

Emergency Connectivity Fund (ECF) Overview/Update

... for PA School Business Officials (PASBO)



Presented by:
Julie Tritt Schell, PA E-rate Coordinator
PA Department of Education
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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 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 offering virtual education
 - Intended to help solve Homework Gap as well
 - Anywhere that a student learns when not on school campus
- 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
- Connection 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



Eligible Funding Period

- “Window 1” will cover unmet needs from July 1, 2021 – June 30, 2022
 - Equipment/services must be received and 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 schools and libraries eligible for E-rate funding are eligible for ECF
 - Not required to currently participate in E-rate
- 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 reimbursements will be made to bank account connected to SAM.gov account (not account listed on E-rate Form 498)



Eligible Recipients and Locations?

Recipients:

- K-12 students, library patrons, and educators that are engaged in remote learning
- Must have an “unmet need” – meaning they don’t otherwise have “sufficient” internet access or access to a connected device to engage in remote learning
- Schools and libraries must be able to show reasonable measures taken to determine who needs equipment/services
 - Cannot just say “we gave to all low-income students”
 - Libraries must have patrons sign a statement attesting to this need when they check out devices

Locations:

- Any off-campus location where education is occurring. Examples:
 - Homes
 - Community Centers
 - Churches
 - School buses, both parked and moving
 - Bookmobiles
- Equipment/services may not be purchased solely for use at school or library
 - Students/teachers/patrons may bring devices to school/library



Determining “Unmet Needs”

How should applicants determine their unmet needs?

- The FCC has not prescribed a *specific* way for applicants to go about estimating what they will need to address unmet needs
- Schools must prove “**reasonable effort**” to determine who would otherwise lack sufficient connectivity or devices to engage in remote learning
 - Estimates based on some valid school data will likely be accepted during Form 471 application stage
 - Can be collected as of beginning of pandemic
 - Invoicing ECF should be based on actual purchases and be trackable to specific students/teachers
- Form 471 requires applicants to describe how and when they collected the information that they use for the estimates
 - Statewide survey conducted to assist schools – responses provided to IUs/districts weekly
 - Extrapolation is permitted



What's Eligible: Equipment

- Connected Devices = laptops/tablets (one per student – no in-home sharing required)
 - Desktops and cell phones are not eligible
 - Maximum reimbursement/device = \$400 (can be higher for students with disabilities)
- Wi-Fi hotspots
 - Maximum reimbursement/device = \$250
- Modems, routers (and devices that combined these)
- Cellular aircards
- Shipping, taxes, configuration charges
- Restrictions:
 - No more than 1 laptop/tablet per person (student, teacher, library patron)
 - Schools must restrict access to only students/teachers/patrons with appropriate credentials
 - Must be used “primarily” for educational purposes
 - Credentialed person may use for other purposes when not needed for educational activities



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:
 - No more than 1 fixed internet connection per location (cable, DSL)
 - No more than 1 Wi-Fi hotspot per person
 - “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



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
- 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



*Options for Areas with No Service

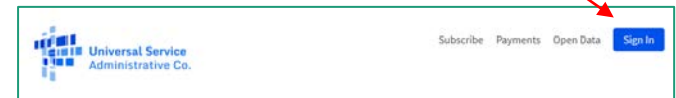
- Where no commercial internet access service is available in an area that is sufficient to meet remote learning needs, applicants have 2 options:
 - ECF will pay for **construction of new networks** to serve students, school staff & library patrons **OR**
 - ECF will also pay for **customer premises equipment to receive datacasting services**
 - IP data transmitted over public television airwaves to a computer and provides access to remote learning in homes without internet access
 - Datacasting customer premises equipment is not specifically defined in the Order and may vary according to the specifications of the local public television station, and may include but not be limited to network interface devices and antennas that receive and transmit content to computers
- “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 ~



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 school/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 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
 - Vendors not required to agree to this
 - Must upload **proof of vendor willingness** on ECF Form 471 application
- **Deadline:** 60 days of equipment/service delivery date (or FCDL/RFCDL date, whichever is later)
 - Recurring services provided through June 2022 may be invoiced through August 29, 2022



ECF Form 471 Application

- ECF Form 471 consists of 5 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?
 - **'Unmet Needs' Survey Questions...**



'Unmet Needs' Form 471 Survey

- ECF Form 471 will include a series of questions regarding the unmet needs of their students and/or educators
 - Provide best estimates only
 - Answers will help to inform future policy making
- **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 2020-2021 school year
 - 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
 - 1) Explain in narrative if answer to # 3 includes educators



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



Attendee Questions....



Answers to Questions

- Is the provision of eligible equipment and services to school staff with a need limited to those who are involved directly with the education of students such as teachers and para-professionals?

Answer: Yes.

- Regarding the determination of need described in paragraph 81, if a district-owned Connected Device has already been assigned to a student who needs the device for remote online learning, but the device is no longer sufficient, can the district receive ECF money to purchase a new connected device?

Answer: Yes. 47 C.F.R. §54.1710(a)(1)(vii) requires each school/district applicant to certify on their Form 471 applications that they are “only seeking support for eligible equipment and/or services provided to students and school staff who would otherwise lack connected devices and/or broadband services sufficient to engage in remote learning[.]”

- Is there a minimum age of a Connected Device before it may be replaced and paid for with ECF money?

Answer: No.

- Is there a minimum number of days that hotspots or connected devices must be in use, that is, loaned out to library patrons, to justify ECF funding approval?

Answer: No, there is no hard or fast rule here but the intention is to ensure that applicants do not to seek support for devices that are warehoused or held in reserve.



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 schools use ECF support for internet on buses that take students to/from school (meaning there is no requirement that school bus internet be limited to “parked” buses)?

Answer: Yes, however, when a school bus offers Internet access (whether parked in the community or transporting students), the service must be restricted to students and eligible staff, in order to meet the “educational purposes” requirement.

- For recurring services, can the charges for the entire year be invoiced within 60 days of the last date of service, or by August 29, 2022?

Answer: Yes, but only if the services were provided **through** June 30, 2022

- Where equipment is serving multiple students (such as wifi-on buses), can applicants purchase a device that costs more than \$250?

Answer: Yes, but they will be required to explain this on their application

- Will there be a post-commitment process like Form 500 to de-obligate ECF funds?

Answer: Yes, post-commitment functionality is expected to be available in the fall.



Answers to Questions

- Is the \$250 cap for both the hot spot and monthly costs?

Answer: No, the \$250 cap is just for the hot spot device.

- 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: We believe the answer is no.

- Is there a limit per monthly cost for a hotspot?

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.

- Does the “prospective reimbursement” process require an FCDL before USAC will transfer funds to the district?

Answer: Yes.

- Are leased laptops eligible for ECF?

Answer: Yes.



Answers to Questions

- 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.
- Should we seek reimbursement as internet services are delivered or wait until the end of the funding year to seek reimbursement?
 - **Answer:** This is entirely a location decision. For recurring internet services delivered through June 2022, you may seek reimbursement for the entire year before the August 29, 2022 deadline. But for all equipment, the reimbursement deadline is 60 days from the equipment delivery date.
- Will the school district be “on the hook” for the cost of the internet build-out if the project can’t be completed within a year of the FCDL date?
 - **Answer:** We anticipate that where a project cannot be completed within a year of the FCDL date due to reasons outside of the district’s control, the district will be able to request a 1-year extension from the FCC or USAC. We do not expect the FCC to put that burden on the district.

