E-rate Training Workshop for Veteran PA Applicants

Link to Presentation: http://e-ratepa.org/wp-content/uploads/2014/03/FY-2024-Veterans-Presentation-Oct-2023.pdf



Presented by Julie Tritt Schell
PA E-rate Coordinator
for the Pennsylvania Department of Education
October 2023

www.e-ratepa.org

Lots to Cover!

- Wrapping Up FY 2022 & FY 2023
 - FY 2023 Form 486s Due
 - FY 2022 BEARs (Form 472 Reimbursement Form)
 - Windows 1 and 2 ECF BEAR Deadline
- BEAR Transition into EPC
- Library Bidding Exemption
- 10% Internet Hold Harmless
- Updating EPC Account Administrators
- EPC School Profile Updates (known as the "Admin Window")
- Category 2 Budgets and Where to Research Remaining C2 \$
 for Your School/Library
- FY 2024 Anticipated Window Dates and Suggested Filing Timing
- PEPPM Mini-Bid Process and Updates
- Eligible Services for FY 2024
- Looking Forward Learning Without Limits



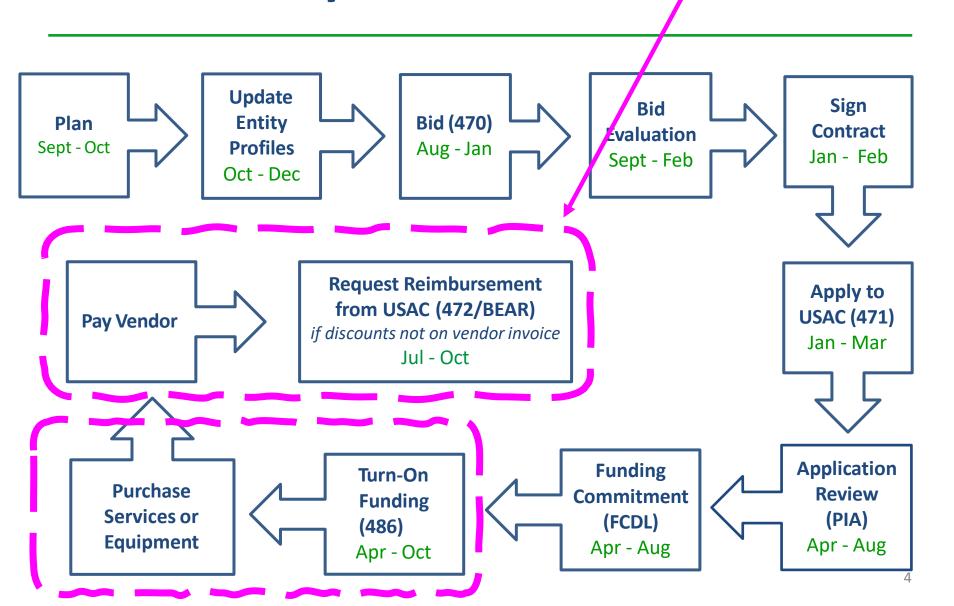
Finishing FY 2023

(July 1, 2023 – June 30, 2024)



The E-rate Cycle

For FY 2023, we are here



Status of PA FY 2023 FCDLs

2136 FRNs submitted

substitutions, appeals)

- \$58.7 million committed thus far
 - \$27.3 funded for Category 2
- 107 FRNs still "pending" for 42 entities
 - Requesting about \$4.1 million
 - About 1/3 are for Category 2
 - 12 FRNs Awaiting Heightened Scrutiny
- Reach out to Julie if no PIA contact in last 3 weeks Not seeing delays in processing post-commitment requests (SPIN changes, service
 - 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 2023 Sources of Confusion

- FY 2023 Denials:
 - Only 20 FRNs denied
 - \$467,000 denied (high \$ due to red light and 1 large fiber RN)
 - Denial reasons:
 - On red light status (9)
 - Duplicate services
 - No 470 posted
 - Didn't bid correct category
 - Didn't respond to PIA request
 - Didn't bid leased dark fiber/self-provisioned fiber correctly on Form 470
 - If you are seeking leased dark fiber or self-provisioned fiber, please let me know and I can help
 - Ineligible equipment
 - If you have a question, please ask!



FY 2023 Form 486s

- If you have been funded for FY 2023, don't forget to file your Form 486 to "turn-on funding" and certify CIPA compliance
 - 71 PA entities still need to file
 - 486 Due List (as of 10/19) available at: http://e-ratepa.org/?p=35062
 - 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 30, whichever is later
 - Normally Oct 28
- VERY easy form to file in EPC (no data entry)
 - Guide at: http://e-ratepa.org/?p=35062
 - Be careful when clicking on CIPA certifications
 - These toggle instead of staying checked!
- If you ever file Form 486 late and USAC modifies your Service Start Date, hence reducing your E-rate commitment, let me know as soon as you file the late Form 486
 - I can help you appeal to restore your \$!



Reminder: Labeling & Equipment Transfer Rules

Labeling

- When receiving equipment, be sure to label each piece and record in asset inventory
 - Make/model/serial number/building/room/FRN/date installed
- Update when equipment moved or taken out of service
- Asset inventory must be kept retained for 10 years from date of purchase
 - Sample: http://e-ratepa.org/wp-content/uploads/2014/03/Asset-Register-Sample.xlsx

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

E-rate Audits

3 Types of E-rate Audits

- 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 from certain "window"
 - But higher \$ disbursements are more heavily weighted in random selection
 - Requires nearly all same documentation to be submitted as larger BCAP audit but for an FRN, not all FRNs in a funding year
 - ~ 350 PQAs each year
 - Used to determine 'Improper Payment Rate' for entire E-rate program
- BCAP Audit
 - Large audit of all FRNs in a funding year
 - http://e-ratepa.org/wp-content/uploads/2014/03/Beneficiary-Initial-Request-List.xlsx

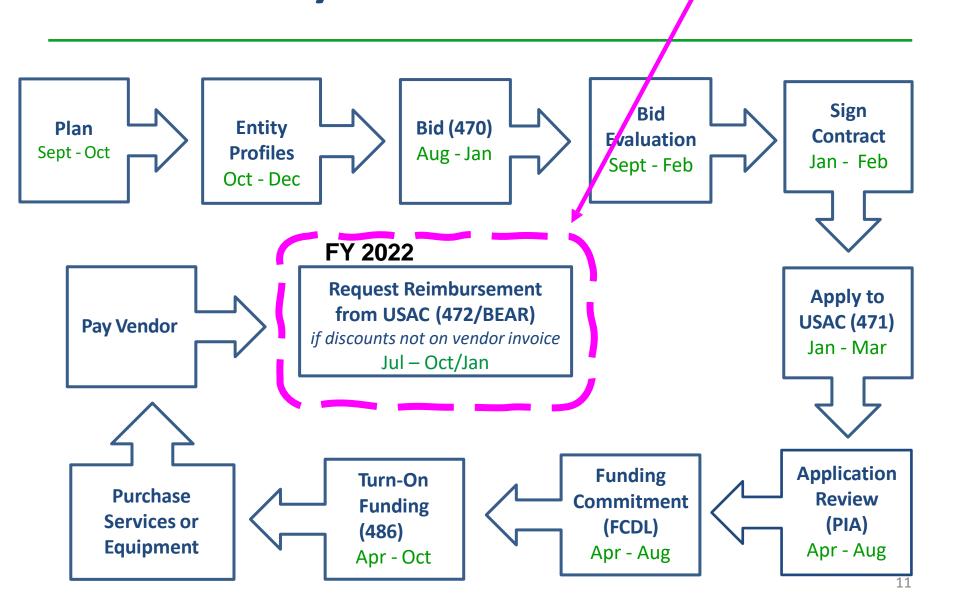
Finishing FY 2022

(July 1, 2022 – June 30, 2023)



The E-rate Cycle

For FY 2022, we are here



BEAR Reimbursement Deadlines

- BEAR Form 472 Form that must be submitted within 120 days of last date to receive service or equipment
- For FY 2022 recurring services
 - October 30, 2023 is the invoicing deadline
 - Last date to receive service was June 30, 2023
 - C1 FRNs with *imminent* BEAR deadlines: http://e-ratepa.org/?p=35041
- For FY 2022 non-recurring purchases
 - September 30, 2023 was last date to receive/install equipment
 - Jan 28, 2024 is BEAR deadline
- For FY 2021 non-recurring purchases
 - Because FCC granted a 1-year extension due to supply chain problems, many FY
 2021 FRNs have BEAR deadline of January 28, 2024
 - In PA: 202 FRNs, \$12.2 million at stake
 - http://e-ratepa.org/wp-content/uploads/2014/03/FY-2021-BEAR-Deadlines-Jan-2024.xlsx

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. 30)
- 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
- Invoice Deadline Extension Request Filing Guide at:
 http://e-ratepa.org/wp-content/uploads/2014/03/IDER-Filing-Guide.pdf



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



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

Emergency Connectivity Fund (ECF) Update



ECF Update

Funding Status:

- Total Committed (Windows 1, 2, 3) = \$124 million
 - \$ Available to fund all submitted applications
- Total Disbursed as of 10/22/2023 = \$73 million
 - Out of \$82 million committed in Windows 1 and 2 (FY 2021), \$53 million has been disbursed.
 - Out of \$46 million committed indicating BEAR invoicing method, only \$30 million has been disbursed
 - Could be that equipment/services never used
 - But... if you have received equipment and paid vendor, don't forget to file
 ECF BEAR to obtain reimbursement
 - FY 2021 BEAR FRNs with No Disbursement: http://e-ratepa.org/?p=35048
 - Status of all ECF FRNs: http://e-ratepa.org/wp-content/uploads/2014/03/ECF-PA-All-windows-as-of-Oct-22-2023.xlsx
- Don't forget to collect signed "unmet needs certifications" from parents/library patrons when equipment distributed
 - Certification examples available at: http://e-ratepa.org/?p=33555

ECF Invoicing

- BEAR Invoice Deadlines:
 - ECF Windows 1 and 2 deadline is October 30, 2023
 - ECF Window 3 deadline is August 29, 2024
 - ECF Form 472 BEAR Filing Guide is available at: http://e-ratepa.org/wp-content/uploads/2020/03/ECF-Invoicing-Aug-2023.pdf
- If your ECF BEAR reimbursement is denied or reduced after the October 30 deadline, you have 30 calendar days from the date of your BEAR invoice decision to appeal to USAC.
 - If appeal is approved, you will have 60 days from the appeal approval decision to resubmit your ECF reimbursement request.
 - Note: You cannot appeal to USAC if you miss the October 30 deadline.

ECF Invoicing - Reminders

Don't forget:

- You must upload with BEAR both the vendor invoice AND:
 - 1. Proof of delivery or shipping for equipment
 - For equipment invoices, vendor invoice must contain make/model, unit cost and quantity
 - 2. Proof of service delivery dates for services
- Your SAM.gov account must be active and up to date
 - SAM.gov contact receives notice when funds are transferred



ECF – Asset Inventory Reminder

Required Elements of Equipment Asset Inventories

- 1) the device or equipment type (i.e., laptop, tablet, mobile hotspot, modem, router);
- 2) the device or equipment make/model;
- 3) the device or equipment serial number;
- 4) the full name of the person to whom the device or other piece of equipment was provided;&
- 5) the dates the device or other piece of equipment was distributed (or loaned out) and returned, or the date the school or library was notified that the device or other piece of equipment was missing, lost, or damaged.

Required Elements of Service Inventories

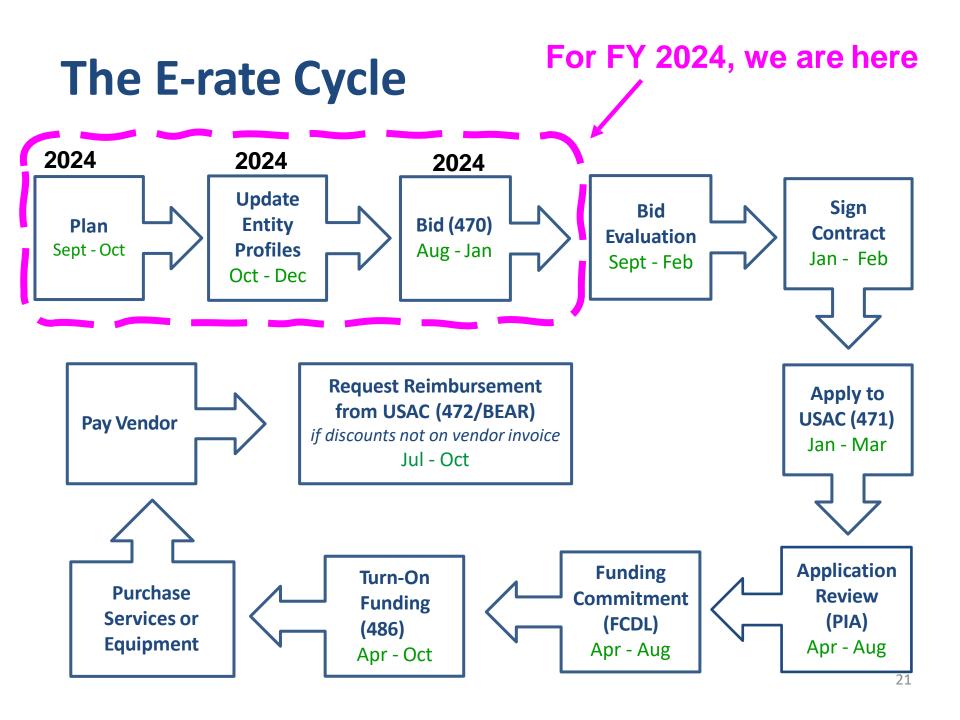
- 1) type of service provided (i.e., DSL, cable, fiber, fixed wireless, satellite, mobile wireless);
- 2) broadband plan details, including: upload and download speeds and monthly data cap;
- 3) the name(s) of the person(s) to whom the service was provided;
- 4) the service address (for fixed broadband service only); and
- 5) the installation date of service (for fixed broadband service only); and
- 6) the last date of service, as applicable, (for fixed broadband service only).



http://e-ratepa.org/wp-content/uploads/2020/03/Asset-Inventory-Spreadsheet-Example1.xlsx

Let's Shift to Funding Year 2024...

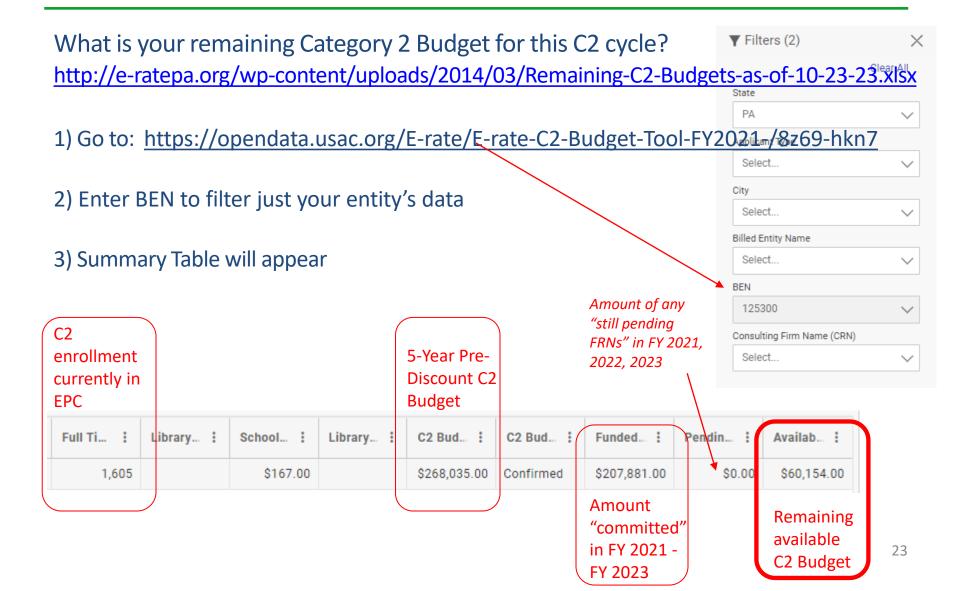




FY 2024 "Admin Window"

- Admin Window is 2-3 months <u>before</u> the Form 471 window when schools and libraries update their school or library profiles in EPC portal
 - Opens October 24. 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 2023 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 2024: What's New

School Bus Wi-Fi!

- Approved by FCC, but no details yet; FCC Public Notice coming soon
- Unanswered questions bidding, bus leasing, entity numbers for buses, other rules unclear
- Form 470 and 471 likely to change

Rural Urban Updates from 2020 US Census

- USAC has just updated the U/R status in EPC profiles to reflect the updated status using the 2020
 US Census
- ~ 200 entities' discounts decreased and ~ 300 entities' discounts increased
 - If you were impacted, you would have received an e-mail notification from USAC

PEPPM mini-bid reminder

- Can issue mini-bid solicitations to vendors now
- Same Form 470 #, BUT
- Always use updated vendor list: http://e-ratepa.org/?page_id=6121
 - Vendor contacts and authorized resellers change frequently
 - Keep downloaded list for document retention
- BEAR Migration into EPC Nov 7



FY 2024: E-rate Simplification

FCC Tribal Order Approved – July 2023:

- 10% Internet Access Hold Harmless
 - Up to 10% can be used for ineligible purposes
 - Important for CTCs that provide adult ed classes
 - Other usage during school day



- Beginning in FY 2024, libraries are exempt from bidding Category 2 equipment or services if:
 - Total, pre-discount amount is \$3,600 or less
 - Total cost is per library and cannot be averaged over multiple libraries
 - Cost-effective rules still apply
 - Contracts still must be signed prior to filing the Form 471



FCC – Further E-rate Simplification?

FCC seeking comments on further streamlining measures (FNPRM):

- Multiple internet providers
- Mid-year bandwidth increases
- Multi-year discount validations
- Basic maintenance simplification
- Eliminating Form 486
- Cardinal changes
- Transition of services
- Wiring between buildings
- Transition of broadband services mid-year
- State E-rate Coordinators' Alliance (SECA) Comments/Reply Comments:

Initial: https://www.fcc.gov/ecfs/document/109260133305397/1

Reply: https://www.fcc.gov/ecfs/search/search-filings/filing/10231601816082

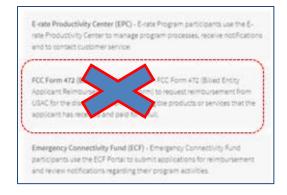
E-rate Looking Glass...

- Learning Without Limits Initiative
 - Just proposals for now, may be voted at Nov meeting
 - 3-year, \$200 million Cybersecurity Pilot (not in E-rate)
 - Hotspot Lending Program in E-rate (similar to ECF)
- Bidding Portal? Not yet!
- All E-rate payments via SAM.gov
 - Effective no earlier than end of 2024
 - E-rate reimbursements will not go to bank account on Form 498
 - Form 498 will require UEI number which will link it to SAM.gov account
 - Form 498 already collecting UEI if you update or create one new
 - SAM.gov requires annual renewal

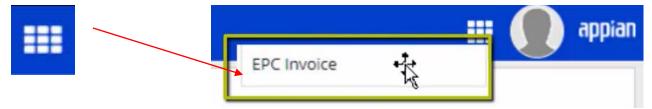
BEARs: Big Changes Coming!



- Beginning November 7, 2023, USAC will migrate E-rate BEAR functionality into EPC!
 - The middle option into legacy BEAR system will go away



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



- For a tutorial of the new BEAR system, visit: https://www.usac.org/e-rate/applicant-process/invoicing/how-to-file-fcc-form-472-in-epc/
- You'll note it looks almost identical to the ECF invoicing system

What Will Change?



- Only AA can grant BEAR Access Permission
- Tabs for Submitted Forms, Pending Tasks, Pending Inquiries
- Can enter multiple FRNs and multiple SPINs on the same BEAR
 - I don't recommend multiple FRNs on same BEAR to keep disbursements small and for better payment tracking
- Ability to upload vendor invoices with BEAR
 - Not required, but because USAC often requests these during invoicing review, it's a good idea to upload to save you time later (C2, mainly) and to have a record of it in the EPC system
- Real-time status reports by FRN Line Item:
 - Incomplete, Certified, Processed, Cancelled
- Ability to see date BEAR was paid
- Better invoicing decision explanations
- Error checks
- All invoicing outreach and communications will be conducted through the portal (same as PIA reviews)
- Note: Old BEAR data was not ported into new system
 - Can contact CSC for copies of old BEARs, if needed

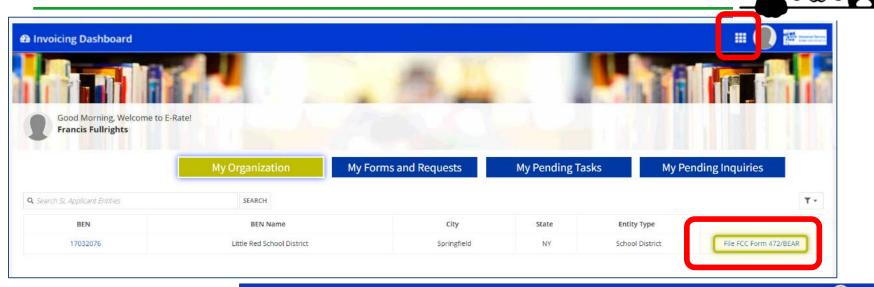
Invoicing Communications

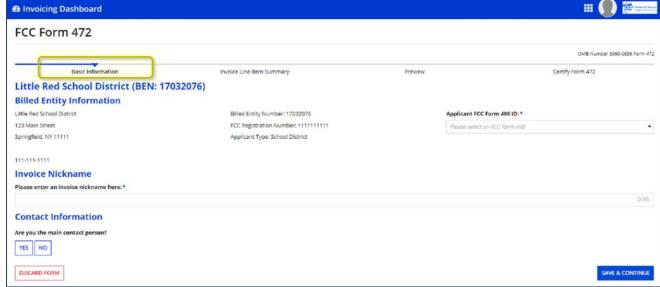


Who Gets What...

Notification Type	Description	Generated	Method of Delivery
Invoice Pending Certification	Notification that an invoice requires certification by a Full Rights user	A Partial Rights user creates an invoice and sends it to a Full Rights user to certify	 Create FCC Form 472/474 task in My Pending Tasks tab assigned to Full Rights users Email alert to Full Rights user that a new task has been assigned
Information Request Received from USAC for an Invoice Line	Notification that an invoice line has an inquiry form USAC that requires a response	A USAC reviewer sends new communication regarding an invoice line	 Email to Partial and Full Rights users with invoice permissions for the BEN/SPIN Invoice Line Number listed for Full Rights users in My Pending Inquiries tab
Deadline Extended for Response to Information Request	Notification that additional time has been granted to respond to an inquiry for an invoice line	A USAC reviewer updates the response due date for an invoice line that was granted an extension	Email to Partial and Full Rights users with invoice permissions for the BEN/SPIN Invoice Line Number listed for Full Rights users in My Pending Inquiries tab
BEAR Notification Letter* (Applicant)	A letter notifying users that an invoice line or lines submitted using the BEAR mode have been processed	After each payment file batch is run, typically at the end of every Monday and Thursday	Email to all users with invoice permissions for the BEN News post visible to all users with invoice permissions for the BEN
BEAR Remittance Statement* (Applicant)	A letter notifying users of the amount approved for payment for a processed invoice line or lines	After each payment file batch is run, typically at the end of every Monday and Thursday	Email to General Financial Contact listed on FCC Form 498 News post visible to General Financial Contact on FCC Form 498
Applicant QDR* (Applicant)	A quarterly summary of disbursement activity for a particular BEN number for invoice lines submitted using both the BEAR and SPI mode	At the end of every quarter (Jan, Apr, Jul, and Aug) if the BEN has invoicing activity that quarter	Email to all users with invoice permissions for the BEN News post visible to all users with invoice permissions for the BEN
Invoice Status Report (Service Provider)	A report of the validation status of all certified invoice lines associated with the SPIN number that have been through invoice data validation	After each payment file batch is run, typically at the end of every Monday and Thursday	Email to all users with invoice permissions for the SPIN
SPI Remittance Statement** (Service Provider)	A letter notifying users of the amount approved for payment for a processed invoice line or lines	After each payment file batch is run, typically at the end of every Monday and Thursday	Email to Remittance Statement Contact listed on FCC Form 498 Visible in the E-File Portal to Remittance Statement Contact on FCC Form 498
ESPI Upload Ready for Review (Service Provider)	Notification that the validation results for an ESPI file upload are ready to be reviewed by a Full Rights user	The automated file format validation process for an ESPI file upload is complete in EPC	 Email to the Full Rights users who uploaded the ESPI file Review ESPI Upload Result task in My Pending Tasks tab assigned to the Full Rights user

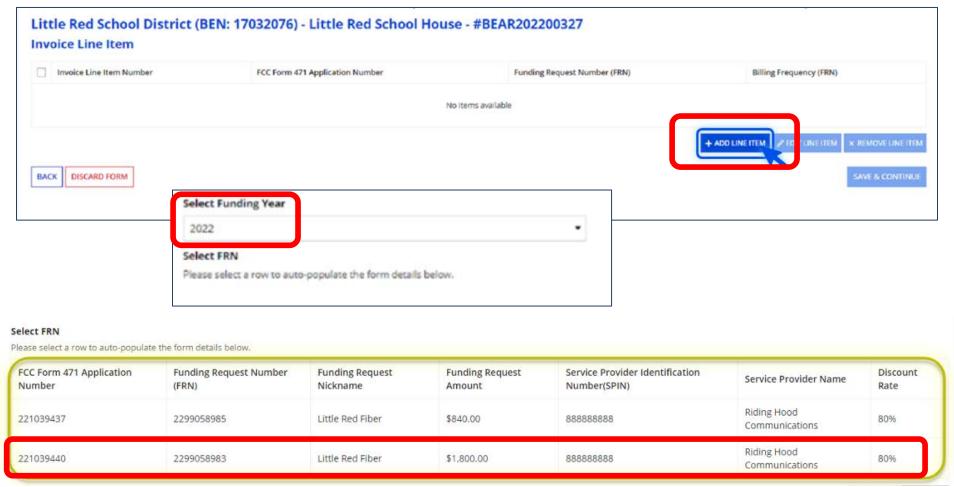
Preview of New BEAR





Preview of New BEAR

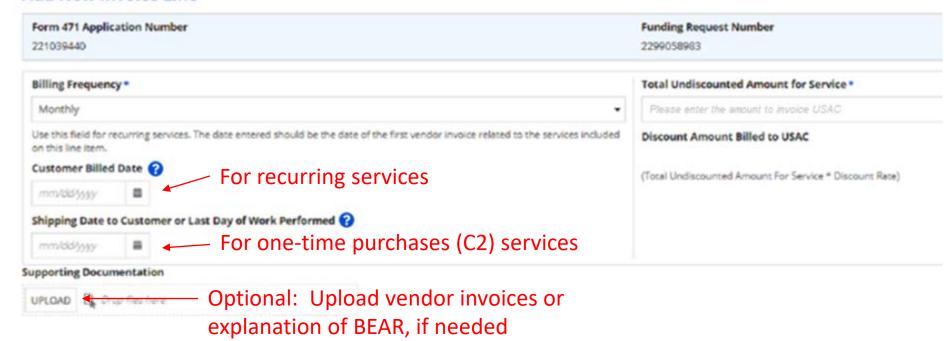




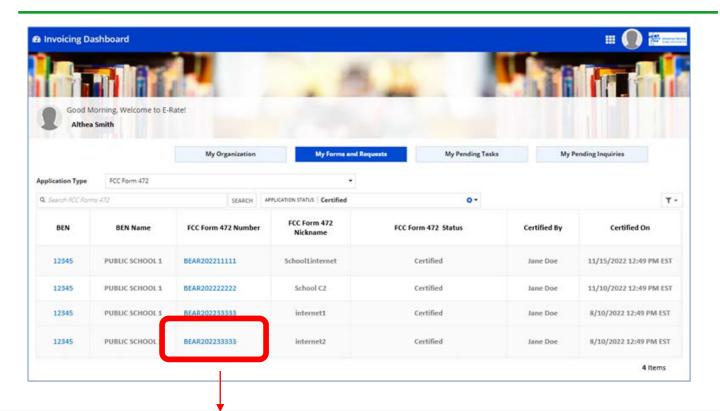
Preview of New BEAR



Add New Invoice Line



Preview of Invoicing Dashboar

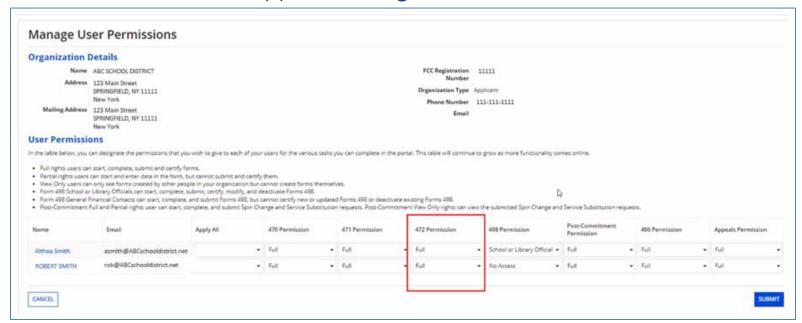


ce Line Items				
Invoice Line Item 1	Funding Request Number	Discount Amount Billed to USAC	Invoice Line Status	
20000541	2299058985	\$18.40	Certified	
20000542	2299058983	\$16.80	Certified	

BEAR Permissions



- Will no longer request BEAR Access from USAC
- There is now a BEAR Form 472 Permission column on the EPC Users page
 - Page only visible to EPC Account Administrators (AA)
- USAC has (attempted to) migrate all existing BEAR authorized users so you can continue to file in new system
- If a user wasn't migrated or is a new user, EPC AA will have to manually provide authorization to EPC user(s) for their organization



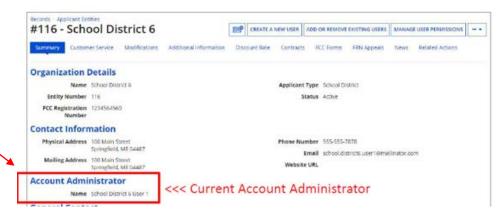
Time to Update Your AA's

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



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

Random Topics/Reminders

- FY 2024 Category 1 Rebid List coming to listserve this week
 - http://e-ratepa.org/wp-content/uploads/2014/03/FY-2024-C1-Rebid-Status-V2.xlsx
- 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 and then add 2 weeks to your bid due date (for a total of about 6.5 weeks total)
- May be changes to Form 470 to include school-bus Wi-Fi
- Reminder: Big changes were made to C1 Form 470 in FY 2020...
 - Guide: http://e-ratepa.org/wp-content/uploads/2014/03/Category-1-Form-470-Filing-Guide-FY-2023.pdf

FY 2024 Application Timeline

- Recommended timeline:
 - November: File all Form 470s by Thanksgiving
 - End of 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 2024 Questions to Ask Yourself

- Is a Form 470 Needed for FY 2024?
 - 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 <u>Category 1 bidding list</u>
 - Category 2: Determine what equipment is needed for each school or library over next 12 months
 - Research options, prepare bid-list
- If bidding is needed, what will be my bidding dates?
 - For C2, will I use the Form 470 or PEPPM mini-bid?
- 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!
 - www.e-ratepa.org
 - Helpful Documents: http://e-ratepa.org/?page_id=754
 - Training: http://e-ratepa.org/?page_id=745
 - ECF Resources: http://e-ratepa.org/?page_id=32310



Questions?

