## E-rate Made Easy! A Primer for PA Libraries



Presented by Julie Tritt Schell
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Fall 2020

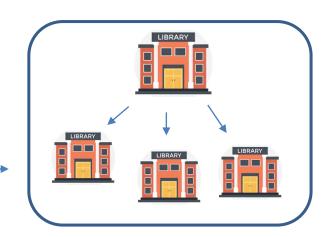
### What is E-rate?

- \$3.9 billion federal program under FCC
  - Funding does not come from federal budget
  - Administered by USAC
- Public libraries eligible for LSTA funding are eligible to apply
  - Includes bookmobiles
- Provides 20-90% discounts on eligible services and equipment
  - Category 1 services TO the library
  - Category 2 equipment INSIDE the library
- Bedrock principles:
  - All equipment and services must be competitively bid on USAC website for at least 28 days
  - Applicants MUST pay their non-discounted share (cannot be waived)
    - For example, if your discount is 60%, you must pay 40%
- Application process begins 6-12 months before funding year begins
- Every applicant has a "Billed Entity Number" BEN
  - Every building has an "Entity Number"

### E-rate Classifications for Various Libraries

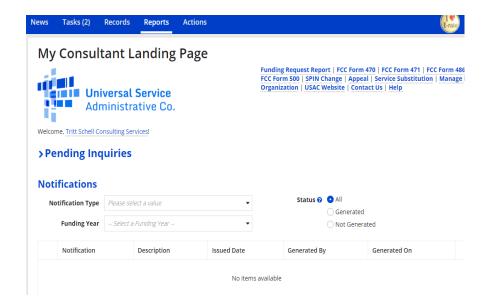
#### 3 different types of library BENs

- Independent Library
  - Stand-alone library, not a branch
- 2. Library System
  - Defined as library that has branches
- 3. Consortium
  - Can be made up of different types of entities
  - Regional (Federated) library systems that procure services on behalf of independent libraries would be considered a "consortium" under E-rate rules
    - Not a "library system" as they're known in PA



## EPC = E-rate Productivity Center

- Account and application management portal
- Almost all E-rate forms, letters and interactions are based in EPC
- Every "Billed Entity" has an EPC Portal Account
- Every EPC Account has "Users"
  - One of the Users is the Account Administrator (AA)
    - Only AA can create new Users for their organization
- Log in through One Portal which requires multi-factor authentication
- Call USAC at 888-203-8100 for EPC assistance



## Library Discount Calculations

- 'Discount Matrix' is used to determine discounts
  - Discount calculations performed automatically and rarely change from year to year
- Independent Library (most PA libraries):
  - Discount based on the % of students eligible for the NSLP in the school district in which that library is located, and whether the library is located in an urban or rural area
- Library Systems:
  - Discount based on the % of students eligible for the NSLP in the school district in which the system's main library is located
    - and
  - The % of libraries in rural areas
- PA Federated Library Systems (33 in PA)
  - Made up of several independent libraries
  - Where System procures shared services, such as WAN/Internet
  - System would file as a Consortium
  - Discount calculate by taking simple average of all consortia members' discounts

## **Discount Matrix**

#### **Category 1**

Category	2

Income % of students in the school that qualify for the NSLP	Category 1 Urban Discount	Category 1 Rural Discount
Less than 1%	20%	25%
1% to 19%	40%	50%
<sup>2</sup> 20% to 34% —	<b>→</b> 50%	60%
35% to 49%	60%	70%
50% to 74%	80%	80%
75% to 100%	90%	90%

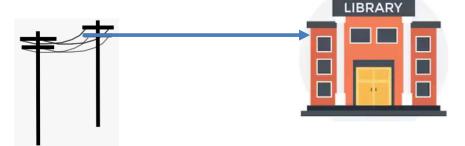
Category 2 Urban Discount	Category 2 Rural Discount
20%	25%
40%	50%
50%	60%
60%	70%
80%	80%
85%	85%

## How Does USAC Obtain Enrollment & NSLP Data?

- Short answer: Each school district updates their schools' EPC profiles annually during an "Admin Window"
- Libraries do not enter enrollment/NSLP data
  - EPC linked to school district in which the library (or main library in a system) is located
  - Libraries just update square footage data during Admin Window
- Admin Windows are typically open from October  $1 1^{st}$  week in January
  - For Funding Year 2021, Admin Window will open Monday, October 19 because of 2<sup>nd</sup> FY 2020 Category 1 application window

## Categories of Service

- Category 1 Services that go TO the library
  - Subcategories:
    - Data Transmission Services (lit and dark fiber, microwave, etc.)
    - Internet Access
    - Installation charges
  - Maximum discount is 90%
  - No E-rate funding caps
  - No off-campus services are eligible
  - Must be delivered during 12 months of funding year (July - June)



- Category 2 Services/equipment that go INSIDE the library
  - Subcategories:
    - Internal Connections (routers, switches, WAPs, wireless controllers, firewalls, UPSs, racks, caching servers, wiring, installation)
    - Basic Maintenance of Internal Connections
    - Managed Internal Broadband Services (MIBS)
  - Maximum discount is 85%
  - Subject to 5-year E-rate funding caps
  - Can purchase over 18 months (April 1 Sept 30)



## Commercially Available Internet Bundles

- "Commercially Available" Internet packages that cost less than \$300 per month, per building (pre-discount) can be purchased without competitive bidding
  - Cost must be based per building and cannot be averaged across multiple buildings
  - Minimum speed must be 100 mbps downstream and 10 mbps upstream
  - Note: This is mostly geared toward small libraries using cable modem/DSL services



## Category 2, 5-Year Funding Caps

Each billed entity's Category 2 E-rate funding has a 5-year cap (FY 2021 – FY 2025), using this formula:

#### Single, Independent Libraries:

- \$4.50 x square feet
- Minimum/building = \$25,000
  - Whichever total budget is greater

#### **Library Systems:**

- \$4.50 x total square feet of all libraries in system
- Minimum/building = \$25,000 x total number of libraries in system
  - Whichever total budget is greater
- Hybrid C2 budget calculation for systems with 10 or fewer libraries: Calculate by library building and take the higher amount (\$25,000, or square feet \*\$4.50) from each library and add together
- C2 budgets are pre-discount
  - Applicants' E-rate discounts then apply
- Equipment can be **transferred** between libraries of a system, but not between consortium members

### Category 2 Funding Budget Example

5-Year Budget Cap*	E-rate Discount	E-rate Will Pay:	Library's Share %	Library Must Pay:
\$204,475	60%	\$122,685	40%	\$81,790

<sup>\*</sup> The Budget Cap is the pre-discount price. E-rate discounts will then apply on top of the budget cap. In this example, district would still owe their 40% non-discounted share

#### What is YOUR 5-Year Category 2 Budget Cap?

• List available at: <a href="http://e-ratepa.org/?p=32602">http://e-ratepa.org/?p=32602</a>

## **The Application Process**



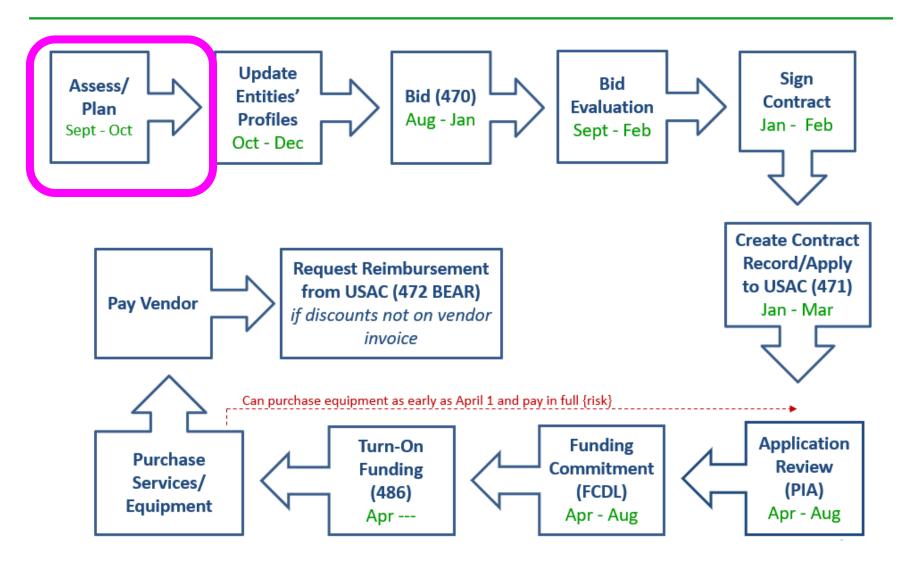
## FY 2021 Application Cycle

- Funding years named for the year in which they begin
  - FY 2021 = July 1, 2021 June 30, 2022
  - Application process begins 6-10 months ahead of start of next funding year

#### **FUNDING YEAR 2021 APPLICATION CYCLE**

										FY 2021 - Non-Recurring Services/Equipment Purchases - April 1, 2021 - Sept 30, 2022  FY 2021 - Recurring Services - July 1, 2021 - June 30, 2022																					
		1	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr												Oct	Nov	Dec	Jan						
For	m	Description			2020			2021	2021	_	2021		2021				2021	_		_	_	_	_	2022	_		2022		_		
47	0	Competitive Bidding Window (min. 29 days)		July 1, 20	020 - N	1id Febr	uary 202	21																							
AV	V A	Administrative Window (EPC Profile Updates)			9 - Earl 2021	y Jan.																									
	Ne	ewly Signed Vendor Contracts Uploaded to EPC		Mid Jan - Late Mar. 2021																											
47	1	Funding Request Application Window	Mid Jan - Late Mar. 2021																												
PIA FCI	· I PIA	A Review/Funding Decision Letters (FCDL) Issued	•							А	pril 202	21 - Sep	ot 1, 202	21																	
48	486 CIPA Certification/Turn on Funding																														
BEAR Deadline - Recurring Services																									Oct 28						
4/	BEAR Deadline - Non-Recurring Services																													Jan 28	

## Step 1... Assess Needs and Plan

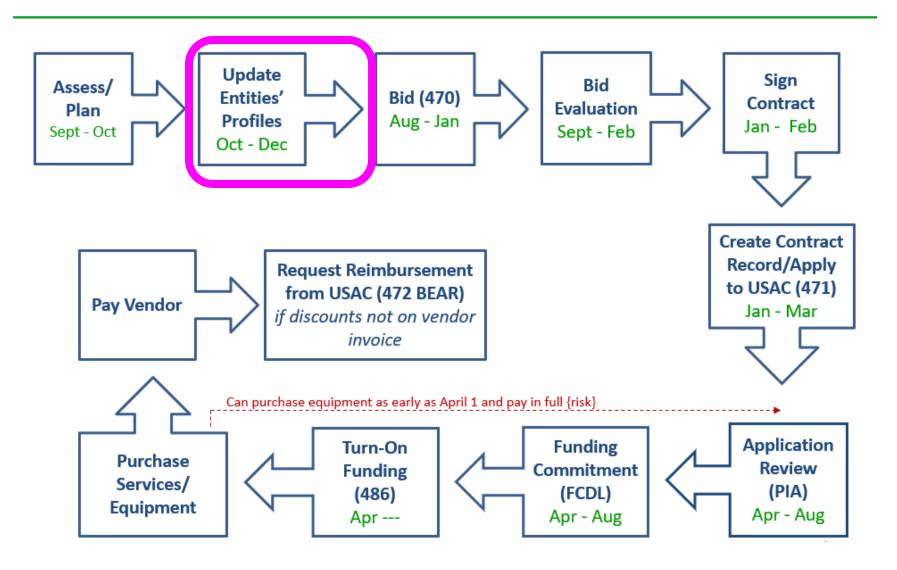


## Step 1: Assess Need & Plan

- When? September/October
- Category 1: Review existing contracts to determine when they expire
  - Extend, if options available
    - Must have documentation to vendor of request to extend
  - If contract expiring, decide if upgraded services are needed
- Category 2: Determine what equipment/wiring is needed for each library over 18 months of upcoming funding year
  - Research options, prepare bid-list

**Review Julie's List of Contract Expiration Dates** 

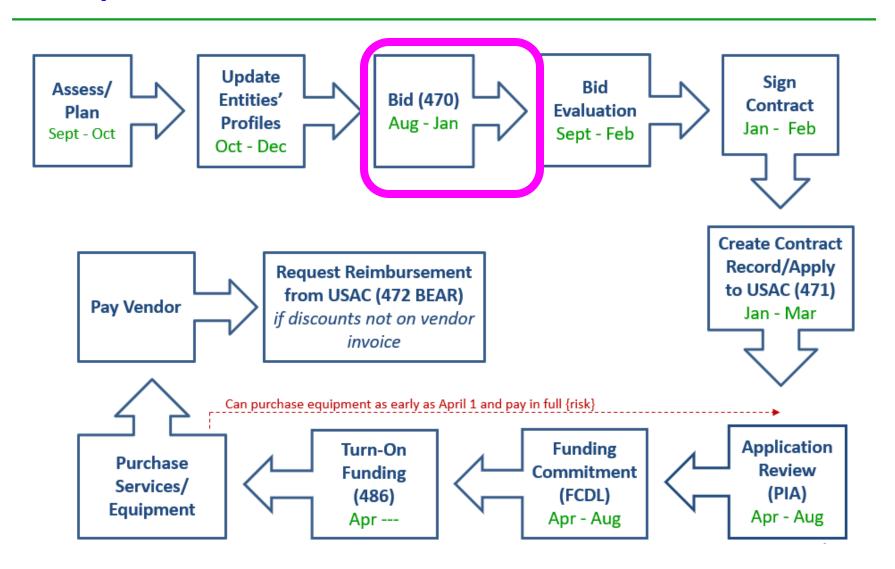
## Step 2... Update Entities' Profiles



## Step 2... Update Entities' Profiles

- Update Entities' Profiles during Administrative Window each fall
  - 3-months when schools must update enrollment/NSLP data for each school
  - Libraries just update square footage/address changes, if any
  - Data cannot be changed when Admin Window closes
  - Why? Libraries and consortia rely on schools' discount data to calculate their discounts
    - Their forms don't work unless data is "locked down"
- Confirm all entities, including NIFs, are in EPC portal
  - Contact CSB at 888-203-8100 to make entity adjustments

## Step 3... Post Form 470s



## Step 3: Posting the Form 470

#### **Purpose of the Form 470**

- Online form to notify vendors of services and equipment for which you are seeking proposals
- All equipment/services for which you will seek funding on the Form 471 must have been posted on a Form 470 (except Commercially Available Internet)

#### Form 470s must be posted...

- Annually for all services purchased on a month-to-month (MTM) basis
- At the beginning of any new contract. If you signed a multi-year contract in a previous year, after posting a Form 470 and waiting at least 28 days, you are NOT required to post a Form 470 for the "remaining" years of that contract

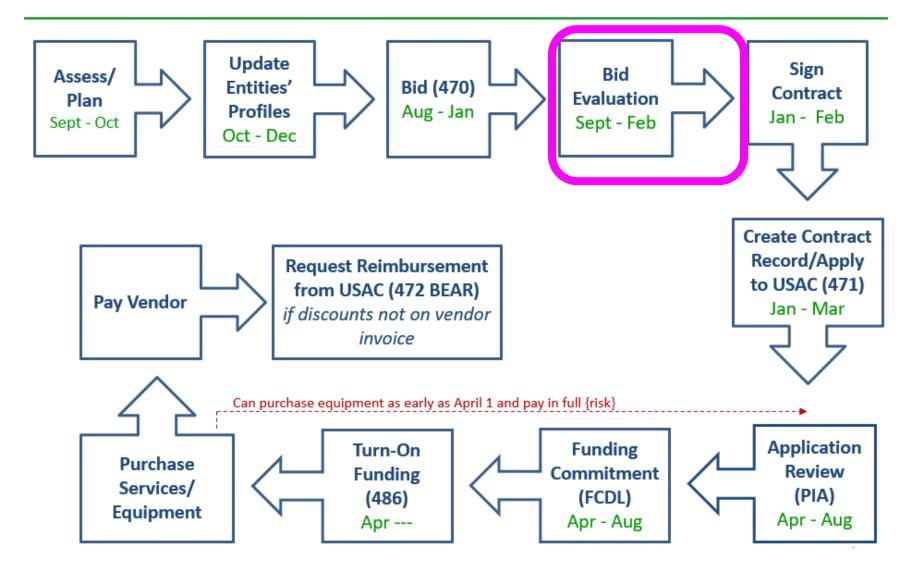
#### What happens during 28 day bidding period?

- Vendors to submit bids/price quotes directly to the applicant
- Applicants are NOT obliged to purchase any service/equipment listed on Form 470

**Deadline**: Form 470 must be available <u>at least</u> 29 days before the Form 471 window close For example:

- If Form 471 deadline is March 19; therefore...
- February 19, 2021 = 470 Deadline
  - <u>DO NOT wait this long!</u> Gives you 1 day to evaluate bids, negotiate contracts, sign contracts, and then file the Form 471 by the 471 deadline
  - File 470 before December 1, if possible

## Step 4... Evaluating Bids



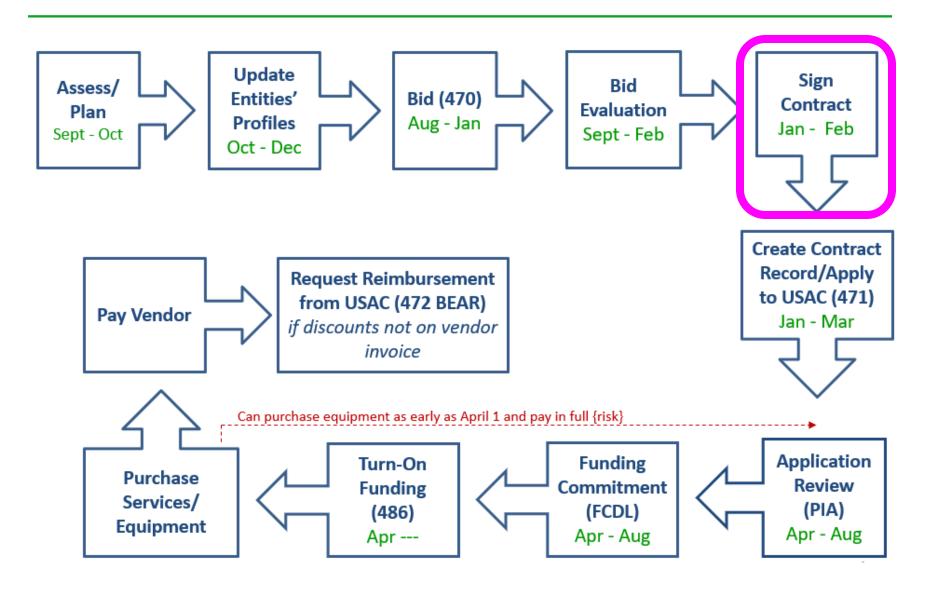
## Step 4: Evaluating Bids

- After the bid due date (which must be at least 29 days after 470 is posted),
   applicant must evaluate all qualified bids received
- Must create and retain bid evaluation matrix

Price of eligible services/equipment MUST be the most heavily weighted factor during bid evaluation

- Examples of other evaluation criteria:
  - Quality of proposed solution
  - Cost of <u>ineligible</u> items
  - References
  - Experience with the vendor
  - Ability to meet installation deadline
- Retain all winning and losing bids and all correspondence between applicant and all vendors (winning and losing)
- Bids can be disqualified if DQ reason was stated in the 470 or RFP

## **Step 5... Signing Contracts**

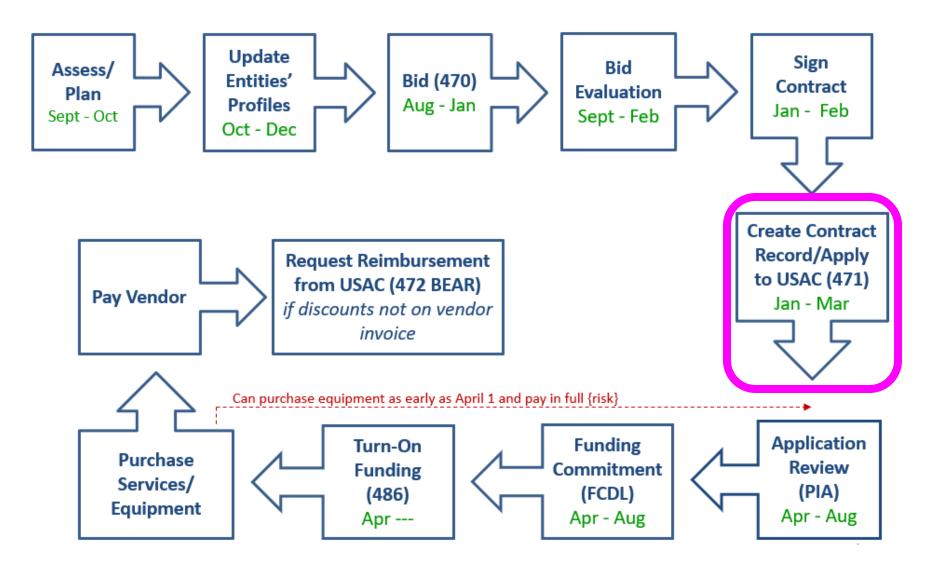


### **Vendor Contracts**

- Contracts must be signed/dated by the <u>applicant</u> <u>before</u> you submit Form 471
  - Unless receiving services on month-to-month basis
  - Vendor can sign after the Form 471 deadline
- Contract tips available at: <a href="http://e-ratepa.org/?p=32178">http://e-ratepa.org/?p=32178</a>



## Step 6: Contract Records/Applying for Funding (Form 471)



## Step 6: Filing the Form 471

#### **Purpose of the Form 471**

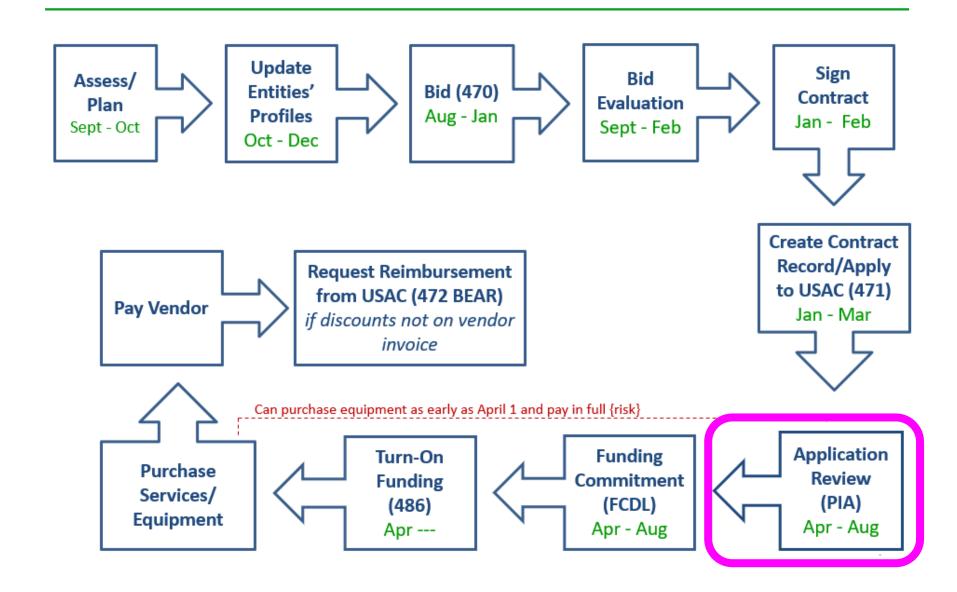
- Filed by entity that actually pays the bills (the Billed Entity)
- Formally requests E-rate funding commitments from USAC
- Must submit annual application during the "Form 471 application window" early January – mid March

#### **Funding Requests**

- Each separate funding request on the Form 471 is assigned a number, called a Funding Request Number (FRN)
- Each FRN is "built" by adding FRN Line Items
  - Provides details about services/equipment and which libraries receiving service
  - Links to a Contract Record(s) to show which Form 470 was used to bid services, contract signing dates, contract amounts, etc.



## Step 7: PIA Application Review



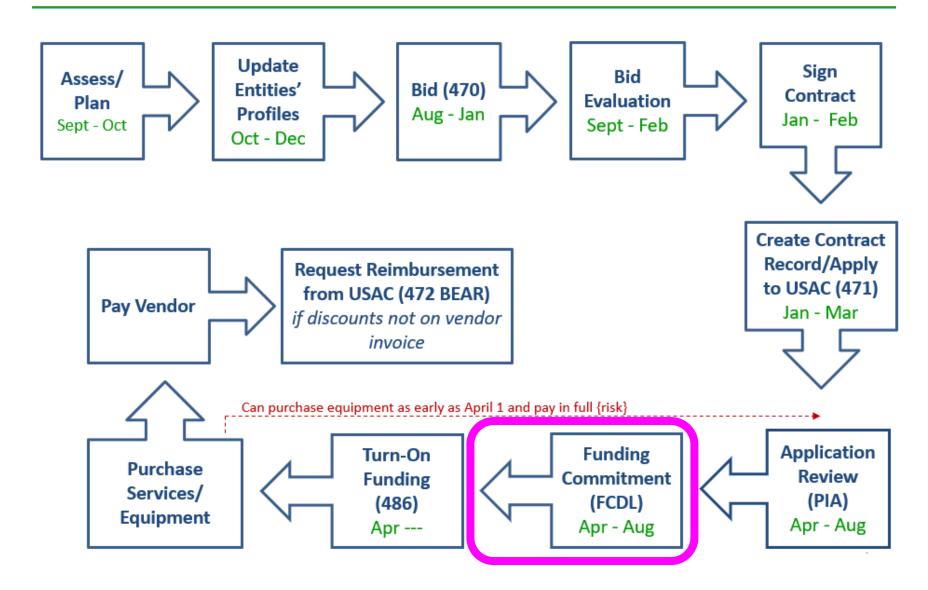
## Step 7: PIA Review

#### **Program Integrity Assurance (PIA) Review**

- USAC team that reviews all applications submitted within the "Form 471 Window" and makes determination on funding approval/reductions/denials
- Checks for rule compliance
  - Eligible services
  - Eligible entities
  - Appropriate discount level
  - Competitive bidding violations
  - Category 2 budget levels
- The Form 471 contact will receive an email notification that PIA questions are pending in EPC about their application
- Applicants have 15 days to respond
- PIA will notify if they intend to deny or reduce request



## Step 8: Funding Commitment Decisions



## Step 8: USAC Issues FCDL

#### **FCDL** = Funding Commitment Decision Letter

- Funding "waves" are released weekly
  - Goal is to have all "workable" applications funded by Sept 1
- FCDLs e-mailed to Form 471 contact and EPC AA
- Gives approval decisions of each funding requests (FRNs) on Form 471
- Can appeal within 60 days if you don't agree with their decision
  - Appeal to USAC first
  - Can then appeal to the FCC if USAC denies

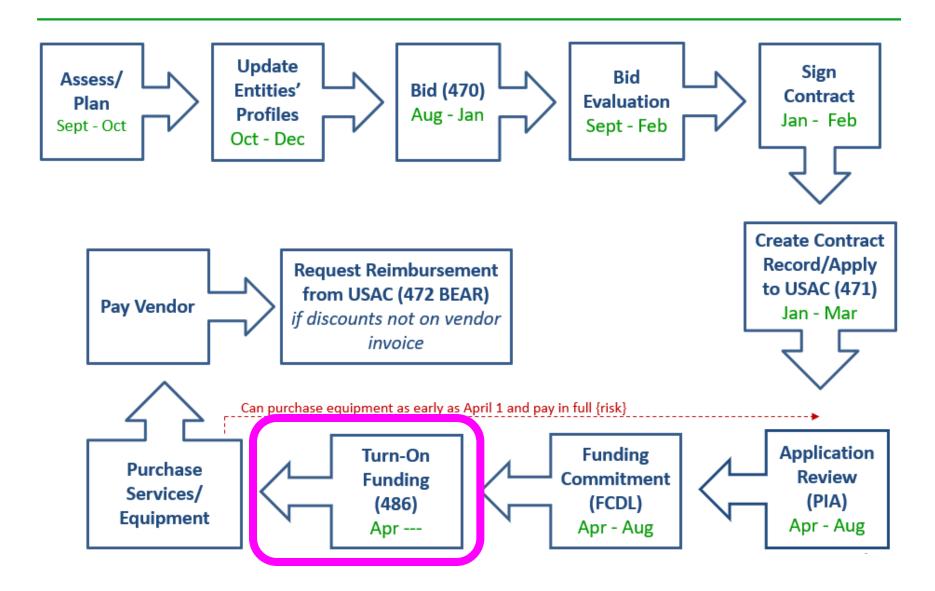




Watch PA E-rate listserve for weekly wave notices!



## Step 9: Filing the Form 486



## **Step 9: Form 486**

#### Form 486 Receipt of Services Form

- Informs the SLD that services have (or will) start, and
- Informs the SLD that your school or library is CIPA compliant
- Can only be filed after the FCDL has been issued
- Form 486 is very simple! Almost all data fields pre-populated

Deadline: 120 days after FCDL date or October 28, whichever is later



## **CIPA Requirements**

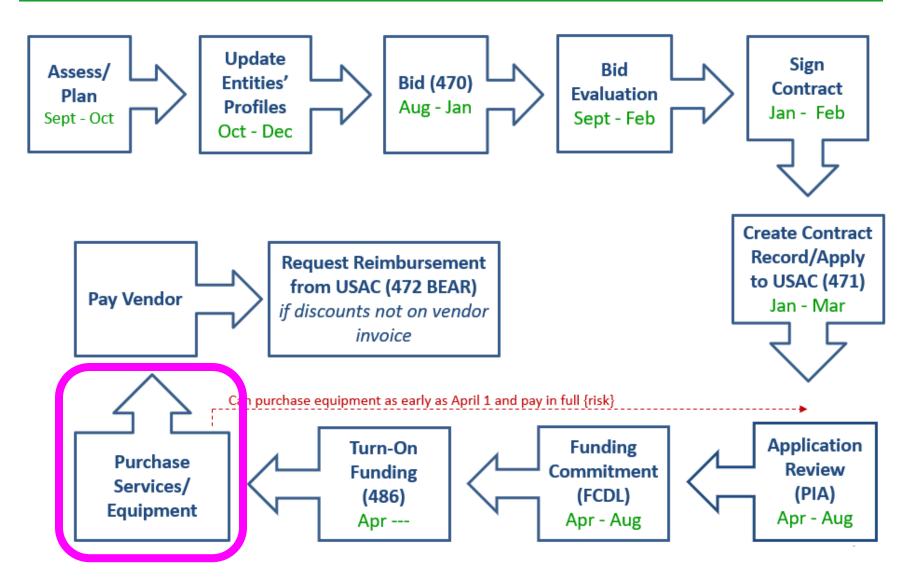
## Any library receiving either Internal connections or Internet access must...

- Filter all Internet access
- Have an Internet Safety Policy that addresses required elements
  - Policy must have been adopted after public hearing
- Consortium members submit Form 479 to consortium leader certifying compliance in order for consortium lead to submit Form 486



The Child Internet Protection Act

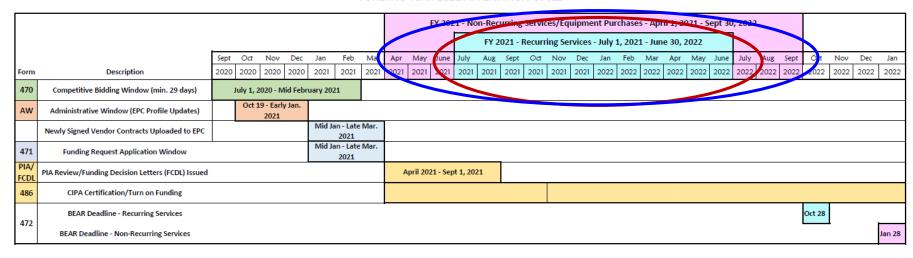
## Step 10: Receiving Services/Equipment



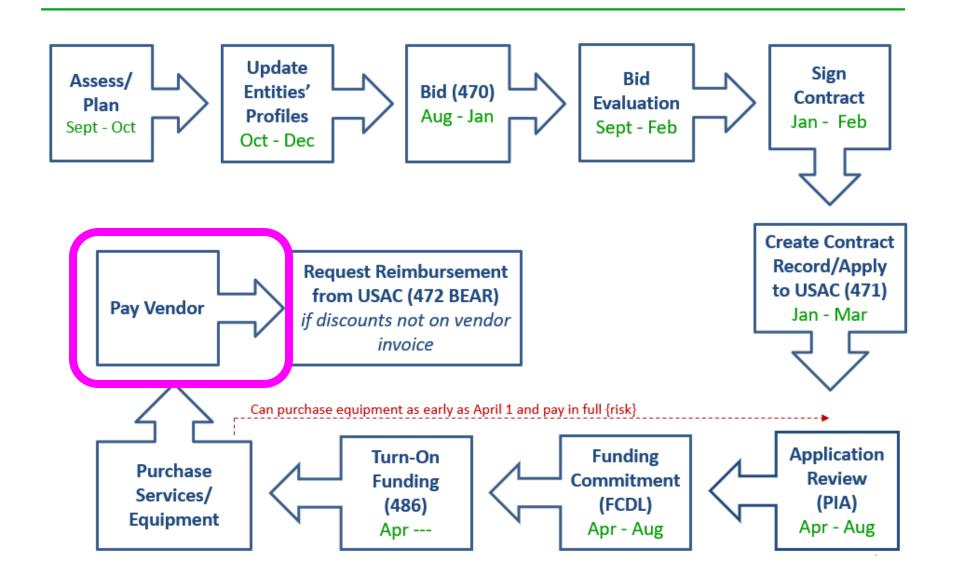
## Step 10: Receiving Services

 Services may begin on July 1, except for equipment which may be purchased as early as April 1

#### **FUNDING YEAR 2021 APPLICATION CYCLE**



## Step 11: Paying for Services/Equipment



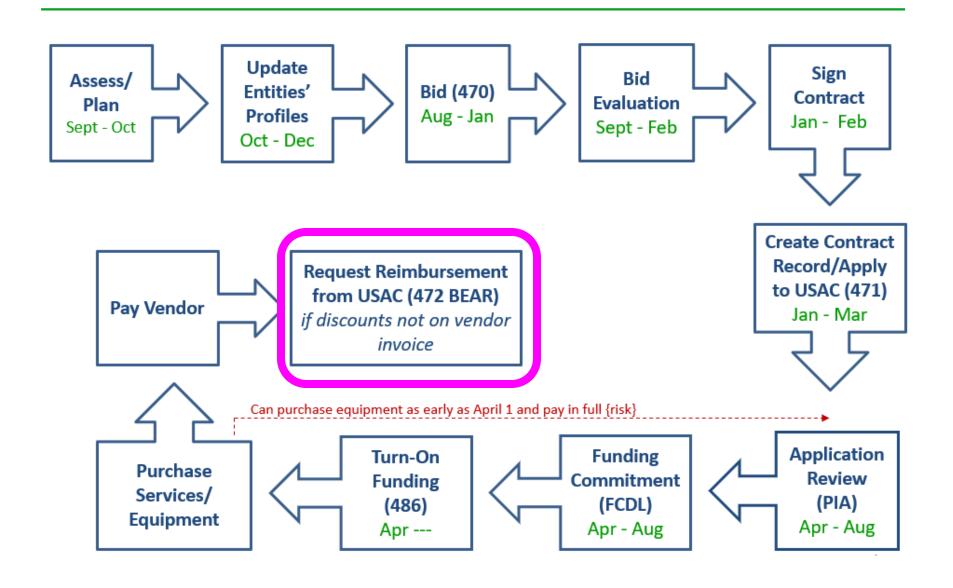
## Paying for Equipment/Services

- Applicant's choice
  - Discounts on bills (vendor invoices USAC)
     or



- Reimbursement process (applicant pays bills in full, then invoices USAC)
- Must select one or the other for entire year for each FRN
- Applicants must always pay their non-discounted share

## Step 12: Requesting Reimbursements



### Reimbursement Method - BEAR

#### Form 472 BEAR

- If applicant pays the vendor invoice in full, applicant submits Form 472 BEAR Form to USAC for reimbursement
- Must have a PIN to file BEAR (not same as EPC password)
- USAC approves BEAR and sends payment to applicant's bank account via EFT
  - Bank account info originally submitted on Form 498

#### Deadline:

- October 28 (following close of funding year) for recurring services;
- January 28 for non-recurring services/equipment

## Getting started...

- Are you on Julie's E-rate listserve?
  - E-mail Julie at <u>jtschell@comcast.net</u> if not
- Review E-rate Onboarding Guide
- Attend training webinars
- Get set up as an EPC User
- Subscribe to USAC's weekly newsbrief
  - Subscribe at: <a href="https://www.usac.org/e-rate/resources/news-brief/">https://www.usac.org/e-rate/resources/news-brief/</a>

## Preparing for FY 2021...

#### FY 2021: Category 1:

- Review existing C1 contracts to see if they expire June 2021 or have extensions
- If so, determine if you want to increase bandwidth and post 470 to bid the services
- Sign up for Category 1 training in early November

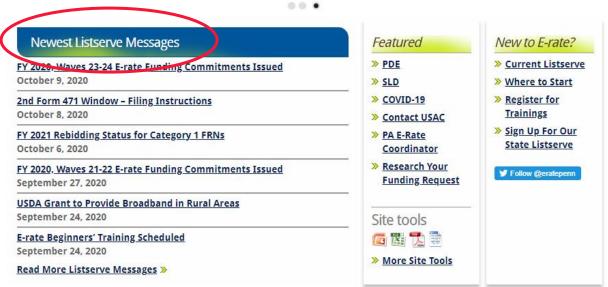
#### FY 2021: Category 2:

- Determine if library needs any C2 equipment for next year
- If so, post 470 between now and January
- Then wait at least 28 days before signing contract
- File Form 471 during application window Jan Mar
- Sign up for Category 2 training in early November

Make Your FY 2021 E-rate Plan!

## E-ratepa.org





## Where to Go For E-rate Help

- USAC's Client Service Bureau (CSB)
  - E-rate "Help Desk" where applicants can get answers to questions
  - Call 888-203-8100
  - Submit a 'Customer Service Case' in EPC
- PA E-rate Coordinator
  - E-mail jtschell@comcast.net
  - Attend webinars!
  - Read listserve messages!
  - www.e-ratepa.org
  - Helpful Documents: <a href="http://e-ratepa.org/?page\_id=754">http://e-ratepa.org/?page\_id=754</a>
  - Training: <a href="http://e-ratepa.org/?page\_id=745">http://e-ratepa.org/?page\_id=745</a>
  - Onboarding Guide: <a href="http://e-ratepa.org/?page\_id=747">http://e-ratepa.org/?page\_id=747</a>



# That's All! Any questions?

