Emergency Connectivity Fund (ECF) Overview/Update

… for PA Libraries

Presented by:
Julie Tritt Schell, PA E-rate Coordinator
PA Department of Education
July 21, 2021
www.e-ratepa.org
jtschell@comcast.net

ECF Background

- $7.17 billion passed by Congress in March 2021 as part of the American Rescue Plan

- Provides funding to libraries (and schools) for off-library campus for library patrons who lack sufficient internet access and/or connected devices – not just students!

- Funds 100% of eligible costs, subject to 2 device caps
  - No applicant budgets like Category 2
  - No E-rate discounts
  - No federal bidding requirements

- Comparison to E-rate:
  - E-rate provides discounts between 20-90% for on-campus connections and in-building data transmission equipment
  - ECF uses same log-in credentials, but has entirely different rules and deadlines

- Resources:
  - https://www.emergencyconnectivityfund.org/
  - https://www.fcc.gov/emergency-connectivity-fund
  - http://e-ratepa.org/?page_id=32310
    - This presentation will be available under Trainings tab

Eligible Funding Period

- "Window 1" will cover unmet needs from July 1, 2021 – June 30, 2022
  - Equipment/services must be received <u>and</u> paid for on/after July 1, 2021
  - Orders may be *placed* prior to July 1, 2021
  - Application window open now and will close August 13, 2021

- "Window 2" will open at a later date if funding remains
  - May cover retroactive purchased between March 1, 2020 – June 30, 2021, or may be cover a second prospective window

- If demand exceeds $7.1B, highest poverty (with ruralness factor) S/L will receive priority until funds are exhausted

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

Who is Eligible to Apply

- All libraries eligible for E-rate funding are eligible for ECF
  - Not required to currently participate in E-rate
  - Can apply as a consortium (such as county library system RWAN)

- Must be set up in E-rate One Portal system
  - Contact USAC at 888-203-8100 to establish account if none exists

- Must be registered in SAM.gov
  - 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 (takes about a week)
  - SAM.gov registration is free (don't pay a fee to someone to do it)
  - All ECF rembursements will be made to bank account connected to SAM.gov account (not account listed on E-rate Form 498)

Eligible Recipients and Locations?

Recipients:

- Library patrons that have an "unmet need" – meaning they don't otherwise have "sufficient" internet access or access to a connected device
- Libraries are not required to conduct survey or answer needs assessment questions on ECF application, however, they MUST have library patrons sign a statement attesting to this need when they check out devices/internet services

Locations:

- Equipment/services may not be purchased <u>solely</u> for use at the library
  - Patrons may bring devices to library

What's Eligible: Equipment

- Connected Devices = laptops/tablets
  - Desktops and cell phones are not eligible
  - Maximum reimbursement/device = $400
- Wi-Fi hotspots
  - Maximum reimbursement/device = $250
- Modems, routers (and devices that combined these)
- Cellular aircards
- Shipping, taxes, configuration charges
- Restrictions:
  - Libraries must restrict access to only patrons with appropriate credentials
  - Must be used "primarily" for educational purposes

What's Eligible: Internet Access

- Wireless internet services
  - Fixed wireless, mobile wireless, microwave, satellite

- Cable & DSL internet services

- Leased lit fiber

- Installation, activation, taxes

- Restrictions:
  - "S/L should to take reasonable actions to monitor and track the usage of equipment and services that are purchased with ECF funding, for example, requiring their service providers to provide monthly reports or other information on data use."

What's *Not* Eligible

- Desktops
- Smartphones
- Spare equipment/parts
- Software, user licenses
- Filtering
- Firewalls/services
- Backup power equipment
- VPN licenses

- Microphones (stand-alone)
- Cameras (stand-alone)
- Accessories (bags, headsets, etc.)
- Technical support
- Separate costs for warranties/protection plans
  - 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*

Determining "Educational Purpose" for Libraries

- "Educational Purposes" has always been an E-rate requirement
  - Discount rates shall be provided to "schools and libraries for educational purposes" (47 USC §254(h)(1)(B), 1996 Telecom Act)

- Schools and libraries have *different* definitions of educational purposes (2nd E-rate Order, 2003)

  (1) Schools: Activities that are integral, immediate, and proximate to the education of students.

  (2) Libraries: Activities that are integral, immediate, and proximate to the provision of library services.

- Libraries provide services far more extensive than just addressing the education of students

- ECF definition of "Educational Purposes" is *same* as the E-rate's

*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 library patrons **OR**
  - ECF will also pay for **customer premises equipment to receive datacasting services** **--** IP data transmitted over public television airwaves to a computer and provides access to remote learning in homes without internet access

- "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

~ If you're applying for build-out funds, please let Julie know ~

Determining "Unmet Needs"

How should libraries determine how many devices they need?

- The FCC has not prescribed a *specific* way for applicants to go about estimating what they will need to address unmet needs

- Three possible options:
    - If you have existing laptop/internet loan program, is it heavily used? Need more?
    - Ask neighboring libraries that already have laptop/internet loan program for estimates of need
    - NTIA broadband mapping data: https://broadbandusa.ntia.doc.gov/resources/data-and-mapping
   > PA data downloaded and posted to: http://e-ratepa.org/?page_id=32310
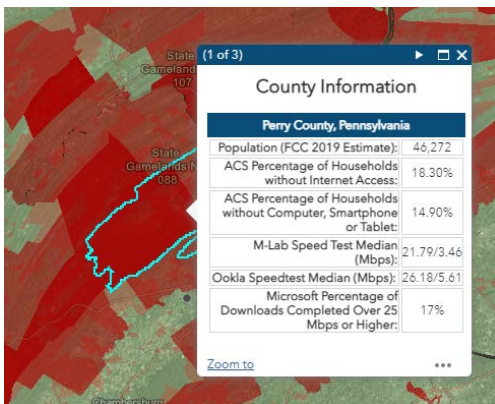
Name	Population 2019 (FCC Estimate)	Total household	Percent of Households that Have No Computer, Smartphone, or Tablet	Percent of Households with No Internet Access
Adams County	103,008	39,345	12.3	15.4
Allegheny County	1,216,045	541,541	10.8	13.5
Armstrong County	64,735	28,137	17.1	20.9
Beaver County	163,929	71,167	13.7	16.7
Bedford County	47,888	19,882	20.6	23.4

Application Process

1) Applicants determine "unmet need" and obtain vendor quotes

2) Submit ECF Form 471 in the E-rate One Portal system by Aug 13
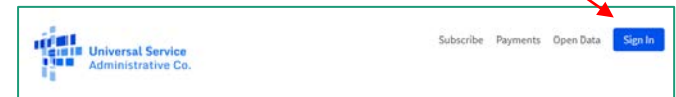
3) USAC will review all applications submitted "in-window" and size demand
   - Applicants may receive PIA inquiries, just like E-rate
   - PIA inquiries being sent now for submitted applications!

4) Funding Commitment Decision Letters (FCDL) issued
   - First FCDLs expected mid-late August
   - No Form 486 required

5) Applicants or vendors seek reimbursement from ECF Fund *

6) Funds deposited into library/vendor bank accounts

* Reimbursement Process/Options

- Reimbursement forms will be filed in One Portal
  - Will be similar to Form 472 BEAR, but not that exact form
  - New invoicing form slated to be ready within 15 days of first funding commitment wave
  - Copies of vendor invoices <u>must</u> be uploaded with all reimbursement forms

- 3 options for receiving ECF reimbursements:
  1) Library receives equipment/services, pays vendor, submits BEAR to USAC
  2) 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) Library receives equipment/services, vendor submits SPI to USAC to be reimbursed
     - Vendors not required to agree to this
     - Must upload proof of vendor willingness on ECF Form 471 application

- **Deadline**: 60 days of equipment/service <u>delivery date</u> (or FCDL/RFCDL date, whichever is later)
  - Recurring services provided through June 2022 may be invoiced through August 29, 2022

ECF Form 471 Application

- Library ECF Form 471 consists of 4 main sections (besides contact info and certifications):
  - **FRN Key Information**
    - Vendor (SPIN or vendor info if no SPIN)
    - Delivery dates
    - New construction for areas with no service questions
    - Narrative with option to upload vendor documentation
  - **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?

* Recipients of Service questions only asked on consortia applications

CIPA

- ECF Order imposes new filtering rules for both E-rate and ECF

- CIPA now applies to the use of <u>any S/L library-owned computer</u> 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 library 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, 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

Attendee Questions….