

Emergency Connectivity Fund (ECF) Window 3

... July 1, 2022 – December 31, 2023



Presented by:
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Topics to Cover

- Overview of Windows 1, 2 and 3
- Availability of Funding for Window 3
- Entity and Recipient Eligibility
- Determining Unmet Needs
- Eligible/Ineligible Equipment & Services
 - Continuing Internet services in Window 3
- Replacing School-Owned Devices
- Options for Areas with No Internet Access
- Reimbursement Options
- Making Post-Commitment Modifications
- CIPA
- Record Keeping Requirements
- Application Process and Form 471
- ECF Resources
- Answers to Questions



ECF Background

- \$7.17 billion passed by Congress in March 2021 as part of the American Rescue Plan
- Provides funding to schools and libraries to enable remote (off-campus) learning students, staff and library patrons who lack sufficient internet access and/or connected devices
- Funding not just for schools that are conducting virtual education
 - Intended to help solve Homework Gap as well
 - Anywhere that a student learns when not on school campus
 - Any library patron can benefit (not just students or remote learning)
- Quasi Relation to E-rate:
 - E-rate provides *discounts* between 20-90% for *on-campus* connections and *in-building* data transmission equipment
 - ECF uses same EPC log-in credentials, but has entirely different rules, eligible services/equipment and deadlines



ECF Windows 1 & 2

- Application Windows 1 & 2 covered unmet needs from July 1, 2021 – June 30, 2022
 - Equipment/services had to be received on/after July 1, 2021
 - Orders were permitted to be *placed* prior to July 1, 2021
- FCC extended this cycle through June 30, 2023
 - New FY 2021 eligible dates: 7/1/2021 – 6/30/2023
 - Only 12 months of Internet access permitted during this 24 month period
- Reimbursement deadline for Windows 1 & 2 is August 29, 2023
- \$5.8B requested --> \$4.7B committed --> \$558M disbursed
- At least \$1B remains and will be available in ECF Window 3



ECF Window 3

- Window 3 Application Window:
April 28, 2022 – May 13, 2022
- Application Window 3 will cover unmet needs from:
July 1, 2022 – December 31, 2023
 - Equipment/services must be received on/after July 1, 2022
 - Orders may be placed prior to July 1, 2022
- Only 12 months of Internet access permitted during this 18 month period
 - Cannot overlap service months from Windows 1 & 2
- Applicants that received funding in Windows 1 & 2 can apply for additional funding if unmet needs remain
- Reimbursement deadline for Window 3 is February 29, 2024
- All other eligibility/rules remain the same as Windows 1 & 2
- Will likely be last ECF application window unless Congress appropriates more \$



What Happens if \$1B Isn't Enough?

- If demand exceeds funding available (estimated to be at least \$1B), highest poverty schools and libraries will receive priority until funds are exhausted
- Higher priority given to rural schools and libraries within each band
- ECF Prioritization Matrix:

Emergency Connectivity Fund Prioritization Matrix		
% of students eligible for National School Lunch Program	Urban Discount	Rural Discount
< 1.....	20	30
1-19.....	40	55
20-34.....	50	65
35-49.....	60	75
50-74.....	80	85
75-100.....	90	95

- *Note: Discounts and pro-ration will not apply*



Who is Eligible to Apply

- All schools and libraries eligible for E-rate funding are eligible for ECF
 - Not required to currently participate in E-rate
 - If you are a brand new school or library, contact USAC at 888-203-8100 to establish a One Portal account
- All ECF forms are filed in USAC's One Portal System (where EPC is housed)
 - If the person submitting the ECF application for your s/l is not set up as an EPC User, contact USAC for instructions on how to become Authorized User
- Organization must have up-to-date registration in federal SAM.gov system
 - Registration is not required to be completed at the ECF Form 471 application stage but must be done before an ECF reimbursement can be received
 - All ECF reimbursements will be made to bank account connected to SAM.gov account (not account listed on E-rate Form 498)
 - All ECF reimbursement deposit notifications will be sent to SAM.gov contact (not ECF contact), so be sure this contact info is accurate
 - SAM.gov registration is free (don't pay a fee to someone to do it)
 - All E-rate and ECF applicants will need a SAM.gov registration in the near future



Eligible Recipients and Locations

Recipients:

- K-12 students, teachers, paraprofessionals with Unmet Needs
- Library patrons with Unmet Needs
- “Unmet Need” – the person who does not otherwise have “sufficient” internet access or access to a connected device to engage in remote learning when off campus

Locations:

- Any off-campus location where education is occurring. Examples:
 - Student, teacher or library patron homes
 - Community centers
 - Churches
 - **School buses**, both parked and moving
 - Bookmobiles
- Equipment/services may not be purchased solely for use at school or library; however, the devices may be brought to the school/library



Stages of “Unmet Needs”

@ Form 471 Application Stage:

- Schools must provide **reasonable estimate** of how many students/teachers have unmet needs
 - Can be based on survey, NSLP data, census data, etc.
 - Must describe in 471 survey narrative how you determined unmet need estimates on 471

@ Reimbursement Stage:

- ECF reimbursement requests must be based on actual purchases and be **trackable to specific students/teachers** that have received equipment
- Be prepared to provide evidence of actual unmet needs by recipient
 - Signed Unmet Needs Certification: <http://e-ratepa.org/?p=33555>
 - Individual survey responses



Competitive Bidding & Caps

Bidding:

- No separate federal competitive bidding requirements imposed
 - UGG procurement rules do not apply
- Must comply with state and local procurements requirements
 - For laptops/tablets, most schools purchase from COSTARs or PEPPM
- Additional requirements if seeking funding to install internet in currently unserved areas *

Funding Caps/Budgets:

- Funds 100% of eligible costs, subject to 2 device caps
 - Connected devices (\$400) and Wi-Fi hot spots (\$250)
- No applicant budgets like Category 2
- No E-rate discounts



What's Eligible: Equipment

- Connected Devices = laptops/tablets
 - Maximum reimbursement/device = \$400 (can be higher for students with disabilities)
- Wi-Fi hotspots / Cellular aircards
 - Maximum reimbursement/device = \$250
 - Cap does not include monthly internet service costs
 - Cap does not apply if the hot spot is serving multiple users, such as a school bus location. Explain in FRN narrative that X number of users are being served
- Modems, routers (and devices that combined these)
- Chromebook licenses and manufacturer warranties are eligible but only if they are bundled with the cost of the laptop (cannot be a separate cost)
- 12 months of lease charges
 - Window 3 will cover another year's equipment lease charges
- Shipping, taxes, configuration charges, but are not in addition to \$ caps
- Restrictions:
 - No more than 1 laptop/tablet per person (student, teacher, library patron)
 - Schools must restrict device access to only students/teachers/patrons with appropriate credentials (can't be used by everyone in the home)
 - Must be used "primarily" for educational purposes
 - Credentialed person may use for other purposes when not needed for educational activities





What's Eligible: Services

- Mobile wireless, cable modem, DSL, FIOS Internet (most common)
 - Less common: fixed wireless, microwave, satellite, leased lit fiber
- Installation, activation, taxes
- No monthly \$ caps
- Restrictions:
 - No more than 1 fixed internet connection per location (cable, FIOS, DSL)
 - No more than 1 Wi-Fi hotspot per person
- Recipients of Windows 1 & 2 ECF can apply for continuation of internet services in Window 3
 - Cannot overlap months
 - ECF Windows 1 & 2 will pay for 12 months of service between 7/1/2021 – 6/30/2023
 - Window 3 will pay for 12 months of service between 7/1/2022 – 12/31/2023
- In Form 471 Narrative list:
 - Windows 1 and/or 2 FRN numbers and actual service delivery dates
 - Window 3 requested service delivery dates

Continuing Internet Examples



- **Example 1:** School originally applied for 12 months of Internet service that began on July 1, 2021. Funding for that service ends June 30, 2022. School can now apply for another 12 months of Internet service any time within the new 18-month period, but likely they will seek funding in Window 3 for July 1, 2022 – June 30, 2023.
- **Example 2:** Library originally applied for 12 months of Internet service but did not begin using that service until October 1, 2021. Thanks to FCC’s recent service delivery extension for FY 2021, library can receive 12 months of ECF funding from October 1, 2021 – September 30, 2022. Library can also apply for Internet in Window 3, likely from October 1, 2022 – September 30, 2023.
- **Example 3:** Library originally applied for 12 months of Internet service but did not begin using that service until February 1, 2022. Library can use 12 months of Window 1 or 2 funding through January 31, 2023. Library may apply for **11 months** of Window 3 funding from February 1, 2023 – December 31, 2023.

Keep in mind that no funding is guaranteed in Window 3



Tracking Usage

- **ECF will only fund devices/internet that are being used**
- **ECF Reimbursement Certification:** Cannot willfully or knowingly requesting reimbursement for services and equipment that are not being used.
 - Exception would be during school's summer break
- **USAC Recent Guidance:**
 - ECF participants should take reasonable actions to monitor and track the usage of equipment and services that are purchased and used through the ECF program
 - For example:
 - Applicants could ask their service providers to provide monthly reports or data use
 - Ensure a hotspot device is activated
 - ECF participants should be prepared to explain what actions were taken, if asked how they complied with the non-usage certification during an audit or other post-commitment review

What's *Not* Eligible

- Desktops
- Smartphones
- Spare equipment/parts
- Software
- Filtering
- Firewalls/services
- Backup power equipment
- VPN licenses
- White Glove installation
- Microphones (stand-alone)
- Cameras (stand-alone)
- Accessories (bags, headsets, etc.)
- Technical support
- Accidental device protection or insurance-type warranties
 - Warranties up to 3 years that are bundled at no cost are eligible
- Remote learning subscriptions (Zoom)

Duplicate funding prohibition: Applicants cannot seek ECF funding for equipment or service that have already been or will be purchased with other targeted pandemic funding



Replacing School-Owned Devices

1:1 Initiatives do not automatically qualify for ECF funding

- If a school provides a laptop to each student and has a technical reason why a school-owned device 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 – *regardless of whether a student has their own device at home*.
- If a school provides a laptop to each student but it is not required to access the school's curriculum or Internet, 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.



*Options for Areas with No Service

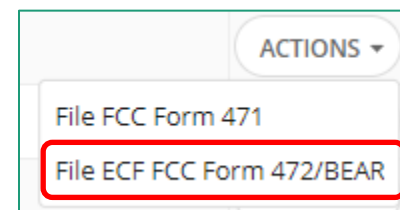
- Where no commercial Internet access service is available in an area that is sufficient to meet remote learning needs, applicants have 2 options:
 - ECF will pay for **construction of new networks** to serve students, school staff & library patrons **OR**
 - ECF will also pay for **customer premises equipment to receive datacasting services**
 - “Clear evidence” of no commercial internet options is required
 - Applicants will be required to prove that they requested service from all existing providers serving the area (both wired and wireline) & that the providers were unwilling or unable to provide service sufficient to meet remote learning needs
 - See sample vendor survey/cover letter at: http://e-ratepa.org/?page_id=32310
- Construction/installation must be completed, and service must begin, within 1 year of FCDL



* Reimbursement Process/Options

- Reimbursement forms filed in ECF Portal System
 - Copies of **vendor invoices** and **proof of equipment delivery** must be uploaded with all reimbursement forms
- **3 options** for receiving ECF reimbursements:
 - 1) School/library receives equipment/services, pays vendor, submits BEAR to USAC
 - 2) School/library receives equipment/services, requests “Prospective Reimbursement” from USAC *
 - USAC will transfer \$ to applicant
 - Applicant pays vendor within 30 days
 - Applicant uploads proof to USAC that payment has been made
 - 3) School/library receives equipment/services, vendor submits SPI to USAC to be reimbursed *
 - Must upload **proof of vendor willingness** on ECF Form 471 application
 - Vendors not required to agree to this
- **ECF BEAR Deadlines:**
 - Windows 1 & 2 – August 29, 2023
 - Window 3 – February 29, 2024

* Options 2 and 3 are best if applicant cannot afford to pay for equipment/services and wait to get reimbursed



A screenshot of the ECF Portal System interface. It shows a dropdown menu with the title "ACTIONS" and a downward arrow. The menu contains two options: "File FCC Form 471" and "File ECF FCC Form 472/BEAR". The second option, "File ECF FCC Form 472/BEAR", is highlighted with a red rectangular border.





Modifications

- Can change these after application is funded:
 - Make/model of equipment
 - Services
 - Service provider
 - Invoice mode
- Cannot increase costs
- Modification “post commitment requests” are submitted in ECF portal

The screenshot displays the ECF Portal interface with the following elements:

- Log into ECF Portal:** A green arrow points to the top left. The header includes the logo for Universal Service Administrative Co. and links for [Subscribe](#), [Payments](#), [Open Data](#), and a [Sign In](#) button.
- Form 471 (My Forms and Requests):** A green arrow points to the left. A blue button labeled [My Forms and Requests](#) is visible.
- Click on relevant Form 471:** A green arrow points to the left. The page shows "CENTRAL DAUPHIN SCHOOL DIST" and a red-bordered box containing the ID "ECF202107046".
- Related Actions:** A green arrow points to the left. A horizontal menu contains tabs for [Summary](#), [Funding Requests](#), [Unmet Needs](#), [Certifications](#), [Communications](#), and a red-bordered [Related Actions](#) button.
- Create a Post-Commitment Request:** A green arrow points to the left. A blue lightning bolt icon is next to the heading [Create a Post-Commitment Request](#), with the subtext "This function allows you to create a Post-Commitment request."

CIPA

- ECF Order imposes new filtering rules for both E-rate and ECF
- CIPA now applies to the use of any S/L library-owned computer if S/L receives ECF or E-rate funding for internet access or E-rate internal connections
 - Be sure to check with your IT office to ensure that your school is CIPA compliant under these new rules



10 Yr. Recordkeeping Requirement

- **Services:**
 - Type of service (i.e., DSL, cable, mobile wireless, satellite)
 - Service plan details including upload & download speeds and monthly data cap
 - Name of person receiving service
 - For fixed broadband service (DSL, cable) also must record:
 - Service address
 - Installation date of service
 - Last date of service
- **Equipment:**
 - Device type (i.e., laptop, tablet, mobile hotspot, modem/router)
 - Equipment make, model, serial number
 - Name of the person to whom the device was provided
 - Loan date and return date of the equipment
 - or date of notification of lost, missing or damaged equipment
 - For equipment used to provide service to multiple individuals (for example, school buses or bookmobiles) inventory **also** must include the name of the school or library employee responsible for that device; and the dates the device was in service





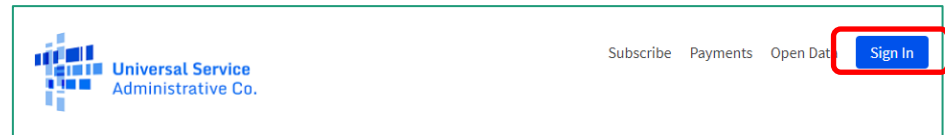
Application Process

- 1) Determine “unmet needs”
- 2) Obtain vendor quotes (contracts not required)
- 3) Submit ECF Form 471 in the One Portal system between **April 28 – May 13, 2022**
<https://forms.universalservice.org/portal/login>
- 4) USAC will review all applications submitted “in-window” and size demand to determine which applications can be funded
 - Applicants may receive PIA inquiries, just like E-rate
- 5) Funding Commitment Decision Letters (FCDL) will be issued in bi-weekly waves
 - No Form 486 required
- 6) Obtain signed Unmet Needs Statements
- 7) Deliver/loan equipment/services
- 8) Applicants or vendors seek reimbursement from ECF Fund *
- 9) Funds deposited into school/library/vendor bank accounts connected to SAM.gov



Form 471 Application

Log into One Portal

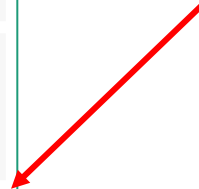


E-rate Productivity Center (EPC) - E-rate Program participants use the E-rate Productivity Center to manage program processes, receive notifications and to contact customer service.

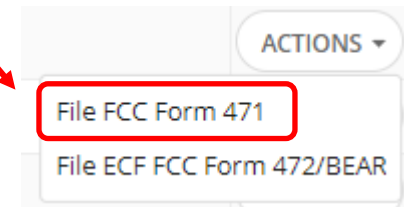
FCC Form 472 (BEAR) - Applicants file an FCC Form 472 (Billed Entity Applicant Reimbursement (BEAR) Form) to request reimbursement from USAC for the discount amount of the eligible products or services that the applicant has received and paid for in full.

Emergency Connectivity Fund (ECF) - Emergency Connectivity Fund participants use the ECF Portal to submit applications and review notifications regarding their program activities. Using this link, schools and libraries can also access the FCC Form 472 (BEAR) and service providers can access the FCC Form 474 (SPI) to request ECF reimbursement.

Select Emergency Connectivity Fund



Under 'Actions', Select File FCC Form 471



Page 1: Complete Nickname/Contact Info:

Application Nickname

Please enter an application nickname here. ? *

ECF Window 3 Devices

Contact Information

Are you the main contact person?

YES ✓ NO

Form 471: 'Unmet Needs' Survey

- ECF Form 471 includes a series of questions regarding the unmet needs of their students and/or teachers – libraries don't receive these questions

Information for Unmet Student Needs

- **Survey Questions:**

- 1) # of students who did not have access to adequate laptops/tablets, Internet access, or both when the pandemic began
- 2) # of students to whom you provided laptops/tablets, Internet access, or both during xxxx school year (not sure which dates will be on the form)
- 3) # of students to whom you will be using ECF to provide laptops/tablets, Internet access, or both
- 4) Even after ECF funding, how many students will lack laptops/tablets, Internet access, or both
- 5) **Narrative:** Applicants will be required to describe how and when they collected the information that they use for the estimates provided in their responses

* Explain in narrative if answer includes teachers





Form 471 Funding Requests

- **FRN Key Information**
 - Vendor (SPIN or vendor info if no SPIN)
 - Delivery dates (more guidance on this coming)
 - New construction for areas with no service questions
 - Narrative with option to upload vendor documentation – **UPLOAD VENDOR QUOTE and EXPLAIN INTERNET SERVICE DATES/FRNS FROM FY 2021**
- **FRN Line Item Information: *Services***
 - Type of connection (cable modem, mobile broadband, etc.)
 - Bandwidth (upload/download)
 - Monthly/One-time costs – quantities
- **FRN Line Item Information: *Equipment***
 - Type of product (tablets/laptops, wi-fi hot-spots, modems, routers, etc.)
 - Make/model
 - One-time costs - quantities
- **Invoicing Mode Question**
 - Will applicant or vendor be submitting reimbursement forms? – **UPLOAD VENDOR AGREEMENT LETTER FOR SPI REIMBURSEMENTS**



ECF Resources

- ❖ ECF Form 471 Application (in One Portal): <https://ecfportal.usac.org/suite/sites/ECF>
- ❖ USAC ECF Information Page: www.emergencyconnectivityfund.org
- ❖ USAC ECF Form 471 Guide: <https://www.emergencyconnectivityfund.org/ecf-fcc-form-471/>
- ❖ USAC Training Modules: <https://www.emergencyconnectivityfund.org/training/>
- ❖ USAC ECF Customer Service Support Center:
1-800-234-9781 Monday – Friday 8 am – 8 pm Eastern Time
- ❖ FCC FAQ/Summary: <https://www.fcc.gov/emergency-connectivity-fund-faqs>
- ❖ PA ECF Resource Page: http://e-ratepa.org/?page_id=32310
- ❖ PA ECF Unmet Needs Guidance/Examples: <http://e-ratepa.org/?p=33555>
- ❖ SAM.gov: <https://sam.gov/content/home>

Attendee Questions....





Answers to Questions

- **Is installation and configuration that is performed by a third-party vendor (different from the vendor that sold the equipment to the applicant) eligible for ECF reimbursement?**

Answer: No

- **Can we request funding for service for all 18 months of the relevant funding period for the third application filing window?**

Answer : No. Applicants may only request support for a maximum of 12 months of eligible services during the third application filing window that covers eligible equipment and services received or delivered between July 1, 2022 and December 31, 2023. On the ECF FCC Form 471, an applicant should provide the service start and end dates for the 12 months of service that will be requested during that funding period.

- **Can a school or library submit an application in Window 3 to continue services that were funded through a first or second window funding request?**

Answer : Yes, provided they are not requesting duplicative funding for equipment or services that are committed and were or will be funded through the applicant's first or second window funding requests.

Answers to Questions

- **Can we share our E-rate-funded Internet off-campus?**

Answer: No. Not under current rules.

- **Do school buses need to be owned by the District in order to qualify for ECF?**

Answer: No

- **Is it only K-12 or is Early Intervention eligible?**

Answer: In PA, K-12 education is defined as ages 3+. Therefore, early intervention students ages 3+ will qualify for ECF devices/services.

- **Can this be an extension of data service from round 1?**

Answer: Yes, but funding is not guaranteed

- **Can we submit for the balance of previously deployed devices plus a projected amount for the following SY?**

Answer: Unsure of exact question, but you must explain how you projected (estimated) unmet need for Window 3.



Answers to Questions

- **Do we just submit a 471 for this & how does the new 471 relate to the previously submitted form?**

Answer: Yes, a new Form 471 is required for Window 3. There is no continuation of the FY 2021 ECF Form 471.

- **Are we allowed to request laptop lease payments in Window 3?**

Answer: Yes, 12 months of lease payments are eligible in Window 3 for students/teachers with documented unmet needs. If you received ECF funding for lease payments in FY 2021, be sure that the total cost you're seeking per device does not exceed the \$400 cap.

- **If we already received funding from round 1 are we still eligible?**

Answer: Yes, if your school or library still has unmet needs.

- **Are the tablets required to be internet enabled or can they be wi-fi enabled?**

Answer: They must be wi-fi enabled. A monthly internet service plan is not required.

- **We are operating in-person instruction 5 days a week. Do we qualify?**

Answer: Yes. ECF funding can be used to close the Homework Gap, not just for when your school is remote learning.



Answers to Questions

- **What would the rules be to purchase laptops for some of our library staff. Or if that's even allowed?**

Answer: Library staff do not qualify for ECF equipment/services. If that staff member has an unmet need at home, the library could loan the staff member a device for off-campus use, just as they would any library patron with an unmet need.

- **We currently have ECF funded T-Mobile connectivity for 60 hotspots. Will this new round allow us to extend that ECF funded connectivity for another year?**

Answer: Yes, you can apply for another 12 months of ECF funding for those service plans. Keep in mind that funding is not guaranteed as only \$1B is available.

- **Can ECF be used for teacher replacement of laptops?**

Answer: If the teacher has an unmet need at home, the school can apply for ECF funding for those devices. The school should do a survey to determine which teachers have an unmet need, and then the teacher should sign an unmet need certification when the device is distributed.

