E-rate 2024-2025 Workshop 1: E-rate Update

MA Board of Library Commissioners

September 30, 2024

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Before We Start…

- Slides/Updates:
  - Accurate to the best of our knowledge as of 9/28/2024) but…expect more changes
- Most updates are in SLD's News Brief issued *monthly*
  - Subscribe or view online on SLD web site (https://www.usac.org/e-rate/learn/news-brief/)
- Basic training videos, webinar links, and more available online at in USAC's Learn page at https://www.usac.org/e-rate/learn/
- USAC is doing in person trainings, too!

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Before We Start…

- Questions are welcome!
  - Goal to is make session as useful as possible to you
  - Please save your questions until after 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

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Quick Webinar Preview

- MA Library Status Update for FY2023 and FY2024
- What's New: Hotspots and Cybersecurity Pilot
- Preparing for FY2025
- Q&A

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MA Library Updates for FY2023 and FY2024

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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

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Application Process in a Nutshell

- Procurement: Form 470 and (optional) RFP
  - Bid Evaluation and Contract Award
- Application for Funding: Form 471
  - PIA review and award of funding (FCDL)
- Notification of Services Starting: Form 486
  - Receipt of services and compliance with CIPA
- Invoicing: BEAR (Form 472) or SPI (Form 474)
- Post-Invoicing: Audits, reviews, etc.

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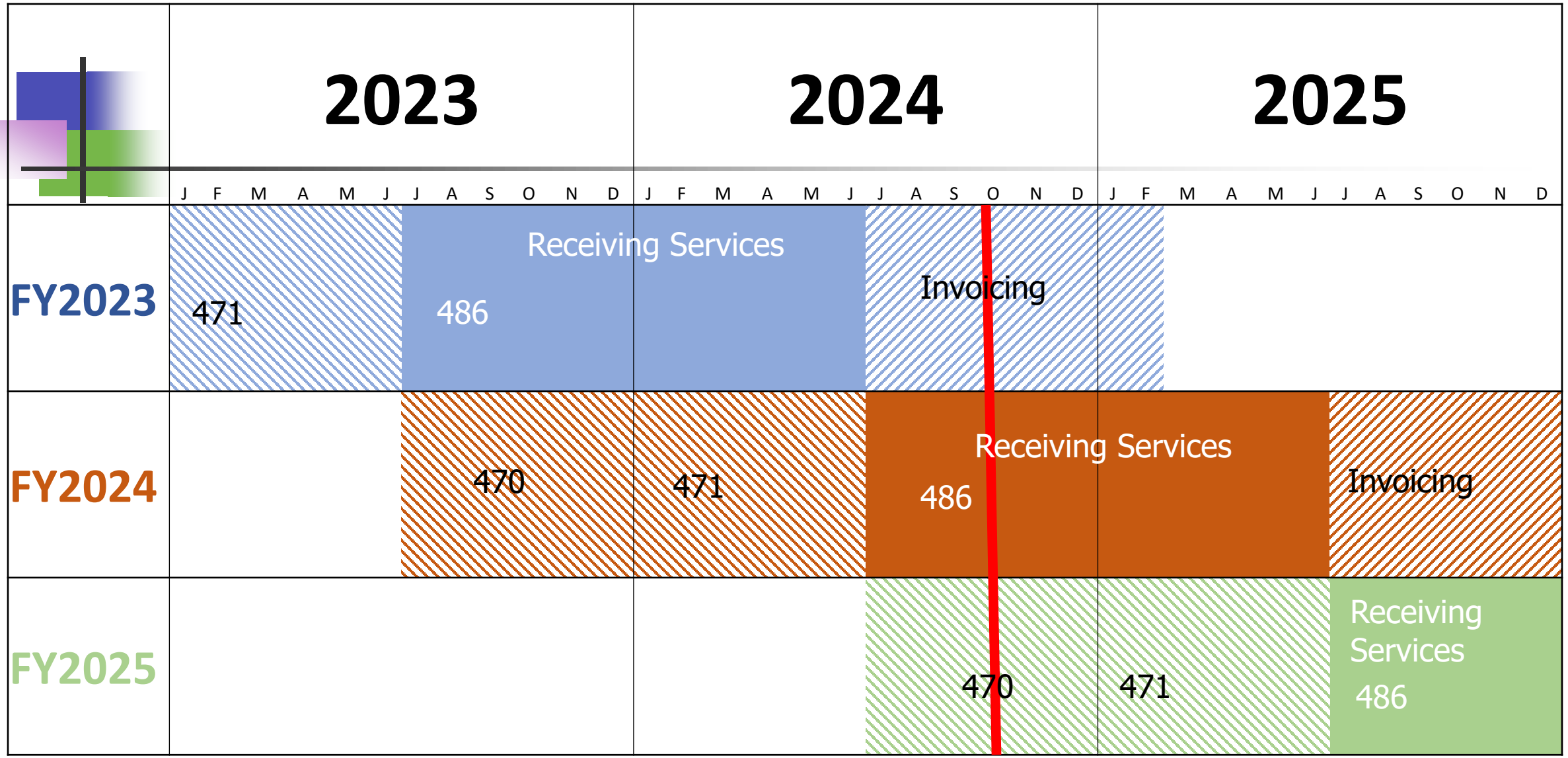

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Program Overview: MA Libraries

- FY2023 Stats (as of 9/28/2024)
  - Funding Requests
    - 21 Funding Requests Approved
    - $597,879.30 in commitments
    - 20 Funding Requests have already had invoices filed
    - $573,652.58 already disbursed

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Program Overview: MA Libraries

- FY2024 Stats (as of 9/28/2024)
  - Funding Requests
    - 23 Funding Requests Filed
    - 1 Funding Request Cancelled
    - 1 Funding Request Under Review
    - $933,253.46 approved and committed
  - Forms 486
    - Of 20 Funded FRNs, all 20 are covered by filed and certified Forms 486

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What's New: Hotspots and Cybersecurity Pilot Program

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Review of Eligible Services

- Eligible services divided into two categories:
  - Category 1 (Data and Internet) Services
  - Category 2 (Internal connections, Basic Maintenance of Internal Connections, Managed Internal Broadband Services)
- Eligible services list revised each year
  - ESL draft for FY2025 will have minor changes, mostly around the addition of Wi-Fi hotspots

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Review of Eligible Services: C1

- Category 1 (Data and Internet) Services
  - Ethernet Service
  - Leased Dark Fiber
  - Leased Lit Fiber
  - Self Provisioned Broadband Networks
  - T-1, T-3, OC-1, OC-3, etc.
  - Cable modem, DSL
  - Wireless Data Services*
  - Satellite
  - Terminating network equipment
  - **Wi-Fi Hotspots for Off-Premise Use**

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Wi-Fi Hotspots

- Wi-Fi Hotspots for off-premises use
  - Wi-Fi hotspots available in the new 470
  - Available for off-premises use only
  - Must be commercially available, portable, single devices
    - Does not include aircards, service for devices (smartphones, laptops, etc.) or any network equipment beyond the hotspot itself
  - Each hotspot device must have a line of service
  - No warehousing of devices
  - Budget limitation and device limitation in place for Wi-Fi hotspots (separate from C2 budget) – strict limitations on how much E-rate will cover
  - CIPA attaches with hotspots because they provide Internet access

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Wi-Fi Hotspots

- Wi-Fi Hotspots for off-premises use (cont'd)
  - Must go through the traditional Form 470 process
    - No grandfathering of existing contracts
  - Hotspots require updated AUPs stating that off-premises use must be primarily for an educational purpose
    - For libraries, AUP must state that the use be "integral, immediate, and proximate to the provision of library services to library patrons"
    - Must go through public notice and post updated AUP
  - Libraries are required to put in place content and other restrictions similar to what is used on-premises for off-premises devices (it is expected that service providers will help with this)
    - As always, filtering/CIPA only applies to library-owned computers – not the hotspots themselves

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Wi-Fi Hotspots

- Wi-Fi Hotspots for off-premises use (cont'd)
  - No duplicative funding
  - Recordkeeping requirements
    - Similar to ECF (make/model, serial, dates of loans/when informed damaged or missing or lost, service details)
    - BUT: no need for signed documentation from patrons
  - Usage requirements: must be used within each 90 day period
    - Service providers required to cut off service if not used
    - Service providers required to provide reports showing non-usage to allow library to fix

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Cybersecurity Pilot Program (CPP/CBR)

- Funds Advanced/Next-Gen Firewalls, Endpoint Protection, Identify Protection and Authentication, Monitoring/Detection/Response
  - All CPP services are ineligible for E-rate – if eligible for E-rate, then not eligible for CPP
- Requires CIPA compliance
- Application Process similar to E-rate, with some wrinkles:
  - Form 484-1, then a selection process
  - If selected, Form 470, Form 471 and Form 484-2, then invoicing
  - Application is through EPC portal
  - No grandfathered contracts unless they went through the E-rate process

Cybersecurity Pilot Program (CPP/CBR)

- Form 484-1 window opened 9/17/2024, closes 11/1/2024
- Form 484-1 seeks basic information about your "cybersecurity posture" – i.e. the various measures you are taking for cybersecurity
  - Also seeks information on how those measures align with the recommendations of CISA (which are for schools, but relevant; see https://www.cisa.gov/online-toolkit-partnering-safeguard-k-12-organizations-cybersecurity-threats)
- Timeframe post 484-1 unclear, but anticipated 470s could be released before end of 2024 with funding assigned in Spring 2025

Cybersecurity Pilot Program

- Form 484-1 guide available at https://www.usac.org/e-rate/cybersecurity-pilot-program/applicant-process/fcc-form-484-part-1/
- FCC has basic info at https://www.fcc.gov/cybersecurity-pilot-program
- USAC has info at https://www.usac.org/e-rate/cybersecurity-pilot-program/, including newsletter sign up
  - Finding information on USAC website can be challenging – don't hesitate to ask questions

Preparing for FY2025

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Preparing for FY2025

- The FY2025 Form 470 is available now
- Upcoming webinar on 10/17 to walk through the filing of the form
- Many things libraries can do now in advance of filing a Form 470

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Preparing for FY2025

- Determine current status of services
  - Current services and specifications
  - Current needs
  - Contract Status
- Before filing a Form 470, libraries must know what services on which they want to seek bids
  - Category 1 – Data and Internet Access
  - Category 2 – Internal Connections, Basic Maintenance of Internal Connections, and Managed Internal Broadband Services

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Prepare for Procurement

- Procurement process must be "fair and open"
  - Fair: every vendor evaluated fairly and equally
  - Open: same information available to all potential vendors
- This is the most critical part of the E-rate process
  - Difficult to remedy errors
  - Remediation usually involves starting over – which is a problem since you normally only find out about problems after it's too late to start over
- DO NOT GET VENDOR ASSISTANCE WITH PROCUREMENT

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Procurement: Options

- Option 1: Just file a 470 (no RFP)
- Option 2: File a 470 and RFP
- Option 3: Use State Contract
- Option 4: Use CABIO or Tribal Libraries Exception

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Procurement Option 1: Form 470

- Form 470 filing formally starts the bidding process
  - Includes services and quantities you're seeking
  - Can provide links or other information to bidding requirements and can provide narrative
- If outside documents need to be attached, see Option 2

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Procurement Option 2: 470 and RFP

- Request for Proposal (RFP) used in the E-rate process to specify needs and requirements in greater detail
  - Term "RFP" applies to ***any*** document/information that clarifies or modifies the requirements expressed in the Form 470
  - RFP is optional in E-rate – may be required based on local needs
  - Any and all RFP documents must be included
    - As new documents created (e.g. Q&A), must be attached
    - Updates can reset the 28 day clock if they are "significant"

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Procurement Option 2: 470 and RFP

- If you want to prepare an RFP, talk with us
  - Hundreds of RFPs available online and through EPC
  - Some sample RFPs available via MBLC
- More to say in October
  - Standard RFP components
  - Suggested RFP requirements

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Procurement Option 3: State Contract

- State Contract (ITT72) exists that allows libraries to bypass the Form 470 process
- Must still conduct a mini-bid process comparing the various vendors awarded under ITT72
- Guide for applying using state master contract at https://mblc.state.ma.us/programs-and-support/e-rate/state-contracts.php
  - Includes instructions, attachments, etc.

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Procurement Option 4: CABIO

- C1: Commercially Available Business class Internet Option (CABIO), aka "Low Cost, High Speed Internet Access"
  - Requirements:
    - Speed of at least 100 Mbps down/10 Mbps up
    - Commercially available to all non-residential customers at same price and terms
    - Must cost $3,600/yr. per library (or less) including any one-time charges
  - Examples: Comcast Business Fiber, Verizon Fios
  - Does not require procurement or bid evaluation process. Does require creating a contract record and Form 471
  - Library does need to certify that they have used a CABIO process on the Form 471

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Procurement Option 4: Tribal Libraries Exception

- C2: The Tribal Libraries Exception
  - Applies to all libraries, not just Tribal Libraries
  - Up to $3,600 in C2 can be sought each year for each library outlet without needing to file a Form 470
  - Cannot be aggregated across library outlets
  - Library does not need to conduct procurement/470 process or bid evaluation

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Category 2 Budgets

- Category 2 services are constrained by a pre-discount C2 budget
- FY2025 is the final year of the current C2 budget cycle
  - Current cycle total budget (pre-discount) is $20,544,688.50
  - Current cycle total used (pre-discount) is $1,501,265.83
  - Current cycle total remaining (pre-discount) is $19,043,402.67

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Final Thoughts

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Final Thoughts

- October 17 training will cover procurement and RFPs, Form 470, and dip into bid evalution
- More on bid evaluation, vendor selection, Form 471, EPC, 486, and invoicing in future trainings
- Don’t be afraid to ask questions!
  - Ask us on MBLC’s e-rate mailing list (e-rate@mblc.state.ma.us)
  - CSB: 888-203-8100 or in EPC (under Actions “select”, “Contact Us” to get answers from USAC)
- Take advantage of E-rate if it can help you!
- Let us know if there are other topics you’d like to see covered

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Questions?

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