The recently-adopted Wi-Fi Hotspot Order adopts a budget and funding caps for Wi-Fi hotspots and services.
  - Delivered between July 1, 2026 June 30, 2027
- Category Two (C2) services are limited by a pre-discount cost ceiling (the "Category Two budget")
  - Budget period is five years
  - Budget is calculated based on:
    - Schools: Number of full-time students in the school
  - Delivered between July 1, 2026 September 30, 2027
    - Can be extended for up to 1 year



## Category 2 Budget

- C2 budgets changed to a fixed, five-year cycle.
- C2 multipliers and funding floor are set once at the beginning of the cycle.
- They apply to the entire cycle.
- They will be announced in advance of the cycle, adjusted for inflation once, before the cycle starts, and rounded to two digits (dollars and cents).
- For the FY2026-FY2030 cycle:
  - The school multiplier is \$201.57 per student.
  - The minimum funding floor is \$30,175.00.
  - Special funding for 10 schools or less.
- C2 budgets are pre-discount
- NIFs are not eligible



### **Advanced Installation**

- Some Category One non-recurring equipment can be installed as early as January 1, prior to the July 1 start of the funding year, if certain conditions are met.
- Category Two non-recurring services can be installed beginning April 1 before the start of the funding year.





### Advanced Installation – Cat 1

- Advanced installation for non-recurring Category One equipment and services can occur provided the following conditions are met:
- The construction begins after selection of the service provider
- The service provider must be selected pursuant to an FCC Form 470 posting
- A Category One recurring service must depend on the installation of the infrastructure
- The Category One recurring service's actual start date is on or after July 1 of the funding year.



### **Advanced Installation - Cat 2**

- Advanced installation of non-recurring Category Two equipment and services:
- Services cannot start until after the **28-day competitive bidding process** is completed and the service provider is selected.
- Funding is not guaranteed until USAC issues a Funding Commitment Decision Letter.

#### \*\* Reminder

- Funding is not guaranteed until USAC issue a Funding Commitment Decision Letter (FCDL)
- Invoices Form 472 and Form 474 cannot be dated before July 1 of the funding year



# Fiber Types

#### 1. Leased lit fiber

The applicant pays a monthly fee to the service provider who provides the fiber, the connections, the network equipment, and the data transport and/or internet access service. The service provider also manages and maintains the network.

#### 2. Leased dark fiber

The applicant leases a portion of a fiber network owned by a service provider and pays separately for the network equipment, maintenance and operations, and data transport and/or internet access service over that fiber.

### 3. Self-provisioned network

Applicant ownership of a high-speed broadband network. The applicant hires a vendor to construct the network or a portion of the network, and thereafter completely or partially owns and maintains that network or portion. An E-Rate eligible entity may share the services and equipment used to construct and/or operate a self-provisioned network supported by E-Rate funding with an ineligible third-party entity so long as the ineligible third-party entity pays its fair share of the costs, i.e., its prorata portion of the undiscounted costs of the network.



# Fiber Types

### 3. Self-provisioned network cont.

- Self-provisioned networks are a technology-neutral eligible service. Applicants may self-provision a fiber network, but applicants may also self-provision networks using other technologies (i.e., fixed microwave) or a mix of fiber and other technologies. In light of this, the FCC adopted a technology-neutral competitive bidding standard for self-provisioned networks service provided over third-party networks.
- If an applicant specifies a requested bandwidth that other providers can supply, the technology-neutral competitive bidding standard expands the competitive bidding pool and helps to ensure that applicants requesting E-Rate support for self-provisioned networks only do so when it is the most cost-effective service option to meet their connectivity needs. It is possible that based on the applicant's bandwidth specifications that fiber may be the only option for receiving the requested bandwidth.



# **Questions**

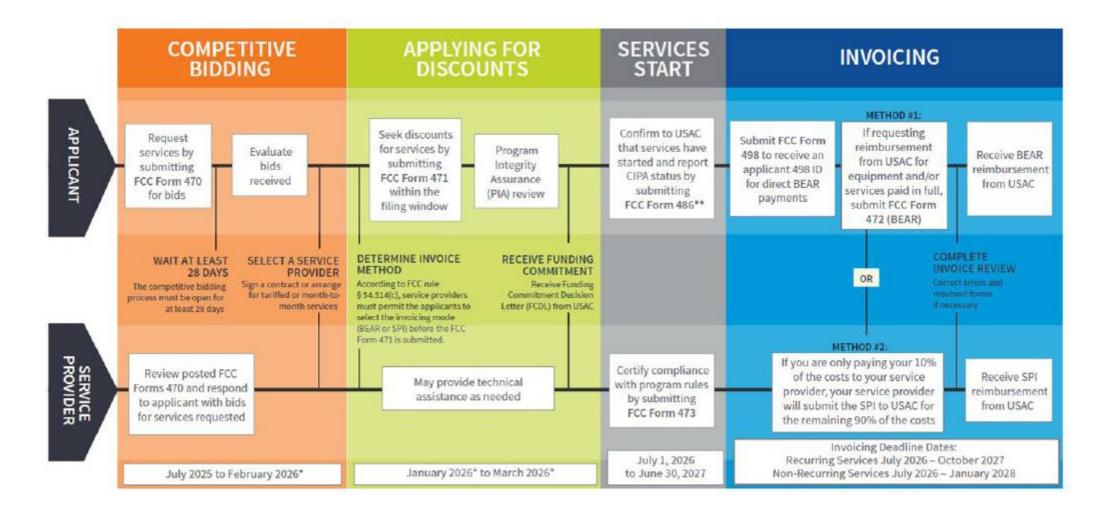




# **Application Process**



# **E-Rate Application Process**





# **Application Process Overview**

E-Rate Step	Suggested Timeline		
1. Assess Needs / Create Plan	August – November		
2. Update EPC Profiles – Admin Window	October – January (closes 3 days prior to Form 471)		
3. Bid all new services / equipment (Form 470)	July – December		
4. Bid evaluation (after 28-day Form 470 waiting period)	August - February		
5. Board Approval / Sign Contracts	September – February		
6. Request E-Rate funding – Form 471	January – March (TBD by USAC)		
7. Application review (PIA)	April – August		
8. Funding Commitment – FCDL	April – August		
9. Turn on funding / CIPA Compliance – Form 486	FCDL Receipt or service start date		
10. Receive services	July (start year) – June (end year)		
11. Pay vendor	July (start year) – June (end year)		
12. Submit invoice to USAC (Payment) applicant - BEAR /Vendor - Form 474	Anytime after start of service – must be filed by October 28 of end year without extension request.		



### **Applicant Forms and Important Dates Reminder**

### Competitive Bidding Apply for Discounts





### **Start Services**

### Invoice USAC

**Recurring Services** 

**FY2024**: July 2024 – October 2025

FY2025: July 2025 - October 2026 FY2026: July 2026 - October 2027

**Non-recurring Services** 

**FY2024**: July 2024 – January 2026

**FY2025**: July 2025 – January 2027

FY2026: July 2026 - January 2028

#### FY2024:

July 2023 - February 28, 2024

#### FY2025:

July 2024 - February 26, 2025

#### FY2026:

July 2025 - February 2026\*

#### FY2024:

January 17, 2024 - March 27, 2024

#### FY2025:

January 15, 2025 - March 26, 2025

#### FY2026:

January 2026 - March 2026\*

#### FY2024:

#### FY2025:

July 1, 2025 - June 30, 2026

July 1, 2024 - June 30, 2025

#### FY2026:

July 1, 2026 - June 30, 2027

472

(BEAR)

OR

474

(SPI)



486

\* Date ranges shown reflect a typical timeline but are subject to change.\*



### **Competitive Bidding Steps**

Get Ready to Request Bids File an FCC Form 470 Ensure an Open and Fair Process

Wait At Least 28 Days Select a Service Provider



# THE COMPETITIVE BIDDING PROCESS

allows applicants to identify and request products and/or services so that potential service providers can review those requests and submit bids for them.

#### The process consists of five steps:

- Get Ready to File
  - · Perform a needs assessment
  - Review your state and local procurement rules
  - · Review the Eligible Services List
- Tile and certify an FCC Form 470
  - Provide sufficient information for potential vendors to provide a comprehensive bid (e.g., for managed internal broadband services specify the exact equipment/services to be managed)
  - Potential bidders (service providers) cannot help you file FCC Form 470
  - You have the option to submit a Request for Proposals (RFP) with your form
  - There are <u>competitive bidding exemptions</u> for certain Category 1 and Category 2 (libraries only) equipment/services
  - After you certify your FCC Form 470, USAC issues a Receipt Notification Letter (RNL) with your Allowable Contract Date (ACD) – the earliest date you can enter into an agreement or sign a contract
- Ensure an open and fair process
- Provide any FCC Form 470, RFP and other information/updates in EPC for all potential bidders for at least 28 days
- "Open" means there are no secrets in the process and that all bidders know what is required of them
- "Fair" means that all bidders are treated the same and that no bidder has project information others do not
- Abide by the <u>Gift Rules</u>

- Wait at least 28 days before selecting a service provider
  - The ACD (included on your RNL) is 28 days after the FCC Form 470 is certified
  - The day you certify the FCC Form 470 is day 1
     If the FCC Form 470 is certified on the 1st of the month, you may select a service provider
     on or after the 29th of the month
    - If you later change the information needed to respond to the bid, you must restart the 28 days
    - If you issue an RFP on a later date, you must restart the 28 days
  - \* State or Local procurement rules may require a longer waiting period
- Select a service provider
- Select a service provider after your ACD and before certifying the FCC Form 471
  - Consider all responsive bids
    - Use a Bid Evaluation Matrix
    - Ensure price is the primary evaluation factor (highest weighted factor). Only the costs of eligible goods/services should be evaluated in this criterion
  - Enter into a legally binding agreement and document selection date (after the minimum 28-day waiting period)
  - Upload your legally binding agreements and contracts to EPC





Retain all competitive bidding documentation, including the Bid Evaluation Matrix, for ten years after the last day you receive services or the end of that funding year, using whichever date is later.





# **Applicant Role**

- Determine services needed, file FCC Form 470 and RFP
- Run competitive bidding process
- Select winning bidder, with price of eligible products and services as primary factor
- Respond to PIA
- File other applicant forms (FCC Forms 471, 486, 472, 500, etc.)
- Document compliance with FCC rules on an ongoing basis
- Retain documentation for at least ten years from last date of service delivery
- Form 470 can be cancelled by Account Administrator (New)



### What are my needs?

- Check with your schools to identify their needs
  - More Bandwidth?
  - Expanded Wi-Fi?
  - Access Points?
- Check with your Budget Officer to see what your Technology Budget looks like
  - Don't ever try to go where your budget can't take you
- Check your C2 Budget Tool to see if you have enough to purchase C2 services
- Check with your Superintendent to see what your districts goals are in relation to what your students or library patrons actually need
  - Don't ever try to go where the Superintendent does not want to go



# Posting the Form 470



- Competitive Process
- Competitive Bidding
- Request for Proposal (RFP)
- Recurring vs Non-Recurring
- State Procurement Rules
- Reverse Auction
- Contracts



### When to file Form 470?

- Must be posted in EPC at least 29 days prior to the close of the Form 471 window
  - Example:
    - Form 471 window deadline is March 25
    - February 24 is Form 470 deadline
      - Do not wait this long!!!
      - Always give yourself several days to evaluate bids, negotiate contracts, seek board approval, sign contracts, upload contract, etc.
      - All items listed above must be completed prior to filing Form 471
    - Always give yourself enough time just in case something goes wrong



### **Competitive Process**

- 1. Get ready to file
- 2. File & certify Form 470
- 3. Ensure an open & fair process
- 4. Wait at least 28 days before selecting service provider
- 5. Select service provider



### **Competitive Bidding**

- Run an open and fair competitive bidding process.
  - **Open** = information shared with one bidder must be shared with all.
  - Fair = bidders must be evaluated fairly and equally.
- Wait 28 days before choosing a service provider.
  - FCC Form 470 must be posted on the USAC website for a minimum of 28 days before you select a vendor and file an FCC Form 471.
- Evaluate bids using the price of the eligible services as the primary factor.



### **Request For Proposal**

- Requests for Proposal (RFPs) may be created to describe specific needs and circumstances in more detail.
- USAC refers to an RFP or an RFP document generically.
  - RFP documents are any documents that provide additional information to potential bidders on the scope or details of your project.
  - For most types of service requests, RFPs are not required. However, you must issue an RFP for some requests or if you are required to do so by state/local rules.
  - Services on your FCC Form 470 and RFP must match.
  - All RFPs and RFP documents must be attached to your FCC Form 470 in EPC.
- When unsure about what type of service to request bids for, request bids on both
  - i.e. Internal connections or Basic Maintenance of Internal Connections



## Requests for Proposal (RFP)

- RFP not required, except for:
  - State bidding requirements
  - All dark fiber or self provisioned fiber projects
- USAC considers any bidding documents provided to a vendor an RFP
- If using an RFP
  - All documents must be uploaded in EPC at time of Form 470 posting
  - Cannot cite to a website bidding advertisement
  - Any changes must be given to all vendors after application is submitted
    - Changes must be added to Form 470
    - 28-day clock will restart



### **Common Bidding Errors**

- Provide sufficient information for potential bidders to provide a comprehensive bid (e.g., for managed internal broadband services specify the exact equipment/services to be managed).Include all information needed on the FCC Form 470/RFP for potential vendors to provide a comprehensive bid.
- Ensure **price** is the primary evaluation factor (highest weighted factor). Only the costs of *eligible* equipment/services should be evaluated in this criterion.
- Potential bidders (i.e., service providers) cannot help you complete or file the FCC Form 470.
- Retain all necessary competitive bidding documentation for ten (10) years after the last day you
  receive services or the end of that funding year, whichever date is later.
- Ensure that all equipment/services you request on the FCC Form 471 is listed on the FCC Form 470/RFP (including all bandwidth speeds).
  - Specifically for Internet Access/Data Transmission Services, applicants should ensure that speeds of services requested on the FCC Form 471 are reflected on the FCC Form 470/RFP.
- Select a service provider after your allowable contract date and before certifying the FCC Form 471.



# Mixed Eligibility- Products & Services

- **Mixed eligibility** refers to equipment and services for which only a portion is eligible for discounts under the E-Rate program.
- In general, a cost allocation, separating the eligible and ineligible costs, is required if an equip mentor service:
  - Contains both eligible and ineligible components for example, a data T1 circuit (eligible) that also has channels on the circuit dedicated to voice services (ineligible);
  - Is utilized for eligible and ineligible uses for example, a server that is used for both caching (eligible) and video distribution (ineligible); or
  - Is delivered to both eligible and ineligible locations— for example, broadband service delivered to a school run by a church (eligible) and to the church office (ineligible).
- There is no single approved method to allocate eligible and ineligible costs. Your method must use tangible criteria that result in a reasonable allocation.



# **Evaluating Bids**

- After bid due date (at least 29 days) applicant reviews all qualified submissions
- Must have and retain a bid matrix
- Price of eligible services/equipment must be the most heavily weighted factor during evaluation
  - Sample criteria
    - Quality of proposed solution
    - Cost of ineligible items
    - References
    - Experience with vendor
    - Ability to meet installation deadline
- Retain all winning and losing bids and all correspondence between applicant and vendors (winning and losing)



### No Bids?

- Document via an email or file memo that no bids were received
- Existing services: can continue to receive services from existing service provider
- New Services/Procurement: Solicit bid from willing vendor
  - Make sure price is cost effective
  - Check marketplace options from other vendors in your area or nearby areas
  - Save research and information to justify buying service for this vendor



## Receipt Notification Letter (RNL)

- After posting FCC Form 470, USAC issues a Receipt Notification Letter (RNL) in your EPC News feed.
- Review your submitted FCC Form 470 carefully. If you need to make corrections, do the following:
  - For minor changes (see the Ministerial and Clerical Errors page on the E-Rate website), locate the form in EPC, and choose "Related Actions" to submit allowable corrections.
  - For significant changes to your form, you must file a **new** FCC Form 470 or restart your 28-day waiting period.
- The Receipt Notification Letter contains your Allowable Contract Date, which is 28 days after the certification date of your FCC Form 470.



### **Bid Matrix**

- To evaluate incoming bids, create a bid evaluation matrix or similar document.
- Develop evaluation criteria or factors to assess the bids.
  - You can have one or multiple factors.
  - You may also use disqualifying factors.
- Assign each evaluation factor a point value or percentage.
  - Ensure that **price is the primary evaluation factor**. The **cost** of the **eligible equipment and services** must be the **most heavily weighted factor**. Only the costs of *eligible* goods/services should be evaluated in this criterion.
  - Other factors can be considered, but they must be weighted less than the price of eligible equipment and services.



# **Bid Evaluation Matrix - Sample**

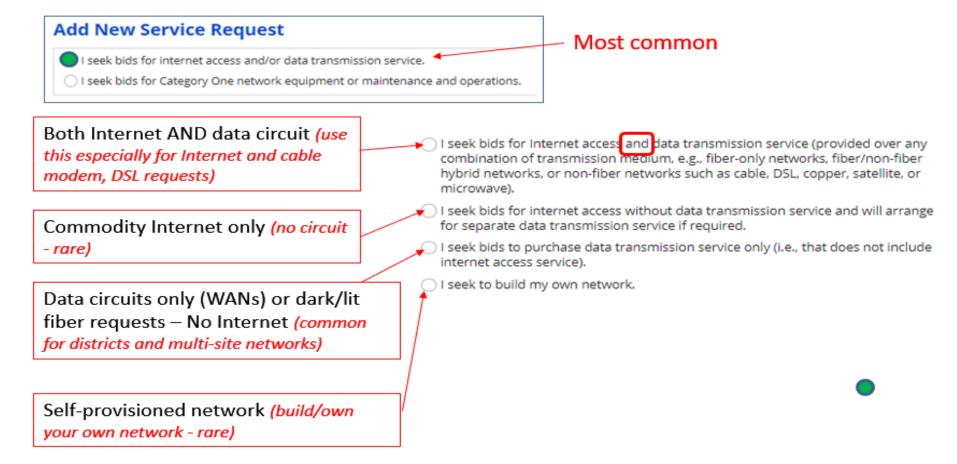
Factor	Points Available	Vendor 1	Vendor 2	Vendor 3
Price of the eligible products and services	50*	20	50	40
Prior experience with the vendor	25	25	0	25
Prices for ineligible services, products, and fees	15	10	5	15
Local or in-state vendor	10	10	0	0
Total	100	65	55	80



<sup>\*</sup>This number must be higher than all other numbers in the same column.

# Form 470 - Example

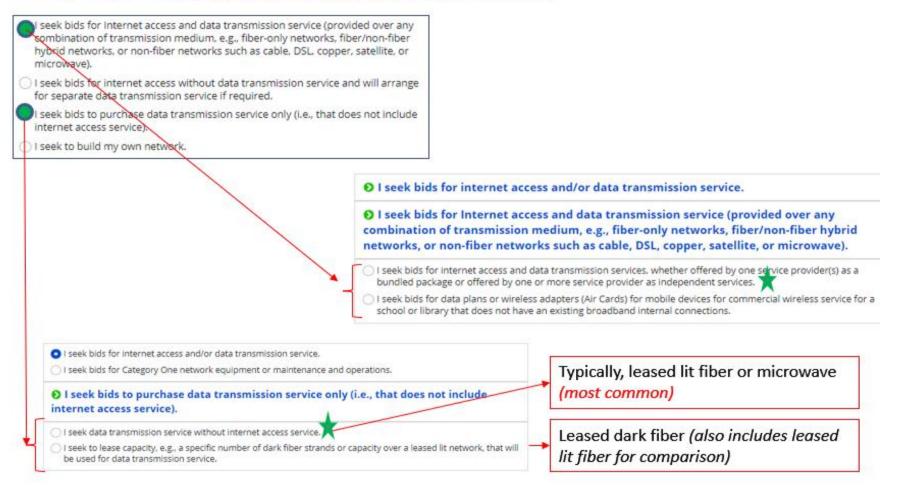
FCC revamped Form 470 in attempt to remove "gotchas"





# Form 470 - Example

1<sup>st</sup> or 3<sup>rd</sup> Options have additional radial options:





# Form 470 - Example

- Welcome changes to C2 Form 470!
  - Basic maintenance an "add on" option to equipment request
  - Licenses/software included with equipment request





### **State Procurement Rules**

\$.01 - \$5,000.00	\$5,000.01 - \$75,000.00	Greater than \$75,000	+ E-rate Requirements
May purchase without advertising or otherwise requesting competitive bids	May purchase without advertisement for bids, provided at least two competitive written bids have been obtained	Advertisement & receipt of competitive bids required by law	Post Form 470 and wait 28 days before awarding

The lifecycle cost of an information technology project means the total committed costs of the project, not just the initial or up-front costs. Lifecycle cost includes all costs associated with obtaining the item and maintaining and operating it for its projected lifecycle. Initial or one-time costs might include purchase price, freight, installation, and training. Ongoing costs include such expenses as post-warranty maintenance; support, including help desk charges, upgrade charges, and on-site vendor personnel; and any recurring usage charges.



### **Reverse Auction / Termed Contracts**

- DFA Contact
  - Ross Campbell / Danny Lynch
  - ross.campbell@dfa.ms.gov
  - danny.lynch@dfa.ms.gov
  - 601-359-2004
- Termed Contract (60 months)
  - No Reverse Auction
  - Set time frame of contract
  - Purchase off contract more than 1 time
- Reverse Auction
  - One time purchase
  - Conducted by district or by 3<sup>rd</sup> party
- Reverse Auction Exemption
  - Submit request to DFA
- Dates: <a href="https://www.dfa.ms.gov/pprb-meetings">https://www.dfa.ms.gov/pprb-meetings</a>



### **Reverse Auction**

- Items to be submitted to DFA
  - Newspaper Ad
  - Agency Bid Bank notification
  - Bid Specs
  - Winning bid
  - Bid Tabulation
  - If not low bid, justification needed



### **Contracts**

- Must be loaded in EPC prior to starting Form 471
- Applicants must have a signed contract or **other legally binding agreement** in place prior to submitting their FCC Forms 471 to USAC.
  - Signed contract with Form 470 winning bidder
  - Vendor can sign after Form 471 deadline
- Applicant must not sign a contract before the Allowable Contract Award Date (ACD).
- Signed contracts constitute the best evidence that a legally binding agreement exists.
- A verbal offer and/or acceptance will not be considered evidence of the existence of a legally binding agreement.
- For additional information about State Master Contracts, see the USAC website.
- Types
  - One year
  - Multi-year
    - Can contain voluntary extensions
- Must be loaded in EPC in PDF format



# **Uploading Contract**

- All new contracts must be uploaded into the EPC Contract Module before starting the Form 471
- Assign a very descriptive nickname
  - Example FY26 CSpire Internet
- Upload copy of contract
- Enter the following information:
  - Form 470 used to bid service
  - Contract signing date
  - Number of bids
  - How many contract extensions, if any
  - Service Provider Identification Number (SPIN)
- Contract expiration date will be added to the Form 471



### **Contract Changes**

- RFP Upload
  - Upload RFP to any non-cancelled Form 470, even is Form 470 did not originally have a RFP
- Substantial Change Question/New Layout to RFP Upload Screen
  - New Yes/No question: Does this new RFP constitute a substantial change to your FCC Form 470
- ACD Automatic Reset
  - When "Yes" is selected for substantial change question, the allowable contract date will automatically update to extend by 28 days.
  - Day of modification/new RFP is day 1, the following day is day 2. ACD on Summary screen will change to reflect new date.
- ACD Automatic Reset Validations
  - ACD cannot be reset if the FCC Form 470 is referenced on an FRN which is not cancelled.
     Error message will appear.
  - FCC Form 471 cannot be certified if an FRN is citing an FCC Form 470 whose ACD is in the future. Error message will appear.
    - If the offending FCC Form 470 is removed from the application, the FCC Form 471 can be certified.

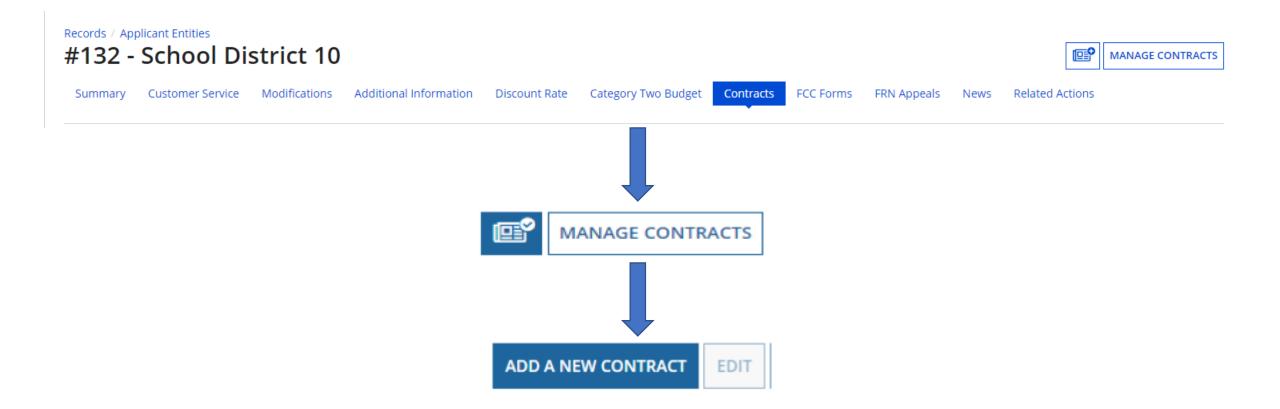


#### **Contracts – Mistakes to Avoid**

- The contract contains the **applicant's signature and date** of when the contract was executed.
- The legally binding agreement contains all the material terms and conditions and contains a written acceptance of the offer.
- The contract/legally binding agreement was negotiated on or after the Allowable Contract Date on the FCC Form 471.
- The contract/legally binding agreement was negotiated/executed on or before the submission of the FCC Form 471.



### **Add New Contract - EPC**





### Contract 5000-1 – C Spire

The primary services included under Category I include:

- Switched Ethernet and MPLS circuits
- Raw Internet
- PRIs
- SIP trunks
- Centrex Platinum
- Business Lines
- Hosted Firewall and Content Filtering
- IP Addresses



### Contract 5000-2 - ATT

The primary services included under Category 2 include:

- ADI Internet Managed or Unmanaged (Same as MIS)
- BVoIP
  - SIP Handoff
  - PRI Handoff



### 28-Day Waiting Period

Applicants must wait at least 28 days after certifying their FCC Form 470 before selecting a service provider, executing any contracts for contracted services, or signing and submitting an FCC Form 471. The allowable contract date (ACD) is the earliest date on which an applicant can select a service provider by entering into a contract. See your Receipt Notification Letter for the specific ACD for your FCC Form 470.

#### Frequently Asked Questions (FAQs) on the 28-daywaiting period:

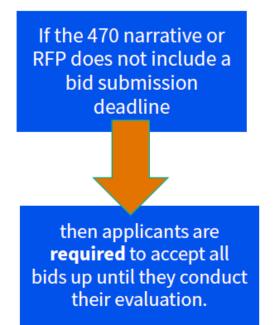
- When does the waiting period start? The day you certify your FCC Form 470 is day1. For example, if you certify the FCC Form 470 on 1/1/2025, you may select a service provider on or after the 29<sup>th</sup> of the month. If you make changes after certifying the FCC Form 470, you may be required to restart the 28-day waiting period.
- Do weekends count as apart of the 28days? Yes, the minimum 28-day period is based on calendar days.
- When can you select a vendor? After the 28-day waiting period (unless your FCC Form 470 lists a later bid deadline.)
- When's the last day you can select a vendor? You must select the most cost-effective service offering before you submit the FCC Form 471.
- When can you stop receiving bids? You may set bid deadline and include it to your narrative or RFP. This deadline must be at least 28 days after certifying your FCC Form 470 or longer depending on state rules. If you do not add a deadline to your narrative or RFP, you must accept bids up until you evaluate bids and make a vendor selection. These deadlines should be memorialized in your records.



#### **Allowable Contract Date**

CALENDAR						
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
29	30	31	Certified 1 FCC Form 470	2	3	4
			Day 1	Day 2	Day 3	Day 4
5	6	7	8	9	10	11
Day 5	Day 6	Day 7	Day 8	Day 9	Day 10	Day 11
12	13	14	15	16	17	18
Day 12	Day 13	Day 14	Day 15	Day 16	Day 17	Day 18
19	20	21	22	23	24	25
Day 19	Day 20	Day 21	Day 22	Day 23	Day 24	Day 25
26	27	28	Allowable 29 Contract Date	30	1	2
Day 26	Day 27	Day 28	Day 29			

#### Remember



<sup>&</sup>lt;sup>1</sup> This may vary based on state and local procurement rules.

•This is the earliest you can select a vendor.¹
•You can wait up until you certify FCC Form 471 to select a vendor.²

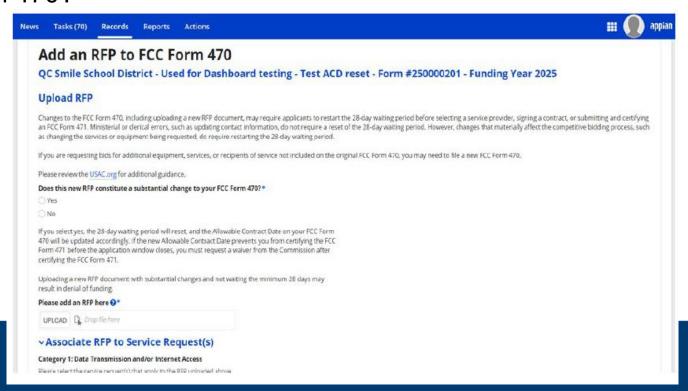
https://www.usac.org/e-rate/applicant-process/competitive-bidding/28-day-waiting-period/



<sup>&</sup>lt;sup>2</sup> You must select a vendor before the filing window closes.

# **Allowable Contract Date Changes**

- RFP Upload
  - Allow users to upload an RFP document to any non-cancelled Form 470, even if that Form 470 did not originally have an RFP.
- Substantial Change Question/New Layout to RFP Upload Screen
  - New Yes/No question: Does this new RFP constitute a substantial change to your FCC Form 470?





## **Allowable Contract Date Changes**

#### ACD Automatic Reset

- When "Yes" is selected for substantial change question, the allowable contract date will automatically update to extend by 28 days.
- Day of modification/new RFP is day ONE. ACD on Summary screen will change to reflect new date.

#### ACD Automatic Reset Validations

- ACD cannot be reset if the FCC Form 470 is referenced on an FRN which is not cancelled.
   Error message will appear.
- Form 471 cannot be certified if an FRN is citing an FCC Form 470 whose ACD is in the future. Error message will appear.
  - If the offending FCC Form 470 is removed from the application, the app can be certified.



# Waiting on Bids

- After applicants file and certify their FCC Form 470, they must wait a minimum of 28 days before selecting a service provider.
- Use the 28-day waiting period to:
  - Receive bids.
  - Respond to service provider inquiries regarding your project.
  - Be sure that any information provided to one service provider is provided to all bidders.
- Evaluate the bids using your factors and bid evaluation matrix.



# Steps after 28-Day Waiting Period

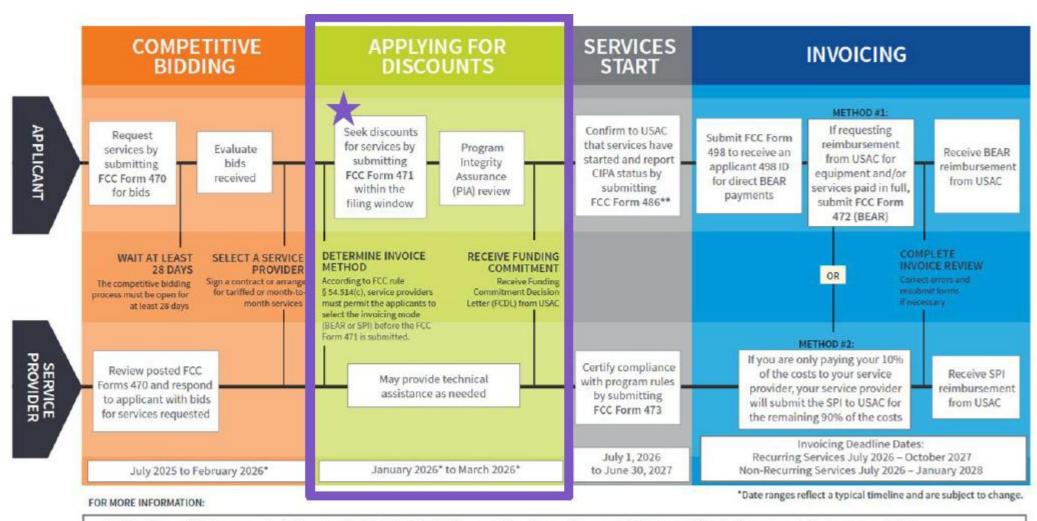




### **Form 471**

471

- Guidelines
- Filing Window Discounts



- . Website: The application process is broken down in detail for both applicants and service providers on the Schools and Libraries Program website (www.usac.org/sl).
- · Glossary of Terms: Definitions for program terms and acronyms.
- \*\*Consortium members report their CIPA status by submitting the FCC Form 479 to their consortium leader. The consortium leader then files the FCC Form 486.
- To adjust funding commitments and/or modify the dates for receipt of services after the FCDL is issued, file the FCC Form 500.



### **Form 471**

- Provide information about your requests (discount level, costs of services, service providers)
- Applicants must:
  - Include information on the recipients of service and service providers
  - Provide detailed descriptions of services including costs and dates of service and/or the requested equipment
  - Certify compliance with program rules.
- Verify all items on application are:
  - Included in Form 470 and competitively bid
  - 28-day rule complied with
  - Listed in the Eligible Services List
- 90% used by district entity
  - No cost allocation



# Form 471 – Filing Window

- Filing Window generally opens mid-January and closes mid-March
- FY2026 will close in mid-March.
- The filing window generally opens in mid-January and closes in mid-March in advance of the start of the funding year
- \*Applications (FCC Forms 471) filed outside of the filing window are not considered for funding



#### **Common Form 471 Errors**

- Not correctly classifying the category of service or equipment/service type on the Form 470
- Filing inaccurate Funding Request Number (FRN) with the wrong equipment or service type
- Failing to remove ineligible services and equipment



### **Eligible Software Category**

- Software can fall into two service types
- Commitments for different types of software can be for different term lengths.
  - Right to Use Licenses Purchased with Internal Connections **All years** of the license contract can be billed in a single funding year.
    - For a 3-year contract for 100% eligible licenses at a pre-discounted amount of \$12,000, the full amount of \$12,000 could be entered into a single funding request number (FRN) for that funding year.
  - Software updates are considered basic maintenance of internal connections (BMIC) Only the **current year** of service can be included in a single funding year, and multi-year software contract amounts must be prorated.
    - For a 3-year contract for 100% eligible BMIC services at a total pre-discounted amount of \$12,000, the FRN could only reflect a single year of expenses, or \$4,000, in a **single funding year**. BMIC services can only be invoiced after they are actually provided/performed.



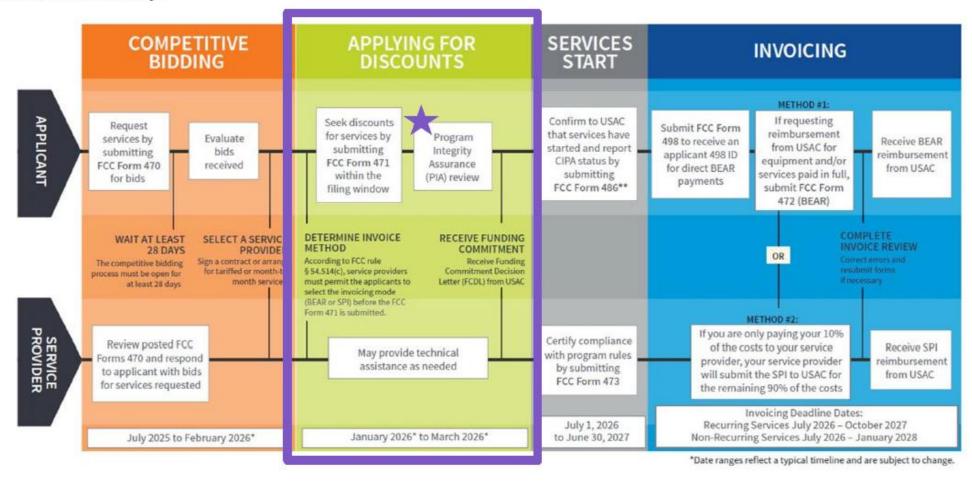
### Relationship between Unique Numbers

	Choose Category 1 or 2	C1 or C2 are filed on separate FCC Form 471s
	Application Number FCC Form 471	Each FCC Form 471 is assigned a unique number
	Funding Request Number (FRN)  Each FCC Form 471 can have one or multiple FRNs	Each FRN must have <b>all</b> of the following information in common: Billed entity number (BEN), contact information, category of service (C1 or C2), service type (data transmission and/or internet access, internal connections, BMIC, managed internal broadband services), FCC Form 470, service provider (SPIN), purchase type (contract, month-to-month, tariff), contract ID (if you have one), service start and end dates.
	FRN Line Item	Each FRN Line Item must have <b>all</b> of the following information in common: Equipment or service, rates and quantities, and recipients of service (ROS). Each may have unique or overlapping ROS. Duplicative or redundant services are ineligible.



### **Program Integrity Assurance Review (PIA)**

After applicants certify an FCC Form 471 within the filing window, PIA reviewers check the information on the form for completeness and accuracy.





### **Before PIA Review**

- After certifying your FCC Form 471, and while you are waiting for your program integrity assurance review, there are some areas you should double-check for accuracy.
- If you find any information that should be corrected or updated, you can submit a Receipt Acknowledgment Letter (RAL) Modification Request.
- If you are using a new or existing contract on your FCC Form 471, you must have a contract **record** uploaded to your EPC profile
  - To create that record, go to your organization page and click Contracts, then Manage Contracts and Add a New Contract.



### **Funding Commitment Decision Letter**

- After the program integrity assurance review process has been completed, USAC issues a Funding Commitment Decision Letter (FCDL) containing USAC's decisions on your funding requests.
- You can find this decision in the Newsfeed in your organization's EPC account.
- You should review this decision carefully, as it contains important information both for planning to start services and for completing the additional steps in the application process.
- If you disagree with one or more of the decisions in your FCDL, you can appeal to USAC.



### **Form 486**

486

- Guidelines
- Start Date
- Filing Form 486



### Form 486 - Continued

- Applicants file the FCC Form 486 to:
  - Notify USAC that **services have started** for the Funding Request Numbers (FRNs) listed on the FCC Form 471.
  - Report the status of compliance of the entities on those FRNs with the Children's Internet Protection Act (CIPA).



### Form 486 Service Start Date

- What is my Service Start Date (SSD)?
  - The first day of the funding year if services start on or before July 1..
  - Any day after July 1, but before June 30 of the funding year that services were actually started.
- For installations that started on May 25 before the funding year, the SSD is July 1 of the funding year.
- For services starting August 7 of the funding year, the SSD is August 7 of the funding year.
- The FCC Form 486 MUST be certified no later than 120 days after the Service Start Date reported on the FCC Form 486 or 120 days after the date of the Funding Commitment Decision Letter (FCDL), whichever is later.





#### FCC Form 486 Notification Letter

Lee Bray
MISSISSIPPI DEPARTMENT OF EDUCATION
359 NORTH WEST STREET SUITE 118
JACKSON, MS 39201

**FUNDING YEAR 2022:** 7/1/2022 - 6/30/2023

FCC Form 486 Application Number: 279840

Applicant's FCC Form 486 Nickname: CSpire Circuits FY22

This letter is to notify you that the Universal Service Administrative Company (USAC) has received and accepted a certified FCC Form 486, Receipt of Service Confirmation Form, from you. Information about your commitment may have changed. Please review the <a href="FCC Form 486">FCC Form 486</a> Notification Letter Report to confirm the information you provided. This information is also being shared with the service provider(s) identified on each Funding Request Number (FRN).

7/11/2022

If you need assistance, contact our Client Service Bureau toll-free at (888) 203-8100, or submit a customer service case in the E-rate Productivity Center (EPC) by selecting "Contact Us" from the menu in the top right corner of your landing page.

#### Next steps

Discuss with your service provider whether you would like discounts on your bills or to pay your bills in full and be reimbursed for discounts.

 Applicants invoice USAC before the invoice deadline using the applicant invoice method [FCC Form 472, Billed Entity Applicant Reimbursement (BEAR) Form] for reimbursements of discounts after paying the service provider bills in full.



### **Child Internet Protection Act - CIPA**

- Guideline
- Internet Safety Policy
- Technology Protection Measure (Filter)
- Public Notice and Hearing or Meeting
- Documentation



### **CIPA**

- Requires that schools and libraries enforce certain safety measures that protect against access by adults and minors to obscene content on the internet.
- Three requirements include:
  - Internet Safety Policy
  - Technology Protection Measure
  - Public Notice and Hearing or Meeting
- The school or library must maintain documentation demonstrating that they are working toward compliance (in the first year) or in compliance (second year and thereafter).

### **CIPA** – Internet Safety Policy

#### The Internet Safety Policy (ISP) must address:

- Access by minors to inappropriate matter on the internet and World Wide Web
- The 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, and dissemination of personal information regarding minors; and Measures designed to restrict minors' access to materials harmful to minors.

#### Additional requirements for schools:

- Must also include monitoring the online activities of minors.
- Must 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.



# CIPA – Technology Protection Filter

- A technology protection measure is a specific technology that blocks or filters internet access.
  - Entities must enforce the operation of the technology protection measure during the use of its computers with internet access.
  - A person authorized by the authority with responsibility for administration of the school or library may disable the technology protection measure during use by an adult to enable access for bona fide research or other lawful purpose.
- Decisions about what matter is inappropriate for minors are made by the local community (school board, local educational agency, library, or other authority).



## CIPA – Public Notice & Hearing / Meeting

- You must provide public notice and hold at least one public hearing or meeting to address the internet safety policy.
- For private schools, public notice means notice to your constituent group.
- Additional meetings are not necessary— even if the policy is amended — unless those meetings are required by state or local rules or the policy itself.
- Document meeting

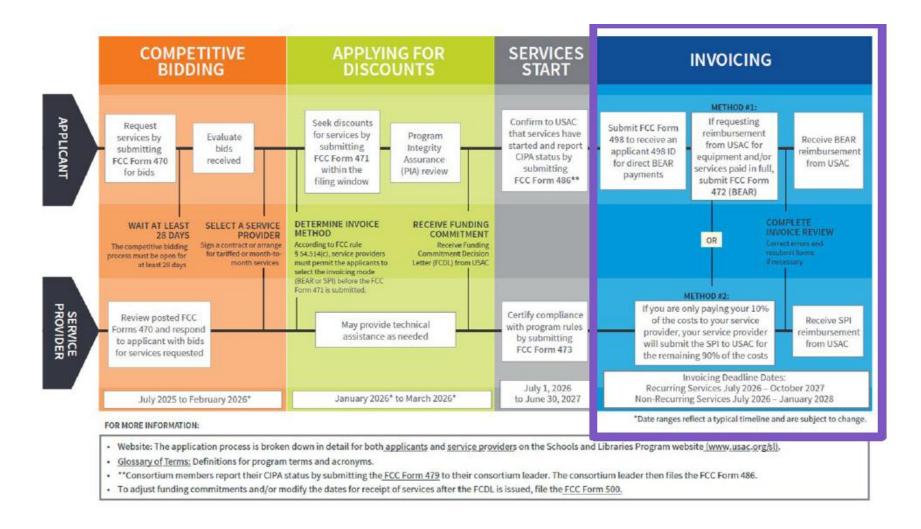


### **Equipment Transfer and Labeling**

- Label equipment and record asset with purchase year
  - Make/model/serial #/building/room/FRN/date installed
  - Update list when equipment is moved
  - Asset inventory kept for 10 years from date of purchase
- Equipment transfer
  - Between eligible schools for first 5 years
  - Do not have to notify USAC
  - Update internal inventory list when move occurs
  - After 5 years, items can be disposed of, sold, transferred, etc. or moved to a NIF.



### Invoicing





### **Form 498**



- List all banking process information
- Is it up to date?
  - Current Bank Account
  - Current Bank Routing Number
- Have you checked it lately??
- Will require Sam.gov UEI if changes are made
- https://www.usac.org/e-rate/applicantprocess/invoicing/obtain-an-applicant-498-id/



### **Form 500**

500

- Adjusting Approved Funding
- When to file
- https://www.usac.org/e-rate/applicant-process/before-youredone/fcc-form-500-filing/



## Form 500 – Adjusting Approved Funding

- Requests specific changes to your funding commitments after USAC issues your FCDL, such as:
  - Extending the contract expiration date listed on FCC Form 471.
  - Changing the service start date listed on FCC Form 486.
  - Cancellation or reduction of a Funding Request Number (FRN).
  - Requesting an extension of the deadline for delivery of non-recurring services.
- FCC Form 500 for Category Two funding reductions
  - If you do not use all of the Category Two funding commitment, you can submit FCC Form 500 to return funds committed but not invoiced to your five-year Category Two budget.
- FCC Form 500 for FY2016 and forward:
  - File and certify in EPC.
- NOTE: If you do not use all of a Category Two funding commitment, file an FCC Form 500 to return committed funds and attach a spreadsheet with a detailed allocation for all of your affected entities.



#### **Form 472 - BEAR**



- Applicant Reimbursement
- Filed in EPC
- Filed at applicant determined intervals
- https://www.usac.org/e-rate/applicantprocess/invoicing/fcc-form-472-filing/

#### **BEAR / SAM.GOV**

- EPC E-Rate Invoice
- Waffle Icon EPC Invoice
- Sam.gov
  - Renewed annually
  - UEI will be required in EPC
  - Replacing DUNS

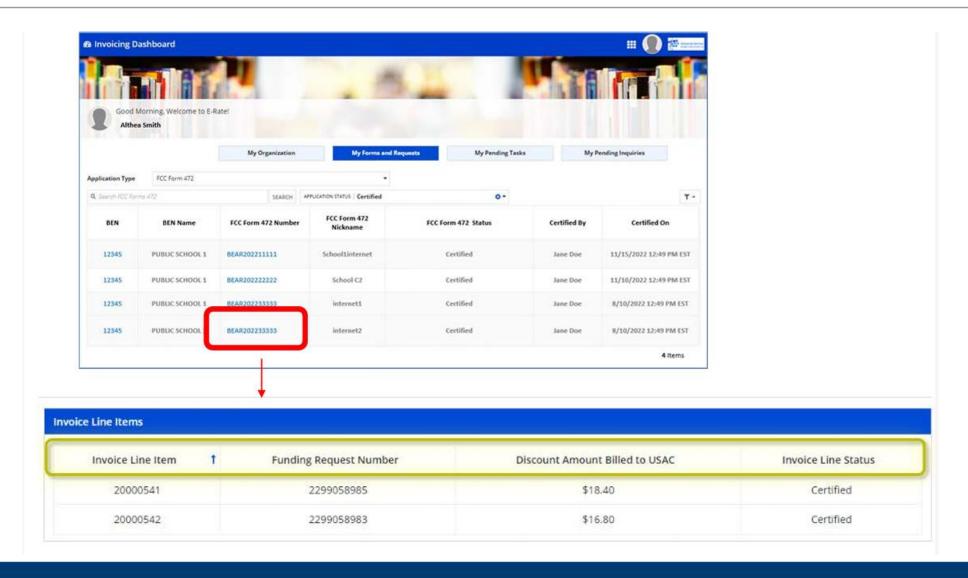


#### **BEAR Permissions**

- No USAC request needed
- BEAR permission located on User Permission page
- If user already had BEAR permission credentials should have moved into EPC access
- If not, AA will have to add BEAR permission



### **Invoicing Dashboard**





### **Audit & Assurance Division Overview**

PQA	SCAP	BCAP
Determines improper payment rates for USF programs	Assesses compliance with FCC Rules as it relates to national security threats to the communications supply chain	Assesses compliance with FCC Rules for USF programs
Evaluates the accuracy of data submitted for USF purposes and USAC's internal disbursement processes (a high-level review)	Evaluates whether program participants have used USF funds and federal subsidies to purchase any equipment or services provided or manufactured by Covered Companies.	Evaluates the accuracy of data submitted for USF purposes (a detailed review)
Identifies overpayments that must be recaptured	Identifies, in consultation with the FCC, what corrective action is appropriate	Identifies correct contribution obligations (for contributor audits)/overpayments that must be recaptured (for beneficiary audits)
Prompts other corrective actions to decrease improper payment rates	Initiates other corrective actions to increase compliance	Initiates other corrective actions to increase compliance
	Deters waste, fraud and abuse	

Identifies FCC Rules that may require the attention of USAC or FCC management



#### **E-Rate Audits**

#### 3 Types

#### Pre-Commitment Audit – Selective Review

- Often a competitive bidding review
- Requires all winning/losing bids, vendor correspondence, bid evaluation
- Completed by separate team outside of PIA review
- If you pass SR, then application goes to PIA review

#### PQA Assessment Audit

- Random FRNs selected among disbursements for certain "window"
- Requires nearly all same documentation to be submitted as larger BCAP audit but for a FRN, not all FRNs in a funding year
- ~350 per year
- Used to determine 'Improper Payment Rate' for entire E-Rate program

#### BCAP Audit

Large audit of all FRNs in a funding year



### **Audit / Assessment Duration**

- PQA Assessment 3 months\*
- SCAP Audit 8 months\*
- BCAP Audit 9 months\*

\*Note: The above audit/assessment durations are estimates. The length of an audit/assessment depends on may factors, including the timeliness of providing documentation to AAD, complexity of documentation being reviewed, and audit issues encountered.



#### **Invoice Decision Codes**

- USAC processes the invoice request and issues its invoicing decision.
- When the invoice mode is BEAR, the applicant and the service provider receive a copy of the FCC Form 472 BEAR Notification Letter.
- Service providers will receive a remittance statement after filing a SPI Form.
- Invoice Decision Codes explain the reason for any modifications or denials.
- Invoice information is also available in Open Data.
- For more details on a particular invoice, contact the USAC Customer Service Center.



Available for Public Use

Decision	Plain Language Decision Explanation	Historical Decision Explanation		
Code		(Letters issued before October 1, 2020)		
40	Either a Customer Billed Date or a	Either Billed Date or Shipped Date must be		
	Shipping Date to Customer must be	entered.		
	entered on this invoice line.			
41	Either a Customer Billed Date or a	Both Bill and Ship Date cannot be entered		
	Shipping Date to Customer, but not			
	both, must be entered on this invoice			
	line.			
42	The Total (Undiscounted) Amount was	Total (Undiscounted) Amount for Service pe		
	not provided on the invoice line.	FRN (Not Provided)		
44	The Discount Amount Billed to SLC was	Discount Amount Billed to SLC (Null or Zero)		
	not provided on the invoice line.			
48	The undiscounted amount multiplied	Discount Amt. Billed Not Valid		
	by the discount percentage for this FRN			
	is lower than the requested invoice			
	amount.			
60	The service provider has not certified	Service provider must be certified		
	an FCC Form 473 for the funding year.			
67	The Shipping Date to Customer is after	Ship Date > [%s] days (486) Early Term Dt		
	the Contract Expiration Date or the			
	Service End Date (whichever is earlier).			
68	The Shipping Date to Customer is after	Ship Date> [%s] days 471 Term or Cnt Ext		
	the Contract Expiration Date or the			
	Service End Date (whichever is earlier).			
75	The Customer Billed Date entered on	Billed Date after [%s] fund yr;one time cost		
	the invoice line is outside of the funding			
	year for this FRN.			
76	The Customer Billed Date entered on	Billed Date after [%s] fund yr;mnthly cost		
	the invoice line is outside of the funding			
	year for this FRN.			
77	The Shipping Date to Customer entered	Shipped Date after [%s] fund yr;one time co		
	on the invoice line is outside of the			
	funding year for this FRN.			
78	The Shipping Date to Customer entered	Shipped Date after [%s] fund yr;mnthly cost		
	on the invoice line is outside of the			
	funding year for this FRN.			
80	This invoice was submitted after the	Invoice Received Date is later than Invoice		
	invoicing deadline for the FRN.	Received Extension Date for FRN		
81	The Customer Billed Date entered on	Bill Date [%s] > [%s] Billed Extension Date;		
	the invoice line is after the Invoice	one time cost		
	Deadline Date.			



### **Invoicing Appeals**

- If your timely-filed invoice is rejected or modified, you have two options:•If it is before the IDD, resubmit a corrected invoice.
- If it is after the IDD, you have the right to appeal the decision.
- Appeals must be filed first with USAC.
- You have 60 days to appeal to USAC.
- Appeals filed more than 60 days after the decision date are automatically dismissed, and a waiver must be filed with the FCC.
- If USAC denies the appeal, you have 60 days to appeal that denial to the FCC.
- Waivers of the Commission's rules, such as the invoice deadline rule, can only be sought from the FCC. An appeal of a timely-filed invoice that is rejected or modified does **not** require a waiver of the invoice deadline rule.
- Additional information on the appeals and waivers is available on USAC's website.



#### **Documentation**

- Ensure adequate documentation is retained for 10 years to:
- Support amounts invoiced to the E-Rate program
- Demonstrate compliance with FCC rules
- Demonstrate that the costs of equipment and services requested for E-Rate support were properly allocated between eligible and ineligible items, locations or recipients of service
- Detailed Document Retention requirements are available on USAC's website.



#### **Documentation**

- Maintain a reconciliation worksheet that includes:
  - Service provider bill number
  - Billed service/product
  - Quantity and per unit cost
  - Extended billed amount
- Ensure:
  - Sum of all the extended bill amounts agrees to the total (undiscounted).
  - Amount for equipment or service requested on the BEAR form can be traced to the actual copies of the service provider bills.



#### **Document Retention**

- Applicants and service providers are required to retain documentation that demonstrates compliance with the statutory or regulatory requirements for all E-Rate program purchases of equipment and services for a period of at least 10 years after the last day of the applicable funding year or the service delivery deadline for the funding request.
- 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.
- For example, for recurring internet access service for FY2026, both the applicant and the service provider must retain all records until at least June 30, 2036.



#### **Document Retention**

- Keep all records such as:
  - RFP documents
  - Winning and losing bids
  - Vendor correspondence
  - Evaluation matrices
  - Documentation and memos of zero or one bid received (if applicable)
  - Other competitive bidding documentation
  - Asset and Service Inventories
- Records can be kept electronically: Use file names and folder names that are specific and descriptive to help you locate them more easily.
- The Document Retention List is available in the Resources section of the USAC website.

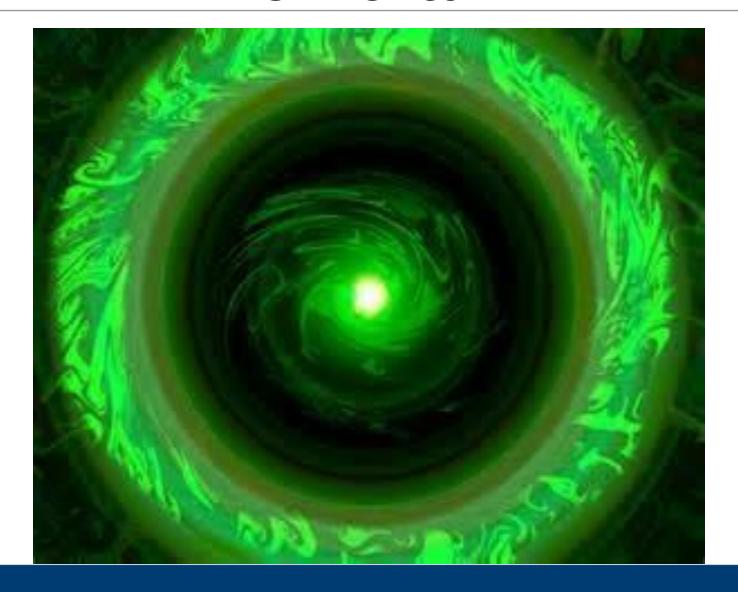
https://www.usac.org/wp-content/uploads/e-rate/documents/resources/e-rate-program-list-of-documents-to-retain.pdf

# Questions???





# **The Portal**



# E-Rate Productivity Center (EPC)

- Account Administrator Updates
- Account Administrator Roles
- Create User
- Student Counts
- Parent / Child Changes
- Profile Changes
- C2 Budget Section
- Examples



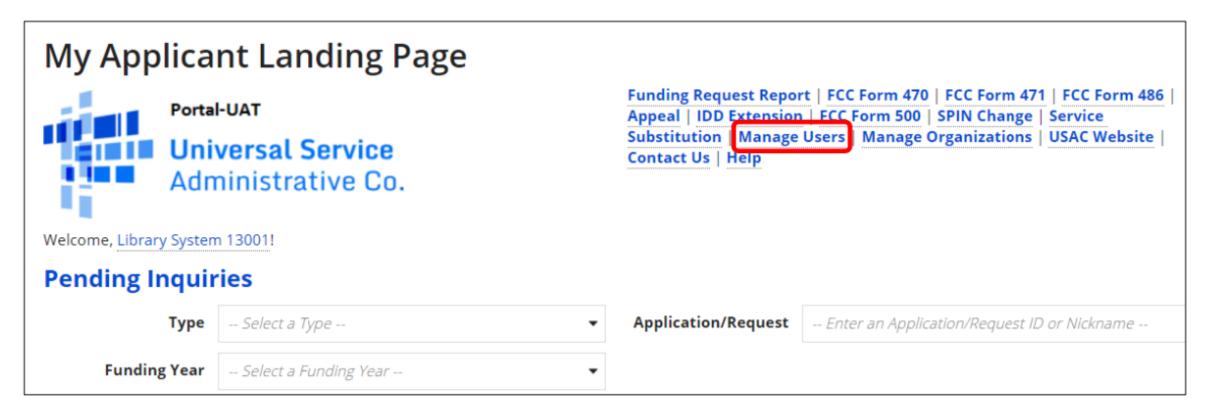
#### **Account Administrators**

- Every parent organization (independent school, independent library, school district, library system, consortium) in EPC needs an account administrator.
  - Consultants and service providers also need account administrators for their EPC accounts.
  - Account administrators can:
  - Create new users.
  - Modify the rights of existing users.
  - Modify information about their organization.
  - Link or unlink their organization to consulting firms and consortia.
  - Modify (change) the account administrator.



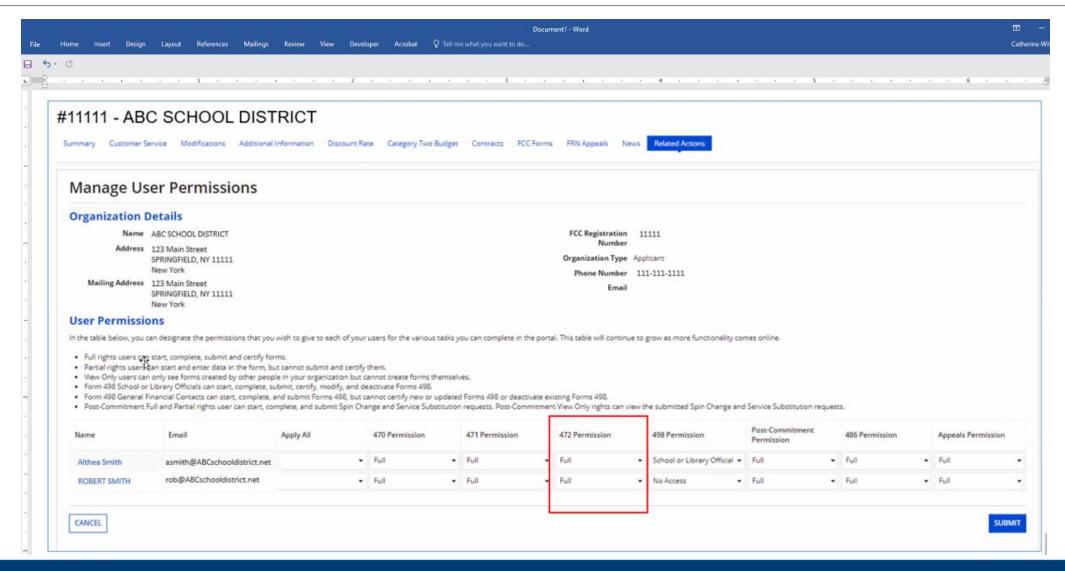
## **Managing Users**

• From your landing page, choose **Manage Users**.





### **User Permissions**





### **Entity Profile Changes**

- Parent and child entity attributes section now consistently labeled Applicant Information
- Layout improved for readability
- C2 Budget Information for both schools and libraries
- Student counts for school districts
  - Entered separately for discounts and C2 budgets
  - School districts can enter one number on the school district profile for C2 budget purposes.



### **Parent Update Information**

• From the landing page, click the parent entity name, either from the Welcome message at the top of the page or the first entry in the My Entities

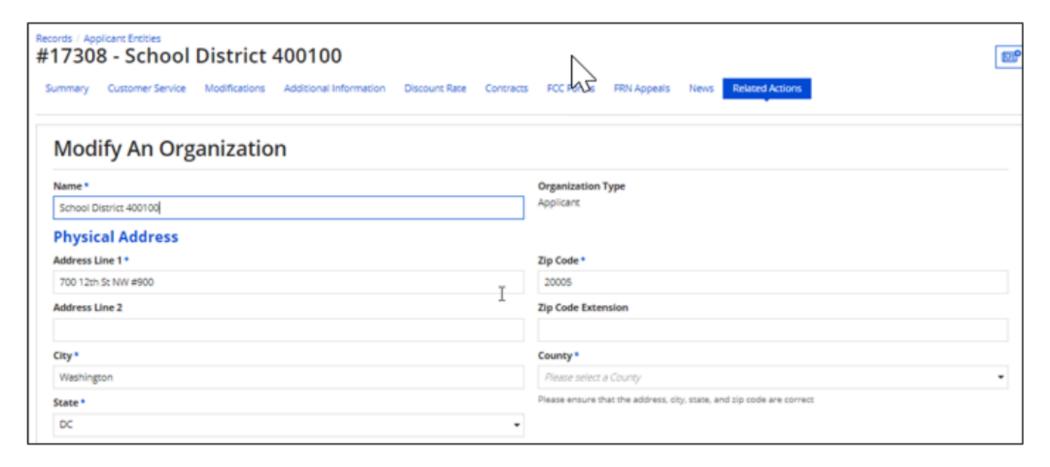
section.

My Applica	nt Landing	Page						
	Training versal Service ninistrative Co			Funding Request Report Form 500   SPIN Change Help	FCC Form 470   FCC Form   Service Substitution   N	m 471   FCC Form fanage Organizati	486   Appeal   IDG lons   USAC Websi	Extension   FCC te   Contact Us
Welcome, School Distric	t 4001001							
Pending Inquir	ries							
Туре	− Select a Type − •			Application/Request	Application/Request — Enser an Application/Request ID or Nickname —			
Funding Year	Funding Year - Select a Funding Year							
							APPLY FILTERS	CLEAR FILTERS
Pending COMMD Inquiries are not included.								
Application/Request N	Number	Type Nickna	ame Inquiry Name	Outreach Type	Date Sent	Due Date	Extn.	Status
Notifications Notification Type Funding Year	Please select a value  - Select a Funding Year				Status   All  Generated  Not Generated			
Notification			Issued Date					
Notification	U	escription	Issued Date	Generated B	y	Generated On		
			No iter	ns available				
My Entities								
Entity	Entity Entity Number		City	5	tate	Zip Code		
School District 400100 17308		Washington	0	c	20005			
School 1 In District 400100 18006		DC	0	c	20005			
School 2 in District 400100 18007			DC	0	c	20005		
School 3 In District 400100 18008			DC		C	20005		



### **Parent Entity Profile**

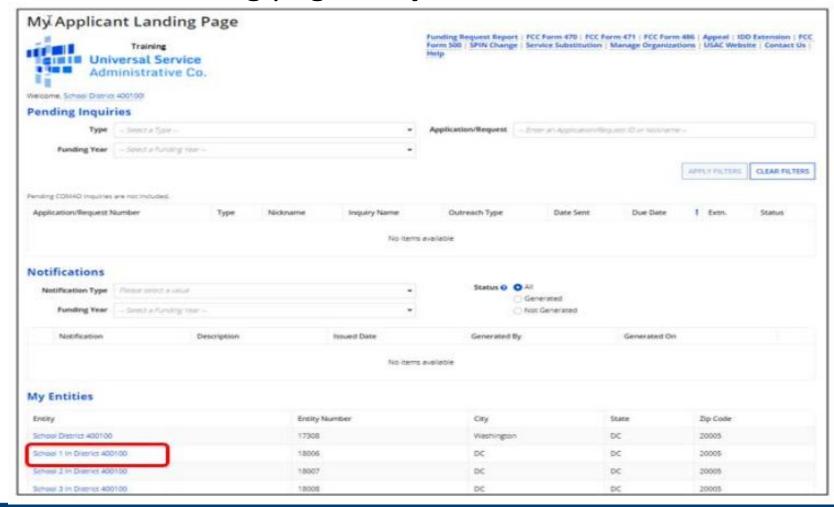
• You can then update many of the fields in the organization's entity profile.





### **Child Entity Profile**

• From the landing page's My Entities section, click the child entity name.



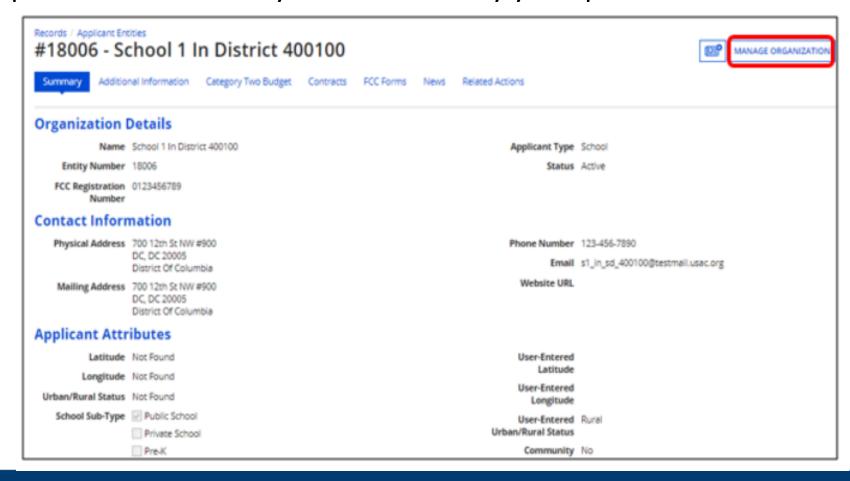


### **Child Entity Profile**

• From the child entity profile, click MANAGE ORGANIZATION.

You can then update the child entity in the same way you updated the

parent entity.







- Receipt or solicitation of gifts by applicants from service providers (and vice versa) is a competitive bidding violation.
- Service providers may not offer or provide any gifts or thing of value to applicant personnel involved in E-Rate.
- Gift prohibitions are always applicable not just during the competitive bidding process.
- Exceptions for gifts limited to items worth \$20 or less, including meals or prizes, and cannot exceed \$50 from one service provider to each individual per funding year.
- Watch our Gift Rules video for more details on the gift rules.



#### Gift Rule Prohibitions

- Gift prohibitions are applicable year-round, not just during the competitive bidding process
- Prohibition including soliciting and receiving any gift or thing of value from an applicant or a service provider participating in or seeking to participate in the E-Rate.
- Service providers may not offer or provide any gifts to applicant personnel involved in the E-Rate or vice versa.



#### Gift Rule Exceptions Examples

- "Modest refreshments not offered as part of a meal, items with little intrinsic value intended for presentation, and items worth \$20 or less, including meals, may be offered or provided, and accepted by any individuals or entities subject to this rule, if the value of these items received by any individual does not exceed \$50 from one service provider per funding year." See 47 C.F.R. § 54.503(d)(1).
- Single source =
   all employees, officers, representatives, agents, contractors, or directors of the service provider.



### Gift Rules - Examples

• A Service Provider has offered a school district employee lunch at a local sandwich shop three times during the course of the year. The value of the school district employee's meal is \$9 each time. The total value of the gifts is \$27. No other gifts are received by this employee from this provider.



### Gift Rules - Examples

- A Service Provider has offered a school district employee lunch at a local sandwich shop three times during the course of the year. The value of the school district employee's meal is \$9 each time. The total value of the gifts is \$27. No other gifts are received by this employee from this provider.
- OK The meals fall in the \$20 per instance and \$50 per year exception and there is no rule violation.



### Gift Rules - Examples

 A school employee and his spouse are invited by a service provider to attend a play and tickets have a face value of \$30 each. The aggregate market value of the gifts offered on this single occasion is \$60.



## Gift Rules - Examples

- A school employee and his spouse are invited by a service provider to attend a play, tickets to which have a face value of \$30 each. The aggregate market value of the gifts offered on this single occasion is \$60.
- Not ok The tickets are \$40 more than the \$20 limit. The employee may not accept the gift of the evening of entertainment. He and his spouse may attend the play only if he pays the full \$60 value of the two tickets.



## Gift Rules - Examples

 A service provider's spouse is the town librarian. The service provider takes the librarian to dinner at the cost of \$40 and gives them a \$100 gift.



#### **Gift Rules**

- A service provider's spouse is the town librarian. The service provider takes the librarian to dinner at the cost of \$40 and gives them a \$100 gift.
- OK The service provider may give the librarian a birthday gift exceeding \$20 as long as it is not reimbursed by the company and is being given based on their personal relationship.



## **Gift Rules**

• Three service provider employees invite a tech director to join them at a golf tournament at their company's expense. The entry fee is \$500 per foursome.



## **Gift Rules**

• Three service provider employees invite a tech director to join them at a golf tournament at their company's expense. The entry fee is \$500 per foursome.

 Not OK - The tech director cannot accept the gift even though he has an amicable relationship with the service provider employees. Since the fees are paid by the company, it is the business relationship, not the personal relationship and there may be business motivation behind the gift.



## Gift Rules – Charitable Donations

- Gift rules are not intended to discourage charitable donations as long as the donations:
  - Are not directly or indirectly related to E-Rate procurement activities or decisions, and
  - Are not given with the intention of circumventing competitive bidding or other FCC rules



- Gifts solicited or accepted indirectly
- "A gift which is solicited or accepted indirectly includes a gift: (1) Given with the employee's knowledge and acquiescence to his parent, sibling, spouse, child, or dependent relative because of that person's relationship to the employee, or (2) Given to any other person, including any charitable organization, on the basis of designation, recommendation, or other specification by the employee except as permitted for the disposition of perishable items or payments made to charitable organizations in lieu of honoraria." See 5 C.F.R. § 2635.203(f).



- Gifts solicited or accepted indirectly
- Donations made indirectly through a third party, such as a non-profit, would be prohibited if the organization is used as a shell to disguise a directed gift.
  - A service provider directing its foundation to provide a cash donation equal to the value of the applicant's non-discount share is a prohibited donation.
- Service provider cannot direct the donation and must relinquish control of the gift once provided to a non-profit.



## Gift Rules – Charitable Donations

- Allowable Charitable Donations
- Paid-for-exchange services at market rates, such as the purchase of advertising space, is neither a gift nor a charitable donation as long as it is not intended to influence the competitive bidding process.
  - For example, service providers purchasing advertising space on the high school football score board, for which they pay market rates, would not cause any violations.



- Potentially Allowable Charitable Contributions
- Cash, equipment, including sporting, musical or playground equipment, may be permissible if they benefit the school or library as a whole and broadly serve an educational purpose.
  - For example, a donation of books for a literacy campaign, given to a school by an E-Rate service provider, would be acceptable donation that benefits the school and broadly serves an educational purpose.



- Gifts solicited or accepted indirectly
- Example:
  - An employee must decline a gift of a personal computer pursuant to this rule and may not suggest that the gift be given instead to one of five charitable organizations, whose names are provided by the employee.
  - A service provider cannot donate computers to raffle with the caveat that they go to E-Rate recipients, or specific individuals or schools, or a subset of schools and libraries.



- Not Allowable
- Donations given for the purpose of influencing the competitive bidding process are rule violations.
  - Donations could either be directly from the service provider or solicited or accepted indirectly through a non-profit organization.



- Unallowable Charitable Contributions
- Service providers cannot offer special equipment discounts or equipment with service arrangements to E-Rate recipients that are not currently available to some other class of subscribers or segment of the public.
  - Free phone/tablet with purchase of service contract must be available to non-E-Rate customers as well
- Donations to cover the applicant's non-discount share



- Unallowable Charitable Contributions
- Equipment for a specific individual or group of individuals associated with or employed by an E-Rate participant.
  - Service provider may not give a gift to a teacher who helps draft a district's RFP for E-Rate eligible equipment, even if that teacher does not ultimately help select the E-Rate service provider.



- Prizes
- Raffle tickets, prizes, or door prizes that have a retail value of over \$20 violate the gift rules unless the event is open to the public.
  - "Open to the Public" means the event is free of charge and that members of the public at large typically attend such a gathering.
    - State Fair would qualify
    - State District IT Directors meeting would not qualify



- Widely Attend Gatherings
- "Widely attended gatherings" allow for free attendance and meals or refreshments at that event. See 5 C.F.R. § 2635.203(g)
  - Gathering is widely attended if:
    - Employee's attendance must be in the interest of the agency (i.e. school or library) and further its programs and operations, and
    - It is expected that a large number of persons will attend, and
    - Persons with a diversity of views or interests will be present.



- Conferences Permissible Actions
- Food, refreshments, instruction and documents given to all attendees at Widely Attended Gatherings are permissible.
- Trainings offered by state, regional or local government bodies or non-profits or trade associations that include those bodies are not considered vendor promotional training
  - Vendor promotional training means training provided by any person for the purpose of promoting its products or services. See 5 C.F.R. § 2635.203(g)



- Conferences Permissible Actions
- Service providers can host, sponsor, or conduct E-rate training, as long as they do not provide any gift that exceeds the gift exceptions
  - Service providers cannot help with preparation or completion of forms, or determining the services listed on the FCC Form 470 and/or RFP.



- Conferences Impermissible Actions
- Training or conference regarding one or few vendors services would not meet the definition of a Widely Attended Event even if many people attended.
  - Travel expenses, lodging, meals, and entertainment associated with the event would be considered gifts and therefore violations.
  - Free attendance when it would otherwise cost to attend is also a violation.
- Meals at a Widely Attended Gatherings not provided to all attendees would be subject to gift limits



- Conferences Registration Fees
- Service providers can offer an "educational discount" on the attendance fee to a Widely Attended Event as long as it is available to all employees of schools and libraries.
- Applicants cannot accept free attendance, paid by a service provider, even if the school or library has assigned the employee to attend the event.
- A Service provider cannot pay for or reimburse expenses for an applicant to speak at a conference on behalf of that service provider, or in any other setting, e.g. newspaper or magazine.



#### Links

- Mississippi E-Rate Page <a href="https://www.mdek12.org/OTSS/e-rate">https://www.mdek12.org/OTSS/e-rate</a>
- E-Rate Central <a href="https://e-ratecentral.com/">https://e-ratecentral.com/</a>

#### **USAC** Information

- Website <a href="http://usac.org/sl">http://usac.org/sl</a>
- EPC Portal <a href="https://forms.universalservice.org/portal/login">https://forms.universalservice.org/portal/login</a>
- Client Service Center (CSC) 1-888-203-8100



## Questions???





# Where to Go For Help

#### **State E-Rate Coordinator**

- Lee Bray — 601-359-5544 / <a href="mailto:lbray@mdek12.org">lbray@mdek12.org</a>

#### **Client Service Center**

- Call 1-888-203-8100
- They are extremely knowledgable and can see the "backend"

#### USAC's EPC Website: www.usac.org/sl

- Contains FAQs
- User Guides
- Video Tutorials

