# Emergency Connectivity Fund Overview, Updates, Q/A



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### **ECF** Overview

- \$7.17 billion passed by Congress in March 2021 as part of the American Rescue Plan
- Provides funding to public and nonpublic schools and public libraries to enable remote (off-campus) learning for students, teachers and library patrons who lack sufficient internet access and devices
  - Connected Devices = Laptops/Tablets/Chromebooks up to \$400/device
    - One per person
  - Internet Access = Aircards/Jetpacks/MiFi's up to \$250/device
    - Can request more for devices providing service to multiple students (buses)
    - Also, modems and routers are eligible
  - For remote learning <u>and</u> homework (not just when classes are virtual)
  - Off-campus means any location where education is occurring (homes, community centers, churches, school buses)
  - Devices may be brought to campus but can't be purchased <u>solely</u> for use at S/L
- Window 1: For purchases made between July 1, 2021 June 30, 2022
  - If funding remains, second window will open
- Funded at 100%; not partial (discounted) funding like E-rate
- ECF will fund construction of new networks or datacasting equipment if it can be proven that no commercial internet access service is available



### Restrictions/Conditions

- Schools must prove "reasonable estimate" to determine who would otherwise lack sufficient connectivity or devices to engage in remote learning
  - Libraries must obtain signed statement when devices are borrowed
- Not eligible: desktops, smartphones, spare equipment, filtering, stand-alone cameras/microphones, cases, Zoom licenses, on-campus equipment, sharing of Erate-funded Internet bandwidth
- No separate federal competitive bidding requirements imposed but S/L must comply with state and local procurements requirements
- Must be used "primarily" for educational purposes
  - May be used for other purposes when not needed for educational activities
  - Schools must restrict access to only students/teachers/patrons with appropriate credentials
- No double-dipping: Applicants cannot seek ECF funding for equipment or service that will be purchased with other pandemic-relief funding
- 10-year record retention requirement
  - Make/model/serial #/name of person loaned to/loan dates, etc.
- Applicants seeking reimbursements must have updated SAM.gov account before getting reimbursed

### Application Process

- Applications submitted in USAC's EPC Portal by August 13 deadline
- USAC will review all applications submitted in "window" and size demand
  - Applicants may receive PIA inquiries, similar like E-rate
  - Expect first wave of commitments to come in mid-late August
  - If demand exceeds \$7.1B, highest poverty S/L will receive priority until funds are exhausted
- Funding Commitment Letters issued to applicants
- Applicants purchase equipment or service and then seek ECF reimbursement by August 29, 2022
  - If applicants cannot afford to upfront the funds before seeking reimbursement, they can either:
    - Request a "prospective disbursement" from ECF
    - Request that vendor invoice ECF (vendors not required to agree)
- Funds deposited directly into school/library/vendor bank accounts



### ECF Updates



- Vendor quotes must include quantities
- Licenses must be bundled with device cost
- Manufacturer warranties (up to 3 years) must be bundled with the device cost
- Wi-Fi hot spots serving multiple users no \$250 cap
- Parked school buses access only for students/teachers
- Deadline to seek reimbursements is now August 29, 2022 if 471 lists service end date of 6/30/2022 (default)
  - Only exception is if equipment was received between July 1, 2021 and date 471 was submitted. Those FRNs have 60 days to invoice ECF.
- Cannot invoice for services that have not yet been received, even if pre-paid
- Can change vendors, make/model after 471 submitted
- Laptop/tablet leases are eligible, but only for prorated amount for FY 2021
- Don't need sam.gov registration if vendor will be seeking reimbursement



# Determining Unmet Need

- Only "reasonable estimate" of unmet need required at 471 stage. Must have documentation to support unmet needs at reimbursement stage
  - Before seeking reimbursement, obtain a signed statement from student or family attesting to unmet need at home, including EBB certification
  - Can seek ECF "commitment" for X number, but then only invoice for less, based on actual student data
    - Some districts will be invoicing in stages as devices are distributed throughout the year
- Ways to determine "reasonable estimates" for 471 stage:
  - Survey of students/families and/or teachers
  - NSLP eligibility
  - U.S. Census data
  - Other publicly available data
  - See <a href="http://e-ratepa.org/?page\_id=32310">http://e-ratepa.org/?page\_id=32310</a>

Form 471 Stage



Only "reasonable estimates" needed



Explain in 471 survey narrative how those estimates were obtained (source data, quantities, etc.)

Form 472 BEAR Reimbursement Stage

Must have documentation of "unmet need" required before invoicing.

Carefully consider this if your vendor is invoicing ECF

### Replacing School-Owned Devices

#### **STUDENTS**:

- If a school provides a laptop to each student and has legitimate reasons why <u>a school-owned device</u> is required to access their curriculum or Internet, and if that device is no longer sufficient to engage in remote learning, the district can request ECF support for a new connected device.
  - Explain this in the narrative
- If a school provides a laptop to each student but it is not required as part of the curriculum, and if the student does not have access to their own device while off campus that is sufficient to engage in remote learning, the district can request ECF support for a connected device for that student.
  - Explain this in the narrative

#### **TEACHERS:**

- If a teacher uses a school-provided laptop for remote learning, and that laptop is not sufficient to conduct remote learning, and if the teacher does not have access to their own adequate connected device at home, the district can seek ECF support for a connected device for that teacher.
- Obtain signed statement before seeking reimbursement from ECF

### ECF Form 471 Do's/Don'ts

- Different FRNs for Equipment/Internet
  - Aircards and monthly internet costs must be on separate FRNs
- Internet on buses cost > \$250 explain in narrative that it is serving multiple (x number) of students
- If device costs > \$400, just list \$400
- List "installation" on separate FRN Line Item under "taxes/reasonable charges" don't have to use separate FRN for "services"
  - Must be with same vendor
  - Seeking clarification on "white glove" installation which includes asset tagging
- If a school is filing multiple 471s, their Unmet Needs survey should list identical data on each 471
- Vendor quotes required despite not being mandatory on 471
  - Quote must include make and model or service type, quantity, unit cost, service dates
  - Signed contracts not required

### ECF Form 471 Do's/Don'ts

- If # of devices on FRN exceeds 471 survey #, explain in narrative
- Use default service delivery dates of 7/1/2021 6/30/2022
  - Detailed cost section will ask you to enter the # of months that service is being provided and doesn't automatically calculate using the calendar dates like the E-rate Form 471 does
- If you indicate that vendor will be seeking ECF reimbursement, you must upload proof from vendor that they've agreed to this
- If you get logged out before submitting, go to "My Pending Tasks" to see your draft application
  - As with the E-rate EPC portal, there's a very short timeout setting
- If you submit the form and realize you've made a mistake, there's a Modification feature to ask your PIA reviewer to make changes
- Form 471 Checklists (schools and libraries) available at: <a href="http://e-ratepa.org/?page\_id=32310">http://e-ratepa.org/?page\_id=32310</a>



### ECF Resources

- **ECF Form 471 Application** (in One
  - Portal): <a href="https://ecfportal.usac.org/suite/sites/ECF">https://ecfportal.usac.org/suite/sites/ECF</a>
- **USAC ECF Information Page:** <a href="https://www.emergencyconnectivityfund.org">www.emergencyconnectivityfund.org</a>
- **❖ USAC ECF Form 471 Guide:** <a href="https://www.emergencyconnectivityfund.org/ecf-fcc-form-471/">https://www.emergencyconnectivityfund.org/ecf-fcc-form-471/</a>
- USAC Training Modules: <a href="https://www.emergencyconnectivityfund.org/training/">https://www.emergencyconnectivityfund.org/training/</a>
- ❖ USAC ECF Customer Service Support Center: 1-800-234-9781 Monday – Friday 8 am − 8 pm Eastern Time
- ❖ FCC ECF Page: <a href="https://www.fcc.gov/emergency-connectivity-fund">https://www.fcc.gov/emergency-connectivity-fund</a>
- **FCC FAQ/Summary:** <a href="https://www.fcc.gov/emergency-connectivity-fund-faqs">https://www.fcc.gov/emergency-connectivity-fund-faqs</a>
- **❖ PA ECF Resource Page:** <a href="http://e-ratepa.org/?page\_id=32310">http://e-ratepa.org/?page\_id=32310</a>

# Questions?

