ECF Window 3 (FY 2022) Insights, Form 471 Do's and Don't's

The 3rd application window for the federal Emergency Connectivity Fund (ECF) program is open from April 28, 2022 to May 13, 2022. The rules and eligibility are identical to Windows 1 and 2, which is to cover the unmet internet and laptop/tablet needs of students, teachers/paraprofessionals, and library patrons when they are not on campus. Window 3 covers equipment purchased and delivered between July 1, 2022 – December 31, 2023 and for 12 months of services delivered between July 1, 2022 – December 31, 2023.   Below are clarifications and insights which I encourage you to review before filing an ECF Form 471 in Window 3.

Clarifications/Updates:

- If you want to update your student counts and NSLP data because your NSLP percentage has increased, provide that information in the FRN narrative box. Specifically, updates should be noted using the following language: "**NSLP Update Request: updated NSLP student count xxx; updated student count xxx; and updated NSLP percentage xx%.**" This will allow USAC to quickly find the ECF applications that include NSLP updates during the third application filing window. USAC will need to validate any changes made to an applicant's student count and NSLP student count numbers so please ensure you have the documentation needed to validate these requested changes. Updates may not be considered if applicants fail to respond promptly to requests for validation, and USAC may rely instead on existing NSLP percentages.

- If you are continuing to receive Internet recurring services between July 1, 2022 through June 30, 2023 from ECF Windows 1 or 2, you will need to include the following information about your first or second window funding request in the narrative box for each applicable FRN on a third window ECF FCC Form 471 : "**Continuing First or Second Window Recurring Service Request: ECF FCC Form 471 Application No.; FRN; Service Start Date; and Service End Date**."

    You will also need to include the following information about the future recurring services being requested between July 1, 2022 and December 31, 2023 in the narrative box for each applicable FRN on a third window ECF FCC Form 471 : "**Continuing Third Window Recurring Service Request: ECF FCC Form 471 Application No.; FRN, Service Start Date; and Service End Date**."

    Note: You may not request duplicative support and may only request up to a maximum of 12 months of recurring service to be received between July 1, 2022 through December 31, 2023. If you will be pausing service, for example, during the summer months, you will need to provide the months of service you are seeking support for based on these existing ECF commitments or the third window ECF funding request.

- Vendor quotes must include quantities.
- Licenses, software, content filtering and security services included in the price of the connected devices are eligible for support and do not require cost allocation. However, separately priced licenses, software, content filtering, and security services are ineligible for ECF funding. Service providers may include these items in the price of the connected device. ECF support for connected devices is capped at $400 per device, even if the base price includes the cost of licenses, software, or content filtering and security services.

- 3-year manufacturer warranties are eligible if they're bundled with the cost of the device. This does not include accidental device protection or insurance-type warranties which are not eligible for support.
- $250 wi-fi hot spot cap does not apply if the hot spot is serving multiple users. Be sure to explain in the FRN narrative that the service is for X number of users being used on school buses (or whatever the location is).
- $250 hot spot cap is just for the hardware. Applicants can seek separate reimbursement for monthly services and those are not subject to the cap as long as they're reasonable.
- A connected device cannot serve as both a connected device and wi-fi hotspot and collect both the $400 and $250 caps.
- The costs of installation, configuration and other eligible charges are counted in the $400 device cap (or $250 hot spot cap). Taxes are eligible, and not counted in the $400 cap. Be sure to list each of these on separate FRN Line Items.
- Cannot invoice for services that have not yet been received, even if pre-paid.
- Can change vendors, make/model after 471 submitted as well as after a funding commitment has been made.
- Laptop/tablet leases are eligible, but only for the amount paid during FY 2022. Finance charges are not eligible.
- Applicants don't need a SAM.gov registration if their vendor will be seeking reimbursement from ECF.
- Vendor SPINs are not required if the school/library will be seeking reimbursement. However, if the vendor has a SPIN, I strongly encourage you to use it on the application.
- Only "reasonable estimate" of unmet need is required at 471 stage, along with an explanation of how you determined the reasonable estimate (publicly available data, PAIU/PSU survey, district survey, etc.). Should have documentation to support unmet needs at *reimbursement* stage. Surveys from 2019, 2020 or 2021 are acceptable. Schools are not required to perform an additional survey for Window 3 for the continuation of services.
- Can seek ECF "commitment" for X number based on reasonable estimate, but then only invoice for less, based on actual student data. Consider invoicing ECF in stages as devices are distributed throughout the year.
- Students/teachers are permitted to bring laptops to campus but districts cannot require devices to remain on-campus.
- If a school or library is receiving E-rate funding for Internet or internal connections, or ECF funding for internet, they must filter all school/library-owned computers, including those used off-campus.
- It is not considered duplicative service to provide wi-fi on buses and also provide those same students with at-home internet.
- The FCC's FAQs provide great clarifications on determining unmet needs: https://www.fcc.gov/emergency-connectivity-fund-faqs.

ECF Form 471 Hints, Do's and Don't's:
- ✓ Create different FRNs for Equipment and Internet. Wi-Fi Hotspot devices and monthly internet service costs must be on separate FRNs (one is equipment and the other services).
- ✓ If you're requesting Internet on buses, list total eligible cost and explain in the narrative that the cost exceeds $250 because it is multiple (x number) of students.
- ✓ If a connected device costs more than $400, just list $400. Don't list the actual price of the device.

- ✓ If seeking installation, configuration or taxes, list these on the same FRN as the device/service, but as a separate FRN Line Item – don't bundle the cost with the device cost. Also, if these are charges related to equipment, you don't have to list a separate "services" FRN.
- ✓ Installation, configuration and taxes must be provided by the same vendor as the underlying equipment/service.
- ✓ If a school is filing multiple 471s, their Unmet Needs Survey should list identical data on each 471. Libraries aren't asked these questions.
- ✓ Upload your vendor quote in the FRN, even though it's not a mandatory field. PIA has been asking applicants to submit them if they weren't uploaded with the application.
- ✓ Vendor quotes should include make and model or service type, quantity, unit cost, service dates. Don't just list a quantity of 1.
- ✓ Signed contracts not required. If using a PO, select "non-contract" as the agreement type.
- ✓ If # of devices/internet service plans on 471 exceeds the quantities listed in the 3rd question of the Unmet Needs Survey, explain the reason for the difference in the narrative. For example, the survey asks for data related to students, but your FRN may include students and teachers.
- ✓ Use the form's default service delivery dates of 7/1/2022 – 12/31/2023. The detailed cost section will ask you to enter the # of months that service is being provided and doesn't automatically calculate using the calendar dates like the E-rate Form 471 does. Be careful.
- ✓ If you indicate that vendor will be seeking ECF reimbursement, you must upload proof from vendor that they've agreed to this.
- ✓ If you get logged out before submitting, go to "My Pending Tasks" to see your draft application (not "My Applications"). Also, as with the E-rate EPC portal, there's a very short timeout setting.
- ✓ If you submit the form and realize you've made a mistake, there's a Modification feature under the Related Actions tab to ask your PIA reviewer to make changes.
- ✓ There's no way to download a PDF of a DRAFT 471, but you can download a PDF of the certified form by using the "Generated Documents" link in the left toolbar and then clicking on "Original Version."

Additional Resources:
- ❖ USAC ECF Customer Service Support Center: 1-800-234-9781. Available Monday – Friday, 8 am – 8 pm Eastern Time
- ❖ 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/
- ❖ FCC ECF Page: https://www.fcc.gov/emergency-connectivity-fund
- ❖ FCC FAQ/Summary: https://www.fcc.gov/emergency-connectivity-fund-faqs
- ❖ PA ECF Resource Page: http://e-ratepa.org/?page_id=32310

If you have any questions, please don't hesitate to e-mail me at jtschell@comcast.net!

-- Julie

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