Program Integrity Assurance Review (PIA)

After the applicant files and certifies an FCC Form 471 within the filing window, Program Integrity Assurance (PIA) reviewers at USAC check the information on each Form 471 for completeness and accuracy and may have additional questions for the applicant to answer.

All applications go through an initial review and a final review, which may involve questions from PIA reviewers on one or more of the following topics:

- Eligibility of the entities receiving service
- Eligibility of the services requested
- Discount calculations
- Contracts
- The competitive bidding process
- Response, Additional Reviews, and Follow-Up

PIA in EPC
Beginning in FY 2016 and continuing into FY 2017, all PIA questions and answers will be posted in EPC. Please refer to the attached slides that walk through the PIA process in EPC. In brief:

- The 471 main contact will receive an email notification that a PIA reviewer has questions about their application.
- The email will list the 471 # and the general subject of the inquiry (e.g. Eligibility of Services or Discount Rate), but will not contain the actual PIA question.
- Click on the link in the email to see/respond to the PIA questions
- If you see more than one inquiry in the PIA list, respond to all of them at the same time – not one by one
- All submitted inquiries remain in EPC

Response, Additional Reviews, and Follow-Up
The applicant will be given 15 days to respond to PIA questions. You can ask for more time if you need it, but keep in mind that this will add more time to the review process. PIA reviewers typically have authority to grant one 1-week extension of time but further extension requests must be approved by supervisors and must be supported by a reasonable explanation of extenuating circumstances. Extensions need to be requested inside EPC in the "Review Inquiries" module.

Some applications undergo additional review - Selective Review is one example - where PIA may request more detailed responses that can include:

- Documentation of the competitive bidding and service provider selection processes;
- Documentation of the applicant's ability to pay the non-discount share (the portion of the cost of eligible products and services not reimbursed by USAC); and
- Proof that the applicant has obtained necessary resources - e.g., hardware, software, staff training, electrical capacity, retrofitting - that are not eligible for Schools and Libraries Program discounts but that must be in place to make effective use of the discounted services.

As part of the review process, PIA may be required to change the category of service or the service type on a Funding Request Number (FRN). If PIA discovers that there are ineligible services in a funding request, the applicant will be able to remove them or move them to a separate request to avoid denial under the 30% Rule.

After the PIA review process has been completed, USAC issues a Funding Commitment Decision Letter (FCDL) containing USAC's decisions on your funding requests. The applicant can find this decision in the News Feed in the organization's EPC account. The applicant should review this decision carefully, as it contains important information both for planning the start of the receipt of services and for completing the additional steps in the application process. If the applicant disagrees with one or more of the decisions in your FCDL, an appeal may be submitted to USAC.

E-rate Program Integrity Assurance Review (PIA) Guide FY 2017
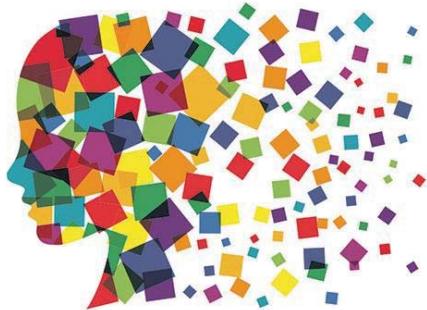
FY 2017 PIA Review Overview

- All PIA questions and answers will be posted and submitted in applicants' EPC portals
- The 471 main contact will receive an email notification that a PIA reviewer has questions about their application
  - The e-mail will list the 471 # and the general subject of the inquiry (e.g. Eligibility of Services or Discount Rate), but will <u>not</u> contain the actual PIA questions
- Click on the link to see/respond to the PIA questions
- If you see more than one inquiry in the PIA list, respond to all of them at the same time – not one by one
- All submitted inquiries remain in EPC

PIA E-mail Notifications

EXAMPLE OF PIA INFORMATION REQUEST EMAIL

Today's Date: 6/24/2016
Response Due Date: 7/11/2016
Contact Name: XXXXX
Applicant Name: XXXX AREA SCH DISTRICT
FCC Form 471 Application Number: 1610074XX

Dear Applicant:

We are in the process of reviewing your Funding Year 2016 FCC Form 471 application(s) and we need additional information to complete our review. Please respond to the information requests below. Please note that EPC allows you to begin working on your answers and save your work for later by clicking "Save and Close." We advise you to provide responses to all of the questions before submitting your answers. Click "Submit" only when you have answered all the questions in their entirety.

- Eligibility of Products and Services

Click here to respond to inquiries

USAC Homepage

If you have any questions as you work through your responses to the PIA review inquiries, please feel free to contact me via the phone number or e-mail address provided below. Please do not use e-mail to submit your responses to the PIA review inquiries. USAC will not review responses to PIA review inquiries sent to the reviewer's email address. All PIA responses must be submitted in EPC. Again, please be sure to provide complete responses to all of the PIA questions. If you need additional time to prepare your response, you may request an extension. Click the "Request Extension" button, located at the top of the "Review Inquiries" page in EPC. Your first extension request will be automatically granted, and you will receive an additional seven days to respond. Be sure to meet the response due date and provide all of the information requested, otherwise your application(s) may receive reduced funding or a funding denial.

PIA Reviewer's Name/Contact Information

> Click this link to go directly to the PIA inquiry. Be sure to log into EPC!

3

PIA Inquiry Page

> 1) Click "Respond to Inquiries" which will then turn the Inquiry Name the color blue and make it an active hyperlink.
> 2) Click on the hyperlink to see the actual PIA questions.

Records / FCC Forms 471

FY 2016 - Category 1 - Central Dauphin - #161009546 Follow

Summary
News
Related Actions
Funding Requests
Review Inquiries ▸
Connectivity Information
Discount Calculation
Entity Information

Request Extension | Respond to Inquiries | Apply Summer or Winter… | ··· ▾

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date	Due Date	Extn.	Status
✕	🕓	Eligibility of Products and Services	Regular 15-Day	Brooke Taylor	Case Management Associate	973-581-6700	6/27/2016 7:51 AM EDT	7/12/2016	0	Response Needed

Submitted Inquiries

> Shows the date by which your PIA answers must be submitted. If you need additional time, click "Request Extension."

4

PIA Questions Page

Read the Question carefully and upload or provide an answer as appropriate. When all questions have been completed, click "Submit."

Issue

For FRN 1699022481, additional documentation is required to allow us to determine the eligibility of your request.

Question(s)

This page will timeout after an extended period of inactivity. Please periodically save your work using the 'Save & Close' button below. You may then use your browser's 'Back' button to return to your work.

#	Question	Response
1	Please provide vendor documentation which supports the funding request amount of $465.02. Note: Any vendor documentation (e.g. contracts, vendor quotes, vendor bills, invoices, etc.) provided should clearly identify any ineligible charges that were cost allocated out of your request. Also, please be sure to explain any discrepancies between the amount requested and amount supported.	_____ [Browse...]
2	If you are requesting additional dollars to accommodate expected growth or increased usage, please provide any relevant documentation that you used when determining the estimate for expected growth or increased usage.	_____ [Browse...]

+Add Document

To add additional documents, click "Add Document."

[Delete Uploaded Files]

[Save & Close] [Submit]

To See What Was Submitted...

To see the responses submitted, click on the "+" sign next to Submitted Inquiries, and it will display each inquiry. Click on the Name to see your responses/documents.

Pending Inquiries

☐	Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date ↓	Due Date	Extn.	Status
						No Pending Inquiries.					

[Close]

Submitted Inquiries   ⊞

Submitted Inquiries   ⊟

Name	Outreach type	Answered By	Assign Date ↓	Answered Date
Eligibility of Products and Services	Regular 15-Day	Julie Tritt Schell	6/24/2016 12:25 PM EDT	6/27/2016 3:27 PM EDT

To See the 471 Status....

On the left toolbar, click on "Summary" and at the top of the page it will show the "Stage" at which this Form 471 is in the process.

What Happens Next?

- After PIA review, the application likely will move to "Wave Ready" status which likely means that the application will be funded in an upcoming wave
  - All FCDL notifications will be appear in EPC
  - See http://e-ratepa.org/?p=13411 for details on finding the FCDLs in EPC
- After the FCDL is issued, the next step is to file the Form 486 to "turn-on" funding

Ministerial and clerical (M&C) errors are defined as data entry errors or mistakes applicants made on the Form 470 or Form 471. Such errors include only the kinds of errors that a typist might make when entering data from one list to another, such as mistyping a number, using the wrong name or phone number, failing to enter an item from the source list onto the application, or making an arithmetic error. USAC can process requests to correct M&C errors until the time that a Funding Commitment Decision Letter (FCDL) is issued.

Allowable & Non-Allowable Corrections
USAC can process allowable corrections to M&C errors, and the applicant does not need to file a new form. See below for examples of allowable corrections.

Applicants must file a new form to correct non-allowable corrections. See below for examples of non-allowable corrections. Remember that, if you must file a new form, your new form must still meet these program deadlines:

- A new Form 470 must be posted for at least 28 days before the close of the filing window because the applicant must wait at least 28 days before closing its competitive bidding process, selecting the most cost-effective bid, signing a contract (if applicable), and signing and submitting an Form 471.
- A new Form 471 must be filed before the close of the application filing window to be considered as timely filed.

Some corrections do not need review by USAC. For those that do, USAC currently processes requests for allowable corrections to Form 470 through the E-rate Productivity Center (EPC). Allowable Form 471 corrections are submitted in EPC beginning in FY 2016. In many cases, USAC can determine whether the correction is allowable and, if so, complete the correction without requesting additional information. However when the nature of the correction is not apparent, USAC may request the appropriate source documentation to determine whether the correction is allowable. Source documentation is the documentation containing the information used to prepare the form (e.g., contract, vendor quote, NSLP data, etc.).

You will be informed if your Form 471 correction was allowable and if it was processed in your Funding Commitment Decision Letter (FCDL).

Examples of Corrections

Allowable FCC Form 470 Corrections
- Editing the application nickname
- Adding one or more Form 470 RFP documents
- Changing the main contact person
- Editing the technical contact person on the Form 470

Allowable Form 471 Corrections
- Spelling errors
- Simple addition, subtraction, multiplication or division errors
- Transposed letters and numbers
- Misplaced decimal points
- Other punctuation marks (hyphens, periods, commas, etc.) included or not included or misplaced
- Failing to enter an item from the source list (e.g., NSLP data, FRN, etc.)
- Incorrect citations such as:
  - Form 470 number
  - Discount percent
  - Urban/rural status
  - Contract number
  - Billing Account Number/Multiple Billing Account Numbers
- Updates or changes to contact person and/or consultant information
- Errors in dollars figures on an FRN
- Adding or removing entities accidentally omitted or included in Form 471
- Accidental omission of FRNs from the Form 471
- Changing the amount of the technology budget in the Form 471 certification
- Changing the service delivery time period (e.g., month-to-month to contractual, recurring to non-recurring)
- Mis-keying the Service Provider Identification Number (SPIN) or service provider name
- Corrective SPIN changes
- Correcting the annual charges for recurring charges
- Incorrectly identifying ineligible charges and services or products

Non-Allowable Corrections
- Operational SPIN changes
- Changes to the services on the Form 471 funding request that are not a result of an M&C error (e.g., renegotiated contract terms or pricing)
- Adding an entity to the Form 471 that was not listed in the original source document
- Revising NSLP data dated after the close of the filing window
- Adding a category or categories of service on the Form 470 after it has been posted
- Adding new services or changing service descriptions on Form 470 and RFPs after the forms have been posted
- Changes based on service provider documentation that was not used in the applicant's competitive bidding process or that is dated after the close of the filing window

Submitting Form 470 Corrections
Requests to correct Form 470 M&C errors should be submitted to USAC using the E-rate Productivity Center (EPC) as soon as the errors are detected by the applicant. USAC will accept and process requests until an FCDL is issued. To request a Form 470 correction, follow the submission instructions in the EPC user guide. http://usac.org/_res/documents/sl/pdf/e-rate-productivity-center/MandC-Corrections-Guide.pdf

Submitting Form 471 Corrections

Form 471 corrections can be submitted via EPC's Receipt Acknowledgment Letter (RAL) process and/or during PIA review. USAC will accept and process requests until an FCDL is issued. Please refer to the accompanying guide in this Training Binder.

PIA Detected Errors

Your PIA reviewer may detect a discrepancy between your Form 471 and source documentation provided during review. If so, your PIA reviewer will ask if you would like to make a correction to the application and give you 15 days to respond. Remember that if you do not respond within the 15 days, PIA will process your application with the information available which may result in a reduction or denial of funding.

Examples of Source List Documentation to Submit in Support of M&C Correction Request

- Contract, Service Agreement (signed prior to submission of Form 471) (to validate correct contract award or expiration date)
- Vendor quote, bill, invoice, etc. (to validate a correction to the Prediscount amount)
- RFP, Newspaper listing
- NSLP documentation or student enrollment data (to validate Block 4 corrections)
- Board Minutes, Resolutions (to validate corrections to contract award or expiration date)
- Budget (to validate corrections to Item 25 (d), available technology resources)
- Any other source list in existence as of Form 470 or Form 471 submission date (documentation used to prepare Form 470 or Form 471)

471 Receipt Acknowledgment Letter & Submitting 471 Corrections in EPC
FY 2017
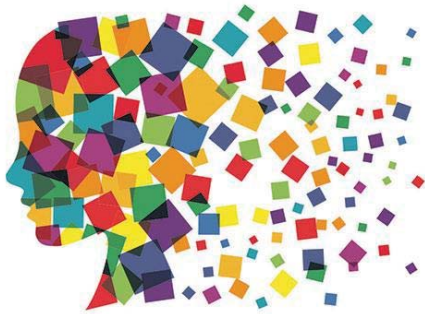
471 Receipt Acknowledgment

- Receipt Acknowledgment Letter is paperless and issued electronically in EPC

- Appears in Newsfeed

E-rate Productivity Center This Receipt Acknowledgement Letter (RAL) is an acknowledgement that USAC has received Lawrence School District's FCC Form 471 - 161000592 for Funding Year 2016 on 3/29/2016. Each service provider featured on this form will also be notified of the information submitted for the service provider.

It is important that you review this form now to make sure the products and services you have listed on your FCC Form 471 are correct and complete, and if necessary, take the appropriate corrective action as soon as possible. You are allowed to correct certain errors on your form, but not others. For fields that allow a correction, you will be able to edit the information in the form field directly. To determine what corrections are allowed and why, see the "List of Correctable Ministerial and Clerical Errors" on our website.

NEXT STEPS
- Gather the documentation you used to complete your form and the entries in your profile (e.g., NSLP numbers, list of entities receiving services, Category Two cost allocations) so that you can respond to questions from USAC about your form.
- Retain documentation showing that you have complied with all standards, with all statutes and E-rate program rules for at least 10 years after the last day of service delivered.
- Remember that applicant budgeted funds to provide necessary resources MUST NOT come directly or indirectly from a service provider.
- Work with your service provider to ensure timely delivery of discounted services.
- You can view your entire Form 471 by clicking the link below.
- You can access the Funding Request report using the link provided in More Info section.

Please keep a copy of this notification for your records. To print this notification, click on the Date below, and use your browser's print function.

3-29-16 Demonstration...   #120 – Lawrence Scho...

Mar 29, 2016 ☆   Comment   More Info ▾   Click on Date Hyperlink to print copy of RAL

Submitting Corrections in EPC

- Corrections may be made after 471 certification and prior to issuance of FCDL

EPC Landing Page > FCC Forms (bottom of page) > FY 2017 Form 471 Certified

FCC Forms

Form Type	FCC Form 471		Status	○ All
Funding Year	2016			○ Incomplete
				● Certified
				○ Committed

Application Number	Nickname	Funding Year	Status	Certified Date
161000592	3-29-16 Demonstration Form 471	2017	Certified	3/29/2016 12:14 PM EDT

Click on the blue Form 471 # for the application you'd like to modify

3

Submit Modification Request (RAL)

Select "Related Actions" and then "Select "Submit Modification Request (RAL)

USAC TRAINING

Summary
News
Related Actions ▸
Funding Requests
Review Inquiries
Connectivity Information
Discount Calculation
Entity Information

Records / FCC Forms 471
3-29-16 Demonstration Form 471 - #161000592 [Follow]

⚡ **Respond to Inquiries**
Answer Reviewer Questions

⚡ **Submit Modification Request (RAL)**
Submit a RAL Modification Request for this Application.

Form 471 Modification Request

Would you like to request changes to an entity or this application?

[Application] [Entity]   Select "Application " to submit a correction

RAL Request Help   ⊞

[Discard Request]   [Finish & Submit Request]

4

Application Details – RAL Corrections

Form 471 Modification Request

Would you like to request changes to an entity or this application?

[Application✓] [Entity]

Select the sub-category you want to modify

Please select a value	▼

Please select a value
Application Details
Funding Request Details

> Only allowable corrections to Application Details are the Nickname or Contact Person

Application Details

How would you like to proceed?

[Cancel Application] [Edit Application✓]

Application Nickname *
3-29-16 Demonstration Form 471

Main Contact Person *
School District 7 User 1 ×

School District 7 User 1
school.district7.user1@mailinator.com
555-555-5555

Please select a main contact person by typing the contact person's name or email address.

Enter Holiday Contact Information

Please provide any alternate contact information to use during holiday/ vacation period including the name of any alternate contact person and how best to reach them.

5

Funding Request Detail Corrections

Form 471 Modification Request

Would you like to request changes to an entity or this application?

[Application✓] [Entity]

Select the sub-category you want to modify

Funding Request Details	▼

Funding Requests

	FRN ↑	Nickname	Number of Line Items
☑	1699000607	Voice Services	2
☐	1699000608	Internet to Rural School	1
☐	1699000609	Building to Building Data Connections	3

[Add FRN] [View Line items] [Edit Funding Request] [Edit Purchase Agreement]

> Options include:
> - Add FRN
> - View Line Items – make changes to Line Item amounts or Recipients of Service
> - Edit Funding Request – make changes to FRN Key Information or Cancel FRN
> - Edit Purchase Agreement – change contract to associate with FRN

6

3 Steps to Confirm Submission

Edit Funding Request details

Cancel FRN   Edit FRN Key Information✓

Funding request details for FRN # 1699000609 - Building to Building Data Connections

*Funding Request Nickname   Building to Building Data Connections   Service Type   Data Transmission and/or Internet Access

Narrative

Building to building connections for School District

1. Click on "Save and Continue"
2. Click on "Finish and Submit Request"
3. Click on "Yes" in the pop-up box to verify you are sure you want to submit the correction

Save and Continue

Requested Changes

	Category	Name/Number	Change type	Old value	New value	Requested date
	Funding Request Details	1699000609	Modify Funding Request Narrative Information	Building to building connections	Building to building connections for School District	10/12/2016 7:02 PM EDT
	Funding Request Details	1699000609	M... Ir...	...ing	Building to building connections cccc	10/12/2016 7:00 PM EDT

Are you sure you want to submit the request?

No   Yes

Remove

RAL Request Help

Discard Request   Finish & Submit Request

The selective review is a separate component of the Program Integrity Assurance (PIA) review process that follows up on certifications that applicants make on their FCC Forms 471 about the competitive bidding process and the necessary resources to make effective use of requested services. Like PIA inquiries, Selective Review inquiries and responses are posted in EPC. An email notification will be sent to the 471 contact person and will prompt the contact to log into EPC and review the inquiries for the 471.

During a selective review, SLD will look at the applicant's competitive bidding documentation to ensure that a fair and open bidding process occurred. SLD will also review the applicant's budget to ensure that there is sufficient money in the budget to pay for the non-discount share, and review all of the other resource areas that are part of the FCC Form 471 certifications. Other resource areas covered by the FCC Form 471 certifications include training, professional development, computers, software, electrical capacity, and maintenance to ensure that the applicant can successfully implement technology in the school or library.

The selective review takes place at the billed entity level. An entity is considered a billed entity if it is responsible for making payments directly to a service provider. An entity that receives a bill, but does not make payments to the service provider for that bill, is not a billed entity. Generally, this means that the review will take place at the school district, consortium, or library system or consortium level. In a selective review, USAC requests and reviews information for all FCC Forms 471 that were filed by the billed entity for the current funding year.

Selective Review Information Request
The Selective Review Information Request (SRIR) is the document that USAC will issue to the applicant via EPC to inform the applicant of being selected for selective review and to identify the information that will need to be provided to USAC.

During some selective reviews, SLD might look only at competitive bidding process or specific areas of the certifications on the FCC Form 471 application. For example, instead of reviewing all components of the selective review (competitive bidding, technology plan, budget, and FCC Form 471 certifications), the SLD may focus specifically on one or more of them. The SRIR itself will only provide brief instructions on how to complete the document.

SRIR Submission Timeline
Applicants that receive a selective review request that covers the competitive bidding process and all of the areas covered by the certifications on the FCC Form 471 application, will have thirty (30) calendar days to submit their response and associated documents from the date of the SRIR.

However, if the applicant receives a selective review that only covers the FCC Form 471 certification areas or the competitive bidding process, all information requested must be received within 15 calendar days from the date of the SRIR.

Please note that USAC is unable to grant multiple or lengthy extensions to respond to the SRIR. However, during the course of the selective review, if information submitted is incomplete or raises

other concerns related to the review, USAC will contact the applicant for any additional information or supporting documentation that is required to complete the review. If any information submitted leads to a reduction or denial of a funding request, USAC will inform the applicant of its intention to modify or deny the funding request to ensure that the applicant agrees with the modification or denial. If the applicant does not agree, the applicant will have the opportunity to submit additional information or documentation to support the applicant's position prior to the issuance of a Funding Commitment Decision Letter (FCDL).

SRIR Response

Confirm Receipt - First, acknowledge receipt of the SRIR by contacting the USAC reviewer named in the SRIR.

Verify the FCC Form 471 and Billed Entity Number - Notify USAC immediately if there are any additional FCC Form(s) 471 for the Billed Entity Number that are not listed on the SRIR cover page. Also, please include any applications that may have been filed under a different Billed Entity Number if that entity belongs to the billed entity (e.g., elementary schools within a school district that file their own applications in addition to the applications filed on their behalf by the district). The selective review will include those applications as well.

Failure to identify additional applications may delay or jeopardize funding commitments and/or post-commitment disbursements. It may also result in adjustments to any funding commitments that the applicant may receive in the future, or other action. PIA review of applications for the billed entity will continue, but no new funding commitments or payments for existing funding commitments for current funding year applications for this billed entity will be processed until the selective review is completed.

Provide Complete Response - USAC encourages applicants to provide a full and complete response. USAC urges applicants to carefully review the response before returning it to ensure that complete answers to all questions have been provided. Incomplete responses may result in the delay in the review and approval of funding requests.

Submit Supporting Documentation - USAC requests copies of documents associated with your competitive bidding process, such as the relevant expense and revenue pages of your operating budget. Please indicate on the first page of each submitted document the document title and the corresponding Funding Request Number(s) (FRNs) Please indicate on the first page of each submitted document the document title and the corresponding Funding Request Number(s) (FRNs).

Complete and Submit SRIR Certification and Worksheets - The following documents may be enclosed in the SRIR:

- SRIR checklist
- FCC Form 471 certification worksheet summary
- Technology implementation level worksheet
- SRIR completion certification

To assist in completing these documents, refer to the SRIR instructions and the FCC Form 471 Certification Worksheet instructions, both are which are contained this tab of the training manual. Selective review instructions include clarifications and examples that expand on the SRIR instructions sent to applicants.

Who Can Respond to the SRIR?
The applicant or the applicant's authorized representative can respond to the SRIR. If the applicant's authorized representative responds, the applicant must submit a Letter of Agency (LOA) or consulting agreement authorizing the authorized representative to act on the applicant's behalf. Remember, however, that service providers may not act as the applicant's representative in this case and may not complete the SRIR for any applicant.

Status Updates
Note that the selective review is independent of other reviews conducted by PIA which may or may not still be in progress. To learn the latest status of a FCC Form 471 application, please refer to the form in the E-rate Productivity Center or use the FRN Status Tool. For FY2015 and prior, check your application status in the FCC Form 471 Status tool. The outcome of all of the selective reviews or PIA reviews will be provided to you in a Funding Commitment Decision Letter (FCDL).