E-rate Training Workshop for Veteran PA Applicants



Presented by Julie Tritt Schell PA E-rate Coordinator for the Pennsylvania Department of Education October 2022 www.e-ratepa.org

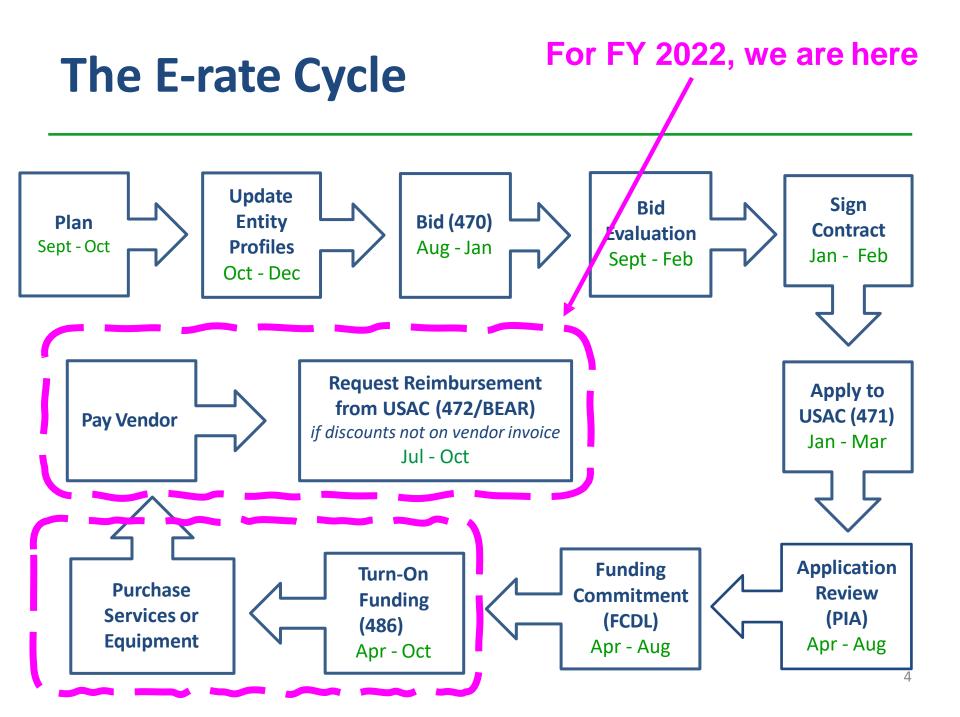
Lots to Cover!

- Wrapping Up FY 2021 & FY 2022
 - FY 2022 Form 486s Due
 - FY 2021 BEARs (Form 472 Reimbursement Form)
- BEAR Transition into EPC
- Updating EPC Account Administrators
- ECF Update
- EPC School Profile Updates (known as the "Admin Window")
- Category 2 Budgets and Where to Research Remaining C2 \$ for Your School/Library
- FY 2023 Anticipated Window Dates and Suggested Filing Timing
- Review of Revisions to Form 470
- PEPPM Bidding Delay for FY 2023
- Eligible Services for FY 2023
- Bidding Portal
- Deadline to Install FY 2021 Internal Connections



Finishing FY 2022 (July 1, 2022 – June 30, 2023)





Status of PA FY 2022 FCDLs

- 2263 FRNs submitted
 - \$61.7 million committed thus far
 - \$29.74 funded for Category 2
 - 41 FRNs still "pending" for 24 entities
 - Requesting about \$2.6 million
 - About 2/3 are for Category 2



- Compared to the same time last year, we are at about the same place
- Not seeing delays in processing post-commitment requests (SPIN changes, service substitutions, appeals)
 - If you've had a post-commitment or BEAR form pending more than 60 days, use Contact Us feature in EPC to request that it be escalated



FY 2022 Sources of Confusion

- FY 2022 Denials:
 - Only 11 FRNs denied = < .5%
 - \$84,000 denied
 - Denial reasons:
 - On red light status
 - Duplicate services
 - No 470 posted
 - Bid wrong category
 - Didn't bid correct category
 - Lack of detail on 470
 - Didn't reply to PIA request
 - Specified preference for self provisioned fiber in RFP
 - Ineligible equipment
 - If you have a question, please ask!



FY 2022 Form 486s

- If you have been funded for FY 2022, don't forget to file your Form 486 to "turn-on funding" and certify CIPA compliance
 - 66 PA entities still need to file
 - 486 Due List available at: <u>http://e-ratepa.org/wp-</u>
 <u>content/uploads/2014/03/Missing-486s-as-of-Oct-26-FY-2022.xlsx</u>
- For internal connections, file 486 now (don't wait)
- You must wait until you receive an FCDL to file the 486
- Deadline is 120 days after FCDL date or October 28, whichever is later
- VERY easy form to file in EPC (no data entry)
 - Guide at: <u>http://e-ratepa.org/?p=33182</u>
 - Be careful when clicking on CIPA certifications
 - These toggle instead of staying checked!



Reminder: Labeling & Equipment Transfer Rules

• Labeling

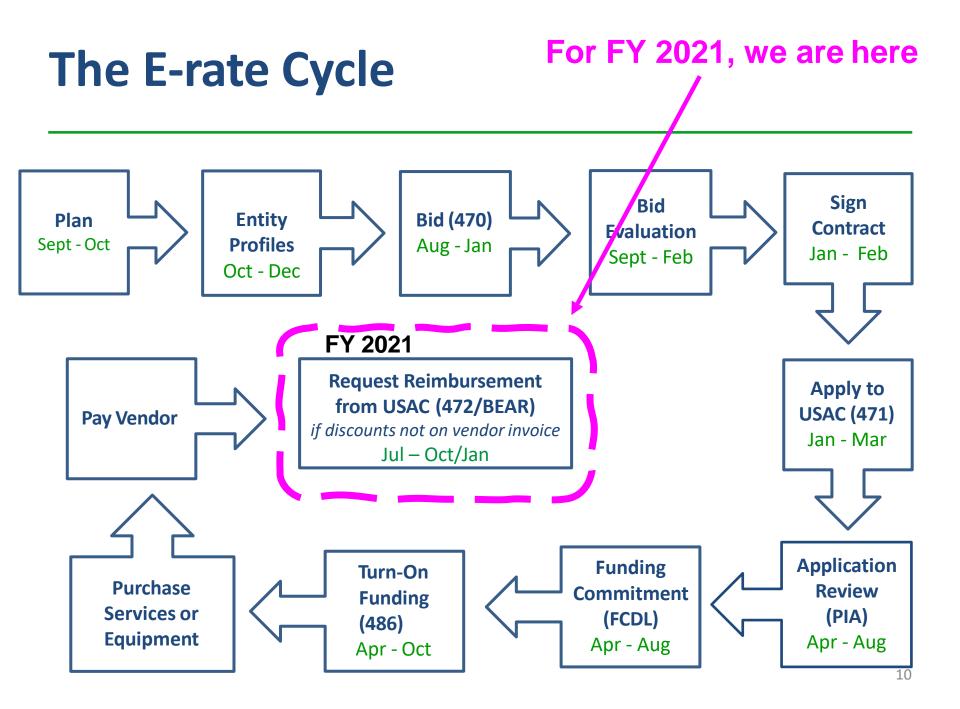
- When receiving equipment, be sure to label each piece and record in asset inventory
- Asset inventory must be kept retained for 10 years from date of purchase

• Eligible Equipment Transfers

- Beginning July 1, 2021, all equipment (funded in any funding year) may be transferred between buildings
 - If equipment is transferred between buildings within 5 years from date of purchase, must record reason and date of transfer and update asset inventory
 - No notice to USAC is required
 - Equipment may be disposed of, sold, transferred, etc. from 5 years from the date of installation
 - No notice to USAC required but asset inventory must be updated
 - → After 5 years, transfer equipment to a NIF

Finishing FY 2021 (July 1, 2021 – June 30, 2022)





BEAR Reimbursement Deadlines

- BEAR Form 472 Form that must be submitted within 120 days of last date to receive service or equipment
- For FY 2021 *recurring* services
 - October 28, 2022 is the invoicing deadline
 - Last date to receive service was June 30, 2022
 - C1 FRNs with imminent BEAR deadlines: <u>http://e-ratepa.org/wp-content/uploads/2014/03/FY-2021-BEARs-Due-as-of-Oct-26-2022-urgent.xlsx</u>
- For FY 2021 non-recurring purchases
 - Normally, the last date to receive/install equipment was September 30, 2022
 - (Jan 28, 2023 would have been BEAR deadline)
 - FCC granted a 1-year extension due to supply chain problems
 - Thus, the new BEAR deadline will be January 28, 2024

Requesting an Invoice Deadline Extension



- If you cannot make the BEAR deadline, OR if your BEAR was submitted but has not yet been paid, file for an Invoice Deadline Extension (IDER)
- IDERs <u>must</u> be requested by the invoice deadline (Oct. 28)
- Extension will be approved automatically for a single, 120-day extension
 - Cannot request a second extension
 - Approvals are shown on the screen and also will be e-mailed
- IDER Filing Guide at: <u>http://e-ratepa.org/wp-content/uploads/2014/03/IDER-Filing-Guide.pdf</u>



Must Have BEAR Credentials



- Each EPC User must have 'authorization' in EPC to file a BEAR
- How do you know if you have BEAR authorization?

 If you log-in to One Portal and <u>don't</u> see the BEAR option, you don't yet have authorization

and to contact customer service.

FCC Form 472 (BEAR) - Applicants file an FCC Form 472 (Billed Entity
Applicant Reimbursement (BEAR) Form) to request reimbursement from
USAC for the discount a mount of the eligible products or services that the
applicant has received and paid for in full.

Emergency Connectivity Fund (ECF) - Emergency Connectivity Fund participants use the ECF Portal to submit applications for reimbursement and review notifications regarding their program activities.

rate Productivity Center to manage program processes, receive notifications

- To gain authorization, simply complete the BEAR Access Template and submit to USAC
 - Template available at: <u>https://www.usac.org/e-rate/resources/forms/bear-form-access/</u>
 - Filing Guide: <u>http://e-ratepa.org/wp-content/uploads/2014/03/Form-472-</u> <u>BEAR-Access-Request-Guide-1.pdf</u>
 - Submit completed template in EPC using 'Contact Us' feature
 - BEAR authorization will be granted within a few days
 - Also request invoice deadline extension...

BEARs: Big Changes Coming!



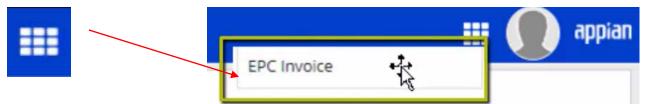
- Beginning mid-December (2022), USAC will migrate E-rate BEAR functionality into EPC!
 - The middle option into legacy BEAR system will go away

E-rate Productivity Center (EPC) - E-rate Program participants use the Erate Productivity Center to manage program processes, receive notifications, and to contact cultimer service.

FCC Form 472 (BEAR) - Applicants file an FCC Form 472 (Billed Entity Applicant Reimbursement (BEAR) Form) to request reimbursement from USAC for the discount amount of the eligible products or services that the applicant has received and paid for in full.

Emergency Connectivity Fund (ECF) - Emergency Connectivity Fund participants use the ECF Portal to submit applications for reimbursement and review notifications regarding their program activities.

• Instead, when you log into EPC, you will see this grid symbol in the upper right corner of the Landing Page which will take you to the new E-rate BEAR Portal

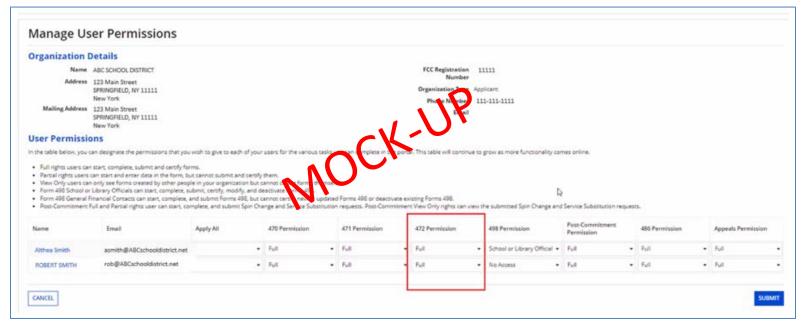


- For a brief tutorial of the new BEAR system, visit: <u>https://www.usac.org/e-rate/resources/e-rate-system-consolidation</u>
- You'll note it looks very similar to the ECF invoicing system

BEAR Permissions



- In the next few weeks, USAC will add a BEAR Form 472 Permission column to the EPC Users page
 - Page only visible to EPC Account Administrators (AA)
- USAC is *attempting* to migrate all existing BEAR authorized users so you can continue to file in new system
- If this isn't possible, or if someone isn't migrated, AA will have to manually provide authorization to EPC user(s) for their organization



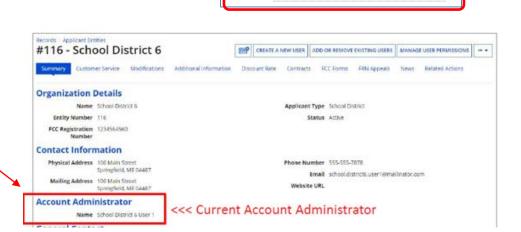
Time to Update Your AA's

Don't know who it is?

1) From your EPC Landing Page, click on your School or Library's Name under the USAC Logo

2) Summary page will show current Account Administrator

3) If AA is no longer accurate, call USAC at 888-203-8100 and they will work with you to modify the AA



My Landing Page

Training

Universal Service Administrative Co.

Welcome, PAS BEST SCHOOL DISTRICT - (PARENT ENTITY)!

Note: This is not a quick process, so allow 10-15 minutes when you make the call. Also, do this now before the other states begin to call



Emergency Connectivity Fund (ECF) Update



ECF Update

Funding Status:

- Total Requested (Windows 1, 2, 3) = \$182 million
- Total Committed (Windows 1, 2, 3) = \$105 million
- Total Disbursed = \$39 million
 - Out of \$56 million committed indicating BEAR invoicing method, only \$20 million has been disbursed
 - Could be that equipment/services not yet delivered
 - But... if you have received equipment and paid vendor, don't forget to file
 BEAR to obtain reimbursement
 - Status of all PA ECF FRNS: <u>http://e-ratepa.org/wp-</u> <u>content/uploads/2014/03/PA-ECF-All-Data-as-of-Oct-26-2022.xlsx</u>
- Don't forget to collect signed "unmet needs certifications" from parents/library patrons when equipment distributed
 - Certification examples available at: <u>http://e-ratepa.org/?p=33555</u>

ECF Pending Window 3 Applications

Pending Window 3 Applications:

- More than \$2.8 billion was requested nationwide in Window 3
 - Only \$1.5 billion available
- Funding prioritized using E-rate discounts (with preference to rural entities in each discount band)
- Currently, apps funded down to 85% discount level (80% + 5% for rural applicants)
 - This does not mean that you will only receive a percentage of your funding; it is simply a way for USAC to determine order of funding priority
- No final determination has been made where funding will be cut off, which is good news
 - Efforts underway to seek additional \$1 billion from Congress to fully fund Window 3 applications

How can you help?

- "Decommit" unneeded ECF funding commitments
- Follow these steps: Log into ECF Portal > My Forms and Requests > Click on the ECF 471 Application Number > Related Actions > Create a Post-Commitment Request.

ECF Invoicing

• Invoice Deadlines:

- ECF Windows 1 and 2 deadline is August 29, 2023
- ECF Window 3 deadline is February 29, 2024
- Form 472 BEAR Filing Guide is available at: <u>http://e-ratepa.org/wp-content/uploads/2020/03/ECF-Form-472-BEAR-Reimbursement-Filing-Guide-updated-June-2022.pdf</u>.
- Why does it take so long for BEARs or SPIs to be processed?
 - Most BEARs and SPIs are not complete
 - USAC must review, then FCC, then sent to US Treasury for payment
- Don't forget:
 - You must upload both the vendor invoice AND proof of delivery or shipping with BEAR or SPI
 - For equipment invoices, vendor invoice must contain make/model, unit cost and quantity
 - Your SAM.gov account must be active and up to date
 - SAM.gov contact receives notice when funds are transferred



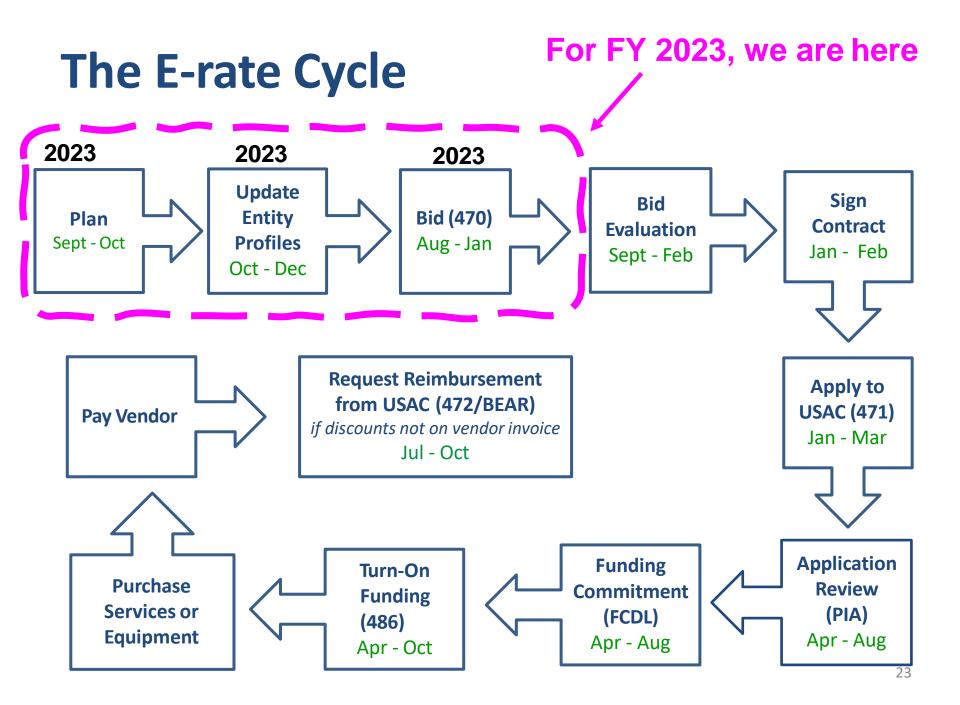
ECF – Making Changes

- Many applicants are seeking to make changes to approved ECF application
 - Equipment make/model
 - SPIN changes
 - Invoicing mode changes
- Submit Post Commitment Request (PCR)
- Log into ECF Portal > My Forms and Requests > Click on the ECF 471 Application Number > Related Actions > Create a Post-Commitment Request
- Normally takes ~30 days to obtain the approval
 - If a post-commitment request has been pending > 30 days, call USAC's ECF Customer Service Center (CSC) at (800) 234-9781 Monday – Friday from 8 a.m. to 8 p.m. ET, or submit a case in their ECF Portal, and ask for your PCR to be escalated



Let's Shift to Funding Year 2023...





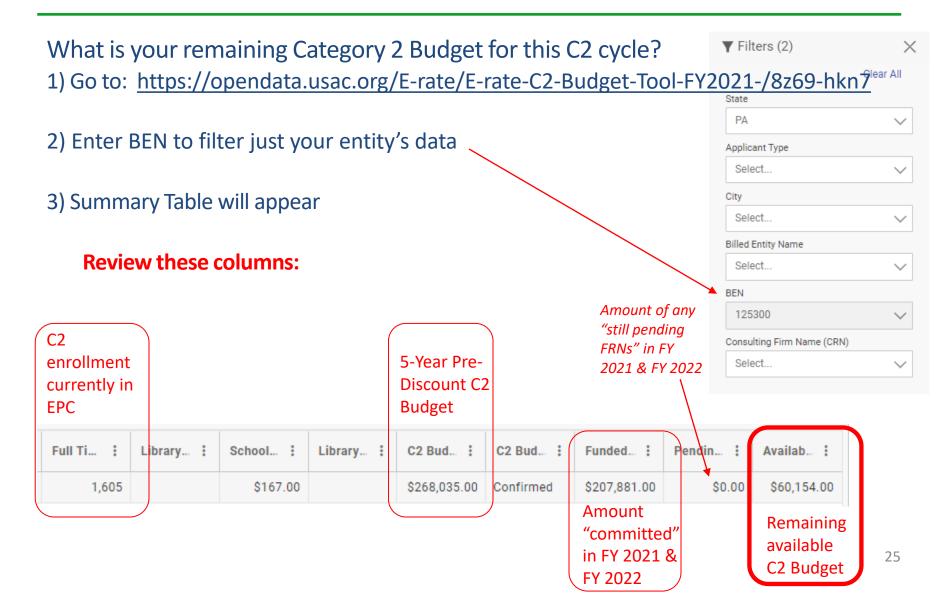
FY 2023 "Admin Window"

- Admin Window is 2-3 months *before* the Form 471 window when schools and libraries update their school or library profiles in EPC portal
 - Open now. Usually closes 2 days before Form 471 filing window opens in January
 - This data is then ported over into the Form 471
- Mainly used to update:
 - E-rate Discounts: Must update school profiles with current enrollment/NSLP data to calculate E-rate discounts for upcoming year
 - Julie will obtain October 2022 enrollment/NSLP/CEP data from PDE in mid-December and send to listserve



- Most schools wait until then to update EPC profiles
- **Category 2 Budgets**: Update enrollment (schools) and square footage changes (libraries) but ONLY if it will increase Category 2 budget
 - Category 2 enrollment data can be <u>different</u> from annual discount-rate enrollment data
 - Doesn't have to be updated each year
 - C2 enrollment data entered in separate location in EPC
 - >>> EPC Landing Page > District Name > Manage Organization > Scroll to bottom of page

Calculating Remaining C2 Budgets



FY 2023: What's New

- PEPPM mini-bids cannot be issued until at least January 2
 - PEPPM contract is currently being rebid and new vendor contracts will not be valid until January 2
 - Many awarded vendors may be changing, so be sure to wait for new list/instructions to come to the listserve
- FY 2023 Eligible Services List not yet approved by FCC
 - Wi-Fi on buses not likely to become eligible
 - Cyber-security? Stay tuned
- Bidding Portal? Not yet!
 - Proposed: Vendors submit all bids in EPC (not to applicants), all vendor communications must be done in EPC, bid evaluation must be uploaded to USAC
 - Has not yet been adopted by FCC
 - Something is likely coming for FY 2024
 - Be sure to have bid evaluation matrix for all E-rate procurements

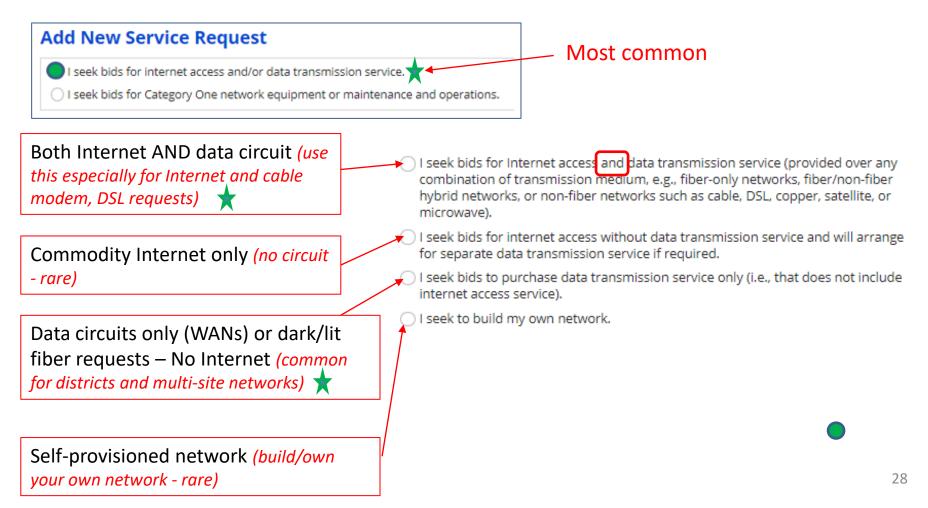
Random Topics/Reminders

- FY 2023 Rebid List Coming Next Week
- Contract Extension Reminder: If your current contract includes a specific # of voluntary extensions, and you want to exercise one of those extensions, you are not required to post a new Form 470 to use one of the extensions
 - BUT... you <u>must</u> have written documentation to the vendor notifying them that you are electing to extend your contract, pursuant to one of the extension terms in your original contract
- If you issue any changes or clarifications to your RFP (including posting answers to vendor questions), you must extend the bid due date by another 28 days
 - This is why it's best to start early
 - Build in a vendor question due date to your RFP timeline!
 - No Changes to Form 470, but big changes in FY 2020...



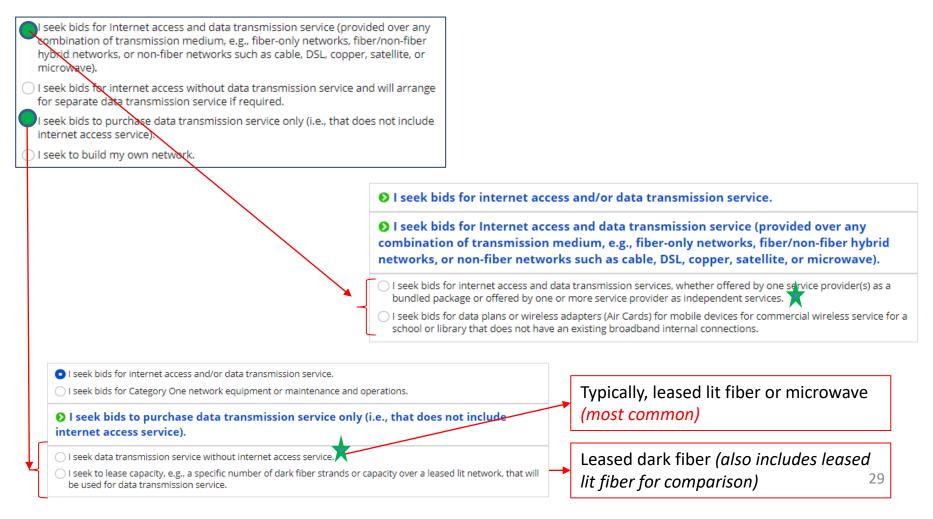
Last Year's Form 470 Changes

• FCC revamped Form 470 in attempt to remove "gotchas"



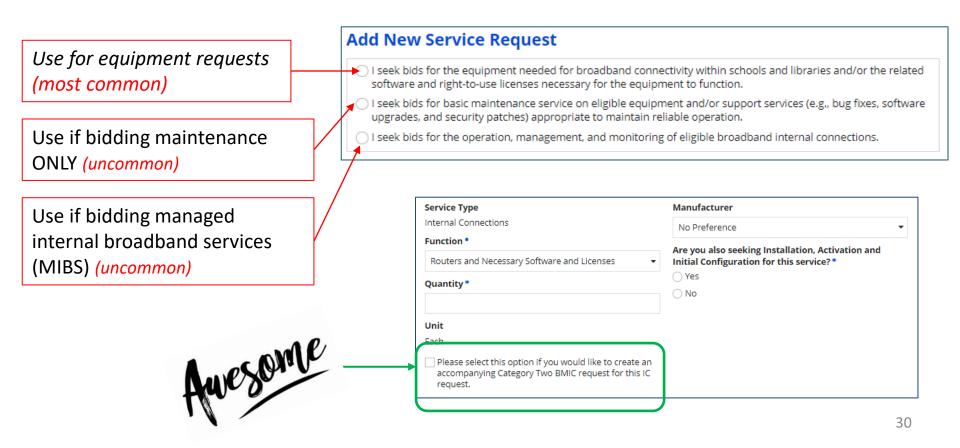
Last Year's Form 470 Changes

• 1st or 3rd Options have additional radial options:



Last Year's Form 470 Changes

- Basic maintenance an "add on" option to equipment request
- Licenses/software included with equipment request



FY 2023 Application Timeline

- <u>Recommended timeline:</u>
 - NOVEMBER: File all Form 470s by Thanksgiving
 - except PEPPM mini-bids
 - DECEMBER: Vendor bids submitted
 - MID-DECEMBER: Update EPC profiles after Julie sends updated data
 - JANUARY: Bid evaluation, board agenda submission
 - FEBRUARY: School board approval, sign contracts
 - FEBRUARY/MARCH: File Form 471
- Form 470s being accepted in EPC NOW
 - Don't wait until January to file 470s



FY 2023 Questions to Ask Yourself

- Is a Form 470 Needed for FY 2023?
 - Category 1: Review existing contracts to determine when they expire
 - Extend, if desired and if options available
 - If contract expiring, decide if additional bandwidth is needed
 - Review Julie's Category 1 bidding list
 - Category 2: Determine what equipment/wiring is needed for each school over next 12 months
 - Research options, prepare bid-list
- If bidding is needed, what will be my bidding dates?
- What date(s) will I obtain board approval?
 - What is the deadline to add items to the board agenda?
 - Be sure board meeting date is before Form 471 due date which is likely to be mid-March
- Should I update enrollment for C2 to increase budget?

Create a detailed timeline, mark it on your calendar, and follow your plan!

Where to Go For E-rate Help

- E-rate: USAC's Client Service Bureau (CSB)
 - E-rate "Help Desk" where applicant & service providers can get answers to questions
 - Call 888-203-8100
 - Submit a 'Customer Service Case' in EPC
- ECF: USAC's Customer Service Center (CSC)
 - Call 800-234-9781
 - Use "Contact Us" in EPC
- PA E-rate Coordinator
 - E-mail jtschell@comcast.net
 - Attend webinars!
 - Read listserve messages!
 - <u>www.e-ratepa.org</u>
 - Helpful Documents: <u>http://e-ratepa.org/?page_id=754</u>
 - Training: <u>http://e-ratepa.org/?page_id=745</u>
 - ECF Resources: <u>http://e-ratepa.org/?page_id=32310</u>



Questions?

