E-rate 2024 Workshop 3: PIA Review, Form 486, and Invoicing

Massachusetts Board of Library Commissioners April 25, 2024



Before We Start...

- Slides/Updates:
 - Accurate to the best of our knowledge as of 4/24/2024)
 but...expect more changes
- Most updates are in SLD's News Brief issued generally monthly
 - Subscribe or view online on SLD web site (https://www.usac.org/e-rate/learn/news-brief/)
- Basic training videos available online at in USAC's Learn page at https://www.usac.org/e-rate/learn/



Before We Start...

- Questions are welcome!
 - Goal to is make session as useful as possible to you
 - Please save your questions until the end of the presentation
 - Please try to note slide #'s if you have a question about them
 - Q&A at end of session for as long as you need it



Quick Webinar Preview

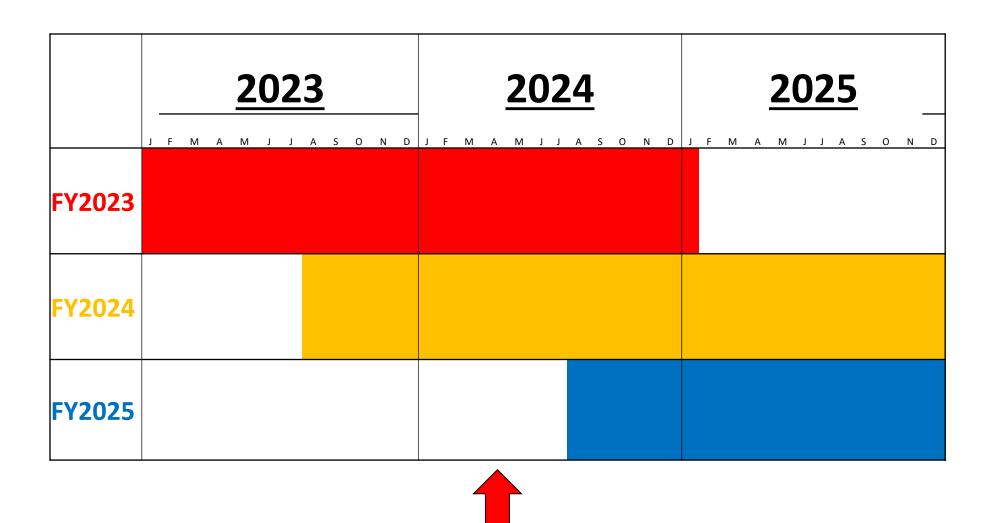
- Quick Program Overview
- PIA Review
- Form 486
- Invoicing
- Common Issues and Remedies
- ECF Update/Reminder

Quick Program Overview



Application Steps and Deadlines

- E-rate requires annual applications
- Funding years mostly don't overlap, but application processes do
- Important to remember where you are in the process for each funding year



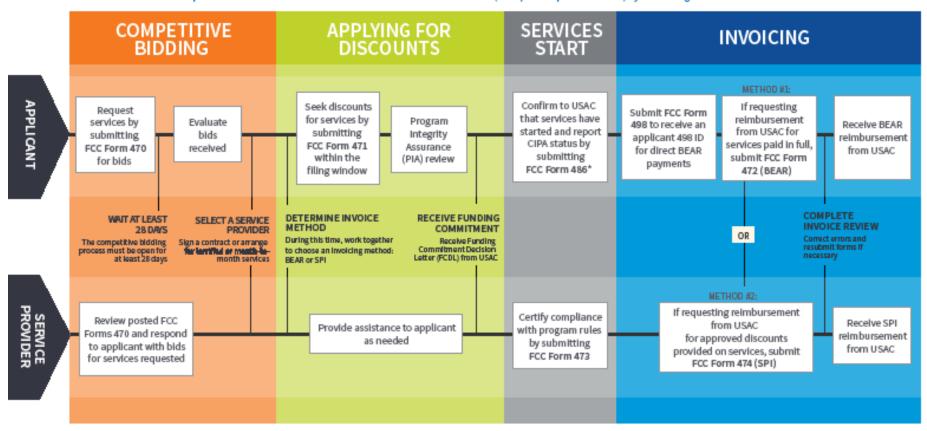


Schools and Libraries (E-rate) Program APPLICATION PROCESS

BEFORE YOU BEGIN:

APPLICANTS: Applicants must first have an entity number and an E-rate Productivity Center (EPC) account.

SERVICE PROVIDERS: Service providers must first obtain a Service Provider Identification Number (SPIN /Service provider 498 ID) by submitting FCC Form 498.



FOR MORE INFORMATION:

- Website: The application process is broken down in detail for both <u>applicants</u> and <u>service providers</u> on the Schools and Libraries Program website (<u>www.usac.org/slj</u>.
- · 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.



Application Steps and Deadlines

- Dates are somewhat flexible (but deadlines are not)
- Procurement/competitive bidding: Fall and early Winter prior to the Funding Year (includes Form 470)
- Contract Award and Form 471: ~Jan Mar prior to the Funding Year
- PIA Review: ~Spring prior to/Summer of Funding Year
- Form 486: ~Summer/early Fall of Funding Year
- Invoicing: either during or ~Summer/Fall after Funding Year



- Program Integrity Assurance (PIA) review takes place after the Form 471 has been filed
 - Goal is to review and process Form 471 in order to make award
 - PIA review can happen immediately after filing or months after filing, can be intensive or no questions at all
 - Critical to monitor e-mail or EPC to know when questions are posed (and be sure they're not missed) due to strict deadlines



- Form 486 filed within 120 days of start of service or 120 days of receipt of Funding Commitment Decision Letter, whichever is later
 - Filing late will progressively cost you funding
- Allows invoicing to start and includes CIPA certification



- Invoicing can take place during or immediately after Funding Year
 - Must be completed in a timely fashion or you forfeit the funding
- Can be done by vendor or applicant
- Invoicing (and invoicing review) now happens in EPC... (sort of)



Application Steps and Deadlines: Audits

- Audits typically take place after the fact
- Many different kinds of audits with different levels of detail
 - Critical to keep all your documentation to demonstrate compliance



E-rate Program: Different Roles

- Role of Consultants
 - Your consultants can:
 - Help you with your application, including filing
 - Answer PIA review questions for you
 - Assist you with every step
 - Your consultants should not:
 - Conduct your procurement or evaluation
 - File applications without your active input
 - Undertake actions without your knowledge and assent



E-rate Program: Different Roles

- Roles of Library Staff
 - E-rate cuts across three main areas of responsibility:
 - Technology
 - Business/Financial/Operations
 - Executive
 - Different libraries divide responsibilities differently
 - Critical to keep all levels involved/informed



E-rate Program: EPC

- E-rate Productivity Center
 - portal.usac.org
 - Everyone involved in your E-rate process should have an account
 - Account setup is a somewhat unusual multistep process
 - Can work with you individually



- Program Integrity Assurance review designed to ensure compliance with program rules
- All PIA review is done through EPC
 - Notification should come via email with a link to go directly to the PIA question area
 - Good to check EPC regularly just in case
 - Questions/responses all in EPC



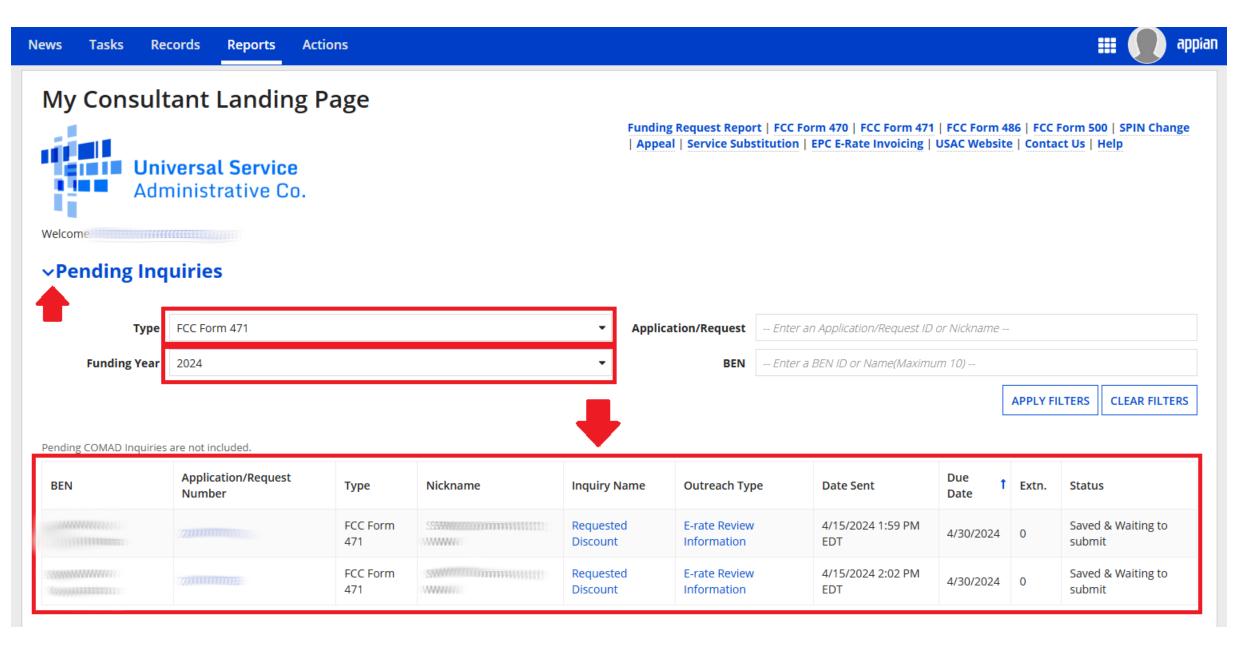
- PIA review varies widely
 - Some applications get no questions at all while others get many
 - Questions can be extremely general or extremely specific
 - Goal is to ensure compliance with program rules -- it's important to understand the rules behind the questions since the questions are often misleading
 - Can be used to make allowable corrections to the forms



- PIA review varies widely (cont'd)
 - All questions are on a timer (typically 15 days)
 - Some follow up questions have drastically shorter timers
 - Critical to answer questions before timer runs out
 - Can always request extensions
 - Generally unanswered questions result in applications being denied
 - Libraries CAN work with vendors to answer the questions

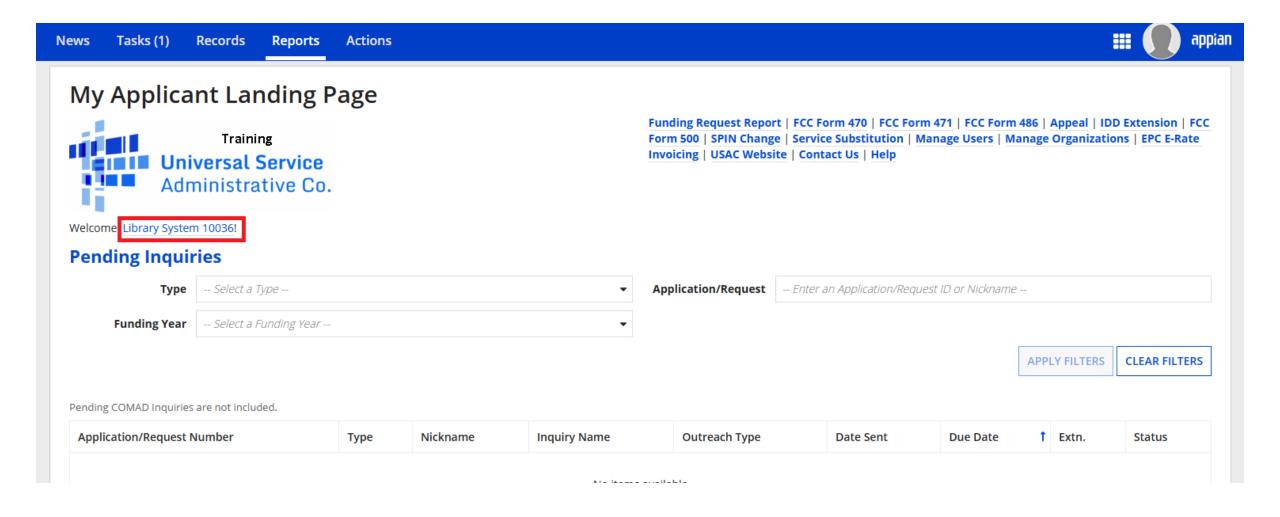


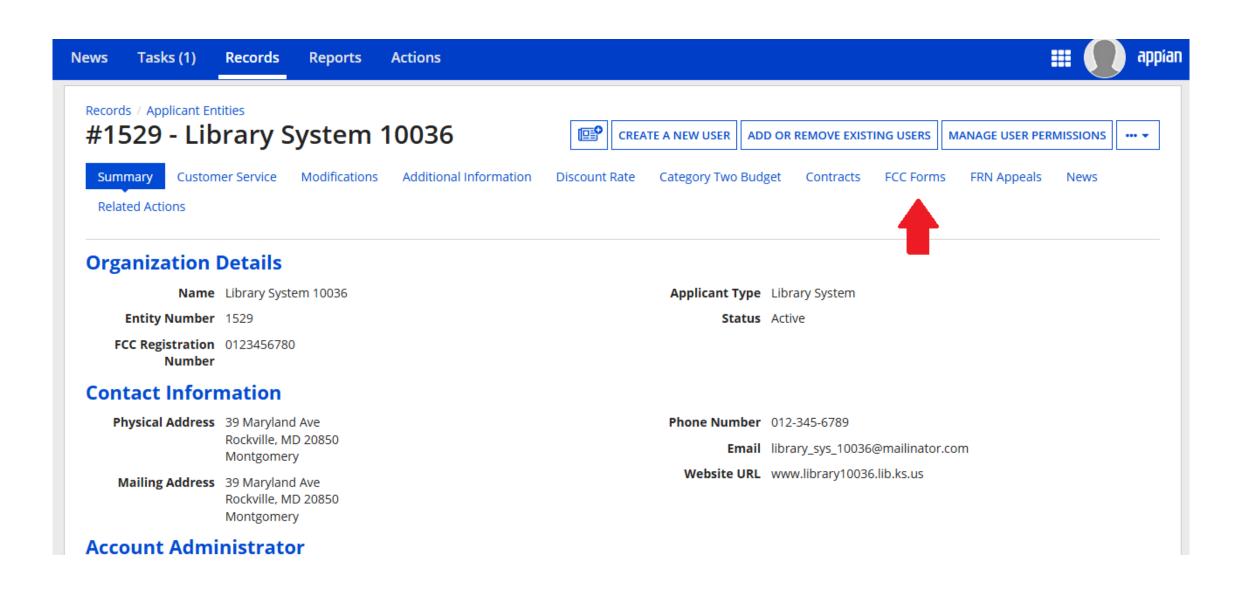
- Three ways to check for PIA questions:
 - Easy Way: follow link in email
 - Less Easy Way:
 - Log into EPC
 - Select "Form 471" for the "Type" and "2024" for the Funding Year under "Pending Inquiries"
 - Click "Apply Filters"
 - If there are any requests, they will show in the list between "Pending Inquiries" and "Notifications"
 - Click on the "Inquiry Name"

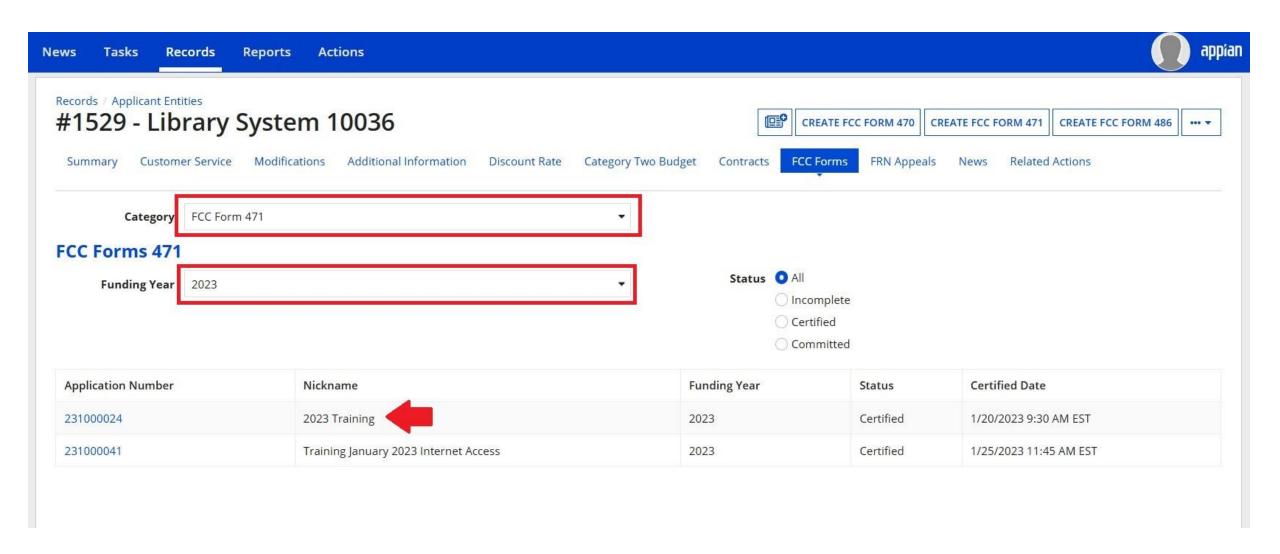


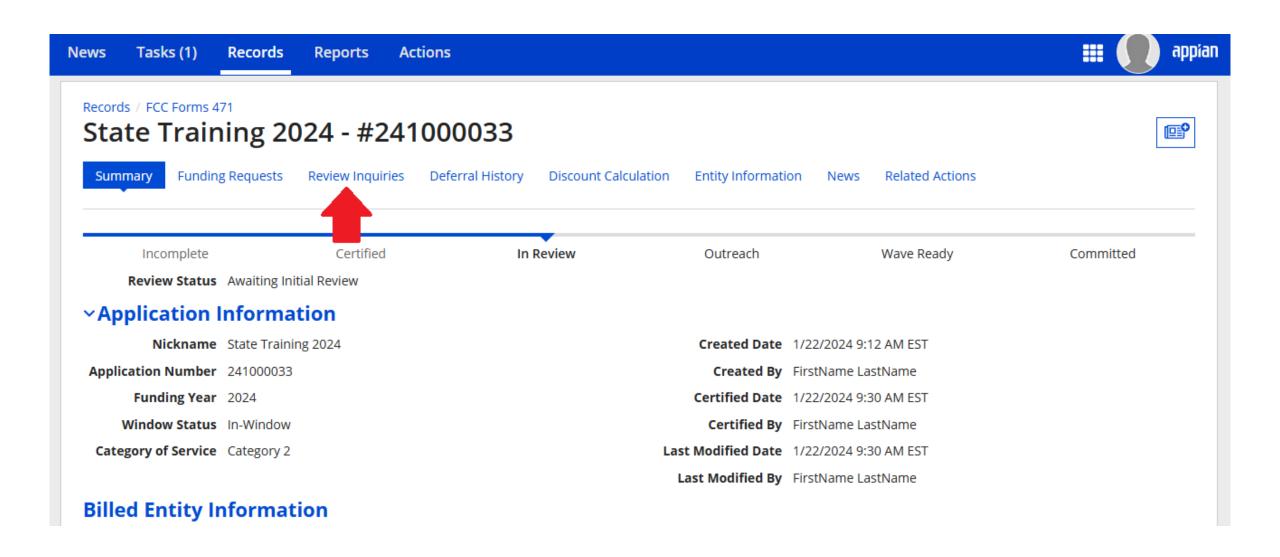


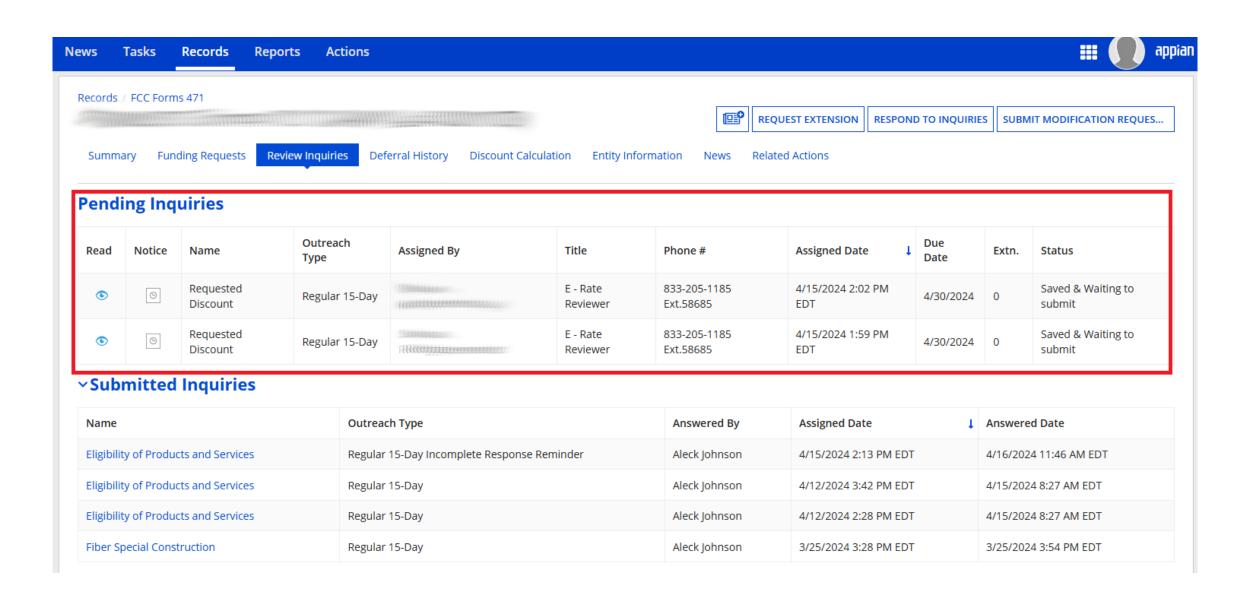
- The Hard(er) Way to Check for PIA Questions
 - Log into EPC
 - Click on the name of the applicant (if applicable)
 - Click "FCC Forms" on the top
 - Select "Form 471" and the appropriate funding year from the drop downs
 - Click on the application in question





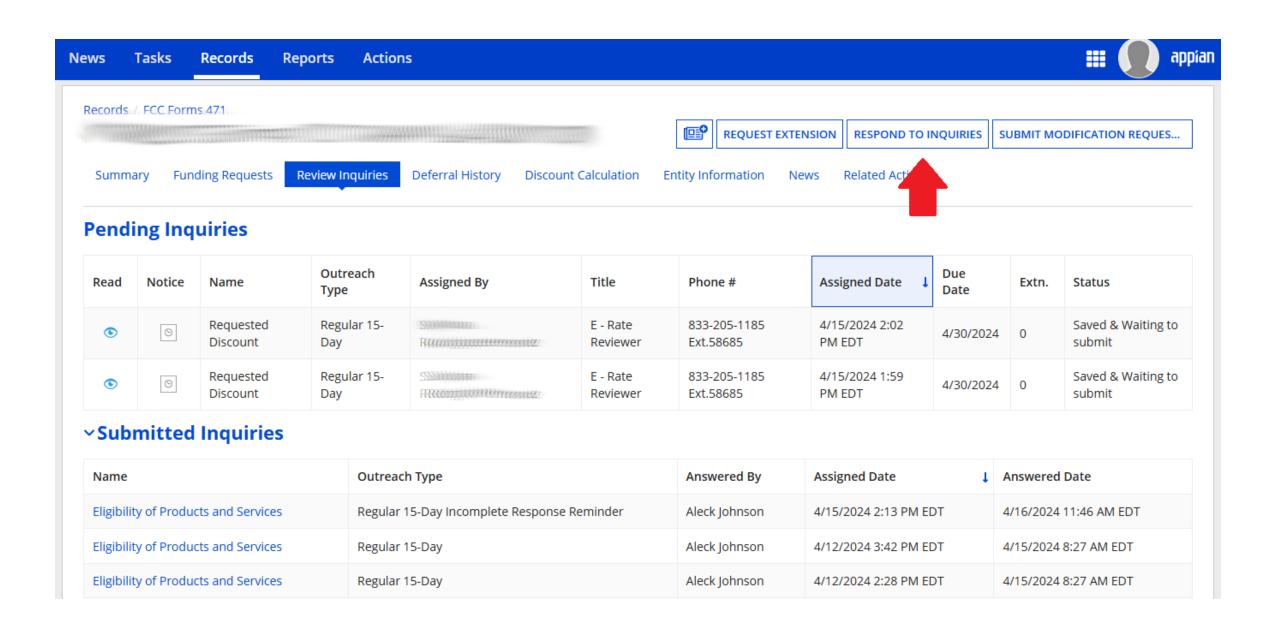


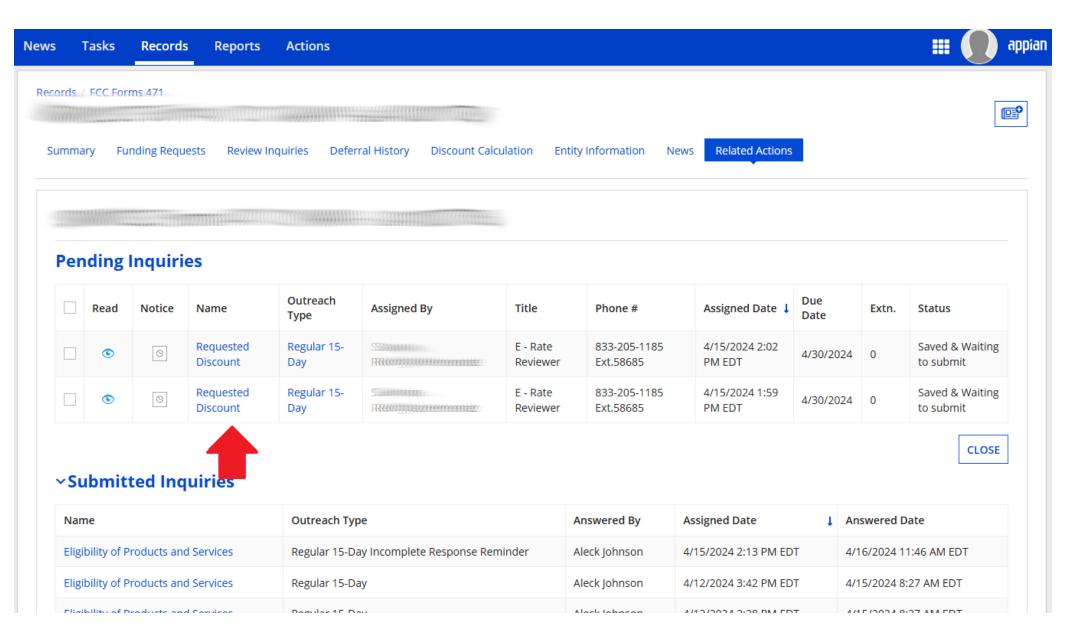


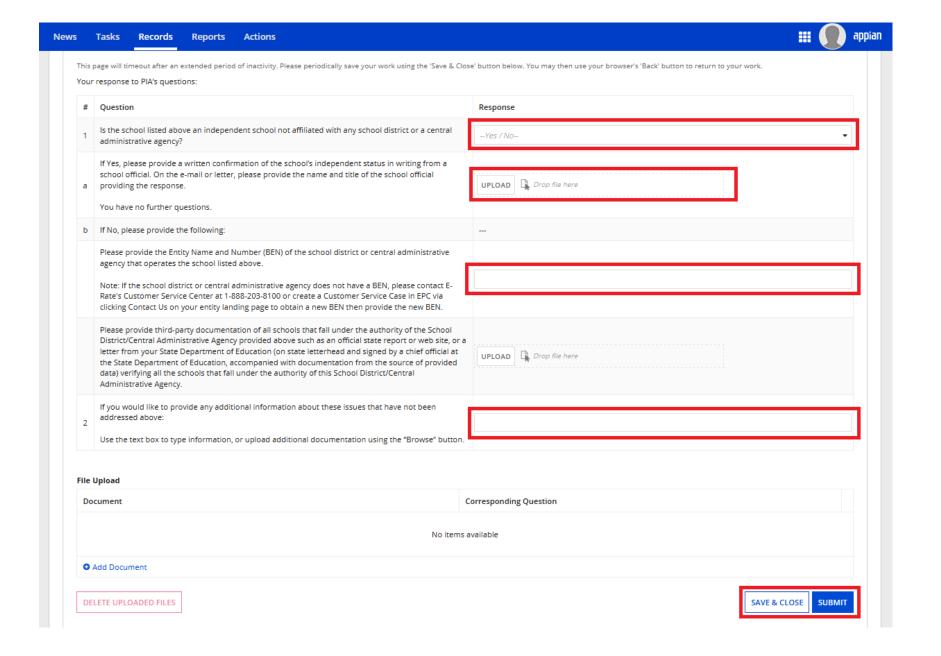




- Responding to PIA Inquiries:
 - If you have inquiries listed, click on "Respond to Inquiries" at the top
 - Then click on the "Name" of the individual inquiry to get the questions asked
 - You can save responses without submitting them by hitting "Save" rather than "Submit"
 - You can also request extensions using the "Request Extension" button at the top of the page



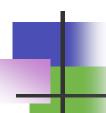






- Common C1 Questions/Modifications
 - Explanation of the services provided (WAN/IA)
 - Explanation of costs (esp. if taxes or multiple services are included in one line item)
 - They will (usually) break taxes or other services out into new line items
 - Removal of ineligible items or items delivered prior to funding year
 - Modification of eligibility percentages
 - Discount Calculation changes

- Common C2 Questions/Modifications
 - C2 Budget allocation
 - Square footage
 - Explanation of Costs (even if in contract) make, model, quantity
 - Modification of eligibility percentages
 - Modification of type of service (IC, BMIC)
 - Modification of the classification (switch/transceiver/module)
 - Discount Calculation



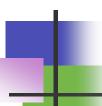
Common PIA Review Issues

- Failure of applicant to respond to PIA inquiries
- Failure of PIA reviewer to understand applicant responses
- PIA incorrectly modifies applications
 - Changing category of service
 - Changing quantities/amounts
 - ...often changed with just a notification and minimal time to respond



PIA Review Gotchas

- Be sure to answer all PIA questions
 - Even the "if yes, then..." when your answer is "no."
- Be sure to <u>submit</u> your PIA response (bottom right)
- Request extension if you need it
- Email erate@mblc.state.ma.us or your coordinator (me or Kate) for help if you are unclear on what is being requested
 - Questions often poorly worded, so make sure you understand the real question behind the question!



Post PIA Review

- USAC will issue the Form 471 Funding Commitment Decision Letter (FCDL)
 - In order to get the details, needs to the "generated" within EPC by the user
 - Will then be linked in "News" and under "Notifications"
 - Two parts announcement (PDF) and spreadsheet (XLS)
 - Keep these for your records!
 - If everything is correct, applicant can file the Form 486
 - If errors, appeal to USAC within 60 days

Form 486



- Form 486 is available in EPC from:
 - Landing Page (at top right, either at top level or under drop down)
 - under "Related Actions" and "Create FCC Form 486" from within Applicant profile page
- What Form 486 Does:
 - Confirms receipt of services
 - Confirms compliance with CIPA
 - Allows invoices to be filed



- When does CIPA apply?
 - When library-owned computers access E-rate supported services or equipment, the library-owned computers must be CIPA compliant
- Components of CIPA:
 - Internet Safety Policy
 - Technology Protection Measure
 - Public Notice and Hearing (or Meeting)



- Internet Safety Policy must address:
 - Access by minors to inappropriate content
 - Safety and security of minors when using email, chat rooms, etc.
 - Unauthorized access hacking, etc. by minors
 - Unauthorized disclosure, use, and dissemination of personal information by minors
 - Measures designed to restrict minors' access to material deemed harmful to minors (filter)



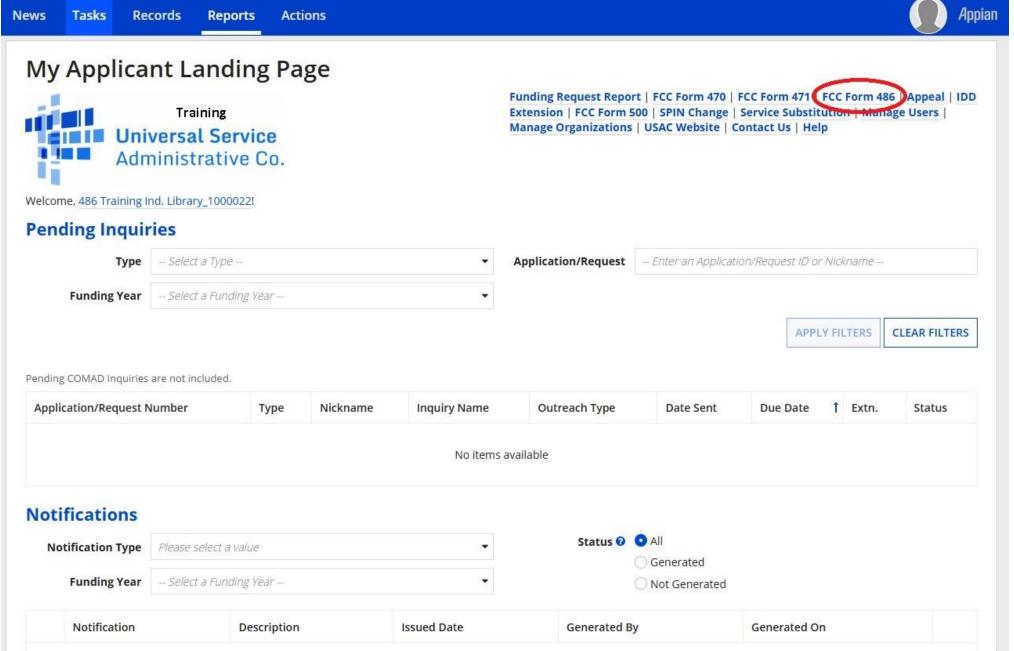
- Technology Protection Measure
 - Must be installed and active
 - No requirements about restrictiveness or effectiveness beyond "restrict minors' access to material deemed harmful to minors"
 - Applies to "its computers" (library computers)
 - Does not apply to library user-owned computers

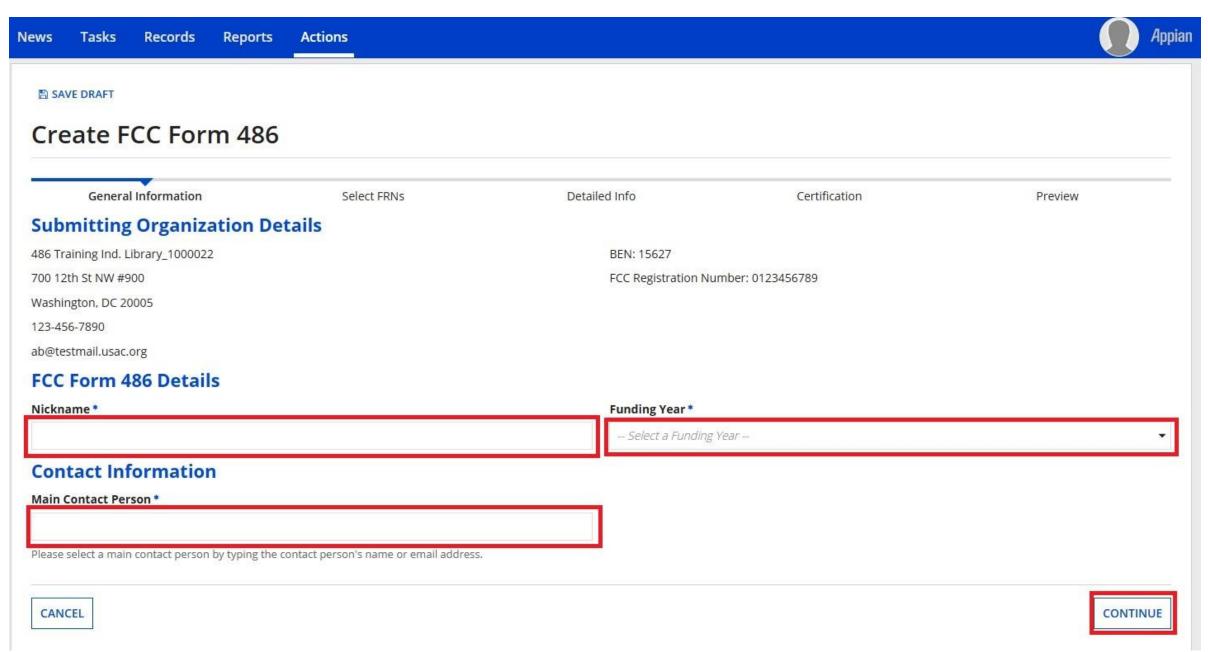


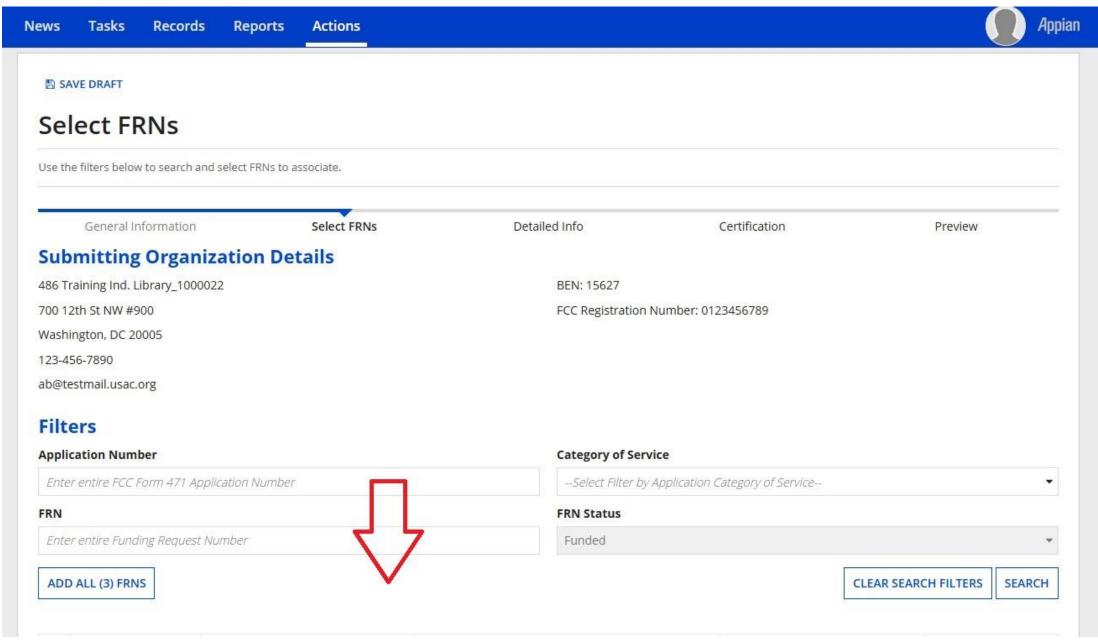
- Public Notice and Hearing
 - Library must have a meeting open to the public to discuss the Internet Safety Policy and Technology Protection Measure
 - Must be some form of public advertisement of the meeting
 - Typically website or local paper
 - Must be some record of the meeting
 - Typically minutes or other notes

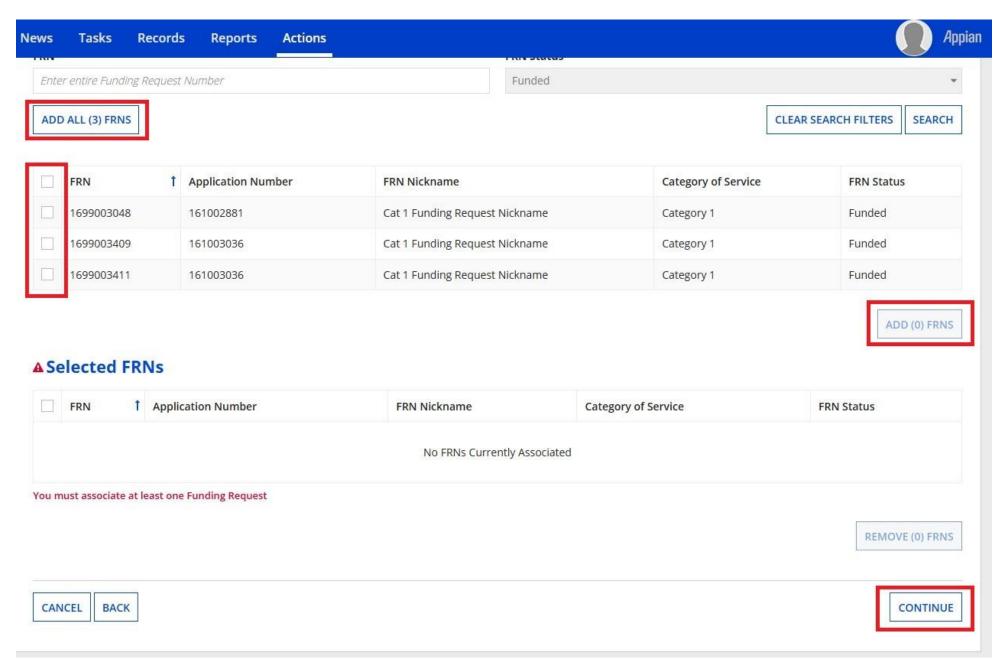


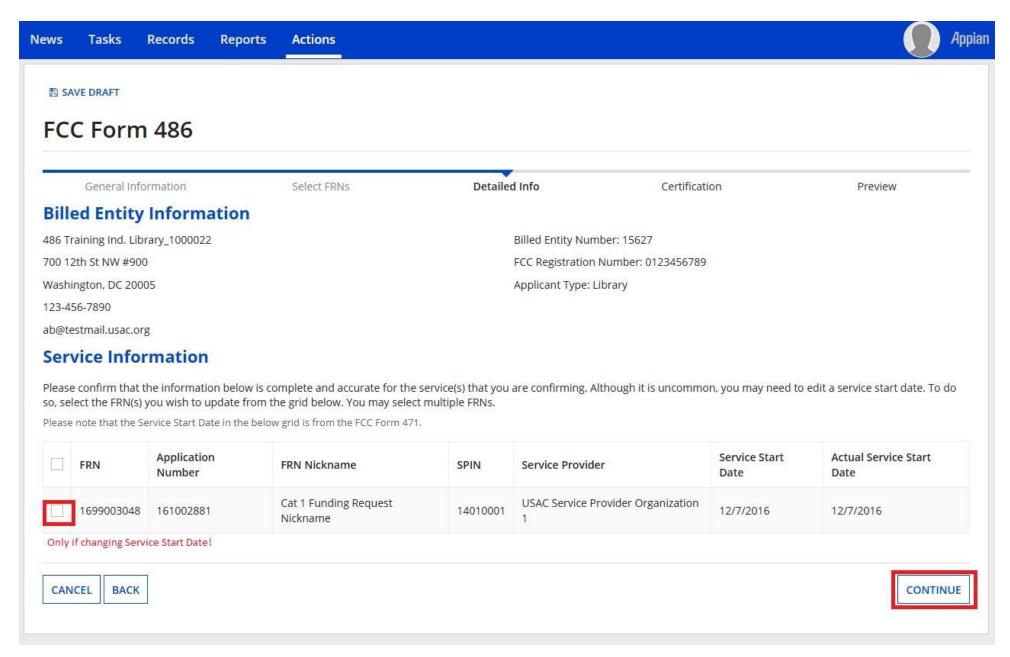
- CIPA and Audits
 - Must be able to document compliance:
 - Internet Safety Policy
 - Copy of policy
 - Technology Protection Measure
 - Logs or other evidence
 - Public Notice and Hearing (or Meeting)
 - Advertisement, website, minutes, newspaper reports, etc.

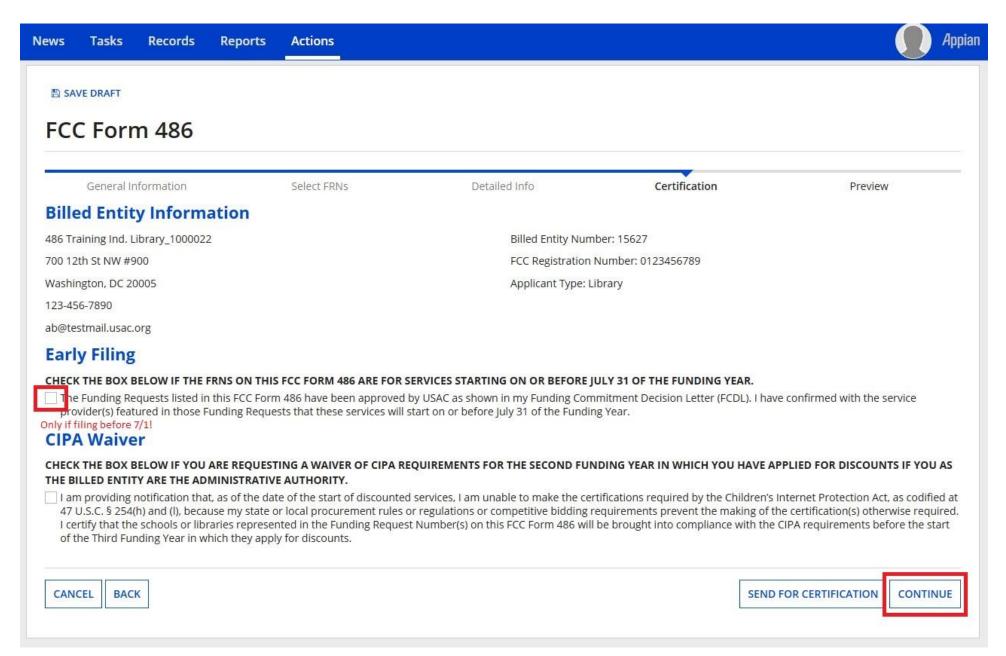


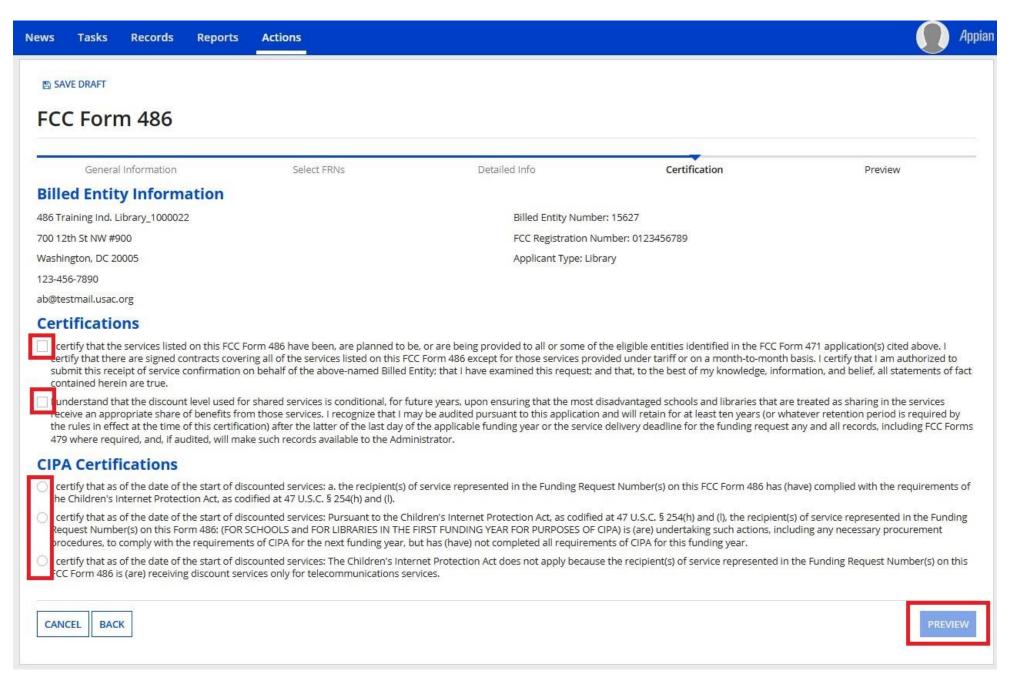


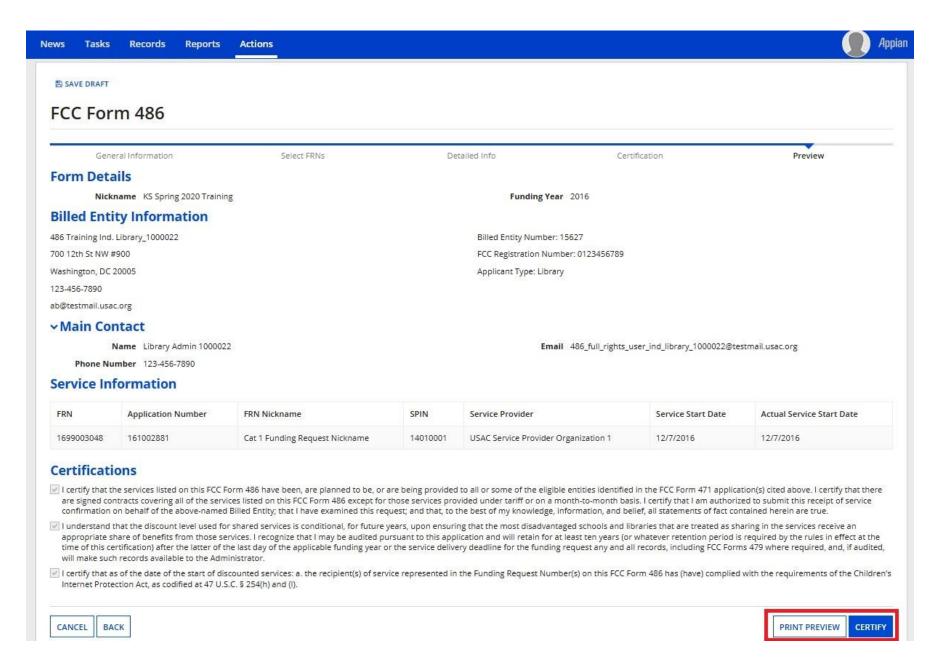


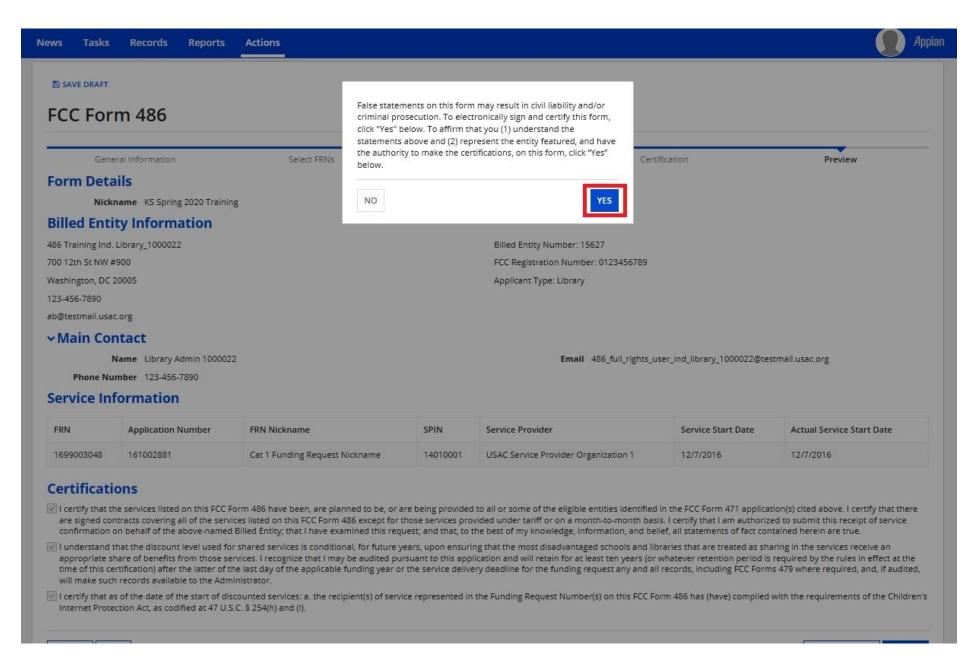












Invoicing



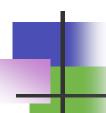
Invoicing: The Choice is Yours

- Invoicing mode: BEAR or SPI?
 - Applicants determine
 - Technically must indicate prior to filing 471
 - Best practice: indicate in the Form 470 and/or RFP
 - Different implications based on invoicing mode
 - Who is responsible for:
 - Documentation?
 - Accuracy?
 - All charges for FRN must have same invoicing mode



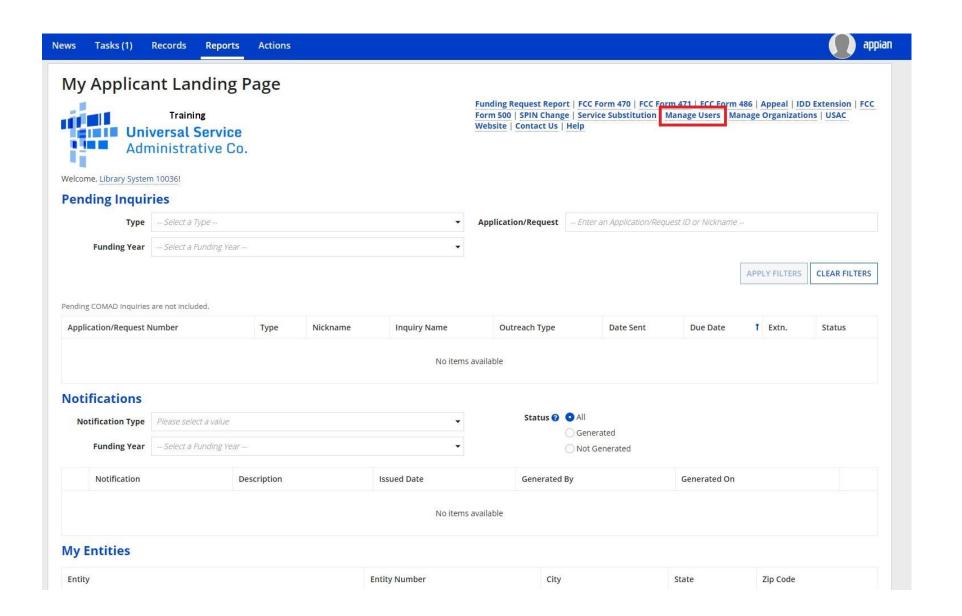
BEAR System Update

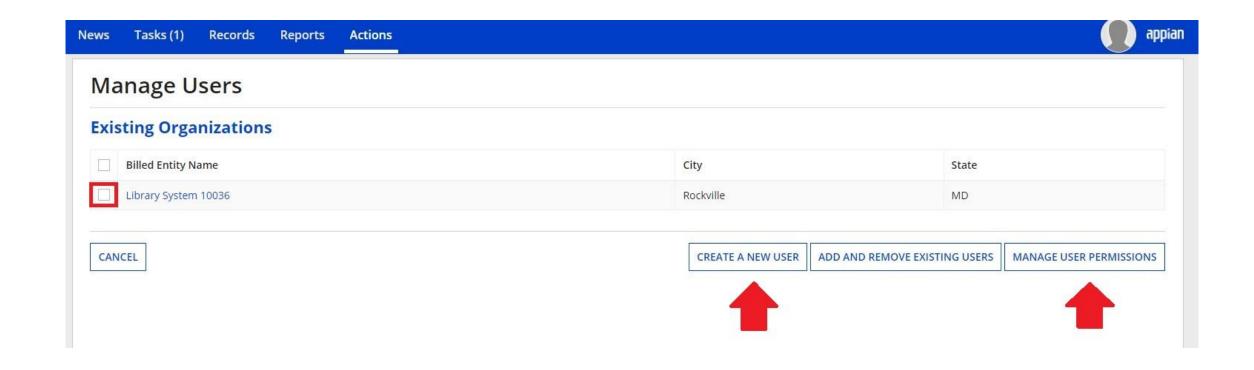
- BEAR is now available within the EPC portal (sort of)
 - No longer need separate authentication and login for BEAR
 - Not integrated in terms of look and feel or location
 - New BEAR requires users to have the appropriate permissions within EPC

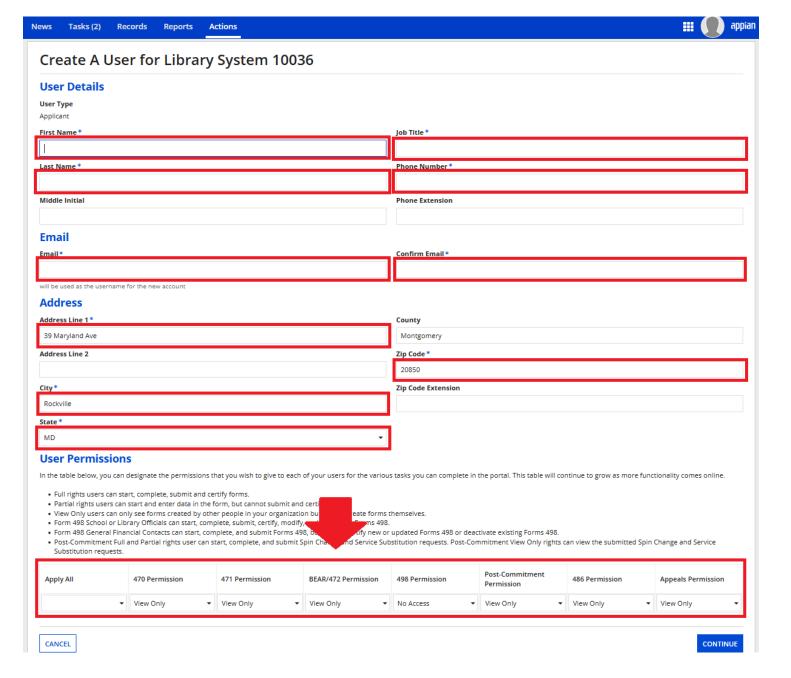


Rights Changes in EPC

- In order to access the new BEAR, users must be given the appropriate permissions in EPC
- Only "account administrator" has the rights to assign permissions for users at a library









Manage User Permissions

Organization Details

Name Library System 10036

Address 39 Maryland Ave

Rockville, MD 20850

Montgomery

Mailing Address 39 Maryland Ave

Rockville, MD 20850 Montgomery FCC Registration 0123456780

Number

Organization Type Applicant

Phone Number 012-345-6789

Email library_sys_10036@mailinator.com

User Permissions

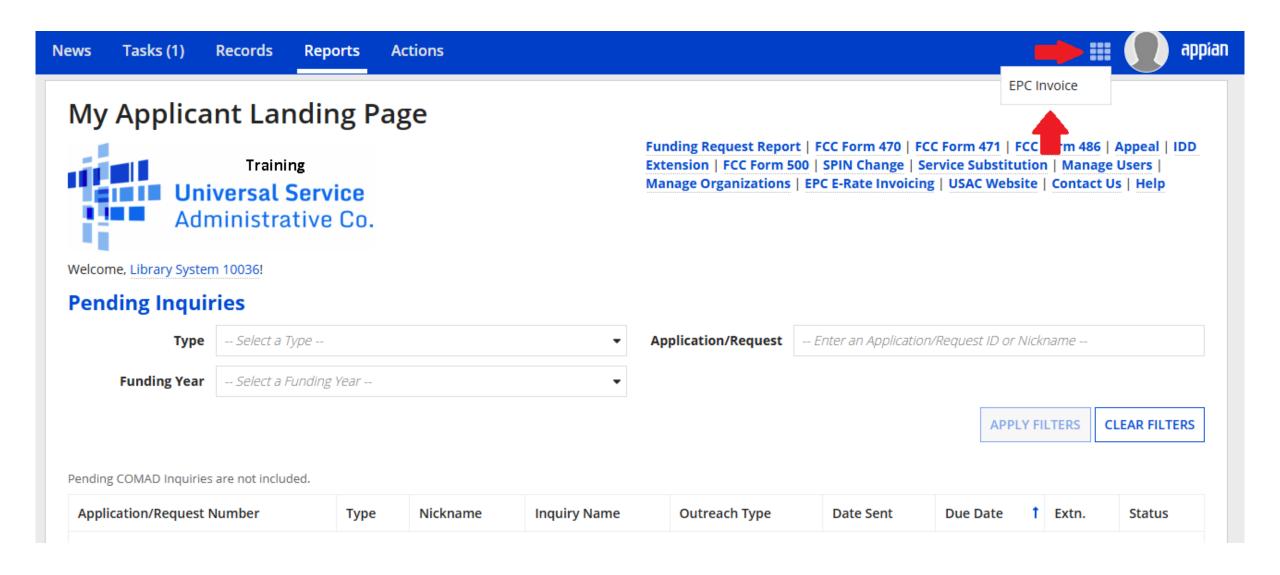
In the table below, you can designate the permissions that you wish to give to each of your users for the various tasks you can complete in the portal. This table will continue to grow as more functionality comes online.

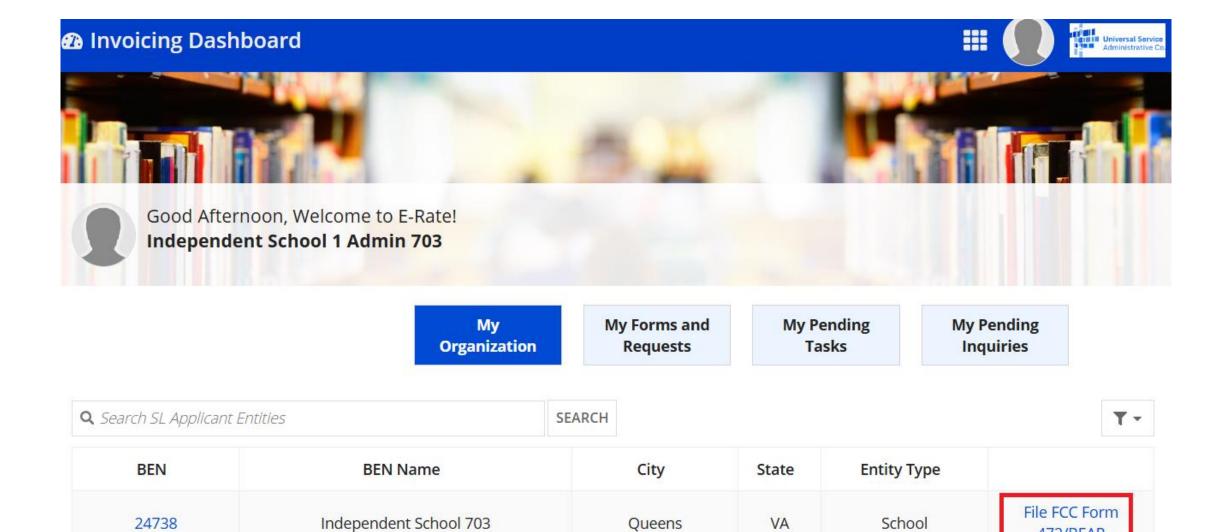
- · Full rights users can start, complete, submit and certify forms.
- · Partial rights users can start and enter data in the form, but cannot submit and certify them.
- · View Only users can only see forms created by other people in your organization but cannot create forms themselves.
- · Form 498 School or Library Officials can start, complete, submit, certify, modify, and deactivate Forms 498.
- Form 498 General Financial Contacts can start, complete, and submit Forms 498, but cannot certify new or updated Forms 498 or deactivate existing Forms 498.
- Post-Commitment Full and Partial rights user can start, complete, and submit Spin Change and Service Substitution requests. Post-Commitment View Only rights can view the submitted Spin Change and Service Substitution requests.

Name	Email	Apply All	470 Permission	471 Permission	BEAR/472 Permission	498 Permission	Post- Commitment Permission	486 Permission	Appeals Permission
FirstName LastName	ls_user_10036@mailinator.com	_	Full 🔻	Full •	Full 🔻	School or Library Official 🔻	Full •	Full •	Full •
Non-Admin Istrator	asjunk@hotmail.com		Full ▼	Full •	Full 🔻	School or Library Official 🔻	Full •	Full 🔻	Full 🔻

CANCEL

SUBMIT





472/BEAR





OMB Number 3060-0856 Form 472

Basic Information

Invoice Line Item Summary

Preview

Certify Form 472

Independent School 703 (BEN: 24738) Billed Entity Information

Independent School 703

1112 East Ave

Queens, VA 14634

Billed Entity Number: 24738

FCC Registration Number: 2234567890

Applicant Type: School

Applicant FCC Form 498 ID: *

Please select an FCC Form 498

111-111-1112

Invoice Nickname

Please enter an invoice nickname here: *

0/35

Contact Information

Are you the main contact person?



DISCARD FORM

SAVE & CONTINUE







OMB Number 3060-0856 Form 472

Basic Information

Invoice Line Item Summary

Preview

Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016 Invoice Line Item

	Invoice Line Item Nu	mber FCC Form 471 Application Number		Funding Request Number (FRN)			Billing Frequency (FRN)			
	No items available									
					+ ADD LINE ITEM	🌶 EDIT LIN	IE ITEM	× REMOVE LINE ITEM		
						•				
BACK	DISCARD FORM							SAVE & CONTINUE		





OMB Number 3060-0856 Form 472

Basic Information

Invoice Line Item Summary

Preview

Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016 Invoice Line Item

Funding Request Number (FRN)

SEARCH

CLEAR FRN FILTER

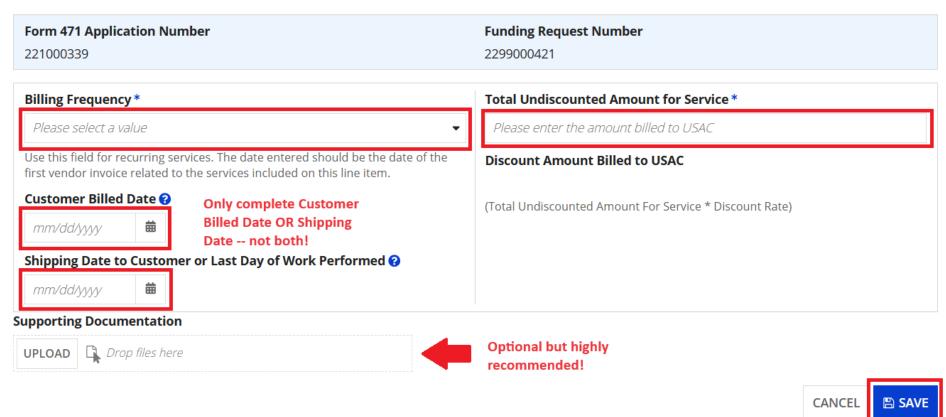
Select FRN ?

Please select a row to auto-populate the form details below.

FCC Form 471 Application Number	Funding Request Number (FRN)	Funding Request Nickname	Funding Request Amount	Service Provider Identification Number(SPIN)	Service Provider Name	Discount Rate
221000339	2299000421	FRN13_DT_P1_and_P2 _Tariff	\$1,324.80	14010001	USAC Service Provider Organization 1	90%
221000339	2299000419	FRN12_DT_P1_and_P2 _Tariff	\$1,324.80	14010001	USAC Service Provider Organization 1	90%
		FRN11 DT P1 and P2			USAC Service	



Add New Invoice Line







OMB Number 3060-0856 Form 472

Basic Information

Invoice Line Item Summary

Preview

Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016 A Billed Entity Certifications & Signature

Please check all boxes to certify.

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information, and belief, as follows.

- certify that the discount amounts listed in this Billed Entity Applicant Reimbursement Form represent charges for eligible services and/or equipment delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- certify that the discount amounts listed in this Billed Entity Applicant Reimbursement Form were already billed by the Service Provider and paid for by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- certify that the discount amounts listed in this Billed Entity Applicant Reimbursement Form are for eligible services and/or equipment approved by the Fund Administrator pursuant to a Funding Commitment Decision Letter (FCDL).
- acknowledge that I may be audited pursuant to this application and will retain for at least 10 years (or whatever retention period is required by the rules in effect at the time of this certification), after the latter of the last day of the applicable funding year or the service delivery deadline for the funding request any and all records that I rely upon to complete this form.
- certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

BACK

CERTIFY & SUBMIT





OMB Number 3060-0856 Form 472

Basic Information

Invoice Line Item Summary

Preview

Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016

Certification Confirmation

You have successfully filed FCC Form 472 #BEAR202400016

FCC Form 472 Record - BEAR202400016



Certifier Information

Name Independent School 1 Admin 703

Title Tester

Certified Date 4/22/2024 2:01 PM EDT

Address 1112 East Ave

Queens, VA 14634

Telephone 111-111-1111 ext. 14





Invoicing: SPI Forms

- SPIs are filed by the service provider
 - Must be filed after service provider has invoiced applicant for discounted amount
 - Applicants never see SPIs cannot verify accuracy of invoices
 - ... but may be responsible in an audit for SP errors

Invoicing Deadlines



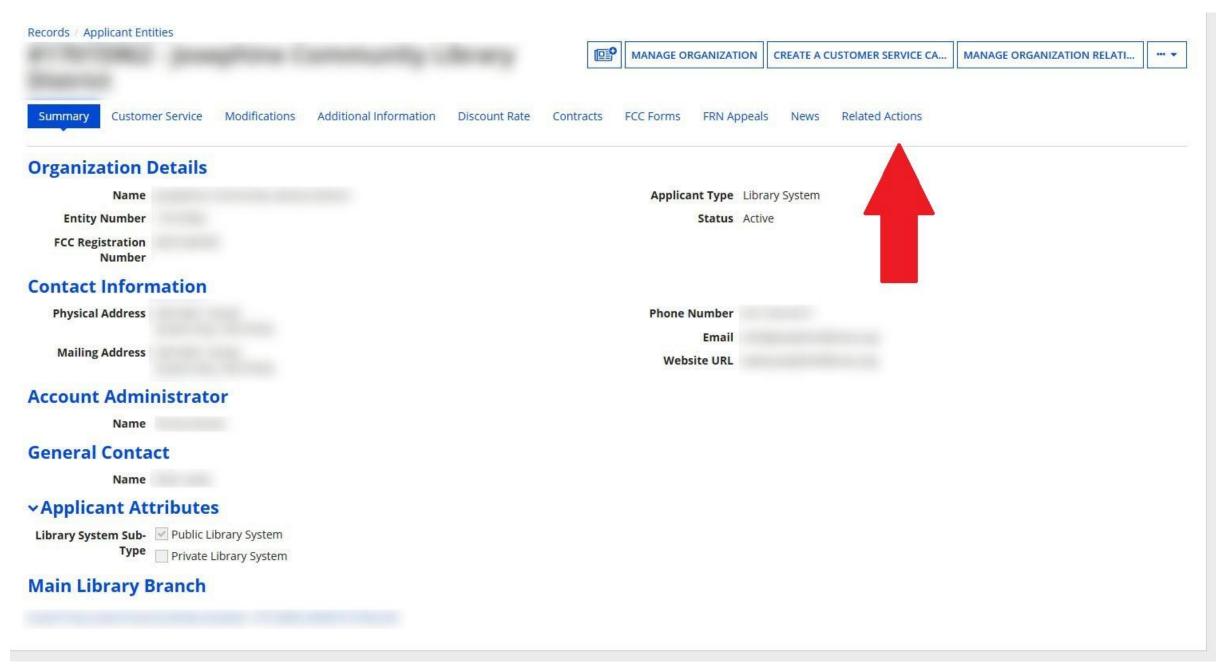
- Invoice deadlines
 - Generally 120 days after last date to receive service
 - For FY2023 Category 1 deadline is: 10/28/2024
 - For FY2023 Category 2: usually latest is 1/28/2025 (but depends on contract – could be earlier!)
 - No more pandemic automatic extensions
 - Invoice deadline can be extended...
 - ... but extension **must** be requested before deadline



Invoice Deadline Extension Request (IDER)

FY2015 and prior can be filed in BEAR portal

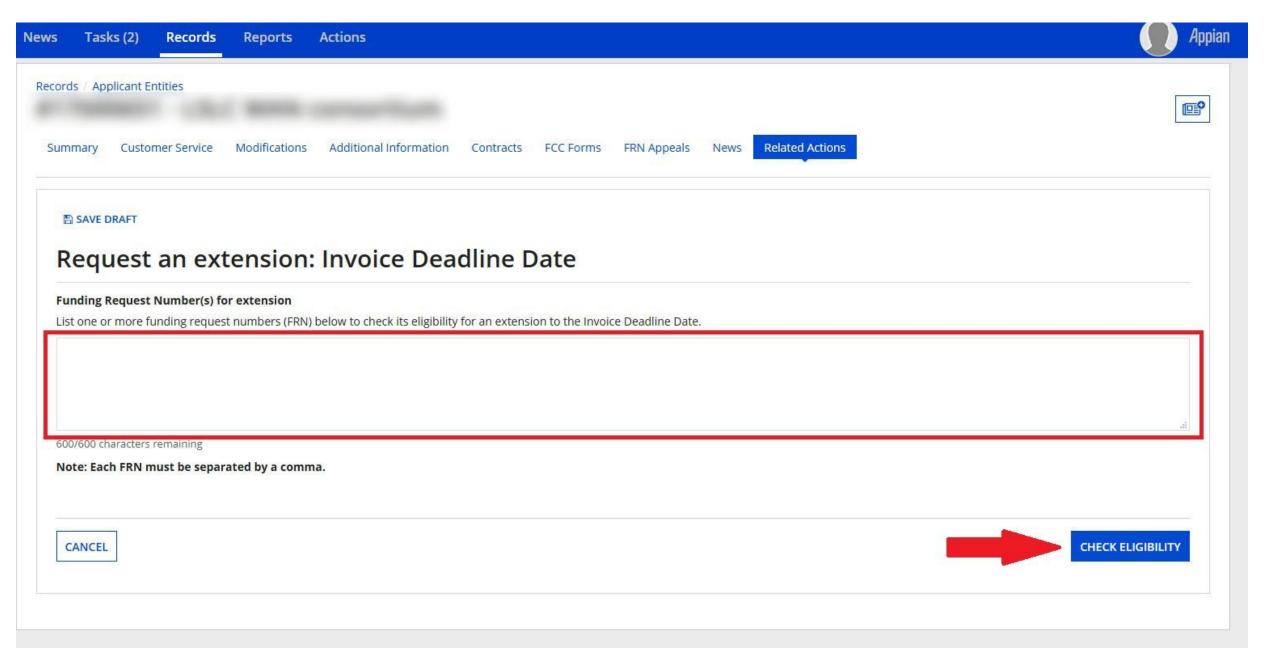
- FY2016 onwards requires EPC account with appropriate rights
 - In EPC, log in and click on your entity name...

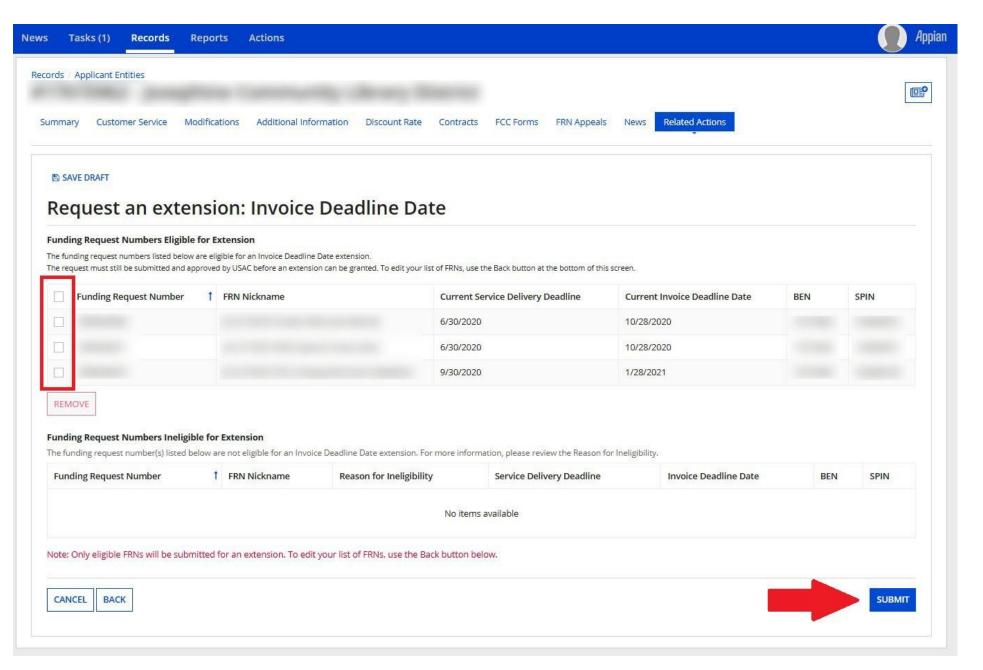




Invoice Deadline Date Extension Request

Request an extension to the invoice deadline for one or more funding requests.





Common Issues and Remedies



Common Issues and Remedies

- Many issues don't have remedies
- Issues here drawn from USAC's commonly cited list and issues that have affected library applicants across the country
- If you have general or programmatic questions, contact us or the electronic mailing list (e-rate@mblc.state.ma.us)
- For other specific questions, are having an issue, use the resources available to you – USAC, consultant, etc. – to find out more about the issue and possible solutions
- USAC is often wrong



Common Issues: Procurement

- Failure to list the proper Form 470
 - Remedy: change the Form 470 to the correct one
- Failure to do appropriate competitive bidding
 - Remedy: provide documentation showing proper procurement was done, or restart procurement/competitive bidding process (*if there is time*)
- Remember, procurement issues are the hardest ones to fix



Common Issues: Application Review

- Unable to reach/no response from applicant during PIA review
 - Remedy: ensure that contact info on application is valid, list applicant on forms as contact, and include alternative contact info
- Category 2 Budget Exceeded
 - Remedy: work with reviewer to remove Category 2 items until the total prediscount amount of the funding request is below the C2 budget. Make sure your vendor is also aware if doing SPI invoices!
- Funding Commitment reduced due to ineligible services
 - Remedy: ensure that all ineligible services are cost allocated out of the funding requests prior to filing Form 471. Appeal if USAC data is incorrect
- Funding commitment reduced due to missing documentation
 - Remedy: supply the requested documentation



Common Issues: Application Review

- Services delivered outside funding year
 - Remedy: ensure services are delivered during eligible funding year period. If necessary, appeal to USAC
- Ineligible entities removed
 - Remedy: ensure that ineligible entities are cost allocated from the application. If entities are actually eligible, appeal to USAC
- No invoice filed or invoice filed late
 - Remedy: ensure invoice is filed prior to deadline, deadline extension is requested, and/or appeal to USAC
- Missing information in profile
 - Remedy: update profile information (address, sq. footage, locale code)



Final Thoughts

- Watch the e-rate@mblc.state.ma.us list and Newsbrief for updates and clarifications
- Sketch out your timelines and make any necessary changes vis-à-vis invoicing
- Don't be afraid to ask questions!
 - Ask us on e-rate@mblc.state.ma.us we love your questions!
 - CSB: 888-203-8100 or in EPC (under Actions "select", "Contact Us" to get answers from USAC)
- Make sure you stay in control of and monitor your applications
- Take advantage of E-rate if it can help you!

Questions?

